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October 18, 2011

RE: University of Southern California (USC) Nexus Study Response to Comments;
(PLUM Planning and Land Use Management) presentation: November 1, 2011 (tentative)

Council File: 08-2620

Other Related References:

City Planning Case Number: CPC-2011-927-GPA-ZC-HD-SP-CUB, CPC-2011-1171-DA
Environmental Case Number: ENV-2009-271-EIR, State Clearinghouse Number: 2009011101

Dear Community Stakeholders,

The Department of City Planning has been actively moving forward on a Specific Plan (Proposed Project) for USC, which provides for development in the University Park Campus area. Proposed development would provide new academic and University-serving uses, retail/commercial uses, residential development; and a hotel and conference center. In response to the Proposed Project, Los Angeles City Council Motion (Council File: 08-2620) was adopted on December 3, 2008.

The purpose of the Nexus Study is to assess additional impacts of the Proposed Project that were beyond the scope of the Environmental Impact Report (EIR). The key categories of impacts the Study performed analysis on included employment, infrastructure, facilities, services, housing, open space, parking, and infrastructure needs.

This nexus study was circulated to the general public on July 14, 2011 via the Department of City Planning website. On August 2, 2011 the Department presented findings the completed nexus study to the Planning and Land Use Management Committee of the City Council. During the presentation, time was allotted for comments on the study from individuals in attendance. During nearly two hours of testimony, many concerns on the Nexus Study were submitted to the PLUM committee. In response, the PLUM committee requested the Department of City Planning to respond to these concerns and report back within 90 days of the original presentation date.

During the past several weeks, Planning Department staff have analyzed and transcribed the audio recording of the original PLUM presentation to fully capture the concerns of the public. The following attachment stays true to this format, as each key issue is addressed one at a time to stay organized and efficient. These responses are for public circulation and review, prior to our return to PLUM, tentatively scheduled for November 1, 2011.

The conclusion of the analysis of the nexus study does not mean the end of the Specific Plan adoption process, or the end of opportunities for civic engagement. There are still numerous steps and opportunities for public comments that must take place before the Specific Plan is adopted.

USC Nexus Study-Response to PLUM comments

USC is intending to seek approvals on three separate core campus projects that were studied in the EIR:

- September 2011: USC gained approval of one Core Campus project (DIR-2011-1105-SPR)
- October 2011: USC has filed for approval for a second Core Campus project (DIR-2011-1918-SPR). The third and final Core Campus project has not been filed with City Planning yet.

Following this, the Specific Plan will move forward with its review process:

- Fall 2011/Winter 2012: Community Workshops and Open Houses
- Date to be determined: Release of a draft Specific Plan and Development Agreement for community review
- Date to be determined: Formal Public Hearing
- Dates to be determined: City Planning Commission, PLUM, and City Council

You may contact Jason Chan at 213-978-1178 for more information on the nexus study, Specific Plan, or Development Agreement.

Sincerely,



Faisal Roble
Senior City Planner

Attachment

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

1. ISSUE: Impacts on existing local small businesses from introduction of new retail

Comments were made regarding the economic impacts on small businesses due to the competition that could result from the introduction of the project's new retail and commercial space. This expressed concern is valid. In fact, within the context of environmental analysis (CEQA), this concept is studied as "Urban Decay." "Urban Decay" refers to the following: If new development retail businesses could likely attract sales away from existing businesses, it must be determined whether the severity of this change could cause disinvestment such that significant business closures, abandonment or other forms of physical deterioration or "decay" will result, thereby resulting in an adverse impact on the physical environment.

Prior to preparation of the Environmental Impact Report (EIR), a study was prepared by a consultant (HR&A) to address the potential for "Urban Decay" as a result of the commercial component of the proposed project. This study, entitled, *Analysis of the Potential for Urban Decay as a Consequence of the Development of Subarea 3 Retail/Commercial Component University of Southern California City of Los Angeles*, (the "Study") was included as a technical appendix to the Draft EIR. The boundaries of the Urban Decay study area encompass the boundaries of the Nexus Study area, thus the impacts on existing local businesses in the Nexus Study area were analyzed.

