

**SUPPLEMENTAL
REPORT TO THE REGIONAL PLANNING COMMISSION**

DATE ISSUED: April 28, 2026

HEARING DATE: April 29, 2026 AGENDA ITEM: 12

PROJECT NUMBER: PRJ2023-002770-(2)

PERMIT NUMBER(S): Specific Plan Amendment No. RPPL2023004093
Development Agreement No. RPPL2023005669
Conditional Use Permit No. RPPL2023004092
Administrative Housing Permit No. RPPL2023004095
Environmental Plan No. RPPL2023004097

SUPERVISORIAL DISTRICT: 2

PROJECT LOCATION: 1667 E. 118th Street, Willowbrook, CA 90059

OWNER: Compton Unified School District & LA County
Development Authority

APPLICANT: CDU/MLK Wellness Collaborative, LLC

PUBLIC MEETINGS HELD: 1 OF 5

INCLUSIONARY ZONING
ORDINANCE (IZO): The Project is not subject to the IZO because it is
located within a submarket area that does not require
inclusionary housing.

CASE PLANNER: Bryan S. Moller, Senior Regional Planner
bmoller@planning.lacounty.gov

RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:

LA County Planning staff (“Staff”) recommends that the Regional Planning Commission **ADOPT THE RESOLUTIONS RECOMMENDING THAT THE BOARD OF SUPERVISORS ADOPT** Specific Plan Amendment (“PA”) No. RPPL2023004093, Development Agreement (“DA”) No. RPPL2023005669, **AND APPROVE** Conditional Use Permit Number (“CUP”) No. RPPL2023004092, Administrative Housing Permit (“HP”) No. RPPL2023004095, and Environmental Plan No. RPPL2023004097, based on the Findings (Exhibit C of the Hearing Package) and subject to the Draft Conditions of Approval as modified herein (Exhibit B attached).

PROJECT NO. PRJ2023-002770-(2)
SPECIFIC PLAN AMENDMENT NO. RPPL2023004093
DEVELOPMENT AGREEMENT NO. RPPL2023005669
CONDITIONAL USE PERMIT NO. RPPL2023004092
ADMINISTRATIVE HOUSING PERMIT NO. RPPL2023004095
ENVIRONMENTAL PLAN NO. RPPL2023004097

April 29, 2026

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Staff recommends the following motions:

CEQA:

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING, AND, HAVING CONSIDERED THE ADDENDUM ALONG WITH THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE WILLOWBROOK TRANSIT-ORIENTED DISTRICT SPECIFIC PLAN (ENVIRONMENTAL ASSESSMENT NO. 201500136), HEREBY APPROVE THE ADDENDUM TO THE CERTIFIED FINAL ENVIRONMENTAL IMPACT REPORT (ENVIRONMENTAL PLAN NO. RPPL2023004097) AND THE RELATED MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PROJECT.

ENTITLEMENTS:

I MOVE THAT THE REGIONAL PLANNING COMMISSION ADOPT THE RESOLUTIONS RECOMMENDING THAT THE BOARD OF SUPERVISORS APPROVE SPECIFIC PLAN AMENDMENT NO. RPPL2023004093 AND DEVELOPMENT AGREEMENT NO. RPPL2023005669, AS WELL AS CONDITIONAL USE PERMIT NO. RPPL2023004092 AND ADMINISTRATIVE HOUSING PERMIT NO. RPPL2023004095 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS AS MODIFIED.

PROJECT DESCRIPTION

A Plan Amendment, Development Agreement, Conditional Use Permit, Administrative Housing Permit, and Environmental Plan to expand the Charles Drew University campus consisting of offices, athletics/recreation facilities, a parking structure, university housing including three student housing buildings (250 units), one faculty/staff housing building (55 units), and off-campus, non-university affordable housing in four apartment buildings (up to 200 units) and one affordable senior housing building (up to 54 units).

ADDITIONAL CORRESPONDENCE

On April 28, 2026, Staff received a letter of support from the Compton Unified School District (CUSD). The letter notes that the increase in housing in the community would help CUSD's declining enrollment and that the community benefits the Proposed Project provides, such as the open space, would enhance the community.

REVISIONS TO PROPOSED CONDITIONS OF APPROVAL

Following their review of the posted Hearing Package, the Permittee requested updates to four of the draft conditions of approval as summarized here:

1. Condition #29 to be updated to reflect that the public access to meeting spaces will be in university-designated spaces.

2. Condition #30 to be updated to reflect compliance with the County's Public Art in Private Development Ordinance.
3. Condition #34 to be updated to reflect that the grant will not modify any existing enrollment limit.
4. Condition #39 to be updated to create a mechanism to extend housing opportunities to persons that are not staff or faculty in the proposed staff/faculty housing building via a preference program and in accordance with applicable housing laws.

Attached to this supplemental report as Exhibit B is an updated version of the proposed conditions of approval with the specific revised language in track changes. Staff supports the modified language.

Further, staff did not attach the department clearance and Letter of Conditions from the Department of Public Health. The letter has been attached to the Conditions of Approval here.

