

## FINDINGS OF FACT (CEQA)

**(As adopted by the Planning and Land Use Management Committee on January 17, 2023.)**

DETERMINED based on the whole of the administrative record, that the Project is not exempt from CEQA pursuant to CEQA Guidelines, Section 15332, Class 32 (Infill Development Projects), and there is substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

The project is a classic dormitory-style housing. The applicant portrays this project as a homeownership opportunity, but it is very far from it. Several units are over 10 bedrooms and 10 bathrooms. The layout of the building as shown on plans submitted to the Planning Department with the location of the kitchen and rooms off the stairwells on each floor is indicative that this is a dormitory and not 10 single dwelling homes. This dormitory ought to be, but was not, studied and analyzed as a student housing dormitory with over 90 units.

This project is inconsistent with the Community Plan Implementation Overlay Zone and the community plan because it is out of proportion when analyzed in its proper context. If analyzed appropriately, this project will be above the threshold of traffic noise and air quality.

When it comes to this project, the Class 32 Categorical Exemption is deficient in that the first requirement that the project be “consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations” did not include an adequate consistency analysis.

There is substantial evidence in the administrative record to support the Appellant’s allegations that the City has erred in its judgment for purposes of CEQA and the use of the Class 32 Categorical Exemption that the Project is consistent with the applicable zoning regulations. Therefore, the CEQA is insufficient because the description of the project is wholly inaccurate previously stated. As a result, this tract map cannot be approved because the environmental analysis and the categorical exemption is insufficient. Therefore, we want to grant the appeal. If the applicant submits a project with an accurate and updated project description, then the department of planning can properly evaluate it.

Greater Page Temple has reached out to our office. Their congregation is against this project as they represent one of the most important historical buildings in West Adams. The CPIO also has a subarea that protects the historical character of the homes immediately south of the building known as the Victor Hall Tract and that has not been properly studied.

In addition, the City has failed to analyze the cumulative impacts of the proliferation of student housing in the area, and the City has recognized the negative impacts of multi-habitable room projects in the adjacent area through the establishment of the Neighborhood Stabilization Ordinance. In addition, as stated above, the analysis of cumulative impacts related to air quality, construction noise and construction related transportation is not adequate to support the determination in the narrative supporting the Class 32 exemption failure to analyze the

surrounding student housing projects. The addresses below are adjacent student housing projects:

Address	Case Number
243 W Adams Boulevard	296 apartments
505 W 31st Street	73 apartments
2595 S Hoover Street	46 townhomes
2321 S Flower Street	280 apartments
2813 S Flower Street	47 hotel rooms
1069 W Exposition Blvd	52 apartments
1265 W Exposition Blvd	108 apartments
1421 W Adams Boulevard	45 apartments
1840 W Adams Boulevard	10 SL townhomes