



## DEPARTMENT OF CITY PLANNING

### APPEAL RECOMMENDATION REPORT

#### East Los Angeles Area Planning Commission

**Date:** June 8, 2016  
**Time:** After 4:30 P.M.\*  
**Place:** Ramona Hall Community Center  
4580 North Figueroa Street  
Los Angeles, CA 90065

**Public Hearing:** June 8, 2016  
**Appeal Status:** Not Further Appealable  
**Expiration Date:** June 10, 2016  
**Multiple Approval:** No

**Case No.:** AA-2015-3153-PMLA-SL  
**CEQA No.:** ENV-2015-3154-CE  
**Incidental Cases:** N/A  
**Related Cases:** N/A  
**Council No.:** 13  
**Plan Area:** Silver Lake-Echo Park-  
Elysian Valley  
**Specific Plan:** None  
**Certified NC:** Silver Lake  
**GPLU:** Low Medium II Residential  
**Zone:** RD2-1VL  
  
**Applicant:** Alan Quach, Urban Asset  
Group  
**Representative:** Yomar De La Vega, OXA  
Architects  
**Appellant:** The Sanborn Avenue  
Neighbors Association

**PROJECT LOCATION:** 1119 North Sanborn Avenue

**PROPOSED PROJECT:** The demolition of existing structures, the subdivision of one lot into four lots and the construction, use and maintenance of four new small lot homes on a 7,365 net square-foot site. Each unit will have two garage parking spaces and will be constructed to a maximum height of 37 feet.

**APPEAL:** Pursuant to L.A.M.C. Section 17.54, an appeal of the Deputy Advisory Agency approval of Preliminary Parcel Map No. AA-2015-3153-PMLA-SL for a maximum of four small lots and the construction of four single family dwellings in accordance with the Small Lot Subdivision Ordinance No. 176,354.

#### RECOMMENDED ACTIONS:


1. **Deny** the appeal and **sustain** the decision of the Deputy Advisory Agency for the subdivision of a maximum of four (4) small lots for the construction, use, and maintenance of four (4) small lot homes, pursuant to the provisions of Los Angeles Municipal Code Section 17.52

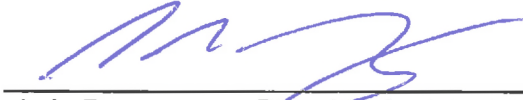
2. **Adopt** Categorical Exemption No. ENV-2015-3154-CE (Article III, Section 1, Class 15)

Class 15: consists of the division of property in urbanized areas zoned for residential, commercial, or industrial use into four or fewer parcels when the division is in conformance with the General Plan and zoning, no variances or exceptions are required, all services and access to the proposed parcels to local standards are available, the parcel was not involved in a division of a larger parcel within the previous 2 years, and the parcel does not have a slope greater than 20%.

3. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

VINCENT P. BERTONI, AICP  
Advisory Agency

  
Jordann Turner, City Planner  
Deputy Advisory Agency

  
JoJo Pewsawang, Planning Assistant  
Telephone: (213) 978-1214

**ADVICE TO PUBLIC:** \*The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *East Los Angeles Area Planning Commission Secretariat, 200 North Spring Street, Room 532, Los Angeles, CA 90012* (Phone No.213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1299.

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Exhibits:

- A. Vicinity Map
- B. Radius Map
- C. Parcel Map
- D. Advisory Agency Decision Letter
- E. Appeal Documentation(s)

## PROJECT ANALYSIS

### Project Summary

The proposed project is a Parcel Map (AA-2015-3153-PMLA-SL) to permit the construction of four (4) new small lot homes, with eight parking spaces in accordance with the City's Small Lot Subdivision Ordinance on a 7,365 square-foot site in the RD2-1VL Zone. The project site is located at 1119 North Sanborn Avenue at Witt Place (alley). The site is currently improved with two structures with three dwelling units, which will be demolished as part of the implementation of the proposed project.

### Background

The project site is 7,365 net square feet, consisting of an irregular-shaped corner lot, located at the intersection of an alley (Witt Place) and Sanborn Avenue. The site is currently developed with two buildings; a two-unit building built in 1919 and a one-unit building built in 1923. The Silver Lake-Echo Park-Elysian Valley Community Plan Map designates the property for Low Medium II Residential land uses with the corresponding zones of RD1.5, RD2, RW2, RZ2.5, and Height District No. 1VL. The subject site is not subject to any Specific Plans or Supplemental Use Districts. Sanborn Avenue is a local street and is improved to a 60-foot right-of-way width. Witt Place, the alleyway, is improved to a 15-foot right-of-way width.

The existing RD2-1VL Zone, which is consistent with the site's Low Medium II Residential land use designation by the Silver Lake-Echo Park-Elysian Valley Community Plan, would permit a maximum of four dwelling units with a maximum height of 45-feet. With a maximum permitted density of one dwelling unit per 2,000 square feet, and when taking into account one-half the alley (approximately 8,355 square feet), the subject site is permitted up to four (4) small lots.

The general area surrounding the site is developed with mixed-use, multi-family and single-family dwellings that range in height from one to three-stories. The northern adjoining properties are zoned RD2-1VL and are developed multi-family residential developments. The eastern adjoining properties (across Sanborn Avenue) are zoned RD2-1VL and are developed with a surface parking lot and multi-family residential developments. The southern adjoining properties (across the alleyway) are zoned [Q]C2-1VL and are developed with a two-story and a three-story mixed-use development with ground floor commercial and upper floor residential.

The subject property slopes downward from Sanborn Avenue towards the western property line. The proposed small lot dwellings will be three stories with a third floor open terrace. The buildings are staggered, creating spaces for common area landscaping along the common access walkway. All buildings are configured to take pedestrian access from either a common access walkway along the site's northern portion or directly from Sanborn Avenue. Vehicular access for all parcels is provided off of the alleyway (Witt Place). After the required dedication, the subdivision provides an 8.2-foot setback along Sanborn Avenue; a 5.6-foot northerly setback; a 9.8-foot westerly setback; and a southerly setback along the alley ranging from 6 feet to 16.6 feet.

The applicant has incorporated design elements to include: articulated building facades consisting of cement board siding, stucco walls, aluminum windows and metal guardrails; landscaping along the project's street frontages and within yards adjacent to neighboring properties; while incorporating balconies and horizontal planes to break up the project's massing.

**Public Hearing**

On February 17, 2016, the Deputy Advisory Agency held a public hearing for the proposed four-lot small lot subdivision. From the public, there were two speakers who spoke in opposition to the project, citing concerns about the density, neighborhood character, traffic, and safety.

The Deputy Advisory Agency instructed that the request be taken under advisement so that the applicant could schedule a meeting with the Silver Lake Neighborhood Council. On April 17, 2016, staff received a letter from the SLNC stating that they did not recommend support for the proposed project. The Neighborhood Council's Urban Design and Preservation Committee had previously recommended the project for approval at its March 2016 meeting.

On April 26, 2016, the Deputy Advisory Agency approved the requested subdivision for the four small lots pursuant to the City's Small Lot Ordinance (No. 176,354). Subsequently, an appeal of the Deputy Advisory Agency decision was filed by the appellant on May 11, 2016.

**APPEAL ANALYSIS**

Department of City Planning Staff recommends that the East Los Angeles Area Planning Commission deny the appeal and sustain the Advisory Agency's approval of Parcel Map No. AA-2015-3153-PMLA-SL to permit the subdivision of four small lots, in conjunction with the development of a maximum of four small lot homes.

The proposed project approval received a total of one appeal from a neighborhood group (The Sanborn Avenue Neighbors Association), representing Philip Lee, Madeleine Huttenback, Christine Kanter, Eunice Problete, Adrian Estrada, Christopher Kalmen, Alejandra Kalmen, Stuart Edwards, and Jacqueline Grimes. The main appeal points raised were related to neighborhood character, density, displacement, traffic safety, privacy, and building design.

**Appellant: The Sanborn Avenue Neighbors Association**

The following statements are from the appeal submitted by the appellant. The appeal in its entirety is attached for reference (see Exhibit D)

**REASONS FOR THE APPEAL**

- a. The proposed map is not consistent with the applicable general and site specific plans.
- b. The design and improvement of the proposed subdivision is not consistent with the General Plan.
- c. The site is not physically suitable for the proposed type of development.
- d. The site is not physically suitable for the proposed density of development.
- e. The design of the subdivision and the proposed improvements will indeed conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

- a. **The proposed map is not consistent with the applicable general and site specific plans.**

The appellants argue that the proposed small lot development is out of scale with the existing single-family and multi-family neighborhood, that privacy of the northerly abutting apartment units will be compromised by the development, and that the project will displace current residents.

**Staff Response:** The adopted Silver Lake – Echo Park – Elysian Valley Community Plan designates the subject property for Low Medium II Residential land uses with the corresponding zones of RD1.5, RD2, RW2, and RZ2.5. The property is presently zoned RD2-1VL. The site is not located within the area of a Specific Plan or Interim Control Ordinance.

The applicant is proposing to develop four (4) Small Lot Homes on a site consisting of four (4) Small Lots, per the Small Lot Ordinance and the Subdivision Map Act. The approved parcel map complies with the standards of the Small Lot Ordinance. Sanborn Avenue and the alley (Wit Place) are developed with buildings that vary in architectural design and height. Revisions to the dwellings were made prior to the hearing which included re-orienting the north facing windows of Lot 4 to the west to help address privacy concerns. The project will have a maximum height of 37 feet, which is well below the 45-foot height limit for the 1VL Height District.

The project is replacing three units of rental housing with four fee-simple single-family homes that will expand home ownership opportunities in the Silver Lake community. The project is consistent with Community Plan Policy 1-1.7 which seeks to:

Promote the unique quality and functionality of the Community Plan Area's mixed single and multiple family residential neighborhoods by encouraging infill development that continues to offer a variety of housing opportunities that capitalize on the eclectic character and architectural styles of existing development.

The proposed development is an infill development and will expand housing opportunities in the Silver Lake-Echo Park-Elysian Valley Community Plan area.

**b. The design and improvement of the proposed subdivision is not consistent with the General Plan.**

The appellants argue that the proposed small lot development is out of scale with the existing single-family and multi-family neighborhood.

