

**Exhibit D – Status of Project Review Letter dated January 6,
2023 (includes Affordable Housing Referral Form No. PAR-
2022-5834-AHRF)**

CITY PLANNING COMMISSION

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January 6, 2023

Transmitted via email

Applicant/Owner

Janet Jha
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Representative

Akhilesh Jha
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Case Numbers: CPC-2022-8993-GPA-ZC-HD-K-
BL-ZV-ZAA-WDI-VHCA

Application Type: General Plan Amendment,
Zone Change, Height District Change, K District
Removal, Building Line Removal, Zone Variance,
Zoning Administrator Adjustment, Waiver of
Dedication and Improvements, Vesting Housing
Crisis Act

CEQA: ENV-2022-8994-EAF

Case Numbers: CPC-2022-9268-DB-HCA and
ENV-2022-9270-EAF

Application Type: Density Bonus, Housing Crisis
Act

CEQA: ENV-2022-9270-EAF

Location: 13916 W. Polk Street

Plan Area: Sylmar

Neighborhood Council: Sylmar

Council District: 7 - Rodriguez

Status of Project Review

The above referenced cases, filed on December 9, 2022, associated with plans dated December 21, 2022, were submitted to the Department of City Planning Development Services Center and forwarded to the Valley Project Planning Division for review. I am your assigned Project Planner. The application you have submitted is not complete. The application also does not comply with objective zoning standards, which are described in detail below.

Your application materials indicate that you believe the proper entitlement path for your project is Density Bonus pursuant to the Housing Crisis Act, pursuant to California Government Code Section 65915 and Los Angeles Municipal Code (LAMC) Section 12.22 A.25. The Department's position is that the proper entitlement path is a General Plan Amendment, Zone Change, Height District Change, K District Removal, Building Line Removal, Zone Variance, Zoning Administrator Adjustment, and Waiver of Dedication and Improvement pursuant to the Vesting Housing Crisis Act, all of which are codified in the Los Angeles City Charter Section 558 and the Los Angeles Municipal Code and are subject to the findings under Government Code Section 65589.5(d).

While your application materials indicate that you are requesting project approval under Government Code Section 65589.5(d), that section does not specify the entitlement process. We are now confirming that Density Bonus subject to the Housing Crisis Act are not the proper entitlement process. This communication is not a disapproval of the project. Instead, this communication serves to identify the process for which the project is be reviewed. In the course of reviewing and processing your case, the Department requires that you clarify, amplify, correct, or otherwise supplement the information provided for in the application in accordance with Government Code Section 65944 of the California Government Code including submittal of an application for Case No. CPC-2022-8993-GPA-ZC-HD-K-BL-ZV-ZAA-WDI-VHCA and ENV-2022-8994-EAF. The Department also requires various documents related to CEQA and is not constrained in requesting information for the purposes of CEQA analysis.

The Department's position is that the proper entitlement path is a General Plan Amendment, Zone Change, Height District Change, K District Removal, Building Line Removal, Zone Variance, Zoning Administrator Adjustment, and Waiver of Dedication and Improvement pursuant to the Vesting Housing Crisis Act and has provided a correction list for those entitlements in this correspondence. In addition, the Department also includes in this correspondence a Corrections list for the entitlement path that you have filed, CPC-2022-9268-DB-HCA, and that list of items is also contained within this letter under that separate case number heading.

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
For Case No. CPC-2022-8993-GPA-ZC-HD-K-BL-ZV-ZAA-WDI-VHCA				
1	Payment of filing fees pursuant to Article 9 of the LAMC	You have not paid fees for this entitlement case. See Department of City Planning Filing Instructions Form No. CP-7810 City Planning Application Filing Instructions.pdf (lacity.org) • Required payment of filing fees - Invoice No. 84895 • As of August 5, 2020, invoices can be paid online by credit card or e-check.		
2	Department of City Planning Application (Form No. CP-7771.1)	An application was provided but the application needs to be amplified, corrected, clarified and supplemented as indicated. See Department of City Planning Filing Instructions Form No. CP-7810 City Planning Application Filing Instructions.pdf (lacity.org) • Project description - The project description must include all aspects of the request, including but not limited to, demolition of any existing		

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		structures, new construction, proposed use, floor area, height, parking. The description must include all phases and plans for future expansion and any removal of on- and off-site trees. As currently written, the project description lists incorrect entitlements and needs corrections. • According to the Project Description provided, the project is for the development of 45 residential units...9 will be rented to low income families. • Will there be any removal of on- and/or off-site trees? • Will an on-site property manager unit be provided pursuant to California Code of Regulations Title 25 Section 42? If so, state in project description. • Clarify Actions Requested - Actions requested needs to be amplified, corrected, clarified and supplemented including the authorizing LAMC Section and the LAMC Section from which relief is requested; • Action requested narrative needs to be amplified, corrected, clarified and supplemented to identify the correct type of entitlement requested (e.g., General Plan Amendment pursuant to LAMC Sections 11.5.6 and 11.5.11 and City Charter Section 555; Zone Change pursuant to LAMC Sections 11.5.11 and 12.32 F; Height District Change pursuant to LAMC Sections 11.5.11 and 12.32 F; K District Removal pursuant to LAMC Section 12.32 S or 12.24 X.5; Building Line Removal, Zone Variance, Zoning Administrator Adjustment pursuant to LAMC Section 12.28; Waiver of Dedication and Improvement pursuant to LAMC Section 12.37 I).		

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		Additionally, describe the details of the request by identifying the correct LAMC requirement and/or deviation requested. The current Actions requested document lists the entitlements requested as Density bonus only which shall be corrected as described above. • Actions requested must be amplified, corrected, clarified and supplemented to show compliance with LAMC Sections 11.5.6 and 11.5.11 (Measure JJJ) which applies to applications for 10 or more dwelling units involving a General Plan Amendment, Zone Change or Height District Change that results in increased allowable residential floor area, density or height.		
3	Affordable Housing Referral Form (Form No. CP-4043)	• The following need to be amplified, corrected, clarified, and supplemented as indicated below as well as indicated on the signed Affordable Housing Referral Form. Planners Renata Dragland and Rina Lara provided corrections on the Affordable Housing Referral Form as well as in attachments. You have submitted these documents but not made the corrections as shown and requested. You are required to make these corrections. These corrections have been included as an attachment to this letter. • Once the form has been corrected, it shall be reviewed and signed by LACP DSC Housing Services Unit (HSU) Staff. Any modifications to the content(s) of this form after its authorization by HSU Staff is prohibited. LACP reserves the right to require an updated Referral Form for the project if more than 180 days have transpired since the referral date, or as necessary, to reflect project modifications, policy changes, bus route changes, bus		

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		schedule changes, and/or amendments to the Los Angeles Municipal Code (LAMC), local laws, and State laws. • The applicant's Affordable Housing Referral Form Detailed Description of the Proposed Project (p. 3) is for the development of 40 residential units for rent with 8 units to be rented to low income families. This description is inconsistent with the Project Description provided on pages 1 and 2 of the Department of City Planning Application Form which states the development of 45 residential units with 9 units rented to low income families. You shall make these documents consistent. • Update parking for consistency with Affordable Housing Referral Form and Department of City Planning Application Form. • See link: Affordable Housing Referral Form.pdf (lacity.org)		
4	Preliminary Zoning Assessment Referral (CP-4064)	• This form shall be amplified, corrected, clarified, and supplemented to correct inconsistencies with unit numbers (form states 40 units, but main application states 45), parking numbers (form states 40 parking spaces but other project narrative documents state 46 spaces). Section I shall be completed by the Applicant. Section II is completed by the Preliminary Application and Review Program (PARP) Unit. If required by Section II, Section III shall be completed along with stamped and signed project plans by LADBS Staff at the conclusion of a zoning Plan Check. • This form is to serve as an inter-agency referral for City Planning applications associated with a		

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		Housing Development Project. As a part of a City Planning application, this completed form shall be accompanied by architectural plans stamped and signed by DBS Plan Check staff following the completion of a zoning Plan Check. You have not submitted architectural plans for the DBS Plan Check Staff Review. You shall submit this. • Completion of Section II by DCP Staff is required and has not been provided. • Completion of Section III to be completed by DBS Plan Check Staff is required and has not been provided. • Plans stamped by DBS Plan Check Staff is required and has not been provided. • Section 5 of the form shall be amplified, corrected, clarified, and supplemented to correctly identify the requests. • For assistance, contact planning.parp@lacity.org. • See link for form and additional instructions: Preliminary Zoning Assessment Referral Form.pdf (lacity.org)		
5	Tree Report required	• According to Google Maps street view, trees appear to potentially be in the public right-of-way but the Tree Disclosure Statement contradicts this. Tree Disclosure Statement shall be supplemented to confirm and correctly identify trees in the public right of way, if any. • See Tree Report Template (CP-4068) linked here: Tree Report Template (lacity.org)		
6	Citywide Design Guidelines Compliance Review (CP-4056)	• This is required for proposed construction of 5 or more dwelling units pursuant to the City Planning Application Filing instructions (Form CP- 7810). The form was provided		

