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March 31, 2016

The Honorable Jose Huizar, Marqueece Harris-Dawson,
Gilbert Cedillo, Mitchell Englander, and Felipe Fuentes
Los Angeles City Council Planning and Land Use Management Committee
200 North Spring Street
Los Angeles, California 90012

Via email to Sharon.dickinson@lacity.org

RE: Council File 15-0455-S1 (805-823 S. Catalina Street; 806-820 S. Kenmore Ave.)
April 5, 2016, PLUM Committee Hearing, Agenda Item No. 4

Dear Chair Huizar and Councilmembers Harris-Dawson, Cedillo, Englander, and Fuentes,

I write on behalf of Fix the City, Inc., a non-profit organization whose mission is to advocate for improved infrastructure and to ensure that the City of Los Angeles follows sound planning principles in permitting increased development projects in the City. The project at 805 S. Catalina Street is a poster-child for bad planning practices and *ultra vires* approvals by the City Council to override the unanimous disapproval (on three separate occasions) by the City Planning Commission.

In addition to our prior comments, submitted February 2, 2016 and March 22, 2016, Fix the City observes that the Findings for Approval of the proposed project are inadequate, inconsistent, and unsupported.

First, the findings satisfy neither Objective 16-2 of the Wilshire Community Plan, nor any of the related policies. The Wilshire Community Plan clearly requires that the City make certain findings prior to approving developments that increase density in the Wilshire Community Plan area; these findings are entirely absent from the Findings for Approval in this case.

The Wilshire Community Plan provides:

Objective 16-2

Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

Policies 16-2.1

No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations:

The transportation infrastructure serving the project site and surrounding area, specifically the Freeways, Highways, and Streets presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

Program: Decision-makers shall adopt findings with regard to infrastructure adequacy as part of their action on discretionary approvals of projects which could result in increased density or intensity.

The General Plan amendment and zone change required for approval of this project clearly brings the approval within the ambit of Policy 16-2.1. However, there are no findings at all relating to the transportation infrastructure in the Findings for Approval. The approval does not satisfy the requirements of the Wilshire Community Plan.

Nor would such findings be supportable based on the record before the City Council. Indeed, for the version of the project that was proposed and rejected by the Planning Commission in 2009—which included the essentially the same number of residential units and *less* commercial space than the current proposal – LADOT and the traffic study then provided by the applicant both acknowledged that the project’s increased traffic would specifically cause an impact to Kenmore Avenue. Moreover, the LADOT study noted that street dedication and widening might be required – there is no evidence that the City has investigated whether widening is required to mitigate the impacts of the increased traffic. The 2009 traffic study and LADOT review are attached for reference as Exhibit 1. In light of this information regarding the project’s impacts on local streets, the City cannot find that the transportation infrastructure serving the project has the capacity to serve the traffic that will be generated by the proposed project.

The findings for the project’s approval are also deficient in that they are not supported by the evidence before the City. The General Plan designation of “Regional Commercial” is not consistent with the purposes, intent, and provisions of the General Plan. The Framework Element establishes in Objective 3.10 the City’s policy to encourage the development of Regional Centers that are “compatible with adjacent land uses.” (Emphasis added.) The Framework Element explains that Regional Centers are either (1) areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages; (2) areas containing mid- and high-rise structures on large independent lots, set back from the property frontages; or (3) areas containing retail commercial malls. (Exhibit 2 contains the text of the applicable portion of the Framework Element.) The proposed project satisfies none of these criteria. The project’s frontage is *entirely* on local streets, and not on any secondary highways or arterial streets. The project is not on a large independent lot, nor is it set back from the property frontage. Nor is the project a retail commercial mall, or located near one. Indeed, the land use

patterns in the project area demonstrate the proper application of a Regional Center. Properties along Wilshire Boulevard, a secondary highway, are designated Regional Center. The only property with significant frontage off of Wilshire that is designated Regional Center also adheres to the Framework Element's description: the site of the former Ambassador hotel, with frontage along 8th St and Wilshire Boulevard, is a large independent lot where the structures (formerly a hotel, presently a school) are set back from the property line. There are *no* areas designated as Regional Commercial anywhere south of 8th Street in the Wilshire Community Plan. (The Wilshire Community Plan land use map is available for download at <http://cityplanning.lacity.org/complan/central/PDF/wilplanmap.pdf>.) The project's findings do not demonstrate consistency with the Framework Element or with the Wilshire Community Plan in the change of designation for these parcels that front solely on local streets and are not adjacent to any comparably designated parcels. The Regional Center designation is not consistent with adjacent land uses and is unsupportable.

The findings base their support for the project upon its location in a supposedly transit rich area. However, the Wilshire Community Plan *already* designed its plan designations to achieve the plan objective of "developing new housing in close proximity to regional and community commercial centers, subways stations, and existing bus route stops." (Objective 1-2.)¹ The Wilshire Community Plan provides that the Plan has "designate[d] a number of increased residential density in close proximity to the City's highest number of major public transit corridors, major bus route stops, and subway stations." (Policies 1-2.1, Program.) There is nothing provided in the findings to justify the massive departure from the orderly land use designations reflected in the Wilshire Community Plan for these few parcels. They are not closer to transit than other similarly situated parcels, and they are already zoned for medium high density, just like all neighboring parcels. Meanwhile, permitting a 27-story tower in the midst of one to six story buildings undermines Objective 1-3, "Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods."

