

ATTACHMENT “A”
Request for Project Permit Compliance Modification and “Q” Clarification
312 - 328 N. Juanita Avenue, 317 - 345 N. Madison Avenue,
and 3810 - 3838 W. Oakwood Avenue
CPC-2019-5596-GPAJ-ZCJ-SP-SPP-SPR

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

1. Pursuant to **LAMC Section 11.5.7 D**, the Applicant requests a modification to a previously approved 454 unit Permanent Supportive Housing project. The modification is required to clarify the phased nature of the project and to reflect design modifications due to funding and constructability.
2. Pursuant to **LAMC Section 12.32.H**, the Applicant request an Amendment to Council Instruction to clarify “Q” Condition No. 1 of Ordinance No. 186,704 for approval of a modified Exhibit “A.”

Background

On June 4, 2020, the City Planning Commission approved CPC-2019-5596-GPAJ-ZCJ-SP-SPP-SPR for the construction, use and maintenance of a Permanent Supportive Housing (PSH) Project consisting of five buildings with up to 454 dwelling units with 100% affordable dwelling units excluding 5 manager’s units (the “Project”). It is located on an approximate 94,623 square foot (2.17 acre) property, bounded by Juanita Avenue, Madison Avenue and Oakwood Avenue in the Wilshire Community Plan of the City of Los Angeles (the “Project Site”).

On August 19, 2020, Ordinance No. 186,704 came into effect, which enacted a zone change on the Project Site from M1-1 Zone (Limited Industrial) to [T][Q]CM-1 Zone (Commercial Manufacturing). On October 5, 2020, Ordinance No. 186,735 came into effect, which established new definitions and development standards for a Subarea D.2 (Permanent Supportive Housing) of the Vermont Western Station Neighborhood Area Plan (the “SNAP”). Both legislative actions enable the construction of Permanent Supportive Housing at the Project Site.

Since the Project was approved, the Project has been modified to enhance the financial feasibility of the project, including a phasing plan and reduction in project size, to respond to Department concerns and to accommodate details refined during the construction drawing process. Consequently, the Applicant requests a modification for the updated architectural drawings (revised Exhibit “A” dated August 31, 2021) for the development. In order to facilitate your review, we have provided a written narrative regarding design changes.

Due to the phasing and design changes, the Applicant also requests an Amendment to Council Instruction of Ordinance No. 186,704 and a Modification to the Specific Plan Project Permit Compliance. The proposed changes to the conditions of approval are notated below using a redline format (strikeout for deletions and an underline for additions). While each change includes a justification, the main focus is to allow for a financially feasible and phased project.

Summary of Design Changes

The Project's revised drawings are in substantial conformance with the existing site plan, design intent and spirit of the entitlement. The original design intent, as expressed in the approved Plans, is constructing urgently needed PSH housing, which remains at the forefront of the Enlightenment Plaza development. The proposed changes to Enlightenment Plaza campus maintain the core design characteristics that were ingrained into the project from the beginning.

The proposed updates strengthen the strategy of connectivity between building entrances and ease of access from a central hybrid plaza/paseo spine that opens to an expansive park off the Madison Avenue's eastern side of the project. Each building has distinctive design features that provide individuality yet integrated nature through corresponsive language that ties the campus together. Each building, designed with modular construction, continues to utilize a variety of plane breaks, including balconies and material changes. Wrap around supportive services will be provided on-site throughout the campus.

The original design's intent has been sharpened to promote cohesive façade relief elements as well as material choices. The updated design utilizes the same material palette, along with the same articulation language, while offering new applications to enhance spatial awareness and wayfinding. Each building's lobby entrances will be wrapped in storefront glazing and each building's vertical circulations will be clad in an enhanced material. The connection through outdoor spaces and visual connection points between the buildings have been maintained. Decks have been located above each lobby, and landings at each level opened to the outside create vertical transitions.

The Project, as entitled, was designed to maximize the number of PSH units based on a variety of financing opportunities. The financing is very competitive, which makes it difficult to succeed with every funding opportunity. Consequently, there will neither be the financing available to build the entire Project at once nor a plan to build the Project at the maximum density previously approved.

In response to funding availability, the architectural design has been modified by reducing the size of some buildings, as well as modifying the density, unit type, floor area and height to match the financing opportunities available while maintaining the overall design aesthetic.

Table 1. Summary of Approved and Modified Density

Building	Approved Density (Units)	Modified Density (Units)
SW-A Building (Rousseau Residences)	74	52
SW-B Building (Montesquieu Manor)	63	53
NW Building (Voltaire Villas)	84	72
NE Building (Locke Lofts)	143	148
SE Building	90	62
Total	454	387

Additional refinements were triggered by comments from the Department of Water and Power (DWP) and the Los Angeles Fire Department (LAFD). Since the Project was entitled, DWP has started enforcing their requirement that the transformer staging area be located on site rather than in a public right of way. The entitled Project assumed the staging area would be in the public right of way and located individual transformers adjacent to each building at the street. DWP also recommended the Project to obtain its power off a recently installed service line located within Madison Avenue. Based on that direction, as depicted in the attached Site Plan, all of the transformers are now located in a single location off of Madison within Airspace Lot 3 site. Meanwhile, in order to avoid a fire lane running in between the NW and SW structures, the SW - B and NW buildings floor plates were slightly shifted to maintain a 150-foot exiting requirement which allows for the elimination for a fire lane. In order to maintain required openings and transparency, the minor modifications to the lot lines of the Air Space lots 4, 5 and 6 are required. Additionally, podiums were removed from the first phase building(s) eliminating parking from their design. Parking will be provided on a surface parking area until the future phases are completed.

Table 2. Revised Project Data Summary

Building	Phase	Density (Units)	Floor Area (SF)	Supportive Services (SF)	Height	Stories
SW-A Building (Rousseau Residences)	I	52	24,873	397	73'-4"	5 stories
SW-B Building (Montesquieu Manor)	I	53	28,293	1,075	90'-11"	6 stories
NW Building (Voltaire Villas)	I	72	38,368	1,394	84'-6"	6 stories
NE Building (Locke Lofts)	II	148	76,574	3,155	88'-10"	6 stories
SE Building	III	62	29,172	569	96'-7"	7 stories
Total		387	197,280	6,590		

PROPOSED MODIFICATIONS TO CPC-2019-5596-GPAJ-ZCJ-SP-SPP-SPR

PROJECT DESCRIPTION

Project Description - As Approved

Construction, use and maintenance of 454 Permanent Supportive Housing units; 23 restricted to Extremely Low Income, 50 restricted to Very Low Income, 376 restricted to Low Income Households, and five market rate manager's units on a 94,623 square foot site. The proposed project includes five eight-story buildings, including the Northeast, Northwest, Southeast, Southwest-A and Southwest-B Buildings with maximum building heights ranging from 92 feet to 95 feet, and a total of 247,812 square feet of floor area including a total of 11,772 square feet of

resident supportive services space (including 5,700 square feet of case management service area as well as 6,072 square feet of interior open space). The Project will provide 23 vehicular parking spaces located at grade and 251 bicycle spaces; and will provide a total of 36,580 square feet of open space (including interior and exterior open space).

