

8 December 2015

City Clerk, Room 395
City Hall
200 North Spring Street
Los Angeles, CA 90012

Date: 12/08/2015
Submitted in PLUM Committee
Council File No: 15-1387
Item No. 3
Deputy: Comm from Public

Re: VTT-72932-SL-2A
CD 2

Of the many negative impacts this project will have on our immediate neighborhood, I would like to focus on safety. My issues are based on logic and common sense with an eye to the future - the future being once this project is completed and occupied - once the developer is long gone.

Blix Street has a tremendous amount of foot traffic - walkers, joggers, folks walking babies in strollers, walking dogs, in addition to bikers, skaters and children simply going from one house to another - all in the street because we have no sidewalks and no street lights for that matter.

We have been seeing an increase in cut through traffic as density increases in the surrounding area due to the high rate of development on Riverside Drive. Drivers dangerously speed through our inadequately signed intersections and through our streets to race to a signal at Beck Avenue on to Riverside or to avoid a signal on Colfax and Riverside.

Riverside is already well know for its high accident rate and traffic. Occupants of this project will therefore want to enter Riverside at the Beck signal. The addition of this project will no doubt add dramatically to the existing hazardous cut through problem on our street.

Additionally, because the minimum parking requirement is inadequate for this project, over-flow parking will take place on Blix Street. Who'd want to park on Riverside, already well known for its high rate of car break-ins.

This real and projected parking situation on Blix will narrow the walkable portion of the street putting folks (especially children) at great risk of the real and projected increased speeding cut-through traffic, again created by the density of this project.

This and so many other present and future consequences of density created by out of control development in our city will hopefully be thought better of.

Babette Wilk
11565 Blix Street
Valley Village, CA 91602



#3

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INFORMATION
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VENICE COASTAL ZONE SPECIFIC PLAN
DIRECTOR OF PLANNING
SPECIFIC PLAN INTERPRETATION (REVISED)

August 14, 2014

CASE NO: DIR-2014-2824-DI
SPECIFIC PLAN INTERPRETATION
CEQA: ENV-2004-2691-CE
Location: Venice Coastal Zone Specific Plan
Council District: 11
Community Plan Area: Venice
Land Use: Various
Zone: Various
Appeal Period Ends: August 29, 2014

Initiated by:
Director of Planning

Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.7.H and the Venice Coastal Zone Specific Plan (Ordinance No. 175,693), I hereby approve:

A Specific Plan Director's Interpretation that clarifies the relationship between Section 12.22.C.27 of the LAMC, established by the Small Lot Subdivision Ordinance (No. 176,354), and the Venice Coastal Zone Specific Plan. The revised Director's Interpretation is intended to: (1) prevent small lot projects from exceeding densities otherwise allowed in the Specific Plan on individual lots; (2) highlight where conflicts between the LAMC and the Venice Coastal Zone Specific Plan exist and uphold the Specific Plan regulations where applicable; and (3) outline a review process for new small lot projects in the Venice Coastal Zone Specific Plan Area which takes into account the density, parking, and setback regulations of the Specific Plan. As set forth herein, this Director's Interpretation shall supersede the previous interpretation issued by the City Planning Commission (on appeal) on February 12, 2010 as Case Number DIR-2008-4703-DI-1A, and shall be applicable only within the Venice Coastal Zone Specific Plan Area.

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AUTHORITY

Pursuant to LAMC Section 11.5.7.H, Interpretations of Specific Plans, the Director of Planning has the authority to interpret specific plans where there is a lack of clarity in the meaning of the regulations. Insofar as the Small Lot Subdivision Ordinance was adopted after the Specific Plan, an interpretation is necessary to identify areas of potentially conflicting provisions in the two ordinances and to allow for small lot subdivisions in Venice in a manner that is consistent with the intent and provisions of the Venice Coastal Zone Specific Plan. The Venice Coastal Zone Specific Plan contains provisions which are unique to each of ten subareas and each type of underlying zone within.