The Study evaluated whether the proposed project's commercial space would result in a significant adverse economic impact on existing developments of a similar type in the relevant market areas surrounding the project. The Study analyzed these impacts by estimating the growth in demand for certain types of retail goods in the study area over the time period from 2009 to 2015. Demand is measured by the anticipated growth in population and personal income, visitation patterns, student enrollment, employment growth and other factors. The amount of commercial square feet that can be supported by this demand is then calculated and compared with the commercial square feet that will be provided by the project. If the project amount exceeds projected demand, sales could be attracted away from existing places of business. If, on the other hand, the amount of commercial space planned for the project, is equal to or less than the estimated space that can be supported by future demand, it can be concluded reasonably that existing businesses will be able to maintain a market share.

The comparison was made between establishments offering similar merchandise to that proposed by the project, so that potential competition was considered in the analysis. That is, only businesses offering similar merchandise to that of the proposed retail project were considered. For example, two retail centers in Koreatown are focused primarily on service to their immediate ethnic communities, and thus do not offer products and services that will compete with those that will be provided in the project.

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

The demand was projected for two retail categories: shopper goods¹ and convenience goods.² Both the Shopper Goods Market Area (SGMA) within a 5.0 mile radius of the project, and the Convenience Goods Market Area (CGMA) within a 1.5-mile radius were analyzed. The conclusion was that growth in customer demand will be large enough to support both the proposed project's commercial space, and other existing businesses offering comparable products. The estimated growth in demand for shopper goods can sustain an additional 1,083,171 square feet of retail space. The proposed project will provide 115,500 square feet of selected shopper goods. The analysis also showed that growth for demand in the convenience goods market area is also sufficient to support the additional square feet of the project supermarket and drugstore.

Additionally, there may be potential beneficial impacts from the project on existing small businesses in the area surrounding the University Park Campus. These include:

- The campus population and staff generated by the project provide a larger base of potential customers to purchase goods and services offered by local small businesses.
- Construction of the project's improvements provides opportunities for local construction contractors, materials suppliers, professional services and other service providers to compete for new business required to meet new construction-related demand.
- The creation of a newer substantial cluster of retail will encourage people to shop in their community, and this is expected to spill over to other local businesses along the corridors as the presence of shoppers in the area increases.

¹ Shopper Goods encompass four types of retail goods: 1) apparel and accessories stores; 2) general merchandise stores (most commonly department stores); 3) furniture, home furnishings, appliance and related stores; and 4) specialty retail stores, encompassing a diverse array of retail shops selling such items as gifts, art goods, sporting goods, florists, photographic equipment, musical instruments, stationery, books, jewelry, and office and school supplies.

² Convenience goods include food, beverages, drugs and sundries, which are typically purchased from stores conveniently located adjacent to residential developments or the work place.

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

2. ISSUE: USC support for existing local small businesses

USC offers several programs to assist small businesses in the area. These programs include:

- The USC Gould School of Law's Small Business Clinic, the USC Marshall School of Business's Marshall Consulting Program and other initiatives sponsored by the University, offer expertise and services designed to help local businesses grow and succeed.
- A non-profit grant-making organization called USC Neighborhood Outreach solicits grant proposals and awards grants based on community impact, cost-effectiveness, volunteer involvement and relevance to the University's community objectives.
- Existing businesses will have the opportunity to relocate to new space in the project's retail component (350,000 square feet). The new University Village will have a range of storefront configurations that will appeal to different types of local neighborhood-serving businesses. USC will also provide a Façade Improvement Program for small businesses in certain areas to address minor façade changes and selected maintenance.
- The Supplier Diversity Services' Local Vendor Program is provided to ensure diversity in suppliers and vendors to USC. This is explained in detail below.

Supplier Diversity Services' Local Vendor Program

This program ensures that neighborhood merchants have the opportunity to compete for University Projects. This fosters economic growth in California through campus use of businesses owned by minorities, women, and veterans, and small local businesses in the communities surrounding USC's campuses. USC has a goal to procure 15% of all purchases, regardless of source of funds, from Diverse Suppliers. Currently, the university spends \$7.0 million on meeting its diversity supplier goals.