Report Reviewed By: *M. Glaser* for Kevin Finkel
Kevin Finkel, AICP, Acting Assistant Deputy Director

Report Approved By: *M. Glaser*
Mitch Glaser, AICP, Assistant Deputy Director

LIST OF ATTACHED EXHIBITS	
EXHIBIT A	Letter from CUSD
EXHIBIT B	Conditions



Office of the Board of Trustees

501 S. Santa Fe Ave., Room 120,

Compton, CA 90221

Phone: (310) 639-4321, Ext. 55125 • Fax (310) 632-3014

Micah Ali
President

April 27, 2026

Michael Hooper
Vice President

VIA ELECTRONIC MAIL

Satra Zurita
Clerk

Los Angeles County Regional Planning Commission
Attn: Bryan S. Moller, Senior Regional Planner
320 W Temple Street
Los Angeles, CA 90012
Phone: (213) 974-6411
E-mail: bmoller@planning.lacounty.gov

Ayanna Davis Ed.D.
Legislative Representative

**Re: Compton Unified School District's Letter in Support of the
CDU Wellness and Education Campus Project (Project No. 2023-
002770-2) –Resolution No. 17/18-84**

Alma Taylor Pleasant
Member

Dear Mr. Moller and Commissioners:

Sandra Moss
Member

The Compton Unified School District (“District”) submits this letter in support of the proposed CDU Wellness and Education Campus Project (Project No. 2023-002770-2) (“Project”) and its Addendum (“Addendum”) to the Willowbrook Transit Oriented District Specific Plan Final Program Environmental Impact Report (SCH No. 2015101106) (“FEIR”) in advance of the Los Angeles County (“County”) Regional Planning Commission’s (“Commission”) April 29, 2026, public hearing.

Denzell Perry
Member

Darin Brawley, Ed.D.
Superintendent

I. Introduction

The Project is located at 1667 East 118th Street, Los Angeles, California 90059 (Assessor Parcel Numbers (“APN”): 6149-012-901, 6149-014-900, 6149-014-903, and 6149-014-904), which is the District’s former Lincoln Elementary School site (“Lincoln”) and 1655 E. 117th Street, Los Angeles, California 90059 (APN: 6149-014-906), which was owned by the Los Angeles County Development Authority (“LACDA”) and has been managed by the County. The Lincoln property and County property are collectively referred to herein as “Site”. The Project represents an important investment in educational infrastructure, community wellness, and equitable development within the Willowbrook community. The 12.8-acre development will facilitate an expansion of the Charles Drew University campus, including a combination of

educational, residential, and community-serving uses, including academic and clinical space, affordable units for specific populations (e.g., students, seniors, etc.), athletic and recreational facilities, and structured parking, in addition to 250 units of deed-restricted affordable housing. (Addendum, pp. 1-3, 2-2.)

The Project now appears before the Commission for a recommendation for approval to the County Board of Supervisors (“Board”) regarding approval of the following:

- Plan Amendment No. RPPL2023004093,
- Ministerial Site Plan Review No. RPPL2024001835,
- Administrative Housing Permit No. RPPL2023004095,
- Conditional Use Permit No. RPPL2023004092,
- Development Agreement No. RPPL2023005669,
- Street Vacation, and
- Environmental Plan No. RPPL2023004097 (collectively, “Entitlements”).

The Project’s benefits extend beyond new housing and include meaningful and far-reaching contributions to the education, health and wellness of the Willowbrook community through the integration of education, recreation, open space, community-oriented design and programmatic features,¹ and more. The following summarizes some, but not all, of the features that make the Project particularly critical to the viability and success of the Willowbrook neighborhood.

II. Statutory Framework

A. Procurement Approach

The District procured the Project under the Joint Occupancy statutes (Ed. Code, § 17515 et seq.), and LACDA procured the Project pursuant to its authority set forth in the inter-agency exemption authorized by Cal. Government Code Section 54331(f)(1)(D). Collaboratively, the District and LACDA completed an open and competitive bid exemption for surplus land pursuant to Cal. Government Code Section 54221(f)(1)(F). Section III of this letter summarizes how the District has proceeded with disposition of Lincoln, and advanced implementation of the Project in accordance with the governing statutes.

B. Exemption From the SLA

Although the Surplus Land Act (“SLA”) generally governs local agency property dispositions, projects undertaken pursuant to the Joint Occupancy statutes are expressly exempt. The District’s Board adopted the SLA exemption resolution on June 18, 2024. On September 11, 2024, the California Department of Housing and Community Development determined that Lincoln is exempt surplus land, attached as Exhibit A.

¹ The Project contemplates improved bicycle and pedestrian mobility and safety, safe access to the Willowbrook/Rosa Parks Station from the Site, preservation of Willowbrook’s economic base and character—all with the aim of revitalizing the services at Charles R. Drew University of Medicine and Science (“CDU”) and creating an attractive and wellness-focused environment for Willowbrook’s traditionally underserved population. (Addendum, p. 2-2.)

III. Project Background

On June 27, 2018, after multiple discussions with LACDA regarding joint development opportunities for the Site, the District adopted Resolution No. 17/18-24 to further explore these opportunities. On February 11, 2019, the District and County entered into a Memorandum of Understanding (“MOU”) to work jointly on developing the Site. Subsequently, the District and County, through LACDA, held a dozen stakeholder meetings with various entities in the area to determine the best use of the Site that could provide substantial community benefits as well as benefits to the District. Accordingly, the District and LACDA staff developed a proposed vision for the Site and jointly issued a Request for Qualifications and Proposals (“RFQ/P”) on November 19, 2019.

The Project has undergone multiple years of planning and compliance with applicable state and local laws, including CEQA and statutory obligations governing school district real property transactions. The District’s support of the Project and consideration of its benefits for District students and the Willowbrook community are evident throughout the Project’s chronology from inception to the present. The following chart summarizes the Project’s chronology.

