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July 27, 2010

VIA HAND DELIVERY

PLUM Committee
Honorable Ed P. Reyes, Chair
Honorable Jose Huizar
Honorable Paul Krekorian
Los Angeles City Hall, 3rd Floor
200 North Spring Street
Los Angeles, CA 90012

Date: 7-27-10

Submitted in PLUM Committee

Council File No: 10-1202

Item No.: 7

~~Deputy~~ Submitted by Appellant

Re: Appeal of EastWest Studios LLC re:
Emerson College: 5960 W. Sunset Boulevard, Los Angeles 90028
Case No. CPC 2009-2504-GPA-ZC-HD-SPR-GB; ENV-2009-0469-EIR

Honorable PLUM Committee Members:

This firm and the undersigned represent EastWest Studios in conjunction with the proposed Emerson College project ("proposed Project"). EastWest is a culturally and historically significant resource in Hollywood, located immediately west of the proposed Project, across Gordon Street. In its recent Historic Resources Survey for the Hollywood Redevelopment Plan Area, the CRA reconfirmed that EastWest is eligible for National Register status.

EastWest Studios ("EastWest") filed its appeal on June 29, 2010, indicating that the City Planning Commission's approvals and its findings for the proposed Project constitute a prejudicial abuse of discretion, including in violation of the California Environmental Quality Act ("CEQA"). The proposed Project's admittedly significant construction noise and vibration impacts on EastWest have not been properly analyzed or mitigated.

Further, the approvals and findings violate Section 556 of the Los Angeles City Charter with respect to requirements of consistency between the proposed Project and the Los Angeles General Plan. Feasible mitigation measures exist to address the very real and direct adverse impacts to the environment and to EastWest, but the City Planning

Department and Planning Commission refused to impose as a condition of Project approval adequate and feasible mitigation measures.

In furtherance of EastWest's appeal of the City Planning Commission's approvals for the proposed Project, we submit these further objections. Throughout this correspondence, the Draft EIR and Final EIR may collectively be referred to as the EIR.

I. Vibration And Noise Impacts Have Not Been Sufficiently Analyzed Or Mitigated.

Throughout the Final EIR, the City is almost dismissive of the fundamental underlying truths with respect to EastWest. A recording studio is intensively sensitive to noise and vibration. The noise and vibration resulting from excavation, site grading and construction will lead to significant adverse impacts on EastWest's operations, potentially to the point of forcing it out of business.

The Final EIR implies that most of the studio's operations occur at night or on weekends. (Response 7.41, FEIR, p. III-54.) This is simply not true. "Lock-out status" does not limit recording activity to nights and Sundays. Musicians work during normal business hours. Moreover, a large part of EastWest's business includes creating sampling software and related noise-sensitive activities. These activities also occur during normal business hours.

EastWest has undertaken an acoustical study, a copy of which is attached hereto as **Exhibit A**. The study, conducted by ATS Consulting, concludes the following:

1. The impact criteria for vibration are not appropriate for recording studios. The EIR uses the Federal Railroad Administration (FRA) criteria for Category 3 institutional uses to determine whether the proposed Project will cause a vibration impact. This ignores the fact that the FRA handbook outlines specific criteria for recording studios, which are much more sensitive to vibration and ground-borne noise than other institutional uses like churches and schools.
2. The predictions for construction noise only consider hourly Leq averages and do not consider the maximum sound levels (Lmax) that can be generated.
3. The By-Right and the Reduced Density Alternatives would have shortened construction durations, and would therefore have less of an impact on EastWest Recording Studios.

4. Both construction noise and construction vibration “cannot be reduced to below significance thresholds” at the EastWest Studios through the proposed mitigation measures and alternative ways of reducing the environmental impacts of the proposed Project, such as restricting construction times, must be considered.

The acoustical study also notes that the source of the noise and vibration is a major factor in the severity of the impact. Quite simply, impulsive noise from the proposed Project site and haul trucks using Gordon will have a far greater adverse impact on EastWest than, for example, a bus on Sunset. This is because the A-weighted scheme used in the EIR analysis is insufficient to determine the effect of external events on noise levels within the studio. While the A-weighting scale is sufficient for determining human annoyance, it is not suitable for specialized building uses such as recording studios where low-frequency sounds (which are deemphasized by the A-weighting scale) are an important consideration.

With respect to conclusion number 4, there are additional feasible mitigation measures that should be implemented and currently proposed mitigation measures that can feasibly be amended to further reduce impacts, even though ultimately their application will still not reduce noise and vibration impacts below a level of significance. These additional mitigation measures or changes to proposed mitigation measures are identified in the bullet points below.¹

¹ It should be noted that on July 26, 2010, City Hearing Officer Craig Weber emailed with additional mitigation measures that “have been identified that may aid in reducing potentially significant noise and vibration impacts associated with the construction of the Emerson College campus. Planning staff have analyzed mitigation measures recommended by the appellant’s noise consultant, and have integrated the new measures into the project’s Conditions of Approval and Mitigation Monitoring and Reporting Program to the best extent feasible.” These are positive developments which EastWest appreciates. We are still going through these new materials, but preliminarily, we mention the following: (1) For haul routes, K-2 (7:00 a.m.) needs to be conformed to F-2 (6 a.m.) I believe this was simply an oversight; (2) Under condition F-2 (and any other place where the Saturday construction times are mentioned), the same end-time for noise- and vibration-causing activities is needed. That is 12:00 p.m. The studios operate every day. For these measures to be of any assistance (they will only mitigate, but not eliminate, the significant impacts on EastWest), a consistent 12:00 p.m. cut-off time is essential. Quieter work could continue after noon, just not heavy work that could cause noise and vibration impacts to the studios. In conjunction with other mitigation measures still to be agreed upon, a strict noon cut-off time is a compromise EastWest can live with. It will still cost EastWest business, but enough should remain to survive the construction; (3) For condition F-9, the language regarding “minimizing to the greatest extent feasible” the use of steel

- Mitigation Measure F-2 should be changed to restrict demolition and construction to the hours of 6:00 a.m. to 12:00 p.m. Monday through Friday, with the noon cut-off time applying on Saturdays as well.