To attain these goals, Supplier Diversity Services:

- Pre-qualifies, recruits, and trains Diverse Suppliers
- Improves accessibility to and awareness of Diverse Suppliers throughout USC
- Provides an orientation to USC, "How to do Business with USC"
- Recognizes USC departments for outstanding use of Diverse Suppliers

USC also has a program for Diverse Supplier Goals for Federal & State Contracts. On behalf of units with federal and state contracts larger than \$650,000, Supplier Diversity Services:

- Develops government subcontract plans in compliance with the Federal Acquisition and Defense Federal Acquisition Regulations

***USC Nexus Study: DRAFT Response to comments received at PLUM
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- Prepares "Good Faith Effort" Diverse Supplier usage proposals
- Submits Diverse Supplier compliance reports to applicable governmental agencies

The program focuses on 26 targeted zip codes surrounding the University Park Campus, Health Sciences, Alhambra Campus and Marina del Rey Campus:

90006 90018 90062

90007 90021 90063

90008 90023 90071

90011 90031 90230

90012 90032 90231

90013 90033 90232

90014 90037 90291

90015 90043 90292

90017 90058

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

3. ISSUE: Jobs and wages from employment generated by project

A previous study prepared in May 2010 by HR&A Advisors, Inc. and entitled *An Assessment of Economic and Fiscal Impacts of the USC Development Plan, University of Southern California*, provided the numbers and types of jobs to be generated as a result of the proposed project. Appendix B of the study includes the estimated employment to be generated by the project direct jobs, as well as the estimated compensation. The findings presented in this study were incorporated into the Nexus Study.

USC is the largest employer in Southern California, and the existing campus generates 29,578 jobs and \$1.1 billion in compensation paid to workers (EIR, Section IV.1.1 Table IV.I-7). Annual operation of the completed project will generate 3,514 jobs, with an estimated 2,200 direct jobs in the Sub-area 3 retail, hotel, lab school, and academic positions.³ The estimated annual wages (in 2009 dollars) for the types of jobs range from \$21,000 for the service and retail jobs, to \$39,000 dollars for educational jobs provided at USC. As Table 1 on the following page indicates, about 90 percent of these jobs have wages above the City Living Wage of \$23,480 (in 2009 dollars). The majority of the direct jobs (1,452) are in education, and compensation for these jobs is well above the City's Living Wage. The City Living Wage was established by Ordinance 171547 to require payment of a higher minimum level of compensation to city contracts than that set by federal and state minimum wage laws. In this context, it acts as benchmark for a living wage in Los Angeles.

Other benchmarks include the California minimum wage (\$14,895 in 2009 dollars on an annualized basis). Also, for purposes of defining affordable housing, Federal, State and local laws typically define households within household income bands measured relative to the median family income (MFI) within a particular geographic area. The lowest income category defined is "extremely low", or 30 percent of the area income. For Los Angeles County in 2009, this category ranged from \$16,650 for a household of one person to \$31,400 for a household of 8 people.

With the loss of jobs in the State as well as other parts of the country, any new job would be considered a benefit to the area. The national recession that began in December 2007 has cost the State 1,392,000 jobs as of December 2009, including

³ The analysis uses an econometric tool known as IMPLAN (Impact analysis for PLANning) input/output model to illustrate the economic impacts of anticipated construction activities and from the project-generated permanent jobs. The model estimates direct impacts expressed in terms of job creation, including estimated wages, economic output, and employment based on known inputs such as budgetary expenses, construction cost estimates or wages.

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750,000 jobs in southern California, or 54 percent of the statewide total (DEIR, Employment). Economic forecasters expect unemployment in the State to remain at elevated levels throughout the next several years, and growth in personal income to persist at rates below historical trends. In this particular climate, all types of jobs should be viewed as a contributor to help strengthen the City’s economic base.

Table 1: Estimated Project Direct Jobs and Annual Wages (in 2009 dollars)

Job Category	Average Annual Wages	Total Jobs	% of Total Jobs
Fitness and recreational Sports Centers	\$21,177	45	2.0%
Retail Miscellaneous	\$21,315	143	6.5%
Food Services & Drinking Places	\$22,990	24	1.1%
Other, Amusement and Recreation	\$26,756	79	3.6%
General Merchandise	\$27,173	143	6.5%
Retail Food and Beverage	\$32,231	2	0.1%
Hotels	\$37,263	221	10.0%
Private Elementary and Secondary Schools	\$38,899	91	4.1%
Junior Colleges, Colleges, Universities and Professional Schools	\$38,981	1,452	66.0%
	\$35,905	2,200	100.0%
City Living Wage (Ordinance No. 171547)			\$ 23,480
Percent of total jobs above City Living Wage			90.4%
Sources: HR&A Advisors, Inc. May, 2010, <i>An Assessment of Economic and Fiscal Impacts of the University of Southern USC Development Plan</i> ,			
Bureau of Labor Statistics, Consumer Price Index, All Urban Customers, western region.			

