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SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

August 12, 2025

TO: City Planning Commission

FROM: Danalynn Dominguez, City Planner

TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2024-4114-CU3-DB-SPPC-PR-VHCA; 4765, 4767, 4773 W. HOLLYWOOD BOULEVARD, 1710, 1718, 1720 N. BERENDO STREET

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of August 14, 2025, related to Item No. 5b on the meeting agenda.

The technical modification is for the following:

First, the appeal status shall be revised as follows (Added text is shown in **bold underline**)

Appeal Status: The Off-Menu Density Bonus / Affordable Housing Incentive Program Review is not appealable to City Council. The **Class 3 Conditional Use Permit**, Density Bonus On-Menu Incentives, Specific Plan Project Compliance, and Project Review are appealable to City Council.

Second, Planning Staff is submitting the attached revised set of findings, which includes the Class 3 Conditional Use Permit findings for Case No. CPC-2024-4114-CU3-DB-SPPC-PR-VHCA.

REVISED FINDINGS

FOR CONSIDERATION BY THE CITY PLANNING COMMISSION AT ITS MEETING ON
AUGUST 14, 2025

CLASS 3 CONDITIONAL USE FINDINGS

The City's Density Bonus Ordinance (Ordinance No. 179,581), codified in LAMC Section 12.22 A.25, permits a maximum density increase of up to 35 percent in exchange for setting aside 11 percent of the base density units for Very Low Income Households in accordance with the State Density Bonus Law (Government Code Section 65915). The State Density Bonus Law (Government Code Section 65915(n)) also allows a city to grant a density bonus greater than 35 percent for a development, if permitted by a local ordinance. The City adopted the Value Capture Ordinance (Ordinance No. 185,373), codified in LAMC Section 12.24 U.26 and modified in 2018, to permit a density increase greater than 35 percent with the approval of a Conditional Use.

The following is a delineation of the findings, and the application of the relevant facts as related to the request for a Conditional Use Permit to allow a 42.5 percent Density Bonus, or 86 residential units, pursuant to LAMC Sections 12.24 U.26.

1. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.

In accordance with State Density Bonus Law (Government Code Section 65915 and Assembly Bill 2334), the Applicant is obtaining the base density allowance from the maximum allowable residential density permitted under the Zone, Specific Plan, or General Plan Land Use Designation. The project site is within the Hollywood Community Plan and Subarea A and Subarea B of the Vermont/Western SNAP Specific Plan. The proposed project is comprised of two different zones, RD1.5-1XL and [Q]C2-2D, within two different Subareas of the Vermont/Western SNAP, A (Neighborhood Conservation) and B (Mixed Use Boulevards), which have different by-right allowable maximum densities and FARs. Subarea A defers to the density and FAR permitted by the underlying zoning designation, or the RD1.5-1XL Zone. The RD1.5-1XL Zone permits one dwelling unit for every 1,500 square feet of lot area and permits a maximum FAR of 3:1. Subarea B permits residential uses permitted in the R3 Zone, and a maximum FAR of 2:1 for Mixed Use Projects. Based on the area regulations of each respective Subarea and corresponding zone where applicable, the Project Site is allowed 60 units by-right.

The Applicant seeks a Density Bonus increase of 42.5 percent to permit 86 residential units on-site. In exchange for the increased density, the Value Capture Ordinance requires projects to set aside one (1) additional percent of base density units above the 11 percent set aside for Very Low Income Households for every additional 2.5 percent density increase above 35 percent. Below is a table showing the requisite percentage of affordable housing units for Very Low Income Households based on the percentage of density increase. In exchange for setting aside 42.5 percent of the base density, nine (9) units, for Very Low Income households, the project qualifies for a 42.5 percent density increase. The Applicant proposes to set aside nine (9) units for Very Low Income Households to be eligible for the 42.5 percent density increase.

<i>Very Low Income Units (Percentage of Base Density)</i>	<i>Maximum Density Bonus Permitted (Based on Base Density)</i>
5%	20%
6%	22.5%
7%	25%
8%	27.5%
9%	30%
10%	32.5%
11%	35%
12%	37.5%
13%	40%
14%	42.5%
15%	45%

Table 1: Extended Density Bonus Percentages from Chapter 1 of the LAMC Section 12.22 A.25

The City's Housing Element for 2021-2029 was adopted by City Council on November 24, 2021 and June 14, 2022. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. According to the 2021-2029 Housing Element of the City of Los Angeles General Plan, page 57, Table 1.8 shows the wide variation of incomes present in the City and highlights the high percentage of households with very low incomes. About 22% of the City's households earn less than \$25,000 a year and 42% of all households make less than \$50,000 a year. Additionally, the Housing Element shows that of the 51.7% of total households that are considered cost burdened, 59.3% are renter occupied, demonstrating that a significant number of Los Angeles' cost burdened households are renters. The City has determined that the shortage of affordable housing is an ongoing crisis in the City of Los Angeles. Therefore, the increased intensity of the proposed development will be offset by the Project's ability to provide the number of affordable units required by the City's Density Bonus policy.

By providing additional housing, jobs and neighborhood serving amenities, the Proposed Project will establish a place to live, work and play near a major transit node. Therefore, it can be found that the Proposed Project would provide a service that would be beneficial to the community, city and region.

- 2. The project's location, size, height, operation and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.**

The proposed project includes the construction, use and maintenance of a new 6-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area resulting in a net increase of 86 dwelling units, including nine (9) units reserved for Very Low Income households.

The proposed project is comprised of two different zones, RD1.5-1XL and [Q]C2-2D, within two different Subareas of the Vermont/Western SNAP, A (Neighborhood Conservation) and B (Mixed Use Boulevards), which have different by-right allowable maximum densities and FARs. However, the Project request includes a Conditional Use for an increase in density in excess of 35 percent pursuant to LAMC 12.24 U.26, for a total of 86 units. The SNAP provides regulations and incentives for development within its boundaries, and, per Section 3 of the SNAP, takes precedence over those in the LAMC wherever the Specific Plan contains provisions which require or permit greater or lesser controls on development. However, the Density Bonus Ordinance regulations implement the provisions of State Law and therefore supersedes the Specific Plan. Given this, there will be circumstances where a Projects' height and size may be larger than what would be typically developed within certain Subareas of the SNAP, in order to accommodate the additional affordable units as allowed per State Law. As such, while the Proposed Project may not be entirely compatible with the adjacent properties, it can be found that it is not entirely incompatible with the surrounding neighborhood.

The project includes improvements on the ground level to enhance the pedestrian realm in compliance with the SNAP including new street trees, bicycle racks, public benches, trash receptacles, and landscaping. Parking for the project is provided within the building with access from a driveway along Berendo Street which is the desired location as opposed to interrupting the urban streetscape on Hollywood Boulevard.

Based on the above, the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

3. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable Community Plan, and any applicable Specific Plan.

The General Plan sets forth goals, objectives, and programs that serve as the foundation for all land use decisions. The City of Los Angeles' General Plan consists of the Framework Element, seven State-mandated Elements including Land Use, Mobility, Housing, Conservation, Noise, Safety, and Open Space, and optional Elements including Air Quality, Service Systems and Plan for a Healthy Los Angeles. The Land Use Element is comprised of 35 community plans that establish parameters for land use decisions within those communities of the City.

Framework Element

The Framework Element for the General Plan (Framework Element) was adopted by the Los Angeles City Council on December 11, 1996, and re-adopted on August 8, 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element of the General Plan establishes general policies for the City of Los Angeles based on projected population growth. Land use housing, urban form and neighborhood design, open space, economic development, transportation, infrastructure, and public services are all addressed in the context of accommodating future City-wide population increases. The City's various land use "categories" are defined based on appropriate corresponding development standards including density, height, and use. The proposed development is consistent with the following goals, objectives, and policies of the Framework Element:

Objective 3.1 : Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

- Objective 3.4: 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.
- Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.
- GOAL 3: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.
- Policy 3.9.6: Require that commercial and mixed-use buildings located adjacent to residential zones be designed and limited in height and scale to provide a transition with these uses, where appropriate.
- Policy 3.9.7: Provide for the development of public streetscape improvements, where appropriate.

Figure 3-1 Metro Long Range Land Use Diagram of the Framework Element indicates that the project site is located within a Community Center, which is described as a focal point for surrounding residential neighborhoods and containing a diversity of uses such as small offices and cultural and entertainment facilities, in addition to neighborhood oriented services. A mixed-use center that encourages the development of housing in concert with the multi-use commercial uses is one of the two types that the Framework Element identifies. Generally, community centers range from FAR of 1.5:1 to 3:1. Physically, the scale and density of community centers would be greater than the neighborhood districts, generally with building heights ranging from two to six stories depending on the character of the surrounding area.

The proposed project includes the construction, use and maintenance of a new 6-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area. The commercial spaces will mainly front Hollywood Boulevard. The commercial spaces on the ground floor will provide a variety of uses for the surrounding residential neighborhood. Furthermore, the proposed mixed-use, in conjunction with Density Bonus, meets the goals and objectives for a Community Center area under the Framework Element. The project site is comprised of 28,472 square feet of lot area and the proposed building contains a combined floor area of 93,286 square feet, resulting in a FAR of 3.57:1 FAR, which is a 78.5 percent floor area increase to the 2:1 Floor Area Ratio (FAR) permitted in Subarea B of the Vermont/Western SNAP Specific Plan and a 19 percent floor area increase to the 3:1 FAR permitted in the RD1.5-1XL Zone through Density Bonus, in exchange for setting aside nine (9) units for Very Low Income Households. The proposed building is designed at six (6) stories above grade with a 69-foot height measured at the roof parapet. The adjacent properties have heights that range from one to four stories. As such, the project is consistent with objective, goals and policies in a Community Center of the Framework Element.

Hollywood Community Plan

The subject property is located within the boundaries of the Hollywood Community Plan, which establishes land use designations and planning policies for the area. An updated

Hollywood Community Plan was adopted by City Council on May 9, 2023, and became operative on February 11, 2025. The project application was filed before February 11, 2025, as a Vesting Housing Crisis Act project. Therefore, the project is vested to the local planning and zoning rules that were in place at the time the Vesting Housing Crisis Act application was submitted, or on April 11, 2024 and the project is not subject to the new Hollywood Community Plan and its Community Plan Implementation Overlay.

The Hollywood Community Plan designates the RD1.5-1XL zoned parcel for Low Medium II Residential land uses, which correspond to RD2 and RD1.5 Zones. The two (2) [Q]C2-2D zoned parcels are designated for Highway Oriented Commercial land uses, which correspond to C1, C2, P, RAS3, and RAS4 zones. The proposed 86-unit mixed use building complies with both the intent and provisions of the General Plan and Hollywood Community Plan area.

The Hollywood Community Plan, a part of the General Plan's Land Use Element, sets various goals and objectives for the planning and development of the area, and creates a vision for the growth and development of the area. While the plan is silent on specific land uses and conditional uses, the Hollywood Community Plan states the following goal, objectives, and policies:

Objective 1: To further the development of Hollywood as a major center of population, employment, retail services, and entertainment [...].

Objective 3: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

Objective 3.4: Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.

Standards and Criteria (Commerce): [...]. Future development should be compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system. Developments combining residential and commercial uses are especially encouraged in this Center area.

Standards and Criteria (Housing): New apartments should be soundproofed and should be provided with adequate usable open space at a minimum ratio of 100 square feet per dwelling unit excluding parking areas, driveways and the required front yard setback.

The proposed mixed-use development is in an area that is close to a major transit station and various bus routes, connecting the project site to other regional and local destinations as well as employment centers and retail services. The proposed project will contribute to the Hollywood area as a medium- to high-density mixed-use development that provides housing, employment, and retail services for residents and visitors of the area. Furthermore, the project has been conditioned 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, for any dwelling units with their exterior wall having a line of sight to a public street or alley. This will meet the Standards and Criteria of the Hollywood Community Plan to soundproof new apartments. In addition, the proposed project includes adequate usable

open space at a ratio of 100 square feet per dwelling unit or more, pursuant to the Chapter 1 of the LAMC Section 12.21 G.2.

Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan

The Vermont/Western SNAP Specific Plan was adopted by the Los Angeles City Council and became effective on March 1, 2001. The proposed project meets the following purposes of the SNAP as outlined in Section 2 of the Specific Plan:

- 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.
- 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.
- H. Promote increased flexibility in the regulation of the height and bulk of buildings as well as the design of sites and public streets in order to ensure a well-planned combination of commercial and residential uses with adequate open space.

The project site is located within Subarea A (Neighborhood Conservation) and Subarea B (Mixed Use Boulevards) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan, which allows uses as permitted in the RD1.5 and C1.5/R3, respectively, of the Los Angeles Municipal Code. As demonstrated in Finding Number 2, the proposed mixed use building conforms with the Specific Plan regulations as well as the Development Standards and Design Guidelines in conjunction with the Density Bonus. The proposed project provides a pedestrian oriented design by providing landscaped areas along all street frontages, and other street improvements such as public benches and bike racks. Furthermore, the ground floor facades are designed with highly transparent materials with vertically aligned storefront system and human scale, which further contribute to a pedestrian-friendly environment around the project site. Lastly, the proposed building incorporates a pedestrian walkway from the Hollywood Boulevard frontage which is where the building faces most street frontage.

The proposed height and density of the mixed-use development comply with the Specific Plan, in conjunction with the Density Bonus, and are compatible with adjacent development that range in uses from commercial buildings and multifamily residential buildings. The proposed project will be compatible in bulk, height and use with the existing development and includes a wide range of open space areas, amenities, which would contribute to the social well-being of its residents. Facade relief and articulation are achieved using various materials including stucco, glass and metal railing, and tiles and changes in the plane with projecting balconies. This not only breaks up the visual massing of the building but also maintains a connection with the activities on the street. Lastly, the project proposes a unit mix that consists of studios, one-bedrooms, and two-bedrooms, within proximity to a major transit stop and bus stations along major commercial corridors.

4. The project is consistent with and implements the affordable housing provisions of the Housing Element of the General Plan.

The project is consistent with and implements the affordable housing provisions of the Housing Element of the General Plan. The City's Housing Element for 2021-2029 was adopted by City Council on November 24, 2021 and June 14, 2022. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and

policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The Housing Element aims to provide affordable housing and amenity-rich, sustainable neighborhoods for its residents, answering the variety of housing needs of its growing population. Specifically, the Housing Element encourages units to accommodate all income groups.

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

The proposed project will provide a total of 86 residential dwelling units, reserving nine (9) units for Very Low Income Households and 2,596 square feet of commercial area on a site that is currently vacant. The project is proposing to utilize density bonus incentives to the development of additional affordable housing units. The project will provide needed housing in close proximity to job opportunities and an area well-served by public transportation. As such, the project is consistent with and implements the affordable housing provisions of the Housing Element.

5. The project contains the requisite number of Restrictive Affordable Units, based on the number of units permitted by the maximum allowable density on the date of application, as identified in LAMC Section 12.24 U.26(a)(2) of Chapter 1.

The City's Density Bonus Ordinance (Ordinance No. 179,581), codified in LAMC Section 12.22 A.25, permits a maximum density increase of up to 35 percent in exchange for setting aside 11 percent of the base density units for Very Low Income Households in accordance with the State Density Bonus Law (Government Code Section 65915). The State Density Bonus Law (Government Code Section 65915(n)) also allows a city to grant a density bonus greater than 35 percent for a development, if permitted by a local ordinance. The City adopted the Value Capture Ordinance (Ordinance No. 185,373), codified in LAMC Section 12.24 U.26, to permit a density increase greater than 35 percent with the approval of a Conditional Use.

In accordance with State Density Bonus Law (Government Code Section 65915 and Assembly Bill 2334), the Applicant is obtaining the base density allowance from the maximum allowable residential density permitted under the Zone, Specific Plan, or General Plan Land Use Designation. The project site is within the Hollywood Community Plan and Subarea A and Subarea B of the Vermont/Western SNAP Specific Plan. The proposed project is comprised of two different zones, RD1.5-1XL and [Q]C2-2D, within two different Subareas of the Vermont/Western SNAP, A (Neighborhood Conservation) and B (Mixed Use Boulevards), which have different by-right allowable maximum densities and FARs. Subarea A defers to the density and FAR permitted by the underlying zoning designation, or the RD1.5-1XL Zone. The RD1.5-1XL Zone permits one dwelling unit for every 1,500 square feet of lot area and permits a maximum FAR of 3:1. Subarea B permits residential uses permitted in the R3 Zone, and a maximum FAR of 2:1 for Mixed Use Projects. Based on the area regulations of each respective Subarea and corresponding zone where applicable, the Project Site allows for 60 units by-right.

Through the Conditional Use process, the Applicant seeks a Density Bonus increase of 42.5 percent to permit 86 residential units on-site. In exchange for the increased density, the Value Capture Ordinance requires projects to set aside one (1) additional percent of base density units above the 11 percent for Very Low Income Households for every

additional 2.5 percent density increase above the 35 percent. Below is a table showing the requisite percentage of affordable housing units for Very Low Income Households based on the percentage of density increase. In exchange for setting aside 42.5 percent of the base density, nine (9) units, for Very Low Income households, the project qualifies for a 42.5 percent density increase. The Applicant proposes to set aside nine (9) units for Very Low Income Households to be eligible for the 42.5 percent density increase.

