

FIX THE CITY

Via email: Iris.Wan@lacity.org

August 28, 2020

RE: 5411 WILSHIRE BLVD. (CPC 2020-3143-DB-CDO-SPR-HCA)

Dear Ms. Wan:

1. Maximum DU = 194, NOT 348

In reviewing the application for this project dated 3/2/20, several base entitlement questions have arisen. We appreciate your assistance in answering the following:

- A. The lot area is 57,488 SF. At 400 SF/lot area, this would provide a base density of 144 **dwelling units**. With a 35% density increase under LAMC 12.22 A25, it would permit **194** dwelling units, NOT the **348 dwelling units** claimed in the application. Please confirm our calculation and correct the application.
- B. A Zone Change/General Plan Amendment would be required to increase the density beyond 194 units. Correct?
- C. The required VLI units would be 11% of the base (144 DU), which would be 16 VLI units. Is this correct?
- D. The bonus requires **all** 11% of the units be VLI, not a combination of VLI and moderate income as proposed in the Application. Correct?
- E. The maximum increase in FAR permitted under LAMC 12.22 A25(f)(4) is not to exceed 35%. Please calculate the FAR bonus at 35% and correct the application. If the Applicant seeks more than 35%, he must apply for a Height District Amendment under Measure JJJ Section 5.

2. Incentives Under LAMC 12.22 A25 are Limited to Two (2), NOT 4 as requested

- A. Under LAMC 12.22 A25 if this project provides 11% of the base density (144 DU) VLI affordable dwelling units (16 VLI Dwelling Units), it qualifies for **2 incentives**; they can be on- or off-menu. Correct?
- B. The requested approvals are for four (4) incentives as stated on page 1 of Attachment A of the application. Correct?
- C. Off-menu incentives are limited to incentives, waivers, etc. NOT on the menu, per LAMC 12.22 A25(g)(3)
- D. The density bonus permitted under LAMC 12.22 A25(c) is limited to 35%.
- E. The request for *more than 35% FAR increase cannot be granted under LAMC 12.22 A25(f)(4)(i)*: "A percentage increase in the allowable Floor Area Ratio equal

FIX THE CITY

to the percentage of Density Bonus for which the Housing Development Project is eligible, **not to exceed 35%**" (emphasis added). In this case, the maximum is 35% increase in density and FAR.

- F. A larger increase would require a **Height District Amendment** under Measure JJJ Section 5.
- G. A full EIR is required for a project of this magnitude, particularly due to the large related projects in the Miracle Mile, including the Academy Museum, LACMA, 629 South La Brea Ave. 90036, and the proposed Courtyard project.

Please place this letter into the record for CPC 2020-3143-DB-CDO-SPR-HCA.

Sincerely,

James O'Sullivan

James O'Sullivan, VP

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