**Staff Response:** As mentioned previously, the adopted Silver Lake – Echo Park – Elysian Valley Community Plan designates the subject property for Low Medium II Residential land use with the corresponding zone of RD1.5, RD2, RW2, and RZ2.5. The property contains approximately 0.17 net acres (7,365 net square feet and 8,355 square feet for density calculation purposes) and is presently zoned RD2-1VL. The applicant is proposing to develop four (4) Small Lot Homes on a site consisting of four (4) Small Lots, per the Small Lot Ordinance and the Subdivision Map Act.

Section 12.22-C,16 of the Los Angeles Municipal Code allows for lots abutting an alley to count one-half the width of the alley to be a portion of the lot for purposes of calculating density (lot area per dwelling unit). The RD2 Zone has a lot area per dwelling unit of 2,000 square feet. When accounting for half the alley, the total lot area for density purposes is approximately 8,355 square feet. Thus the project is permitted to develop up to four dwelling units. The 1VL Height District permits a height of up to 45 feet. The project will have a maximum height of 37 feet. Thus, the project is consistent with the General Plan.

DENSITY CALCULATION	
Density Calculation = $\frac{(\text{Lot Area} + 1/2 \text{ Alley}) - (\text{Required Street Dedication})}{\text{RD2 Lot Area/Dwelling Unit}}$	
$\frac{7,696 \text{ SF} + (132 \text{ feet} \times 7.5 \text{ feet}) \text{ SF} - 331 \text{ SF}}{2000 \text{ SF}}$	
<b>4 Dwelling Units</b>	= $\frac{8355 \text{ SF}}{2000 \text{ SF}}$

In 2014, the City introduced the Small Lot Design Guidelines in an effort to encourage a better design outcome of Small Lot Subdivisions. The Advisory Agency's authority is established under L.A.M.C. Section 17.03 and pursuant to Subdivision Map Act (Division 2, Title 7 of the Government Code). The Advisory Agency may deny a subdivision if any one of the seven mandated findings cannot be made in the affirmative. While the Guidelines provide best practices on designing Small Lot Subdivision, it does not give the Advisory Agency authority to deny a subdivision based on its full compliance with the Guidelines.

Neither L.A.M.C. Section 17.03 nor the Subdivision Map Act permit the Advisory Agency from using the Guidelines as the basis in its decision-making process. In fact, the use of the Guidelines to deny a project would violate the Subdivision Map Act, and constitute an abuse of discretion.

**c. The site is not physically suitable for the proposed type of development.**

The appellants argue that the project should not be allowed to account for half the alley when calculating allowable density. The appellants also argue that the alley is substandard which causes safety risks for the community.

**Staff Response:** Wit Place is an alleyway that is improved to a substandard width of 15 feet. The alleyway runs east-west for approximately 265 feet between Manzanita Street and Sanborn Avenue. The next closest east-west thoroughfare linking Manzanita Street and Sanborn Avenue is Effie Street, which is located approximately 400 feet to the north of Wit Place

The project will dedicate and improve 2.5 feet along Wit Place to complete a 10-foot wide half right-of-way dedication to comply with alleyway standards, completing a 17.5-foot wide alley along the project site. The proposed small lots will not cantilever over the alley and will provide a setback ranging between 6 feet to 16.6 feet.

The Small Lot Design Guidelines encourages "where possible...[to] utilize alleyways for vehicular access." There is an existing 19 unit apartment complex just to the east near the intersection of the alleyway and Manzanita Street that also has direct vehicle garage access from the alley. The project will require review from the Department of Transportation, the Bureau of Engineering, and the Fire Department prior to the issuance of building permits.

As mentioned previously, Section 12.22-C,16 of the Los Angeles Municipal Code allows for lots abutting an alley to count one-half the width of the alley to be a portion

of the lot for purposes of calculating density (lot area per dwelling unit). The RD2 Zone has a lot area per dwelling unit of 2,000 square feet. When accounting for half the alley and subtracting for required street dedications, the total lot area for density purposes is approximately 8,355 square feet. Thus the project is permitted to develop up to four dwelling units on the site.

**d. The site is not physically suitable for the proposed density of development.**

The appellants seek to limit the development to three homes, maintain prevailing setbacks, and maintain the open yard at the western end for emergency vehicle deployment. The appellants are also seeking greater northerly setbacks to preserve privacy and a conversion of the alley from two way to one way prior to the approval of the subdivision.

**Staff Response:** As stated previously, the project site is located within the RD2-1VL Zone, which permits a minimum lot area per dwelling unit of 2,000 square feet. The site is an irregularly-shaped corner lot with a net lot area of 7,365 square feet (8,355 square feet for density purposes), which allows a maximum of four units (when accounting for ½ the width of the alley and deducting required street dedication). The project density is thus appropriate for the site.

The proposed small lot subdivision requires a minimum 5-foot setback from adjoining property lines. The project complies with the standards of the Small Lot Ordinance.

Sanborn Avenue and Wit Place are developed with buildings that vary in architectural design and height. Revisions to the dwellings were made prior to the hearing which included altering the location of windows along Lot 4's northern building frontage to face away from the adjoining apartment building to better preserve privacy.

The neighborhood and the Council Office have been working to change the alley into a one way alley. The applicant has stated that they would be willing to support the request. The one-way alley project is not a part of the subdivision request.

**e. The design of the subdivision and the proposed improvements will indeed conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.**

The appellants have concerns regarding traffic down the alley including deliveries, emergency vehicle access, and pedestrian travel.

**Staff Response:** There are no easements within the subject subdivision that are known to exist. Needed public access for roads and utilities will be acquired by the City prior to the recordation of the proposed parcel map. The project is providing a common access walkway along the northern portion of the property for pedestrian access to Lots 2 -4. Vehicular access will be from the alley. The Small Lot Design Guidelines encourage the use of alleyways as access for off-street parking. By utilizing the alleyway for vehicular parking, the project will separate pedestrian and vehicular access to the site. Further, the Los Angeles Fire Department will review the project's plans as a part of the permit approval process to ensure that adequate emergency access is provided for the site and the surrounding neighborhood.

## **STAFF RECOMMENDATION**

The Deputy Advisory Agency approved a parcel map for the subdivision of one lot into four (4) small lots for the construction of four (4) single family homes. The approved parcel map is in conformance with the regulations of the LAMC, Subdivision Map Act and Small Lot Subdivision Ordinance; has been designed to substantially comply with the Small Lot Design Guidelines; is consistent with the intent and purpose of the General Plan; and the project site is suitable for the proposed density of the development. The Small Lot Subdivision approval was determined to be appropriate given the project site's RD2-1VL zoning and Low Medium II Residential land use.

In consideration of all the facts and applicable codes, policies, ordinances, and the Subdivision Map Act, the Deputy Advisory Agency acted reasonably in approving Parcel Map No. AA-2015-3153-PMLA-SL. Therefore, staff recommends to the East Los Angeles Area Planning Commission that the decision of the Deputy Advisory Agency be sustained and the appeal be denied.

# EXHIBIT A



Map data ©2015 Google 200 ft

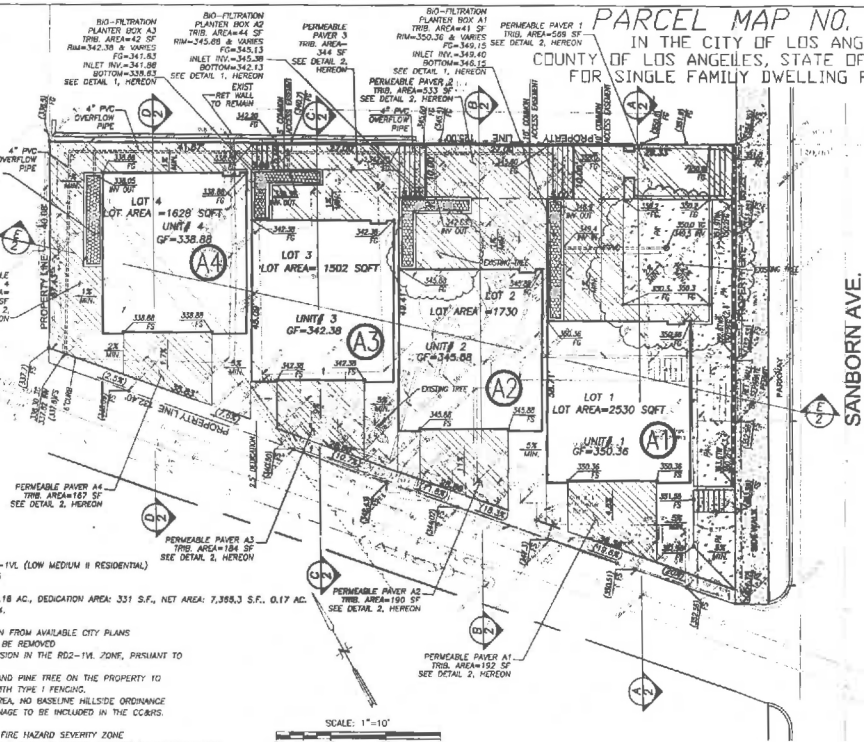
## EXHIBIT B

2015-3153



## **EXHIBIT C**

# PARCEL MAP NO. XXXXX IN THE CITY OF LOS ANGELES COUNTY OF LOS ANGELES, STATE OF CALIFORNIA FOR SINGLE FAMILY DWELLING PURPOSES



## NOTES:

- EXISTING/PROPOSED ZONING: RD2-1V (LOW MEDIUM DENSITY RESIDENTIAL)
- THOMAS GUIDE: P. 594; GRID B-5
- APN: 5429-010-023
- GROSS LOT AREA: 7,896.3 S.F., 0.18 AC., DEDICATION AREA: 331 S.F., NET AREA: 7,565.3 S.F., 0.17 AC.
- NUMBER OF PROPOSED UNITS = 4.
- SETBACKS: SEE MATRIX HEREON.
- SUBSURFACE UTILITIES WERE BATHED FROM AVAILABLE CITY PLANS
- 2 RESIDENTIAL BUILDINGS ARE TO BE REMOVED
- SMALL LOT SINGLE FAMILY SUBDIVISION IN THE RD2-1V ZONE, PRESENT TO ORDINANCE NO. 176,354.
- THERE IS ONE LARGE CANARY ISLAND PINE TREE ON THE PROPERTY TO BE PRESERVED AND PROTECTED WITH TYPE 1 FENCING.
- THE SITE IS NOT IN A HILLSIDE AREA, NO BASELINE HILLSIDE ORDINANCE.
- ALLOWANCE FOR CROSS LOT DRAINAGE TO BE INCLUDED IN THE CC&BS.
- FLOOD ZONE: NONE
- PROJECT IS NOT IN A VERY HIGH FIRE HAZARD SEVERITY ZONE
- PROJECT WILL BE SERVED BY PUBLIC SANITARY SEWER, CONNECT TO EXISTING SEWER.