<i>Very Low Income Units (Percentage of Base Density)</i>	<i>Maximum Density Bonus Permitted (Based on Base Density)</i>
5%	20%
6%	22.5%
7%	25%
8%	27.5%
9%	30%
10%	32.5%
11%	35%
12%	37.5%
13%	40%
14%	42.5%
15%	45%

Table 1: Extended Density Bonus Percentages from Chapter 1 of the LAMC Section 12.22 A.25

Therefore, the Proposed Project is consistent with the California Government Code Section 65915 and Assembly Bill 2334 as described in the table above, in addition to other findings as delineated.

6. The project meets any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3).

A No Net Loss Declaration dated February 14, 2024, confirms that no units are subject to replacement pursuant to the requirements of the Housing Crisis Act of 2019 (SB 330) and of 2021 (SB 8). The proposed project is a Housing Development project that does not involve the removal of any number of units, is not on a site that has removed any units within the past five (5) years, and where no units were subject to an Ellis Act withdrawal within the past 10 years. As such, the project meets the eligibility requirement for providing replacement housing consistent with California Government Code Sections 65915(c)(3) (State Density Bonus Law) and 66300 (Housing Crisis Act of 2019).

7. The project's Restrictive Affordable Units are subject to a recorded affordability restriction of 55 years from the issuance of the Certificate of Occupancy, recorded in a covenant acceptable to the Los Angeles Housing Department, and subject to fees as set forth in LAMC 19.14.

According to the Conditions of Approval, the owner is required to execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to reserve nine (9) units for Very Low Income households. The applicant is required to present a copy of the recorded

covenant to the Department of City Planning and the proposed project shall comply with any monitoring requirements established by LAHD. Therefore, as conditioned, the project satisfies this finding in regards to subjected restricted affordable units to recorded affordability per LAHD.

8. The project addresses the policies and standards contained in the City Planning Commission's Affordable Housing Incentives Guidelines.

The City Planning Commission approved the Affordable Housing Incentives Guidelines (CPC-2005-1101-CA) on June 9, 2005. These were subsequently approved by City Council (CF 05-1345) on February 20, 2008, as a component of the City of Los Angeles Density Bonus Ordinance. The Guidelines describe the density bonus provisions and qualifying criteria, incentives available, design standards, and the procedures through which projects may apply for a density bonus and incentives. The City of Los Angeles Housing Department (LAHD) utilizes these Guidelines in the preparation of Housing Covenants for Affordable Housing Projects. On April 9, 2010 the City Council adopted updates to the City's Density Bonus Ordinance (CF 05-1345-S1, Ordinance 181,142). However, at that time, the Affordable Housing Incentives Guidelines were not updated to reflect changes to the City's Density Bonus Ordinance. Therefore, where there is a conflict between the Guidelines and the current Density Bonus Ordinance, the Density Bonus Ordinance prevails. While many of the Guidelines are embedded within the City's Density Bonus Ordinance, there are some unique Guidelines, including design and location of affordable units to be comparable to the market rate units, the equal distribution of amenities, LAHD monitoring requirements, affordability levels, and procedures for obtaining LAHD sign-offs for building permits.

The Project requests a 42.5 percent density increase above the base density ([60 base units] plus [60 base units multiplied by 42.5 percent], results in 85.5 total units, which is rounded up to 86 units) in exchange for setting aside nine (9) units, or 14 percent of the 60 base density units, for Very Low Income Households. Given that the Project requests a 42.5 density bonus, and sets aside 14 percent of its base density, or nine (9) units, for Very Low Income Households, the Proposed Project is consistent with the California Government Code Section 65915(b), which the Affordable Housing Incentives Guidelines implement. Therefore, the Project complies with the City Planning Commission's Affordable Housing Incentives Guidelines.

DENSITY BONUS FINDINGS

The Applicant requests three (3) Incentives, as listed below:

- a. An **On-Menu Incentive** to average the floor area, density, open space, and parking over the project site, and to permit vehicular access from a less restrictive zone to a more restrictive zone.
- b. An **Off-Menu Incentive** to permit a 31 foot, six (6)-inch height increase in the SNAP Subarea A lot to permit a maximum building height of 69 feet, in lieu of a maximum height of 37 feet and 6 inches allowed in Section 7.D. of the SNAP.
- c. An **Off-Menu Incentive** to permit a 19-foot height increase to permit a maximum building height of 69 feet in lieu of 50 feet otherwise allowed in Section 8.B. of the SNAP.

Based upon the required set-aside of at least 15 percent, of the 60 base density units for Very Low Income Households, or nine (9) units, the Applicant is entitled to three (3) Incentives under

both Government Code and LAMC. The Applicant is providing nine (9) units for Very Low Income Households, or 15-percent of the base units. Therefore, the project qualifies for the proposed development's Incentives.

The following is a delineation of the findings related to the request for three (3) Incentives, pursuant to LAMC 12.22. A.25(g) and Government Code Section 65915. By law, the Commission shall approve a Density Bonus and requested Incentives unless the Commission makes a finding based on substantial evidence that:

9. The incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs for rents for the affordable units.

The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested incentives do not result in identifiable and actual cost reduction to provide for affordable housing costs per State Law. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25-percent gross income based on area median income thresholds dependent on affordability levels.

On-Menu Incentive for Averaging of Floor Area, Density, Open Space, Parking and Permitting Vehicular Access.

Averaging of Density

In accordance with State Density Bonus Law (Government Code Section 65915 and Assembly Bill 2334), the Applicant is obtaining the base density allowance from the maximum allowable residential density permitted under the Zone, Specific Plan, or General Plan Land Use Designation. The proposed project is comprised of two different zones, RD1.5-1XL and [Q]C2-2D, within two different Subareas of the Vermont/Western SNAP (Subarea A - Neighborhood Conservation and Subarea B - Mixed Use Boulevards), which have different by-right allowable maximum densities and FARs. Subarea A defers to the density and FAR permitted by the underlying zoning designation, or the RD1.5-1XL Zone. The RD1.5-1XL Zone permits one dwelling unit for every 1,500 square feet of lot area and permits a maximum FAR of 3:1. Subarea B permits residential uses permitted in the R3 Zone, and a maximum FAR of 2:1 for Mixed Use Projects. Pursuant to Density Based on the area regulations of each respective Subarea and corresponding zone where applicable, the Project Site allows for 60 units by-right. The breakdown of this information is shown in the following table:

Base Density							
	Subarea A			Subarea B			Total
Density Permitted By-Right							
	Lot Area	Density	Units	Lot Area	Density	Units	
RD1.5 Lot Area	6,746	1/1,500	4.49 = 5	-			5
[Q]C2 Lot Area	-			21,726	1/400	54.315	55
Total Units							60
Total Units w/ 42.5 percent Density Bonus							60 *1.425 = 85.5 = 86

The Applicant is proposing a total of 86 dwelling units in conjunction with a Conditional Use Permit to exceed the maximum density permitted in Chapter 1 of the LAMC Section 12.22

A.25. The proposed On-Menu Incentive to average the proposed density allows the entire development requirement for each individual zone and subarea to be allocated across the entire project site, thereby allowing for efficiency in construction and density.

Averaging of Floor Area

In conjunction with Density Bonus, the Applicant is requesting Floor Area Ratio (FAR) increases from the underlying zones and subareas to allow a 3:57:1 FAR across the entire site. The proposed On-Menu Incentive to average the proposed floor area allows the entire development requirement for each individual zone and subarea to be allocated across the entire project site, thereby allowing for efficiency in construction and density.

Averaging of Open Space

The 86-unit project includes 11 studio units with less than three (3) habitable rooms, 63 one-bedroom units with three (3) habitable rooms, and 12 two-bedroom units with more than three (3) habitable rooms. This results in a maximum 8,900 square feet of usable open space of which 50 percent of what is required within Subarea A and 25 percent of what is required within Subarea B must be located on the ground floor or first habitable room level. The Applicant is proposing 10,086 square feet of open space area through a common courtyard, recreation room, outdoor deck and private balconies. The proposed On-Menu Incentive to average the proposed open allows the entire development requirement for each individual zone and subarea to be allocated across the entire project site, thereby allowing for efficiency in construction and density.

Averaging of Parking and Vehicular Access

The proposed project includes a total of 93 automobile parking spaces with no spaces designated for guest parking which is consistent with the required parking for an 86-unit project using Assembly Bill (AB) 2097 located in the SNAP Subarea A and SNAP Subarea B within one-half mile of a transit stop. The parking lots will be accessed from one driveway on Berendo Street, located within Subarea A of the Vermont/Western SNAP Specific Plan. The proposed On-Menu Incentive to locate the proposed parking across the entire site in lieu of within the parcels with the corresponding zones and subareas only allows efficiency in construction and an identifiable cost reduction in providing for the affordable units. Permitting vehicular access from a less restrictive zone to a more restrictive zone will allow circulation throughout the project site.

Off-Menu Incentive for SNAP Subarea A (Neighborhood Conservation) Maximum Height. Section 7.D. of the SNAP states that the maximum height of any Project shall not exceed a height that is within 15 feet of the height of the shortest existing building on any adjacent lot. The shortest adjacent building at 1724 North Berendo Street, measures up to 22 feet and six (6) inches in height, allowing the project site a maximum height of 37 feet and six (6)-inches. However, the Applicant is seeking a Density Bonus Off-Menu Incentive of up to 31 feet and six (6)-inch increase in height to permit 69 feet of maximum building height. The incentive would enable the Applicant to build the market rate and affordable units by expanding the Project's building envelope so that the units being constructed are of sufficient size, configuration, and quality.

Off-Menu Incentive for SNAP Subarea B (Mixed Use Boulevards) Maximum Height. Section 8.B of the SNAP states that the maximum height of any building for a mixed-use project be limited to not exceed 50 feet in height. The Applicant requests a 19-foot height increase to permit a maximum building height of 69 feet in lieu of 50 feet otherwise allowed in Section 8.B. of the SNAP. The incentive would enable the Applicant to build the market

rate and affordable units by expanding the Project's building envelope so that the units being constructed are of sufficient size, configuration, and quality.

The requested incentives allow the developer to utilize more floor area on the ground floor for uses accessory elements for the residential units and provide for design efficiencies. These incentives support the Applicant's decision to set aside 15-percent of the 60 base units, that is nine (9) units, restricted to Very Low Income Households for 55 years.

- 10. The incentive(s) will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.**

There is no substantial evidence in the record that the proposed incentive(s) will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22 A.25(b)). As required by Section 12.22 A.25 (e)(2), the project meets the eligibility criterion that is required for density bonus projects. The project also does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Additionally, the Historic Resources Assessment prepared by Architectural Resources Group for the Class 32 Categorical Exemption, Case Number ENV-2024-4115-CE, and as accepted by the Los Angeles Office of Historic Resources in an email dated December 17, 2024. The project would not result in any substantial adverse changes to any historical resources within the vicinity of the project as defined in Section 15064.5(b) of the CEQA Guidelines. Therefore, there is no substantial evidence that the proposed incentive(s) will have a specific adverse impact on public health and safety.

- 11. The incentives are contrary to state or federal law.**

There is no evidence in the record that the proposed incentives are contrary to state or federal law.

- 12. The "waiver[s] or reduction[s] of development standards will not have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]" (Government Code Section 65915(e)(1)).**

A Density Bonus project may request other "waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]" (Government Code Section 65915(e)(1)).

Waiver of Development Standard – Floor Area: The proposed project is comprised of two different zones, RD1.5-1XL and [Q]C2-2D, within two different Subareas of the Vermont/Western SNAP, A (Neighborhood Conservation) and B (Mixed Use Boulevards), which have different by-right allowable maximum Floor Area Ratios (FAR). Subarea A defers to the Floor Area Ratio (FAR) permitted by the underlying zone. The RD1.5-1XL

Zone permits a maximum FAR of 3:1. The SNAP Subarea B permits a maximum FAR of 2:1 for Mixed Use Projects. The Applicant requests a 78.5 percent floor area increase to the 2:1 Floor Area Ratio (FAR) permitted in Subarea B of the Vermont/Western SNAP Specific Plan and a 19 percent floor area increase to the 3:1 FAR permitted in Subarea A of the Vermont/Western SNAP Specific Plan to allow a 3:57:1 FAR. As proposed, the granting of this waiver will allow the developer to expand the building envelope so that additional affordable units can be constructed, and the overall space dedicated to residential uses is increased. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. Thus, the denial of the requested waiver will have the result of physically precluding one or more affordable units.

Waiver of Development Standard – Transitional Height: Section 8.C. of the SNAP imposes height limitations for portions of buildings on a lot located within Subarea B of the SNAP when located within the following distances specified from an abutting lot in Subarea A:

SNAP Subarea B Transitional Height Limitations	
Distance	Height
0 to 49 feet	25 feet
50 to 99 feet	33 feet

The Applicant requests a Waiver of Development Standard to waive the transitional height limits otherwise required in Section 8.C. of the SNAP to allow an overall height of 69 feet. As proposed, the granting of this waiver will allow the developer to expand the building envelope so that additional affordable units can be constructed, and the overall space dedicated to residential uses is increased. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. Thus, the denial of the requested waiver will have the result of physically precluding one or more affordable units.

Waiver of Development Standard – Side Yard Setback: The proposed project is comprised of two different zones, RD1.5-1XL and [Q]C2-2D, within two different Subareas of the Vermont/Western SNAP, A (Neighborhood Conservation) and B (Mixed Use Boulevards), which have different setback limitations. SNAP Subarea B allows no setback requirements for mixed-use projects. SNAP Subarea A defers the setback requirements to the underlying zone, or the RD1.5-1XL, which requires a nine (9)-foot minimum side yard setback along the easterly side of the project site. The Applicant requests a Waiver of Development Standard for an up to 100% reduction in the minimum easterly side yard setback to permit 0 feet in lieu of the minimum nine (9)-feet required by LAMC Section 12.09.1.B.2. As proposed, the granting of this waiver will allow the developer to expand the building envelope so that additional affordable units can be constructed, and the overall space dedicated to residential uses is increased. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. Thus, the denial of the requested waiver will have the result of physically precluding one or more affordable units.

SPECIFIC PLAN PROJECT COMPLIANCE (SPPC) FINDINGS

- The project substantially complies with the applicable regulations, findings, standards, and provisions of the specific plan.**

Section 6. Land Use Regulations and Designation of Subareas

- a. **Parks First.** Section 6.F of the Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan requires the applicant to pay a Parks First Trust Fund of \$4,300 for each new residential unit, prior to the issuance of a Certificate of Occupancy. The proposed project includes the construction, use and maintenance of a new 6-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area resulting in a net increase of 86 dwelling units. The project is therefore required to pay a total of \$369,800 into the Parks First Trust Fund. The calculation of a Parks First Trust Fund fee to be paid or actual park space to be provided pursuant to the Parks First Ordinance shall be offset by the amount of any fee pursuant to LAMC Section 17.12 or dwelling unit construction tax pursuant to LAMC Section 21.10.1, et seq. This requirement is reflected in the Condition of Approval. As conditioned, the project complies with Section 6.F of the Specific Plan.

Section 7. Subarea A – Neighborhood Conservation

A portion of the project site (Lot 16) is located within Subarea A of the SNAP and is therefore subject to the provisions in Section 7 of the SNAP. The rest of the project site (Lots FR13 and FR 14) are located within Subarea B of the SNAP and are therefore subject to the provision in Section 8 of the SNAP.

- b. **Residentially Zoned Properties.** Section 7.A of the Vermont/Western Specific Plan states that residential uses allowed by the existing residential zoning classification of any lot located within Subarea A shall be permitted, provided that no more than two (2) lots have a total combined lot area of 15,000 square feet may be tied together to form a single building site. Furthermore, parking shall be prohibited in the required front yard areas. Lot 16 is zoned RD1.5-1XL, which allows density at a rate of one (1) unit for every 1,500 square feet of lot area. Lot 16 is approximately 6,746 square feet in size, allowing a maximum of five (5) dwelling units, which is consistent with the Hollywood Community Plan and Low Medium II Residential Land Use Designation. Lot 16 will be tied with Lots FR13 and FR 14, which are within Subarea B of the SNAP. The Applicant seeks an On-Menu Incentive to average the density over the entire project site within Subarea A and Subarea B and a Density Bonus increase of 42.5 percent from the base density in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. Therefore, as conditioned and in conjunction with Density Bonus, the project complies with Section 7.A. of the Specific Plan.
- c. **Commercially Zoned Properties.** Section 7.B of the Vermont/Western Specific Plan states that commercial uses on commercially zoned properties are limited to those uses defined as “Neighborhood Retail” and “Neighborhood Serving” in LAMC Section 13.07 and limited to the ground floor only. Lot 16 is not commercially zoned and does not propose commercial uses. Therefore, Section 7.B of the Specific Plan does not apply.
- d. **Schools, Child Care and Community Facilities.** Section 7.C of the Vermont/Western Specific Plan states that public or private schools, childcare facilities, parks, community gardens, community facilities, shall be permitted on any lot or lots provided that the building site for those uses has no more than two (2) acres of combined lot area. The project does not include any school, childcare or community facilities uses. Therefore, Section 7.C of the Specific Plan does not apply.
- e. **Maximum Height.** Section 7.D of the Vermont/Western Specific Plan states that the maximum height of any new building within Subarea A shall not exceed a height that is within 15 feet of the height of the shortest adjacent building on any adjacent lot within the same Subarea. The Specific Plan further stipulates that roofs and roof structures for the purposes specified in the Los Angeles Municipal Code (LAMC) Section 12.21.1 B.3

of the Code and architectural rooftop features may be erected up to 10 feet above the maximum height limit, if the structures and features are set back a minimum of 10 feet from the roof perimeter and screened from view at street level.