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		but needs to be amplified, corrected, clarified and supplemented as indicated: ○ Revise form to show compliance with plans; specifically, number of parking spaces, clarify size and location of balconies. Clearly illustrate pedestrian walkways on plans. Plans should clearly illustrate ingress/egress on Polk and Lyle Streets to show connectivity between the two streets. How does the driveway design protect the pedestrian experience? Guideline 3 repeats Guideline 2; neither the guidelines or plans show active engagement with the public street or public space. Neither the guidelines or plans show how human scale is maintained. Regarding Guideline 4, how does the project recognize and respect the equine district? Are there horse trails or horse keeping uses that will be impacted? What is the height and square footage of abutting and adjacent properties? Guideline 5 states that the project is divided into multiple fourplexes; clarify the number of fourplexes and/or the configuration of triplexes and fourplexes if applicable. Regarding Guideline 6, the square footage of the recreational amenity should be calculated and applied toward the common open space requirement. If this is not possible, explain why. Show the play area, event room, and conference room on plans. Regarding Guideline 7, how		

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		have design elements been very carefully arranged to protect site users? Regarding Guideline 8, on-site and/or street trees and equine trails are unique natural resources/features. How will mature trees be protected. Discuss any equine uses in the vicinity. Furthermore, the Sylmar Community Plan (adopted June 10, 2015) discusses unique resources such as the semi-rural atmosphere and open space areas. Elaborate on these resources. Regarding Guideline 9, clearly discuss how the site layout, building massing, and building orientation have been chosen to lower energy demand and increase the comfort and well-being of users. For example, are solar panels used? The intent of Guideline 10 is to capture stormwater and promote habitat via green features. How and where will landscaping be provided? How will this guideline be fulfilled while the applicant deviates from landscaping and LID requirements? • See Citywide Design Guidelines Compliance Review Form.pdf (lacity.org) • See CP-4057 linked below for sample: Citywide Design Guidelines SAMPLE.pdf (lacity.org)		
7	Bureau of Engineering (BOE) Planning Case Referral Form (PCRF)	• This form is missing. It is required for new construction of multi-family residential buildings with two or more dwelling units in any zone to establish preliminary right-of-way requirements.		

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		For PCRF form and additional instructions, contact Bureau of Engineering - City of Los Angeles (lacity.org)		
8	Building Permits and Certificates of Occupancy	- Building Permits and Certificates of Occupancy for existing buildings or structures are missing, and these documents are required. - These documents may be obtained from the Los Angeles Department of Building and Safety via the link: Search Online Building Records LADBS		
9	Low Impact Development (LID) Referral Form	- Low Impact Development (LID) Referral Form must be obtained from the Bureau of Sanitation for all projects which add, create, or replace 500 square feet of impervious area. This form has not been provided. Please be advised that the project design may require alterations in order to incorporate storm water mitigation measures and satisfy LID requirements per the City's LID Ordinance. - Contact the Bureau of Sanitation via the link: LA Sanitation (lacitysan.org)		
10	Replacement Unit Determination (RUD) Letter	This letter has not been provided and is required. The Replacement Unit Determination (RUD) Letter must be obtained from LAHD for all Housing Development Projects subject to the Housing Crisis Act or projects using an affordable housing incentive program, such as Density Bonus or TOC, unless the project consists of a single residential unit on a site zoned locally for single-family uses (e.g., A, RA, RE, RS, R1) or is an ADU or JADU that does not remove units. In this instance, the applicant requests a multi-family project and is subject to the HCA. The RUD will determine whether any replacement units are required, their affordability levels, and any applicable occupant protections.		

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		For assistance, please contact lahd-landuse@lacity.org.		
11	Index Map and Color Photographs	This was provided but needs to be amplified, corrected, clarified, and supplemented as indicated: • Provide a map (e.g., Assessor's Map, ZIMAS Map, District Map) with arrows and numbers keyed to the photographs indicating from where each photo was taken and toward which direction. • Provide color photographs taken recently and depicting current conditions of the entire project site and surrounding area. Only one photo was provided from the street view and this is not sufficient. Photos of the project site should show existing structures, trees, shrubs, walls/fences, signage, streets, curb and gutters, and parking areas, as applicable. Photos of the surrounding area should clearly represent the context of the proposed project to the neighborhood. Photographs should be printed, no more than two to a page, captioned as to the content, and keyed to number on an accompanying Index Map.		
12	Plot Plan	See Form CP-7752 for Instructions and Example as linked here: Plot Plan Instructions.pdf (lacity.org) Plot/Site Plan was provided but it is not of sufficient clarity to indicate the nature and extent of the proposed work and to demonstrate conformance with the provisions of all applicable regulations. Applications filed with Plot Plans that do not substantially conform with these instructions, are unclear and illegible. The following need to be amplified, corrected, clarified, and supplemented as indicated:		

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		• The Plot Plan shall include a Summary Table that identifies relevant information to the proposed project and shall be revised. Categories shall include: • Lot area and buildable area; • Square footage of proposed uses based on Floor Area per LAMC Chapter 1 and other applicable Planning and Zoning requirements for area calculations; note that square footage of existing use shown on Sheet G1 is inconsistent with other application materials and a correction is required; • The number of existing, proposed, and demolished or to-be-demolished housing units is required; • Open Space that is required and that is provided; • Landscaping that required and that is provided; • Parking spaces that are required and that are provided, and they shall be indexed to applicable plan sheets; note that number of parking spaces provided is inconsistent with other application materials; a correction required for consistency. • Proposed and maximum allowed heights of all buildings and structures; • Requested entitlement, including any affordable housing incentives where applicable; • Show correct Zoning designation; • Sheet numbers (e.g., G1, G2, A1, A2) are inconsistent with Symbols Legend (e.g., A1.10); • Include site address, legal description including Arb number, and names of abutting streets and public rights-of-way; • The site boundary shall be shown by a heavy-broken line and clearly labeled; • Provide dimensions for all property lines (pre- and post-dedication),		

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		yards, setbacks, building or structure height, building footprints, minimum distances between structures; • Clarify what is meant by “area after removing dedication: 42,805 sf” • Square footage calculations for all notable areas; what is 3,600 sf? • FAR Calculations (proposed and maximum permitted) for entire project site; • Clearly label, identify, and differentiate the following features: existing structures to be demolished and existing structures to remain; existing structures or walls to be demolished shall be shown with dashed or hatched lines; proposed structures to be constructed. • Automobile Parking/Bicycle Parking/Loading: parking areas (including stalls), on-site circulation, and dimensions for driveways and/or access to the site; parking table (number required by the LAMC, number provided); location of residential guest parking stalls; dimension and access driveways for any loading areas. • Sidewalks and Rights-of-Way Easements: dimension all sidewalk widths and show the location of bus stops/shelters, power poles and overhead utility lines, street trees and other infrastructure (i.e., bike racks, utility boxes, tree wells, equine trails) located along the property frontage. • Trees: indicate the location, size, type, and general condition of all protected trees and shrubs, and non-protected trees which measure 8 inches or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground, located on the site and within the public right(s)-of-way. Refer to the Landscape Plan		

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		Instructions for applicable requirements (CP-6730). • Adjacent land uses: show the approximate location, zone, uses, yards/setbacks, height, and footprint of buildings and structures on adjacent properties.		
13	Floor Plan	See Form CP-7751 for Instructions and Example as linked here: Microsoft Word - Floor Plan Instructions.docx (lacity.org) An illegible or inadequate floor plan was submitted and cannot be accepted as it is illegible and is missing information. The following need to be amplified, corrected, clarified, and supplemented as indicated: • Boundaries: Floor Plans shall include the entire building subject to the approval. • Include street address of project. • Include all dimensions for living room, bedroom, dining room, bathroom, balcony, hallway, stairwell. • Area calculations in square feet for living room, bedroom, dining room, balconies. • Clarify garage recreational unit and recreational unit shown on second floor. How will these units be used? • Why are units on the first floor labeled garage units 2 and 3? • Is the project a combination of triplex and fourplex structures?		
14	Elevations	See Form CP-7817 for instructions and examples linked here: Elevation Instructions.pdf (lacity.org) Elevations were provided but they are not of sufficient clarity to indicate the nature and extent of the proposed work and to demonstrate conformance with the provisions of all applicable regulations. Applications filed with Elevations that do not substantially conform with these instructions, are		

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		unclear and illegible. The following need to be amplified, corrected, clarified, and supplemented as indicated: • If the applicant is requesting to deviate from Transitional Height requirements pursuant to LAMC Section 12.21.1 A.10, show distance from adjacent properties and structures. • Elevations shall be consistent with plot and floor plans. • Include site address, legal description including Arb number, and names of abutting streets and public rights-of-way. • Labeling: elevations for all sides of the buildings must be provided and all views and major features must be labeled, including which side of the project is being illustrated (North, South, West and/or East elevations). Currently, labeling is unclear. For example, is "Elevation North of Fourplex" facing Polk Street? • Include stories and dimensions for all heights. • Is maximum building height 60 feet? • Dimension each floor level. • Is this a combination of fourplex and triplex units (per Floor Plan)? If so, provide elevations for both fourplex and triplex. • Show fences, walls, beams, barriers, lighting fixtures, pillars, and gates on all sides. • Show height, width, and depth of balconies. • Specify the approximate albedo or percentage of sunlight reflected by specific building materials and colors. • Indicate the approximate location and height of structures, trees, and existing topography on all adjacent properties for neighborhood context and landscaping. • Color elevations required for all City Planning Commission cases		

