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City Plan Case No.: DIR-2014-1517-DRB-
SPP-COA-1A
Environmental Case No: ENV-2014-1518-CE
Council File: 15-0057

Council District No. 5

Honorable City Council City of Los Angeles
City Hall, Room 395
Los Angeles, CA 90012

Dear Councilmembers:

APPEAL OF ENV-2014-1518-CE

The purpose of this memorandum is to provide additional information regarding the City's determination that the subject project is Categorically Exempt from environmental review, pursuant to the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC).

Background

The subject property was built in 1951 in the mid-century modern architectural style. It is a Locally Significant Historic-Cultural Resource, identified in the Westwood Specific Plan; as such, any work involving the building is subject to the Certificate of Appropriateness provisions of the LAMC applicable to designated historic properties. The original tenant was Bullock's Westwood, a department store. Approximately 50 years later, the building was converted to a multi-tenant retail building, as it exists today. Currently, the property is not listed as an historic resource on any other City, State or national registry.

The subject property includes a three-story retail building and attached three-level parking structure. The ground floor fronts Weyburn Ave., with the concave façade and entry to Target, and an adjacent two-lane driveway to the ground level of the parking structure. The first level fronts Tiverton, with a two-lane driveway to the parking structure; however, there is no entry to the retail building and no corresponding first level within the retail structure. The second level fronts Le Conte Ave., with the entry to Ralphs and a two-lane driveway to the second level of the parking structure. The second level is the top level of the parking structure, and the parking presents as a surface parking lot next to the retail building. The third level is the roof over the

retail building, and includes surface parking and a roof-top building at a portion of the southwest corner of the rooftop, which houses a childcare center. Access to the parking is via a two-lane ramp at the Le Conte Ave. facade that traverses in front of the east-facing façade of the retail building as it ascends and then connects to the roof-level parking of the retail building.

Project Description

The owner proposes the addition of a large passenger elevator because the elevator installed at the time of the conversion to a multi-tenant building has proven to be too small to meet the needs of the tenants and their customers. The elevator will be placed within the four-level parking structure at the edge attached to the east façade of the retail structure. It will serve all four levels of the parking structure as well as the two levels of retail and the roof level of the retail building. It will also have entry/exit doors on two sides, and will accommodate four shopping carts at a time. At the roof, the elevator housing will extend approximately 10 feet taller than the existing elevator tower, in order to enclose the elevator and provide several feet of required access space above the elevator. A machine room will be adjacent to the elevator housing. In addition, the placement of the elevator is adjacent to an existing stair that is within the retail structure, and the owner proposes to extend this stair to the roof. At the roof, the housing for the stair will be the same height as the existing elevator housing.

Environmental Finding

The West Los Angeles Area Planning Commission determined that the project is exempt from environmental review pursuant to Article III, Section 1 of the City's CEQA Guidelines (City's CEQA Guidelines), specifically Class 11, Category 6. This exemption category includes the construction or placement of minor structures accessory to (appurtenant to) existing commercial, industrial or institutional facilities. The proposed elevator meets these parameters. The project is also exempt pursuant to the following additional categories: (1) Class 1, Category 1 of the City's CEQA Guidelines applicable to interior or exterior alterations, remodeling, or minor construction of existing facilities where there will be negligible or no expansion of use; (2) State CEQA Guidelines Class 1 exemption for existing facilities (Guidelines Section 15301); (3) State CEQA Guidelines Class 2 for replacement or reconstruction of existing facilities (Guidelines Section 15302); (4) State CEQA Guidelines Class 3 for construction or conversion of small structures (Guidelines Section 15303); and (5) State CEQA Guidelines Class 31 exemption for restoration for rehabilitation of a historical resource (Guidelines Section 15331). The project meets the parameters of these additional exemptions. Finally, none of the exceptions to the categorical exemption apply so as to make the project ineligible to be exempt from environmental review pursuant to the PRC Section 15300.2. In particular, the project will not cause a substantial adverse change in the significance of the building as a historical resource.

A. City's CEQA Guidelines Class 11, Category 6 Exemption: Minor Accessory Structure

The elevator is accessory to the retail and parking structures. The elevator will be fully contained within the parking structure, and will serve all retail and parking levels. The elevator will not result in increased demand or trips that could have an impact on the environment. The purpose of the additional elevator is to serve the demand already planned for the retail and parking structures.

The elevator is a minor structure. The elevator is small compared to the length of the east elevation where it will be placed -- 14 feet wide along a 247-foot façade, or 0.6% of the facade. In addition, at the second parking level, the upper half of the elevator structure is obscured from view from the east by the parking ramp. At this level, the elevator structure is also visible from

the sidewalk at the north because the elevator sits within a portion of the pedestrian path from the sidewalk to the second entrance facing the parking area; however, the placement is deep into the site (approximately 100 feet in). The elevator and stair housing at the roof level of the retail building will be larger than that of the existing elevator, but will match the height and style of the existing elevator housing, with only the new elevator housing extending an additional 10 feet.

B. City's CEQA Guidelines Class 1, Category 1: Minor Construction to Existing Facilities

The City's CEQA Guidelines exempt minor alteration of existing structures where there is no expansion or only negligible expansion beyond the existing use. Here, the project does not expand the existing commercial uses. It involves minor construction to the existing building and is thus exempt.