As seen in Exhibit 'A', Sheet A.000, the shortest adjacent building at 1724 North Berendo Street, measures up to 22 feet and six (6) inches in height. However, the Applicant is seeking a Density Bonus Off-Menu Incentive of up to 31 feet and six (6)-inch increase in height to permit 69 feet of maximum building height. The Applicant is proposing to reserve nine (9) units for Very Low Income Household occupancy.

Height Increase			
	SNAP Maximum Height Limit	With DB Incentive	Proposed Height
Overall Height	22'-6" + 15' = 37' 6"	37' 6" + 31' 6" = 69' (84% Increase)	69'

Therefore, as conditioned and in conjunction with the Density Bonus Waiver of Development Standard, the project complies with Section 7.D of the Specific Plan.

- f. **Building Setback.** Section 7.E of the Vermont/Western Specific Plan states that all buildings shall face a public street. The proposed development fronts along Berendo Street with a main pedestrian entrance located along the street frontage. Section 7.E. of the Vermont/Western Specific Plan also states that the exterior wall of the building frontage shall be located no closer to the street and no farther from the street than the exterior walls of the adjacent buildings within the same Subarea. The adjacent property to the north (1724 North Berendo Street) is located approximately 16 feet, six (6)-inches away from the front property line. The Applicant is proposing a 16-foot, six (6)-inch building setback on Lot 16. Therefore, the proposed project complies with Section 7.E of the Specific Plan.
- g. **Usable Open Space.** Section 7.F of the Vermont/Western Specific Plan states that residential Projects with two (2) or more dwelling units must provide specified amounts of common and private open space pursuant to the standards set forth in LAMC 12.21 G.2. The Specific Plan further stipulates that 50 percent of the total open space must be provided at ground level or first habitable room level of the project, and that roof decks 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. Units containing less than three (3) habitable rooms require 100 square feet of open space per unit. Units containing three (3) habitable rooms require 125 square feet of open space per unit. Units containing more than three (3) habitable rooms require 175 square feet of open space per unit. The Applicant seeks an On-Menu Incentive to average the proposed open space over the entire project site within Subarea A and Subarea B in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. The project consists of 11 studio units and 63 one-bedroom units with less than three (3) habitable rooms and 12 two-bedroom units with three (3) habitable rooms, thereby requiring a total of 8,900 square feet of required usable open space of which 4,450 square feet must be located at grade or first habitable room level. The minimum Usable Open Space requirement is shown in the table below:

Minimum Required Usable Open Space			
	Units	SF Required	Usable Open Space (SF)
Dwelling Units with Less than 3 Habitable Rooms	74	100	7,400

Dwelling Units with 3 Habitable Rooms	12	125	1,500
Dwelling Units with More than 3 Habitable Rooms	0	175	0
Total Minimum Required Usable Open Space			8,900
50% located at grade or first habitable room level			4,450

The Applicant is proposing 10,086 square feet of open space area through a common courtyard, recreation room, outdoor deck and private balconies, as shown in the table below:

Open Space	
Private	
Balconies – Level 2	1,139
Balconies – Level 3	947
Balconies – Level 4	947
Balconies – Level 5	947
Balconies – Level 6	753
Total	4,733
Common – Indoor	
Recreation Rooms – Level 2	1,677
Total	1,677
Common – Outdoor	
Outdoor Courtyard – Level 2	2,546
Outdoor Deck – Level 6	1,130
Total	3,676
Total Required Open Space	8,900
50% of Open Space at the First Habitable Room Level Required	4,450
Total Open Space Provided	10,086
50% of Open Space at the First Habitable Room Provided	5,362
Required planting area 25% of Common Open Space	2,225
Total Provided Planted Area	3,552

The project has been conditioned to construct the open space as illustrated in Exhibit 'A'. Therefore, as conditioned and in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with Section 7.F of the Specific Plan.

h. Project Parking Requirements.

- i. Automobile Parking.** Section 7.G.1 of the Vermont/Western Specific Plan sets forth a minimum and maximum parking standard for residential projects, as shown in the tables below:

SNAP Minimum Parking Spaces			
	Parking Space Per	Units	Parking Spaces

	Square Feet / Unit		
Dwelling Units with Less than 3 Habitable Rooms	1	11	11
Dwelling Units with 3 Habitable Rooms	1	63	63
Dwelling Units with More than 3 Habitable Rooms	1.5	12	18
Total Residential Required Spaces			92
Guest	.25	86	21
Total Minimum Required Spaces (inclusive of guest parking)			113

SNAP Maximum Parking Spaces			
	Parking Space Per Square Feet / Unit	Units	Parking Spaces
Dwelling Units with Less than 3 Habitable Rooms	1	11	11
Dwelling Units with 3 Habitable Rooms	1.5	63	94
Dwelling Units with More than 3 Habitable Rooms	2	12	24
Total Residential Allowed Spaces			129
Guest	.25	86	21
Total Maximum Allowed Spaces (inclusive of guest parking)			150

The Applicant proposes to utilize Assembly Bill (AB) 2097, which is a California law that prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop. As the proposed project is a mixed-use project and the site is located within half a mile of a major transit stop, the project qualifies for the parking reduction under the provisions of AB 2097. However, when parking is being proposed, a project is still subject to the maximum parking requirement per the SNAP. The SNAP limits the maximum number of automobile parking spaces to 150, inclusive of guest parking spaces. AB 2097 replaces the parking requirement in the Density Bonus and SNAP Parking requirements for residential projects. The Applicant is providing 87 residential parking spaces and zero guest parking spaces, thereby satisfying the maximum SNAP parking requirements. Additionally, the Project is conditioned to meet the Electric Vehicle charging spaces (EV Spaces) and Electric Vehicle Charging Stations (EVCS) regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC, to the satisfaction of the Department of Building and Safety. Any vehicular parking spaces that are provided above the LAMC requirement are conditioned to be provided with EV chargers to immediately accommodate electric vehicles within the parking areas. Therefore, as conditioned and in conjunction with the reduced residential parking spaces per AB 2097, the project complies with Section 7.G.1 of the Specific Plan.

- ii. **Bicycles.** Section 7.G.2 of the Vermont/Western Specific Plan requires any residential project with two (2) or more dwelling units to provide one-half (0.5) bicycle parking space per residential unit. The proposed development consists of 86 residential units, thus, requiring 43 bicycle parking spaces. The Applicant is proposing 43 residential bicycle parking spaces. Therefore, as proposed and conditioned, the project complies with Section 7.G.2 of the Specific Plan.

- i. **Conversion Requirements.** Section 7.H of the Vermont/Western Specific Plan sets forth requirements pertaining to the conversion of existing structures to residential condominium uses. The Applicant proposes the construction, use and maintenance of a new 6-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area with one (1) at-grade parking level and one (1) subterranean parking level. The project does not include the conversion of existing structures to residential condominium uses. Therefore, Section 7.H of the Specific Plan does not apply.
- j. **Development Standards.** Section 7.I of the Vermont/Western Specific Plan requires that all Projects be in substantial conformance with the following Development Standards and Design Guidelines.

Development Standards

1. **Landscaped Focal Point.** This Development Standard requires all new development projects to be designed around a landscaped focal point or courtyard. The applicant has submitted a Landscape Plan showing landscaped areas within surrounding the project site. The proposed project will be landscaped with trees such as Strawberry Tree, Shoe String Acacia Tree, and Maverick Thornless Mesquite tree. The shrubs proposed include European Grey Sedge, Pineapple Guava, and Angel Wing Jasmine. Therefore, the project complies with this Development Standard.
2. **Landscape Plan.** This Development Standard requires that all open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities shall be landscaped by lawns and other ground coverings. The applicant has submitted a Landscape Plan which includes a landscaped front yard and rear yard as described above. In addition, a Condition of Approval has been included requiring the applicant to provide a final landscape plan prepared by a licensed landscape architect. Therefore, as conditioned, the project complies with this Development Standard.
3. **Usable Open Space.** The Development Standards for common usable open space stipulate that no portion of the required common usable open space can have a dimension less than 20 feet and an overall minimum area less than 600 square feet for more than ten (10) dwelling units. The Development Standard further stipulates that private usable open space, such as balconies with a minimum dimension of six (6) feet, may reduce the required usable open space directly commensurate with the amount of private open space provided. As shown in the open space plans, the common open space areas provide more than the minimum area of 600 square feet and the minimum dimension of 20 feet.

The Applicant is proposing 10,086 square feet of open space area through a common courtyard, recreation room, outdoor deck and private balconies, as shown in the table below:

Open Space	
Private	
Balconies – Level 2	1,139
Balconies – Level 3	947
Balconies – Level 4	947
Balconies – Level 5	947
Balconies – Level 6	753

Total	4,733
Common – Indoor	
Recreation Rooms – Level 2	1,677
Total	1,677
Common – Outdoor	
Outdoor Courtyard – Level 2	2,546
Outdoor Deck – Level 6	1,130
Total	3,676
Total Required Open Space	8,900
50% of Open Space at the First Habitable Room Level Required	4,450
Total Open Space Provided	10,086
50% of Open Space at the First Habitable Room Provided	5,362
Required planting area 25% of Common Open Space	2,225
Total Provided Planted Area	3,552

The proposed project includes 5,353 square-feet of required common usable open space that meets the minimum dimension of 20 feet and the minimum area of 600 square feet as required by this Development Standard. The proposed project also includes 4,733 square feet of private open space area that meet the minimum dimension of six (6) feet. As designed, the required open space areas comply with this Development Standard.

4. **Street Trees.** This Development Standard requires one, 24-inch box shade tree to be planted and maintained in the public right-of-way for every 20 feet of street frontage. Lot 16 occupies approximately 50 feet of street frontage along the easterly side of Berendo Street. As such, three (3) street trees are required along the project site's public right-of-way. The Specific Plan requires the preservation of any existing Palm trees in the right of way and the project will be permitted to count any existing Palm trees towards the Specific Plan Street tree requirement. As seen in Exhibit A Sheet L.201, the proposed project includes three (3) new street trees along Lot 16 street frontage. The Development Standard further requires that an automatic irrigation system be provided within the tree well. The project is conditioned herein to provide a total of three (3) street trees in front of Lot 16 and an automatic irrigation system to the satisfaction of Bureau of Street Services, Urban Forestry Division. Therefore, as conditioned, the project complies with this Development Standard.
5. **Utilities.** The Development Standards require that 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. The Conditions of Approval require all proposed utilities on the project site to be placed underground. If underground service is not currently available, then provisions shall be made for future underground service. As conditioned, the project complies with this Development Standard.
6. **Pedestrian Access.** This Development Standard requires that pedestrian access shall be in the form of walks provided from the public street to the main building

entrance and that they provide a view into any existing interior courtyard or landscaped open area. The proposed development offers pedestrian access via a direct path to the building entrance along Berendo Street. The front yard and pathway are landscaped with shrubbery, trees, and groundcover. Therefore, the project complies with this Development Standard.

7. **Alley Access.** This Development Standard requires vehicle and pedestrian access from existing alleys or side streets to be preserved and enhanced. The subject site is not accessible via an alley. Therefore, this Development Standard does not apply.
8. **Curb Cuts.** This Development Standard allows no more than one curb cut per lot or 100 feet of lot frontage and further requires curb cuts to be a maximum of 20 feet in width unless more is required by the Department of Transportation (DOT) or the Department of Building and Safety (DBS). The project site comprises approximately 28,472 square feet of lot area with approximately 135 feet of street frontage along Hollywood Boulevard and approximately 210 feet street frontage along Berendo Street. Lot 16 occupies 50 feet of street frontage along the easterly side of Berendo Street. The Applicant is proposing the construction of one (1) new 20-foot curb cut for ingress and egress purposes. In addition, the Applicant seeks an On-Menu Incentive to permit vehicular access from a less restrictive zone to a more restrictive zone, in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. A Condition of Approval has been included to require only one curb cut that is 20 feet in width for every 100 feet of street frontage is allowed, unless otherwise required by the Departments of Public Works, Transportation, or Building and Safety. Therefore, in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with this Development Standard.
9. **Driveways.** This Development Standard requires that the first 25 feet in length of driveways to be constructed of Portland cement concrete, pervious cement, grass-crete, or any other porous surface that reduces heat radiation and/or increases surface absorption, thereby reducing runoff. The proposed development is accessible from Berendo Street. A Condition of Approval has been included requiring the first 25 feet in length of the driveway to be constructed of Portland cement concrete, pervious cement, grass-crete, or any other porous surface that reduces heat radiation and/or increases surface absorption, thereby reducing runoff. Therefore, as conditioned, the project complies with this Development Standard.
10. **Parking Lots and Structures.** This Development Standard requires surface parking lots, structures, garages and carports to be located at the rear of buildings. Furthermore, surface parking lots shall be paved with Portland cement concrete, pervious cement, grass-crete, or any other porous surface that will reduce the heat radiation and/or increase the surface absorption. The proposed project includes its residential parking spaces within one (1) at grade-level and one (1) subterranean parking level. The proposed parking spaces are not located within the front yard setback area. Therefore, the project complies with this Development Standard.
11. **Trash, Service Equipment and Satellite Dishes.** This Development Standard requires that trash, service equipment and satellite dishes to be located away from streets and enclosed or screened by landscaping, fencing or other architectural means. Additionally, the trash area shall be enclosed by a minimum six (6)-foot high decorative masonry wall. The Applicant proposes a recycling and trash

located at ground-level parking area. The plans submitted as part of this application do not indicate the location of service equipment and satellite dishes. In the event that any service equipment or satellite dishes are installed in the future, a Condition of Approval has been included requiring that they be located away from Carlton Way. Therefore, as conditioned, the project complies with this Development Standard.

- 12. Roofs and Rooftop Appurtenances.** This Development Standard requires that all rooftop equipment be screened from public view or architecturally integrated into the design of the building. In the event that additional rooftop mechanical equipment is proposed in the future, a Condition of Approval has been included requiring said equipment and ducts be screened from view from any street, public right-of-way, or adjacent property and the screening wall be solid and match the exterior materials, design, and color of the building. Therefore, as conditioned, the project complies with this Development Standard.
- 13. Roof Lines.** This Development Standard requires that all roof lines in excess of 40 feet in horizontal length must be broken up through the use of gables, dormers, plant-ons, cutouts or other appropriate means. As seen in Exhibit A, Sheet A.170, all roof lines are broken up to not exceed 40-foot increments. Moreover, the project has been conditioned to require all rooflines in excess of 40 feet to be broken up through the use of gables, dormers, plant-ons, cutouts, or other appropriate means. Therefore, as proposed and conditioned, the project complies with this Development Standard.
- 14. Privacy.** This Development Standard requires that buildings be arranged to avoid windows facing windows across property lines, or the private open space of other residential units. As seen in Exhibit A, Sheet G.031, Lot 16 abuts residential uses to the north of the project site. The Applicant has provided an elevation which depict the windows of existing adjacent structures to the north superimposed onto the proposed project. The elevation shows that some of the windows of adjacent residential properties will be marginally affected by the new construction. Given the constraints as an infill development located in an urbanized area, the Applicant has demonstrated efforts to arrange windows to avoid directly facing windows across property lines or private open space of other residential units. Therefore, the project complies with this Development Standard.
- 15. Façade Relief.** This Development Standard requires that all exterior building elevations, walls, or fences provide a break in the plane for every 20 feet in horizontal length, and every 15 feet in vertical length created by an architectural detail or a change in material. The Specific Plan further requires architectural treatments on the building front elevation to be continued on the sides and back of buildings. All facades of the proposed building on Lot 16 comply with the requirement by providing breaks in the plane through the use of varied building material, recessed windows, façade line treatments, and modulation along the elevations as seen in Exhibit A, Sheets A.200 and A.201. Therefore, the project complies with this Development Standard

Design Guidelines

- 16. General Building Design.** This Design Guideline recommends that buildings should be compatible in form with the existing neighborhood atmosphere. The surrounding area is currently developed with one- to four-story residential buildings and commercial uses. Through Density Bonus, the proposed project includes the

construction, use and maintenance of a new 6-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area resulting in a net increase of 86 dwelling units. The proposed project includes total of nine (9) units set aside for Very Low-Income Household occupancy. The building massing of multiple existing buildings along the block has a lot of coverage that takes up the majority of their subject lot(s). The proposed project will have a similar lot coverage as those found in the vicinity. Therefore, as conditioned and in conjunction with the Density Bonus, the project satisfies this Design Guideline.