## PROJECT INFORMATION:

**OWNER**  
URBAN ASSET GROUP  
314 N. VEGA STREET  
ALHAMBRA, CA 91801  
(626) 731-4339  
CONTACT: ALAN QUACH

**CIVIL ENGINEER**  
LC ENGINEERING GROUP, INC.  
880 PIERCE COURT  
SUITE 101  
THOUSAND OAKS, CA 91320  
(805) 497-1944 (818) 991-7148  
CONTACT: JIM PAUL

**SURVEYOR**  
H & M & CO.  
18145 ROSCOE BLVD.  
NORTH HILLS, CA 91343  
(818) 881-8100  
CONTACT: GREGORY M. AMOROSO

**GEOTECHNICAL**  
GEOSYSTEMS, INC.  
1544 VICTORY BLVD., 2ND FLOOR  
GLENDALE, CA 91201  
(818) 506-1533  
CONTACT: KX900000X

## UTILITIES

WATER - LOS ANGELES CITY DEPT OF WATER & POWER  
WASTEWATER - CITY OF LOS ANGELES  
REFUSE - CITY OF LOS ANGELES  
CABLE - TIME WARNER CABLE  
800-892-2233  
PHONE - VERIZON  
800-493-4000  
ELECTRIC - LOS ANGELES CITY DEPT OF WATER & POWER  
GAS - SO. CALIF. GAS (SEMPRA)  
800-477-2200

## LEGAL DESCRIPTION:

LOT 176 OF HYPERION TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15 PAGE 141, OF MAPS IN THE OFFICE OF THE COUNTY RECORDER OF SAO COUNTY.

## BENCH MARK:

THE ELEVATION OF 333.4 ON SEWER MANHOLE STATION 12+58.00 AS SHOWN ON SEWER "Y" MAP NO. 7219-1 ON FILE IN THE CITY OF LOS ANGELES WAS USED AS DATUM FOR THIS SURVEY.

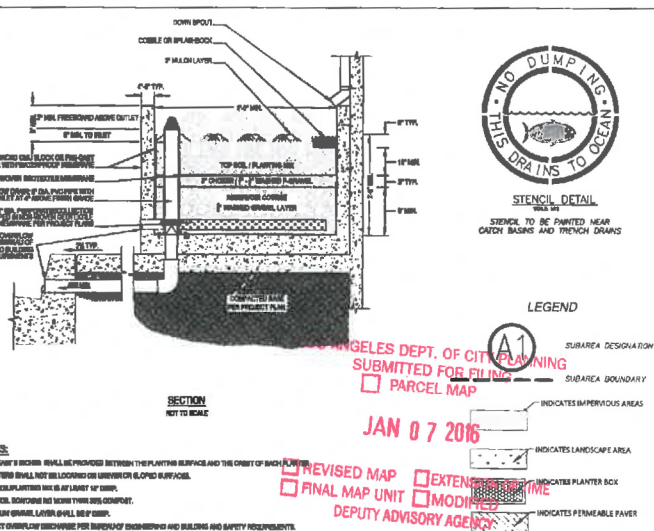
## EARTHWORK QUANTITIES

RAV CUT 156 CY  
RAV FILL 231 CY  
IMPORT 75 CY

## LOT TABLE

LOT#	UNIT#	1ST FLOOR COVERAGE (ACRES)	SETBACK FRONT	SETBACK REAR	SETBACK YARD EAST	SETBACK YARD WEST
1	1	758	7'-0" - 16'-0"	32'-1"	8'-2"	0'-2"
2	2	758	7'-0" - 16'-0"	22'-9"	1'-0"	0'-2"
3	3	758	8'-0" - 15'-0"	14'-2"	1'-0"	0'-2"
4	4	758	8'-0" - 15'-1"	5'-6"	1'-0"	9'-8"

\* BASED ON NEW PROPERTY LINE, AFTER 2'-8" DEDICATION

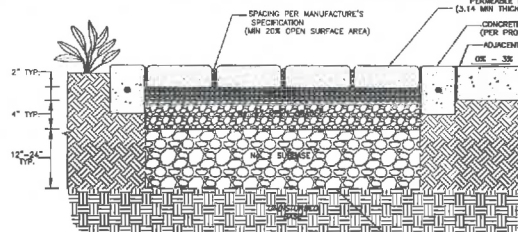


## NOTES:

- AT LEAST 8 INCHES SHALL BE PROVIDED BETWEEN THE PLANTING SURFACE AND THE ORBIT OF EACH PLANT.
- PLANTING SHALL NOT BE LOCATED ON UNIFORM OR SLOPED SURFACES.
- TOP SOIL SHALL BE 18 INCHES DEEP.
- TOP SOIL SHALL BE 18 INCHES DEEP.
- UNIFORM GRASS SHALL BE 18 INCHES DEEP.
- DIRECT OVERFLOW DISCHARGE PER BUREAU OF ENGINEERING AND BUILDING & SAFETY REQUIREMENTS.
- USE PLANTING BOX THAT SUBMIT FOR MORE INFORMATION.

## DETAIL 1 BIO-FILTRATION PLANTER BOX W/DOWNSPOUT SCALE: NTS

subarea	total area	% impervious	impervious area	required volume	depth of ponding	Keat, design	dp max	minimum planter box area	actual planter box area
(sq ft)	(sq ft)	(%)	(sq ft)	(cu ft)	(ft)	(in/hr)	(in)	(sq ft)	(sq ft)
A1	0.02	100	0.02	84	1.0	2.5	10.0	39	41
A2	0.02	100	0.02	86	1.0	2.5	10.0	41	44
A3	0.02	100	0.02	86	1.0	2.5	10.0	41	42
A4	0.02	100	0.02	85	1.0	2.5	10.0	40	40



## NOTES:

- SITE SOILS SHALL HAVE ADEQUATE DRAINAGE (AT LEAST 0.5 INCHES PER HOUR).
- INFILTRATION SHALL NOT CAUSE GEOTECHNICAL HAZARDS RELATED TO EXPANSIVE SOIL, MOVEMENT, TUNNEL, EROSION, OR SLOPE STABILITY.
- IF INFILTRATION HAZARDS ARE A CONCERN, AN UNDERDRAIN SHALL BE INSTALLED TO DRAIN WATER INTO STORM DRAIN INLET OR ON-SITE BMP. GEOTEXTILE SHALL BE REPLACED WITH IMPERMEABLE LINER AND UNDERDRAIN PRECURSED PAVE.
- ANY OVERFLOW SHALL BE DISCHARGED PER BUREAU OF ENGINEERING AND BUILDING & SAFETY REQUIREMENTS.
- SLOPE IS NOT GREATER THAN 3 PERCENT.
- FLOW DIRECTED TO PERMEABLE PAVEMENT SHALL BE DISPERSED SO AS NOT TO BE CONCENTRATED AT A SMALL AREA OF PAVEMENT.
- PRE-FABRICATED PRODUCTS HAVE BEEN INSTALLED PER ALL APPROPRIATE MANUFACTURER'S SPECIFICATIONS. IF REQUIRED, SUB-GRADE SOIL SHALL BE COMPACTED IN ACCORDANCE WITH PRODUCT INSTALLATION SPECIFICATIONS.
- SEE PERMEABLE PAVERS' FACT SHEET FOR MORE INFORMATION.

## DETAIL NO. 2 LA CITY PERMEABLE PAVEMENT SCALE: NTS

**LC ENGINEERING GROUP, INC.**  
REGISTERED ENGINEER NO. 52258 DATE  
SCALE: 1"=10' J.M. 7050  
DATE: APR 24, 2015 DWS: NAME: 7050 Test Map.dwg

APN: 542-9-010-023  
CITY OF LOS ANGELES  
PARCEL MAP NO. XXXXX  
FOR URBAN ASSET GROUP  
1119 SANBORN AVENUE  
LOS ANGELES, CALIFORNIA  
PLANNING & ZONING PERMIT NO.