C. State CEQA Guidelines 1, Category 1 Exemption: Existing Facilities

The key consideration in determining whether this exemption applies is whether the project involves "negligible or no expansion of an existing use." Here, the project is the construction of a new elevator in an existing facility. The new elevator would not expand existing use, but would instead involve a minor alteration to the existing building. Section 15301(a) is instructive as it provides as examples of exempt projects "interior or exterior alterations involving such things as interior partitions, plumbing and electrical conveyances." Further, pursuant to section 15301(e)(1), use of the Class 1 exemption is appropriate because the proposed project would not substantially increase the floor area of the building.

D. State CEQA Guidelines Class 2 Exemption: Replacement or Reconstruction of Existing Facilities

The Class 2 exemption applies to replacement and reconstruction of existing structures where the new structure will be located in the same site and will have substantially the same purpose and capacity as the structure to be replaced. Here, the proposed project reconstructs the existing building to add a new elevator. The location of the structure remains the same and the structure's purpose and capacity remain unchanged as a result of the project.

E. CEQA Guidelines Class 3 Exemption: New Construction or Conversion of Small Structures

The Class 3 exemption consists of new, small facilities or structures, including "[a]ccessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences." CEQA Guidelines 15303(e). The elevator is a new small structure appurtenant and accessory to the existing building.

F. CEQA Guidelines Class 31 Exemption: Limited Work Involving A Historic Resource

The Class 31 exemption applies to the maintenance, rehabilitation, reconstruction, or restoration of historical resources in the manner consistent with the Secretary of the Interior's Standards for the Treatment of Historical Properties with Guidelines for Preserving Rehabilitation, Restoring, and Reconstruction of Historic Buildings. The Standards identify 10 factors to consider and, upon weighing the factors, the project is consistent with the Standards.

The building has two primary frontages, at Weyburn Ave. on the south and at Le Conte Ave. on the north. At Weyburn Ave., the defining concave façade extends horizontally across the full façade. This façade contains the primary entrance for Target. At Le Conte Ave., display windows are placed on the low stone wall that lines the property edge at the sidewalk, steps

lead up to an outdoor patio and entrance to the retail space, and floor-to-ceiling glazing along the facade provides views and transparency to the retail space. This façade contains the primary entrance for Ralphs. Thus, the subject property has two front entries.

Both retail floors have second entrances adjacent to and accessed directly from parking areas. The Target ground floor retail space has an entrance from the ground floor parking level. The Ralphs second floor retail space has an entrance from the second parking level. Both of these entrances are secondary to the Weyburn Ave. and Le Conte Ave. because they are smaller and not as visible from the public view from the sidewalks surrounding the site.

Similarly, the second level east façade is secondary to the Weyburn Ave. and Le Conte Ave. facades. This façade is over-shadowed and partially obscured by the two-lane ramp to the roof parking, and is set back and separated from the surrounding sidewalks by the adjacent parking. Furthermore, this façade appears to be automobile-oriented in that the pedestrian path from the sidewalk at Le Conte Ave. along the facade is somewhat narrow and sandwiched between the vehicle ramp and the building.

Nonetheless, the second level east façade is comprised of important historic building materials, including the custom-designed decorative tiles that comprise a substantial portion of the façade cladding. The proposed elevator respects these historic elements and construction of the elevator would not damage these elements. As described in the Finding for the Certificate of Appropriateness, the work involved in installing the proposed elevator conforms to all of the Secretary of the Interior Standards for Rehabilitation.

G. CPR Section 15300.2: None of the Exceptions to the Exemptions Apply Here

Categorical Exemptions may not be applied under certain circumstances identified in Section 15300.2 of the Public Resources Code. These include: (a) Location; (b) Cumulative Impact; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources. The proposed project does not fall within any of these circumstances, as described here.

Location. The subject site is in an urban, developed area and there are no known sensitive areas that have been mapped by federal, state, or local agencies.

Cumulative Impact. The proposed scope of work is minor, and would not contribute to a cumulative impact. An elevator was installed as part of prior renovations. A second elevator and associated housing mirrors that of the existing elevator, and per the Conditions of Approval, the height of the housing will be minimized to what is required by the current building codes.

Significant Effect. There are no known unusual circumstances regarding the site and the structure whereby the proposed scope of work would result in a significant effect on the environment.

Scenic Highways. The subject site is not located within a Scenic Highway and does not involve scenic resources. Therefore, the scope of work would not have an impact on a state-designated Scenic Highway.

Hazardous Waste Sites. The subject site is not included on any official, published list of hazardous waste sites, per State of California Department of Toxic Substances Control EnviroStor Data Management System public website.

Historical Resources. As described above, the proposed scope of work will not involve any historic building materials and exterior cladding, will not significantly obstruct character-defining historic elements, and will not introduce new architectural elements that damage the historic significance of the site and architectural style. The elevator housing will be clad in white stucco in order to be in the background when viewed along the second level east façade. In addition, the elevator housing, machine room and stair housing at the roof parking over the retail building will be minimized in height, as described above, and will match the design of the existing elevator housing, including the design of the roof element at the entry/exit doors of the elevator and stairs. The new additions will be sufficiently differentiated from the old, but still compatible with the historic materials in order to protect the integrity of the structure.

Conclusion

Therefore, as described above, the City has determined that the subject project is Categorically Exempt from environmental review, pursuant to the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC).

MICHAEL J. LOGRANDE
Director of Planning

A handwritten signature in black ink, appearing to read "Faisal Roble". The signature is fluid and cursive, written over the printed name.

Faisal Roble
Principal City Planner