17. **Architectural Features.** The Design Guidelines encourage courtyards, balconies, arbors, roof gardens, water features, and trellises. Appropriate visual references to historic building forms are encouraged in new construction. The proposed project provides balconies and other architectural features similar to the nearby single-family and multi-family dwellings surrounding the site. Furthermore, the street-facing elevation employs a variety of building materials and articulation by way of changes in building plane and materials. Therefore, the project complies with this Design Guideline.
18. **Shade.** This Design Guideline recommends that canopies, building overhangs and arbors be incorporated into the design of new structures to provide shade. The building includes projections along the facades such as overhangs, thus providing shade. Therefore, the project satisfies this Design Guideline.
19. **Building Color.** The Design Guidelines encourage buildings be painted three colors: a dominant color, a subordinate color and a “grace note” color. The Applicant proposes white as its dominant color, medium gray as the subordinate color and light gray as the grace note color. Therefore, the project satisfies this Design Guideline.

Section 8. Subarea B – Mixed Use Boulevards

A portion of the project site (Lots FR13 and FR 14) are located within Subarea B of the SNAP and are therefore subject to the provisions in Section 8 of the SNAP. The rest of the project site (Lot 16) is located within Subarea A of the SNAP and is therefore subject to the provisions in Section 7 of the SNAP.

- k. **Use.** Section 8.A of the Vermont/Western Specific Plan states that residential uses permitted in the R3 Zone by LAMC Section 12.10 and commercial uses permitted in the C1.5 Limited Commercial Zone by LAMC Section 12.13.5 shall be permitted by-right on any lot located within Subarea B of the Specific Plan area. The project site is comprised of Lot 16, which is in Subarea A and Lots FR13 and FR14, which are within Subarea B of the SNAP Specific Plan. Lots FR13 and FR14 are comprised of approximately 21,726 square feet of lot area and are zoned C2-1D, allowing a maximum of 55 dwelling units. Lots FR13 and FR 14 will be tied to Lot 16, which is within Subarea A of the SNAP. The Applicant seeks an On-Menu Incentive to average the density over the entire project site within Subarea A and Subarea B and a Density Bonus increase of 42.5 percent from the base density in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. Therefore, as conditioned and in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with Section 8.A of the Specific Plan.
- l. **Height and Floor Area.** Section 8.B of the Vermont/Western Specific Plan requires that a Mixed-Use Project shall not exceed 50 feet; except that roofs and roof structures for the purposes specified in Section 12.21.1 B.3 of the Code, may be erected up to 10 feet

above the height limit established in this section, if those structures and features are setback a minimum of 10 feet from the roof perimeter and are screened from view at street level by a parapet or a sloping roof. The proposed project includes the construction, use and maintenance of a new six (6)-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area.

The Applicant is seeking a Density Bonus Off-Menu Incentive of up to 19 feet increase in height to permit 69 feet of maximum building height, in lieu of the overall height limit of 50 feet for mixed-use buildings within Subarea B of the SNAP. In exchange, the Applicant is setting aside 15 percent, or nine (9) units, of the base 60 units for Very Low Income Household occupancy. As depicted in Exhibit "A", the Applicant proposes to comply with the stepback requirement per the SNAP which requires that no portion of any structure exceed 30 feet in height within 15 feet of the front property line, along Hollywood Boulevard. The SNAP height limitation and proposed height increase is shown in the following table:

Height Increase		
	SNAP Limitation	Proposed
SNAP Overall Height	50'	50' + 19' = 69'

Therefore, as conditioned and in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with the SNAP height regulation under Section 8.B of the Specific Plan.

With regards to Floor Area Ratio (FAR), a mixed-use project in Subarea B is required to not exceed a 2:1 FAR. However, the Applicant is seeking an On-Menu Incentive to average the proposed FAR over the entire project site within Subarea A and Subarea B in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. In addition, the Applicant is seeking a Waiver of Development Standard to allow a FAR increase of up to 3.57:1. The entire project site within Subarea A and Subarea B is comprised of 26,097 square feet of buildable area and the proposed building is 93,286 square feet, resulting in a 3.57:1 FAR. The proposed project includes 2,596 square feet of commercial floor area, resulting in a .09:1 FAR. The SNAP FAR limitation and proposed FAR increase is shown in the following table:

FAR Increase		
	SNAP Limitation	Proposed
Total FAR Mixed Use Project	2:1	2:1 + 78.5% = 3.57:1
Commercial FAR Mixed Use Project	1.5:1	.09:1

Therefore, as conditioned and in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with the SNAP FAR regulation under Section 8.B of the Specific Plan.

- m. Transitional Height.** Section 8.C of the Vermont/Western Specific Plan states that portions of buildings on a lot located within Subarea B adjoining or abutting a lot within Subarea A shall not exceed 25 feet in height and 33 feet in height when located within 0-49 feet and 50-99 feet, respectively. Lots FR13 and FR14 abut a Subarea A lot as

part of the proposed project site (Lot 16). The Applicant is seeking a Waiver of Development Standard to waive SNAP Subarea A transitional height limitations to allow a maximum height of 69 feet, in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. Therefore, as conditioned and in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with Section 8.C of the Specific Plan.

- k. Usable Open Space.** Section 8.D of the Vermont/Western Specific Plan states that residential projects with two or more dwelling units must provide specified amounts of common and private open space pursuant to the standards set forth in LAMC 12.21 G.2 of the Code. The Specific Plan further stipulates that up to 50 percent of the total open space may be located above the grade level or first habitable room level of the project, and that roof decks 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. Units containing less than three (3) habitable rooms require 100 square feet of open space per unit. Units containing three (3) habitable rooms require 125 square feet of open space per unit. Units containing more than three (3) habitable rooms require 175 square feet of open space per unit. The Applicant seeks an On-Menu Incentive to average the proposed open space over the entire project site within Subarea A and Subarea B in exchange for setting aside 15 percent of the base density, or nine (9) units for Very Low Income household occupancy. The project consists of 11 studio units and 63 one-bedroom units with less than three (3) habitable rooms and 12 two-bedroom units with three (3) habitable rooms, thereby requiring a total of 8,900 square feet of required usable open space of which 4,450 square feet must be located at grade or first habitable room level. The minimum Usable Open Space requirement is shown in the table below:

Minimum Required Usable Open Space			
	Units	SF Required	Usable Open Space (SF)
Dwelling Units with Less than 3 Habitable Rooms	74	100	7,400
Dwelling Units with 3 Habitable Rooms	12	125	1,500
Dwelling Units with More than 3 Habitable Rooms	0	175	0
Total Minimum Required Usable Open Space			8,900
50% located at grade or first habitable room level			4,450

The Applicant is proposing 10,086 square feet of open space area through a common courtyard, recreation room, outdoor deck and private balconies, as shown in the table below:

Open Space	
Private	
Balconies – Level 2	1,139
Balconies – Level 3	947
Balconies – Level 4	947
Balconies – Level 5	947
Balconies – Level 6	753
Total	4,733

Common – Indoor	
Recreation Rooms – Level 2	1,677
Total	1,677
Common – Outdoor	
Outdoor Courtyard – Level 2	2,546
Outdoor Deck – Level 6	1,130
Total	3,676
Total Required Open Space	
50% of Open Space at the First Habitable Room Level Required	4,450
Total Open Space Provided	
50% of Open Space at the First Habitable Room Provided	5,362
Required planting area 25% of Common Open Space	
Total Provided Planted Area	3,552

The project has been conditioned to construct the open space as illustrated in Exhibit 'A'. Therefore, as conditioned and in conjunction with the Density Bonus/Affordable Housing Incentives Program, the project complies with Section 8.D. of the Specific Plan.

n. Project Parking Requirements.

- i. **Automobile Parking.** Section 8.E of the Vermont/Western Specific Plan sets forth a minimum and maximum parking standard for residential projects, as shown in the tables below:

SNAP Minimum Parking Spaces			
	Parking Space Per Square Feet / Unit	Units	Parking Spaces
Dwelling Units with Less than 3 Habitable Rooms	1	11	11
Dwelling Units with 3 Habitable Rooms	1	63	63
Dwelling Units with More than 3 Habitable Rooms	1.5	12	18
Total <u>Residential</u> Required Spaces			92
Guest	.25	86	21
Total Minimum Required Spaces (inclusive of guest parking)			113

SNAP Maximum Parking Spaces			
	Parking Space Per Square Feet / Unit	Units	Parking Spaces
Dwelling Units with Less than 3 Habitable Rooms	1	11	11
Dwelling Units with 3 Habitable Rooms	1.5	63	94
Dwelling Units with More than 3 Habitable Rooms	2	12	24

Total <u>Residential</u> Allowed Spaces			129
Guest	.50	86	43
Total Maximum Allowed Spaces (inclusive of guest parking)			172

The Applicant proposes to utilize Assembly Bill (AB) 2097, which is a California law that prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop. As the proposed project is a residential project and the site is located within half a mile of a major transit stop, the project qualifies for the parking reduction under the provisions of AB 2097. However, the project is still subject to the maximum parking requirement per the SNAP. The SNAP limits the maximum number of automobile parking spaces to 172, inclusive of guest parking spaces. AB 2097 replaces the parking requirement in the Density Bonus and SNAP Parking requirements for residential projects. The Applicant is providing 87 residential parking spaces and no residential guest parking spaces, thereby satisfying the maximum SNAP parking requirements. Additionally, the Project is conditioned to meet the Electric Vehicle charging spaces (EV Spaces) and Electric Vehicle Charging Stations (EVCS) regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC, to the satisfaction of the Department of Building and Safety. Any vehicular parking spaces that are provided above the LAMC requirement are conditioned to be provided with EV chargers to immediately accommodate electric vehicles within the parking areas. Therefore, as conditioned and in conjunction with the reduced residential parking spaces per AB 2097, the project complies with Section 8.E.1 of the Specific Plan.

- ii. **Bicycles.** Section 8.E.2 of the Vermont/Western Specific Plan requires any residential project with two (2) or more dwelling units to provide one-half (0.5) bicycle parking space per residential unit. The proposed development consists of 86 residential units, thus, requiring 43 bicycle parking spaces. Furthermore, the SNAP requires one (1) parking space for every 1,000 square feet of commercial floor area for the first 10,000 square feet, and one (1) parking space for every additional 10,000 square feet of floor area thereafter. The project proposes 2,596 square feet of commercial floor area, thereby requiring two (2) commercial bicycle parking spaces. The Applicant proposes 49 residential bicycle parking spaces and eight (8) commercial bicycle parking spaces within a bicycle parking room located within the parking level. Therefore, the project is compliant with this provision of the SNAP.
- iii. **Commercial Parking.** Section 8.E.3 of the Vermont/Western Specific Plan requires two (2) parking spaces per 1,000 square feet of commercial floor area, which must be shared with any guest parking spaces being proposed. The proposed project includes 2,596 square feet of commercial floor area, thereby allowing a maximum of six (6) commercial parking spaces. The Applicant proposes six (6) commercial parking spaces which does not exceed the original maximum SNAP requirement of six (6) commercial spaces allowed. If guest parking spaces are designated at a later time, they must be shared with commercial spaces and cannot be in addition to guest parking spaces.

Therefore, as proposed and conditioned, the project complies with Sections 8.E.1, 8.E.2, and 8.E.3 of the Specific Plan.

- o. **Conversion Requirements.** Section 8.F of the Vermont/Western Specific Plan sets forth requirements pertaining to the conversion of existing structures to residential condominium uses. The proposed project includes the construction, use, and

maintenance of a six (6)-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area and nine (9) units restricted to Very Low Income Households. Therefore, Section 8.F of the Specific Plan does not apply.

- p. **Yards.** Section 8.G of the Vermont/Western Specific Plan specifies that no front, side or rear yard setbacks shall be required for the development of any project within Subarea B. The proposed project does not include any minimum required setbacks on Lots FR13 and FR14. Therefore, the new development complies with Section 8.G of the Specific Plan.
- q. **Pedestrian Throughways.** Section 8.H states that applicants shall provide one public pedestrian walkway, throughway, or path for every 250 feet of street frontage for the Project. The pedestrian throughway shall be accessible to the public and have a minimum vertical clearance of 12 feet and a minimum horizontal clearance of 10 feet. The proposed building occupies approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and 210 feet of frontage along the easterly side of Berendo Street. Therefore, Section 8.H. of the Specific Plan does not apply.
- r. **Development Standards.** Section 8.I of the Vermont/Western Specific Plan requires that all projects with new development and extensive remodeling be in substantial conformance with the following Development Standards and Design Guidelines.

Development Standards

- (1) **Landscape Plan.** The Development Standard for Subarea B requires that all open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities shall be landscaped by lawns and other ground coverings, allowing for convenient outdoor activity. All landscaped areas shall be landscaped in accordance with a landscape plan prepared by a licensed landscape architect, licensed architect, or licensed landscape contractor. The proposed project will be landscaped with trees such as Strawberry Tree, Shoe String Acacia Tree, and Maverick Thornless Mesquite tree. The shrubs proposed include European Grey Sedge, Pineapple Guava, and Angel Wing Jasmine. The Landscape Plan also shows the public right-of-way containing street trees to be approved by the Urban Forestry Division. Therefore, the project complies with this Development Standard.
- (2) **Usable Open Space.** This Development Standard requires that common usable open space must have a dimension of 20 feet when measured perpendicular from any point on each of the boundaries of the open space area and a minimum common open space area of 400 square feet for projects with less than 10 dwelling units and 600 square feet for projects with 10 dwelling units or more. Balconies shall have a minimum dimension of six feet. Common open space areas or balconies not meeting the minimum dimension requirements when measured perpendicular from any point on each of the boundaries of the open space area cannot be counted towards the square-footage allocated towards meeting the overall usable open space requirement. As shown in the open space plans, the common open space areas provide more than the minimum area of 600 square feet and the minimum dimension of 20 feet.

The Applicant is proposing 10,086 square feet of open space area through a common courtyard, recreation room, outdoor deck and private balconies, as shown in the table below:

Open Space

Private	
Balconies – Level 2	1,139
Balconies – Level 3	947
Balconies – Level 4	947
Balconies – Level 5	947
Balconies – Level 6	753
Total	4,733
Common – Indoor	
Recreation Rooms – Level 2	1,677
Total	1,677
Common – Outdoor	
Outdoor Courtyard – Level 2	2,546
Outdoor Deck – Level 6	1,130
Total	3,676
Total Required Open Space	8,900
50% of Open Space at the First Habitable Room Level Required	4,450
Total Open Space Provided	10,086
50% of Open Space at the First Habitable Room Provided	5,362
Required planting area 25% of Common Open Space	2,225
Total Provided Planted Area	3,552

The proposed project includes 5,353 square-feet of required common usable open space that meets the minimum dimension of 20 feet and the minimum area of 600 square feet as required by this Development Standard. The proposed project also includes 4,733 square feet of private open space area that meet the minimum dimension of six (6) feet. As designed, the required open space areas comply with this Development Standard.

- (3) **Streetscape Elements.** The Development Standards require that any project along Vermont Avenue, Virgil Avenue, Hollywood Boulevard between the Hollywood Freeway and Western, or referred to in the Barnsdall Park Master Plan, or projects along other major and secondary highways, to conform to the standards and design intentions for improvement of the public right-of-way. The project site is located along Hollywood Boulevard, a Major Highway, and Berendo Street, a Local Standard Street; therefore, the following Development Standards apply:

- i. **Street Trees.** The Development Standards require that one (1) 36-inch box shade tree be planted and maintained in the sidewalk for every 30 feet of street frontage. Lots FR13 and FR14 have approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 160 feet of frontage along the easterly side of Berendo Street. Hollywood Boulevard is a Major Highway. As such, five (5) street trees are required along the Hollywood Boulevard public right-of-way. Whether any existing street tree should remain or should be replaced is subject to the Bureau of Street Services, Urban Forestry Division. As seen on Sheet L.201, the Applicant is proposing one (1) new street tree and the maintenance of four (4) existing street trees along the Hollywood Boulevard public right-of-way.

The Applicant is also proposing seven (7) voluntary 24-inch box street trees along the Berendo Street public right of way fronting Lots FR13 and FR14. Therefore, as proposed and conditioned, the project complies with this Development Standard.