Project Description - Redline

Phased cConstruction, use and maintenance of **up to 387** Permanent Supportive Housing units; ~~23 restricted to Extremely Low Income, 50 restricted to Very Low Income, 376 restricted to Low Income Households, and five market rate manager's units~~ on a 94,623 square foot site. The proposed project includes **three phases: Phase I includes one five-story building and two six-story building with maximum building heights ranging from 73'-4" to 90'-11" totaling 177 dwelling units, 91,534 square feet of floor area and the construction of a surface parking lot with 9 parking spaces; Phase II includes the construction of a landscaped courtyard as well as one six-story building with a maximum building height of 88'-10" totaling 148 dwelling units and approximately 76,574 square feet of floor area; and Phase III includes the demolition of the Phase I surface parking lot for the construction of a new seven-story building with a maximum building height of 96'-7" totaling 62 dwelling units and approximately 29,172 square feet of construction. five eight-story buildings, including the Northeast, Northwest, Southeast, Southwest-A and Southwest-B Buildings with maximum building heights ranging from 92 feet to 95 feet, and a total of 247,812 square feet of floor area including a total of 11,772 square feet of resident supportive services space (including 5,700 square feet of case management service area as well as 6,072 square feet of interior open space). The Project will provide 23 vehicular parking spaces located at grade and 251 bicycle spaces; and will provide a total of 36,580 square feet of open space (including interior and exterior open space).**

Project Description - Clean

Phased construction, use and maintenance of up to 387 Permanent Supportive Housing units; on a 94,623 square foot site. The proposed project includes three phases: Phase I includes one five-story building and two six-story building with maximum building heights ranging from 73'-4" to 90'-11" totaling 177 dwelling units, 91,534 square feet of floor area and the construction of a surface parking lot with 9 parking spaces; Phase II includes the construction of a landscaped courtyard as well as one six-story building with a maximum building height of 88'-10" totaling 148 dwelling units and approximately 76,574 square feet of floor area; and Phase III includes the demolition of the Phase I surface parking lot for the construction of a new seven-story building with a maximum building height of 96'-7" totaling 62 dwelling units and approximately 29,172 square feet of construction. .

DEVELOPMENT CONDITIONS - General Plan Amendment/Zone Change Conditions

The Applicant suggests referring to these conditions as General Plan Amendment/Zone Change Conditions for clarify in lieu of the more general "Development Conditions."

CONDITION NO. 1

No modification proposed to the text of this condition. However, a revised Exhibit "A" is proposed as part of this request.

CONDITION NO. 2

No modification proposed.

CONDITION NO. 3

Condition No. 3. As Approved.

3. **On-Site Restricted Affordable Units.** A minimum of 449 units shall be designated as Restricted Affordable Units with 23 units reserved for Extremely Low Income Households, 50 units reserved for Very Low Income Households, and 376 units reserved for Low Income Households as defined by LAMC Section 11.5.11. The 449 units shall be reserved for Extremely Low, Very Low and Low Income Households as determined by the California Department of Housing and Community Development ("HCD").

Condition No. 3. Redline

3. **On-Site Restricted Affordable Units.** ~~A minimum of 449 units shall be designated as Restricted Affordable Units with 23 units reserved for Extremely Low Income Households, 50 units reserved for Very Low Income Households, and 376 units reserved for Low Income Households~~ Each phase shall reserve at least a 5% of the total units at rents affordable to Extremely Low Income Households and 11% set aside for Very Low Income Households, inclusive of any Replacement Units, as defined by LAMC Section 11.5.11 (a) 1 (iii). These ~~The 449~~ affordable units shall be reserved for Extremely Low, ~~and~~ and Very Low ~~and Low Income Households~~ as determined by the California Department of Housing and Community Development ("HCD");

Phase I: A minimum of 9 units shall be reserved for Extremely Low Income Households and a minimum of 20 units shall be reserved for Very Low Income Households.

Phase II: A minimum of 8 units shall be reserved for Extremely Low Income Households and a minimum of 17 units shall be reserved for Very Low Income Households.

Phase III: A minimum of 4 units shall be reserved for Extremely Low Income Households and a minimum of 7 units shall be reserved for Very Low Income Households.

Excluding six manager's units, the remaining units shall be reserved for Low Income Households consistent Ordinance No. 186,635 which allows rents defined by the United States Department of Housing and Urban Development ("HUD").

Condition No. 3. Clean

3. **On-Site Restricted Affordable Units.** Each phase shall reserve at least a 5% of the total units at rents affordable to Extremely Low Income Households, and 11% set aside for Very Low Income Households, inclusive of any Replacement Units, as defined by LAMC Section 11.5.11(a)(1)(iii). These affordable units shall be reserved for Extremely Low and Very Low as determined by the California Department of Housing and Community Development ("HCD");

Phase I: A minimum of 9 units shall be reserved for Extremely Low Income Households and a minimum of 20 units shall be reserved for Very Low Income Households.

Phase II: A minimum of 8 units shall be reserved for Extremely Low Income Households and a minimum of 17 units shall be reserved for Very Low Income Households.

Phase III: A minimum of 4 units shall be reserved for Extremely Low Income Households and a minimum of 7 units shall be reserved for Very Low Income Households.

Excluding six manager's units, the remaining units shall be reserved for Low Income Households consistent with Ordinance No. 186,635 which allows rents defined by the United States Department of Housing and Urban Development ("HUD").

Condition No. 3. Justification

Pursuant to LAMC Section 11.5.11(a)(1)(iii), all General Plan amendments or zone changes that allow residential uses where previously not allowed must meet an on-site affordability provision. LAMC Section 11.5.11(a)(1)(iii) outlines on-site affordability options for rental projects as follows:

If the General Plan amendment, zone change or height district change allows a residential use where not previously allowed, then the Project shall provide no less than 5% of the total units at rents affordable to Extremely Low Income households, and either 11% of the total units at rents affordable to Very Low Income households or 20% of the total units at rents affordable to Lower Income households, inclusive of any Replacement Units.

The modification is required to allow the Project to be built in Phases while ensuring that the Project is following the affordability requirements outlined in LAMC Section 11.5.11 for permitting residential uses where residential uses were not previously allowed.

While the Project is required to be 100% restricted affordable, this affordability requirement comes from the SNAP Subarea D.2 (Ordinance No. 186,635). SNAP Subarea D.2 requires a different level of affordability as determined by HUD rather than HCD, so the proposed modification includes the HUD rents. Permitting HUD rents is critical for the financial feasibility of the project.