Regarding the construction timing issue, contrary to arguments that have been made by counsel for Emerson during the administrative proceedings, a start time earlier than 7:00 a.m. would not require action on the part of the City Council to amend the City's Construction Noise Ordinance. The ordinance contains a provision that allows for exceptions to the general prohibition on noise-generating construction and excavation activity before 7:00 a.m. Pursuant to Los Angeles Municipal Code Section 41.40(b), an applicant can submit an application to the Board of Police Commissioners seeking permission to engage in construction or excavation activities before 7:00 a.m. The Board may grant permission "where the work proposed to be done is in the public interest, or where hardship or injustice, or unreasonable delay would result . . ." The language of that Section does not require that hardship accrue to the applicant. Findings could be made that a hardship accrues to a neighboring business whose business activity is noise- or vibration-sensitive, and where, as here, an earlier end-time is sought. No special application form is required. The request must be in writing and there is a \$350 application fee. The Board of Police Commissioners generally holds a public hearing on the request within a month of receipt.

A similar process holds true for requests to deviate from 3:00 p.m. to 9:00 a.m. haul route time prohibitions. Currently, the Department of Building and Safety processes the requests for the Board of Police Commissioners. We understand that the Department of City Planning is expected to take over both processing and approval authority for haul route requests this fall.

- Similarly, Mitigation Measure K-2 should be revised to allow for hours of operation from 6:00 a.m. to 12:00 p.m.
- Mitigation Measure F-12 should be changed to require the contractor to retain a neutral noise and vibration consultant, not just a vibration consultant as is currently proposed in F-12, acceptable to both the contractor and EastWest.

plates on Gordon Street or Sunset within 100 feet of the studios, is difficult to define or make effective. The prohibition of such plates within 100 feet is what is sought.

- Install internal and external noise and vibration monitors to monitor noise continuously during the construction process to measure whether construction activities cause internal noise and vibration levels to exceed the initial internal noise and vibration levels. This differs from proposed Mitigation Measure F-12, in that there should be both noise and vibration monitors, and they should be monitored continuously, not just periodically.
- Video cameras will be used to provide a visual record of what caused any breach of the noise and vibration thresholds. Audio monitoring and recording should also be used to help identify offending noise sources.
- Pre-construction tests should be performed to establish the maximum sound and vibration levels that could be generated by the project without affecting the internal noise and vibration levels.
- The requirement in Mitigation Measure F-7 that temporary noise barriers be erected for stationary equipment that is stationary and operating continuously for more than one day should include minimum requirements for the noise barriers. For example, the noise barriers should be constructed of a material that has a minimum Sound Transmission Class (STC) rating of 30, the barrier should be sufficiently high to block the direct path between all parts of the construction equipment and sensitive receivers such as EastWest, and should have all gaps between barrier panels and at the bottom of the barrier sealed to avoid sound leaks.
- As described in the Department of City Planning's recommendation report, notice should be given with regard to the construction plan a full 90 days in advance of activities. In addition, if the contractor is unable to meet the schedule, it should be at EastWest's discretion as to whether the specified construction activity may proceed without interrupting studio operations. In addition, lane closures on Gordon should not include using it as a haul route. No staging of trucks or other heavy equipment or machinery should be allowed to be used on or facing Gordon Street. No steel plates should be installed on Gordon or on Sunset within 100 feet of the studio.

- Mitigation Measure F-14 should be changed to require a sound curtain to a height of 20 feet above grade. The barrier material should have a minimum STC rating of 30.

The Department of City Planning recommends installing an 8 foot high temporary sound barrier during the excavation and foundation construction phase regardless of the initial noise levels. In order to better block the line of sight between the recording studio and the construction site, a higher wall would be necessary. Temporary sound walls using loaded vinyl “curtains” of up to 20 feet high are available and can be installed on K-rail traffic barriers with a limited footprint. In addition to reducing construction noise during these phases, the wall might somewhat also help limit the dust that affects the studio.

EastWest has also offered Emerson access to the site for its own sound measurements once appropriate protocols are in place, and assuming that a 12:00 p.m. noise and vibration cut-off time is imposed.

II. The City Has Not Made Sufficient Findings Of Consistency With The General Plan.

The Draft EIR notes that the General Plan Framework Element is a strategy for long-term growth which sets a city-wide context to guide and update community plans and city-wide elements. DEIR, p. IV.H-8. What this phrase indicates is that the Framework Element provides the over-arching policies by which consistency must be measured. The EIR fails in its analysis in this respect, and proper findings of consistency, required under Section 556 of the Los Angeles City Charter (“Charter”), are missing.