The project also violated policy 1-3.4, to "locate access to major development projects so as not to encourage spillover traffic on local residential streets." The *only* access to this major, 27-story project is provided on two local streets. It was entirely *omitted* from the current Mitigated Negative Declaration that this traffic will have a significant impact on Kenmore Avenue.

The project also violates the Wilshire Community Plan's policies regarding new commercial development, which state that "New commercial uses should be located in existing established commercial areas or shopping centers." (Policies 2-1.1.)

The findings elsewhere specifically admit that the project does not conform to the City's land use goals and policies. The General Plan amendment treats the existing Wilshire Community Plan as if it has no significance, as if the designations on the map are simply bargaining chips. The City can plan for greater density in the Koreatown area if it desires. But the purpose of the General Plan is to comprehensively assess the planning of the City, and the lot by lot amendment proposed here undoes that process, to vast detriment of neighboring residents.

¹ Relevant portions of the Wilshire Community Plan are attached as Exhibit 3.

The findings in support of the zone and height district change are also unsupported. The findings contend that the public necessity is served by the increased density permitted by the zone change that will allow for the creation of more residential units. However, the finding provides no information regarding the number of units that could be created under the R4 zoning, so the decisionmakers cannot make an informed decision about the need for and the effects of the zone change. The finding that constructing a 27-story tower in the middle of a block with one to six story structures is “good zoning practice,” is particularly ludicrous, in light of the admission that the development is a “higher density and scale than the immediately surrounding uses.” This zone change is spot zoning at its worst – imposing less restrictive zoning on a small number of properties within a sea of zoning that is more restrictive, to the great detriment of neighboring residents who will now have a 27-story tower looming over their low-rise homes. There is simply no basis in “good zoning practice” for this kind of up-zoning, and nothing in the findings that states that the proposed development is somehow consistent with policies designed to reduce dependence on the automobile justifies this kind of give-away, particularly without providing the decisionmakers with information on the number of units that could be constructed under the existing zoning in a reasonably-sized project.

Nor does the record contain any basis for the statement that the project would serve the general welfare. The findings contend that the project will “help meet local housing needs,” but there is no information in the record on what the local housing needs and why housing constructed in accordance with existing zoning would not meet those needs. Note particularly that there is *no affordable housing* provided in this development. The developer is contributing a mere \$1 million to affordable housing, so this project will not go very far to meet the need for *affordable housing*. The findings contend that imposing a 27-story tower in the middle of a low-rise neighborhood will “enhance the sense of community in the area by providing a unique development that contributes to the revitalization of the neighborhood.” This statement is entirely conclusory: Does an over-tall, over-large structure really “enhance” the sense of community? What evidence in the record shows that this project will revitalize a neighborhood?

For these same reasons, the City fails to satisfy the findings required for conditional use and site plan review. All of these findings require a demonstration that the project is compatible with adjacent and nearby land use. That finding simply lacks any factual basis given the repeated acknowledgment by the Director of Planning and the City Planning Commission that the scope and scale of the project far exceed the scope and scale of any nearby project, the testimony of neighbors, as well as the opposition of the Koreatown Neighborhood Council.

Finally, the findings for the “adjustments” to allow reduced sideyard setbacks are just plain erroneous. The findings rely on the “frontage of the project along 8th St, which contains commercial use at the ground floor level,” to justify pedestrian oriented access with a reduced setback. But the project *has no frontage at all on 8th Street*. The project’s only frontage is on the local residential streets, Catalina and Kenmore. The reduced setbacks are *parallel* to 8th Street and will simply permit the giant structure to be constructed closer to both the homes and businesses on 8th Street and the homes directly south of the project on Catalina and Kenmore. Similarly, the other findings in support of the adjustment misstate the purpose of the reduction in sideyards – it is not to address the frontage on Catalina Street, but rather to *reduce* the separation

Honorable City Councilmembers
March 31, 2016
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between this project and its neighbors. Unlike legislative actions, these quasi-judicial approvals require the City Council to base its decision on substantial evidence, which is entirely absent from this record.

In all, the approval process for this project is jam-packed with error, faulty assumptions, and baseless findings. The applicant never appealed the revised project's 2014 denial for the project before the Council, so it never should have advanced to City Council last spring, and it should not be there now. The 2009 project was appealed but was received and filed by PLUM and cannot be used as the basis for approving the project. In fact, it appears to only have been advanced through wholly improper means. The City Council lacks jurisdiction to override the CPC for these reasons.

The environmental review for this huge project is cursory and inadequate. There were no findings, nor could there be, of sufficient infrastructure capacity with regard to first responders or transportation.

Finally, the General Plan amendment was not properly initiated by anyone with authority to initiate an amendment, and the General Plan amendment and zone change are a prime example of arbitrary and capricious legislative zone changes.

Do not approve this project for it will prove to be yet another example of poor land use actions by the City Council that, once again, will be reversed in court.

Cordially,

A handwritten signature in black ink, appearing to read "Beverly Grossman Palmer". The signature is fluid and cursive, with the first name "Beverly" being the most prominent.