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15	Sections	Required for projects with multiple levels per City Planning Application Filing Instructions, Form CP-7810 page 12. None have been provided.		
16	Landscape and Open Space Plans	- No Landscape and Open Space plans were provided. - Landscape and irrigation plans are required for any discretionary application which involves new construction. Show landscaping referenced in Citywide Design Guidelines submitted with applicant materials. Refer to Landscape Plan Instructions (CP-6730): Landscape Plan Instructions.pdf (lacity.org) - Open Space Plan is required for projects proposing six or more dwelling units. Show recreational facilities and balconies. Refer to Landscape Plan Instructions (CP-6730): Landscape Plan Instructions.pdf (lacity.org)		
17	Related Planning Cases	Provide a copy of Ordinance No. 99,113 which established the 37 foot Building Line.		
18	Findings / Specialized Requirements for Zone Change (ZC), Height District Change (HD), Building Line (BL) (CP-7774 zc)	- The process for Zone Change, Height District Change, and Building Line Removal are codified in LAMC Sections 12.32 F and 11.5.11 (Zone Change); Section 12.32 F (Height District Change); and Section 12.32 R (Building Line Removal). - Clarify, amplify, correct, or otherwise supplement the justifications for All Cases, Additional Justification for Building Line Cases. - See instructions and Form CP-7774 zc linked here: Zone Change.pdf (lacity.org)		
19	Zone Variance (CP-7302 zv)	LAMC Section 12.27 authorizes a Zoning Administrator to grant variances from property development standards established by the Code.		

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		- The project deviates from Code requirements for automobile parking; requests all parking spaces to be compact spaces, requests deviation in required back up space; other parking deviations as needed; deviations from bicycle parking requirements; deviations from landscape requirements; deviations from recycling area requirements. - However, no information was provided for a Zone Variance which is required. Provide a detailed justification/explanation of how the proposed project complies with each of the five findings required for each Zone Variance. - See instructions and form CP-7302 zv linked here: Microsoft Word - 7302 zv.docx (lacity.org)		
20	Removal from K District or Zoning Administrator Adjustment	- K District Removal pursuant to LAMC Section 12.32 S requires justification for the removal of the K District. Clarify, amplify, correct, or otherwise supplement the justification currently provided. Justification must address whether adoption of the proposed K District Removal will be in conformity with public necessity, convenience, general welfare and good zoning practice. OR depending on the building design, a Zoning Administrator Adjustment pursuant to LAMC 12.24 X.5 (Dwelling Adjacent to an Equinekeeping Use). See Form CP-7781 zaa linked here: Zoning Administrator Adjustment.pdf (lacity.org)		
21	Zoning Administrator Adjustment (CP-7781)	Pursuant to LAMC Section 12.28, an approval to deviate from yard setbacks, spaces between buildings, and passageway requirements is required but the Specialized Requirements form, CP-7781, has not been provided and it is required.		

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		See Form CP-7781 zaa linked here and provide all required materials and information: Zoning Administrator Adjustment.pdf (lacity.org)		
22	Waiver of Dedication and/or Improvement to the Public Right of Way Process and Supplemental Application Form CP-4047	- LAMC Section 12.37 I authorizes the waiver of street dedications and improvements. - Supplemental Application is required but is currently not provided. See Form CP-4047 linked here: Waiver of Street Dedication and Improvements - Supplemental Application.pdf (lacity.org) - Comply with additional instructions on Form CP-4048 linked here: Waiver of Street Dedication and Improvements - Instructions (lacity.org)		
23	Electronic Copy	No electronic copy was provided and it is required. Provide an electronic copy of all application materials on a USB flash drive. Save each item as an individual pdf.		
For ENV-2022-8994-EAF				
24	Payment of filing fees pursuant to Article 9 of the LAMC	You have not paid fees for this case. See Department of City Planning Filing Instructions Form No. CP-7810 City Planning Application Filing Instructions.pdf (lacity.org) - Payment of filing fees - Invoice No. 84895. - As of August 5, 2020, invoices can be paid online by credit card or e-check.		
25	Environmental Assessment Form Application (CP-1204)	This form was provided but needs to be amplified, corrected, clarified, and supplemented as indicated: - Correct Community Plan Area, page 1; - Section 2.A Existing Conditions, indicate net and gross acres; - Section 2.B Zoning/Land Use shows RD1.5 as the proposed Zoning with a Low Medium II General Plan Land Use Designation. LAMC Section 12.22 A.25 does not provide an entitlement		

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		path for a Zone Change from the current RA-1-K Zone and/or a General Plan Amendment from the current Very Low I Residential land use designation. • Section 2.C, Structures, square footage of existing dwelling unit is inconsistent with the plans; • Complete Section 2.D., Trees – to be completed by applicant; • Complete Section 2.G. Import/Export; • Section 3.B, Recreational Facilities and Open Space: applicant shows one recreational facility, 1968.75 square feet of private open space, and 12 trees, all of which should be shown on plans.		
26	Geology and Soils Approval Letter	This is required for projects within a fault zone -Sierra Madre Fault Zone – San Fernando which your project is located within. This letter has not been provided.		
27	Associated Application	A duplicate copy of the application for the associated entitlement, Case No. CPC-2022-8993-GPA-ZC-HD-K-BL-ZV-ZAA-WDI-VHCA including Plot/Site Plans, Floor Plans, Elevations, Sections, Landscape and Open Space Plans, Color Photos and Index Map, and Tree Report is required and has not been provided.		
28	Electronic Copy	Provide an electronic copy of all application materials on a USB flash drive. Save each item as an individual pdf. This is required but has not been provided.		
For Case No. CPC-2022-9268-DB-HCA				
29	Department of City Planning Application (Form No. CP-7771.1)	See Department of City Planning Filing Instructions Form No. CP-7810 City Planning Application Filing Instructions.pdf (lacity.org) An application was provided but the following need to be amplified, corrected, clarified, and supplemented as indicated:		

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		• Project Description (page 1): The project description must include all aspects of the request, including but not limited to, demolition of any existing structures, new construction, proposed use, floor area, height, parking, and may be provided as an attachment. The description must include all phases and plans for future expansion and any removal of on- and off-site trees. As currently written, the project description lists incorrect entitlements and needs corrections. • According to the Project Description provided, the project is for the development of 45 residential units...9 will be rented to low income families. • Will there be any removal of on- and/or off-site trees? • Will an on-site property manager unit be provided pursuant to California Code of Regulations Title 25 Section 42? If so, state in project description. • Clarify Actions Requested (page 2): Authorizing LAMC Section. Identify the LAMC Section which authorizes your request, or if requesting relief from an LAMC regulation, identify the LAMC Section which permits the relief.		
30	Incentives and Waiver of Development Standards	• LAMC Section 12.22 A.25 permits a maximum of three on-menu incentives and an unlimited number of off-menu incentives and waivers/modification of development standards pursuant to Density Bonus law. Clarify which of these are off-menu incentives, which are waivers of development standards and which are on-menu incentives: ○ FAR		

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		○ No LID ○ No street dedications on Polk and Lyle Streets ○ 46 covered compact parking only ○ 3 stories ○ Building height 40 feet ○ No transitional height ○ 0 foot front yard setback ○ 0 foot rear yard setback ○ 5 foot side yard setbacks ○ No passageway requirement ○ No building line requirement ○ No equinekeeping restrictions (LAMC Section 13.05) ○ Waiver of space between buildings (LAMC Section 12.21 C.2(a)) ○ No bicycle parking requirement ○ No open space requirement ○ No landscaping requirement ○ No recycle area requirement		
31	Declaration Supporting Requested Incentives and Waivers	The following need to be amplified, corrected, clarified, and supplemented as indicated: • FAR: LAMC Section 12.07 C.5 which regulates Maximum Residential Floor Area (RFAR). See LAMC Section 12.03, Definitions, which differentiates between “Floor Area” and “Floor Area, Residential.” Confirm required FAR and RFAR with LADBS. • Provide LID Referral Form, or other documentation from LASAN regarding required LID standard and deviation requested. This is required but it has not been provided in the application. Is applicant requesting to deviate from state/federal regulations? The Referral Form was not provided and no information was provided with any details. This needs to be submitted.		

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		- Specify - what dedications/improvements are required? Specify - what you are requesting to waive? You do not provide this information. In addition, Waivers of Dedication and Improvements shall not be requested as a Density Bonus Incentive / Waiver. Instead, a Waiver of Dedication and Improvement (WDI) per 12.37 must be applied for and fees are required. - Show required parking calculations based on the number of habitable rooms per unit and verify with LADBS. - Height – provide information on roof pitch per LAMC 12.21.1 A.1; confirm number of stories and height with LADBS. - Confirm with LADBS that Transitional Height applies pursuant to LAMC Section 12.21.1 A.10 - Confirm required front yard setback with LADBS pursuant to LAMC Section 12.07 C.1; does prevailing setback apply? - Confirm all yard requirements for a three-story structure with LADBS. - Equine keeping – LAMC Section 13.05 C regulates distance between habitable rooms and equine enclosures. Show the distances between any equine enclosures on neighboring lots and proposed habitable rooms. - Passageway and Space Between Buildings – confirm requirements with LADBS pursuant to LAMC Sections 12.21 C.2(a) and (b). - Bicycle Parking – Confirm requirements with LADBS pursuant to LAMC Section 12.21 A.16; how many long-term and how many short-term spaces are required? - LAMC Section 12.21 G requires common and private open space.		