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

4. ISSUE: Community access to the jobs provided by the project

The following represents the university's current commitment to hire locally and support local vendors. As part of the project approval process, the University will consider a Project Labor Agreement (PLA) with the trade unions and other union workers that will include a local hire provision. The geographic area to be established for this agreement will include the Nexus Study area. Currently, no formal agreement is in place outside of the University's voluntary procurement and hiring policy.

USC Community Hiring

In 1992, former USC President Steven B. Sample articulated five university-wide community initiatives designed to make a positive difference in the neighborhoods surrounding USC's University Park and Health Sciences campuses. These included Education, Public Safety, Economic Development, Housing and Community Hiring. All community efforts continue to function under the University's current USC President C.L. Max Nikias.

The Community Hiring Initiative calls for the university to "preferentially employ at USC more persons who have lived in our immediate neighborhoods for all of the past five years." The geographic scope of the initiative covers an eight zip code area:

University Park Campus: 90007, 90018, 90037, and 90062

Health Sciences Campus: 90031, 90032, 90033, and 90063

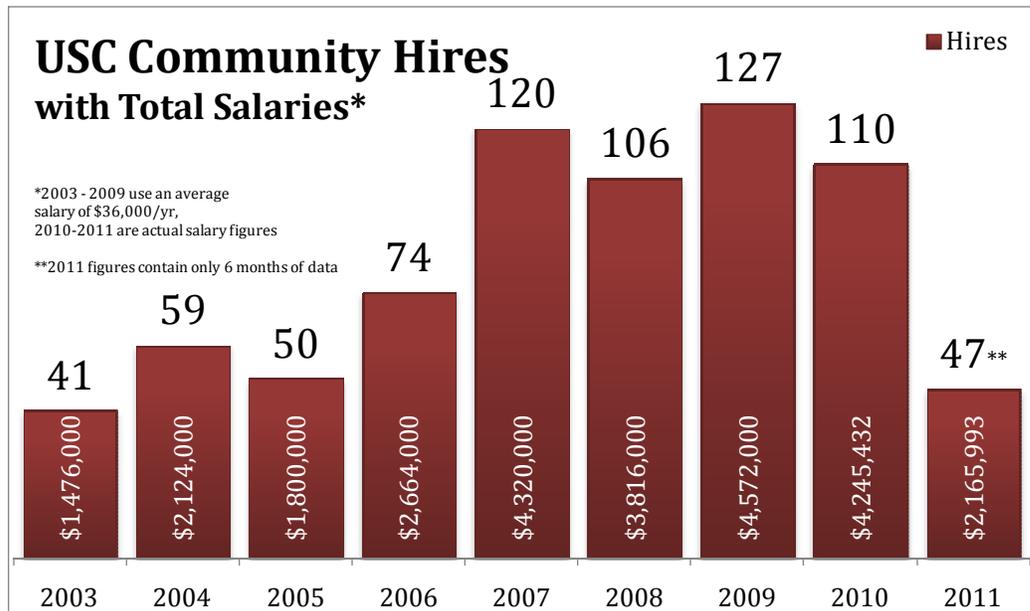
At present, the Talent and Performance Innovation Department, in collaboration with Government and Civic Engagement, is primarily focused on community hiring outreach as a driver to improve the quality of life in our communities. Our vision includes partnerships between city and state governments, communities, employers, educational institutions and community-based organizations.

Examples of positions for which community members have been hired include:

Administrative Assistants, Animal Laboratory Tech, Child Care Teacher, Biller, Cashier-Food Services., Clinic Assistant, Groundskeeper, Community Service Officer, Credit Union Teller, Culinary Specialist, Custodian, Dental Assistant, Electrician, Facilities Assistant, Food Production Helper, Guest Services Representative, HD Payroll/Personnel Coordinator, Library Assistant, Mail & Material Handler, Maintenance Technician, Material Handler, Medical Assistant, Office Assistant, Payroll Records Specialist, Postal Clerk, Program Assistant, Program Specialist Project Assistant, and Project Manager

The chart below provides yearly community hiring data between 2003 -2011.