BACKGROUND

The Small Lot Subdivision Ordinance (No. 176,354) became effective on January 31, 2005 as Section 12.22.C.27 of the LAMC in order to permit lots in multi-family zones (including RD, R3, R4, R5, RAS, P and C) to be subdivided into smaller parcel sizes than would normally be permitted, as long as they comply with the density provisions established by both the zoning and the Los Angeles General Plan. Small Lot projects are not permitted in single-family zones. The ordinance is a smart-growth strategy to promote infill development of underutilized land in multi-family and commercial zones. By reducing minimum lot size requirements, the ordinance enables fee-simple ownership of single-family homes on smaller lot areas, resulting in buildings with compact building footprints. The ordinance stipulates that subdivisions resulting from the Small Lot Ordinance cannot increase the density of the underlying zone or the allowable height of structures within the zone. On January 29, 2014, an Advisory Agency Policy was issued along with Small Lot Design Guidelines. All projects filed after February 1, 2014 (see Attachment D) are required to comply with or meet the intent of the 2014 Small Lot Design Guidelines. The Policy states that the Guidelines are to be used in conjunction with any adopted Specific Plan, but shall not supersede adopted Specific Plan procedures or standards.

The Venice Coastal Zone Specific Plan was established in 1999 (Ordinance No. 172,897) and substantially revised in 2004 (Ordinance 175,693). The primary objective of the Specific Plan is to protect, maintain, enhance and, where feasible, restore the overall quality of the Coastal Zone environment and its natural and man-made resources. The Specific Plan regulates all development, including: uses, height, density, setbacks, buffer zones, parking, and other development standards in order for new construction and modifications to existing buildings to be compatible in character with the community and provide for the consideration of aesthetics, scenic preservation and enhancement, and to protect environmentally sensitive areas.

As with all development regulations of Chapter 1 of the LAMC that are generally applicable to all zones, the application of the Small Lot Ordinance can be made more or less restrictive within Specific Plans and other types of zoning overlay districts, particularly where Specific Plans tailor zoning densities and other development regulations to unique geographic areas and circumstances. Because the Venice Coastal Zone Specific Plan was written prior to the adoption of the Small Lot Subdivision ordinance, and the Citywide ordinance did not specifically exempt the Venice Coastal Zone Specific Plan area, the way the ordinance would relate to the Specific Plan could not be anticipated at the time the Small Lot Subdivision Ordinance was adopted and consequently a Director's Interpretation was necessary to clarify their relationship.

A Director's Interpretation for the Venice Coastal Zone Specific Plan was previously issued on January 26, 2009. That decision was appealed. The appeal cited concerns over parking requirement calculations and affordable housing provisions in the Specific Plan and was heard

by the City Planning Commission on June 11, 2009. On February 12, 2010, the City Planning Commission's determination became final, in which the Commission granted the appeal in part and sustained the January 26, 2009 determination of the Director of Planning with modifications, adding clarifying language regarding Beach Impact Zone parking requirements and requiring Replacement Affordable Units to be located onsite within a development. The City Planning Commission also adopted a Categorical Exemption (ENV-2004-2691-CE) as the environmental clearance for the action.

The 2010 interpretation stemmed from a policy to encourage the development of small lot projects citywide, including the Venice community. The purpose of the interpretation was to provide a framework for small lot subdivisions in the Venice Coastal Zone Specific Plan Area and to allow small lot projects in Venice to utilize similar incentives to those built into the Citywide Small Lot Subdivision Ordinance. At the time the interpretation was written, small lot development was seen as a way of introducing more affordable, fee-simple single-family homes into the Venice community – an area where housing prices have outpaced most of the City and where affordable housing is scarce.