CONDITION NO. 4

4. **Qualified Permanent Supportive Housing.** A minimum of 449 units shall be occupied by the Target Population, as defined by Section 50675.14 of the Health and Safety Code.

Condition No. 4 Redline

~~4. **Qualified Permanent Supportive Housing.** A minimum of 449 units shall be occupied by the Target Population, as defined by Section 50675.14 of the Health and Safety Code. Changes in Restricted Units. Deviations that change the composition of units in a phase shall be consistent with LAMC Section 11.5.11(a)(1)(iii).~~

Condition No. 4. Clean

4. **Changes in Restricted Units.** Deviations that change the composition of units in a phase shall be consistent with LAMC Section 11.5.11(a)(1)(iii).

Condition No. 4. Justification

The proposed modification will relocate Condition No. 8, which allows for recalculations of restricted affordable units if the number of dwelling units changes. The redraft of Condition No. 3 assumes that Phase I includes 177 dwelling units, Phase II includes 148 dwelling units and Phase III includes 62 dwelling units. In the event that Phase II or Phase III includes less or more units than currently proposed, though not to exceed 454 units, then this condition would allow for the percentage of extremely low and very low income units to be recalculated accordingly.

The proposed modification will also relocate the requirements for Qualifies Permanent Supportive Housing and target population to the SNAP Project Permit Compliance Review Conditions to be consistent with Subarea D.2, which was not in effect at the time of entitlement approval.

CONDITION NO. 5

Delete and relocate under SNAP Project Permit Compliance Review Conditions to be consistent with Subarea D.2.

CONDITION NO. 6

Delete and relocate under SNAP Project Permit Compliance Review Conditions to be consistent with Subarea D.2.

CONDITION NO. 7

Delete and relocate under SNAP Project Permit Compliance Review Conditions to be consistent with Subarea D.2.

CONDITION NO. 8

Relocated to Condition No. 4 to be in tandem with Condition No. 3, which includes the affordability requirements pursuant to Measure JJJ.

CONDITION NO. 9.a

a. **Open Space.** The project shall provide 36,580 square feet of open space in lieu of the 45,725 square feet of open space pursuant to LAMC Section 12.21 G.

Condition No. 9.a Redline

a. **Open Space.** The project shall provide ~~36,580 square feet of open space in lieu of the 45,725 square feet of~~ open space pursuant to LAMC Section 12.21 G, except that a 20% reduction in open space may be utilized. The project shall provide the following minimum open space per phase:

Phase I: The Project shall provide 14,220 square feet of open space.

Phase II: The Project shall provide 12,060 square feet of open space.

Phase III: The Project shall provide 4,980 square feet of open space.

Any excess open space developed in a phase may be applied toward the required open space of a later phase. Deviations that change the quantity or composition of units in a phase shall be recalculated consistent with LAMC Section 12.21.G with a 20% reduction.

Condition No. 9a Clean

a. Open Space. The project shall provide open space pursuant to LAMC Section 12.21 G, except that a 20% reduction in open space may be utilized. The project shall provide the following minimum open space per phase:

Phase I: The Project shall provide 14,220 square feet of open space.

Phase II: The Project shall provide 12,060 square feet of open space.

Phase III: The Project shall provide 4,980 square feet of open space.

Any excess open space developed in a phase may be applied toward the required open space of a later phase. Deviations that change the quantity or composition of units in a phase shall be recalculated consistent with LAMC Section 12.21.G with a 20% reduction.

Condition No. 9a Justification

As a phased project, it would be impossible for the Project to provide the required open space for all three phases in the first phase. As a result, the proposed modification disperses the open space requirement across all three phases.

Table 3. Proposed Open Space with 20% Reduction

Phase	Units	LAMC 12.21.G	20% Reduction
I	177	17,775	14,220 SF
II	148	15,075 SF	12,060 SF
III	62	6,225 SF	4,980 SF

It is also important that the condition clarify that each phase is not required to develop the minimum open space, but rather that the minimum open space be available on-site after a phase is constructed. Thus, if excess open space is developed in an earlier phase, it should be counted toward a requirement of a later phase, if applicable.

Lastly, if there are changes to the quantity or composition of dwelling units future phases, the minimum open space requirement should be recalculated. The Project should not be required to provide open space for dwelling units that are not constructed.

CONDITION NO. 10

Delete. The Electric Vehicle Parking condition is unnecessary provided that it only refers to a different Code section, which is already a requirement that will be enforced by LADBS during plan check.

CONDITION NO. 11

Delete. This is a duplicate condition which is more appropriately located in the SNAP Project Permit Compliance Review Conditions. See Condition No. 22 below.

SNAP PROJECT PERMIT COMPLIANCE REVIEW CONDITIONS (Ordinance No. 186,735)

CONDITION NO. 4

4. **Qualified Permanent Supportive Housing.** A minimum of 449 units shall be occupied by the Target Population, as defined by Section 50675.14 of the Health and Safety Code.

Condition No. 4 Redline

4. **Qualified Permanent Supportive Housing.** ~~A minimum of 449 units~~ 100% of the total dwelling units, excluding one unrestricted manager's unit per building, shall be occupied by the Target Population, as defined by ~~Section 50675.14 of the Health and Safety Code~~ Section 4 of the SNAP.

Condition No. 4 Clean

4. **Qualified Permanent Supportive Housing.** 100% of the total dwelling units, excluding one unrestricted manager's unit per building, shall be occupied by the Target Population, as defined by Section 4 of the SNAP.

Condition No. 4 Justification

The proposed modification will relocate the requirements for Qualifies Permanent Supportive Housing and target population to the SNAP Project Permit Compliance Review Conditions to be consistent with Subarea D.2, which was not in effect at the time of entitlement approval.

As a phased project, the Applicant cannot covenant all proposed dwelling units to the target population during the first phase. The proposed revision allows for one unrestricted manager's unit per building while allowing the flexibility for the total unit count to change in the event the Applicant does not have the funding to construct all the approved dwelling units.

The original approval points to Section 50675.14(a)(3)(A) of the Health and Safety Code to define "Target Population" as persons, including persons with disabilities, and families who are "homeless," as that term is defined by Section 11302 of Title 42 of the United States Code, or who are "homeless youth," as that term is defined by paragraph (2) of subdivision (e) of Section 12957 of the Government Code.

However, the Project is located in Subarea D.2 of the SNAP, established by Ordinance No. 186,735, which has its own definition of Target Population: "Persons with qualifying lower incomes who (i) have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, and are homeless as defined by any Los Angeles City, Los Angeles County, State of California, or Federal guidelines; or (ii) are chronically homeless, as defined by any Los Angeles City, Los Angeles County, State of California, or Federal guidelines."