SHEET  
1  
OF 2

## EXHIBIT D

DEPARTMENT OF  
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ  
PRESIDENT

RENEE DAKE WILSON  
VICE-PRESIDENT

ROBERT L. AHN  
CAROLINE CHOE  
RICHARD KATZ  
JOHN W. MACK  
SAMANTHA MILLMAN  
VERONICA PADILLA  
DANA M. PERLMAN

JAMES K. WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



ERIC GARCETTI  
MAYOR

EXECUTIVE OFFICES  
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JAN ZATORSKI  
DEPUTY DIRECTOR  
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FAX: (213) 978-1275

INFORMATION  
<http://planning.lacity.org>

Decision Date: April 26, 2016

Appeal Period Ends: May 11, 2016

Alan Quach (A)  
Urban Asset Group  
514 North Vega Street  
Alhambra, CA 91801

Thomas A. Bayles (O)  
Urban Asset Group  
514 North Vega Street  
Alhambra, CA 91801

Yomar De La Vega (R)  
OXA Architects  
280 West Channel Road  
Santa Monica, CA 90402

RE: Preliminary Parcel Map No. AA-2015-3153-  
PMLA-SL  
Address(s): 1119 Sanborn Avenue  
Related Case(s): N/A  
Planning Area: Silver Lake-Echo Park  
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C. D. : 13  
CEQA : ENV-2015-3154-CE

In accordance with provisions of Los Angeles Municipal Code (LAMC) Sections 17.15 and 12.22-C,27, the Advisory Agency approved Parcel Map No. AA-2015-3153-PMLA-SL, located at 1119 Sanborn Avenue for a maximum of **4 Small Lots** for the purposes of a Small Lot Subdivision as shown on map stamp-dated January 7, 2016 in the Silver Lake-Echo Park-Elysian Valley Community Plan. This unit density is based on the RD2-1VL Zone. (The subdivider is hereby advised that the LAMC may not permit this maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety, which will legally interpret the Zoning code as it applies to this particular property.) For an appointment with the Development Services Center call (213) 482-7077 or (818) 374-5050. The Advisory Agency's approval is subject to the following conditions:

**NOTE** on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

**BUREAU OF ENGINEERING - SPECIFIC CONDITIONS**

1. That a 2.5-foot wide strip of land be dedicated along the alley (Wit Place) adjoining the subdivision to complete a 10-foot wide half right-of-way dedication.
2. That if necessary and for the street address purposes, if this parcel map is approved as "Small Lot Subdivision", then all the common access area to this subdivision be named on the final map.
3. That if this parcel map is approved as small lot subdivision, then the final map be labeled as "Small Lot Subdivision per Ordinance 176354".
4. That any necessary public sanitary sewer easement with sufficient width be dedicated on the final map based on an alignment approved by the West Engineering District Office.
5. That if necessary and for street address purposes, the owners of the property record an agreement satisfactory to the City Engineer that they will provide name signs for the common access driveways.
6. That any fee deficit under Work Order No. EXP00136 expediting this project be paid.
7. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:
  - a. Improve Sanborn Avenue adjoining the subdivision by repairing and replacing any broken or off grade curb, gutter, sidewalk, and roadway pavement; plant trees and landscape the parkway area.
  - b. Improve the alley (Wit Place) being dedicated and adjoining the subdivision by reconstruction of a 2-foot wide longitudinal concrete gutter and suitable surfacing to complete a 17.5-foot wide alley pavement, including reconstruction of the alley intersection with Sanborn Avenue, together with any necessary removal and reconstruction of the existing improvements.
  - c. Construct the necessary house connections to serve each parcel, or any other arrangement acceptable to the Central Engineering District Office.

Any questions regarding this report should be directed to Ray Saidi of the Land Development Group, located at 201 North Figueroa Street, Suite 200, or by calling (213) 202-3492.

**DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION**

8. Comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

**DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION**

9. Prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:
- a. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.
  - b. Show all street/alley dedications as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street/alley dedication. Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedications.
  - c. Lot 1 do not comply with the minimum 15 ft. front yard setback along Sanborn Avenue after required street dedication is taken as required for the **RD2-1VL** Zone. Revise the Map to show compliance with the above requirement or obtain approval from the Department of City Planning.
  - d. Resubmit the map to provide and maintain a minimum 20 ft. common access for lot frontage, driveway, and egress/ingress purposes all the way to the public street. Revise the Map to show compliance with the above requirement or obtain approval from the Department of City Planning to allow Lots 2-4 to front the alley.
  - e. Provide and dimension the reciprocal private easement for pedestrian and driveway egress and ingress in the final map.

**Notes:**

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

Backup space for parking space with less than 26'-8" shall provide sufficient parking stall width and garage door opening width to comply with

the current Zoning Code requirement.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Eric Huang at (213) 482-6876 to schedule an appointment.

#### DEPARTMENT OF TRANSPORTATION

10. Prior to recordation of the final map, satisfactory arrangements shall be made with the Department of Transportation to assure:
- a. A parking area and driveway plan shall be submitted to the Citywide Planning Coordination Section of Department of Transportation (DOT) for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 201 N. Figueroa Street Suite 400, Station 3. All driveways should be Case 2 driveways and 30 feet and 16 feet wide for two-way and one-way operations, respectively, or to the satisfaction of DOT.
  - b. That the project be subject to any recommendations from the Department of Transportation.

Notes:

Please contact this section at (213) 482-7024 for any questions regarding the above.

#### FIRE DEPARTMENT

11. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:
- a. Access for Fire Department apparatus and personnel to and into all structures shall be required.
  - b. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
  - c. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
  - d. Submit plot plans indicating access road and turning area for Fire Department approval.
  - e. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

**Note:**

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. 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 please call (213) 482-6502. You should advise any consultant representing you of this requirement as well.

**DEPARTMENT OF WATER AND POWER**

12. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWPs Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWPs Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(c).)

**BUREAU OF STREET LIGHTING**

13. Prior to the recordation of the final map, Street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment.
  - a. Construct new street light: one (1) on Sanborn Avenue

**BUREAU OF SANITATION**

14. Satisfactory arrangements shall be made with the Bureau of Sanitation, Wastewater Collection Systems Division for compliance with its sewer system review and requirements. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

**INFORMATION TECHNOLOGY AGENCY**

15. That satisfactory arrangements be made in accordance with the requirements of the Information Technology Agency to assure that cable television facilities will be installed in the same manner as other required improvements. Refer to the LAMC Section 17.05-N. Written evidence of such arrangements must be submitted to the Information Technology Agency, 200 North Main Street, 12<sup>th</sup> Floor, Los Angeles, CA 90012, 213 922-8363.

**DEPARTMENT OF RECREATION AND PARKS**

16. That the Quimby fee be based on the RD2-1VL Zone.

**URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING**

17. Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the site shall be submitted for approval by the Department of City Planning. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

Replacement by a minimum of 24-inch box trees in the parkway and four trees on the site to be removed, shall be required for the unavoidable loss of desirable trees on the site, and to the satisfaction of the Advisory Agency.

**Note:** Removal of all trees in the public right-of-way shall require approval of the Board of Public Works. Contact: Urban Forestry Division at: (213) 485-5675. Failure to comply with this condition as written shall require the filing of a modification to this tract map in order to clear the condition.

**DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS**

18. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
- a. A Certificate of Occupancy (temporary or final) for the building(s) in Parcel Map No. AA-2015-3153-PMLA-SL shall not be issued until after the final map has been recorded.
  - b. Limit the proposed development to a maximum of four (4) small lots.
  - c. Provide a minimum of two (2) covered off-street parking spaces per dwelling unit. (Note: One space may be a compact space. Tandem parking is allowable.)
  - d. Prior to issuance of a certificate of occupancy, a minimum 6-foot-high slumpstone or decorative masonry wall shall be constructed adjacent to neighboring residences, if no such wall already exists, except in required front yard.
  - e. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.
  - f. That the subdivider considers the use of natural gas and/or solar energy and consults with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.
  - g. Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the

public right-of-way.

- h. **TENANT RELOCATION ASSISTANCE.** That the applicant execute and record a Covenant and Agreement (Planning Department General Form CP-6770) in a form satisfactory to the Advisory Agency binding the applicant and any successor in interest to provide tenant relocation assistance and establish a relocation program in a manner consistent with LAMC Section 47.07 relating to demolition. The covenant and agreement shall be executed and recorded within 10 days after the expiration of the appeal period (and final action thereon) and a copy provided to each eligible tenant within five days of recordation of the covenant and agreement.

19. Small Lot Standards:

- a. Provide and maintain a 5-foot common access strip, clear to the sky, for lots 1, 2, 3, and 4, all the way to the public street for pedestrian access purposes.
- b. A utility easement with a minimum width of 5 feet shall be maintained open to the sky.
- c. Trash and recycling receptacles shall be located out of the public right-of-way and individual bins shall be stored privately in garages. Trash collection shall be coordinated and signed off satisfactory to the Bureau of Sanitation.
- d. A Maintenance Agreement shall be formed for the small lot portion of the project, composed of all property owners, to maintain all common areas such as trees, landscaping, trash, parking, community driveway, public access way(s), walkways, monthly service for private fire hydrant (if required), etc. Each owner and future property owners shall automatically become members of the association and shall be subject to a proportionate share of the maintenance. The Maintenance Agreement shall be recorded as a Covenant and Agreement to run with the land and including the remaining parcels. The subdivider shall submit a copy of this Agreement, once recorded to the Planning Department for placement in the tract file.
- e. Copies of all recorded Covenant and Agreement(s) for all reciprocal private easements shall be submitted to the Planning Department for placement in the tract file.

**Note to City Zoning Engineer and Plan Check.** The Advisory Agency has approved the following variations from the Los Angeles Municipal Code as it applies to this subdivision and the proposed development on the site. Approved Variations as follows:

- 1) Setbacks shall be permitted as follows:

Lot No.	Setbacks			
	Front	Rear	Side (East)	Side (West)
1	7.5'-16.6'	32.1'	8.2'	0.2'
2	7.4'-16.5'	22.8'	1.0'	0.2'
3	6.8'-15.8'	14.2'	1.0'	0.2'
4	6.0'-15.1'	5.6'	1.0'	9.8'

20. Prior to the clearance of any parcel map conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.

21. **INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.**

The applicant shall do all of the following:

- a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- e. If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms

consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

### **FINDINGS OF FACT (CEQA)**

The Department of City Planning, on January 25, 2016, determined that the City of Los Angeles Guidelines for the Implementation of the California Environmental Quality Act designate the subject project as categorically exempt under Article III, Section 1, Class 15.

### **FINDINGS OF FACT (SUBDIVISION MAP ACT)**

In connection with the approval of Preliminary Parcel Map No. AA-2015-3153-PMLA-SL, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

- (a) THE PROPOSED MAP WILL BE/IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The requested Small Lot Subdivision allows for the subdivision of underutilized land in multi-family and commercial areas into fee-simple homes. Intended as an infill development and a smart-growth alternative to traditional, suburban style single-family subdivisions, small lot homes have smaller lot areas with compact building footprints and reduced yard setbacks, street frontages, passageways between buildings, and open space. As such, small lot subdivisions oftentimes create parcels with a unique set of design and spatial complexities.

The adopted Silver Lake – Echo Park – Elysian Valley Community Plan designates the subject property for Low Medium II Residential land use with the corresponding zone of RD1.5, RD2, RW2, and RZ2.5. The property contains approximately 0.17 net acres (7,365 square feet) and is presently zoned RD2-1VL (approximately 8,600 square feet when including half the alley). The applicant is proposing to develop four (4) Small Lot Homes on a site consisting of four (4) Small Lots, per the Small Lot Ordinance and the Subdivision Map Act.