ANALYSIS

The February 12, 2010 Director's Interpretation favored the Citywide Small Lot Ordinance over the local Specific Plan. Small lot subdivision projects in Venice were interpreted to be individual single-family lots resulting from a small lot subdivision. To this end, the interpretation held small lot projects in Venice to the single-family parking standards of the Specific Plan and applied the relevant Specific Plan procedures relative to density, parking, yards, access and setbacks to the lots resulting from the subdivision rather than the original lot in its pre-subdivision state. The rationale for this approach is that after a subdivision, each resulting lot becomes a single-family property, and should be subject to single-family property requirements and restrictions. In actuality, though small lot projects cannot increase the allowable density of a subdivision as a whole, they can result in increases in building massing beyond what was anticipated or contemplated in the Specific Plan for individual lots

Upon further examination of the purposes and intent of the Venice Coastal Zone Specific Plan, namely Section 4 which discussed the relationship of the Venice Coastal Zone Specific Plan to other provisions of the Municipal Code, the plan states that "Wherever provisions in [the Venice Coastal Zone Specific Plan] differ from provisions contained in Chapter 1 of the LAMC, (with regard to use, density, lot area, floor area ratio, height of buildings or structures, setbacks, yards, buffers, parking, drainage, fences, landscaping, design standards, light, trash and signage) this Specific Plan shall supersede those other regulations. Whenever [the Venice Coastal Zone Specific Plan] is silent, the regulations of the LAMC shall apply." The Specific Plan anticipated that there may be provisions of the Code which conflict with its policies, and expressly overrides other zoning provisions where there are conflicts. LAMC Section 12.22.C.27 is one such provision of the LAMC that contains different regulations.

The new interpretation more closely aligns with the spirit and intent of the Venice Coastal Zone Specific Plan development standards by applying the Specific Plan regulations to each individual lot within a small lot project, which will result in small lot developments that adhere to the density, setback and parking regulations of the Venice Coastal Zone Specific Plan where they are applicable. Together with the Small Lot Design Guidelines issued by the Advisory Agency in January 2014 (Attachment D), the revised Director's Interpretation is expected to yield small lot projects of a more compatible and proportional building footprint than is currently allowed under the 2010 Director's Interpretation, consistent with the purposes of the Venice Coastal Zone Specific Plan.

Changes in the Interpretation

The original Director's Interpretation attempted to reconcile Small Lot provisions in the Code with the Venice Coastal Zone Specific Plan by granting some flexibility for the Director to apply both the Citywide Small Lot Ordinance incentives and the Venice subarea zoning provisions. The previous Director's Interpretation applied single-family standards in the Venice Coastal Zone Specific Plan to individual lots resulting from a small lot subdivision, whereas the new interpretation applies multi-family standards in the Specific Plan to the small lot development as a whole (i.e. the pre-subdivision parcel).

The overall allowable density has not changed as a result of the revised interpretation as both the current and former interpretations emphasize that Small Lot projects may not increase the density allowed in the Subarea, or underlying zone, if applicable. However, the new interpretation strictly interprets the lot area, density, parking, and setback provisions of the Specific Plan to apply to newly created lots in Venice and applies these development standards to individual lots as well as the small lot development as a whole.

The new interpretation also provides greater clarity regarding Small Lot application procedures in the Venice Coastal Zone Specific Plan – Small Lot subdivision applications and Director of Planning approvals for Venice Coastal Zone Specific Plan cases must be reviewed simultaneously to ensure that density regulations governed by the Specific Plan are adhered to in small lot approvals.

Below is a summary of the revised interpretation. All other provisions of the 2010 Director's Interpretation shall be unchanged:

- **General Provisions:** The new interpretation underscores the fact that the Venice Coastal Zone Specific Plan's provisions override other LAMC provisions where differences exist, for example, with respect to density, parking, and yard provisions in certain Subareas.
- **Parking:** The 2010 Director's Interpretation allowed small lot projects with resulting lots containing only a single dwelling unit to utilize the single-family dwelling parking provisions in Section 13 of the Specific Plan. The new interpretation requires the small lot project, as a whole, to provide parking pursuant to the multiple dwelling provisions in Section 13 which require either two or two and one-quarter parking spaces per dwelling unit depending on the width of the lot.