As explained in the analysis of Richard H. Platkin, AICP, a planning consultant whose experience includes 20 years with the Los Angeles Department of City Planning, the Framework Element is a growth-neutral policy document, meaning it is neither anti-growth nor pro-growth. Instead, the context it provides is to accommodate growth if/when underlying demographic trends and related demand for public services and infrastructure so warrant. (Memorandum, Richard Platkin to Robert Silverstein, June 30, 2010 at pp. 4-5 [“Platkin Memo”], attached hereto as **Exhibit B.**)

Within this context, the City must establish two claims in order to show a change in a land use designation is consistent with the Framework Element. First, the City must show that there are changes in local growth conditions (i.e. population, jobs, housing, and

traffic) from the time of the adoption of the Framework Element that render the Framework Element and the Hollywood Community Plan policies and implementation provisions inadequate and obsolete. (Platkin Memo at p. 6.) Second, the City must establish mid-course monitoring of the effectiveness of the General Plan's goals, objectives, and policies. As stated by Mr. Platkin:

It is not enough to simply monitor growth trends and infrastructure construction. If this mid-course monitoring determines that application of General Plan implementation tools, specifically its land use plan designations and its corresponding zoning, have not succeeded in achieving the plan's goals, objectives, and policies, then appropriate consistency finding could be made for changes to those designations and zoning. (Id.)

Neither of these claims, however, has been established. To the contrary, demographic data from the Planning Department indicates that General Plan population and housing forecasts made in 1990 were hugely overestimated. (Platkin Memo at pp. 7-8.) In context, this means there is a large unmet growth capacity under existing land use designations in the Hollywood Community Plan. This precludes findings of consistency with the Framework Element for changes in land use designations.

Findings that the proposed Project is consistent with other selective policies from the General Plan do not change this. The proposed Project may make for an attractive educational facility, but findings of consistency cannot be made with respect to the central and overarching policy position of the Framework Element.

With respect to specific claims in Response 7.50, it is simply not correct that the impact of the loss of land designated "Industrial" and "Limited Manufacturing" in the Hollywood Community Plan area has been analyzed. Simply stating that the zoning is inconsistent with the "Limited Manufacturing" land use designation does not address the impact of the loss of land so designated. As an additional result, General Plan consistency findings required under Charter Section 556 cannot be made.

Findings of consistency with the Industrial Land Use Policy also cannot be made based on Response 7.50 itself. The response correctly notes that "[t]he purpose of the Industrial Land Use Policy is to preserve industrial land for manufacturing uses." If land designated for industrial use has that designation removed, it is no longer available for

manufacturing uses and is in conflict with the policy. It is not “irrelevant” for CEQA purposes, as the response claims.

III. The EIR Improperly Defers Analysis Of Impacts On Infrastructure, Including The Sewer System.

A review of the Draft EIR and Final EIR by Bonneau Dickson, P.E., a consulting sanitary engineer with over 30 years experience, shows serious and substantial flaws in those documents with respect to analysis of wastewater and sewer infrastructure impacts. Not only is the analysis in the EIR insufficient to reach a conclusion of no significant impact, but such a conclusion may actually be contrary to evidence presented in the EIR. At best, the EIR has improperly deferred analysis of sewage flows. At worst, the EIR has failed to identify and analyze sewer system improvements that will be necessary to accommodate the proposed Project. A copy of Mr. Dickson’s analysis is attached as **Exhibit C**.

As a preliminary matter, the project description is inadequate with respect to the location of sewage discharge for the proposed Project. The building drain(s) could be connected to the sewer in Sunset Boulevard, to the sewer in Gordon Street, or to both. Since the point of connection is unknown, the effect on the sewer system cannot be adequately determined.

Compounding this problem is insufficient information about the sewer system. According to the Final EIR, no gauging is available for three of the nine sewer pipes relevant to the proposed project. FEIR p. III-6. Yet, that information is necessary for the environmental setting. Without that information, there is no baseline against which to analyze the proposed Project’s impacts on the sewer system. Moreover, the Bureau of Sanitation’s description of the sewer system in the vicinity refers to a number of flow splits. No information, though, is given as to how much of the sewage flow is directed to each of the pipes among which the sewage flow is split, making it even more difficult to determine whether the capacities of the respective pipes are adequate for additional sewage.

Response to Comment 3.3 in the Final EIR admits this, stating that “with regard to the current flow measurements, the Draft EIR acknowledged that the final approval for sewer capacity would need to be made during the permit process.” This is classic deferred study and deferred mitigation, which are prohibited under CEQA.

More troubling, the description of the sewer splits in the vicinity of the proposed Project actually provides evidence to the contrary of a conclusion of no significant impact. Flows in a gravity sewer system are very rarely split. When done, it is usually the result of capacity issues in one or more of the sewer lines involved. This too, the Final EIR acknowledges: "If the public sewer has insufficient capacity then the developer would be required to build sewer lines to a point in the sewer system with sufficient capacity." FEIR p. I-44. See also DEIR p. IV.I-24.

Here, because of the evidence of inadequate capacity, the EIR must also analyze the reasonably foreseeable sewer construction that may be necessitated by construction of the proposed Project. The only discussion in the Draft EIR is "[t]he installation of a secondary line, if needed, would require minimal trenching and pipeline installation and would not result in any adverse environmental impacts." DEIR p. IV.I-24. There is no evidence whatsoever to support this conclusion. A major sewer construction project might be required. A sewer from the proposed site westward on Sunset Boulevard to Vine Street and southward on Vine Street to Melrose Avenue would be approximately 1.2 miles long, and an even longer sewer project might be necessary. Such a sewer project would result in significant noise, air quality and traffic impacts, none of which have been identified, studied, or mitigated, thus rendering the EIR legally inadequate on this additional ground.