June 27, 2018	Resolution No. 17/18-84 Resolution of Intention of the Board of Trustees of the Compton Unified School District to Consider Potential Joint Development Opportunities with the LACDA for District Owned Real Property
February 11, 2019	County & District MOU effective date.
July 2019	County & District Joint Stakeholder Meetings (CDU, MLK Hospital, Metro, King Drew HS, Linc Housing, Thomas Safran Associates, MLK Community Foundation, Fischer Partners and AECOM, MLK Outpatient Center, Integral Communities, LA County Public Health, LA County WDACS)
August 11, 2019	County & District MOU Amendment 1, extended to 2/11/2020.
November 13, 2019	District Resolution No. 19/20-19 Resolution of Intention to Consider Proposals for Joint Occupancy
November 19, 2019	County & District Joint RFP issued.
December 12, 2019	Pre-Proposal Meeting for RFP
January 30, 2020	Original Deadline for RFP Proposals
February 11, 2020	County & District MOU Amendment 2, extended to 2/11/2021.
January 22, 2020	County & District Joint RFP deadline extended to 2/13/2020
July 7, 2020	Proposers Presentations
August 11, 2020	District Resolution Approving Entering Into ENA with the CDU Wellness and Education Collaborative

November 10, 2020	County Board of Supervisors meeting.
November 24, 2020	County Board of Supervisors meeting; adopted ENA and extension of MOU.
March 9, 2021	County & District MOU Amendment 3, extended to 12/31/2022.
April 7, 2021	CDU & District enter ENA.
December 21, 2021	County Dept. of Economic Oversight (DEO) assumes administrative oversight of the proposed Project for the development of the LA County Development Authority Property.
March 2, 2022	Willowbrook Site Walk
April 7, 2022	ENA Amendment 1, extended term 180 days to 10/4/2022.
April 12, 2022	Resolution to Amend ENA
July 19, 2022	Community outreach meeting.
August 30, 2022	Zoom Community Meeting
October 8, 2022	ENA Amendment 2, extended to 12/31/2023.
February 8, 2023	County & District MOU Amendment 4, extended to 12/31/2023.
November 14, 2023	District Resolution No. 23/24-36 Resolution of intention to consider granting an easement for public road and highway purposes to the County of LA.
December 12, 2023	District Resolution granting easement for the Willowbrook Project
January 18, 2024	ENA Amendment 3, extended term to 6/30/2024.
June 18, 2024	District Resolution No. 23/24-79 to declare Lincoln ES as Exempt Surplus Land pursuant to SLA.
August 29, 2024	ENA Amendment 4, extended term to 6/30/2025.
July 30, 2025	ENA Amendment 5, extended term to 12/31/2025.
April 29, 2026	Regional Planning Commission public hearing
TBD	Board of Supervisors public hearing
TBD	CDU board consideration of ground leases
TBD	District Resolution to approve project and ground leases

IV. Project Benefits

A. Community Benefits

1. Educational Pipeline Programs

The Project promotes educational opportunities for community members and District students through expansion of the Charles Drew University (“University”) campus to accommodate 2,000 to 4,000 students. (Development Agreement, Exhibit (“Community Benefits”).) The new campus will be utilized to expand existing University pipeline programs, including the Saturday Science Academy, Public Health Professions Pathways Program, the joint University and District 3-Year Bachelor’s Program, and the Junior White Coat Program, to name a few. (*Ibid.*, § 1.) These programs provide instruction in math, science, research, and experiential learning at dedicated, state-of-the-art instructional and laboratory spaces at the Site. (*Ibid.*, §§ 1, 4.3.1.)

Further, the Project will provide no-cost participation in the University’s Saturday Science Academy program for students residing within a quarter-mile of the Site, subject to certain qualifications. (*Id.*, § 2.) The expanded campus will be well-equipped to lower barriers to participation in and increase access to these critical programs.

2. Affordable and Student Housing

The Project proposes 200 residential units in four buildings and up to 54 affordable senior units in a single dedicated building. (Addendum, p. 2-8.) These units will provide housing opportunities for low- and moderate-income households within the community earning up to 80% of area median income (“AMI”).

The Project also proposes 250 student units and 55 faculty and staff units. (Addendum, pp. 2-9, 2-10.) By integrating both affordable and education-serving units, the Project expands housing access across several sectors of the community, supports attainment of higher education goals, reduces commuting burdens and displacement pressure on students, and reduces the number of vehicle miles traveled (“VMT”) associated with commuting to and from the University. (Community Benefits, § 3.2.)

By providing an array of unit types while reserving the majority of units for students and individuals seeking affordability, the Project supports the growth of the County, as well as long-term community stability and retention. The residential element also offers families, seniors, students, and staff the opportunity to experience the benefits of a high quality, education-oriented living environment (e.g., living beside a park with several options for recreation) without the risks, costs, and sacrifices associated with homeownership.

3. *Open Space and Recreational Facilities*

The Project will include approximately 4.7 acres of open space, comprised of landscaped areas; a publicly accessible walking loop; and athletic facilities including a multi-purpose California Interscholastic Federation regulation soccer field, basketball court, swimming pool, indoor track, and designated exercise space—all designed to facilitate community recreation, health, and wellness. (Addendum, pp. 2-10-2-12.)

Many of these facilities will be available to community organizations and the public through scheduled access, including during evenings and weekends, while others are available for unrestricted use during daylight hours. (Community Benefits, § 4.2.2.)

Further, the Project will convert approximately 700 linear feet of East 118th Street into a publicly accessible pedestrian promenade with landscaping, seating, pedestrian pathways, and bicycle lanes. (*Id.*, § 4.4.) This element offers the community additional recreational space while also improving connectivity and walkability across the Site.