**USC Nexus Study: DRAFT Response to comments received at PLUM
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Current Strategies

- Aggressive attendance at local job fairs
- Diversity recruiting efforts
- Marketing job openings through community based organizations
- Regular presentations at the local WorkSource Centers

Potential Strategies

- Identifying USC position pipelines and matching openings with locally available vocational training
- Obtaining stimulus money and grants to increase community vocational training opportunities
- Partnering with local schools to develop community educational programs in job readiness
- Creating a “First Source” hire program to provide local community members with early access to job openings across the city

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

5. ISSUE: Construction jobs and wages

A previous study prepared in May 2010 by HR&A Advisors, Inc. and entitled *An Assessment of Economic and Fiscal Impacts of the USC Development Plan, University of Southern California*, provided the numbers and types of jobs to be generated as a result of the proposed project. This included both permanent direct jobs and temporary construction jobs. An estimated 4,894 construction jobs will be generated by the proposed project. The average annual wage for construction jobs in Los Angeles County in 2009 was \$58,000 (California Employment Development Department). This is more than twice as high as the City of Los Angeles living wage of \$23,480, and almost four times as high as the State of California minimum wage, which was \$14,895 (in 2009 dollars) on an annualized basis. For purposes of defining affordable housing, Federal, State and local laws typically define households within household income bands measured relative to the median family income (MFI) within a particular geographic area. The lowest income category defined is “extremely low”, or 30 percent of the area income. For Los Angeles County in 2009, this ranged from \$16,650 for a household of one person to \$31,400 for a household of 8 people.

6. ISSUE AREA: Jobs for the hotel component of the project.

A previous study prepared in May 2010 by HR&A Advisors, Inc. and entitled *An Assessment of Economic and Fiscal Impacts of the USC Development Plan, University of Southern California*, provided the numbers and types of jobs to be generated as a result of the proposed project. Direct jobs for the hotel were estimated using an employment density factor of 1.13 jobs per square foot. The hotel is estimated at 165,000 square feet, which includes a large conference facility of 50,000 square feet and 150 rooms. Typically, a worker per room factor is used for traveler-oriented lodging facilities that consist primarily of rooms. Square footage is a more accurate way to estimate the total number of jobs the hotel will create because it captures all of the jobs created by the hotel. In addition to the conference area, the hotel consists of 115,000 square feet of lodging rooms, back of house area, restaurant and ancillary space (gift shop retail). If employment is attributed to the entire square footage, then all jobs, including housekeeping staff, maintenance workers, retail, bellhops, food service workers, parking attendants, administrative, and management workers are accounted for as well.

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7. ISSUE: Park acreage in the Nexus Study Area

The Parks Gap Analysis (Appendix D) of the Nexus Study indicated that there is an existing shortage of parks in the Nexus Study area. Based on an estimated 2009 population of 84,481 in the Nexus Study Area and the City's service standard, the Nexus Study area has a deficiency in park acreage, with an estimated additional 124 acres of neighborhood parks and 169 acres of Community Parks needed to meet the City's recommended service level. USC is not responsible for reducing this existing deficiency in park acreage for the Nexus Study area, but is required to contribute open space acreage to meet the demand of the population generated by the USC project. This population consists of students, staff and faculty.

Using the recommended standard of 3 acres of acreage per 1,000 population, the project population of 4,656 will generate a need for an additional 14 acres of open space and park acreage. Through the proposed project's provision of 17.53 acres of passive and active open space, the requirement for open space would be adequately met.

Since the project population is more likely to use the park space on campus provided by USC rather than the public parks in the Nexus Study area, the proposed project would not substantially increase the use of off-site neighborhood and regional parks and recreational facilities. However, as a public benefit, USC will also provide active or passive open space outside of the USC Specific Plan area for use by the Nexus Study area community. USC already does, and will continue to contribute resources for parks programming, such as after-school sports instruction and dance classes or alternate programs.

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

8. ISSUE: Housing demand and loss of market-rate and affordable units due to displacement by USC students

- Address the demand for housing as a result of future Transit-Oriented Development (TOD) and the Exposition (Expo) light rail line being constructed in the area.