The project will provide much needed new home ownership opportunities for the Community Plan area. The Silver Lake-Echo Park-Elysian Valley Community Plan, a part of the Land Use Element of the City's General Plan, states the importance of promoting and ensuring "the provision of adequate housing for all persons, including special needs populations, regardless of income, age or ethnic backgrounds" (Objective 1-4). Applicable policies include the promotion of "greater individual choice in type, quality, price and location of housing" (Policy 1-4.1), and increasing "home ownership options by providing opportunities for development of townhouses, condominiums and similar types of housing" (Policy 1-4.4).

The Subdivision Map Act requires the Advisory Agency find that the proposed map be consistent with the General Plan, which includes Urban Form and Neighborhood Design (Chapter 5 of the General Plan Framework Element). The proposed project activates the site by providing well-designed homes with articulated building facades, landscaping along the project's street frontages, and employing a variety of materials to break up the project's massing. The project's density, height, setbacks, and massing are consistent with the site's existing zoning regulations, the Small Lot Ordinance, and Chapter 5 of the General Plan Framework Element.

The proposed small lot project, as conditioned, will meet the intent of the aforementioned Community Plan's Goals and Objectives and will provide much needed new home ownership opportunities for the Silver Lake – Echo Park – Elysian Valley Community Plan area in the form of multiple-family dwellings as part of an infill development.

The site is not subject to the Specific Plan for the Management of Flood Hazards (floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas). As such, the Advisory Agency concludes that the proposed tract map is consistent with the intent and purpose of the General Plan.

- (b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The design and improvement of the proposed subdivision are consistent with the Silver Lake – Echo Park – Elysian Community Plan and are not subject to any Specific Plan requirements. Sanborn Avenue is a Local Street dedicated to a 60-foot width at the project's street frontage. For the purposes of approving a small lot subdivision, the "design" of the tract or parcel map refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout and building design. Easements and/or access and "improvements" refers to the infrastructure facilities serving the subdivision. The project was reviewed by various city agencies that have the authority to make improvement recommendations. Staff received recommendations from the Bureau of Engineering for the construction of the necessary house connection sewers, dedication of two feet along the alleyway (Wit Place), and the reconstruction of a 2-foot wide longitudinal concrete gutter and suitable surfacing to complete a 17.5-foot wide alley pavement. In addition, all necessary street improvements will be made to comply with the Americans with Disabilities Act (ADA) of 1990.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

A mix of multi-family residential and commercial makes up the general character of the surrounding neighborhood. The project is located near Sunset Junction in the heart of Silver Lake. The general area surrounding the site is developed with mixed-use, multi-family and single-family dwellings that range in height from one to three-stories. The northern adjoining properties are zoned RD2-1VL and are developed multi-family residential developments. The eastern adjoining properties (across Sanborn Avenue) are zoned RD2-1VL and are developed with a surface parking lot and multi-family residential developments. The southern adjoining properties (across the alleyway) are zoned [Q]C2-1VL and are developed with a two-story and a three-story mixed-use development with ground floor commercial (fronting Sunset Boulevard) and residential on the upper floors.

The project site is an underutilized lot that consists of 7,365 square feet of land, is currently improved with two structures with three dwelling units, which will be demolished as part of the implementation of the proposed project. The proposed project is considered an infill development in a neighborhood that has a mix of commercial and residential uses and is consistent with the density and height district of the RD2-1VL Zone. The project site is located within 0.1 kilometers of the nearest known fault (Upper Elysian Park). The site is not located within a hillside area, high fire hazard area, landslide area, tsunami inundation zone, or flood zone. The site is not identified as having hazardous waste or past remediation. The project site is located within a BOE Special Grading Area. The site is located within Flood Zone Type C, outside of a Flood Zone.

The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. Therefore, the site will be physically suitable for the proposed type of development.

- (d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

Adjacent land uses consist of multi-family, mixed-use, and commercial land uses. The project proposes the development of four (4) single-family small lot dwellings consistent with the density of the RD2 Zone. The applicant is permitted to construct four (4) residential condominiums or apartment units by-right per the RD2 Zone.

The proposed project would provide an appropriate transitional development between the mixed-use commercial developments to the south and the multi-family and single-family uses to the north, east, and west. The site is currently developed with a three-unit residence consisting of two buildings, constructed in 1919 and 1923, respectively. The proposed project will comply with all LAMC requirements for parking, yards, and open space in accordance with Ordinance No. 176,354. As conditioned the proposed tract map is physically suitable for the proposed density of the development.

- (e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The project site, as well as the surrounding area, is developed with structures and no identified fish, wildlife, or established habitat is located on-site. As such, the proposed design of the subdivision and the proposed improvements are not anticipated to cause any substantial damage or substantially and avoidably injure fish or wildlife or their habitat.

- (f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet statewide ocean discharge standards.

The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

- (g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

No such easements are known to exist. Needed public access for roads and

utilities will be acquired by the City prior to the recordation of the proposed tract.

- (h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans, planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the preliminary and final maps for Preliminary Parcel Map No. AA-2015-3153-PMLA-SL.

Vincent P. Bertoni, AICP  
Advisory Agency



Jordann Turner  
Deputy Advisory Agency

JT:JP

**Note:** If you wish to file an appeal, it must be filed within 15 calendar days from the decision date as noted in this letter. For an appeal to be valid to the **East Los Angeles Area Planning Commission**, it must be accepted as complete by the City Planning Department and appeal fees paid, prior to expiration of the above 15-day time limit. Such appeal must be submitted on Master Appeal Form No. CP-7769 at the Department's Public Offices, located at:

Figueroa Plaza  
201 N. Figueroa St., 4<sup>th</sup> Floor  
Los Angeles, CA 90012  
213 482-7077

Marvin Braude San Fernando Valley  
Constituent Service Center  
6262 Van Nuys Blvd., Room 251  
Van Nuys, CA 91401  
818 374-5050

**Forms are also available on-line at <http://cityplanning.lacity.org/>.**

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

If you have any questions, please call Development Services Center staff at (213) 482-7077 or (818) 374-5050.

## **EXHIBIT E**

Application:

## APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

### 1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☒ Area Planning Commission ☐ City Planning Commission ☐ City Council ☐ Director of Planning

Regarding Case Number: AA-2015-3153-PMLA-SL

Project Address: 1119 Sanborn Ave, Los Angeles, CA 90029

Final Date to Appeal: May 11, 2016

Type of Appeal: ☒ Appeal by Applicant  
☐ Appeal by a person, other than the applicant, claiming to be aggrieved  
☐ Appeal from a determination made by the Department of Building and Safety

### 2. APPELLANT INFORMATION

Appellant's name (print): Philip Lee, Madeleine Huttenback, Christine Kantner, Eunice Poblete, Adrian Estrada

Company: Christopher Kalmen, Alejandra Kalmen, Stuart Edwards and Jacqueline Grimes

Mailing Address: 3924 W. Sunset Blvd.

City: Los Angeles State: CA Zip: 90029

Telephone: 323.804.6885 E-mail: christinekantner@mac.com

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

☐ Self ☒ Other: The Sanborn Avenue Neighbors Association

- Is the appeal being filed to support the original applicant's position? ☐ Yes ☒ No

### 3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): N/A

Company: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ E-mail: \_\_\_\_\_

**ORIGINAL**

#### 4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed?

☒ Entire

☐ Part

Are specific conditions of approval being appealed?

☒ Yes

☐ No

If Yes, list the condition number(s) here: Subdivision Map Act A, B, C, D, G

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

#### 5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: \_\_\_\_\_

Date: 05-09-2016

#### 6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- Original Applicants must pay mailing fees to BTC and submit a copy of receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered original applicants and must provide noticing per LAMC 12.26 K.7.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. (CA Public Resources Code § 21151 (c)). CEQA Section 21151 (c) appeals must be filed within the next 5 meeting days of the City Council.

This Section for City Planning Staff Use Only		
Base Fee: <b>\$89</b>	Reviewed & Accepted by (DSC Planner): <b>Ulises Gonzalez</b>	Date: <b>5/11/16</b>
Receipt No: <b>29661</b>	Deemed Complete by (Project Planner):	Date:
<input type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

May 10, 2016

**VIA HAND DELIVERY**

City of Los Angeles  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA 90012

**Re: Appeal of Preliminary Parcel Map No. AA-2015-3253-PMLA-SL  
(1119 Sanborn Avenue)**

Dear Department of City Planning,

We, The Sanborn Avenue Neighbors Association are appealing your decision dated April 26, 2016 based on the following reasons:

**A. The Proposed Map IS NOT CONSISTENT with the Applicable General and Site Specific Plans**

The project is inconsistent with the policies that include the following:

- Protect existing single family residential neighborhoods from new out-of-scale development
- Promote the preservation of existing single and multiple family neighborhoods
- The Design is not compatible with the existing neighborhood
- The Project does not minimize the number of windows and balconies looking into and overlooking interior private windows.

The “much needed new home ownership opportunities for the Silver Lake- Echo Park-Elysian Valley Community Plan” argument is actually pushing out long term residents via the Ellis Act for “million dollar small lot” homes that the current demographic can not afford. There are major inconsistencies with HCP policies and standard governing neighborhood character, design and most importantly, circulation and traffic safety on the common access driveway.

**B. The Design and Improvement of the Proposed Subdivision IS NOT CONSISTENT with the General Plan.**

Unfairly granting this subdivision not only allows the developers to exploit the Small Lot Ordinance so that they can *exceed* allowable density; it also unfairly devalues the surrounding homes with this massive out-of-scale construction that eradicates views and privacy, not to mention the displacement of working class

rent control tenants, adding to the sweep of destruction of affordable housing in greater Los Angeles.