Beverly Grossman Palmer

EXHIBIT 1

CITY OF LOS ANGELES
INTRA-DEPARTMENTAL CORRESPONDENCE8th & Catalina
DOT Case No. CEN 06-3710

Date: April 25, 2008

To: Hadar Plafkin, City Planner
Department of City Planning

From: 
Mike Bagheri, Transportation Engineer
Department of Transportation

Subject: **TRAFFIC IMPACT STUDY FOR THE PROPOSED RESIDENTIAL
CONDOMINIUM DEVELOPMENT LOCATED ON THE SOUTHWEST
CORNER OF CATALINA STREET AND 8TH STREET (ENV-2006-7211-
EAF)**

The Department of Transportation (DOT) has reviewed the traffic study, prepared by traffic consultant Katz, Okitsu & Associates, dated May 9, 2007, and the supplemental analysis dated April 2, 2008 for the proposed residential condominium development located on the southwest corner of Catalina Street and 8th Street (Attachment 1). The study analyzed nine (9) intersections and three (3) residential street segments and determined that none of the study intersections and one street segment would be significantly impacted by the project related traffic (Attachment 2). Except as noted, the study adequately evaluated the project related traffic impacts on the surrounding community.

DISCUSSION AND FINDINGS**Project Description**

The project proposes to construct 300 residential condominiums and 5,000 square feet of retail space along the frontage of the project at 805 South Catalina Street near the Central Los Angeles New Learning Center #1 (former Ambassador Hotel). The proposed access to the project will be via two driveways: one on Kenmore Avenue and one on Catalina Street. The build out year for the project is expected to be in 2009.

Trip Generation

The project will generate approximately 1,935 daily trips with 137 trips in the AM peak hour and 57 trips in the PM peak hour (Attachment 3).

Significant Traffic Impact Location

The proposed project will significantly impact the residential street of Kenmore Street south of 8th Street.

PROJECT REQUIREMENTS

A. Neighborhood Traffic Management Plan (NTMP)

The study indicated that the Kenmore Street south of 8th Street residential street segment surrounding the project may experience adverse impacts from the related trips and it recommended that the developer contribute towards a NTMP. DOT supports the concept of a NTMP. The exact amount of funding will be determined by DOT to cover the cost to plan, develop and implement traffic calming measures. The plan should include a separate amount of monies for implementation of a preferential parking district if requested by the neighborhood and found warranted by DOT. The actual amount of funding for the NTMP and preferential parking program are still to be determined.

B. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.

C. Highway dedication and street widening requirements

8th Street is classified as a Secondary Highway, which requires 35-foot half-width roadway on a 45-foot half-width right-of-way.

Catalina Street is classified as a Local Street, which requires 20-foot half-width roadway on a 30-foot half-width right-of-way.

Kenmore Street is also classified as a Local Street.

It appears that highway dedication and widening may be required for streets fronting the proposed project. The developer must check with the Bureau of Engineering's (BOE) Land Development Group to determine the highway dedication, street widening and sidewalk requirements for the project.

D. Parking Analysis

The traffic study did not include a parking analysis. The developer should check with the Department of Building and Safety on the number of Code required parking spaces needed for the project.