A report entitled *Los Angeles TOD Plans & Market Studies*, was prepared in July 2011, by IBI Group in association with Meléndrez and Strategic Economics. This study indicated that the Exposition Line light rail will increase the demand for housing in the Nexus Study Area (page 40). According to this study, the Expo Line is likely to drive increases in demand for housing, as the area will become considerably more attractive to new residents as the Expo Line will connect it with downtown, Culver City, and eventually Santa Monica once that extension is built. This supports the University's goal to create 5,200 new beds, which will help address the demand cited in the report.

- Potential increase in housing prices due to the new Expo Line

Any impact on housing prices due to the Expo Line would occur independently of the USC Development Plan, and the City must address this in the context of broader planning and policy efforts. To that end, the City recently enacted a Neighborhood Stabilization Overlay to protect existing single-family residences in the area from being converted to student housing rental units. In addition, the City is now also working on incentives that would foster the development of student housing along major corridors such as Figueroa Street and Jefferson Boulevard. Collectively, these two measures would help reduce pressure on housing prices and maintain rents at an affordable rate for families.

- Displacement of non-USC residents by USC students

While the IBI study indicated that a high share of renters and low-income households can make the existing community vulnerable to displacement, increasing the supply of residential units within station areas would help to meet the increased demand. The City of Los Angeles Rent Stabilization Ordinance currently helps to protect renters in multi-family buildings by limiting annual rent increase amounts. The City has taken action, to focus student housing on the corridors and adopting a neighborhood stabilization overlay to prevent landlords from illegally converting their units to student housing. In addition, USC is in discussion with the Los Angeles Housing Department to create a Revolving Loan Fund available to the community for the conversion of illegal units and rehabilitation of existing housing units for specified areas.

USC Nexus Study: DRAFT Response to comments received at PLUM Update August 2, 2011

The Nexus Study (page b-39) showed that with the added supply of housing on the USC campus resulting from the Project, plus the addition of currently planned privately developed student housing, fewer rental units in the Nexus Study Area's private housing market will be occupied by USC populations, and there will be reduction in the percentage of housing demand that will be met outside the Nexus Study Area. This means that more private dwelling units in the Nexus Study Area will be available to non-USC households. It was estimated that the share of USC student-occupied private market rental units would decrease from 23.1 percent in 2009 to 14.9 percent in 2030.

As noted in the Nexus Study, it is estimated that 896 units of rental housing in the local area are likely to be vacated by USC students and faculty 2030 due to the combination of construction of new student and faculty housing as part of the project, and the privately developed student housing in the Nexus Study Area. The average occupancy of units likely to be vacated by USC populations (average 3.03 persons per household) is similar to the average occupancy of the local area as a whole (3.15 persons). Thus, the units vacated by USC populations could absorb households similar in size to the average for the local area that may now be looking for housing in neighboring communities or other areas of Los Angeles.

- What is the current count of students living on the USC campus or in the surrounding community?

The EIR states that as of 2009, 8,462 students lived in USC owned or affiliated housing, and 8,515 students lived in private housing within the local area. Since that time, an estimated 2,200 beds have been added to the local area supply by the private market with University Gateway, West 27th Place and The New Mansion. USC has indicated that these units are occupied by former commuter students or students from surrounding neighborhood housing, and this increase in supply since 2009 has exceeded student enrollment increases. According to USC, there is anecdotal evidence from property owners in the area that the increased supply has reduced the existing rents for private market student housing.

- Research USC housing policies over the past 30 years

According to USC, the University did not have a formal strategic plan for housing its students for much of the last 30 years. However, with the adoption of its master plan in 2008, the University established clear goals to guarantee housing for all four years of the undergraduate education, and to guarantee housing for the first year for its graduate students. The university also requires all first year students to live on-campus. This policy was stated in May 2009 when the board of trustees approved University Park Master Plan.

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- The Nexus Study includes the count of private student housing units in its totals of student housing. Some community members disagree with this approach.

The University believes that the Nexus Study should count privately owned, non-university student housing in the total student housing inventory. Much of the private student housing in this vicinity of campus was built for the sole purpose of housing USC students. As an example, a project such as University Gateway is a development that was built as student housing and is occupied as student housing. City policy supports this position --- the City Council added a footnote to the South Los Angeles Community Plan to incentivize the construction of projects reserved for and designed primarily to house students and/or students and their families in privately built student housing on the Figueroa Corridor.