- ii. **Tree Well Covers.** The Development Standards require that a tree well cover be provided for each new and existing street tree in the project area. The project is required to provide a total of five (5) street trees along the Hollywood Boulevard public right-of-way, which include a tree well cover. Any existing trees, if they are to remain, shall provide a tree well cover. The project has been conditioned to require a total of five (5) new street trees along Hollywood Boulevard including a tree well cover for each tree. Therefore, as conditioned, the project complies with this Development Standard.
 - iii. **Bike Racks.** The Development Standards require one bike rack for every 50 feet of street frontage along a major highway. Lots FR13 and FR14 have approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 160 feet of frontage along the easterly side of Berendo Street. Hollywood Boulevard is a Major Highway. As such, three (3) bike racks are required along the Hollywood Boulevard public right-of-way. As seen on Sheet L.201, the Applicant is proposing four (4) bike racks along Hollywood Boulevard. The project has been conditioned to provide a minimum of three (3) bike racks along the Hollywood Boulevard public right-of-way. Therefore, as proposed and conditioned, the project complies with this Development Standard.
 - iv. **Trash Receptacles.** The Development Standards require one trash receptacle be provided in the public right of way for every 100 feet of lot frontage along a Major or Secondary Highway. Lots FR13 and FR14 have approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 160 feet of frontage along the easterly side of Berendo Street. Hollywood Boulevard is a Major Highway. As such, two (2) trash receptacles are required along the Hollywood Boulevard public right-of-way. The Applicant proposes two (2) trash receptacles along Hollywood Boulevard. Furthermore, the project has been conditioned to provide a total of two (2) trash receptacles along the Hollywood Boulevard public right-of-way. Therefore, as proposed and conditioned, the project complies with this Development Standard.
 - v. **Public Benches.** The Development Standards require that one public bench be provided in the public right of way for every 250 feet of lot frontage on a Major or Secondary Highway. Lots FR13 and FR14 have approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 160 feet of frontage along the easterly side of Berendo Street. Hollywood Boulevard is a Major Highway and Berendo Street is a Local Street. Hollywood Boulevard has less than 250 feet of lot frontage. As such, the project has been conditioned to provide a total of one (1) public bench along the Hollywood Boulevard public right-of-way. Therefore, as proposed and conditioned, the project complies with this Development Standard.
- (4) **Pedestrian/Vehicular Circulation.** The Development Standards require that projects fronting on a main commercial street shall avoid pedestrian/vehicular conflicts by adhering to standards related to parking lot location, curb cuts,

pedestrian entrances, pedestrian walkways and speed bumps. The subject property fronts along Berendo Street, a residential street and Hollywood Boulevard, a commercial street. Therefore, the following Development Standards apply.

- i. **Parking Lot Location.** The Development Standards require that surface parking lots be placed at the rear of structures. The project does not propose a surface parking lot, but rather vehicle parking within one (1) at grade parking level and one (1) subterranean parking level which are enclosed. Therefore, this Development Standard does not apply.
- ii. **Waiver.** The Director of Planning 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. The proposed project does not have access to an alley or public street at the rear. Therefore, this Development Standard does not apply.
- iii. **Curb Cuts.** The Development Standards allow one curb cut that is 20 feet in width for every 150 feet of street frontage when a project takes its access from a Major or Secondary Highway, unless otherwise required by the Departments of Public Works, Transportation or Building and Safety. The Applicant proposes the project's vehicle ingress and egress along Berendo Street, which is considered a Local Standard Street and within Subarea A of the SNAP Specific Plan. Therefore, this Development Standard does not apply.
- iv. **Pedestrian Entrance.** The Development Standards require that all buildings that front on a public street shall provide a pedestrian entrance at the front of the building. As shown on "Exhibit A" the Applicant proposes a main pedestrian lobby entrance and commercial entrances along Hollywood Boulevard. Therefore, the project complies with this Development Standard.
- v. **Design of Entrances.** The Development Standards require that entrances be located in the center of the façade or symmetrically spaced if there are more than one and be accented by architectural elements such as columns, overhanging roofs or awnings. The lobby entrance for the project is located towards at the corner of Hollywood Boulevard and Berendo Street and will primarily lead residents from the street to the lobby area. The commercial entrances are located along the Hollywood Boulevard frontage which will lead the pedestrians along Hollywood Boulevard directly into the commercial spaces. This placement assures that the residential entrance and commercial entrance are opposite from the vehicle entrance. Therefore, as proposed, the project complies with this Development Standard.
- vi. **Inner Block Pedestrian Walkway.** The Development Standards require that applicants provide a pedestrian walkway, thoroughway or path for every 250 feet of street frontage for a project. The pedestrian path or thoroughway shall be provided from the rear property line or from the parking lot or public alley or street if located to the rear of the project, to the front property line. The pedestrian walkway shall be accessible to the public and have a minimum vertical clearance of twelve feet, and a minimum horizontal clearance of ten feet. Lots FR13 and FR14 have approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 160 feet of frontage along the easterly side of Berendo Street. Hollywood

Boulevard is a Major Highway. Therefore, this Development Standard does not apply.

- vii. **Speed Bumps.** The Development Standards require speed bumps be provided at a distance of no more than 20 feet apart when a pedestrian walkway and driveway share the same path for more than 50 lineal feet. The proposed project does not contain a pedestrian walkway and driveway that share the same path for more than 50 lineal feet. Therefore, as proposed, this Development Standard does not apply.
- (5) **Utilities.** The Development Standards require that 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. The project does not propose any installation of new utility service at this time. However, in the event new utility lines are to be installed on the site, the Conditions of Approval require all new utility lines which directly service the lot or lots shall be installed underground. If underground service is not currently available, then provisions shall be made for future underground service. Therefore, as conditioned, the project complies with this Development Standard.
- (6) **Building Design.** The purpose of the following provisions is to ensure that a project avoids large blank expenses 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:
- i. **Stepbacks.** The Development Standards require that 1) no portion of any structure exceed more than 30 feet in height within 15 feet of the front property line, and 2) that 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. Lots FR13 and FR14 have approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 160 feet of frontage along the easterly side of Berendo Street. Hollywood Boulevard is a Major Highway. Therefore, the proposed project is subject to both SNAP stepback requirements along Hollywood Boulevard. As seen on Sheet A.201 of "Exhibit A", the project satisfies Stepback No. 1 and 2. Therefore, as proposed, the project complies with this Development Standard.
 - ii. **Transparent Building Elements.** The Development Standards require that transparent building elements such as windows and doors occupy at least 50 percent of the ground floor facades on the front and side elevations and 20 percent of the surface area of the rear elevation of the ground floor portion which has surface parking in the rear of the structure. Moreover, a "side elevation ground floor façade" has been interpreted by Staff to only mean those facades which face a street or alley and not facades along interior lot lines that face other buildings. Lots FR13 and FR14 have a southern elevation that faces Hollywood Boulevard, a western elevation that faces Berendo Street, and an eastern elevation that faces an interior lot. The project's northern elevations are located on Lot 16 and are within Subarea A of the SNAP; therefore, SNAP transparency does not apply to Lot 16. As seen on Exhibit A, Sheet G.032, the proposed project is providing at least 50% transparency along the western and southern facades that are within Subarea B of the SNAP. A Condition of Approval has been included to

require Lots FR13 and FR14 to provide at least 50% of the exterior surface of the ground floor façade along the western and southern elevations with transparent building materials. Therefore, as proposed and conditioned, the project complies with this Development Standard.

- iii. **Façade Relief.** The Development Standards require that exterior walls provide a break in plane for every 20 feet horizontally and every 30 feet vertically. As seen in “Exhibit A” the project proposes horizontal and vertical plane breaks through the use of the façade incrementally stepped away from the street, change in material, recessed windows, balconies, transparency, and lineal orientation of the façade construction. Therefore, the project complies with this Development Standard.
 - iv. **Building Materials.** The Development Standards require that building facades be comprised of at least two types of complimentary building materials. As seen in “Exhibit A”, Sheet A.203, the project proposes the use of white acrylic plaster, concrete, and metal guardrails on all elevations of the structure. Therefore, the project complies with this Development Standard.
 - v. **Surface Mechanical Equipment.** The Development Standards require that all surface or ground mounted mechanical equipment be screened from public view and treated to match the materials and colors of the building which they serve. The plans reflect a transformer underground within the proposed building. Moreover, the project has been conditioned to require any surface mechanical equipment to match the colors and materials of the building which they serve and be screened from public view. Therefore, as proposed, and conditioned, the project complies with this Development Standard.
 - vi. **Roof Lines.** The Development Standards require that all rooflines in excess of 40 feet are broken up through the use of gables, dormers, plant-ons, cutouts, or other appropriate means. As seen in Exhibit A, Sheet A,170, all roof lines are broken up to not exceed 40-foot increments. A Condition of Approval has been included to enforce this requirement. Moreover, the project has been conditioned to require all rooflines in excess of 40 feet to be broken up through the use of gables, dormers, plant-ons, cutouts, or other appropriate means. Therefore, as proposed and conditioned, the project complies with this Development Standard.
- (7) **Rooftop Appurtenances.** The Development Standards require that all rooftop equipment and building appurtenances shall be screened from public view or architecturally integrated into the design of the building. The proposed project will have some mechanical equipment placed on the roof. A Condition of Approval has been included requiring said equipment and ducts be screened from view from any street, public right-of-way or adjacent property and the screening shall be solid and match the exterior materials, design and color of the building. Therefore, as conditioned, the project complies with this Development Standard.
- (8) **Trash and Recycling Areas.** The Development Standards require that trash storage bins be located within a gated, covered enclosure constructed of identical building materials, be a minimum of six feet high, and have a separate area for recyclables. The proposed project provides a trash and recycle enclosure located

within the parking level. Therefore, the project complies with this Development Standard.

- (9) **Pavement.** The Development Standards require that paved areas not used as parking and driveway areas consist of enhanced paving materials such as stamped concrete, permeable paved surfaces, tile, and/or brick pavers. The project site does not currently contain areas not being used as parking and driveway access that would require enhance paving at the ground level. Therefore, as conditioned, the project complies with this Development Standard.
- (10) **Freestanding Walls.** The Development Standards require that all freestanding walls contain an architectural element at intervals of no more than 20 feet and be set back from the property line adjacent to a public street. The applicant does not propose any freestanding walls. In the event that a freestanding wall is proposed in the future, a Condition of Approval has been included to require an architectural element at intervals of no more than 20 feet and be set back from the property line adjacent to a public street. As proposed and conditioned, the project complies with this Development Standard.
- (11) **Parking Structures – Required Commercial Frontage.** The Development Standards require that 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. This Development Standard applies to standalone parking structures, which the Applicant does not propose. Therefore, this Development Standard does not apply.
- (12) **Parking Structures – Façade Treatments.** The Development Standards require parking structures be designed to match the style, materials and colors of the main building. This Development Standard applies to standalone parking structures, which the Applicant does not propose. Therefore, this Development Standard does not apply.
- (13) **Parking Structures Across from Residential Uses.** The Development Standards require parking structures abutting or directly across an alley or public street from any residential use or zone conform to standards regarding the façade facing the residential use or zone. This Development Standard applies to standalone parking structures, which the Applicant does not propose. Therefore, this Development Standard does not apply.
- (14) **Surface Parking Lots.** The Development Standards require at least 10 percent of the surface parking lot to be landscaped with one (1) 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 behind a three-foot landscaped buffer. The trees shall be located so that an overhead canopy effect is anticipated to cover at least 50 percent of the parking area after 10 years of growth. The Applicant does not propose a surface parking lot. The proposed parking area is located within one (1) at grade parking level and one (1) subterranean parking level, which will be enclosed. Therefore, this Development Standard does not apply.
- (15) **Surface Parking Abutting Residential.** The Development Standards require surface parking abutting or directly across an alley or public street from any residential use or zone conform to standards regarding a decorative wall and landscaping buffer. The Applicant does not propose a surface parking lot. The

proposed parking area is located within one (1) at grade parking level and one (1) subterranean parking level, which will be enclosed. Therefore, this Development Standard does not apply.

- (16) **On-Site Lighting.** The Development Standards require that the project include on-site lighting along all vehicular and pedestrian access ways. The Development Standards specify that the acceptable level of lighting intensity is $\frac{3}{4}$ foot-candle of flood lighting measured from the ground, a maximum mounting height of light sources shall be 14 feet, and “white” color corrected lamp color shall be used for ground level illumination. A Condition of Approval has been included to ensure that any lighting shall meet the on-site lighting standards mentioned above. Therefore, as conditioned, the project complies with this Development Standard.
- (17) **Security Devices.** The Development Standards require security devices to be screened from public view. The proposed project does not contain any type of security devices at this time. In the event that additional security devices are installed in the future, a Condition of Approval has been included requiring all proposed devices to be integrated into the design of the building, concealed and retractable. Therefore, the project complies with this Development Standard.
- (18) **Privacy.** The Development Standards require that buildings be arranged to avoid windows facing windows across property lines, or the private open space of other residential units. The project site is not directly facing any existing residential units. Therefore, this Development Standard does not apply.
- (19) **Hours of Operation.** The Development Standards require that parking lot cleaning and sweeping, trash collection and deliveries be limited between 7:00 a.m. - 8:00 p.m. Monday through Friday, and 10:00 a.m. - 4:00 p.m. on Saturdays and Sundays. The Applicant has been required in the Conditions of Approval to comply with this Development Standard. Therefore, as conditioned, the project complies with this Development Standard.
- (20) **Noise.** Any dwelling unit exterior wall including windows and doors having a line of sight to a public street or alley shall be constructed 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 proposed building has multiple windows on two facades with a line of sight directly to Hollywood Boulevard and Hillhurst Avenue. A Condition of Approval has been included requiring any dwelling unit exterior wall including windows and doors having a line of sight to a public street or alley to be constructed 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. Therefore, as conditioned, the project complies with this Development Standard.
- (21) **Required Ground Floor Uses.** The Development Standards states that any residential, commercial facility, or commercial use permitted by the Specific Plan Ordinance is allowed on the ground floor and second floor within Subarea B. Lots FR13 and FR14 include 2,596 square feet of commercial floor area along the ground floor. Therefore, the project complies with this Development Standard.

Design Guidelines

- (22) **Urban Form.** The Design Guidelines encourage transforming commercial streets away from a highway oriented, suburban format into a distinctly urban, pedestrian

oriented and enlivened atmosphere by providing outdoor seating areas, informal gathering of chairs, and mid-block pedestrian walkways. The Guidelines also indicate that streets should begin to function for the surrounding community like an outdoor public living room and that transparency should exist between what is happening on the street and on the ground floor level of the buildings. The project is designed to enhance the pedestrian experience along Hollywood Boulevard by providing over 50 percent transparency increasing visibility into the ground floor from the street and adding commercial spaces. The project has also been conditioned to include bike racks, shade trees, trash receptacles, and a public bench along the Hollywood Boulevard public right-of-way. Therefore, as proposed and conditioned, the project complies with this Design Guideline.

- (23) **Building Form.** The Design Guidelines encourage every building to have a clearly defined ground plane, roof expression and middle or shaft that relates the two. The ground plane of the project is defined by facades that consist of glass, concrete, and metal. The upper floors are defined by various planes that consist of different material, windows, and projections. The roof plane varies in height and material, which adds articulation to the building. Therefore, as proposed, the project complies with this Design Guideline.
- (24) **Architectural Features.** The Design Guidelines encourage courtyards, balconies, arbors, roof gardens, water features, and trellises. Appropriate visual references to historic building forms – especially Mediterranean traditions – are encouraged in new construction. The proposed project provides multiple private balconies from the second floor to the sixth floor. Furthermore, all street-facing elevations employ a variety of building materials and articulation by way of changes in building plane, and transparency. Therefore, the project complies with this Design Guideline.
- (25) **Building Color.** The Design Guidelines encourage buildings be painted three colors: a dominant color, a subordinate color and a “grace note” color. The Applicant proposes white as its dominant color, medium gray as the subordinate color and light gray as the grace note color. Therefore, the project complies with this Design Guideline.
- (26) **Signs.** The Design Guidelines provide extensive guidance related to the placement, type, and style of signage to be used for projects. The Guidelines identify appropriate signs for the Specific Plan area to include wall signs, small projecting hanging signs, awnings or canopy signs, small directory signs, and window signs. Any pole, roof or off-site sign, any sign containing flashing, mechanical or strobe lights (digital signs) are prohibited. The applicant does not propose signs as part of this application. However, all future signs shall be reviewed by Project Planning staff for compliance with the Vermont/Western SNAP and Design Guidelines. Filing for a Project Compliance shall not be necessary unless a Project Adjustment, Project Exception, or Project Amendment is required. Therefore, as conditioned, the project complies with this Design Guideline.
- (27) **Plant Materials on Facades.** The Design Guidelines encourage facade plant materials in addition to permanent landscaping. Plants can be arranged in planters, containers, hanging baskets, flower boxes, etc. The Applicant does not propose any plant materials on the building facades. Therefore, this Design Guideline does not apply.

14. The project complies with CEQA.

The Department of City Planning determined that the City of Los Angeles Guidelines for the implementation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject Project as Categorically Exempt under Section 15332 (Class 32, In-Fill Development Project), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

See Justification for Categorical Exemption Case No. ENV-2024-4115-CE in the case file for the narrative demonstrating that exceptions do not apply.

PROJECT REVIEW FINDINGS

15. The Project substantially conforms to the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable Specific Plan.

The General Plan sets forth goals, objectives, and programs that serve as the foundation for all land use decisions. The City of Los Angeles' General Plan consists of the Framework Element, seven State-mandated Elements including Land Use, Mobility, Housing, Conservation, Noise, Safety, and Open Space, and optional Elements including Air Quality, Service Systems and Plan for a Healthy Los Angeles. The Land Use Element is comprised of 35 community plans that establish parameters for land use decisions within those communities of the City.