While the differences between the two are minor, it is illogical for the Project to be subject to two

separate definitions of Target Population. Consequently, we request that the City insert the language from the Subarea D.2 definition as well as list the Target Population condition under the SNAP Project Permit Compliance Conditions for clarity.

CONDITION NO. 5

No change proposed, however, the Applicant requests this condition be relocated to the Specific Plan Project Permit Compliance conditions since the QPSH requirement is triggered by SNAP Subarea D.2.

CONDITION NO. 6

6. Onsite Supportive Services. At least 3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens. The project will provide a minimum of 5,700 square feet of case management services, as provided in Exhibit "A".

Condition No. 6 Redline

6. Onsite Supportive Services. At least 3 percent of the total ~~nonresidential~~ floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens. ~~The project will provide a minimum of 5,700 square feet of case management services, as provided in Exhibit "A".~~

Condition No. 6 Clean

6. Onsite Supportive Services. At least 3 percent of the total floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.

Condition No. 6 Justification

The requirement outlined in Ordinance No. 186,735/SNAP Subarea D.2 is for Qualified Permanent Supportive Housing Projects with greater than 20 dwelling units to provide a minimum of 3% of the total *residential* floor area for on-site supportive services provided solely to Project residents, including but not limited to community rooms, case management offices, computer rooms, and/or a community kitchen. Since the Project is 100% residential, it is illogical to qualify the Project's floor area as residential or non-residential. Moreover, it will help streamline condition clearance if the language does not reference use that are not a part of the project.

The overall Project, as approved, consisted of approximately 247,812 square feet of floor area which would require approximately 7,400 square feet of services. According to the provided drawings, the on-site supportive services requirement was satisfied with 11,772 square feet, or 4.7% of residential floor area, for "on-site supportive services which consisted of approximately 5,700 square feet of case management and 6,072 square feet of common recreation rooms. The Letter of Determination only referenced the 5,700 square feet.

As written, the Condition does not acknowledge that supportive services can be satisfied with common areas as well as case management rooms, nor does it allow for the Phased construction

of the Project or a possibility of the reduction in floor area. Since the Project will be developed in phases and possibly at a smaller footprint, it is infeasible to provide all the Project's total Supportive Services requirement in the first phase of development.

Consequently, we respectfully request that the Condition be amended to reference 3% of the total floor area to be dedicated to Supportive Services without referring to any specific absolute minimums to reduce ambiguity regarding the definition of supportive services.

CONDITION NO. 7

7. Housing Requirements. Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to reserve 23 units for Extremely Low Income Households and 50 units for Very Low Income Households, and 376 units for Low Income Households or sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years as determined by HCD. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA.

Condition No. 7 Redline

7. Housing Requirements. Prior to issuance of a building permit, for a building, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to reserve ~~23 units for Extremely Low Income Households and 50 units for Very Low Income Households, and 376 units for Low Income Households or sale or rental as determined to be affordable to such households~~ all units for Low Income Households as defined by the United States Department of Housing and Urban Development (HUD) by HCIDLA for a period of 55 years, except for one to two unrestricted manager's units per building (not to exceed six manager's units total) and for the restricted affordable units provided to satisfy the requirements of LAMC Section 11.5.11 (a) 1 (iii) as outlined in Condition No. 3. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA.

Condition No. 7 Clean

7. Housing Requirements. Prior to issuance of a building permit for a building, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to reserve all units for Low Income Households as defined by the United States Department of Housing and Urban Development (HUD) for a period of 55 years, except for one to two unrestricted manager's units per building (not to exceed six manager's units total) and for the restricted affordable units provided to satisfy the requirements of LAMC Section 11.5.11 (a) 1 (iii) as outlined in Condition No. 3. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA.

Condition No. 7 Justification

The elimination of the absolute number of units required for the set aside will allow the Project to be built in Phases. Additionally, the Section 4 of the SNAP defines a QPSH project as having at least 100% of the project occupied by at least Lower Income Households in accordance with HUD as opposed to HCD. While the Project was once utilizing a Statutory Exemption, which required all rents to be restricted at state rent levels, the Project was ultimately approved with a SCEA as its environmental document. The SCEA only requires 10% of rents to be restricted at HCD levels, which is being accounted for in by the requirements of LAMC Section 11.5.11 (see Condition No. 3). Thus, the remaining rents can be provided at levels determined by HUD, which is critical for the financial feasibility of the project.

CONDITION NO. 12

12. Parks First. Prior to the issuance of a Certificate of Occupancy, the applicant shall complete the following:

- a. Make a payment to the Department of Recreation and Parks (RAP) for the required Park Fee pursuant to LAMC Section 17.12. Contact RAP staff by email at rap.parkfees@lacity.org, by phone at (213) 202-2682 or in person at the public counter at 221 N. Figueroa St., Suite 400 (4th Floor), Los Angeles, CA 90012 to arrange for payment.
- b. Make a payment to the Parks First Trust Fund for the net increase residential dwelling units. The calculation of a Parks First Trust Fund Fee to be paid pursuant to the Vermont/Western SNAP shall be off-set by the Park Fee paid pursuant to LAMC Section 17.12 as a result of the project.
- c. The applicant shall provide proof of payment for the Park Fee to the Department of City Planning (DCP), Central Project Planning Division staff to determine the resulting amount of Parks First Trust Fund Fee to be paid. DCP staff shall sign off on the Certificate of Occupancy in the event there are no resulting Parks First Trust Fund Fee to be paid.
- d. In the event there are remaining Parks First Trust Fund Fee to be paid, the applicant shall make a payment to the Office of the City Administrative Officer (CAO), Parks First Trust Fund. Contact Jennifer Shimatsu of the CAO directly at (213) 978-7628 or Jennifer.Shimatsu@lacity.org to arrange for payment. The applicant shall submit proof of payment for the Parks First Trust Fund Fee to DCP staff, who will then sign off on the Certificate of Occupancy.
- e. All residential units in a project containing units set aside as affordable for Very Low or Low Income Households that are subsidized with public funds and/or Federal or State Tax Credits with affordability covenants of at least 30 years are exempt from the Parks First Trust Fund.