Last, the Project contemplates joint-use arrangements with K-12 schools and youth organizations, allowing District students and the community to utilize these facilities for organized programming. (*Id.*, § 4.2.2.)

Tangentially, the Project will enhance neighborhood safety, aesthetics, and agency by activating an under-utilized site, increasing local spending by new residents and students, potentially increasing property values in the surrounding neighborhood, and strengthening community engagement.

4. *Community Programming and Event Spaces*

The Project contemplates that the new campus will host a minimum of twelve (12) publicly accessible programs annually, including, for example:

- Mobile Health Outreach to provide health screenings, vaccinations, and other health services;
- Medical wellness checks;
- Health and wellness information sessions on topics such as exercise, diet, the healthcare system, and maternal health;
- Community empowerment events including educational fairs, job fairs, and an empowerment conference;
- Community gathering events celebrating cultural activities; and
- Farmers markets. (*Id.*, § 4.4.2.)

These programs are designed to be delivered directly on the Site, thereby reducing barriers to access to health and empowerment services by locating them within walking distance of surrounding residents and students. (*Id.*, § 4.4.) These programs are also designed to become integrated and recurring features of the Project and campus.

Further, when not in use by the University, community groups may reserve the facilities for meetings, classes, and community activities through the reservation system, including on evenings and weekends. (*Id.*, § 4.3.2.)

Alongside these programs and events, and to further reduce VMT, the Project proposes retail uses, including a café and bookstore which would serve University students and staff, as well as the broader community. (*Id.*, § 4.3.3.)

5. *Revitalization and Community Impact*

The Project would activate and transform a former school site and currently under-utilized land into a highly productive asset, not only for the immediate neighborhood and District, but also for the broader community, as described above. To ensure alignment with local needs, community input to the District and County informed several elements of the Project. (See Section III above.)

B. District Benefits

1. *Enrollment and Funding*

By increasing the supply of housing, the Project is expected to mitigate the District's declining enrollment and increase average daily attendance with direct implications for increased state funding.² The District's enrollment has steadily trended downward since approximately the 2002-2003 academic year, likely due to factors such as the rise of charter schools, lower birth rates, and emigration out of the District and the state.³

2. *Educational Pipeline Programs*

One aim of the Project is to target and remove barriers to higher education. As mentioned previously, the Project does so by providing the community, and particularly District students, access to educational pipeline programs at the University in science and health-related disciplines. This effort facilitates meaningful career pathways and interests that District students and community members may not have considered, absent such exposure.

3. *Revenue Generation*

Last, the Project will generate ongoing and substantial lease revenue which can be utilized, subject to Board approval and direction, to support any lawful District purpose, including funding educational programs, maintaining facilities, supporting core operations, or increasing salaries in order to attract and retain talented teachers. After extensively evaluating potential uses and dispositions for the Site, the District chose to lease rather than sell or exchange in order to retain flexibility in revenue use, as proceeds from a sale would be more restricted under Education Code section 17462.

The Project represents a holistic approach to the County's and community's civic goals and the District's solution to revenue generation for General Fund purposes and long-term growth of the District's student population, while realizing substantial community and District-focused benefits.

² Data available here: <https://www.ed-data.org/district/los-angeles/compton-unified>.

³ Data available here: https://www.compton.edu/about/institutional-effectiveness/regional/HighSchoolEnrollmentTrends_CEC2013.pdf.

C. Environmental Benefits

Within the requested Entitlements is certification of the Addendum, which concludes that the Project will not result in any new or more severe environmental impacts beyond those previously analyzed and mitigated in the FEIR. (Addendum, p. 3-8.) The Project's health-centric theme does not end at community and individual health and wellness but also incorporates comprehensive sustainability features including all-electric building systems, on-site renewable energy generation, electric vehicle infrastructure, and energy efficiency features. (*Id.*, pp. 2-25-2-27.)

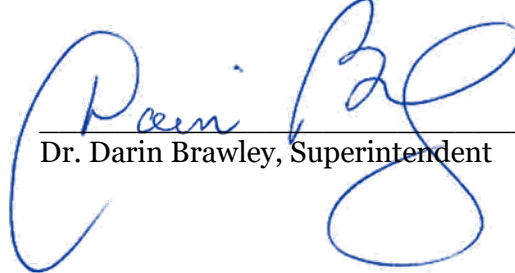
The District respectfully requests that the Commission recommend approval of the Entitlements to the County Board of Supervisors. Doing so would help advance goals that provide far-reaching and tangible benefits to the District, the Willowbrook Community, and the County. The District appreciates the Commission's consideration and will continue to work collaboratively with the County to ensure the Project is implemented successfully. Should the Commission have any questions, it may contact the District.

Sincerely,

COMPTON UNIFIED SCHOOL DISTRICT



Micah Ali, Board President



Dr. Darin Brawley, Superintendent

cc: Orbach Huff & Henderson LLP

EXHIBIT A

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannon Street, Suite 400, Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



September 11, 2024

Shannon Soto, Chief Administrative Officer
Business Services
Compton Unified School District
501 S. Santa Fe Avenue
Compton, CA 90220

SENT VIA EMAIL TO: ssoto@compton.k12.ca.us

Dear Shannon Soto:

RE: HCD's Review of Compton Unified School District's Resolution No. 23/24-79 Declaring Property Located at 1667 East 118th Street in the City of Los Angeles (APNs 6149-012-901, 6149-014-900, -903, -904) as "Exempt Surplus Land"

Thank you for notifying the California Department of Housing and Community Development (HCD) of Compton Unified School District's (District) determination of Property Located at 1667 East 118th Street in the City of Los Angeles (APNs 6149-012-901, 6149-014-900, -903, -904) (Property), as "exempt surplus land."