Framework Element

The Framework Element for the General Plan (Framework Element) was adopted by the Los Angeles City Council on December 11, 1996, and re-adopted on August 8, 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element of the General Plan establishes general policies for the City of Los Angeles based on projected population growth. Land use housing, urban form and neighborhood design, open space, economic development, transportation, infrastructure, and public services are all addressed in the context of accommodating future City-wide population increases. The City's various land use "categories" are defined based on appropriate corresponding development standards including density, height, and use. The proposed development is consistent with the following goals, objectives, and policies of the Framework Element:

- Objective 3.1 : Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.
- Objective 3.4: 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.
- Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.
- GOAL 3: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.

- Policy 3.9.6: Require that commercial and mixed-use buildings located adjacent to residential zones be designed and limited in height and scale to provide a transition with these uses, where appropriate.
- Policy 3.9.7: Provide for the development of public streetscape improvements, where appropriate.

Figure 3-1 Metro Long Range Land Use Diagram of the Framework Element indicates that the project site is located within a Community Center, which is described as a focal point for surrounding residential neighborhoods and containing a diversity of uses such as small offices and cultural and entertainment facilities, in addition to neighborhood oriented services. A mixed-use center that encourages the development of housing in concert with the multi-use commercial uses is one of the two types that the Framework Element identifies. Generally, community centers range from FAR of 1.5:1 to 3:1. Physically, the scale and density of community centers would be greater than the neighborhood districts, generally with building heights ranging from two to six stories depending on the character of the surrounding area.

The proposed project includes the construction, use and maintenance of a new 6-story, 86-unit mixed-use building with approximately 2,596 square feet of commercial floor area. The commercial spaces will mainly front Hollywood Boulevard. The commercial spaces on the ground floor will provide a variety of uses for the surrounding residential neighborhood. Furthermore, the proposed mixed-use, in conjunction with Density Bonus, meets the goals and objectives for a Community Center area under the Framework Element. The project site is comprised of 28,472 square feet of lot area and the proposed building contains a combined floor area of 93,286 square feet, resulting in a FAR of 3.57:1 FAR, which is a 78.5 percent floor area increase to the 2:1 Floor Area Ratio (FAR) permitted in Subarea B of the Vermont/Western SNAP Specific Plan and a 19 percent floor area increase to the 3:1 FAR permitted in the RD1.5-1XL Zone through Density Bonus, in exchange for setting aside nine (9) units for Very Low Income Households. The proposed building is designed at six (6) stories above grade with a 69-foot height measured at the roof parapet. The adjacent properties have heights that range from one to four stories. As such, the project is consistent with objective, goals and policies in a Community Center of the Framework Element.

Hollywood Community Plan

The subject property is located within the boundaries of the Hollywood Community Plan, which establishes land use designations and planning policies for the area. An updated Hollywood Community Plan was adopted by City Council on May 9, 2023, and became operative on February 11, 2025. The project application was filed before February 11, 2025, as a Vesting Housing Crisis Act project. Therefore, the project is vested to the local planning and zoning rules that were in place at the time the Vesting Housing Crisis Act application was submitted, or on April 11, 2024. Therefore, the project is not subject to the new Hollywood Community Plan and its Community Plan Implementation Overlay.

The Hollywood Community Plan designates the RD1.5-1XL zoned parcel for Low Medium II Residential land uses, which correspond to RD2 and RD1.5 Zones. The two (2) [Q]C2-2D zoned parcels are designated for Highway Oriented Commercial land uses, which correspond to C1, C2, P, RAS3, and RAS4 zones. The proposed 86-unit mixed use building complies with both the intent and provisions of the General Plan and Hollywood Community Plan area.

The Hollywood Community Plan, a part of the General Plan's Land Use Element, sets various goals and objectives for the planning and development of the area, and creates a vision for the growth and development of the area. While the plan is silent on specific land uses and conditional uses, the Hollywood Community Plan states the following goal, objectives, and policies:

- Objective 1: To further the development of Hollywood as a major center of population, employment, retail services, and entertainment [...].
- Objective 3: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.
- Objective 3.4: Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.
- Standards and Criteria (Commerce): [...]. Future development should be compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system. Developments combining residential and commercial uses are especially encouraged in this Center area.
- Standards and Criteria (Housing): New apartments should be soundproofed and should be provided with adequate usable open space at a minimum ratio of 100 square feet per dwelling unit excluding parking areas, driveways and the required front yard setback.

The proposed mixed-use development is in an area that is close to a major transit station and various bus routes, connecting the project site to other regional and local destinations as well as employment centers and retail services. The proposed project will contribute to the Hollywood area as a medium- to high-density mixed-use development that provides housing, employment, and retail services for residents and visitors of the area. Furthermore, the project has been conditioned 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, for any dwelling units with their exterior wall having a line of sight to a public street or alley. This will meet the Standards and Criteria of the Hollywood Community Plan to soundproof new apartments. In addition, the proposed project includes adequate usable open space at a ratio of 100 square feet per dwelling unit or more, pursuant to the Chapter 1 of the LAMC Section 12.21 G.2.

Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan

The Vermont/Western SNAP Specific Plan was adopted by the Los Angeles City Council and became effective on March 1, 2001. The proposed project meets the following purposes of the SNAP as outlined in Section 2 of the Specific Plan:

- 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.
- 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.

- H. Promote increased flexibility in the regulation of the height and bulk of buildings as well as the design of sites and public streets in order to ensure a well-planned combination of commercial and residential uses with adequate open space.

The project site is located within Subarea A (Neighborhood Conservation) and Subarea B (Mixed Use Boulevards) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan, which allows uses as permitted in the RD1.5 and C1.5/R3, respectively, of the Los Angeles Municipal Code. As demonstrated in Finding Number 2, the proposed mixed use building conforms with the Specific Plan regulations as well as the Development Standards and Design Guidelines in conjunction with the Density Bonus. The proposed project provides a pedestrian oriented design by providing landscaped areas along all street frontages, and other street improvements such as public benches and bike racks. Furthermore, the ground floor facades are designed with highly transparent materials with vertically aligned storefront system and human scale, which further contribute to a pedestrian-friendly environment around the project site. Lastly, the proposed building incorporates a pedestrian walkway from the Hollywood Boulevard frontage which is where the building faces most street frontage.

The proposed height and density of the mixed-use development comply with the Specific Plan, in conjunction with the Density Bonus, and are compatible with adjacent development that range in uses from commercial buildings and multifamily residential buildings. The proposed project will be compatible in bulk, height and use with the existing development and includes a wide range of open space areas, amenities, which would contribute to the social well-being of its residents. Facade relief and articulation are achieved using various materials including stucco, glass and metal railing, and tiles and changes in the plane with projecting balconies. This not only breaks up the visual massing of the building but also maintains a connection with the activities on the street. Lastly, the project proposes a unit mix that consists of studios, one-bedrooms, and two-bedrooms, within proximity to a major transit stop and bus stations along major commercial corridors.

- 16. 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.**

The proposed six (6)-story, 86-unit mixed use building is consistent and compatible with existing and future development on neighboring and other properties within proximity, which is generally developed with commercial and residential uses. Furthermore, the proposed project includes architectural features that vary and articulate the building façade and incorporates a variety of colors and materials. The proposed project also includes a variety of architectural elements such as projecting balconies, recessed windows and changes in the building plane.

Height

The project site is comprised of one (1) parcel that is zoned RD1.5-1XL and is within Subarea A (Neighborhood Conservation) of the Vermont/Western SNAP Specific Plan and two (2) parcels that are zoned [QJC2-2D and are within Subarea B (Mixed Use Boulevards) of the Vermont/Western SNAP Specific Plan. The SNAP Subarea A restricts maximum height to 15 feet above the shortest adjacent primary building within a Subarea A lot and

additional transitional height limitations for lots in other SNAP Subareas. The SNAP Subarea B restricts the maximum building height for mixed-use projects to 50 feet. In conjunction with Density Bonus, the proposed 86-unit, mixed-use building is designed at six (6) stories above grade with a 69-foot height measured at the roof parapet. The adjacent properties have heights that range from one to four stories. As such, the height of the proposed mixed use building is compatible with the surrounding structures.

Bulk/Massing

The proposed six (6)-story, 86-unit mixed use building is located with approximately 135 feet of frontage along the northerly side of Hollywood Boulevard and approximately 210 feet of frontage along the easterly side of Berendo Street. The project site has a height district of 1XL and 2D but is within Subarea A (Neighborhood Conservation) and Subarea B (Mixed Use Boulevards) of the Vermont/Western SNAP Specific Plan area, which imposes height limitations for properties within an adjoining Subarea A and a 50-foot height limitation for mixed-use projects within Subarea B. In conjunction with Density Bonus, the Applicant proposes a six (6)-story, 86-unit mixed-use building with a maximum height of 69 feet. The Applicant is requesting height increases from the SNAP Subarea A and Subarea B limitations as well as a Waiver of Development Standard and On-Menu Incentive for the increase and averaging of Floor Area Ratio (FAR) to allow the 69-foot in height mixed use building with a 3.57:1 FAR.

Building Materials

As recommended in the Citywide Design Guidelines, the Project incorporates a variety of building materials and architectural features. The Project includes an aluminum storefront, glass guardrails and white and gray acrylic plaster. The Applicant proposes white as its dominant color, medium gray as the subordinate color and light gray as the grace note color. The proposed building applies changes in material purposefully and in a manner corresponding to variations in building mass. Furthermore, the street-facing elevation employs a variety of building materials and articulation by way of recessed balconies, changes in building plane, and transparency.

Entrances

The primary pedestrian entrances are along Hollywood Boulevard and Berendo Street. Commercial guests will primarily access the site from Hollywood Boulevard, a Major Highway. As recommended in the Citywide Design Guidelines, the primary entrance to the mixed-use building is made distinct and visible by incorporating landscaped elements and windows leading to the lobby entrance. This will maintain an active street presence by incorporating usable street-facing entrances. The proposed project includes ground floor uses to maintain transparency and maximize a visual connection to the street by providing clear and unobstructed windows. Furthermore, the proposed project includes a pedestrian walkway from the Hollywood Boulevard frontage. The pedestrian walkway entrance is highlighted by additional transparency elements and signage.

Setbacks

The proposed project is within Subarea A (Neighborhood Conservation) and Subarea B (Mixed Use Boulevards) of the Vermont/Western SNAP Specific Plan area. Subarea A of the SNAP defers setback requirements to the underlying zone, or the RD1.5-1XL zone. For lots located within Subarea b, no front, side or rear yards are required for the development of any commercial or residential Project. In conjunction with Density Bonus, the Applicant has requested reduced setback requirements on the one (1) lot within Subarea A.

Parking

The Project will include 87 residential parking spaces and six (6) commercial parking spaces within one (1) at grade parking level and one (1) subterranean parking level to serve the proposed 86 dwelling units and commercial guests. The proposed project will also include 49 residential bicycle parking spaces and eight (8) commercial bicycle parking spaces. The Project proposes a new curb cut from Berendo Street which will lead vehicles into the parking areas. The pedestrian right-of-way will remain as existing and will maintain continuity for pedestrians.

Lighting

The Project proposes low-level exterior lighting to highlight and provide security for pedestrian paths and entrances. The lighting will ensure that all parking areas and pedestrian walkways are illuminated for adequate night visibility. As stated earlier, the Vermont/Western SNAP Specific Plan further requires parking areas to have a minimum of $\frac{3}{4}$ -foot-candle of flood lighting measured at the pavement. All on-site lighting shall be directed away from adjacent properties. The SNAP Development Standards further stipulate the requirements for shielding lighting, the height of light mounting, and lamp color. All of these requirements are imposed on the project as Conditions of Approval.

Landscaping

Various types of vegetation and trees are integrated into the design of the residential building facade to minimize the visual impact of the three-story building. As stated earlier, the Vermont/Western SNAP Specific Plan requires that all open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities be landscaped so that it is dust free and allows convenient outdoor activity. All landscaped areas shall be landscaped in accordance with a landscape plan prepared by a licensed landscape architect, licensed architect, or licensed landscape contractor. As seen on Exhibit "A", the subject site will be fully developed by buildings, driveways, and pedestrian pathways; however, the applicant proposes to provide landscaping through new street trees, planters along the building frontages and a vegetative roof top area. The proposed trees along the public right-of-way shall be approved by the Urban Forestry Division. All of these requirements are imposed on the project as Conditions of Approval.

Trash Collection

The trash and recycling area is located within the ground level of parking and is conditioned to not be visible from the public view.

17. The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

The proposed project includes the construction, use, and maintenance of a six (6)-story, 86-unit mixed use building, as permitted within Subarea A (Neighborhood Conservation) and Subarea B (Mixed Use Boulevards) of the Vermont/Western SNAP Specific Plan. The proposed project 10,086 square feet of open space area through a 2,546 square-foot common courtyard on the second floor, a 1,677 square-foot recreation room on the second floor, a 1,130 square-foot outdoor deck on the 6th floor and private balconies on the 2nd through 6th floors. The proposed unit mix requires 8,900 square feet of open space and a minimum of 4,450 square feet of open space to be located at grade level or first habitable room level. Therefore, the proposed open space includes appropriate amenities and

recreational facilities for the project's residents and are expected to minimize impacts on neighboring properties.

Environmental Findings

The Department of City Planning determined that the City of Los Angeles Guidelines for the implementation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject Project as Categorically Exempt under Section 15332 (Class 32, In-Fill Development Project), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

See Justification for Categorical Exemption Case No. ENV-2024-4115-CE in the case file for the narrative demonstrating that exceptions do not apply.

August 11, 2025

City Planning Commission
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012

Re: 4765 Hollywood Boulevard, 1710 Berendo Street
CPC-2024-4114-CU3-DB-SPPC-PR-VHCA
ENV-2024-4115-CE
Concerns Re Use of Categorical Exemption, Project Needs CEQA Review

Members of the City Planning Commission,

I'm writing to raise issues of concern related to the approval of the project cited above. Primarily, I'm concerned about the use of a categorical exemption as the environmental clearance. This project requires a higher level of environmental review for a number of reasons. The project's proximity to Barnsdall Park/Hollyhock House, and the fact that it is only one of several projects planned for area raise concerns about impacts to infrastructure and services. Among the areas of concern are:

- The project can't be adequately served by all required public utilities and services
- Cumulative impacts to infrastructure/services, including parks, schools, solid waste
- The project will impact Hollyhock House/Barnsdall Park, a UNESCO World Heritage Site

Detailed comments are below. **The use of a categorical exemption for this project is not allowed** because it can't be adequately served by required utilities and services. There will also be significant cumulative impacts from other projects in the area, and there are unique circumstances surrounding this location. The City must conduct a higher level of CEQA review.

Thank you for your time.

Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068

Detailed Comments

The Project Can't Be Adequately Served by All Required Public Utilities and Services

The project does not qualify for a Class 32 exemption. CEQA Sec. 15332 (e) requires that: "The site can be adequately served by all required utilities and public services." The LA Department of Sanitation is struggling unsuccessfully to serve existing residential customers, and the RecyclA program has failed to meet the State-mandated goal of recycling 50% of solid waste collected. The City of LA has no active landfills, and must rely on landfills in other jurisdictions to receive its solid waste. However, problems have arisen at these landfills that are becoming increasingly acute. An underground chemical reaction at El Sobrante Landfill is emitting toxic chemicals into the air.

Corona-area dump burdened with underground fire sought to accept debris from L.A. infernos
<https://www.latimes.com/environment/story/2025-02-28/southern-california-landfill-seeks-to-accept-fire-debris-amid>

Also, due to a similar underground chemical reaction at Chiquita Canyon, that landfill closed at the beginning of this year. A motion from Supervisor Kathryn Barger makes clear the serious challenges that our solid waste infrastructure is facing.

Motion from Supervisor Kathryn Barger
<https://file.lacounty.gov/SDSInter/bos/supdocs/199091.pdf>

With millions of residents generating substantial amounts of waste daily, the absence of this major landfill places immense pressure on alternative solutions such as recycling, composting, and waste-to-energy facilities. Neighboring facilities like the Sunshine Canyon Landfill, located 15 miles away, already operate near capacity, handling over 2.3 million tons in 2023.

Without adequate waste management infrastructure, illegal dumping and improper waste disposal may become more prevalent, leading to increased environmental contamination and health risks. Vulnerable populations, often residing in areas already burdened by environmental inequities, could bear the brunt of these challenges, exacerbating existing disparities.

Due to the strains on the area's solid waste infrastructure, illegal dumping has quickly risen, causing serious impacts to affected communities.

Motion from Councilmember Monica Rodriguez Re Illegal Dumping, CF 25-0203
https://cityclerk.lacity.org/online/docs/2025/25-0203_misc_2-26-25.pdf

Illegal dumping remains a persistent issue across the City of Los Angeles, affecting neighborhoods in every district. In the wake of the recent 2025 wildfires, my office has experienced a surge in complaints regarding illegal dumping throughout the district, further exacerbating existing concerns about public health, safety, and environmental degradation.

It's clear that the City of LA's solid waste disposal services and infrastructure are unable to cope with multiple serious challenges. The removal of debris in the wake of the recent fires has only exacerbated the situation. And yet the City continues to approve project after project, routinely skipping environmental review that could identify problems and mitigate impacts related to solid waste. Almost 600 new units have been recently approved within a half mile of this project (see below), and yet the City has made no effort to assess the additional burdens these projects will place on a solid waste disposal system that can't meet existing challenges. As Supervisor Barger and Councilmember Rodriguez point out, the failure to address these issues increases risks to public health and safety.