IV. The EIR Has Not Analyzed A Reasonable Range Of Alternatives.

The Draft EIR dismisses a Reduced Density alternative from further analysis essentially based on two assertions: (1) from an economic standpoint, it would allegedly be economically infeasible because it would require Emerson College to maintain two separate facilities; and (2) from an organizational standpoint, it would generate additional VMT as it would require students to commute back and forth between residences at the Burbank facility and the proposed Project site in Hollywood. There is a total lack of substantial evidence in the record, however, to support either assertion.

With respect to economic viability, a claim of financial infeasibility must be supported by evidence in the record. See Association of Irrigated Residents v. County of Madera (2003) 107 Cal.App.4th 1383. No such evidence has been presented. Additionally, greater expense, in and of itself, is not the same as financial infeasibility:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the

discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, *or would be more costly*. (CEQA Guidelines, § 15126.6(b) [emphasis added].)

Likewise, there is no evidence in the record to support an assertion that a Reduced Density Alternative would generate additional VMT. First, there are academic facilities as part of the Burbank facility. Second, and perhaps more importantly, we are provided with no information as to where the location of the internships are. Asserting an increase in VMT assumes that all the internships are in close proximity to the proposed Project site. Yet Warner Brothers, Disney and Universal Studios, as examples, are all within walking distance of the Burbank facility.

(See (<http://www.emerson.edu/sites/default/files/hollywood-report-spring-2010.pdf>, p.6, accessed July 21, 2010.)

Depending on the location of the internships, the proposed Project could generate more VMT than a Reduced Density alternative. Given lack of evidence to substantiate assertions of infeasibility, the EIR must analyze a Reduced Density alternative as part of a reasonable range of alternatives.

The evidence to support the rejection of alternative sites is also insufficient. The EIR obliquely refers to rejected alternative sites in downtown Los Angeles, North Hollywood and Culver City. They appear to have been rejected because those communities are not as highly identified with the entertainment industry as Hollywood, are not as centrally located to internship sites as Hollywood, and do not provide as many nearby social and recreational opportunities for college seniors as Hollywood. (DEIR p. VI-4.) Not only are we provided with no evidence to support these assertions, they have, with the possible exception of the second criteria, nothing to do with the proposed Project objectives.

Alternatives analysis, including alternative sites analysis, involves a determination of whether the alternatives could feasibly accomplish most of the basic objectives of the project and avoid or substantially lessen one or more of the significant effects. (CEQA Guidelines, § 15126.6(c).) The absence of this required analysis for rejected sites is a deficiency that must be remedied before the EIR can even be considered for certification.

The EIR also fails to identify and analyze a reasonable range of alternatives by failing to analyze an alternative that locates residential use on the proposed Project site, while making use of nearby locations for administrative, academic and support facilities. There is a substantial amount of space available or entitled in the vicinity of the proposed Project site potentially available for those non-residential uses such as, for example, the nearby Columbia Square project. Such an alternative would feasibly accomplish most of the basic objectives of the project and avoid or substantially lessen one or more of the significant effects.

In conclusion, we respectfully request denial of all discretionary approvals sought, including certification of the EIR.

EastWest is a recognized historic icon eligible for listing on the National Register. At the very minimum, when a project such as that proposed by Emerson seeks vast exemptions from current General Plan and zoning regulations, it is fair and reasonable for the City to require more protective mitigation measures to protect those existing and historic stakeholders, like EastWest, that will be significantly damaged by the proposed Project. A required mitigation measure limiting noise- and vibration-causing site clearance, excavation, and construction activities to the hours of 6:00 a.m. to 12:00 p.m. so that EastWest can attempt to minimize the damages it will suffer is but one of the mitigation measures that should be imposed as a condition of approval.

Very truly yours,



ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM

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MEMORANDUM

To: Robert Silverstein, The Silverstein Law Firm
Doug Rogers, EastWest Recording Studios

From: Zack Dennis
Hugh Saurenman
ATS Consulting

Date: July 25, 2010

Subject: EastWest Studio Measurement Results

INTRODUCTION AND SUMMARY

Two sets of measurements were performed at EastWest Studios. The first set of measurements was of noise and vibration and was performed in order to verify the assumptions used in the Emerson College Los Angeles Center Project Environmental Impact Report (EIR), and Final Environmental Impact Report (FEIR) (collectively EIR). The second measurement was of noise only and was performed to provide a more accurate determination of the ambient noise level inside the studio and to provide more specific information about how much noise from outside events penetrates the studio.

ATS Consulting performed a review of the EIR, summarized in our earlier report dated May 12, 2010. The primary conclusions of our review were:

- The impact criteria for vibration are not appropriate for recording studios. The EIR uses the Federal Railroad Administration (FRA) criteria for Category 3 institutional uses to determine whether the project will cause a vibration impact. This ignores the fact that the FRA handbook outlines *specific* criteria for recording studios, which are much more sensitive to vibration and ground-borne noise than other institutional uses like churches and schools.
- The predictions for construction noise only consider hourly Leq averages and do not consider the maximum sound levels (Lmax) that can be generated.
- The By-Right and the Reduced Density Alternatives would have shortened construction durations, and would therefore have less of an impact on EastWest Recording Studios.
- Both construction noise and construction vibration "...cannot be reduced to below significance thresholds" at the East West Studio through the proposed mitigation measures and alternative ways of reducing the environmental impacts of the project, such as restricting construction times, must be considered.