HCD reviewed Resolution No. 23/24-79 (Resolution) pursuant to Section 400 of the Surplus Land Act Guidelines. As explained below, HCD finds that the subject Property qualifies as "exempt surplus land" under Government Code section 54221, subdivision (f)(1)(L)(i).

Analysis

According to Government Code section 54221, subdivision (f)(1)(L), "exempt surplus land" means:

Land that is subject to either of the following unless compliance with this article is expressly required:

- i. Sections 17388, 17515, 17536, 81192, 81397, 81399, 81420, or 81422 of the Education Code.
- ii. Part 14 (commencing with Section 53570) of Division 31 of the Health and Safety Code. (Emphasis added.)

According to the Resolution, the Property is the former Lincoln Elementary School Site and is adjacent to property owned by the County of Los Angeles (County). Pursuant to Education Code 17515 which allows for the District to generate revenue via a Joint Occupancy development, on November 13, 2019, the District adopted Resolution No. 19/20-19, which authorized staff to provide notice of the District's intent to accept proposals for the joint occupancy of the Property and County property. On August 11, 2020, after staff had reviewed the proposals and interviewed stakeholders, the Board adopted Resolution No. 20/21-02, which authorized execution of an exclusive negotiation agreement between the District, County, and Charles Drew University/MLK Wellness Collaborative, LLC (Developer), (collectively, Parties), to allow the Parties to negotiate the terms of one or more ground lease agreements in order to facilitate the development of a proposed project.

The proposed project is to develop the Property alongside County property as a vibrant mixed-use health and wellness campus including affordable, workforce, student, and mixed-income housing; office, retail, research, community, and clinic space; athletics and recreational facilities; and parking for the to-be-developed uses (Proposed Project). The Proposed Project includes 249 units of deed-restricted affordable housing at 30%, 50%, 60%, and 80% AMI as well as student housing for over 900 Charles Drew University (CDU) undergraduate students and 70-units of workforce housing (affordable to District faculty/staff and CDU faculty, staff, and graduate students). The housing components of the Proposed Project will be contained in ten buildings. Furthermore, on September 6, 2024, the District confirmed that none of the characteristics listed in Government Code section 54221(f)(2) apply to the Property.

Conclusion

Based on the documentation provided, HCD finds that the Property qualifies as "exempt surplus land" under Government Code section 54221, subdivision (f)(1)(L)(i), because the Property is subject to Education Code section 17515 and compliance with the Surplus Land Act is not expressly required.

If you have any questions or need additional technical assistance, please contact Sandra Mukasa, Senior Housing Policy Specialist at Sandra.Mukasa@hcd.ca.gov.

Sincerely,



Laura Nunn
Senior Manager, Housing Accountability Unit
Housing Policy Development

cc: Tempestt Garland, Orbach Huff & Henderson LLP

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING

DRAFT CONDITIONS OF APPROVAL
PROJECT NO. PRJ2023-002770-(2)
CONDITIONAL USE PERMIT NO. RPPL2023004092
ENVIRONMENTAL PLAN NO. RPPL2023004097

PROJECT DESCRIPTION

The project is an expansion of Charles Drew University consisting of university offices, university athletics facilities, student and faculty/staff housing, a street vacation, and non-university related affordable housing subject to the following conditions of approval:

GENERAL CONDITIONS

1. **Permittee.** Unless otherwise apparent from the context, the term “Permittee” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. **Affidavit of Acceptance.** This grant shall not be effective for any purpose until the Permittee, and the owner of the subject property if other than the Permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 7, and until all required monies have been paid pursuant to Condition No. 10 and 11, and 14. Notwithstanding the foregoing, Condition No. 2 and Condition Nos. 4, 5, 8, and 11 shall be effective immediately upon the date of decision of this grant by the County.
3. **Date of Final Approval.** Unless otherwise apparent from the context, the term “date of final approval” shall mean the date the County’s action becomes effective pursuant to County Code Section 22.222.230 (Effective Date of Decision and Appeals).
4. **Indemnification.** The Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code section 65009 or any other applicable limitations period. The County shall promptly notify the Permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
5. **Litigation Deposit.** In the event that any claim, action, or proceeding as described above is filed against the County, the Permittee shall within ten days of the filing make an initial deposit with LA County Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning's cooperation in the

defense, including but not limited to, depositions, testimony, and other assistance provided to Permittee or Permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Permittee according to County Code Section 2.170.010 (Fees for Providing County Records).

6. **Invalidation.** If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
7. **Recordation.** Prior to the use of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk (i.e. Recorder's Office). In addition, upon any transfer or lease of the property during the term of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
8. **Grant Term.** This grant shall expire if the Development Agreement is revoked due to non-compliance. Otherwise, the CUP shall remain in full force and effect until such time as the university ceases operation or the portion of the Project Site occupied by the expanded university uses is redeveloped.
9. **Expiration.** This grant shall expire unless used as defined in the associated Development Agreement.
10. **Inspections.** The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Permittee to cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of or any other encumbrance on the property shall exempt the Permittee and/or property owner from compliance with these conditions and applicable regulations. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. The Permittee shall deposit with the County the sum of **\$4,700** which shall be placed in a performance fund and be used exclusively to reimburse LA County Planning for all expenses incurred while inspecting the premises to determine the Permittee's compliance with the conditions of this grant. The funds provide for **10** inspections.

Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of a UAS requires the consent of the Permittee pursuant to LA County Planning's UAS policy, which may be updated from time to time, and which shall be provided to the Permittee upon request.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Permittee shall be financially responsible and shall reimburse LA County Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be **\$470.00** per inspection, or the current recovery cost established by LA County Planning at the time any additional inspections are required, whichever is greater.

11. **Environmental Document Filing Fees.** Within five (5) working days from the day after the appeal period ends, May 18, 2026, the Permittee shall remit processing fees at the County Registrar-Recorder/County Clerk Office (i.e. County Clerk Office), payable to the County of Los Angeles, in connection with the filing and posting of a Notice of Determination ("NOD") for this project and its entitlements in compliance with section 21152 of the Public Resources Code. Unless a Certificate of Exemption is issued by the California Department of Fish and Wildlife pursuant to section 711.4 of the California Fish and Game Code, the Permittee shall pay the fees in effect at the time of the filing of the NOD, as provided for in section 711.4 of the Fish and Game Code, currently **\$3,043.75** (\$2,968.75 for a Negative Declaration or Mitigated Negative Declaration plus \$75.00 processing fee), or **\$4,198.50** (\$4,123.50 for an Environmental Impact Report plus \$75.00 processing fee). No land use project subject to this requirement is final, vested or operative until the fee is paid.
12. **Mitigation Monitoring and Reporting Program.** The Permittee shall comply with all mitigation measures identified in the Mitigation Monitoring and Reporting Program ("MMRP"), which are incorporated by this reference as if set forth fully herein.
13. **Covenant and Agreement.** Within thirty (30) days of the date of final approval of the grant by the County, the Permittee shall record a covenant and agreement, which attaches the MMRP and agrees to comply with the mitigation measures imposed by the CEQA Addendum for this project, in the Recorder's Office. Prior to recordation of the covenant, the Permittee shall submit a draft copy of the covenant and agreement to LA County Planning for review and approval. As a means of ensuring the effectiveness of the mitigation measures, the Permittee shall submit annual mitigation monitoring reports to LA County Planning for approval or as required. The reports shall describe the status of the Permittee's compliance with the required mitigation measures.
14. **Mitigation Monitoring and Reporting Program Deposit.** The Permittee shall deposit an initial sum of **\$6,000.00** with LA County Planning within thirty (30) days of the date of final approval of this grant in order to defray the cost of reviewing and

verifying the information contained in the reports required by the MMRP. The Permittee shall replenish the mitigation monitoring account if necessary until all mitigation measures have been implemented and completed.

15. **Revocation.** Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238 (Modifications and Revocations). Failure of the Permittee to cease any development or activity not in full compliance shall be a violation of these conditions and may result in revocation.
16. **County Fire Code.** All development pursuant to this grant shall comply with the requirements of Title 32 (Fire Code) of the County Code to the satisfaction of the County Fire Department.
17. **County Public Works Requirements.** All development pursuant to this grant shall comply with the requirements of the County Department of Public Works to the satisfaction of said department.
18. **Exhibit "A."** All development pursuant to this grant shall comply with the requirements of Title 22 (Planning and Zoning) of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of LA County Planning ("Director").
19. **Maintenance.** The Permittee shall maintain the subject property in a neat and orderly fashion. The Permittee shall maintain free of litter all areas of the premises over which the Permittee has control.
20. **Graffiti.** All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by LA County Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the Permittee shall remove or cover said markings, drawings, or signage within 48 hours, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

21. **Revisions to the Exhibit "A."** The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at

the public hearing, **an electronic copy of** a modified Exhibit “A” shall be submitted to LA County Planning by **June 28, 2026**.

22. **Subsequent Revisions to the Exhibit “A.”** In the event that subsequent revisions to the approved Exhibit “A” are submitted, the Permittee shall submit **an electronic copy of** the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit “A.” All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

PERMIT-SPECIFIC CONDITIONS - CONDITIONAL USE PERMIT

23. **Building Review.** The Permittee shall submit an application to LA County Planning for the review and approval of plans for each building or component of the project reflecting the final architectural design.
24. **Construction Limits.** No more than two individual buildings can be under construction at any one time and the two individual buildings under construction cannot be adjacent to, or adjoining, the same existing offsite residential area.
25. **No-Cost Programming.** The Permittee shall offer no cost participation in the Saturday Science Academy program for students that reside within a quarter mile radius of the Wellness and Education Campus project, subject to prequalification criteria.
26. **Public Events.** A public event plan shall be developed, to the satisfaction of the Director, addressing items including, but not limited to, frequency of events, event hours, set up and breakdown of events, expected number of attendees, event parking, locations of temporary restroom facilities, amplified sound plans, and lighting plans.
27. **Public Access to Campus Open Space and Walking Paths.** The Permittee shall provide public access to the university’s open space and walking paths; public access must be permitted during daylight hours.
28. **Public Access to Athletics Field and Facilities.** The Permittee shall develop a rental/reservation system, to the satisfaction of the Director, to allow public access to the athletic field and facilities, to be provided during the evening hours (6:00PM – 11:00PM) and on weekends, when not in use by the university.
29. **Public Access to Meeting Spaces.** The Permittee shall develop a rental/reservation system, to the satisfaction of the Director, to allow public access to ~~the~~ designated meeting spaces, to be provided during normal business hours (6:00AM – 11:00PM) seven days a week, when not in use by the university.
30. **Public Art.** The Permittee shall install no less than two (2) physical art installations which must be maintained as publicly accessible pursuant to the County’s Public Art in Private Development Ordinance ~~during normal business hours (6:00AM –~~

~~11:00PM) seven days a week.~~ Said installations shall be installed within 20 years of the date of final approval.