As an example, using single-family development standards in the Venice Coastal Zone Specific Plan, projects are required to provide two parking spaces as a baseline, or three spaces in the Silver Strand and Venice Canals Subareas. In contrast, multi-family projects on lots greater than 40 feet wide are required to provide two spaces per dwelling unit plus additional guest parking at a rate of one space for each four or fewer dwelling units. Under the previous Director's Interpretation, small lot projects could utilize single-family parking standards, which would result in reduced parking requirements relative to other multi-family project types, such as condominiums and apartments, within multi-family zones. The new interpretation brings parking standards for Small Lot projects in the Venice Coastal Zone Specific Plan into conformance with parking requirements for other types of multi-family projects such as apartments and condominiums.

- **Setbacks:** The new Director's Interpretation requires that, notwithstanding setback provisions in the Small Lot Subdivision Ordinance and the underlying zone, each individual resulting lot within a new small lot subdivision must be consistent with Specific Plan setback requirements for individual lots, where limitations are set. If a small lot project is proposed in Subareas where provisions are silent with regard to setback limitations, the requirements of the Small Lot Subdivision ordinance and the underlying zone shall apply. For example, the Ballona Lagoon (Grand Canal) East Bank Subarea of the Venice Coastal Zone Specific Plan requires a 15-foot average setback along any lot line which separates the lot from the east bank of the Grand Canal. The Subarea also requires side yard setbacks measuring 3.5 feet in width between all resulting Small Lots. This is in addition to the Small Lot Subdivision Ordinance which requires a 5-foot setback between the Small Lot project boundary and non-Small Lot neighboring lots.
- **Lot Area and Density:** The revised Director's Interpretation states that the number of dwelling units permitted in the Small Lot project may not exceed the density permitted by zoning of the original, pre-subdivided lot. The interpretation further elaborates that in Subareas of the Venice Coastal Zone Specific Plan containing density regulations which are more restrictive than the LAMC, the project as a whole and each newly resulting lot must meet the density standards of the Subareas. It is anticipated that with this change, the number of units allowed per lot in certain subareas may be reduced from that allowed under the Municipal Code due to the restrictive nature of the Venice Coastal Zone Specific Plan.

GENERAL REQUIREMENTS AND PRINCIPLES

The Director's Interpretation is as follows:

1. Where provisions in the Venice Coastal Zone Specific Plan differ from provisions contained in Chapter 1 of the Los Angeles Municipal Code (LAMC), the Venice Coastal Zone Specific Plan shall supersede those other regulations. Where provisions are silent in the Venice Coastal Zone Specific Plan, regulations of the Los Angeles Municipal Code (LAMC) apply, including Section 12.22 C.27.
2. APPLICABILITY OF SMALL LOT ORDINANCE IN THE VENICE COASTAL ZONE SPECIFIC PLAN: Notwithstanding LAMC Section 12.22.C.27 (Small Lot Ordinance), small lot projects within the Venice Coastal Zone Specific Plan shall adhere to multi-family development procedures and standards established within the Specific Plan. Additionally, any standards which further restrict lot area, density, setbacks, stepbacks, lot coverage, open space, driveway access and/or parking shall apply to the entire subdivided area, including individual resulting small lots.

Applications for small lot developments within the Venice Coastal Zone Specific Plan shall be subject to Director of Planning review pursuant to Section 8 of the Specific Plan, either "Director of Planning Sign-Off" or "Project Permit Compliance Review", depending on the location of the project and number of dwelling units proposed. Project Permit Compliance review shall be completed concurrent with any application for a subdivision.