The EIR used several assumptions about noise and vibration to develop predictions of the noise and vibration levels generated by the project. Our measurements were performed to verify the assumptions used and to help understand the specific effect of construction activities on EastWest Studios. The ambient noise measurement sites are shown below in Figure 1, and the studio noise measurement sites are shown in Figure 2.

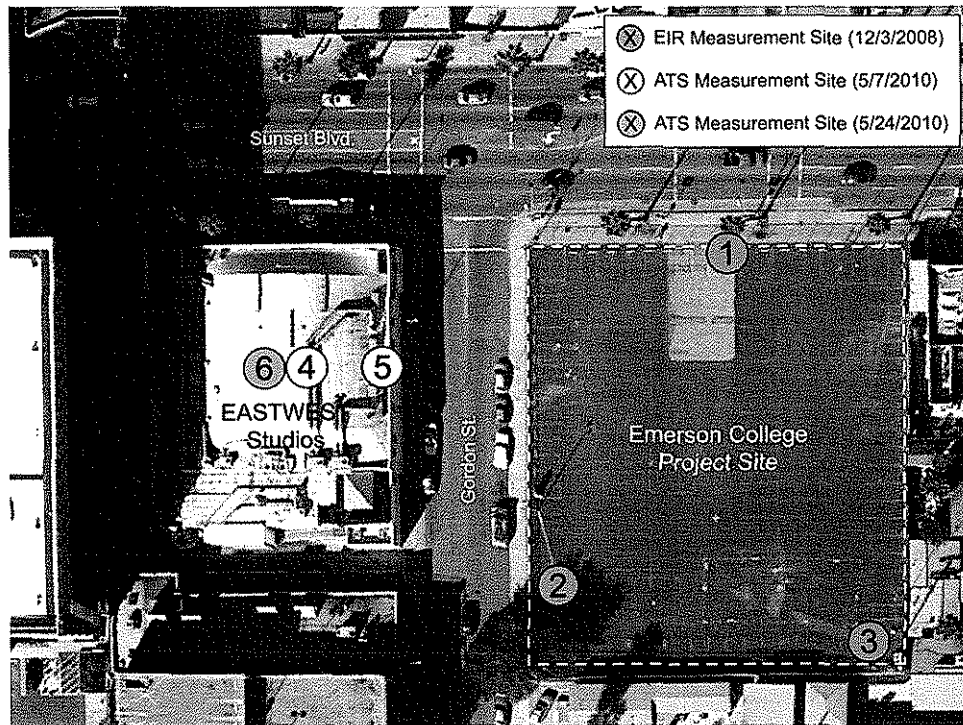


Figure 1: Ambient Noise Measurement Sites

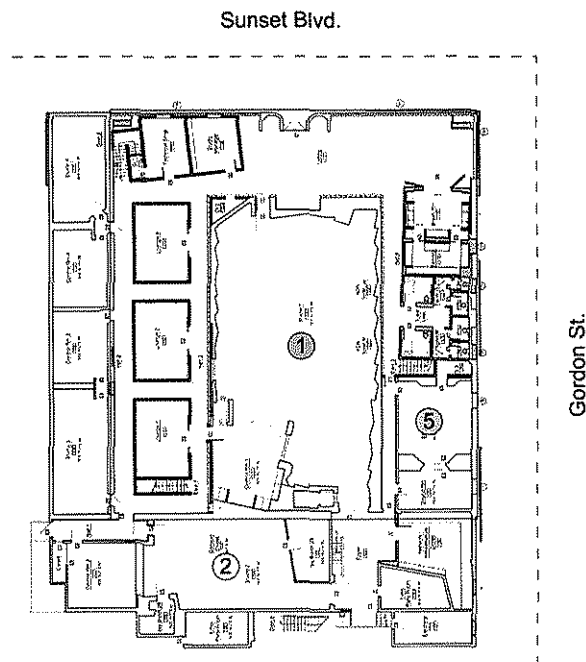


Figure 2: Studio Measurement Sites



MEASUREMENT RESULTS

On May 7, 2010 ambient noise and vibration measurements were performed at EastWest Studios in three of the studios inside the building. Simultaneous measurements were performed at two locations on the roof of the building. The microphone used for the studio noise measurements did not have a low enough noise floor to accurately measure the noise levels inside the studios, so the in-studio measurements were not considered to be valid and a set of supplemental noise measurements was performed on May 24, 2010 at the same locations inside the three studios, and at one of the same ambient noise measurement locations on the building rooftop. The time histories for each measurement are available in Appendix A.

Vibration:

The vibration measurement results are summarized in Table 1. The EIR assumed an ambient vibration level of 63 VdB for buildings facing Sunset Boulevard with occasional peaks of 72 VdB when trucks pass over bumps inside the road. The average ambient vibration levels inside the studio are lower than those assumed in the EIR, but the maximum vibration levels agree well with the assumed levels in the EIR.

Location	Measurement Duration (minutes)	Vibration Velocity Level (VdB)		
		Leq ¹	L1 ²	Maximum ³
Studio 1	35	53	62	73
Studio 2	20	53	63	70
Studio 5	22	54	64	72

Notes:
 1. The Leq is the vibration energy average over the entire measurement.
 2. The L1 is the vibration level that was exceeded 1% of the time.
 3. The maximum vibration level that was observed during the measurement.