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		Indicate the area of common and private open space required. Could any of this open space be achieved via the recreation room and balconies? - Request to deviate from landscaping requirements should be made pursuant to LAMC Sections 12.40 – 12.43 and 12.21 G. - Recyclable area requirement – Show how area was calculated and confirm with LADBS.		
32	Updated Affordable Housing Referral Form (Form No. CP-4043)	- The following need to be amplified, corrected, clarified, and supplemented as indicated below as and also please see instructions on the signed Affordable Housing Referral Form. Planners Renata Dragland and Rina Lara provided corrections on the Affordable Housing Referral Form as well as in attachments. You have submitted these documents but not made the corrections as shown and requested. You are required to make these corrections. These corrections have been included as an attachment to this letter. - Once the form has been corrected, it shall be reviewed and signed by LACP DSC Housing Services Unit (HSU) Staff. Any modifications to the content(s) of this form after its authorization by HSU Staff is prohibited. LACP reserves the right to require an updated Referral Form for the project if more than 180 days have transpired since the referral date, or as necessary, to reflect project modifications, policy changes, bus route changes, bus schedule changes, and/or amendments to the Los Angeles Municipal Code (LAMC), local laws, and State laws. - The applicant's Affordable Housing Referral Form Detailed Description of		

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		the Proposed Project (p. 3) is for the development of 40 residential units for rent with 8 units to be rented to low income families. This description is inconsistent with the Project Description provided on pages 1 and 2 of the Department of City Planning Application Form which states the development of 45 residential units with 9 units rented to low income families. You shall make these documents consistent. • Update parking for consistency with Affordable Housing Referral Form and Department of City Planning Application Form. • See link: Affordable Housing Referral Form.pdf (lacity.org)		
33	Preliminary Zoning Assessment Form (CP-4064)	This form shall be amplified, corrected, clarified, and supplemented: • You shall correct inconsistencies with unit numbers (form states 40 units, but main application states 45), parking numbers (form states 40 parking spaces but other project narrative documents state 46 spaces). Section I shall be completed by the Applicant. Section II is completed by the Preliminary Application and Review Program (PARP) Unit. If required by Section II, Section III shall be completed along with stamped and signed project plans by LADBS Staff at the conclusion of a zoning Plan Check. • This form is required because it serves as an inter-agency referral for City Planning applications associated with a Housing Development Project. As a part of a City Planning application, this completed form shall be accompanied by architectural plans stamped and signed by DBS Plan Check staff following the completion of a zoning Plan Check. You have not submitted architectural		

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		plans for the DBS Plan Check Staff Review. You shall submit this. • Completion of Section II by DCP Staff is required and has not been provided. • Completion of Section III to be completed by DBS Plan Check Staff is required and has not been provided. • Plans stamped by DBS Plan Check Staff is required and has not been provided. • Section 5 of the form shall be amplified, corrected, clarified, and supplemented to correctly identify the requests. • For assistance, contact planning.parp@lacity.org. See link for form and additional instructions: Preliminary Zoning Assessment Referral Form.pdf (lacity.org)		
34	Housing Crisis Act Vesting Preliminary Application (CP-4062)	The following need to be amplified, corrected, clarified, and supplemented as indicated: • An updated form is required to maintain vesting status per Page 1, General Information: "Further, any change to the proposed number of dwelling units or the proposed square footage of construction must be verified by PARP Unit staff." • Updated Affordable Housing Referral Form is required. See CP-4062, Section 5, Affordable Housing Incentives, Waivers, Concessions and Parking Reductions, Footnote 6 (page 3) states: "Projects proposing Density Bonus "On-Menu" incentives through a ministerial process or "Off-Menu" incentives, waivers, concessions and parking reductions through a discretionary process must be reviewed by the Los Angeles City Planning Housing Services Unit and obtain a signed Affordable Housing Referral Form prior to filing an application." An updated Affordable		

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		Housing Referral Form is required per comment above.		
35	Tree Report Required	- According to Google Maps street view, trees appear to potentially be in the public right-of-way but the Tree Disclosure Statement contradicts this. Tree Disclosure Statement shall be supplemented to confirm and correctly identify trees in the public right of way, if any. - See Tree Report Template (CP-4068) linked here: Tree Report Template (lacity.org)		
36	Bureau of Engineering (BOE) Planning Case Referral Form (PCRF)	- The form is missing. It is required for new construction of multi-family residential buildings with two or more dwelling units in any zone to establish preliminary right-of-way requirements. - For PCRF form and additional instructions, contact Bureau of Engineering - City of Los Angeles (lacity.org)		
37	Building Permits and Certificates of Occupancy	- Building Permits and Certificates of Occupancy are required for existing buildings and structures and these documents are missing. - These documents may be obtained from the Los Angeles Department of Building and Safety via the link: Search Online Building Records LADBS		
38	Replacement Unit Determination (RUD) Letter	This form is required and has not been submitted. Replacement Unit Determination (RUD) Letter must be obtained from LAHD for all Housing Development Projects subject to the Housing Crisis Act or projects using an affordable housing incentive program, such as Density Bonus or TOC, unless the project consists of a single residential unit on a site zoned locally for single-family uses (e.g., A, RA, RE, RS, R1) or is an ADU or JADU that does not remove units. In this instance, the applicant requests a multi-family project and is subject to the HCA. The RUD form is required.		

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		The RUD will determine whether any replacement units are required, their affordability levels, and any applicable occupant protections. For assistance, please contact lahd-landuse@lacity.org.		
39	Index Map and Color Photographs	This was provided but needs to be amplified, corrected, clarified, and supplemented as indicated: • Provide a map (e.g., Assessor's Map, ZIMAS Map, District Map) with arrows and numbers keyed to the photographs indicating from where each photo was taken and toward which direction – this is required and was not provided. • Provide more color photographs taken recently and depicting current conditions of the entire project site and surrounding area – only one photo taken from the street was provided and this is not sufficient. Photos of the project site should show existing structures, trees, shrubs, walls/fences, signage, streets, curb and gutters, and parking areas, as applicable. Photos of the surrounding area should clearly represent the context of the proposed project to the neighborhood. Photographs should be printed, no more than two to a page, captioned as to the content, and keyed to number on an accompanying Index Map.		
40	Findings	This was provided but needs to be amplified, corrected, clarified, and supplemented as indicated: • Compliance with LAMC Section 12.22 A.25(e)(2) (i) "The façade of any portion of a building that abuts a street shall be articulated with a change of material or with a break in plane so that the façade is not a flat surface." Project plans do not clearly indicate the portion of the building that abuts a street. Narrative references sheet numbers A3.1 through A.3.4 which are not in the plans provided with		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		application materials. As written, the applicant's finding is inadequate. • Compliance with LAMC Section 12.22 A.25(e)(2) (ii) has not been depicted and shall be depicted. This code section states "All buildings must be oriented to the street by providing entrances, windows, architectural features and/or balconies on the front and along any street-facing elevations." The project plans do not clearly indicate the portion of the building that abuts a street and so the Department cannot determine consistency. The narrative references sheet numbers A2.2 to A2.4 which are not in the plans provided with application materials. As written, the applicant's finding is inadequate. • Compliance with LAMC Section 12.22 A.25(g)(2)(c)(i) needs to be supplemented and amplified. The requirement states "The Incentive is not required in order to provide for affordable housing costs..." Applicant states: "As explained previously, the incentives are required to provide affordable housing cost. Without these three additional incentives, the project will be cost-prohibitive and will not be an economically feasible project." Which three additional incentives is the applicant referencing? As written, the applicant's finding is inadequate. • Compliance with LAMC Section 12.22 A.25(g)(2)(c)(ii) must supplemented and amplified. The requirement states "...Inconsistency with the zoning ordinance or general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety." Explain how the project will not have a specific adverse impact upon the RA-1-K Zone and/or the Very Low I Residential land use designation. As written, the applicant's finding is inadequate.		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
41	Plans - Plot/Site Plan	See Form CP-7752 for Instructions and Example as linked here: Plot Plan Instructions.pdf (lacity.org) Plot/Site Plan was provided but it is not of sufficient clarity to indicate the nature and extent of the proposed work and to demonstrate conformance with the provisions of all applicable regulations. Applications filed with Plot Plans that do not substantially conform with these instructions, are unclear and illegible. The following need to be amplified, corrected, clarified, and supplemented as indicated: • The Plot Plan shall include a Summary Table that identifies relevant information to the proposed project. Categories should include: • Lot area and buildable area; • Square footage of proposed uses based on Floor Area per LAMC Chapter 1 and other applicable Planning and Zoning requirements for area calculations; note that square footage of existing use shown on Sheet G1 is inconsistent with other application materials and correction is required; • The number of existing, proposed, and demolished or to-be-demolished housing units; • Open Space required and provided; • Landscaping required and provided; • Parking spaces required and provided, indexed to applicable plan sheets; note that number of parking spaces provided is inconsistent with other application materials. Correction required for consistency. • Proposed and maximum allowed heights of all buildings and structures;		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		• Requested entitlement, including any affordable housing incentives where applicable. • Show correct Zoning designation. • Sheet numbers (e.g., G1, G2, A1, A2) are inconsistent with Symbols Legend (e.g., A1.10). • Include site address, legal description including Arb number, and names of abutting streets and public rights-of-way. • The site boundary shall be shown by a heavy-broken line and clearly labeled. • Provide dimensions for all property lines (pre- and post-dedication), yards, setbacks, building or structure height, building footprints, minimum distances between structures. • Clarify what is meant by “area after removing dedication: 42,805 sf” • Square footage calculations for all notable areas; what is 3,600 sf? • FAR Calculations (proposed and maximum permitted) for entire project site. • Clearly label, identify, and differentiate the following features: existing structures to be demolished and existing structures to remain; existing structures or walls to be demolished shall be shown with dashed or hatched lines; proposed structures to be constructed. • Automobile Parking/Bicycle Parking/Loading: parking areas (including stalls), on-site circulation, and dimensions for driveways and/or access to the site; parking table (number required by the LAMC, number provided); location of residential guest parking stalls; dimension and access driveways for any loading areas. • Sidewalks and Rights-of-Way Easements: dimension all sidewalk widths and show the location of bus stops/shelters, power poles and		