E. Driveway Access

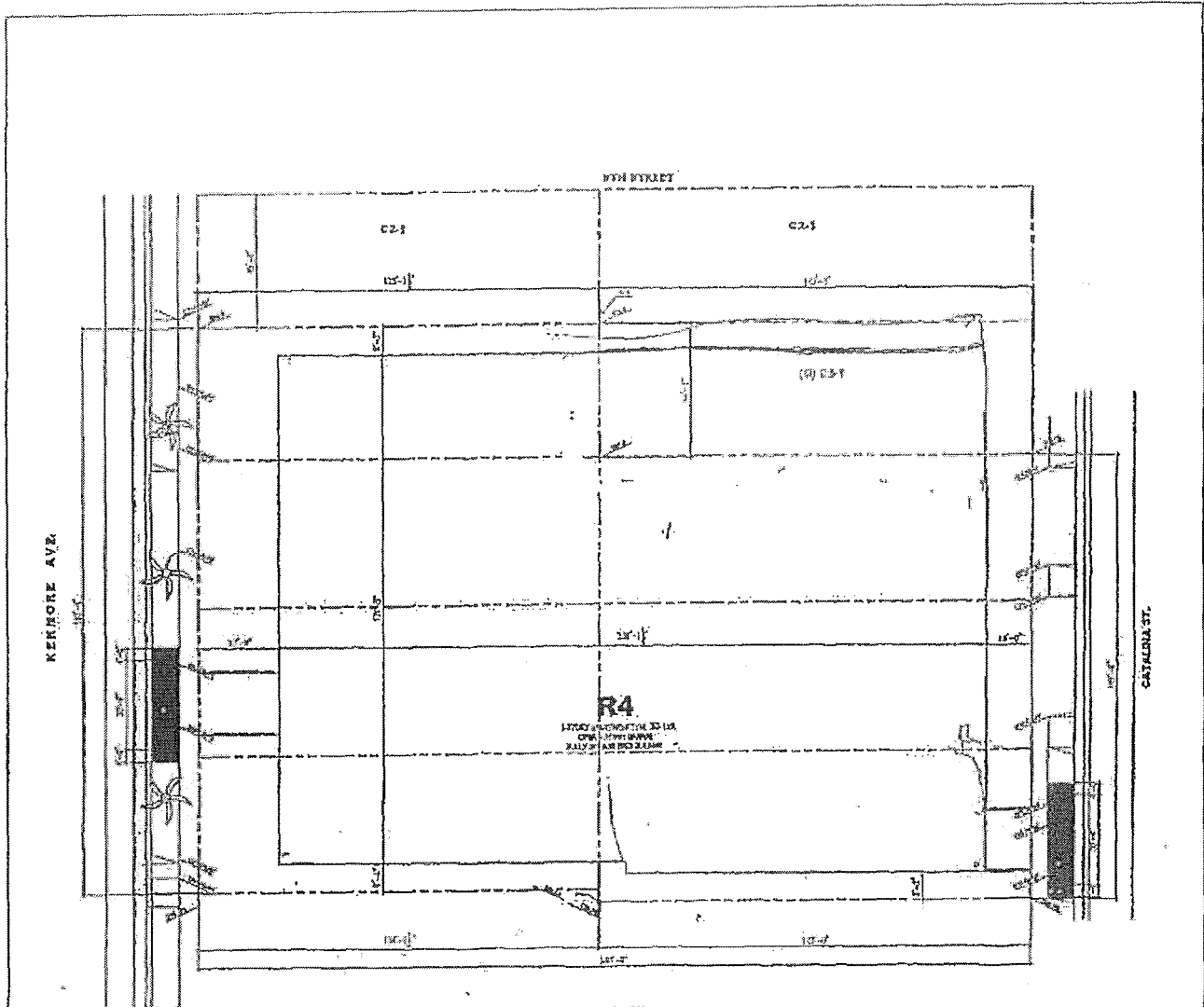
The review of this study does not constitute approval of the driveway access and circulation scheme. Those require separate review and approval and should be coordinated as soon as possible with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024) to avoid delays in the building permit approval process. In order to minimize and prevent last minute building design changes, it is imperative that the applicant, prior to the commencement of building or parking layout design efforts, contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans to avoid any unnecessary time delays and potential costs associated with late design changes. All driveways should be Case 2 driveways and 16 feet and 30 feet for one-way and two-way operations, respectively. Any proposed gates should have 40' minimum reservoir space from the property line. All delivery truck loading and unloading shall take place on-site with no trucks backing into or out of the project site from any adjacent street.

If you have any questions, please contact Eileen Hunt of my staff at (213) 972-8481.

Attachments

cc: Wendy Fraticelli, Council District No. 10
Jeannie Shen, Hollywood-Wilshire District, DOT
Taimour Tanavoli, Citywide Planning Coordination Section, DOT
Carl Mills, Central District, BOE
Jasper Domingo, KOA Corporation

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SITE PLAN
SCALE: 1/8" = 1'-0"



Katz, Okitsu & Associates
Planning and Engineering

8th and Catalina Residential Project

Figure 2
Project Site Plan

LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTION¹

<u>Level of Service</u>	<u>Volume/Capacity Ratio</u>	<u>Definition</u>
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	FAILURE. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

¹Source: Transportation Research Board, Interim Materials on Highway Capacity, Transportation Research Circular No. 212, January 1980.

SIGNIFICANT TRANSPORTATION IMPACT CRITERIA

1. A transportation impact on an intersection shall be deemed "significant" in accordance with the following table except as otherwise specified in a TSP, ICO or CMP:

SIGNIFICANT TRANSPORTATION IMPACT

<u>Level of Service</u>	<u>Final V/C Ratio</u>	<u>Project-Related Increase In V/C</u>
C	> 0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E, F	> 0.900	equal to or greater than 0.010

2. A local residential street shall be deemed significantly impacted² based on an increase in the projected average daily traffic (ADT) volumes:

<u>Projected Average Daily Traffic with Project (Final ADT)</u>	<u>Project-Related Increase in ADT</u>
0 to 999	16% or more of final ADT*
1,000 or more	12% or more of final ADT
2,000 or more	10% or more of final ADT
3,000 or more	8% or more of final ADT

*For projects in West Los Angeles Transportation Improvement and Mitigation Specific Plan area, use 120 or more trips.

²Source: Traffic Infusion on Residential Environment (TIRE) Index developed by D.K. Goodrich and modified by LADOT for Los Angeles City conditions.

Preliminary Levels of Service Analysis
8th Street Condominium

Weekday AM Peak Hour									
Intersection		Existing Conditions (Year 2007)		Future Base Conditions (Year 2009)		Future Base with Project Conditions (Year 2009)		Diff.	Signif?
		V/C	LOS	V/C	LOS	V/C	LOS		
1.	Normandie Avenue & Wilshire Boulevard	0.596	A	0.710	C	0.713	C	0.003	No
2.	Catalina Avenue & Wilshire Boulevard	0.514	A	0.605	B	0.638	B	0.033	No
3.	Vermont Avenue & Wilshire Boulevard	0.740	C	0.876	D	0.880	D	0.004	No
4.	Irolo Avenue & 8th Street	0.801	D	0.866	D	0.868	D	0.002	No
5.	Catalina Avenue & 8th Street	0.566	A	0.498	A	0.537	A	0.039	No
6.	Vermont Avenue & 8th Street	0.718	C	0.757	C	0.760	C	0.003	No
7.	Irolo Avenue & James Wood Boulevard	0.696	B	0.765	C	0.778	C	0.013	No
8.	Vermont Avenue & James Wood Boulevard	0.612	B	0.669	B	0.685	B	0.016	No
9.	Irolo Avenue & San Marino Avenue	0.651	B	0.719	C	0.731	C	0.012	No