Condition No. 12 Redline

12. Parks First. Prior to the issuance of a Certificate of Occupancy for a building, the applicant shall complete the following:

- a. Make a payment to the Department of Recreation and Parks (RAP) for the required Park Fee for a building pursuant to LAMC Section 17.12. Contact RAP staff by email at

rap.parkfees@lacity.org, by phone at (213) 202-2682 or in person at the public counter at 221 N. Figueroa St., Suite 400 (4th Floor), Los Angeles, CA 90012 to arrange for payment.

b. Make a payment to the Parks First Trust Fund for the net increase residential dwelling units **for a building**. The calculation of a Parks First Trust Fund Fee to be paid pursuant to the Vermont/Western SNAP shall be off-set by the Park Fee paid pursuant to LAMC Section 17.12 as a result of the **project-building**.

c. The applicant shall provide proof of payment for the Park Fee to the Department of City Planning (DCP), Central Project Planning Division staff to determine the resulting amount of Parks First Trust Fund Fee to be paid. DCP staff shall sign off on the Certificate of Occupancy **for a building** in the event there are no resulting Parks First Trust Fund Fee to be paid.

d. In the event there are remaining Parks First Trust Fund Fee to be paid, the applicant shall make a payment to the Office of the City Administrative Officer (CAO), Parks First Trust Fund. Contact Jennifer Shimatsu of the CAO directly at (213) 978-7628 or Jennifer.Shimatsu@lacity.org to arrange for payment. The applicant shall submit proof of payment for the Parks First Trust Fund Fee to DCP staff, who will then sign off on the Certificate of Occupancy.

e. All residential units in a project containing units set aside as affordable for Very Low or Low Income Households that are subsidized with public funds and/or Federal or State Tax Credits with affordability covenants of at least 30 years are exempt from the Parks First Trust Fund.

Condition No. 12 Clean

12. Parks First. Prior to the issuance of a Certificate of Occupancy for a building, the applicant shall complete the following:

a. Make a payment to the Department of Recreation and Parks (RAP) for the required Park Fee for a building pursuant to LAMC Section 17.12. Contact RAP staff by email at rap.parkfees@lacity.org, by phone at (213) 202-2682 or in person at the public counter at 221 N. Figueroa St., Suite 400 (4th Floor), Los Angeles, CA 90012 to arrange for payment.

b. Make a payment to the Parks First Trust Fund for the net increase residential dwelling units for a building. The calculation of a Parks First Trust Fund Fee to be paid pursuant to the Vermont/Western SNAP shall be off-set by the Park Fee paid pursuant to LAMC Section 17.12 as a result of the building.

c. The applicant shall provide proof of payment for the Park Fee to the Department of City Planning (DCP), Central Project Planning Division staff to determine the resulting amount of Parks First Trust Fund Fee to be paid. DCP staff shall sign off on the Certificate of Occupancy for a building in the event there are no resulting Parks First Trust Fund Fee to be paid.

d. In the event there are remaining Parks First Trust Fund Fee to be paid, the applicant shall make a payment to the Office of the City Administrative Officer (CAO), Parks First Trust Fund. Contact Jennifer Shimatsu of the CAO directly at (213) 978-7628 or Jennifer.Shimatsu@lacity.org to arrange for payment. The applicant shall submit proof of

payment for the Parks First Trust Fund Fee to DCP staff, who will then sign off on the Certificate of Occupancy.

e. All residential units in a project containing units set aside as affordable for Very Low or Low Income Households that are subsidized with public funds and/or Federal or State Tax Credits with affordability covenants of at least 30 years are exempt from the Parks First Trust Fund.

Condition No. 12 Justification

As a phased Project, the Parks First Trust Fund Fee should be analyzed per building as opposed to by the overall Project. The proposed revisions are to clarify that the Applicant is only required to coordinate the Parks First Trust Fund for an individual building prior to Certificate of Occupancy rather than coordinate the Parks First Trust Fund Fee for all buildings prior to Certificate of Occupancy for the first building.

CONDITION NO. 13

No proposed change.

CONDITION NO. 14

14. **Floor Area Ratio.** Floor Area shall be limited to 247,812 square feet and a Floor Area Ratio of 2.8:1.

Condition No. 14 Redline

14. **Floor Area Ratio.** Floor Area shall be limited to 247,812 square feet and a Floor Area Ratio of 2.8:1. **Floor Area shall be calculated as defined in Section 10.2.G of Subarea D.2 of the SNAP.**

Condition No. 14 Clean

14. **Floor Area Ratio.** Floor Area shall be limited to 247,812 square feet and a Floor Area Ratio of 2.8:1. Floor Area shall be calculated as defined in Section 10.2.G of Subarea D.2 of the SNAP.

Condition No. 14 Justification

Floor Area for Qualified Permanent Supportive Housing Projects in Subarea D.2 of the SNAP are permitted to deduct Areas designated exclusively for supportive services uses or common areas accessible to all residents, including those for accessory residential or supportive services uses. Although the definition of Floor Area is included in the new Section 10.2 (Subarea D.2) of the SNAP pursuant to Ordinance No. 186,735, it is critical to be clear regarding the definition of floor area.

While, ultimately, the Project will not be developed to the maximum floor area included in the original approval, the Project will not exceed the permitted floor area stated in this condition so it does not need to be modified to construct the project. In the event the Applicant obtains additional funding for future phases, maintaining the permitted floor area as written could allow for the

construction of additional dwelling units.

CONDITIONS 15 – 19

No proposed changes to Conditions 15 – 19.

CONDITION NO. 20

20. **Transparent Elements.** Along street-facing Juanita Avenue, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 95 square feet on the northwest building and at least 292 square feet of the southwest building. Along Madison Avenue, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 244 square feet of the southeast building and at least 332 square feet of the Northeast building. Along the north side of the project's paseo at least 928 square feet of the Northwest building shall have the ground floor façade constructed with transparent building materials. Along the south side of the paseo, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 727 square feet of the Southeast building, at least 346 square feet of the Southwest-B building and at least 214 square feet of the Southwest-A building.

Condition No. 20 Redline

20. **Transparent Elements.** Along street-facing Juanita Avenue, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 95 square feet on the northwest building and at least ~~180~~ **292** square feet of the southwest building. Along Madison Avenue, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least ~~244~~ **148** square feet of the southeast building and at least ~~332~~ **318** square feet of the Northeast building. Along the north side of the project's paseo at least ~~244~~ **928** square feet of the Northwest building shall have the ground floor façade constructed with transparent building materials. Along the south side of the paseo, the ground floor façade of the following buildings shall be constructed with transparent building materials: ~~at least 727 square feet of the Southeast building,~~ at least ~~346~~ **163** square feet of the Southwest-B building and at least ~~214~~ **120** square feet of the Southwest-A building.

Condition No. 20 Clean

20 **Transparent Elements.** Along street-facing Juanita Avenue, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 95 square feet on the northwest building and at least 180 square feet of the southwest building. Along Madison Avenue, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 148 square feet of the southeast building and at least 318 square feet of the Northeast building. Along the north side of the project's paseo at least 244 square feet of the Northwest building shall have the ground floor façade constructed with transparent building materials. Along the south side of the paseo, the ground floor façade of the following buildings shall be constructed with transparent building materials: at least 163 square feet of the Southwest-B building and at least 120 square feet of the Southwest-A building.