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		overhead utility lines, street trees and other infrastructure (i.e., bike racks, utility boxes, tree wells, equine trails) located along the property frontage. • Trees: indicate the location, size, type, and general condition of all protected trees and shrubs, and non-protected trees which measure 8 inches or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground, located on the site and within the public right(s)-of-way. Refer to the Landscape Plan Instructions for applicable requirements (CP-6730). • Adjacent land uses: show the approximate location, zone, uses, yards/setbacks, height, and footprint of buildings and structures on adjacent properties.		
42	Plans – Floor Plans	See Form CP-7751 for Instructions and Example as linked here: Microsoft Word - Floor Plan Instructions.docx (lacity.org) An illegible or inadequate floor plan was submitted and cannot be accepted as it is illegible and is missing information. The following need to be amplified, corrected, clarified, and supplemented as indicated: • Boundaries: Floor Plans shall include the entire building subject to the approval. • Include street address of project. • Include all dimensions for living room, bedroom, dining room, bathroom, balcony, hallway, stairwell. • Area calculations in square feet for living room, bedroom, dining room, balconies. • Clarify garage recreational unit and recreational unit shown on second floor. How will these units be used? • Why are units on the first floor labeled garage units 2 and 3?		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		Is the project a combination of triplex and fourplex structures?		
43	Plans – Roof Plans	Clarify and dimension hatched area, as this has not been done on the plans.		
44	Plans - Elevations	See Form CP-7817 for instructions and examples linked here: Elevation Instructions.pdf (lacity.org) Elevations were provided but they are not of sufficient clarity to indicate the nature and extent of the proposed work and to demonstrate conformance with the provisions of all applicable regulations. Applications filed with Elevations that do not substantially conform with these instructions, are unclear and illegible. The following need to be amplified, corrected, clarified, and supplemented as indicated: - If the applicant is requesting to deviate from Transitional Height requirements pursuant to LAMC Section 12.21.1 A.10, show distance from adjacent properties and structures. - Elevations shall be consistent with plot and floor plans. - Include site address, legal description including Arb number, and names of abutting streets and public rights-of-way. - Labeling: elevations for all sides of the buildings must be provided and all views and major features must be labeled, including which side of the project is being illustrated (North, South, West and/or East elevations). Currently, labeling is unclear. For example, is “Elevation North of Fourplex” facing Polk Street? - Include stories and dimensions for all heights. - Is maximum building height 60 feet? - Dimension each floor level. - Is this a combination of fourplex and triplex units (per Floor Plan)? If so, provide elevations for both fourplex and triplex.		

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		• Show fences, walls, beams, barriers, lighting fixtures, pillars, and gates on all sides. • Show height, width, and depth of balconies. • Specify the approximate albedo or percentage of sunlight reflected by specific building materials and colors. • Indicate the approximate location and height of structures, trees, and existing topography on all adjacent properties for neighborhood context and landscaping. • Color elevations required for all City Planning Commission cases.		
45	Sections	• This is required for projects with multiple levels per City Planning Application Filing Instructions, Form CP-7810 page 12. None have been provided.		
46	Landscape and Open Space Plans	• Landscape and irrigation plans are required for any discretionary application which involves new construction and this has not been provided. Show landscaping referenced in Citywide Design Guidelines submitted with applicant materials. Refer to Landscape Plan Instructions (CP-6730): Landscape Plan Instructions.pdf (lacity.org) • Open Space Plan is required for projects proposing six or more dwelling units and this has not been provided. Show recreational facilities and balconies. Refer to Landscape Plan Instructions (CP-6730): Landscape Plan Instructions.pdf (lacity.org)		
47	Related Planning Cases	Provide a copy of Ordinance No. 99,113 which established the 37 foot Building Line as this has not been provided.		
48	Density Bonus, Conditional Use, Public Benefit	Provide form CP-3251 linked here:		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
	Project Housing Incentives Findings/Special Requirements Form CP-3251	Public Benefit Project for Affordable Housing.pdf (lacity.org) The following need to be amplified, corrected, clarified, and supplemented as indicated: • Page 1, check all that apply to your entitlement request, which has not been done. • Affordable Housing Referral Form shall be completed by the applicant and reviewed and signed by Development Services Center (DSC) Housing Services Unit (HSU) Staff. The form signed by HSU staff dated 12/12/2022 is for a proposed project to develop 40 residential units with 8 units for low income families. The applicant's Department of City Planning Application is for a proposed project to develop 45 residential units with 9 units for low income families. In addition, this Affordable Housing Referral Form has many corrections which have been noted on the form by City Planning Staff, and which is included in this letter as an attachment. An unsigned Affordable Housing Referral Form was provided which proposes 45 units. However, this form requires corrections as described above. Revise the form to be consistent with all application materials and request review from HSU staff. See link to Affordable Housing Referral Form: Affordable Housing Referral Form.pdf (lacity.org) • Preliminary Zoning Assessment Form (CP-4064). This form shall be amplified, corrected, clarified, and supplemented to correct inconsistencies with unit numbers (form states 40 units, but main application states 45), parking numbers (form states 40 parking spaces but other project narrative		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		documents state 46 spaces). As a part of a City Planning application, this completed form shall be accompanied by architectural plans stamped and signed by DBS Plan Check staff following the completion of a zoning Plan Check. Review of the referral form by City staff is intended to identify and determine compliance with City zoning and land use requirements necessary to achieve the proposed project and to ascertain if any zoning issues or necessary approvals are associated with the project and site that need to be resolved through a discretionary City Planning action. You have not submitted architectural plans for the DBS Plan Review and you shall submit this. Completion of Section II by DCP Staff is required. Completion of Section III to be completed by DBS Plan Check Staff is required. Plans stamped by DBS Plan Check Staff is required. See link to Preliminary Zoning Assessment Form: Zoning Assessment, Preliminary (lacity.org) • Replacement Unit Determination (RUD) Letter must be obtained from LAHD for all Housing Development Projects subject to the Housing Crisis Act or projects using an affordable housing incentive program, such as Density Bonus or TOC, unless the project consists of a single residential unit on a site zoned locally for single-family uses (e.g., A, RA, RE, RS, R1) or is an ADU or JADU that does not remove units. In this instance, the proposed project is a multi-family use. This letter is thus required but has not been submitted. The RUD will determine whether any replacement units are required, their affordability levels, and any applicable occupant		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		protections. For assistance, please contact lahd-landuse@lacity.org. • Citywide Design Guidelines Compliance Review Form CP-4056)/Plans: This form is required pursuant to the City Planning Application Filing instructions (Form CP- 7810). This was provided but needs to be amplified, corrected, clarified and supplemented as indicated. ○ Revise form to show compliance with plans; specifically, number of parking spaces, clarify size and location of balconies. Clearly illustrate pedestrian walkways on plans. Plans should clearly illustrate ingress/egress on Polk and Lyle Streets to show connectivity between the two streets. How does the driveway design protect the pedestrian experience? Guideline 3 repeats Guideline 2; neither the guidelines or plans show active engagement with the public street or public space. Neither the guidelines or plans show how human scale is maintained. Regarding Guideline 4, how does the project recognize and respect the equine district? Are there horse trails or horsekeeping uses that will be impacted? What is the height and square footage of abutting and adjacent properties? Guideline 5 states that the project is divided into multiple fourplexes; clarify the number of fourplexes and/or the configuration of triplexes and fourplexes if applicable. Regarding Guideline 6, the square footage of the		