Noise:

The ambient (outdoor) noise measurements performed on both May 7, 2010 and May 24, 2010 agree well with the measurements that were performed for the EIR. The results of the EIR measurements and the measurements performed by ATS on May 7, 2010 and May 24, 2010 are summarized Table 2 below. The ATS measurements were taken at an intermediate distance between the sites used for the EIR, and the noise levels at each site show a gradual decrease based on the distance from the primary noise source, which was traffic on Sunset Blvd.



Table 2. Measured Ambient Noise Levels

Number	Date	Location	Measurement Duration (minutes)	Distance from Sunset (ft) ¹	Sound Level (dBA)	
					Leq ²	Lmax
1	12/3/2008	Along Sunset Blvd.	15	25	70	84
2	12/3/2008	Southwest Corner of Project Site	15	200	60	72
3	12/3/2008	Southeast Corner of Project Site	15	215	62	81
4	5/7/2010	Rooftop - Studio 1	110	70	65	87
5	5/7/2010	Rooftop – East Edge	110	70	64	91
6	5/24/2010	Rooftop – Studio 1	80	70	63 ³	79 ³

Notes:
1. The approximate distance from the measurement site to the edge of the nearest lane on Sunset Blvd.
2. The Leq is the energy average of the noise level over the entire measurement.
3. The portions of the measurement where the technician was making noise on the rooftop were excluded from the calculated sound levels.

Studio 1 Supplemental Measurement:

The supplemental noise measurement in Studio 1 began at 8:48 a.m. on May 24, 2010 and continued until 9:26 a.m. The rooftop microphone was started at 9:05 a.m. and notes on specific events were taken from this point forward until the end of the measurement. At 9:14 a janitor entered the studio and was active until 9:17, so this period of the measurement was not considered in our analysis. From 9:22 until the end of the measurement the technician made some artificial noise on the roof to see how much would penetrate the studio. Since this included some stomping and banging on the actual roof and other building fixtures, it is not a valid test of the transmission of airborne noise and was not considered in our analysis.

The most significant event that occurred during the measurement was when a dumpster was emptied on the far side of the project site at 9:09:30 a.m. The location of this event is shown in Figure 3. This led to the maximum sound level that was recorded outside (79 dBA). A comparison of the A-weighted sound levels on the rooftop and inside Studio 1 shows what appears to be a relatively small response, an A-weighted sound level of 24 dBA inside the studio compared to a baseline of about 20 dBA. This comparison is shown in Figure 4 below.



Figure 3: Overhead View of Dumpster and Rooftop Measurement Site

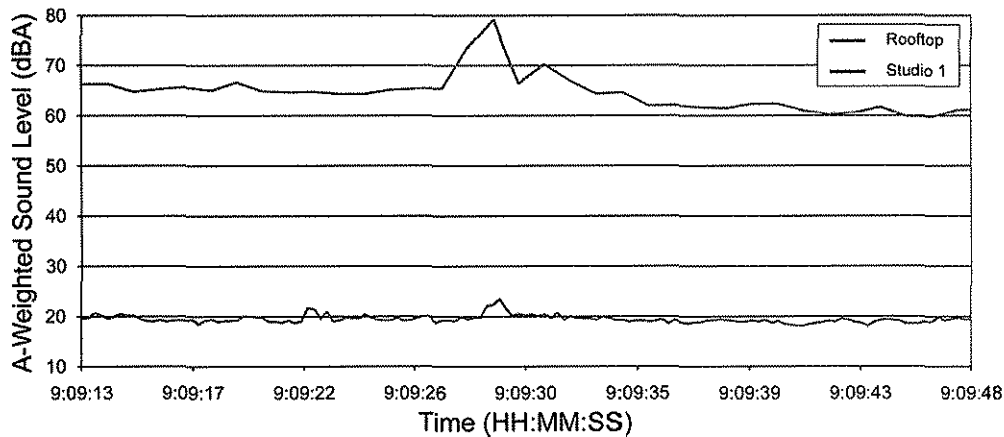


Figure 4: Comparison of Rooftop and Studio 1 Sound Levels (A-Weighted)

The A-weighted spectrum is designed to emphasize noise from 1000 to 5000 Hz, since these are the frequencies to which the human ear is most sensitive. Noise at other frequencies is adjusted downwards to account for the fact that noise at lower frequencies is less *annoying* – not less audible. A spectrogram of the dumpster event shows that most of the noise that penetrates the studio occurs at frequencies below 1000 Hz. This is shown below in Figure 5. The most prominent one-third octave band is 315 Hz.