Preliminary Levels of Service Analysis
8th Street Condominium

Weekday PM Peak Hour									
Intersection		Existing Conditions (Year 2007)		Future Base Conditions (Year 2009)		Future Base with Project Conditions (Year 2009)		Diff.	Signif?
		V/C	LOS	V/C	LOS	V/C	LOS		
1.	Normandie Avenue & Wilshire Boulevard	0.673	B	0.865	D	0.872	D	0.007	No
2.	Catalina Avenue & Wilshire Boulevard	0.644	B	0.760	C	0.781	C	0.021	No
3.	Vermont Avenue & Wilshire Boulevard	0.791	C	0.973	E	0.975	E	0.002	No
4.	Irolo Avenue & 8th Street	0.903	E	0.998	E	1.007	F	0.009	No
5.	Catalina Avenue & 8th Street	0.772	C	0.720	C	0.755	C	0.035	No
6.	Vermont Avenue & 8th Street	0.733	C	0.779	C	0.780	C	0.001	No
7.	Irolo Avenue & James Wood Boulevard	0.901	E	0.989	E	0.997	E	0.008	No
8.	Vermont Avenue & James Wood Boulevard	0.714	C	0.780	C	0.785	C	0.005	No
9.	Irolo Avenue & San Marino Avenue	0.967	E	1.057	F	1.063	F	0.006	No



Project Traffic Impacts

Table 12 provides a comparison of weekday study scenarios within the existing and future periods. Traffic impacts created by the project are calculated by comparing the increase in percentage of project traffic against the future base traffic volumes with the threshold mentioned above. The overall traffic impacts created by the proposed Project, and the determination of a significant impact, are provided in the right three columns of the table.

Table 12 – Determination of Project Impacts on Residential Streets

Street Segment	Time Period	Base Volumes				Proposed Project				
		Existing	Ambient Growth	Related Projects	Future Base	Project Only	Future with Project	Increase (%)	Significant Impact Criteria	Significant Impact
1 Catalina Street north of 8th Street	ADT	10,259	2.0%	775	11,239	716	11,955	6.4%	8.0%	No
2 Kenmore Street south of 8th Street	ADT	1,333	2.0%	0	1,360	387	1,747	28.5%	12.0%	Yes
3 James Wood Boulevard east of Catalina Street	ADT	7,625	2.0%	535	8,313	387	8,700	4.7%	8.0%	No

As indicated in Table 12, the project would impact Kenmore Street in this study effort.

4. Project Traffic

This section defines the traffic that would be generated by the proposed Project in a three-step process including trip generation, trip distribution, and trip assignment.

A. Project Trip Generation

As indicated in Section 1, the proposed project includes 300 dwelling units of condominiums with 5,000 square feet of retail along the frontage of the project. Table 7 summarizes the project trip generation rates that were utilized, and the trip generation calculated from these rates. Trip generation for the proposed project land use was calculated by utilizing rates published in ITE's *Trip Generation*, 7th Edition. Based on the proposed 300 dwelling units of condominiums and 5,000 square feet floor area of retail, and the rates found in *Trip Generation*, the proposed project would generate approximately 1,935 daily trips of which 137 and 167 trips would occur during the morning and afternoon peak hours, respectively.

Table 7 – Project Trip Generation Estimates

Land Use	Intensity	Units	Daily	AM Peak Hour			PM Peak Hour		
				Total	In	Out	Total	In	Out
Trip Rates [1]									
Condominium (ITE Code 230)	-	DU	5.86	0.44	17%	83%	0.52	67%	33%
Specialty Retail (ITE Code 814) [2]	-	KSF	44.32	1.33	60%	40%	2.71	44%	56%
Pass-By Trip Reduction			10%		10%		10%		10%
Internal Trip Reduction			10%		10%		10%		10%
Estimated Trips									
Condominium (ITE Code 230)	300	DU	1,758	132	22	110	156	105	51
Specialty Retail (ITE Code 814)	5,000	KSF	222	7	4	8	14	6	8
Pass-By Trip Reduction			(22)	(1)	(1)	0	(1)	(1)	(1)
Internal Trip Reduction			(22)	(1)	(1)	0	(1)	(1)	(1)
TOTAL TRIPS			1,935	137	24	119	167	110	57

[1] Trip generation rates were from ITE Trip Generation Manual, 7th Edition, unless otherwise noted.

[2] Morning trip generation rates were derived from San Diego Association of Governments (SANDAG).

B. Project Trip Distribution

Trip distribution is the process of assigning the direction of travel to and from a project site. Trip distribution is dependent upon the land use characteristics of the project and the general locations of land uses to which project trips would originate or terminate. Project trip distribution was based on the geographic distribution of population from which the residents, patrons and employees of the proposed development would originate or terminate as well as knowledge of development trends in the area, local and sub-regional traffic routes, and regional traffic flows.