The project can **not** be adequately served by all required utilities and public services, and therefore does not qualify for a Class 32 exemption.

Cumulative Impacts to Infrastructure/Services, including Parks, Schools, Solid Waste Disposal

There are a number of other residential projects that have been recently approved within a half mile of the project under consideration.

1666 N. Vermont Ave., DIR-2019-6738-SPPA-SPP-TOC-SPR-HCA, 139 residential units
4850 Hollywood Blvd., DIR-2017-2825-SPP-SPR, 101 residential units, 10,000 sf commercial
4531 Hollywood Blvd., DIR-2014-2578-SPP-SPR, 202 residential units
4629 Maubert Ave., DIR-2019-3760-TOCSPP-SPR, 153 residential units

These projects will add almost 600 new units to the community, and yet the City repeatedly declines to assess the cumulative impacts they may cause. CEQA Guidelines 15300.2.(b) states that: "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant." According to the US Census, the average LA household consists of about 2.8 persons. The 595 new units approved within a half mile of the project site could bring 1,666 new residents to the area. This is likely to impact Barnsdall Park (right across the street from the current project), local schools, the local library (Los Feliz Branch), law enforcement and utilities. An exception applies under CEQA Guidelines 15300.2.(b), and the project does not qualify for a categorical exemption.

The Project Will Impact Hollyhock House/Barnsdall Park, a UNESCO World Heritage Site

Hollyhock House/Barnsdall Park has been designated as a UNESCO World Heritage Site. This is the only place in Los Angeles that has attained this level of international recognition. The Off-Menu Incentive to permit a 19-foot height increase to 69 feet risks impacting the view shed from Barnsdall Park. The CPC is considering a Class 32 exemption for infill development, but because of the project's proximity to a recognized World Heritage Site, an exception does apply under CEQA Guidelines Sec.15300.2. (c), which states: "A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." The City must conduct environmental review to assess impacts to this unique cultural resource.

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MARC D. JOSEPH

August 11, 2025

VIA Email and Overnight Mail

President Monique Lawshe
c/o Cecilia Lamas
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City Planning Commission
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Via Email Only

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Re: **ITEM 6: CREED LA Supplemental Comments on 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND)**

Dear President Lawshe, Commissioners, Ms. Lamas, and Ms. Martinez:

We write on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") regarding the 1420 Coil Avenue Freezer Expansion Project (Case No. CPC-2022-6589-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) ("Project") proposed by Konoike Pacific California, Inc. ("Applicant"), to be considered by the City of Los Angeles ("City") City Planning Commission ("CPC") on August 14, 2025.

CREED LA submits these supplemental comments to further demonstrate that the CPC Recommendation Report fails to show compliance with California Environmental Quality Act ("CEQA") and applicable local land use laws. As a result, the CPC lacks substantial evidence to support the findings required to approve the Project. CREED LA respectfully urges the CPC to continue the public hearing on the Project and remand this matter to Staff with direction to prepare an environmental impact report ("EIR") that fully discloses, analyzes, and mitigates, the Project's significant noise, hazards, and public health impacts, as required by CEQA, before considering the Project's proposed entitlements.

L7873-009acp

I. INTRODUCTION

On August 14, 2025, the CPC is scheduled to consider adoption of a Negative Declaration¹ and approval of the Project's entitlements, including a proposed general plan amendment and change of height district to accommodate a 65 foot building height, a zoning administrator determination to permit a transitional height of 65 feet for the portion of the remodeled building beyond 100 feet from the residential area to the west of the Project site, and a waiver of dedication and improvement requirements for Drum and Coil Avenues.² Any action to adopt the ND or approve the entitlements is premature and unsupported by substantial evidence in the record, as the City has failed to comply with the requirements of CEQA and the record lacks substantial evidence to support approval findings.

On June 12, 2025, CREED LA submitted comments on the Draft ND during the extended public comment period.³ These comments were supported by expert technical reports documenting potentially significant impacts to air quality, noise, and public health from the Project's construction and operational phases which the ND failed to disclose or mitigate.⁴ In response, the City's consultant prepared Responses to Comments ("RTCs"), which assert that the ND complies with CEQA and that no EIR is required.⁵

On August 4, 2025, CREED LA submitted comments to the CPC demonstrating that the RTCs fail to cure the ND's fundamental analytical deficiencies.⁶ These supplemental comments expand upon those concerns and are supported by CREED LA's air quality and public health expert, Dr. James J. Clark,

¹ City of Los Angeles, Initial Study: KPAC Coil Avenue Freezer Expansion Project (Apr. 2025) (hereinafter "ND").

² City of Los Angeles, Department of City Planning, Recommendation Report re: 1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street (Aug. 14, 2025) (hereinafter "Recommendation Report"), available at https://planning.lacity.gov/plndoc/Staff_Reports/2025/08-14-2025/CPC_2022_6859.pdf.

³ Letter to Norali Martinez City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: Comments on Negative Declaration for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) (June 12, 2025) (hereinafter "CREED LA ND Comments").

⁴ *Id.*, attach. A-B.

⁵ Letter to Norali Martinez, City of Los Angeles from Christian Kirkian, Meridian Consultants re: Response to Comments on the Negative Declaration (ND) for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) from Adams Broadwell Joseph & Cardozo letter dated June 12, 2025 (June 23, 2025) (hereinafter "RTCs").

⁶ Letter to Monique Lawshe, City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: City Planning Commission 8/14/25 Hearing for 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) (Aug. 4, 2025) (hereinafter "CREED LA CPC Comments").

Ph.D.⁷ The record contains substantial evidence from qualified experts supporting a fair argument that the Project may result in significant, unmitigated environmental impacts, including but not limited to noise, air quality, and public health effects. Under CEQA, the existence of such evidence triggers the City's obligation to prepare an EIR.⁸

The record also demonstrates that the City cannot make the necessary land use findings due to significant, unmitigated public health and environmental impacts. Accordingly, CREED LA respectfully urges the CPC to continue the public hearing, and direct Staff to prepare a legally adequate EIR.

II. THE CITY HAS NOT COMPLIED WITH CEQA

A. The RTCs Improperly Ignore Expert Evidence Demonstrating a Potentially Significant Cumulative Impact

Under CEQA, a lead agency must determine that a project may have a significant environmental impact if its effects, while individually limited, are cumulatively considerable.⁹ A “cumulatively considerable” impact occurs when the project incremental effects are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.¹⁰ The City has not adequately considered how the Project's diesel particulate matter (“DPM”) emissions, when combined with the severe air pollution resulting from past and ongoing sources in the area, may contribute to a significant cumulative impact on public health. Dr. Clark's health risk assessment prepared for this Project demonstrates that the Project's cancer risks could be significant when properly evaluated in the context of these existing environmental burdens.

Dr. Clark highlights that the draft cumulative impact guidance currently in development by the South Coast Air Quality Management District (“SCAQMD”) is grounded in an “empirically validated and regionally specific assessment of background air toxics” through its reliance on SCAQMD's Multiple Air Toxics Exposure Study (“MATES”) V. In fact, in that study, SCAQMD concludes that the largest contributor to cancer risk from air pollution is DPM emissions, contributing

⁷ **Exhibit A**, Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from James J. Clark, Clark & Associates re: Response to Comments from Meridian Consultants Regarding Draft Initial Study/Negative Declaration for KPAC Coil Avenue Freezer Expansion Project, Wilmington, CA (Case Number: ENV-2022-6860-ND) (Aug. 8, 2025) (hereinafter “Clark Supplemental Comments”).

⁸ *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.

⁹ Pub. Res. Code § 21083(b); 14 Cal. Code Regs. (“CEQA Guidelines”) §§ 15064(h)(1); 15065(a)(3).

¹⁰ Pub. Res. Code § 21083(b)(2); CEQA Guidelines §§ 15064(h)(1); 15065(a)(3).

approximately 50% of the cancer risk.¹¹ The MATES V data shows that “the zip code where the proposed Project is located already experiences an air toxic cancer risk of 664 in 1 million, a level 98% higher than the average for all other zip codes in the South Coast Air Basin. Notably, over 66% of that risk is attributable to DPM.”¹² SCAQMD’s findings constitute substantial evidence demonstrating that community exposure to DPM emissions in the Project vicinity is significant.

Dr. Clark’s modeling demonstrates that Project would increase the cumulative cancer risk for nearby residential receptors by an additional 2.27 in 1 million, further exacerbating these impacts.¹³ He concludes: “While 2.27 in 1 million may appear numerically small in isolation, it must be evaluated in the broader context of the existing (and future) pollution. In this context, the additional 2.27 in 1 million cannot be dismissed as negligible. Rather, it represents a statistically and ethically meaningful compounding of harm in a community that is already demonstrably overburdened by toxic emissions.”¹⁴ Dr. Clark’s findings provide substantial evidence supporting a fair argument that the Project’s cumulative health risk impacts are significant and unmitigated.

Moreover, SCAQMD has recommended that mobile source health risk assessments be performed if a warehouse project “generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used.”¹⁵ SCAQMD has also expressed concern about adverse health impacts from warehouse expansion projects in close proximity to sensitive land uses, especially in communities located in or adjacent to multiple other existing warehouses and their associated truck activities, like the project site.¹⁶ The City’s assertion that cumulative health risk is insignificant is wrong.

¹¹ South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast AQMD: Final Report (Aug. 2021) pp. ES-6, 2-63.

¹² Clark Supplemental Comments at p. 2.

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ See e.g., Letter to Matthew Evans, City of Perris from Sam Wang, South Coast Air Quality Management District re: Notice of Preparation of a Draft Environmental Impact Report for First Industrial Logistics at Harley Knox and Indian Project (Proposed Project) (SCH No: 2025051368) (June 18, 2025) p. 2 (hereinafter “SCQAMD First Industrial Logistics NOP Comments”); see South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (Aug. 2003), available at https://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=a86e1d61_2.

¹⁶ SCQAMD First Industrial Logistics NOP Comments at p. 3.

B. The RTCs Fail to Adequately Address Operational Air Quality and Public Health Impacts

CREED LA commented that the ND underestimated operational emissions because it excluded key sources, including transportation refrigeration units (“TRUs”).¹⁷ In response, the RTCs acknowledge that TRU activity would increase by up to 40 trucks per day, but they assert – without evidentiary support – that this increase is not expected to materially affect localized DPM emissions.¹⁸ This claim is unsubstantiated as neither the RTCs nor the ND provides any meaningful analysis of TRU emissions. The RTCs attempt to account for TRU-related emissions by increasing the passenger car input in the CalEEMod file as a proxy is inadequate and misleading.¹⁹ CalEEMod does not quantify cancer risk or account for the unique emissions profile of TRUs.²⁰ Moreover, the RTCs’ reliance on the California Air Resources Board’s TRU Airborne Toxic Control Measures is misplaced.²¹ While TRUs are subject to regulatory requirements intended to reduce DPM emissions, these measures do not eliminate emissions or associated health risks.²² TRUs continues to pose a significant health risk, particularly in communities already burdened by air pollution.²³

Dr. Clark’s comments reflect similar concerns previously raised by SCAQMD regarding another warehouse project involving the potential use of TRUs. In that case, SCAQMD noted that the CEQA document failed to quantify the number of TRUs expected to serve the site and did not estimate air pollutant emissions associated with their operation, citing that CalEEMod does not currently account for TRU emissions.²⁴ SCAQMD emphasized the need to calculate the potential cancer or health risk impacts associated with these TRUs.²⁵

CREED LA also noted that the ND failed to account for emissions associated with cargo handling equipment and fire pumps.²⁶ In response, the RTCs updated

¹⁷ CREED LA ND Comments at pp. 9-11.

¹⁸ RTCs at pp. 6-8.

¹⁹ *Id.* at pp. 6-7.

²⁰ Letter to Nathan Perez, City of Perez from Sam Wang, South Coast Air Quality Management District re: Draft Environmental Impact Report (Draft EIR) for the Perris Airport Logistics Center Project (Proposed Project) (SCH No: 2023100540) (July 25, 2025) p. 5 (hereinafter “SCAQMD Perris Logistics Center DEIR Comments”), available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/july-2025/rvc250617-06.pdf?sfvrsn=c7cb6e7e_3.

²¹ Clark Supplemental Comments at p. 4.

²² *Ibid.*

²³ SCAQMD Perris Logistics Center DEIR Comments at p. 5.

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ CREED LA ND Comments at pp. 9-11.

the CalEEMod model to include emissions from these sources.²⁷ However, while this revision addresses emissions estimates in a general sense, the RTCs still fail to evaluate the cancer risks associated with DPM emissions from these sources.²⁸ Without a health risk analysis, the ND remains incomplete and does not satisfy CEQA's requirement to disclose and evaluate potential significant health impacts.

III. THE CITY CANNOT MAKE THE NECESSARY LAND USE FINDINGS DUE TO SIGNIFICANT, UNMITIGATED PUBLIC HEALTH AND ENVIRONMENTAL IMPACTS

CREED LA commented that the City cannot lawfully make the required findings to approve these entitlements because the Project would result in significant, unmitigated public health and environmental impacts.²⁹ In response, the RTCs assert that the environmental analysis is adequate and, therefore, the land use findings are adequately supported.³⁰ As discussed in CREED LA's earlier submission to the CPC and in Section II of this letter, the RTCs fail to cure the ND's deficiencies, and substantial evidence in the form of expert opinions based on project-specific data demonstrates potential health and safety risks which are not mitigated. The Project's adverse effects on public health, air quality, noise, and other environmental factors would directly conflict with key policies aimed at protecting public health and welfare. As such, granting the requested approvals would be inconsistent with the General Plan and applicable community plan.

IV. CONCLUSION

CREED LA respectfully urges the CPC to continue the public hearing and direct Staff to prepare an EIR that fully discloses, analyzes, and mitigates the Project's noise, air quality, and public health impacts, as required by CEQA.

Sincerely,



Andrew J. Graf

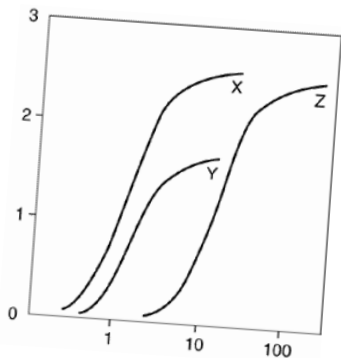
AJG:acp

²⁷ RTCs at pp. 7-8.

²⁸ Clark Supplemental Comments at p. 4.

²⁹ CREED LA ND Comments at pp. 18-19.

³⁰ RTCs at pp. 12-13.



Clark & Associates

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August 8, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Andrew Graf

**Subject: Response To Comments From Meridian Consultants
Regarding Draft Initial Study/Negative Declaration For
KPAC Coil Avenue Freezer Expansion Project,
Wilmington, CA (Case Number: ENV-2022-6860-ND)**

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) reviewed materials related to the responses prepared by Meridian Consultants (Meridian) dated June 23, 2025, regarding critiques offered on the Initial Study/Negative Declaration (ND) for the above-referenced Project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

1. Response To Response 5/7: The Need For A Construction Health Risk Assessment And The Cumulative Risk Threshold

The assertions in Response 5 are inconsistent with the new regulatory guidance and risk assessment methodologies from the South Coast Air Quality Management District's (SCAQMD's) updated draft CEQA cumulative impact guidance, and misinterpret the toxicology of exposure to carcinogens. First, Response 5 states that the City relies on SCAQMD's CEQA Air Quality Handbook published in 1993 for the preparation of CEQA air quality analyses. Reliance on this 32-year-old document is misplaced given that SCAQMD initiated a public process in 2022 to update existing cumulative analysis guidance (which was originally developed in 2003, not 1993).

The updates include the Working Group's (WG) Conceptual/Potential Cumulative Health Risk Assessment protocols detailed in my previous letter. The draft protocol establishes significance thresholds based on MATES cancer risk percentiles. The MATES V (Multiple Air Toxics Exposure Study V), conducted by SCAQMD, includes a fixed site monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize cancer risk across the basin. The purpose of the study is to characterize air toxic levels in highly impacted areas and better understand emissions from warehouses and other industrial uses. In other words, the MATES V study provides empirically validated and regionally specific assessment of background air toxics, particularly in overburdened communities, and must be considered when evaluating whether the incremental effects of the proposed warehouse expansion are cumulatively considerable.

As documented in the MATES V study, the zip code where the proposed project is located already experiences an air toxic cancer risk that of **664 in 1 million**, a level **98% higher than the average for all other zip codes in the South Coast Air Basin**. Notably, **over 66% of that risk is attributable to DPM**, a known toxic air contaminant associated with construction equipment, warehouse-related goods movement, and heavy-duty truck emissions. This underscores the community's existing disproportionate pollution burden and highlights the need for heightened scrutiny of a project that could further exacerbate these health risks.

Based on the emissions data in the ND and regulatory-approved health risk assessment methodologies, the project-specific air quality modeling outlined in my prior comment letter demonstrates that the proposed warehouse expansion would increase the cumulative cancer risk for nearby residential receptors by an additional 2.27 in 1 million. While 2.27 in 1 million may appear numerically small in isolation, it must be evaluated in the broader context of the existing (and future) pollution. In this context, the additional 2.27 in 1 million cannot be dismissed as negligible. Rather, it represents a statistically and ethically meaningful compounding of harm in a community that is already demonstrably overburdened by toxic emissions.