31. **Traffic Safety Improvement.** No later than the issuance of a certificate of occupancy for the parking structure, the Permittee shall provide funding for a Rectangular Rapid Flashing Beacon to be installed by the County at the intersection of Compton Avenue and 117th Street.
32. **Local and Targeted Worker Hiring Program.** The Permittee shall be subject to the Los Angeles County Local Hire and Disadvantaged Workers program.
33. **Community Workforce Agreement.** The Permittee shall enter into a Community Workforce Agreement for the parking structure portion of the project, as defined by the County's Community Workforce Agreement Policy.
34. **Campus Enrollment Limits.** This grant does not modify any ~~authorize an increase in the~~ existing enrollment limit.
35. **Construction Equipment.** During any construction, the Permittee shall ensure that the construction contractors use electric welders and construction equipment that have engines of 25 horsepower or greater and that comply with USEPA Tier 4 Final non-road engine standards.
36. **Exterior Lighting.** All campus lighting shall be shielded and oriented downward to prevent light trespass to adjacent, non-university parcels. Athletic field lighting must be movement activated and/or time-limited outside of daylight hours. Athletic field lighting shall be limited to a maximum height of 73 feet.
37. **Drought Tolerant Landscaping.** All landscaping, plants, and trees must be native, or non-invasive and drought tolerant, and must be appropriate within the natural Willowbrook habitat.
38. **Electric Vehicle Charging Spaces.** The Permittee shall provide electric vehicle chargers and parking spaces in compliance with all applicable regulations at the time of building permit issuance.
39. **On-Campus Housing.** ~~The proposed~~ On-campus housing facilities shall only be made available exclusively to university students, staff, and faculty. If demand is insufficient to fill all units within the staff and faculty housing building, the University may make available vacant units pursuant to a preference program prioritizing the local healthcare and education workforce, subject to review and approval by the Director, and consistent with applicable State and federal law. If any units are made available to the general public, the Permittee shall obtain the necessary County Code Title 22 entitlement(s) approval prior to making the first such unit available via the preference program, or such other entitlement as may be required under the then-applicable code, to ensure compliance with affordable housing requirements, including the level of affordability mandated by State law and County ordinance in effect at the time of application submittal.

40. **County Department of Public Works Conditions.** The Permittee shall comply with all conditions set forth in the attached County Public Works Department letter dated January 15, 2026.
41. **County Fire Department Conditions.** The Permittee shall comply with all conditions set forth in the attached County Fire Department letter dated December 17, 2025.
42. **County Department of Public Health Conditions.** The Permittee shall comply with all conditions set forth in the attached County Department of Public Health letter dated April 3, 2024.

Attachments:

- Exhibit D-1 Mitigation Monitoring Program (pages 5-1 to 5-5)
- Exhibit D-2 Public Works Department Letter dated January 15, 2026.
- Exhibit D-3 Fire Department Letter dated December 17, 2025.
- Exhibit D-4 Public Health Department Letter dated April 3, 2024.



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

MUNTU DAVIS, M.D., M.P.H.
County Health Officer

MEGAN McCLAIRE, M.S.P.H.
Chief Deputy Director

LIZA FRIAS, REHS
Director of Environmental Health

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April 03, 2024

TO: Edward Rojas
Supervising Regional Planner
Department of Regional Planning

Attention: Bryan Moller

FROM: Charlene Contreras *cc*
Director, Community Protection Branch
Department of Public Health

**SUBJECT: CONDITIONAL USE PERMIT (CUP) REQUEST
CASE: RPPL2023004092
1667 E. 118th STREET LOS ANGELES CA 90059**

Thank you for the opportunity to review the application and project located at the subject property. The applicant proposes to demolish an existing school and developing a new Wellness Center consisting of four affordable multifamily housing buildings, affordable senior housing building, faculty/staff housing buildings, office building, athletic building, athletic field, and 8-story parking structure.

Public Health recommend clearance of the aforementioned project. This is conditioned by the current use of public water and wastewater systems. The applicant provided a water "Will Serve" letter from Liberty Utilities dated December 13, 2023. Also, provided a sewer "Will Serve" letter from Los Angeles County Sanitation Districts dated March 27, 2024. Any change of methods for the provisions of potable water and sewage disposal shall invalidate this approval.

- Public Health conditions for this project have been met as of the date of this letter. Public Health recommends the clearance of the aforementioned project.
- Public Health requires that the conditions or information requested below are addressed prior to agency approval; therefore, the Department **DOES NOT** recommend clearance of this project until the following conditions are met:

1. Community Protection Branch: Environmental Hygiene

Please Note: The following are general requirements for Noise and Air Quality recommendations for the proposed project.

The applicant shall abide by the requirements contained in Title 12, Section 12.08.390, 12.08.440, 12.08.530, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com).