Figure 17 illustrates the intersection trip distribution percentages that were utilized to assign project traffic volumes.

EXHIBIT 2

Chapter 3 - Land Use

GOALS, OBJECTIVES AND POLICIES

ISSUE TWO: USES, DENSITY, AND CHARACTER

REGIONAL CENTERS

Definition

Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents.

They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities.

Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and well being necessary for ensuring public nighttime use of transit facilities.

They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in the community plan. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services.

Physically, the regional centers are generally characterized by three forms of development

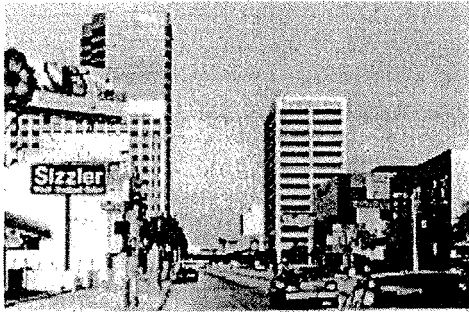
1. Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages (e.g., Wilshire and Hollywood Boulevards). The intensity of activity and incorporation of retail uses in the ground floor of these structures should induce considerable pedestrian activity.
2. Areas containing mid- and high-rise structures sited on large independent lots, set back from the property frontages (e.g., Warner Center and most of Century City). Though inhibited by the separation of structures, it is encouraged that buildings and sites be designed to improve pedestrian activity within the center.
3. Areas containing retail commercial "malls," characterized by low- and mid-rise buildings clustered around common pedestrian areas. It is encouraged that these buildings be sited and designed to improve their relationships to their principal street frontages, enhancing pedestrian activity.

GOAL 3F

Mixed-use centers that provide jobs, entertainment, culture, and serve the region.

Objective 3.10

Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.



Regional Centers: Sherman Oaks



Century City

Policies*Uses and Density*

3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" and densities/intensities of uses permitted in any area shall be identified in the community plan.

3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.

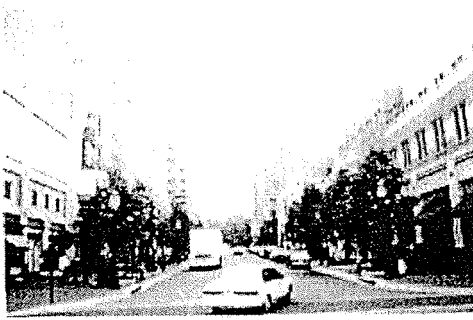
Design and Development

3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to be adjacent to residential uses at the edges of the centers. (P1, P18, P24)

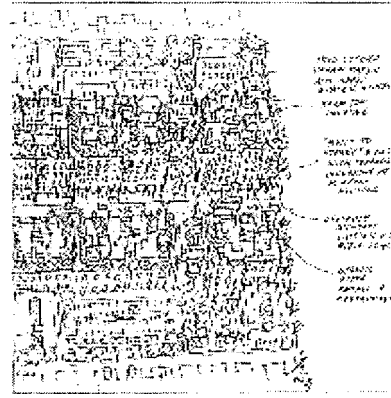
3.10.4 Provide for the development of public streetscape improvements, where appropriate. (P30)

3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches and trees.

3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and safety.



Regional center incorporating retail, offices, and housing (on upper floors) with enhanced pedestrian character. buildings sited along sidewalk, pedestrian-amenities)



Characteristics of regional centers: buildings on street frontage, inclusion of small parks, retail and restaurants located on the ground floor.

[Return to Commercial Centers](#) | [Chapter Contents](#) | [Advance to Downtown Centers](#)

EXHIBIT 3

WILSHIRE

Community Plan

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ACTIVITY LOG

COMMUNITY PLAN

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- II. Function of the Community Plan
- III. Land Use Policies and Programs
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- V. Urban Design

www.lacity.org/PLN (General Plans)

A Part of the General Plan - City of Los Angeles

1-1.2 Promote neighborhood preservation in all stable residential neighborhoods.

Program: With the implementation of the Wilshire Community Plan, all discretionary actions, Specific Plans, and any community and neighborhood residential projects must be consistent with Wilshire Community Plan recommendations.

Program: The Neighborhood Preservation Program administered by the City's Housing Department provides financial assistance rehabilitating Single Family homes and Multiple Family housing.

Program: Provide loans to owners of small residential buildings (one to four units) to correct code violations through the Homeowners Encouragement Loan Program (HELP), administered by the City's Housing Department.

1-1.3 Provide for adequate Multiple Family residential development.

Program: The Community Plan Map, identifies land where Multiple Family residential development is permitted.

1-1.4 Provide for housing along mixed-use boulevards where appropriate.

Program: Create Mixed Use Districts along targeted boulevards identified in the General Plan Framework to support the construction of mixed use development

Program: Implement a Mixed Use District in the Wilshire Center Area, including the area generally bounded by Third Street, Hoover Street, Olympic Boulevard, and Western Avenue.

Objective 1-2

Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.

Policies

1-2.1 Encourage higher density residential uses near major public transportation centers.