***It is for these reasons that the Silver Lake Neighborhood Council is not in support of this small lot development.***

**C. The Site IS NOT PHYSICALLY SUITABLE for the Proposed Type of Development**

The proposed development at 1119 Sanborn grossly exceeds the limitations of the Small-Lot Subdivision requirements at the expense of the community. This lot is zoned RD2-1VL and is under 7700 square feet. In order to qualify for a 4-unit small lot subdivision it must be at least 8000 square feet. This development proposes to 'borrow' square footage from the the adjacent Wit Place to use as vehicle access for their new units and to gain enough land to meet the requirements for their four unit small project. Wit Place has been known locally as "Blood Alley" since at least the 1960's; traffic accidents are common, and the problems exacerbate quickly. Increased traffic from eight new permanent parking spaces only makes the existing dangers of "Blood Alley" worse. This is a clear negative impact on the community. **In addition, the cumulative effect of the growing density in The Silver Lake- Echo Park- Elysian Valley Community is a major negative impact- see attached documentation.**

For these developers to plan for parking garages accessed via Witt Place demonstrates their ignorance of the existing traffic hazards already present here. Their proposal further demonstrates their utter lack of understanding that the inherent increase in traffic will result in significantly more vehicle collisions, damage to personal property, and possible personal injury to pedestrians and motorists.

The Los Angeles Mobility Plan 2035 was approved by The City Planning Commission in December of 2015, and was adopted by The City Council in January of 2016. On page 19 there is a description of the various roads in the city of Los Angeles. The narrowest two-way road, called a 'service road', is a minimum of 20 feet wide; there are narrower service roads designated as one-way, but even a one-way street used for this purpose is commonly required to be at least 20 feet wide. Wit Place is a 15 foot 2-way alley, so narrow there isn't even a description of it in the current or past LA Mobility Plans.

This project warrants a thorough site study conducted by the Los Angeles Department of City Planning and the Department of Transportation to determine the impact of the four proposed two-car garages that would be accessed from Wit Place.

**D. The Site IS NOT PHYSICALLY SUITABLE for the Proposed Density of Development**

We seek to limit the development to three new homes, one home per 2000 square feet as per L.A. City ordinances. By reducing the number of homes built, we further seek to maintain prevailing setbacks and for the property to maintain the open yard on the west side of the property for emergency vehicle deployment. We further ask that you not approve this small-lot subdivision until after Wit Place is designated as an official one-way alley to mitigate these safety hazards.

Alternatively, the developers could re-design the project so that the parking spaces for these new homes are accessed via Sanborn Ave. The address of this property and the main entrance to the current building is on Sanborn Avenue, yet this development is adding eight parking spots and access to their new homes from Wit Place and not Sanborn Avenue.

Additionally, we ask that the developers change their north-facing picture windows to respect the privacy of those living in next door; or that they increase their northern setback so that privacy providing trees can be planted between the buildings to screen views into private homes.

**In the current proposed plans, these new homes are designed with north-facing windows which sit five feet from the property line and look directly into the windows of the adjacent apartment building at 1131 Sanborn.**

**G. The Design of the Subdivision and the Proposed Improvements WILL INDEED CONFLICT WITH EASEMENTS Aquired by the Public at Large for Access Through or Use of Property Within the Proposed Subdivision.**

This alley is a frontage road to Sunset at Sunset Junction, one of the busiest sections of the neighborhood. Sunset Junction has received national and international press, increasing the traffic to the businesses there exponentially. Wit Place is a relic from the turn of the century, and was never intended to handle the kind of pedestrian and vehicle traffic that it currently bears. Any increase will add to an already dangerous situation.

Witt Place is the rear loading area for all the retail stores on the 4000 block of Sunset Blvd. Commercial trucks often completely block passage through the alley when they park to load or unload. It is also the dumpster location for the large Sunset Blvd apartment buildings that back onto Wit Place. In addition, Wit Place ends downhill at another tiny street, Manzanita, which has no Sunset Blvd outlet except through the alley. There are houses along the north side of the alley that are "land locked" with only alley accessibility.

Because of all this, the alley is blocked much of the time by parked cars, garbage trucks emptying dumpsters, UPS trucks, delivery trucks, and the lift used to service the cell phone tower on Wit Place. Oftentimes vehicles get trapped and

must back up the entire length of the alley onto Manzanita or uphill towards Sanborn, across a heavily used sidewalk on a blind hill.

Because of all this, there has been great neighborhood concern for many years about fire safety and proper access for Fire Department vehicles along this busy corridor. Emergency vehicle access as it stands now is extremely tenuous. Additionally, Wit Place is a major thoroughfare for children leaving Thomas Starr King Middle School. Every weekday when school lets out, students pour down the alley on their way to Sunset Blvd. Some children access their bus stop on Sunset via their walk down Wit Place. It is vital for the safety of the student population at Thomas Starr King that traffic be reduced on Wit Place, certainly not increased.

Although the proposed development is in a fairly commercial area, the safety hazards to the neighbors living here, the cumulative effect of increased traffic and the invasion of privacy must be addressed. We are not against small lot developments per se, but this particular site is not suited to increased density because it exacerbates an already extremely hazardous situation.

Sincerely,

The Sanborn Avenue Neighbors Association

P.S. - Please enter attached letter on Small Lot Subdivision cumulative traffic impacts and supporting photographs of Wit Place into the record.

## **HERMAN BASMACIYAN, P.E.**

**Traffic, Transportation, Parking  
Expert Witness and Consulting Services  
701 Marguerite Avenue  
Corona del Mar, CA 92625  
Tel: 949-903-5738  
herman.b@roadrunner.com**

July 16, 2015

The Silverstein Law Firm, APC  
215 North Marengo Avenue, 3rd Floor  
Pasadena, CA 91101-1504  
Att: Mr. Brady S. Torgan, AICP

Project Number: 150602

Subject: Case No. VTT-72367-SL, 2925 W. Waverly Dr, 90039

Dear Mr. Torgan:

In response to your request, I have reviewed the potential cumulative traffic impacts in the Silver Lake area of the City of Los Angeles, specifically related to the proposed Small Lot (SL) development at 2925 W. Waverly Drive. The proposed development would consist of five single family dwelling units. In accordance with the Policies and Procedures of the Los Angeles Department of Transportation (LADOT), the proposed development would not, by itself, add sufficient vehicular traffic to the street system. Therefore, an analysis of the project-specific traffic impacts of the proposed development was not required by the City.

However, a multitude of single family and multi-family residential units have either been completed recently or are in various stages of the planning process in the Silver Lake area. To our knowledge (there may be additional units as yet unknown to us), within an approximately two-mile radius of the proposed project, these known development proposals have recently added, or would add a total of 131 single family and 96 multi-family residential units.

Cumulatively, these known 227 single family and multi-family units, plus the proposed project would add approximately 1900 daily vehicular trips on a weekday. About 150 vehicular trips in the morning peak hour and about 140 in the afternoon peak hour would be added to the street system in the area. For an individual project with this level of traffic generation, the LADOT would require the preparation of a Traffic Study for the evaluation of potential traffic impacts because the amount of traffic would exceed the threshold of 43 trips in the peak hour established by the LADOT (as stated on Page 5 of the LADOT Traffic Study Policies and Procedures, please refer to two pages following

The Silverstein Law Firm, Attn: Mr. Brad Torgan

Exhibits I and II). Yet, the potential impacts of these related projects, taken cumulatively, are not addressed in the Mitigated Negative Declaration (MND) for the proposed development at 2925 W. Waverly Drive. A list of the known related projects and the computation of the added traffic are presented in attached Exhibits I and II, respectively.

The following types of potential cumulative traffic impacts could occur within the area roughly bounded by Interstate 5 (I-5) on the North, State Route 2 (SR-2) and Glendale Boulevard on the East, State Route 101 (SR-101) on the South, and Vermont Avenue on the West:

- A. Level of Service (LOS) impacts at signalized intersections, for example, and without limitation, the intersections of: Glendale Boulevard/Waverly Drive/Rokeby Street; Glendale Boulevard/Silver Ridge Street/Fletcher Drive; Glendale Boulevard and Silver Lake Boulevard; Glendale Boulevard and Berkeley Avenue
- B. LOS impacts on Caltrans facilities: I-5, SR-101, and SR-2 Freeways; as well as freeway ramp terminals because about 150 new peak hourly trips will be generated by the cumulative developments. Based on likely travel patterns, many of them will use the freeways, especially SR-2 and I-5 serving the area and trigger the need for consultation with Caltrans and analysis of these facilities per the Memorandum of Understanding between the City of Los Angeles and Caltrans on the subject of traffic study requirements for Caltrans facilities. In addition, the southbound SR-2 exit ramp terminal at Glendale Avenue/Waterloo Street/Fargo Street (especially important because the intersection has marked school crossings on Glendale Boulevard and on Fargo Street) and the intersection of Alessandro Street at the start of the northbound SR-2 Freeway could be impacted. The southbound I-5 exit ramp terminal on Riverside Drive and the I-5 southbound entrance ramp terminal on Riverside Drive could also be impacted.
- C. Traffic operational and safety considerations at unsignalized intersections, for example, and without limitation, the intersections of: Alessandro Street and Duane Street; Glendale Boulevard and Farwell Avenue; Glendale Boulevard and Brandon Street (especially important because of the presence of a marked crosswalk across Glendale Boulevard); Glendale Boulevard and Aaron Street; Waverly Drive and Herkimer Street; Waverly Drive and Avenel Street; Glendale Boulevard and Farwell Avenue
- D. LOS impacts at Congestion Management Program (CMP) monitoring intersections and/or on CMP facilities, including I-5, SR-101, and SR-2, that operate under congested conditions during either the morning or afternoon peak hours, or both in the morning and afternoon peak hours. The Los Angeles County Metropolitan Transportation Authority (LAMTA) CMP document indicates that the SR-101 and I-5 Freeways operate under LOS F conditions both in the morning and afternoon peak hours. The portion of SR-2 south of I-5 operates at LOS F in the morning peak hour.
- E. Addition of vehicular traffic on local streets such as Waverly Drive, Farwell Avenue, and Del Mar Avenue; among others
- F. Increased potential conflicts between vehicular and pedestrian/bicycle traffic such as the intersection of Glendale Boulevard and Deane Street; ; Glendale Boulevard and Brandon Street; Glendale Avenue/Waterloo Street/Fargo Street; among others

Page of 3

The Silverstein Law Firm, Att: Mr. Brad Torgan

A Transportation Specific Plan (TSP) does not appear to have been established for the Silver Lake area. Without such a plan, individual projects may not be required to pay traffic impact fees that can be used for roadway and traffic signal system improvements in the area. As a result, traffic volumes would continue to increase with each development that is approved, without a dedicated funding source to make needed improvements.