1.1 Exterior Noise

Ordinance:

12.08.390 Exterior Noise Standards

No person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards (See Table 1):

Exterior Noise Standards, dBA						
Area	Duration	Std # 1 = L50	Std # 2 = L25	Std # 3 = L8.3	Std # 4 = L1.7	Std # 5 = L0
		30min/hr	15min/hr	5 min/hr	1 min/hr	At no time
Residential	7 am – 10 pm	50	55	60	65	70
	10 pm – 7 am	45	50	55	60	65
Commercial	7 am – 10 pm	60	65	70	75	80
	10 pm – 7 am	55	60	65	70	75

Table 1. Std= Standard dB that may not exceed the cumulative period

1.2 Construction Noise

Ordinance:

12.08.440 Construction Noise

Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

A. Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment shall not exceed:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 7:00 p.m.	75 dBA	80 dBA	85 dBA

Table 2. Std = Standard dB that may not exceed

B. Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment shall not exceed:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 7:00 p.m.	60 dBA	65 dBA	70 dBA

Table 3. Std = Standard dB that may not exceed

1.3 Community Noise

Ordinance:

12.08.530 Residential air conditioning or refrigeration equipment

Operating or permitting the operation of any air conditioning or refrigeration equipment in such a manner as to exceed any of the following sound levels is prohibited (See Table 4).

Measuring Location	Units Installed on or after January 1, 1980, dBA
Any point on neighboring property line, 5 feet above grade level, no closer than 3 feet from any wall.	55
Center of neighboring patio, 5 feet above level, no closer than 3 feet from any wall.	50
Outside the neighboring living area window nearest the equipment location, not more than 3 feet from the window opening, but at least 3 feet from any other surface.	50

Table 4: dBA levels not to be exceeded on the neighboring property

1.4 Findings

1.4.1 Exterior noise

Surrounding the subject property are single/multi-family residences, Charles Drew University, a parking structure, and the 105 freeway. Noise levels were measured using a sound level meter on the southern sidewalk of the subject property of 117th St on November 1, 2023, to determine background noise levels.

The background noise level results exceeded the noise standards (See Table 5). As a result, the background noise levels become the exterior noise standard.

Based on the proposed site plan and findings, noise generated from the proposed project (i.e., common area, athletic field, trash pickup, vehicle idling, exhaust, and car alarms) would likely not exceed the exterior noise standards due to:

1. the subject property's operational noise would not violate the residential noise standard because the background noise levels at the residential properties were above the ambient.
2. the common outdoor area is surrounded by the buildings.
3. the athletic field is within the campus, surrounded by three buildings and a parking structure.
4. residential parking is underground.
5. the staff parking structure on 117th St, adjacent to the 105 freeway will attenuate freeway noise to the subject project.
6. the staff parking structure will have a 20" - 8" setback from the nearest single-family residence, providing a buffer from vehicle noise.

Exterior Noise Standards, dBA – Industrial											
Area Background Results	Duration	Std # 1 = L50		Std # 2 = L25		Std # 3 = L8.3		Std # 4 = L1.7		Std # 5 = L0	
		30min/hr	Result	15min/hr	Result	5 min/hr	Result	1 min/hr	Result	At no time	Result
Residential: 1667 E 118th Street Los Angeles, CA 90059	3:41 pm – 4:41 pm	50	56.8	55	58.3	60	61.0	65	65.4	70	72.5

Table 5. Std = Standard dB that may not exceed the cumulative period

1.4.2 Construction Noise

Due to the proximity and the scope of the project, construction noise, such as demolition and grading, may impact the adjacent single-family residents.

1.4.3 Community Noise

The site plan indicates that the Heating, Ventilation, and Air Conditioning (HVAC) units will be located on the 4th or 5th floor rooftop. Based on the proposed distance and elevation of the HVAC units to the adjacent property, it does not appear that they will exceed standard #1 of 50 dBA.

1.5 Recommendation

1.5.1 Comply with requirements contained in Title 12, Section 12.08.390, 12.08.440, 12.08.530, Noise Control Ordinance for the County of Los Angeles.

The following activities should be minimized or monitored closely to avoid noise impact to neighbors.

1. Operation of stationary/nonstationary equipment, especially motorized.
2. Use of a PA System
3. Special events
4. Car alarms
5. Trash collection

Consider using noise-attenuating building materials and designs which will provide an interior CNEL of 45 dBA.

1.5.2 Construction Noise

Noise mitigation measures should be applied to reduce construction noise and to comply with Title 12, 12.08.440 – Construction Noise. Noise mitigation strategies may include but are not limited to:

1. Installation of a temporary sound barrier at the proposed project site to mitigate noise impacts on all surrounding properties.
2. All construction equipment shall be equipped with the manufacturers' recommended noise muffling devices, such as mufflers and engine covers. These devices shall be kept in good working condition throughout the construction process.
3. All construction equipment shall be properly maintained and tuned to minimize noise emissions.
4. Stationary noise sources (e.g., generators and compressors) shall be located as far from residential receptor locations as is feasible.

1.5.3 Community Noise

Ensure HAVC units do not exceed 50 dBA at the neighboring property line.

1.5.4 Air Quality Recommendation

During grading or excavation activities if applicable, application of dust control measures to minimize fugitive dust is recommended.

Edward Rojas
April 03, 2024
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Fugitive dust can result in worker and public exposure to fungal spores such as *Coccidioides immitis*, which can cause Coccidioidomycosis (Valley Fever). Adhere to applicable Air Quality Management District regulations.

For questions regarding above comments, please contact Makkaphoeum Em of Public Health, Environmental Hygiene Program at (626) 430-5201 or mem@ph.lacounty.gov.

If you have any other questions or require additional information, please contact Veronica Aranda of Public Health, Planning & Land Use Liaison at (626) 430-5201 or varanda@ph.lacounty.gov.

CC:va

DPH_CLEARED_1667 E. 118th STREET LOS ANGELES CA 90059_RPPL2023004092_04.03.2024