Program: To accommodate the anticipated population increase to the Wilshire Community Plan Area by the year 2010, the Plan designates a number of increased residential density city blocks, in close proximity to the City's highest number of major public transit corridors, major bus route stops, and subway stations.

Objective 1-3

Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.

Policies

- 1-3.1 Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.

Program: Develop Community Design Overlays (CDO) and companion Streetscape Plans for the Miracle Mile Regional Center (generally from Highland on the east to La Cienega on the west); for Third Street (between Fairfax and La Cienega); for Fairfax Avenue (between Third and Rosewood, and between Olympic and Pico); and Melrose Avenue (between Van Ness and Hoover). Design Guidelines for corresponding Multiple Family Residential Development are listed in Chapter V.

- 1-3.2 Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.

Program: Develop Historic Preservation Overlay (HPOZ) districts for the Windsor Square and Hancock Park neighborhoods, and other neighborhoods as appropriate including the Miracle Mile and Beverly-Fairfax neighborhoods, with community involvement and support.

Program: In recognition of the historic and intended park-like settings of many neighborhoods such as Hancock Park and Windsor Square, facilitate and support application and enforcement of existing regulations that establish minimum setbacks and limit fences, walls and hedges.

- 1-3.3 Promote the preservation and rehabilitation of individual residential buildings of historic significance

Program: Facilitate the declaration of Historic-Cultural Monuments through the Cultural Affairs Department on a building-by-building basis. Raise awareness within the community of this and other public and private resources available to protect and rehabilitate historic structures.

Program: Inventory neighborhoods in the Pico/Normandie area and identify possible candidates for Historic-Cultural Monument status, and neighborhoods for possible inclusion in an Historic Preservation Overlay District as a means to preserve architectural diversity and built history.

- 1-3.4 Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.

Program: Incorporate Neighborhood Traffic Mitigation Plans (NTMP) for major development and provide LADOT assistance to neighborhoods in design of NTMP's.

Objective 1-4

Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.

Policies

- 1-4.1 Promote greater individual choice in type, quality, price and location of housing.

Program: The plan promotes greater individual choice by allocating adequate lands in the Plan Area for a variety of residential densities, and for the promotion of housing in mixed-use projects.

- 1.4-2 Ensure that new housing opportunities minimize displacement of residents.

Program: Decision-makers should adopt displacement findings in any decision relating to the construction of new housing.

- 1.4-3 Encourage multiple family residential and mixed use development in commercial zones.

Program: The community plan identifies areas for mixed use development in commercial zones, as illustrated on the General Plan Framework Map.

Program: Create and implement mixed-use districts along boulevards as designated in the General Plan Framework.

COMMERCIAL

Commercial land uses designated in the Wilshire Community Plan consist of 1,129 acres or 12 percent of the total plan acreage. In 1996, the Wilshire area contained approximately 40,004,300 million square feet of commercial development. Approximately 20,520,100 million square feet (51 percent) was devoted to office use and 19,484,200 million (49 percent) to retail use.

Most of the commercial development can be categorized within four concentrations based on the general orientation of uses: Regional, Community, General, and Neighborhood. The General Plan Framework Element identifies and sets forth criteria of these designations.

**REGIONAL
COMMERCIAL**

Four major areas designated in the Plan as Regional Commercial include:

Wilshire Center Regional Commercial Center; the Miracle Mile Regional Commercial Center; the Beverly Center-Cedars Sinai Regional Commercial Center; and the Koreatown Regional Commercial Center. They total approximately 270 acres.

Wilshire Center Regional Commercial Center

The Wilshire Center Regional Commercial Center is approximately 100 acres in size. It includes a dense collection of high rise office buildings, large hotels, regional shopping complexes, churches, entertainment centers, and both high-rise and low-rise apartment buildings.

Community Plan Land Use Diagram.

**MIXED USE
BOULEVARDS**

The Mixed Use Boulevard concept encourages cohesive commercial development integrated with housing.

These structures incorporate retail, office and/or parking on the lower floors and residential units on the upper floors. The mixed use concept also accommodates separate commercial and residential structures in the same block.

The intent of mixed use development is to provide housing in close proximity to jobs and services, to reduce vehicular trips, traffic congestion and air pollution, to provide rental housing, and to stimulate vibrancy and activity in pedestrian-oriented areas.

Mixed use development may also provide community facilities such as libraries, meeting rooms, post offices, senior centers, or child day care facilities.

The Wilshire Community Plan aims to encourage well planned and integrated mixed use developments in designated commercial areas which have the potential to benefit from pedestrian oriented development. To that end, the plan calls for the creation of Mixed-Use Districts (MUs) and the policies, incentives, and design standards contained therein.

The plan supports applicable commercially zoned portions of the following as mixed-use boulevards and districts, as shown on the General Plan Framework map:

- 3rd Street (From La Cienega to Fairfax, From Western to Vermont)
- 8th Street (From Western to Vermont)
- Beverly Blvd (From Fairfax to Gardner, From Western to Vermont)
- Fairfax Ave (From Wilshire to Beverly)
- La Brea Ave (From Wilshire to Beverly)
- La Cienega (From 18th to Olympic)
- Larchmont Blvd (From Melrose to Beverly)
- Olympic Blvd (From Crenshaw to Hoover)
- Pico Blvd (From Crest to Hoover)
- Robertson Blvd (From Gregory to 18th)
- Vermont Ave (From Beverly to Pico)
- Western Ave (From Melrose to Pico)
- Wilshire Center (Commercial areas within the area bounded by 6th Street, Vermont Avenue, 8th Street, and Western Avenue)

GOAL 2

ENCOURAGE STRONG AND COMPETITIVE COMMERCIAL SECTORS WHICH PROMOTE ECONOMIC VITALITY AND SERVE THE NEEDS OF THE WILSHIRE COMMUNITY THROUGH WELL-DESIGNED, SAFE AND ACCESSIBLE AREAS, WHILE PRESERVING HISTORIC AND CULTURAL CHARACTER.