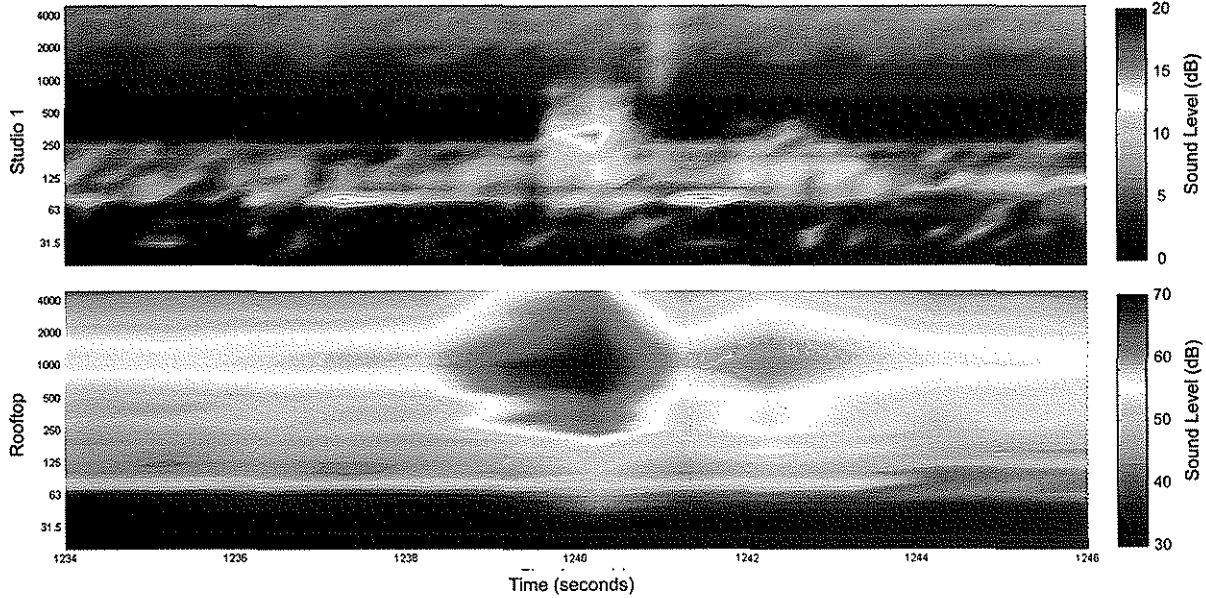


Figure 5: A-Weighted Spectrogram of Dumpster Event

As shown below in Figure 6, the noise level increase within the 315 Hz one-third octave band is actually much greater – about 10 decibels. It is very important to note that the dumpster was at a distance of over 250 feet from the studio when it was emptied. If similar events were to occur during construction (for example, loads of dirt being emptied into dump trucks during excavation) the noise would occur at distances of as close as 50 feet. While it is difficult to estimate the attenuation effect of the studio roof and walls, the source noise would be 12 decibels louder (a point source noise level increase by 6 decibels per halving of distance) for a maximum noise level of 91 dBA – and it is very likely that noises of this nature would be audible inside the studio and disruptive to recordings.

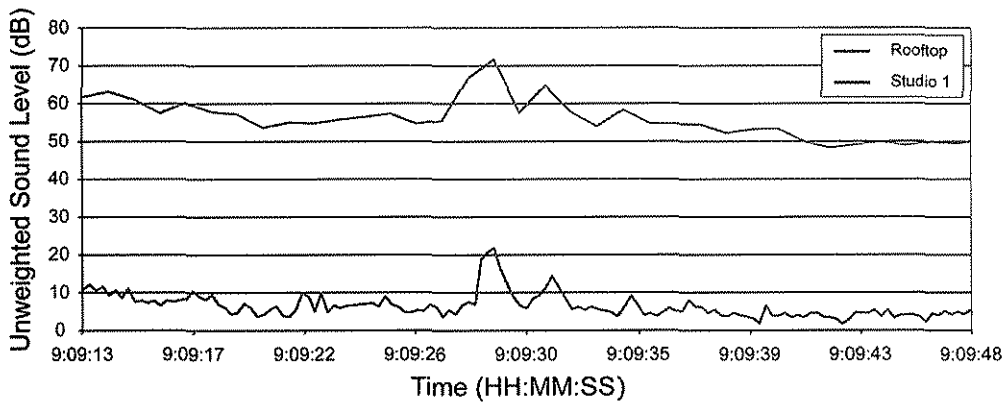


Figure 6: Comparison of Rooftop and Studio 1 Sound Levels (315 Hz One-Third Octave Band)



Another important event that occurred during the measurement was when a garbage truck passed by the studio while driving north on Gordon. The truck idled briefly at the corner of Gordon and Sunset before turning right (it was the same truck that eventually emptied the dumpster a few minutes later). The maximum A-weighted sound level during this event was not much higher than other ambient noise sources (65 dBA). A comparison of the A-weighted sound levels on the rooftop and inside Studio 1 once again shows what appears to be a relatively small response, an A-weighted sound level of 24 dBA inside the studio compared to a baseline of about 20 dBA. This comparison is shown in Figure 7 below.

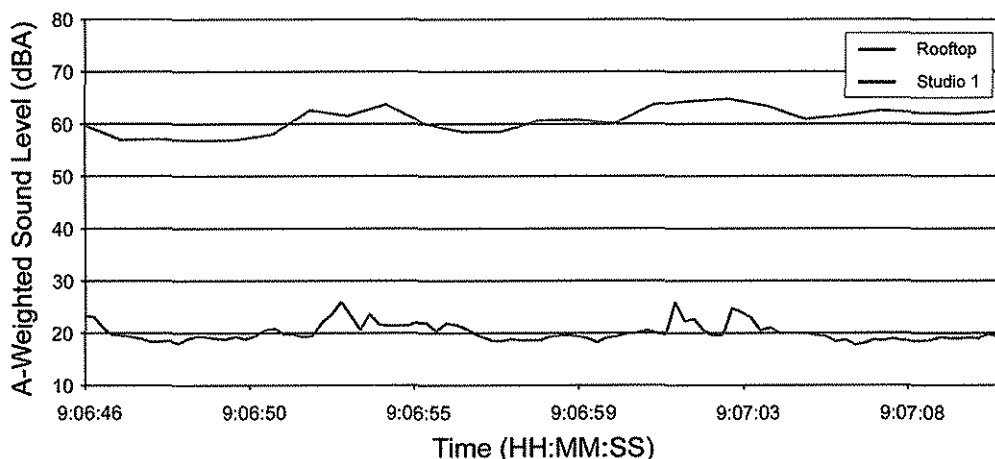


Figure 7: Comparison of Rooftop and Studio 1 Sound Levels (A-Weighted)