3. PARKING: Required parking for subdivision projects shall be based on the parking requirements for multiple dwelling uses, based on the width of the pre-subdivided lot, pursuant to Section 13.D of the Venice Coastal Zone Specific Plan. Beach Impact Zone Parking, if applicable, shall be provided pursuant to Section 13.E of the Specific Plan, consistent with multi-family parking requirements.
4. DRIVEWAYS: Pursuant to the Venice Coastal Zone Specific Plan, all driveways and vehicular access shall be from alleys, when present. When projects abut an alley, each newly resulting subdivided lot shall be accessible from the alley and not the street. Exceptions may be made for existing structures where alley access is infeasible.
5. SETBACKS: Front, rear, and side yard setbacks and lot coverage and open space requirements within each lot resulting from a small lot subdivision shall be consistent with the Specific Plan, where it sets limitations, if applicable. In the Ballona Lagoon West Bank and Ballona Lagoon (Grand Canal) East Bank Subareas, side yard setbacks on all lots within a small lot project must be 3.5 feet in width, consistent with Sections 10.A.2.b(4) and 10.B.2.b.3(d) of the Specific Plan. This requirement is in addition to the 5-foot setback where the lot abuts another lot not created pursuant to the small lot subdivision ordinance, pursuant to LAMC Section 12.22.C.27(e).
6. MULTIPLE LOTS: Existing lots may be subdivided into multiple small lots so long as the averaged newly resulting lot size is equivalent to the minimum requirement for "lot area per dwelling unit" established for each residential zone in the LAMC, except where minimum lot sizes per dwelling unit are further restricted in the Specific Plan, such as in the Marina Peninsula (D), North Venice (F), and Oakwood, Millwood, Southeast Venice (G) Subareas. For example, a 4500 square foot parcel in the RD1.5 zone may be subdivided into a maximum of 3 small lots with one measuring 1000 square feet, one

measuring 1800 square feet and one measuring 1700 square feet, given that the average lot size is 1500 square feet. However, if the same 4500 square foot parcel in the RD1.5 zone is located in the North Venice (F) or Oakwood, Millwood, Southeast Venice (G) Subareas, each lot must not be less than 1,500 square feet per dwelling unit.

7. DENSITY: The density of combined newly created lots shall not exceed the density permitted by zoning of the original, pre-subdivided lot, which is the "lot area per dwelling unit" restriction for each subarea and each zone, as determined by the Venice Coastal Zone Specific Plan. Where the Specific Plan is silent with respect to density, the density shall be based on the underlying zone in the Los Angeles Municipal Code.

APPEAL PERIOD

The Determination in this matter will become effective 15 days after the date of mailing, unless an appeal therefrom is filed with the Department of City Planning. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this grant and received and receipted at a public office of the Department of City Planning on or before the prescribed date or the appeal will not be accepted. Department of City Planning public offices are located at:

Figueroa Plaza
201 North Figueroa Street, #400
Los Angeles, CA 90012
(213) 482-7077

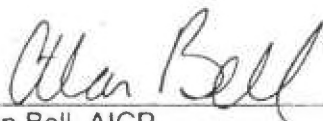
Van Nuys City Hall
6262 Van Nuys Blvd, 3rd Floor
Van Nuys, CA 91401
(818) 374-5050

The applicant is further advised that all subsequent contact with this office regarding this grant must be with the decision-maker who acted on the case. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished by appointment only, in order to assure that you receive service with a minimum amount of waiting. You should advise any consultant representing you of this requirement as well.

APPROVED BY:

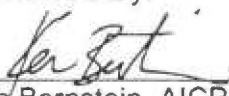


MICHAEL J. LOGRANDE
Director of Planning



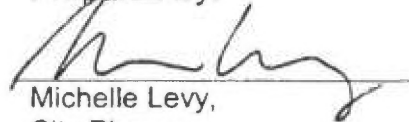
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Reviewed By:



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Principal City Planner,
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Prepared By:



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ATTACHMENTS

- A – Small Lot Subdivision Ordinance (Ord. No. 176,354)
- B – Venice Coastal Zone Subareas
- C – Venice Coastal Specific Plan Director's Interpretation
(DIR-2008-4703-DI-1A as adopted by the City Planning Commission on January 12, 2010)
- D – Small Lot Design Guidelines, effective February 1, 2014

cc: Council District 11 – Bonin
The Venice Neighborhood Council
CA Coastal Commission, South Coast Reg. Office