In preparing this letter, I have referred to the following documents:

- Traffic Study Policies and Procedures, LADOT, 2014
- 2013 Traffic Volumes on the California State Highway System
- Community Plan for Silver Lake - Echo Park - Elysian Valley
- City of Los Angeles CEQA Thresholds, Section L. Transportation
- List of Related Projects and Map, based upon information obtained from City of Los Angeles and other public sources

To conclude, based upon my analysis of the facts and data regarding the proliferation of past, present and reasonably foreseeable development projects in the Silver Lake area, and specifically within an approximately 2-mile radius of the subject project, and further based upon my experience as a traffic engineer, a fair argument exists that the subject project, in combination with the proliferation of other projects in the vicinity, may cause and contribute to significant, unmitigable cumulative traffic impacts, and at various locations cumulative pedestrian safety impacts, which should require the preparation of an Environmental Impact Report to properly disclose, study and mitigate these significant cumulative impacts.

I am a Civil and Traffic engineer Registered in California with over 50 years of experience in the field of transportation and traffic engineering. My c.v. is attached for your use as needed.

Please contact me if I can provide further details or answer any questions about this matter.

Sincerely,

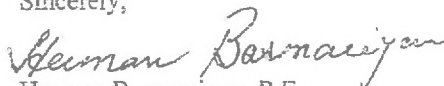
  
Herman Basmaciyen, P.E.

EXHIBIT I				
PROPOSED/PLANNED, UNDER CONSTRUCTION, AND RECENTLY COMPLETED RESIDENTIAL PROJECTS WITHIN TWO MILES OF 2925 WAVERLY				
Ref. No. (a)	Address	Comments	SF	MF
B	2241 Hyperion Ave.	Hearing on 7/15/15	8	
C	2420 Hyperion Ave.	Hearing on 7/15/15	6	
6	2905 Waverly Dr.	DAA determination 6/2/15	9	
7	2220 Duane St.	Completed in 2014		63
8	2753 Waverly	SLS	70	
9	2920 Rowena			33
10	Back side of Silverlake	Small lot subdivision, under construction	9	
19	1628 Micheltorena	DAA Hearing 7/1/15	4	
20	722 N. Lucile Ave	Under construction	7	
24	2250 Fargo St	AA-2005-3465-PMLA-SL, DAA determination 9/15/05	3	
25	2240 Fargo St.	Built before 2012	3	
29	2844 W. Rowena Ave.	VTT-71566-SL, DAA determination 9/23/11 2844 W Rowena Ave, 90039	6	
41	2722 Auburn	Under construction	6	
TOTAL			131	96
(a) Map reference number - please see map attached to Appeal Letter.				

# EXHIBIT II

## ESTIMATED TRIPS FOR PROPOSED PROJECT AND RELATED PROJECTS WITHIN TWO MILES OF 2925 WAVERLY

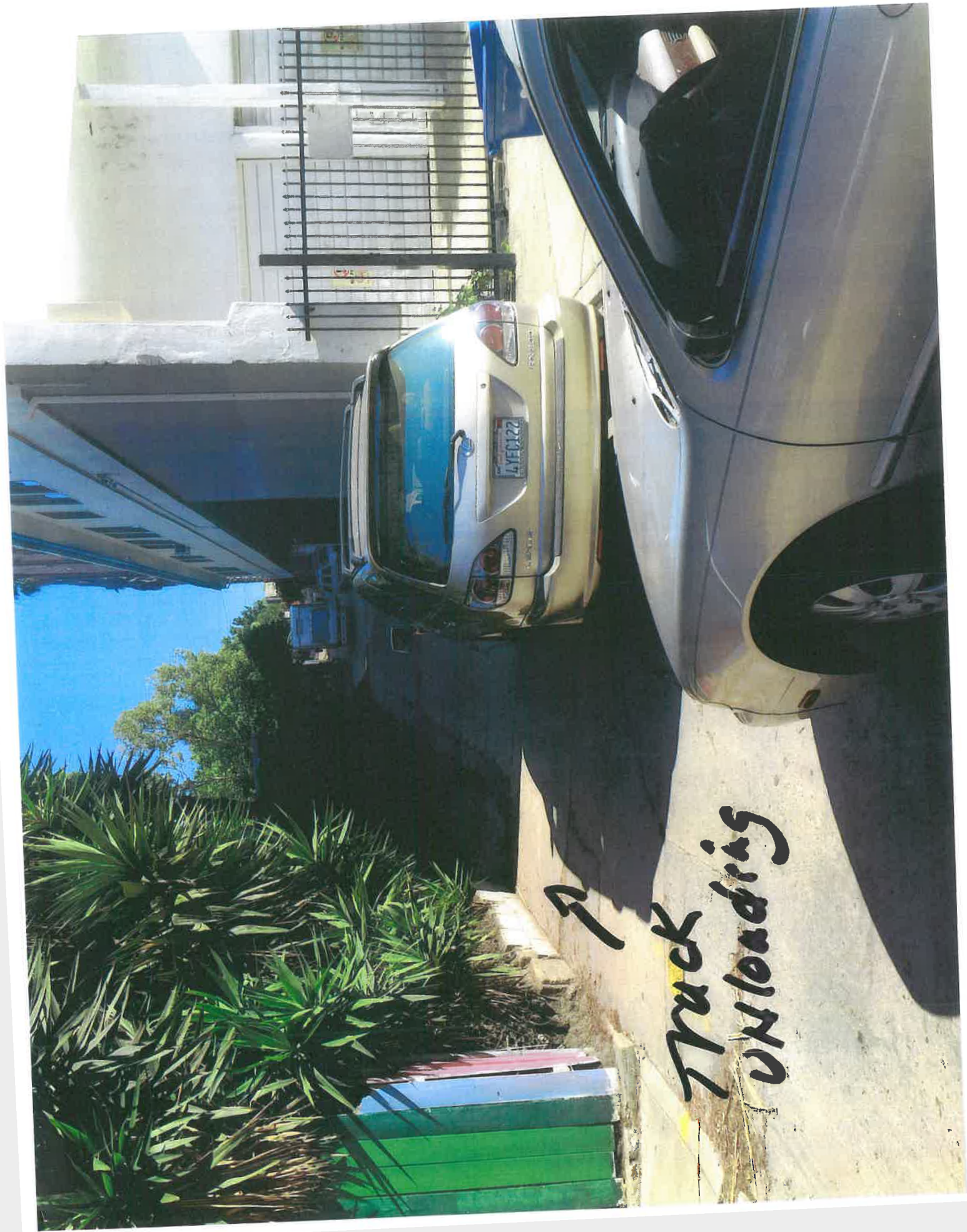
	Number of DUs	Number of Trips Based on trip Rates in Lower Portion of Table						
		Daily	AM Peak			PM Peak		
			Total	Inbound	Outbound	Total	Inbound	Outbound
Single Family DUs for Cumulative Projects	117	1,170	94	28	66	82	57	25
Multi Family DUs for Cumulative Projects	96	638	49	10	39	47	31	16
Subtotal	213	1,808	143	38	105	129	88	41
Single Family DUs for 2240 and 2241 Hyperion	14	93	7	1	6	7	4	2
Total for Proposed Project and Related Projects	227	1902	150	39	110	136	92	43

	Trip Rates						
	Daily	AM Peak			PM Peak		
		Total	Inbound	Outbound	Total	Inbound	Outbound
Single Family DUs (a)	10.00	0.80	0.24	0.56	0.70	0.49	0.21
Multi Family DUs (b)	6.65	0.51	0.10	0.41	0.49	0.32	0.17

(a) The daily trip rate for this category is taken from the Traffic Analysis Report for Picasso Brentwood-from Cumulative Analysis P.47, in turn taken from ITE. The peak hourly rates are those published by SANDAG, recognized by LADOT as an alternative source

(b) All rates for this category are taken from the Traffic Analysis Report for Picasso Brentwood-from Cumulative Analysis P.47 in turn taken from ITE.