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		recreational amenity should be calculated and applied toward the common open space requirement. If this is not possible, explain why. Show the play area, event room, and conference room on plans. Regarding Guideline 7, how have design elements been very carefully arranged to protect site users? Regarding Guideline 8, on-site and/or street trees and equine trails are unique natural resources/features. How will mature trees be protected. Discuss any equine uses in the vicinity. Furthermore, the Sylmar Community Plan (adopted June 10, 2015) discusses unique resources such as the semi-rural atmosphere and open space areas. Elaborate on these resources. Regarding Guideline 9, clearly discuss how the site layout, building massing, and building orientation have been chosen to lower energy demand and increase the comfort and well-being of users. For example, are solar panels used? The intent of Guideline 10 is to capture stormwater and promote habitat via green features. How and where will landscaping be provided? How will this guideline be fulfilled while the applicant deviates from landscaping and LID requirements? See Citywide Design Guidelines Compliance Review Form.pdf (lacity.org)		
49	Electronic Copy	Provide an electronic copy of all application materials on a USB flash		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		drive. Save each item as an individual pdf.		
For Case No. ENV-2022-9270-EAF				
50	Environmental Assessment Form (EAF) Form No. CP-1204	This form was provided but needs to be amplified, corrected, clarified, and supplemented as indicated: • Correct the Community Plan Area, page 1; • Section 2.A Existing Conditions need to indicate net and gross acres, which is currently not done; • Section 2.B Zoning/Land Use shows RD1.5 as the proposed Zoning with a Low Medium II General Plan Land Use Designation. LAMC Section 12.22 A.25 which you have filed for does not provide an entitlement path for a Zone Change from the current RA-1-K Zone and/or a General Plan Amendment from the current Very Low I Residential land use designation; • Section 2.C, Structures, and square footage of existing dwelling unit is inconsistent with plans – shall be revised to be consistent; • Complete Section 2.D., Trees – shall be completed by applicant, which is currently not done; • Complete Section 2.G. You shall complete Import/Export information which is currently not done. • Section 3.B, Recreational Facilities and Open Space: applicant shows one recreational facility, 1968.75 square feet of private open space, and 12 trees, all of which should be shown on plans but it currently is not shown on the plans.		
51	Geology and Soils Approval Letter	This is required for project within a fault zone -Sierra Madre Fault Zone – San Fernando but is not provided.		
52	Associated Application	Duplicate copy of application for the associated entitlement, Case No. CPC-2022-8993-GPA-ZC-HD-K-BL-ZV-ZAA-WDI-VHCA including Plot/Site Plans, Floor Plans, Elevations, Sections, Landscape and Open Space Plans,		

No	Item for Correction	Correction Required	Date Corrected	Initials of Approval
		Color Photos and Index Map, and Tree Report is required but has not been provided.		
53	Findings for Class 32 Exemptions	The following need to be amplified, corrected, clarified, and supplemented as indicated: • Cumulative Impacts - discuss the number and type of projects in the vicinity to find that the project will not result in cumulative impacts • Unusual circumstances – The site is located on an earthquake fault. LADBS approval of a Geology and Soils report is required. • Scenic resources – see the Sylmar Community Plan at planning.lacity.org for discussion of scenic resources in the geographic area. • Traffic Study – provide DOT referral form referenced in the application materials. • Consistency with Zoning and General Plan Designation – discuss how the project complies with the RA-1-K Zone and Very Low I Residential land use designation. • Effects relating to traffic, noise, air quality, water quality – DOT referral form required. • Provide data to find that the site can be adequately served by all required utilities and public services.		
54	Electronic Copy	Provide an electronic copy of all application materials on a USB flash drive. Save each item as an individual pdf.		

Consistent with City directives to help slow the spread of COVID-19 while continuing to deliver important City services, City Planning is minimizing in-person interaction throughout its offices. As such, we are happy to schedule a meeting with you via telephone or google meets should you need help or clarification of the above requirements. If no clarification is needed, the application materials for Case No. CPC-2022-8993-GPA-ZC-HD-K-BL-ZV-ZAA-WDI-VHCA and the associated environmental case can be filed at the Downtown Metro Development Services Center to the attention of Maritza Przekop at maritza.przekop@lacity.org or Noah McCoy at noah.mccoy@lacity.org. The address for the Downtown Metro DSC is as follows:

Department of City Planning
Metro Development Services Center
201 N. Figueroa Street, 4th Floor
Los Angeles, CA 90012
Phone: (213) 482-7077

Materials for Case No. CPC-2022-9268-DB-HCA and the associated environmental case can be submitted to me directly.

Additional information on planning processes, announcements, and upcoming policies is available on the Department's webpage at www.planning.lacity.org.

The case file for Case No. CPC-2022-9268-DB-HCA and the associated environmental case is located at my office location indicated below, and arrangements to review the case file can be made.

Thank you.

Blake Lamb for

Laura Frazin Steele, City Planner
Valley Project Planning Division
Department of City Planning
6262 Van Nuys Boulevard, Room 430
Van Nuys, CA 91401

Phone: 818.374.9919

e-mail: laura.frazinsteele@lacity.org

cc: Council District 7

PAR-2022-5834-AHRF

REFERRAL FORM

CPC 2022-9268



AFFORDABLE HOUSING REFERRAL FORM

This form is to serve as a referral to the Los Angeles City Planning's (LACP) Development Services Center (DSC) for Affordable Housing case filing purposes (in addition to the required Department of City Planning Application and any other necessary documentation); and to the City of Los Angeles Housing Department (LAHD), Department of Building and Safety (LADBS), or other City agency for project status and entitlement need purposes. All Applicants are required to provide a complete set of architectural plans at the time that this form is submitted for review. Any application submitted that is missing any required materials will be considered incomplete and will not be reviewed until all materials are submitted.

This form shall be completed by the Applicant and reviewed and signed by LACP DSC Housing Services Unit (HSU) Staff prior to filing an application for an entitlement, administrative review, or building permit. Any modifications to the content(s) of this form after its authorization by HSU Staff is prohibited. LACP reserves the right to require an updated Referral Form for the project if more than 180 days have transpired since the referral date, or as necessary, to reflect project modifications, policy changes, bus route changes, bus schedule changes, and/or amendments to the Los Angeles Municipal Code (LAMC), local laws, and State laws.

THIS SECTION TO BE COMPLETED BY HSU STAFF ONLY

Planning Staff Name & Title: Renata D. Dragland, City Planner

Planning Staff Signature:

Referral Date: 12/12/2022

Expiration Date: 6/10/2023

TRANSPORTATION QUALIFIERS (if applicable)

☐ Major Transit Stop

☐ Paratransit / Fixed Bus Route

☒ Other: N/A

Location of Transit: N/A

Qualifier #1: N/A

Service Interval #1: N/A

Service Interval #2: N/A

Qualifier #2: N/A

Service Interval #1: N/A

Service Interval #2: N/A

Service Intervals are calculated by dividing 420 (the total number of minutes during the peak hours of 6 am to 9 am and 3 pm to 7 pm) by the number of eligible trips.

Referral To:

☐ Planning DSC - Filing

☐ 100% Affordable per AB 2345¹

☐ SB 35

☐ AB 2162

☐ Measure JJJ

☒ Other: Subject to Measure JJJ. See Attachment A & email from R. Dragland dated 10/14/22.

Notes:

This Affordable Housing Referral Form (AHRF) does NOT constitute a Planning Application. Please see comments from Planning colored in blue on this form in addition to comments noted on "Attachment A" dated 12/12/22, and email dated 10/14/22 from Renata Dragland. A complete City Planning Application including plans, related materials must be submitted, and related fees paid.

THIS SECTION TO BE COMPLETED BY THE APPLICANT

APPLICANT INFORMATION

Applicant Name: Janet Jha

Phone Number: 310-995-4859

Email: akhilesh.jha@gmail.com

I. PROPOSED PROJECT

1. PROJECT LOCATION/ZONING

Project Address(es): 13916 W Polk St, Sylmar, CA 91342

Assessor Parcel Number(s): 2503007002

Community Plan: None

Existing Zone: RA-1-K

Land Use Designation: Very Low I Residential

Number of Parcels: 1

Site Size (sf): 48,284.1

☐ Specific Plan ☐ DRB/CDO ☐ HPOZ ☐ Redevelopment Project Area

☐ Enterprise Zone ☐ Q Condition/D Limitation (Ordinance No.):

☐ Other Pertinent Zoning Information (specify): ZI-2462, ZI-2438, BL case 1276

¹ AB 1763 incentives were amended by AB 2345.

2. DETAILED DESCRIPTION OF PROPOSED PROJECT

The proposed housing project is for the development of 40 residential units for rent. Eight units will be rented to Low-Income families. It will use State Density Bonus Law, Housing Accountability Law, Housing Crisis Act, and other relevant laws.

3. DETAILED DESCRIPTION OF EXISTING SITE AND DEVELOPMENT

A single family house of 1961 sf area, three bedrooms, and two bathrooms.

Existing Uses Dwelling Unit (DU) Square Footage (SF)	Existing No. of DUs or Non-Residential SF	Existing No. of DUs or Non-Residential SF to be Demolished	Proposed ² No. of DUs or Non-Residential SF
Guest Rooms			
Studios			
One Bedrooms			
Two Bedrooms			
Three Bedrooms	1	1	
4 Bedrooms			40
Non-Residential SF			
Other			

² Per AB 2556, replacement units shall be equivalent to the number of units and number of bedrooms of the existing development.

4. APPLICATION TYPE

☐ Density Bonus (per LAMC Section 12.22 A.25 or Government Code Section 65915) with only **Base Incentives** filed in conjunction with another discretionary approval.