Second, the claim that an evaluation of construction TAC emissions is not warranted because the exposure period is only 15 months is flat out wrong. Diesel exhaust, particularly DPM, is classified by the State of California as a TAC. Diesel exhaust is linked to serious health problems including

increased respiratory disease, lung damage, cancer, and premature death.^{1,2,3,4} TACs, including DPM⁵, contribute to a host of respiratory impacts and may lead to the development of various cancers.

DPM is recognized by state and federal agencies as causing severe health risk because it contains toxic materials, unlike PM_{2.5} and PM₁₀.⁶ Exposure to DPM increases the risk of lung cancer and causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction.⁷ Failing to quantify carcinogenic and other health risk impacts place the community at risk for unwanted adverse health impacts. *Even brief exposures to the TACs could lead to the development of adverse health impacts over the life of an individual.*

TACs are not adequately captured by localized significance thresholds because LSTs were developed by SCAQMD to specifically assess localized impacts from criteria pollutants, not TACs. Instead, health risks from TACs are typically assessed through modeled exposure using the Office of Environmental Health Hazard Assessment (OEHHA) guidance. OEHHA recommends that cancer risks for projects lasting longer than 2 months, including construction activities, be evaluated in accordance with its risk assessment guidelines.⁸ As discussed above, the modeling shows an incremental cancer risk increase of 2.21 in 1 million, which is significant given the severity of existing air pollution.

¹ California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Diesel%20Particulate%20Matter%20and%20Health&text=In%201998%2C%20CARB%20identified%20DPM,and%20other%20adverse%20health%20effects.>

² U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

³ Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

⁴ California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

⁵ Because DPM is a TAC, it is a different air pollutant than criteria particulate matter emissions such as PM₁₀, PM_{2.5}, and fugitive dust. DPM exposure causes acute health effects that are different from the effects of exposure to PM alone.

⁶ Health & Safety Code § 39655(a) (defining “toxic air contaminant” as air pollutants “which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.”)

⁷ Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel’s April 22, 1998 Meeting.

⁸ Office of Environmental Health Hazard Assessment, Guidance Manual for Preparation of Health Risk Assessments. Feb. 2015. p. 8-17 to 8-18.

2. Response To Response 8: The Air Quality Analysis Fails To Analyze Emissions from Transportation Refrigeration Units, Cargo Handling Onsite, And Fire Pumps

Meridian's responses regarding the impacts of Transport Refrigeration Units (TRUs), cargo handling equipment onsite, and fire pumps are non-responsive.

With respect to TRUs, Meridian acknowledges that the total number of trucks using the project site will incrementally increase up to 33%.⁹ This necessarily implies a corresponding increase in DPM emissions from project operations – also up to 33%. However, the response dismisses the potential impact of these increased emissions by asserting that they are not expected to materially increase localized DPM emissions, despite the absence of any quantitative analysis to support this conclusion. Notably, the response (and the ND) fails to evaluate whether operational DPM emissions fall below SCAQMD (or any other) significance thresholds.

As discussed above, the background cancer risk in the project area is already 664 in one million. More than 66% of the risk is attributable to DPM exposure, which is directly linked to heavy-duty diesel truck activity, including TRUs. In this context, any additional increase in DPM emissions from the proposed project must be considered cumulatively significant, particularly in the absence of a health risk assessment or dispersion modeling that demonstrates otherwise.

With regards to emissions from cargo handling equipment and fire pumps, the response provides updated CalEEMod modeling data which includes these components. While the updated analysis quantifies criteria pollutant emissions, it does not analyze the incremental cancer risks due to additional DPM emissions associated with these sources. Therefore, the analysis remains deficient.

Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. A draft environmental impact report should be prepared to address these substantial concerns.

Sincerely,



⁹ TRU activity would increase by 30 to 40 trucks per day from the current 110 to 120. (40/120 = 33.33%).



Wilmington Neighborhood Council

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Gina Martinez, Chair

Gayle Fleury, Co-Chair

Fabiola Garcia, Secretary

Alicia Baltazar, Treasurer

Marisol Ontiveros, Parliamentarian

May 27, 2025

CPC-2022-6859-GPA-HDZAD-SPR-WDI; ENV2022-6860-ND

1420 Coil Avenue

The Wilmington Neighborhood Council congratulates KPAC on their success and desire to expand their operations within the community of Wilmington. I am sure that KPAC has learned what we the community have known all along that Wilmington holds great value for business. However, it is also quite concerning that it appears that KPAC does not reciprocate and value the community of Wilmington and may be taking advantage of our community.

To our knowledge, KPAC does little to nothing for the community. We have noticed that the streets surrounding their facility are completely wrecked and eroded and very little is done to clean up in the area. They do not partner for improvements in the area, yet they reap the rewards in making profits. These profits do not get invested back into our community and in short leaves our community worse off than it was before they started conducting business in Wilmington. It does not seem prudent to reward a company with waivers and exemptions when they completely exempt the community without a thought. For too long too many businesses in Wilmington have leached off and drained the resources in our community for their own sustenance, benefit and profits.

We further have concerns about the truck traffic that will inevitably increase if these changes are implemented. Idling, pollution, and additional trucks on an already overburdened street are of great concern.

There are many things that KPAC could do to invest in our community and show that they are a true community partner as well as to mitigate any possible negative effects that may take place.

KPAC could do some or all of the following:

- Repave and use reinforced asphalt on the streets directly surrounding their facility. Currently the streets are completely cracked and crumbling.
- Improve lighting conditions in the area surrounding the facility. Lighting helps reduce crime and the area and presently the area is very dark during the evenings.
- Provide and implement a plan that would address any idling trucks or truck traffic that is bound to increase as well as insuring that no trucks would reduce the current level of service on our streets.
- Install purple air sensors to track pollution in the area and have the data put on the purple air website for public access (there is no cost to have monitoring put on purple airs website)
- Provide free Wi-Fi for the community residing in the immediate area
- Hire private security for a 5-block radius to help with the reporting and prevention of crime.
- Weekly clean ups and power washing of streets, alleys and railroad spurs for a 5 block radius.
- Regular tree trimming in the 5 block radius of the facility.
- Provide a Youth Employment program for Students during the summer
- Ensure that residents of Wilmington account for a minimum of 20% of their workforce at all times.

These are just a few ideas that could benefit not just our community but KPAC as well. The residents of Wilmington are hard-working and dedicated individuals. They deserve to be able to work in the community where they live instead of driving by it like they have been for the past 2 decades. There are many studies that suggest that living in close proximity to

home improves productivity, attendance, community pride, shift flexibility and improvement of overall work balance.

At this time, we cannot support this project. Currently, this project holds no benefit whatsoever to our community and unless and until it does, we would be remiss in our duties to support such a project.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "G Martinez". The signature is written in a cursive, flowing style.

G Martinez

Chair, Wilmington Neighborhood Council

On Behalf of the Wilmington Neighborhood Council

DAY OF HEARING SUBMISSIONS

Date: August 14, 2025

Subject: Opposition to #5a. CPC-2024-2450-DB-CDP-SPPC-CUB-VHCA-MEL

On June 28, 2019, the Department of City Planning approved Vesting Tentative Tract No. 77196-CN “composed of the merger and subdivision” of four existing lots at 825 Hampton Drive, Venice. On June 28, 2019, DCP approved the entitlements in DIR-2017-3765-CDP-SPP-MEL, ZA-2017-4360-CUB, and ENV-2017-3767-CE at 825 Hampton:

“Approve a Coastal Development Permit authorizing the demolition of five, one-story, commercial buildings and the construction, use and maintenance of a three-story, 23,950 square-foot, mixed-use development comprised of eight Artist-in-Residence dwelling units (eight residential condominium units) and 8,508 square-feet of groundfloor commercial uses (eight commercial condominium units) consisting of 2,365 square feet of retail use, 2,590 square feet of fitness use, and a 3,553 square-foot restaurant use having 1,210 square feet of interior Service Floor area and 90 square feet of exterior Service Floor area with 56 indoor seats and 4 outdoor seats. The structure provides 86 parking spaces within three levels of subterranean parking.”

On May 25, 2022, DCP approved a six-year extension until June 18, 2028, for VTT-77196-EXT per Subdivision Map Act section 66452.6(e). DCP concurrently extended the entitlements in DIR-2017-3765-CDP-SPP-MEL and ZA-2017-4360-CUB until June 18, 2028, per LAMC 12.36 (Multiple Approvals Ordinance). There are many problems with the processing of those entitlements but as approved, those approvals are still active. Public Records Act (PRA) records show a 2022 email exchange (5/17/2022 to 6/24/2022) between DCP senior planner Juliet Oh and lobbyist-representative Elisa Paster regarding the Coastal Act prohibition on two concurrent CDP applications for the same property. Ms. Oh clarified:

1. Per the Coastal Act, the CCC requires an Applicant to terminate a valid unused CDP before a new CDP application is accepted.
2. “If a new project and new entitlements are filed, the new project would be subject to brand new CEQA review. So each project stands alone.”

Also, CPC-2024-2450-DB-CDP-SPPC-CUB-VHCA-MEL required a new tract map per the Subdivision Map Act (Morehart v. County of Santa Barbara (1994) below).

As such, CPC-2024-2450-DB-CDP-SPPC-CUB-VHCA-MEL cannot be approved.

Appreciatively,

Margaret Molloy

- 1. Per the California Coastal Commission an unused active CDP must be terminated before a new project application can be submitted.**

Date : 6/23/2022 8:10:13 AM
From : "Juliet Oh"
To : "Elisa Paster"
Subject : Re: 825 Hampton
Attachment : image.png;

Hi Elisa,

Yes, CCC staff advised there should not be two active CDPs for a site, that the existing (unused) CDP should be terminated before a new one is accepted. Here is the Section they referenced:

§ 13053.4. Single Permit Application.

(a) To the maximum extent feasible, functionally related developments to be performed by the same applicant shall be the subject of a single permit application. The executive director shall not accept for filing a second application for development which is the subject of a permit application already pending before the commission. This section shall not limit the right of an applicant to amend a pending application for a permit in accordance with the provisions of Section [13072](#).

(b) The executive director shall not accept for filing an application for development on a lot or parcel or portion thereof which is the subject of a pending proposal for an adjustment to the boundary of the coastal zone pursuant to [Public Resources Code section 30103\(b\)](#).



Date : 6/24/2022 11:56:44 AM
From : "Juliet Oh"
To : "Elisa Paster"
Subject : Re: 825 Hampton
Attachment : image001.png;image002.jpg;

That sentence was to confirm that CCC stated their position is that a new CDP application should not be accepted until the active (unused) CDP is withdrawn.

Ms. Oh's 6/24/2022 email included "Cal. Code Regs. Tit. 14, § 13072 - Procedures for Amended Application" and "California Code, Public Resources Code - PRC § 30103.5."

2. A NEW TRACT MAP IS REQUIRED FOR CPC-2024-2450-DB-CDP-SPPC-CUB-VHCA-MEL

Morehart v. County of Santa Barbara (1994) 7 Cal.4th 725 , 29 Cal.Rptr.2d 804; 872 P.2d 143

The Subdivision Map Act (Gov. Code, § 66410 et seq.) provides that contiguous parcels of land are not automatically merged by virtue of being held by the same owner. Such parcels "may be merged by local agencies only in accordance with the authority and procedures prescribed by this article" (id., §§ 66451.10-66451.21], which "provide[s] the sole and exclusive authority for local agency initiated merger of contiguous parcels." (Id., § 66451.10, subd. (b); all section references are to the Government Code unless otherwise indicated.)



Council District 4 Comment on Item 5b for tomorrow

Armida Reyes <armida.reyes@lacity.org>

Wed, Aug 13, 2025 at 5:18 PM

To: Planning CPC <cpc@lacity.org>, Mashael Majid <mashael.majid@lacity.org>

Cc: David Goldberg <david@agd-landuse.com>, Matt Dzurec <matt@agd-landuse.com>

Hi All-

Just a small change in bold on our comment:

Dear Honorable City Planning Commissioners,

Hope all is well. My name is Armida Reyes, Housing and Planning Deputy for Councilmember Nithya Raman of the Fourth District, where this proposed project is located for CPC-2024-4114-CU3-DB-SPPC-PR-VHCA. Our office is excited to see this site be activated with residential use. This vacant site has been subject to nuisance activities in the past.

We are pleased that there is a well-designed mixed-use project that will offer 86 units of housing and almost **2,600 square feet** of retail space along a major commercial corridor near cultural resources and amenities, most notably Barnsdall Art Park, in a high resource neighborhood being planned here.

Additionally, the proposed project is not located within the protected viewshed for Hollyhock House. As such, we support its request for entitlements and respectfully recommend that it move forward. Thanks in advance.

Best,

--

Armida Reyes (she/her)
Housing and Planning Deputy
Work Phone: 213-500-6903
District Line: 213-473-7004



**NITHYA
RAMAN**

Los Angeles
City Councilmember
4th District

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FRANK LLOYD WRIGHT BUILDING CONSERVANCY

August 13, 2025

City Planning Commission
City of Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

Subject: Concern Regarding Proposed Development Across from Barnsdall Art Park – Request for Height Adjustment and Inclusion in Future Reviews (CPC-2024-4114-DB-CU3-CUB-SPPC-PR-VHCA; ENV-2024-4115-EAF)

Dear Members of the City Planning Commission,

On behalf of the Frank Lloyd Wright Building Conservancy, I write with concerns regarding the proposed development located directly across Hollywood Boulevard from Barnsdall Art Park at 4773 West Hollywood Blvd.

Hollyhock House is one of eight sites across the country that comprise “The 20th Century Architecture of Frank Lloyd Wright”, which was inscribed onto the World Heritage List in July 2019. The Frank Lloyd Wright Building Conservancy organized the nomination and is responsible to the National Park Service/Department of the Interior for working with the individual sites to promote and protect them.

Nominating a property for World Heritage listing is an arduous process, requiring many years of preparing our case that would ensure the World Heritage Committee that if the property were inscribed, it would be sufficiently protected. Hollyhock House made this esteemed list of Wright buildings out of nearly 400 extant buildings not only for its global design influence, architectural integrity and authenticity, but because of the protections that the City of Los Angeles has provided to ensure it remains a world-class destination.

We understand that the proposed building—planned at a height of 69 feet—was permitted prior to the adoption of updated zoning regulations that now establish a 50-foot height limit along the Hollywood Boulevard corridor. Additionally, we understand that the project was able to exceed this height limit through the use of density bonus incentives. While we recognize the importance of creating more housing in Los Angeles, we respectfully urge the City to reconsider the use of such bonuses in cases where they negatively affect designated cultural resources.

Reducing the height of this development to 50 feet, in line with current zoning standards, would help mitigate its visual impact on Barnsdall Art Park and its centerpiece, Hollyhock House. More broadly, we encourage the City to limit the applicability of density bonus incentives in contexts where increased height may compromise historic view sheds or otherwise diminish the integrity of our culturally significant site.

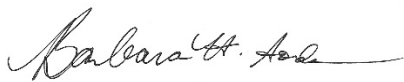
With its inscription on the World Heritage List, Hollyhock House was recognized for its Outstanding Universal Value (OUV). A key element of this designation is the integrity of the site's setting, including its panoramic views over Los Angeles. These views are not incidental; they are intrinsic to Wright's architectural vision and critical to the site's cultural and historic significance. UNESCO specifically identifies the protection of such visual relationships as essential to preserving the authenticity and integrity of the property.

Given the proximity of the proposed development and its potential to encroach upon these historically significant view sheds, we ask that the City take these considerations into account. Reducing the building's height to 50 feet would be a meaningful step toward preserving the qualities that make Hollyhock House a site of global importance.

We respectfully request that Hollyhock House staff be included in the review process for any future developments in the surrounding area that could affect the site's visual setting. Their involvement is a vital component of responsible planning near Hollyhock House, enabling early identification of potential impacts and helping to safeguard the site's heritage values in alignment with local planning objectives and international preservation commitments.

Thank you for your attention to this important matter. We appreciate the City's efforts to manage responsible growth while safeguarding the cultural and historic resources that define Los Angeles. We look forward to continued dialogue and collaboration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Gordon".

Barbara Gordon
Executive Director
Frank Lloyd Wright Building Conservancy

cc:

Vince Bertoni, Director of Planning, Department of City Planning
Ken Bernstein, Principal City Planner, Office of Historic Resources
Lambert Giessinger, Historic Preservation Architect, Office of Historic Resources
Danalynn Dominguez, City Planner | Central Project Planning, Los Angeles City Planning
Daniel Tarica, General Manager, Department of Cultural Affairs
Christopher Concepcion, Assistant General Manager, Department of Cultural Affairs
Lisa Davis, Community Arts Director, Department of Cultural Affairs
Carla Fantozzi, Barnsdall Park Director, Department of Cultural Affairs
Abbey Chamberlain Brach, Hollyhock House Director and Curator, Department of Cultural Affairs