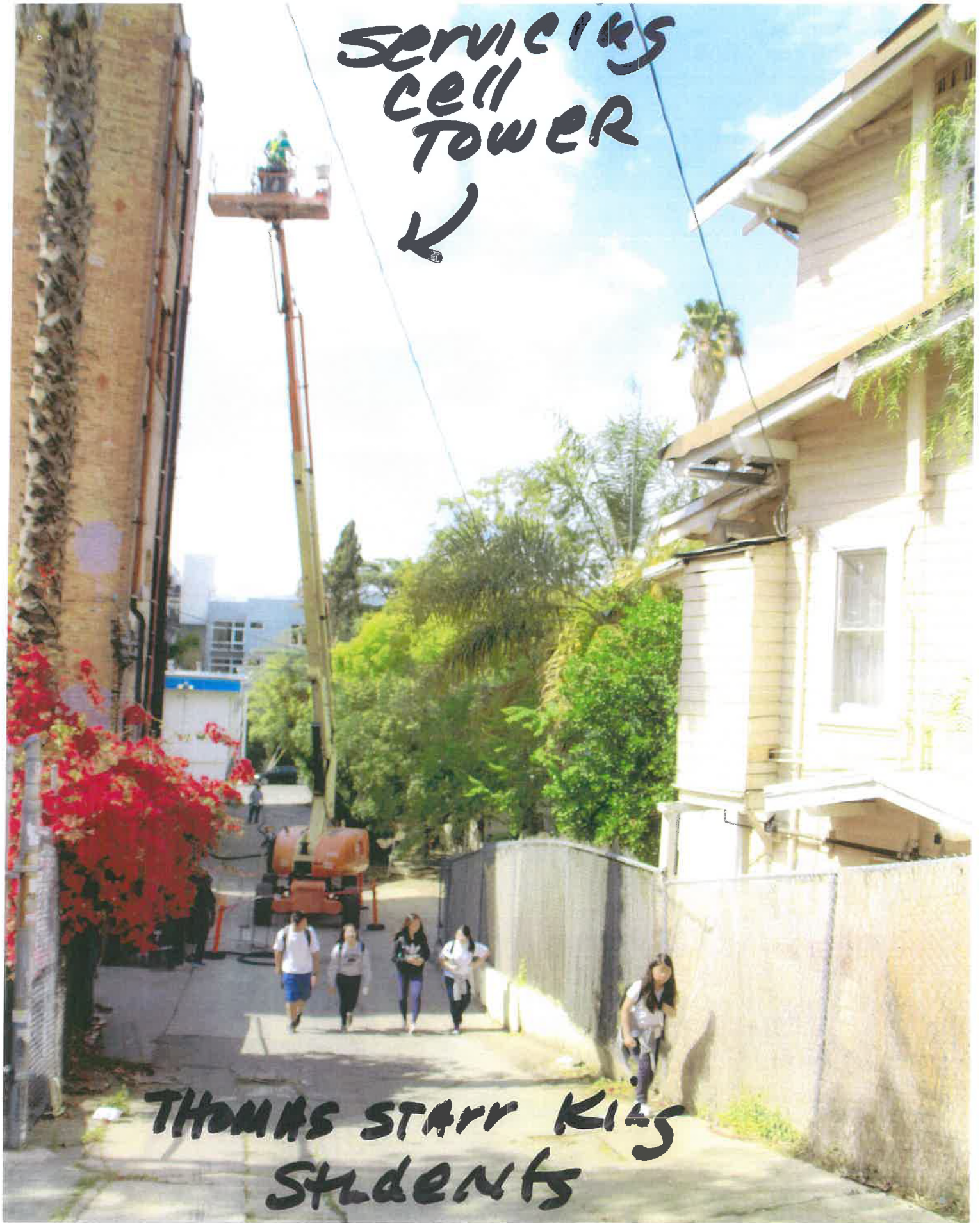
**Note:** DU means Dwelling Unit



SERVICING  
CELL  
TOWER



THOMAS STARR KING  
STUDENTS



POTENTIAL  
8 more  
parking spaces?

Marguerite  
St

garbage

Loading

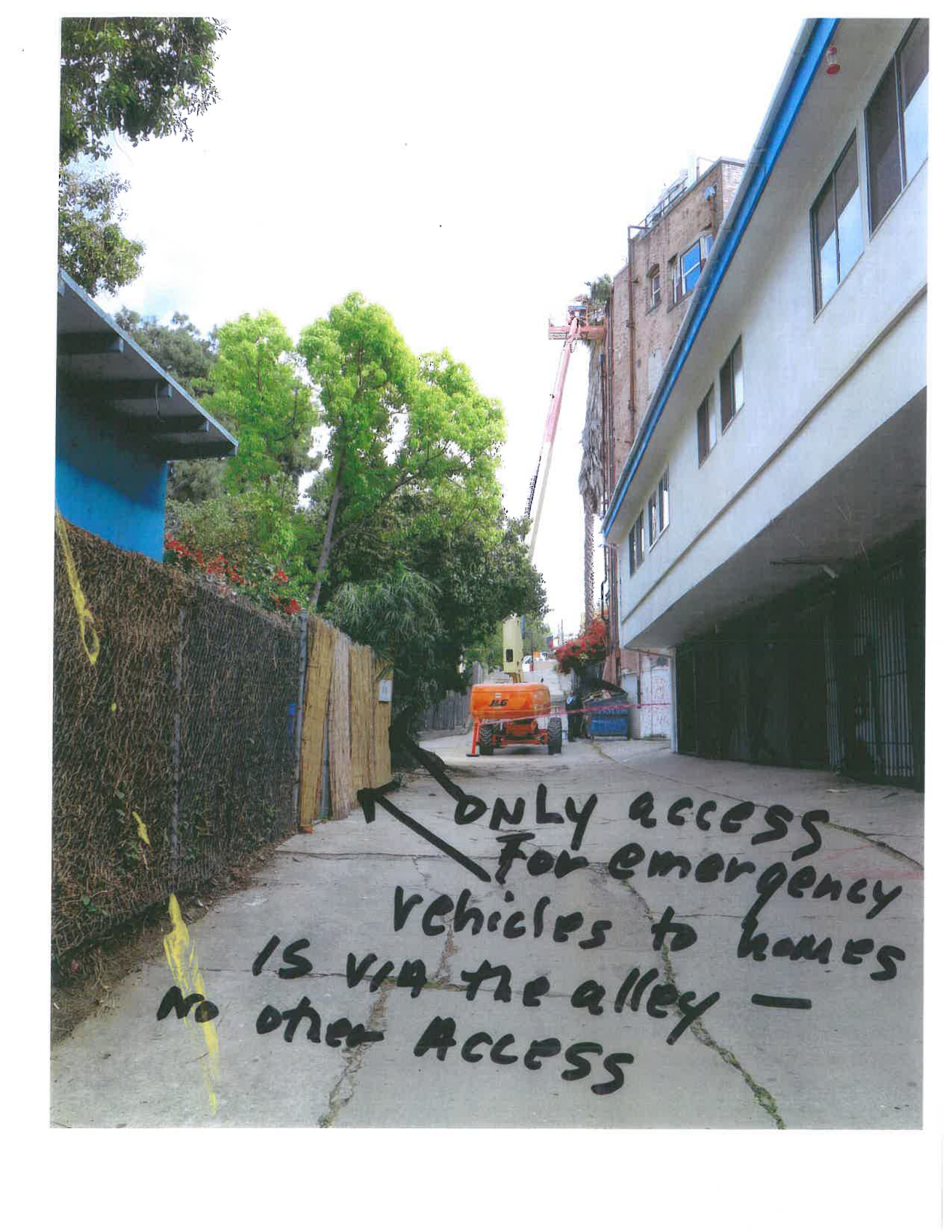
15'

cell phone  
tower

architectural  
detail narrow  
alley

Blind  
Hill

CURRENTLY  
TWO WAY STREET



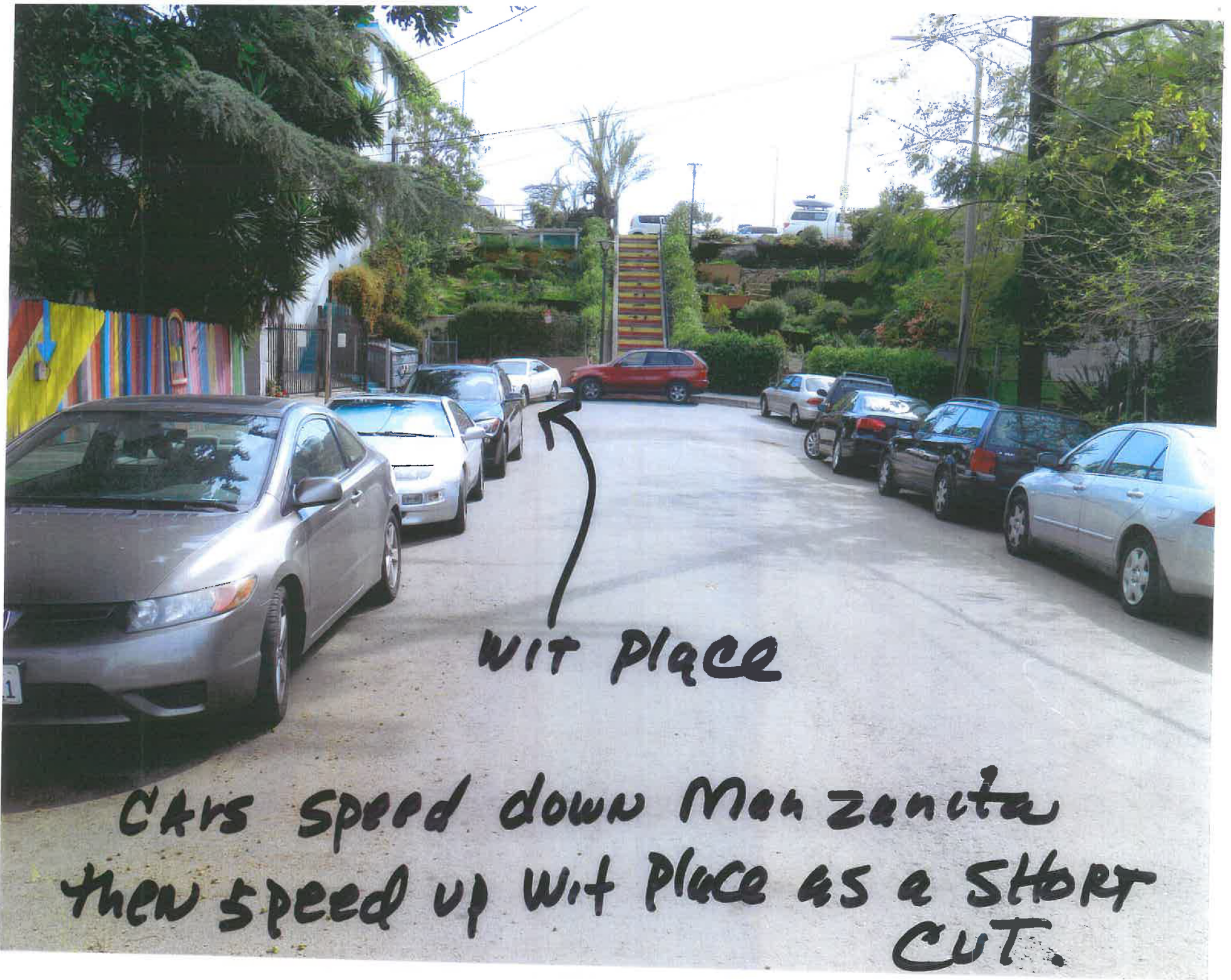
ONLY access  
for emergency  
vehicles to homes  
is via the alley —  
no other ACCESS



Students  
After  
School



unloading For  
Mohawk Clothing +  
other Businesses 5-10 trucks  
DAILY



WIT PLACE

CARS speed down Manzanita  
then speed up Wit Place as a SHORT  
CUT.

sticks  
into alley  
and trucks  
repeatedly  
HIT  
IT