☐ Density Bonus with **On-Menu Incentives** (specify):

- 1) _____
- 2) _____
- 3) _____
- 4) _____

Subject JJJ. ☒ Density Bonus with **Off-Menu Incentives** (specify):

- 1) Please see the attached document of the list of Incentives
- 2) _____
- 3) _____
- 4) _____

Subject JJJ. ☒ Density Bonus with **Waivers of Development Standards** (specify):

- 1) Please see the attached document of the list of Waivers
- 2) _____
- 3) _____
- 4) _____

☐ Greater Downtown Housing Incentive Area per LAMC Section 12.22 A.29

☐ Affordable Housing per LAMC Section 11.5.11 (Measure JJJ)

☐ Public Benefit Project per LAMC Section 14.00 A.2

☐ General Plan Amendment per LAMC Section 11.5.6

Request: _____

☐ Zone/Height District Change per LAMC Section 12.32

Request: _____

☐ Conditional Use per LAMC Section 12.24 U.26

☐ Site Plan Review per LAMC Section 16.05

☐ Specific Plan Project Permit Compliance per LAMC Section 11.5.7 C

☐ Community Design Overlay per LAMC Section 13.08

* Needs to be revised for the proposed project that triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/22 for required Planning entitlements and project inconsistencies.

☐ Coastal Development Permit per LAMC Section 12.20.2 or 12.20.2.1

☐ Tract or Parcel Map per LAMC Section 17.00 or 17.50

☐ Other (specify): _____

5. ENVIRONMENTAL REVIEW

☒ Project is Exempt³

☒ Not Yet Filed

☐ Filed (Case No.): _____

6. HOUSING DEVELOPMENT PROJECT TYPE

CHECK ALL THAT APPLY:

☒ For Rent ☐ For Sale ☐ Mixed-Use Project ☐ Residential Hotel

☐ Extremely Low Income ☐ Very Low Income ☒ Low Income ☐ Moderate Income

☒ Market Rate ☐ Supportive Housing ☐ Senior

☐ Special Needs (describe): _____

☐ Other Category (describe): _____

7. DENSITY CALCULATION

A. Base Density: Maximum density allowable per zoning

Lot size (including any ½ of alleys)⁴ 42,805 SF (a)

Density allowed by Zone ~~47,500~~ * SF of lot area per DU (b)

No. of DUs allowed by right (per LAMC) 2-1 * DUs (c) [c = a/b, round down to whole number]

Base Density 3-1 * DUs (d) [d = a/b, round up to whole number]

B. Maximum Allowable Density Bonus⁵ 5- N/A * DUs (e) [e = dx1.35, round up to whole number]

* Pursuant to LAMC Section 12.07 A, one-family dwelling use is permitted in RA zoned sites. Therefore, the project does not reach the 5 minimum units required for a Housing Development Project for Affordable Housing Incentives – Density Bonus, per LAMC Section 12.22 A.25. Pursuant to the LAMC Section 12.22 A.25, Housing Development Project definition: ...For the purpose of establishing the minimum number of five dwelling units, Restricted Affordable Units shall be included and density bonus units shall be excluded. The Affordable Housing Referral Form (AHRF) also needs to be revised because the proposed project triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/22 for required Planning entitlements and project inconsistencies.

³ Project may be exempt from CEQA review if it qualifies for a CEQA Exemption or is a Ministerial Project (aka, "By Right").

⁴ If there is a related subdivision case, the lot area shall be calculated based on the site area after a dedication of land has been provided.

⁵ Per AB 2345, 100% affordable housing developments may request an 80% density increase or unlimited density if the project site is within 0.5 miles of a Major Transit Stop.

C. Proposed Project: Please indicate total number of DUs requested and break down by levels of affordability set by each category (California Department of Housing and Community Development [HCD] or United States Department of Housing and Urban Development [HUD]). For information on HCD and HUD levels of affordability please contact LAHD at hcidla.landuse@lacity.org.

	Total	HCD (State)	HUD (TCAC)
Market Rate	32	N/A	N/A
Managers Unit(s) - Market Rate		N/A	N/A
Extremely Low Income (ELI) 5% ELI = 2	2	2	N/A
Very Low Income (VLI)			
Low Income (LI) 15% LI = 6	8 6	8 6	N/A
Moderate Income			
Permanent Supportive Housing — ELI			
Permanent Supportive Housing — VLI			
Permanent Supportive Housing — LI			
Seniors — Market Rate		N/A	N/A
Other			
Other			
Other			
Other			
TOTAL No. of DUs Proposed	40	(f)	
TOTAL No. of Affordable Housing DUs	8 (2 ELI+6 LI)*	(g)	
No. of Density Bonus DUs	39*	(h) [If f>c, then h=f-c; if f<c, then h= 0]	
Percent of Density Bonus Requested	3,900*	(i) {i = 100 x [(f/d) – 1]} (round down)	
Percent of Affordable Set Aside	20% of total*	(j) [g/d, round down to a whole number]	

* The base density is 1 unit, and the proposed project results in a residential density increase greater than 35%, therefore JJJ requires that *the Project shall provide no less than 5% of the total units at rents affordable to Extremely Low Income households, and either 6% of the total units at rents affordable to Very Low Income households or 15% of the total units at rents affordable to Lower Income households, inclusive of any Replacement Units* (LAMC Section 11.5.11(a)1.(ii). Needs to be revised for the proposed project that triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/22 for required Planning entitlements and project inconsistencies.

8. SITE PLAN REVIEW CALCULATION

An application for Site Plan Review (SPR) may be required for projects that meet any of the SPR thresholds as outlined in LAMC Section 16.05 C, unless otherwise exempted per LAMC Section 16.05 D. For Density Bonus projects involving bonus units, please use the formula provided below to determine if the project meets the SPR threshold for unit count. If the project meets the threshold(s) but qualifies under the exemption criteria per Section 16.05 D, please confirm the exemption with LACP's DSC HSU.

21 units allowed by right (permitted by LAMC) – 4* existing units = 17 units

☐ **YES, SPR is required.**

Proposed by-right units minus existing units is equal to or greater than 50⁶

☒ **NO, SPR is not required.**

Base Density units minus existing units is less than 50

☐ **Exempt.**

Specify reason: _____

* Needs to be revised for the proposed project that triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/22 for required Planning entitlements and project inconsistencies.

II. DENSITY BONUS (LAMC SECTION 12.22 A.25, ORDINANCE NO. 179,681)

9. PARKING OPTIONS

CHECK ALL THAT APPLY:

☐ **Automobile Parking Reductions via Bicycle Parking for Residential Uses⁷. Choose only one of the options, if applicable:**

☐ 10%

☐ 15% (*Only for residential projects or buildings located within 1,500 feet of a Major Transit Stop*)

☐ 30% (*If selecting the 30% parking reduction, the project will be ineligible for any of the Parking Options listed below*)

If selecting the 30% parking reduction, provide the following information:

Required Parking per LAMC: _____

Required Parking after the 30% reduction: _____

⁶ Site Plan Review may also be required if other characteristics of the project exceeds the thresholds listed in LAMC Section 16.05.

⁷ Any project utilizing Parking Option 3 may not further reduce automobile parking via bicycle parking.

J/A ☒ **Automobile Parking for Residential Uses (choose only one of the following options):**

Subject

o JJJ.

Note: Any fractional numbers are rounded up.

☐ **Parking Option 1.** Based on # of bedrooms, inclusive of Handicapped and Guest parking.

	# of DUs	Spaces/DU	Parking Required	Parking Provided
0-1 Bedroom		1		
2-3 Bedrooms		1.5		
4 or more Bedrooms	40	2.5	100	40
Stalls Reduced via Bike Parking				Subtract:
TOTALS	90			40

☐ **Parking Option 2.** Reduced only for Restricted Affordable Units and up to 40% of required parking for Restricted Affordable Units may be compact stalls.

	# of DUs	Spaces/DU	Parking Required	Parking Provided
Market Rate (Including Senior Market Rate)		Per Code		
Restricted Affordable		1		
VLI/LI Senior or Disabled		0.5		
Restricted Affordable in Residential Hotel		2.5		
Stalls Reduced via Bike Parking				Subtract:
TOTALS				

☐ **Parking Option 3 [AB 2345 (2020)].** Applies to two types of projects:

- 100% affordable housing developments consisting solely of affordable units, exclusive of a manager's unit(s), with an affordable housing cost to lower income families; or
- Mixed-income developments consisting of 11% VLI or 20% LI units.

☐ **100% Affordable Housing Developments.** There is no minimum parking requirement for any of the following 100% affordable housing developments described below. Check all that apply:

☐ A housing development located within 0.5 miles of a Major Transit Stop.

☐ A housing development for individuals who are 62 years of age or older with either paratransit service or unobstructed access, within 0.5 miles to a fixed bus route that operates at least eight times per day.

- ☐ **Special Needs Housing Development**, as defined in Section 51312 of the Health and Safety Code (H&SC), with either paratransit service or unobstructed access, within 0.5 miles to a fixed bus route that operates at least eight times per day.
- ☐ **Supportive Housing Development**, as defined in Section 50675.14 of the H&SC.
- ☐ **Mixed-Income Developments** consisting of 11% VLI or 20% LI units.