Date: 12/08/2014
Submitted in PLUM Committee
Council File No: 15-1387
Item No. 3



Council file #
15-1387

Agenda Item #3
12/8/15 PLUM
HEARING

MEMORANDUM
~~Comm from Public~~

TO: Mr. Frank Lawrence, WCH Communities, LLC
FROM: Patrick A. Gibson, P.E., PTOE
Richard Gibson, LEED Green Associate
DATE: December 4, 2015
RE: Responses to Comments on the Transportation Study for
The Village at Riverside Drive
Valley Village, California

Ref: J1364

Gibson Transportation Consulting, Inc. (GTC) was asked to review and respond to an appellant comments from a concerned neighbor regarding *Transportation Study for The Village at Riverside Drive Project, Valley Village, California* (Gibson Transportation Consulting, Inc., July 2015) (Transportation Study). This memorandum presents a copy of the comments and GTC's responses.

TRANSPORTATION/TRAFFIC COMMENT

"The proposed project will increase and exacerbate the level of traffic within our single family residential neighborhood where individuals and families, including young children, older adults and pets, walk and play. The increased level of traffic on these neighborhood streets will increase the number of cars, through traffic that already speeds through our neighborhood barely slowing down for stop signs. Moreover, together with the significant increase in street parking on the neighborhood streets, will create more conflicts between automobile traffic and pedestrians and children playing on narrower streets (with cars parked along the streets – the pedestrian, bikers, strollers, scooters, etc. are forced into the street where cars are driving).

- *"While the developer obtained a traffic study, that study failed entirely to investigate, analyze and evaluate the impacts on the neighborhood streets (Irvine, Blix, Kling, etc.) and focused on the main thoroughfares (Colfax and Riverside). Accordingly, there has never been a study of the impacts on the neighborhood streets."*

Transportation/Traffic Response

First, the project will slightly increase traffic on some of the streets mentioned, but it will not generate enough traffic to "exacerbate the level of traffic" within the neighborhood. The Project will not create additional cut-through traffic in the neighborhood because, by definition, cut-through traffic is a trip that has neither an origin nor a destination within the neighborhood. That is not the case for Project traffic. Project residents will be utilizing local

neighborhood streets to access their homes, not as routes through the neighborhood to other origins/destinations.

Further, the Project does not generate enough net new trips to warrant any level of study per *Traffic Study Policies and Procedures* (Los Angeles Department of Transportation [LADOT], August 2014). All that is required by LADOT for a project of this size is a simple trip generation memo with no impact analysis or intersection study of any kind. The Transportation Study was prepared in an effort to be overly-conservative in the analysis of the project's impacts, and as such, the study area and study intersections were analyzed well beyond any level of analysis required by LADOT.

Per LADOT, neighborhood streets are only studied to determine if cut-through traffic from non-residential developments will adversely impact the local neighborhood streets. Residential projects are not required to perform neighborhood street impact analysis.

The extremely low net trip generation of the Project (72 daily trips including six AM peak hour trips and eight PM peak hour trips) is not a sufficient quantity of trips to trigger any significant impacts at any intersections, roadway segments, freeway ramps, freeway segments, or local streets regardless of existing operating conditions or distribution patterns.

PARKING COMMENT

"The proposed project fails to provide sufficient parking for the occupants of the 16 3 bedroom, 3 1/2 bath single family homes (only providing one regular sized space for each home, with a compact space); and also fails to provide sufficient parking for guests (only 4 compact spaces for 16 homes). Accordingly, this will necessarily force the Project's occupants and their guests to park throughout the neighborhood – causing safety, quality of life, and other impacts (discussed in more detail in other documents). At a minimum, the Project should provide sufficient parking for its occupants and guests on-site – and not push its impacts into the neighborhood. Moreover, the Valley Village Specific Plan provides requirements to address these potential impacts – requirements that have been wholly ignored."

Parking Response

The project provides more than the number of parking spaces required by the Los Angeles Municipal Code (Code) and the Valley Village Specific Plan (Specific Plan). The Code requires two spaces per dwelling unit, which the project provides. The Specific Plan requires additional guest parking at a rate of one space per four units for multi-family developments. While the Project, as single-family homes and not a multi-family development, is not required to provide any guest parking spaces per the Specific Plan, it still proposes to provide four guest parking spaces.