Condition No. 20 Justification

The Development Standards and Design Guidelines for Subarea D.2, pursuant to Ordinance No. 186,735, only requires a minimum of 25% of that portion of the exterior street-facing walls which

are between 2 feet to 8 feet above the sidewalk grade shall be comprised of transparent (untinted, unfrosted, non-reflective) windows or openings, exclusive of areas for walkways, driveways, paseos, and plazas. The proposed design is consistent with this requirement.

The Condition, as written, reflected the Project as originally designed in the design drawings. The Applicant is currently working on construction drawings. As the architectural drawings have been refined, the building footprints have been adjusted and as a result, the ground floor dimensions of the northwest building have changed. However, there are no SNAP requirements for non-street facing ground floor frontages, so while the northwest building paseo-oriented transparency has been reduced, it is still consistent with all SNAP requirements.

CONDITION NO. 22

22. **Street Trees.** Prior to the issuance of a building permit, the Applicant shall obtain a Class “A” or “B” Permit guaranteeing at least one shade-tree be provided along the public right- of-way for every 30 feet of project street-frontage resulting in (six (6) trees along Oakwood Avenue, seven (7) trees along Madison Avenue, and seven (7) trees along Juanita Avenue). Shade trees shall be maintained via an automated watering system and shall be kept in a healthy state. The number of street trees may be diminished only to ensure compliance with Bureau of Engineering, Building and Safety or Department of Transportation requirements and where possible, omitted trees should be relocated elsewhere in the project area.

Condition No. 22 Redline

22. **Street Trees.** Prior to the issuance of a building permit for a phase, the Applicant shall obtain a Class “A” or “B” Permit guaranteeing at least one shade-tree be provided along the public right- of-way for every 30 feet of project street-frontage resulting in (six (6) trees along Oakwood Avenue during Phase II, seven (7) trees along Madison Avenue during Phase III, and seven (7) trees along Juanita Avenue during Phase I). Shade trees shall be maintained via an automated watering system and shall be kept in a healthy state. The number of street trees may be diminished only to ensure compliance with Bureau of Engineering, Building and Safety or Department of Transportation requirements and where possible, omitted trees should be relocated elsewhere in the project area.

Condition No. 22 Clean

22. **Street Trees.** Prior to the issuance of a building permit for a phase, the Applicant shall obtain a Class “A” or “B” Permit guaranteeing at least one shade-tree be provided along the public right- of-way for every 30 feet of project street-frontage resulting in (six (6) trees along Oakwood Avenue during Phase II, seven (7) trees along Madison Avenue during Phase III, and seven (7) trees along Juanita Avenue during Phase I). Shade trees shall be maintained via an automated watering system and shall be kept in a healthy state. The number of street trees may be diminished only to ensure compliance with Bureau of Engineering, Building and Safety or Department of Transportation requirements and where possible, omitted trees should be relocated elsewhere in the project area.

Condition No. 22 Justification

This Condition, as originally written, did not provide for phasing of the Project. Permits for streetscape improvements should be acquired at the time improvements are proposed along those frontages. By including the language “for a phase,” the Condition applies to the streetscape

in front of a building as opposed to the entire Project Site. Additionally, the revised condition breaks down number of trees by phase instead of as overall numbers.

CONDITION NO. 23

No proposed modifications to Condition No. 23.

CONDITION NO. 24

24. **Bike Racks.** Prior to the issuance of a building permit, the Applicant shall obtain a Class “A” or “B” Permit guaranteeing installation of a minimum of one bike rack for every 50 feet of project street frontage with four (4) racks along Juanita Avenue, four (4) racks along Madison Avenue and four (4) along Oakwood Avenue for a total of 12 bicycle racks and 24 bicycle parking spaces located within the public right-of-way in accordance with Exhibit “A”.

Condition No. 24 Redline

24. **Bike Racks.** Prior to the issuance of a building permit for a phase, the Applicant shall obtain a Class “A” or “B” Permit or revocable permit guaranteeing installation of a minimum of one bike rack for every 50 feet of a project phase’s street frontage ~~with four (4) racks along Juanita Avenue, four (4) racks along Madison Avenue and four (4) along Oakwood Avenue~~ for a total minimum of 12 bicycle racks and 24 bicycle parking spaces located within the public right-of-way in accordance with Exhibit “A” and as described below.

Phase I: Four (4) racks along Juanita Avenue.

Phase II: Four (4) racks along Oakwood Avenue.

Phase III: Six (6) racks along Madison Avenue.

Condition No. 24 Clean

24. **Bike Racks.** Prior to the issuance of a building permit for a phase, the Applicant shall obtain a Class “A” or “B” Permit or revocable permit guaranteeing installation of a minimum of one bike rack for every 50 feet of a phase’s street frontage for a minimum of 12 bicycle racks and 24 bicycle parking spaces located within the public right-of-way in accordance with Exhibit “A”.

Phase I: Four (4) racks along Juanita Avenue.

Phase II: Four (4) racks along Oakwood Avenue.

Phase III: Six (6) racks along Madison Avenue.

Condition No. 24 Justification

This Condition, as originally written, did not provide for phasing of the Project since the permits for streetscape improvements should be acquired at the time improvements are proposed along a frontage. By including the language “for a building,” the Condition can apply to the building frontage as opposed to the entire Project Site. The condition also specifies that 12 bike racks will still be installed and the proposed modification still allows for 12 bike racks to be installed.

CONDITION NO. 25

25. **Trash Receptacles.** The applicant shall provide a minimum of one trash receptacle for every 100 feet of project street frontage, that is two (2) receptacles along Juanita Avenue, three (3) receptacles along Madison Avenue, two (2) along Oakwood Avenue, located within the public right-of-way. Trash receptacles shall be maintained and regularly emptied by the property owner.

Condition No. 25 Redline

25. **Trash Receptacles.** The applicant shall provide a minimum of one trash receptacle for every 100 feet of project street frontage, ~~that is two (2) receptacles along Juanita Avenue, three (3) receptacles along Madison Avenue, two (2) along Oakwood Avenue, located within the public right-of-way.~~ Trash receptacles shall be maintained and regularly emptied by the property owner. Trash receptacles shall be provided by phase as follows:

Phase I: Two (2) receptacles along Juanita Avenue.

Phase II: Two (2) receptacles along Oakwood Avenue.

Phase III: Three (3) receptacles along Madison Avenue.

Condition No. 25 Clean

25. **Trash Receptacles.** The applicant shall provide a minimum of one trash receptacle for every 100 feet of project street frontage. Trash receptacles shall be maintained and regularly emptied by the property owner. Trash receptacles shall be provided by phase as follows:

Phase I: Two (2) receptacles along Juanita Avenue.

Phase II: Two (2) receptacles along Oakwood Avenue.

Phase III: Three (3) receptacles along Madison Avenue.

Condition No. 25 Justification

This revision allows for the phased development of the site.