	Spaces/Unit	Parking Required	Parking Provided
Located within 0.5 miles of Major Transit Stop with unobstructed access to project	0.5		

Major Transit Stop is defined as a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. It also includes major transit stops that are included in the applicable regional transportation plan.

Bus Rapid Transit is defined as public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features:

- 1) Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- 2) Transit signal priority.
- 3) All-door boarding.
- 4) Fare collection system that promotes efficiency.
- 5) Defined stations.

10. INCENTIVES

A. Qualification for Incentives

Below is the minimum Required Restricted Affordable Housing Units, calculated as a percentage of the base density allowed on the date of the application. Check only one:

Incentives	% Very Low Income	% Low Income	% Moderate Income
One	☐ 5% to <10%	☐ 10% to <20%	☐ 10% to <20%
Two	☐ 10% to <15%	☐ 20% to <30%	☐ 20% to <30%
Three	☐ 15% or greater	N/A ☒ 30% or greater	☐ 30% or greater

N/A. Subject to Measure JJJ, complete Items 13 through 15 below.

100% Affordable Housing Developments may request up to four (4) incentives and one (1) Waiver of Development Standard. Check this box if this applies to the project.

N/A. **B. Project Zoning Compliance & Incentives** (Only for projects requesting a Density Bonus with Incentives/Waivers) *

	Permitted w/o Incentives	Proposed per Incentives	On-Menu	Off-Menu
☐ Yard/Setback (each yard counts as one incentive)				
☐ Front (1)	_____	_____	☐	☐
☐ Front (2)	_____	_____	☐	☐
☐ Side (1)	_____	_____	☐	☐
☐ Side (2)	_____	_____	☐	☐
☐ Rear	_____	_____	☐	☐
☐ Lot Coverage	_____	_____	☐	☐
☐ Lot Width	_____	_____	☐	☐
☐ Floor Area Ratio ⁸	_____	_____	☐	☐
☐ Height/Stories ⁹	_____	_____	☐	☐
☐ Overall Height	_____	_____	☐	☐
☐ Transitional Height(s)	_____	_____	☐	☐
☐ Open Space	_____	_____	☐	☐
☐ Density Calculation	_____	_____	☐	☐
☐ Averaging (all count as one incentive — check all that are needed)				
☐ FAR				
☐ Density				
☐ Parking				
☐ Open Space				
☐ Vehicular Access				
☒ Other Off-Menu Incentives (specify): <u>Please see the attached document</u>				
<u>Please see the attached document</u>				
☒ Waiver of Development Standards (specify): <u>Please see the attached document</u>				
<u>Please see the attached document</u>				
☐ 100% Affordable Housing Development shall receive a height increase of three additional stories up to 33 additional feet. Check the box if this applies to your project.				

TOTAL No. of Incentives Requested: On-Menu _____ Off-Menu 3*

TOTAL No. of Waivers Requested: 14*

⁸ See LAMC Section 12.22 A.25(f)(4) for additional requirements.

⁹ See LAMC Section 12.22 A.25(f)(5) for additional requirements.

* Needs to be revised for the proposed project that triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/2 for required Planning entitlements and project inconsistencies.

11. COVENANT

All Density Bonus projects are required to prepare and record an Affordability Covenant to the satisfaction of the LAHD's Occupancy Monitoring Unit **before** a building permit can be issued. For more information, please contact the LAHD at hcidla.landuse@lacity.org.

III. GREATER DOWNTOWN HOUSING INCENTIVE AREA (LAMC SEC. 12.22 A.29, ORDINANCE NO. 179,076)

12. GREATER DOWNTOWN HOUSING INCENTIVE AREA (GDHIA)

A. Eligibility for Floor Area Bonus

NOTE: The affordability levels required are set by the HUD/TCAC. For information on HCD and HUD levels of affordability please contact the LAHD at hcidla.landuse@lacity.org.

- ☐ 5% of the total number of DUs provided for VLI households; and
- ☐ One of the following shall be provided:
 - ☐ 10% of the total number of DUs for LI households; or
 - ☐ 15% of the total number of DUs for Moderate Income households; or
 - ☐ 20% of the total number of DUs for Workforce Income households, and
- ☐ Any DU or Guest Room occupied by a household earning less than 50% of the Area Median Income (AMI) that is demolished or otherwise eliminated shall be replaced on a one-for-one basis within the Community Plan area in which it is located

B. Incentives

NOTE: Must meet all three (3) eligibility requirements from 12.A above and provide a Covenant & Agreement (See #11).

CHECK ALL THAT APPLY:

- ☐ A 35% increase in total floor area
- ☐ Open Space requirement pursuant to LAMC Section 12.21 G reduced by one-half, provided that a fee equivalent to amount of the relevant park fee, pursuant to LAMC Section 19.17, shall be paid for all dwelling units. See LAMC Section 12.29 A.29(c) for exceptions
- ☐ No parking required for units for households earning less than 50% AMI
- ☐ No more than one parking space required for each dwelling unit

C. Additional Incentives to Produce Housing in the GDHIA

- ☐ No yard requirements except as required by the Urban Design Standards and Guidelines
- ☐ Buildable area shall be the same as the lot area (for the purpose of calculating buildable area for residential and mixed-use)

- ☐ Maximum number of dwelling units or guest rooms permitted shall not be limited by the lot area provisions, as long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by dwelling units
- ☐ No prescribed percentage of the required open space that must be provided as either common open space or private open space

IV. MEASURE JJJ¹⁰ (LAMC Sec. 11.5.11, Ordinance No. 184, 745)

13. AFFORDABLE REQUIREMENTS*

A certain percentage of affordable units is required based on the total number of units in the project.
Fill out either A or B below:

A. Rental Projects

- ☐ No less than the affordability percentage corresponding to the level of density increase requested or allowed:
 - ☐ _____ % VLI **OR** ☐ _____ % LI
- ☒ For projects requesting a General Plan Amendment, Zone Change, and/or Height District Change that results in an increased allowable density greater than 35%:
 - ☒ 5% ELI **AND** ☐ 6% VLI **OR** ☒ 15% LI
- ☐ For projects requesting a General Plan Amendment, Zone Change, and/or Height District Change that results in an increased allowable density greater than 35%:
 - ☐ 5% ELI **AND** ☐ 11% VLI **OR** ☐ 20% LI

Required Number of Affordable Units

ELI 2 VLI _____ LI 8-6

B. For Sale Projects

- ☐ No less than the affordability percentage corresponding to the level of density increase requested or allowed:
 - ☐ _____ % VLI **OR** ☐ _____ % LI **OR** ☐ _____ % Moderate Income
- ☐ For projects requesting a General Plan Amendment, Zone Change, and/or Height District Change that results in an increased allowable density greater than 35% or allows a residential use where not previously allowed:
 - ☐ 11% VLI **OR** ☐ 20% LI **OR** ☐ 40% Moderate Income

Required Number of Affordable Units

VLI _____ LI _____ Moderate Income _____

* Needs to be revised for the proposed project that triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/22 for required Planning entitlements and project inconsistencies.

¹⁰ All fractional amounts in Sections 13 and 14 shall be rounded up to the next whole number.

14. ALTERNATIVE COMPLIANCE OPTIONS

In lieu of providing the affordable units on site, there are three (3) other options available to comply with Measure JJJ Affordable Requirements. Select one, if applicable; otherwise leave this section blank.

A. Off-Site Construction – Construction of affordable units at the following rate:

- ☐ Within 0.5 miles of the outer edge of the Project, Affordable Units in Section 13 x 1.0
- ☐ Within 2 miles of the outer edge of the Project, Affordable Units in Section 13 x 1.25
- ☐ Within 3 miles of the outer edge of the Project, Affordable Units in Section 13 x 1.5

Updated Required Number of Affordable Units

ELI _____ VLI _____ LI _____ Moderate Income _____

B. Off-Site Acquisition – Acquisition of property that will provide affordable units at the following rate:

- ☐ Within 0.5 miles of the outer edge of the Project, Affordable Units in Section 13 x 1.0
- ☐ Within 1 mile of the outer edge of the Project, Affordable Units in Section 13 x 1.25
- ☐ Within 2 miles of the outer edge of the Project, Affordable Units in Section 13 x 1.5

Updated Required Number of Affordable Units

ELI _____ VLI _____ LI _____ Moderate Income _____

C. In-Lieu Fee – From the Affordability Gaps Study published by the Los Angeles City Planning

Total In-Lieu Fee _____ (Note: Final fee TBD if/when the project is approved)

15. DEVELOPER INCENTIVES*

Please describe up to a maximum of three (3) incentives:

- 1) _____

- 2) _____

- 3) _____

Disclaimer: This review is based on the information and plans provided by the applicant at the time of submittal of this form. Applicants are advised to verify any zoning issues such as height, parking, setback, and any other applicable zoning requirements with LADBS.

* Needs to be revised for the proposed project that triggers Measure JJJ requirements pursuant to LAMC Sections 11.5.6A, 11.5.11, 12.32F, and City Charter Section 555. See Attachment A and email from R. Dragland dated 10/14/22 for required Planning entitlements and project inconsistencies.