Objective 2-1

Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services

within existing commercial areas.

Policies

- 2-1.1 New commercial uses should be located in existing established commercial areas or shopping centers.
- 2-1.2 Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand alone residential development by adhering to the community plan land use designations.
- 2-1.3 Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.

Program: Coordinate with the City Clerk's Office to assist businesses in obtaining technical and financial assistance for the formation of Business Improvement Districts (BID) and of other programs from the City of Los Angeles.

Objective 2-2

Promote distinctive commercial districts and pedestrian-oriented areas.

Policies

- 2-2.1 Encourage pedestrian-oriented design in designated areas and in new development.

Program: Establish Community Design Overlay Districts (CDOs), and Pedestrian Oriented Districts (PODs), which have design policies in designated areas to ensure the creation of pedestrian-friendly commercial development. Develop a CDO for the Miracle Mile area.

Program: Implement the Design Guidelines in Chapter 5, as they apply to commercial projects and projects located within Neighborhood Districts.

- 2-2.2 Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community meeting rooms, senior centers, police sub-stations, and/or other appropriate human service facilities as part of the project.
- 2-2.3 Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.

Objective 2-3

Enhance the visual appearance and appeal of commercial districts.

Policies

Highway standards (4 lanes).

This improvement would continue and facilitate the provision of consistent Secondary Highway standard lanes, and realign Normandie Avenue at Olympic Boulevard with a larger radius curve to improve traffic flow.

- **Vermont Avenue**, from Beverly Boulevard to Council Street; Improve and widen within existing right of way, to be consistent with Major Class II Highway standards (6 lanes with parking prohibition) and to provide adequate flow of traffic.
- **Vermont Avenue**, from Melrose Avenue to Oakwood Avenue; Improve and widen right of way, to be consistent with Major Class II Highway standards (6 lanes with parking prohibition).

This would improve traffic operations by increasing the capacity for turning movements (additional left-turn lanes) from Vermont Avenue on northbound and southbound 101 Hollywood Freeway on-ramps.

Policies

16-1.2 Highways and Streets should be developed in accordance with standards and criteria contained in the Transportation Element of the General Plan and consistent with the City's Standard Street Dimensions.

In some cases exceptions may exist where significant environmental issues and/or sound planning practices may warrant alternate standards, consistent with street performance standards and traffic flow volume capacity requirements.

Program: Implement the Transportation Element.

Roadway widening along not fully improved streets is required under LAMC 12.37.

This method minimizes disruption to neighboring businesses and residents and will improve traffic circulation over the life of the plan as redevelopment occurs.

Objective 16-2

Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

Policies

16-2.1 No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations:

The transportation infrastructure serving the project site and surrounding area, specifically the Freeways, Highways, and Streets presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

Program: Decision-makers shall adopt findings with regard to infrastructure adequacy as part of their action on discretionary approvals of projects which could result in increased density or intensity.

HISTORIC AND CULTURAL RESOURCES

CULTURAL AND HISTORIC MONUMENTS

The Wilshire Community Plan Area has a wealth of City-designated Historic-Cultural Monuments, with over 60 such monuments within the plan area. A complete listing of locations and descriptions can be found on the City website (www.lacity.org) within the Cultural Affairs Department. An appendix of all Historic-Cultural Monuments within the plan area has also been prepared as part of this community plan.

Some of the most notable Historic-Cultural monuments along Wilshire Boulevard include:

The Bullock's Wilshire Building, the I. Magnin & Company Building, the May Company Wilshire Building, the Wilshire Theater, the Farmer's Market, the First Congregational Church, the Wilshire Boulevard Temple, the Wilshire Boulevard Christian Church Building, the Wilshire United Methodist Church, the First Baptist Church of Los Angeles, the Ebell Club of Los Angeles Building, the El Rey Theater, and the Ambassador Hotel.

The Los Angeles Cultural Affairs Department in coordination with the California Institute of the Arts, has also identified Wilshire Boulevard as the Historic Wilshire Neon Corridor, home to LUMENS, a Living Urban Museum of Electric and Neon Signs, the most concentrated area of original Art Deco neon signs in the world, with over 150 recognized (over 40 have been relit), along the Wilshire Corridor.

These groups have produced "Neon at Night, A Guide to Neon Lights Along the Wilshire Corridor".

GOAL 17

PRESERVE AND RESTORE CULTURAL RESOURCES, NEIGHBORHOODS AND LANDMARKS WHICH HAVE HISTORICAL AND/OR CULTURAL SIGNIFICANCE.

Objective 17-1

Ensure that the Wilshire Community's historically significant resources are protected, preserved, and/or enhanced.