CONDITION NO. 26

26. **Public Benches.** The applicant shall provide one public bench for every 250 feet of project street frontage (one (1) bench along Juanita Avenue, one (1) bench along Madison Avenue, and one (1) bench along Oakwood Avenue) within the public right-of-way.

Condition No. 25 Redline

Public Benches. The applicant shall provide one public bench for every 250 feet of project street frontage ~~(one (1) bench along Juanita Avenue, one (1) bench along Madison Avenue, and one (1) bench along Oakwood Avenue)~~ within the public right-of-way. One (1) bench shall be provided during Phase I along Juanita Avenue, one (1) bench shall be provided during Phase II along Oakwood Avenue and one (1) bench shall be provided during Phase II along Madison Avenue.

Condition No. 26 Clean

Public Benches. The applicant shall provide one public bench for every 250 feet of project street frontage within the public right-of-way. One (1) bench shall be provided during Phase I along Juanita Avenue, one (1) bench shall be provided during Phase II along Oakwood Avenue and one (1) bench shall be provided during Phase II along Madison Avenue.

Condition No. 26 Justification

This revision allows for the phased development of the site.

CONDITIONS 27 – 34

No proposed changes to conditions no. 27 – 34.

CONDITION NO. 35

35. **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.

Condition No. 35. Redline

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

Condition No. 35. Clean.

35. **Noise.** Any dwelling unit exterior wall that includes windows and doors and has a line of sight to a public street or alley shall be constructed to provide a Sound Transmission Class (STC) of 50 or greater, as defined in the Uniform Building Code Standard No. 35-1, 1979 edition, or latest edition. The Applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

Condition No. 35. Justification

The modification is required in construct the project. As written the Condition focuses the sound transmission requirement and does not allow for the acoustic report provision outlined in the SNAP.

The proposed modification clarifies that the STC 50 rating is only applied to the walls and not to the windows and doors, as intended by the 1979 Uniform Building Code. Standard No. 35-1 of the 1979 Uniform Building Code states “All such separating walls and floor-ceiling assemblies shall provide an airborne sound insulation equal to that required to meet a Sound Transmission

Class (STC) of 50 (45 if field tested) as defined in the U.B.C. Standard 35-1.” Thus, it is clear the STC 50 rating should not apply to windows.

It is extremely difficult and expensive to find a window that meets the standard imposed by the Condition. Most standard dual-insulating glass options have STC ratings in the 28 - 32 range. For example, Milgard Windows, one of the largest window suppliers in the country, makes windows with a typical STC rating for single pane windows at 18-20 while a double glazed window is 28-32. The Milgard Quiet Line Series, advertised as “engineered for superior sound control,” only achieves an STC rating of up to 48.¹

Quiet Mark, an independent global certification program that uses scientific testing to identify the quietest products in multiple categories spanning, awarded the Pella Lifestyle Series Sound Package the Quiet Mark Certification. Pella is the only window manufacturer in the US to be awarded this certification. The Pella Lifestyle Series Sound Control Package has an STC rating between 25 and 37.² As evidenced by both Pella and Milgard, STC window ratings of 50 are not commonly produced. In order to achieve a window with an STC of 50, a specialty acoustical window contractor must be engaged.

Regardless, the Applicant requests the opportunity to submit an acoustic report to demonstrate that the interior of the unit meets the required noise standard for Phase I, and likely for both Phase II and Phase III.

Additionally, the proposed modification includes the option provided in the SNAP to mitigate interior noise levels below a CNEL of 45 dBA, which is the standard unit of sound analyzed in a noise study. CNEL analyzes the average sound over a time period, as opposed to an absolute sound value.

CONDITIONS 36 – 38

No proposed modifications.

CONDITION NO. 39

39. **Building Materials.** The project shall provide building materials/elements as depicted in Exhibit A that includes but is not limited to the following: window walls, composite siding, fiber cement siding, plaster materials, windows, tile, and decorative paving. The project shall provide 5,700 square feet of roof area for solar panels.

Condition No. 39 Redline

39. **Building Materials.** The project shall provide building materials/elements as depicted in Exhibit A that includes but is not limited to the following: window walls, composite siding, fiber cement siding, plaster materials, windows, ~~tile~~, and decorative paving. The project shall ~~provide 5,700 square feet of roof area for~~ provide roof area for solar panels consistent with the California Title 24 Energy Code, Section 9.3.1 which define the Solar Zone Minimum Area and Exceptions.

Condition No. 39 Clean

¹ <https://www.milgard.com/professionals/quiet-line-series-v950>

² <https://www.pella.com/performance/sound-resistance/>

Building Materials. The project shall provide building materials/elements as depicted in Exhibit A that includes but is not limited to the following: window walls, composite siding, fiber cement siding, plaster materials, windows, and decorative paving. The project shall provide roof area for solar panels consistent with the California Title 24 Energy Code, Section 9.3.1 regarding the Solar Zone Minimum Area and Exceptions.

Condition No. 39 Justification

The Applicant will design an environmentally sustainable project. However, the Applicant cannot commit to a minimum square footage of solar. Instead, the Applicant can commit to the requirements of Title 24. Additionally, no tile is included in the Project so this material is deleted.

CONDITIONS NO. 40 – 48

No modifications proposed

**CONSISTENCY FINDINGS FOR SNAP SUBAREA D.2 AS ADOPTED
BY ORDINANCE NO. 186,735**

The Project, as modified, is consistent with the requirements and development standards outlined in SNAP, as detailed below:

Section 10.2.A. Use. *The use and area regulations of Section 12.17,1 of the Code (CM Zone) shall apply to all lots in Subarea D.2, except that residential uses are permitted provided the following requirements are met and the project meets the definition of a Qualified Permanent Supportive Housing Project. No other residential uses are permitted including hotel, motel and apartment hotel.*

The Project meets all criteria as a Qualified Permanent Supportive Housing project. See sheet G001.

Section 10.2.B. Supportive Services. *Applicants shall provide documentation describing the supportive services that will be provided on-site and off-site. Prior to any approval of a Qualified Permanent Supportive Housing Project, the applicant shall submit information demonstrating that supportive services will be provided to residents of the Project. The applicant shall indicate the name of the entity or entities that will provide the supportive services, the Local Public Agency funding source(s) for those services, and proposed staffing levels. If a preliminary funding commitment is needed, the applicant shall also submit a signed letter of intent from the Local Public Agency verifying that it is providing a preliminary funding commitment for the supportive services. If no funding commitment is needed, the applicant shall demonstrate that the entity or entities that will provide the supportive services are service providers prequalified by a Local Public Agency.*

The memorandum of understanding from the Service Provider high lights that services will include intensive case management, benefits counseling/advocacy, mental health, physical health and other related services. The applicant has also provided a service plan for which funding will come from the Local Public Agency (Measure H). People Concern will be the Service Provider. The project will allocate at least 3% of the total floor rea to supportive services. See sheet A110.

