

February 17, 2015

**Via Email and Regular Mail:**

To: Honorable Gilbert Cedillo, CD1 ([councilmember.cedillo@lacity.org](mailto:councilmember.cedillo@lacity.org))  
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Subject: The Lexington CF 15-0036/CPC 2006-9797  
Psomas Job No. 1LAP060100

Honorable Councilmembers:

At the February 10, 2015 Planning and Land Use Management Committee, Doug Haines testified voicing concern about the feasibility of Mitigation Measure I-2 for the Project, which proposed a fair share contribution towards widening and providing two left turn lanes and a separate through/right-turn lane for the US-101 freeway northbound off ramp at Santa Monica Blvd. is to widen. However, as explained in the Final EIR in response to Comment No. A5-5, during preparation of the RPDEIR, a new mitigation measure (Mitigation Measure I-12) was identified in consultation with LADOT that would fully mitigate the project impact at the US 101 northbound off-ramp/Santa Monica Boulevard intersection, and that would be fully funded by the Project. With implementation of Mitigation Measure I-12, the Project impact at this intersection would be reduced to a less than significant level and Mitigation Measure I-2 from the Draft EIR was no longer required.

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Mr. J. H. McQuiston also submitted a letter objecting to the Council's approval of the proposed General Plan Amendment from "Limited Manufacturing" to "General Commercial," and the related Zone Change. Contrary to Mr. McQuiston's claims, nothing in the General Plan Framework, the Hollywood Community Plan, or any General Plan Element mandates that the City of Los Angeles preserve "this particular industrial land" (i.e. the Project site) for industrial use. The General Plan Framework expressly recognizes that "[a] s indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies." General Plan Framework Policies such as Policy 3.14.6 expressly provide for the re-designation of marginal industrial lands for alternative uses by amending the community plans. The Project proposes such a community plan amendment.

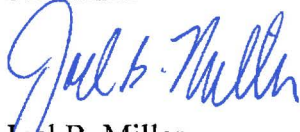
The Project site has been extensively studied in conjunction with the proceedings related to the applicant's proposal and the criteria discussed in Policy 3.14.6 have been considered throughout the process. The Project site is not occupied by industrial uses. Rather, it is presently occupied by nightclubs along Santa Monica Boulevard and Lexington Avenue, storage/warehouse buildings, a self-storage business, and an occasionally utilized special event space at Santa Monica and Las Palmas. Given these existing commercial uses, the Council may properly find that it is unlikely that the Project site would be converted to industrial uses in the future, and the Council may properly find that the public welfare would be better served by allowing the conversion of the Project site, which is located along Santa Monica Boulevard (which is a commercial and public transit corridor) to residential and mixed-use. The Council may properly find that heavy truck traffic from industrial use of the site would conflict with, and adversely impact, residential uses north of Santa Monica Boulevard, particularly along residential streets such as Lexington Avenue. The Council may properly find that infrastructure north of Santa Monica Boulevard provides limited access to freeways, and that industrial traffic would need to travel through the surrounding residential and commercial areas in order to access the freeway system; creating conflicts with, and adverse impacts upon, such residential and commercial uses. In addition, City planning studies have properly recognized that areas such as the Project site north of Santa Monica Boulevard would provide a desirable transitional buffer between multi-family uses to the north and the predominantly industrial uses south of Santa Monica Boulevard. Furthermore, the Council may find that the public welfare would be served by the conversion of the Project site to mixed-use residential in that it will provide housing opportunities to support the nearby Media District south of Santa Monica, infuse the area with life, and consequently reduce crime which has long plagued the Project area. There is no substantial evidence that permitting residential mixed-use of the Project site will adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts.

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Similarly, there is no substantial evidence that permitting the Project site's development with residential mixed-use will create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas because the Project site is not used for industrial use presently. Moreover, the Hollywood Community Plan recognizes the primary industrial uses in the Hollywood Community Plan area are entertainment and media-related uses rather than manufacturing uses. Because many modern entertainment uses (for example, the classification of digital and electronic production and post-production) do not give rise to the impacts associated with what are considered traditional industrial uses, the Hollywood Community Plan encourages review and revision of the Zoning Code relative to their classification to enable them to be conducted in other in addition to industrial zones (for example, general commercial zones). By allowing these activities to be conducted in areas in addition to industrial zones, a much larger amount of land is being made available for entertainment and media-related uses throughout the City.

Sincerely,

**PSOMAS**



Joel B. Miller  
Vice President/Principal

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