Section 10.2.C. Affordable Housing Covenant. *Projects shall record a covenant acceptable to HCIDLA that reserves and maintains the total number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy.*

The project will record an Affordable Housing Covenant with HCIDLA to set aside 5% of its units at Extremely Low income, 11% set aside at Very Low Income at HCD rent levels and the remaining units will be set aside as Lower Income Households at HUD rent levels for a period of 55 years, excluding 5 unrestricted manager's units.

Section 10.2.D. Housing Replacement. *Projects shall meet any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), or as thereafter amended, as verified by HCIDLA, and all applicable covenant and monitoring fees in Section 19.14 of the Code shall be paid by the applicant prior to the issuance of any building permit.*

The project has been conditioned to provide the Replacement Housing pursuant to the AB 2556

letter dated November 14, 2019 from HCIDLA which requires the replacement of three (3) units.

Section 10.2.E.1. Location Requirement. *The Qualified Permanent Supportive Housing Project shall be located within a high-quality transit area for the planning horizon year of the current Regional Transportation Plan/Sustainable Communities Strategy as adopted by the Southern California Association of Governments.*

The Qualified Permanent Supportive Housing Project is within a High Quality transit Area.

Section 10.2.E.2. Dwelling Unit Requirement *Each dwelling unit shall have a private bathroom and cooking facilities containing, at minimum, a sink, refrigerator, counter space, and a hotplate or microwave.*

All Dwelling Units or Guest Rooms will have private bathrooms and cooking facilities. See sheet A110-A117.

Section 10.2.E.3.b On-site Supportive Services Requirement. *For Qualified Permanent Supportive Housing Projects with greater than 20 dwelling units, a minimum of 3% of the total residential floor area shall be dedicated for on-site supportive services provided solely to Project residents, including but not limited to community rooms, case management offices, computer rooms, and/or a community kitchen.*

The Project allocates at least 3% of the total floor area per phase to onsite supportive services. See sheet G020.

Section 10.2.E.4. Massing. *Buildings more than 200 feet in length along any exterior street-facing building facade shall include a design element that provides visual relief every 100 feet. The design element shall either setback from or step forward from the face of the building by at least a depth of 12 inches and shall be a width of no less than 5 percent of the building face (ex: 5 percent of 100' = 5') and shall extend up the face of the building to at least 50 percent of the facade height.*

No building exceeds 200 feet in length along any exterior street.

Section 10.2.E.5. At-Grade Parking. *No at-grade parking space shall be located within the front yard. Loading areas and off-street parking facilities containing three or more spaces shall be effectively screened from abutting streets and lots. The screening shall not obstruct the view of the driver entering or leaving the loading area or parking facility, or the view from the street of entrances and exits to a loading area or parking facility. The screening shall consist of one or more of the following:*

- a. A strip at least 5 feet in width of densely planted shrubs or trees that are at least 2 feet high at the time of planting and are of a type 7 that may be expected to form, within three years after time of planting, a continuous, unbroken, year round visual screen; or*
- b. A wall, barrier, or fence of uniform appearance. Such wall, barrier, or fence may be opaque or perforated, provided that not more than 50 percent of the face is open. The wall, barrier or fence shall be between 4 and 6 feet in height.*

No at grade parking will be located within a front yard. Phase I includes the improvement of a surface parking lot that will be screened. See sheet A000 and landscape drawings.

Section 10.2.F. Density. *Qualified Permanent Supportive Housing Projects shall be permitted unlimited density.*

The Project proposes 387 dwelling units.

Section 10.2.G. Floor Area. *Qualified Permanent Supportive Housing Projects shall not exceed a maximum Floor Area Ratio of 3:1. Areas designated exclusively for Supportive Services uses or common areas accessible to all residents, including those for accessory residential or Supportive Services uses, shall not be considered floor area of the building for purposes of calculating the total allowable Floor Area. These areas include, but are not limited to, corridors, community rooms, lobbies, mail rooms, interior open space. The Floor Area shall be measured to the centerline of wall partitions between public and non-public areas.*

The Project will utilize the floor area definition outlined in the SNAP Subarea D.2 and not exceed an FAR of 3 to 1.

Section 10.2.H. Usable Open Space. *Notwithstanding any provisions of Section 12.21 G of the Code to the contrary, Qualified Permanent Supportive Housing Project containing two or more Dwelling Units or Guest Rooms shall contain usable open space in accordance with the standards of Section 12.21 G.2 of the Code, with the following exceptions:*

- a. **Above Grade.** *Up to 75% of the common or private open space, regardless of the underlying zone, may be located above the grade level or first habitable room level.*
- b. **Roof Decks.** *Roof Decks, regardless of the underlying zone, may be used in their entirety as common or private open space, excluding that portion of the roof within 20 feet of the roof perimeter.*

See sheet G021 for open space calculations. Please note, not all buildings have the same nomenclature with respect to grade level due to grade changes on the site. However, the Project will be consistent with this requirement.

Section 10.2.I.1. Residential Parking Requirements.

- a. *No parking spaces shall be required for Dwelling Units or Guest Rooms restricted to the Target Population of a Qualified Permanent Supportive Housing Project.*
- b. *For a Qualified Permanent Supportive Housing Project located within one-half (1/2) mile of a Transit Stop, no more than one-half (1/2) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population. Otherwise, no more than one (1) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population.*
- c. *Notwithstanding the contrary provisions of Section 12.21 A.4 of the Code and*

regardless of the underlying zone, the following parking standards shall apply to all Qualified Permanent Supportive Housing Projects: One (1) parking space for every 20 Dwelling Unit or Guest Rooms shall be provided for the purpose of accommodating guests, Supportive Services, case management and managers' units. Up to 40% of the total required parking spaces may be provided as compact stalls.

The Project will utilize the Subarea D.2 parking requirements in lieu of the LAMC Section 12.21.4.A parking requirements. With all but one dwelling unit per building restricted for the target population, parking will only be required for managers' units/case management at 1 parking space for every 20 dwelling units.

Phase I will be required to provide 9 parking spaces and 9 parking spaces will be provided in a surface parking lot. Phase II will be required to provide 8 parking spaces and 14 parking spaces are proposed on the ground floor of the Northeast Building (Locke). Phase III will be required to provide 4 parking spaces and 7 parking spaces are proposed.

Section 10.2.1.3.a. Bicycle Parking Requirements. *For Projects with two or more Dwelling Units or Guest Rooms, off-street parking spaces for bicycles shall be provided at a ratio of one-half parking space per Dwelling Unit or Guest Room.*

Each phase will provide off-street bicycle parking commensurate with the amount of housing provided at a ratio of ½ parking space per Dwelling Unit or Guest Room. See sheet G001.