A spectrogram of the garbage truck passby (Figure 8) shows that most of the noise that comes from the truck occurs at 63 and 80 Hz. This noise easily penetrates the studio from this direction. Construction equipment (bulldozers, backhoes, compressors, etc.) use similar engines and will produce similar noise. An examination of the 80 Hz one-third octave band (Figure 9) shows that noise levels at this frequency increase by about 20 decibels. Heavy trucks do not normally use Gordon, so this type of event occurs rarely and does not currently cause problems at the recording studio. However, this is the kind of event that would occur on a regular basis during construction – the engine of any heavy vehicle operating at the construction site would produce a similar spectrum. In particular, if Gordon were used as a haul route, EastWest Studios would be subject to a hundred or more such events in a single day of excavation.

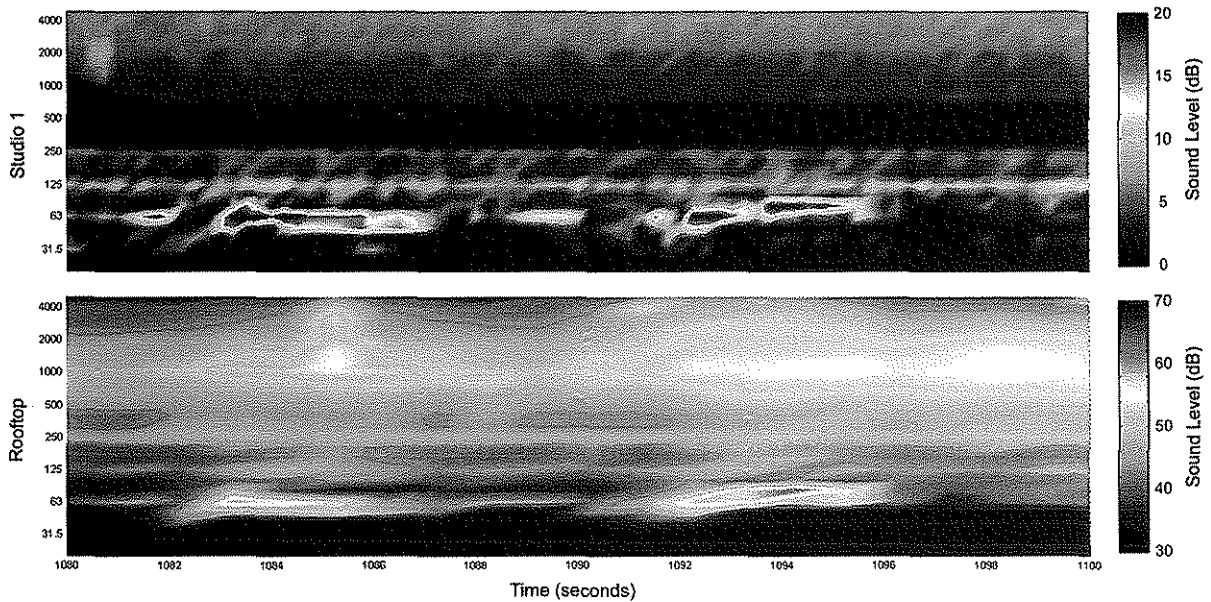


Figure 8: A-Weighted Spectrogram of Garbage Truck on Gordon

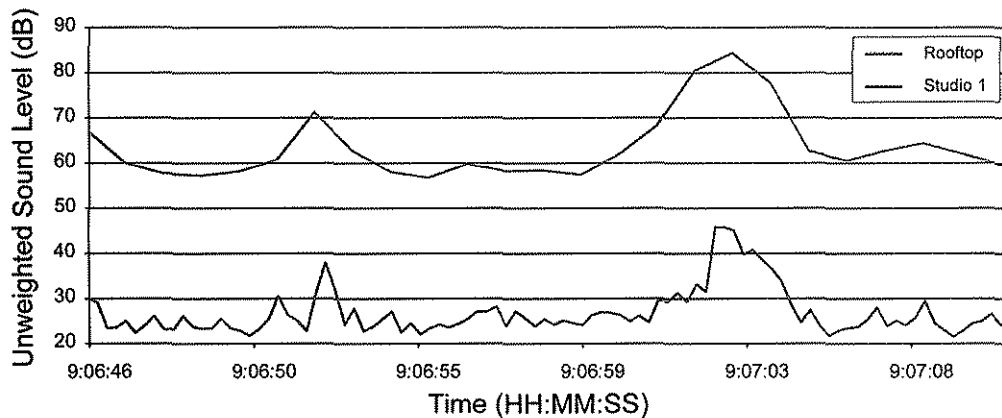


Figure 9: Comparison of Rooftop and Studio 1 Sound Levels (80 Hz One-Third Octave Band)

It is very common for heavy trucks and other large vehicles (buses, etc.) to pass by the studio on Sunset Boulevard. Noise from vehicles on Sunset does not penetrate the studio, however, because the studio walls on the north side of the building were designed to accommodate for this. The spectrograms below show a pair of dump trucks that passed in each direction (eastbound and westbound) on Sunset Boulevard. Although they produced a similar amount of low-frequency noise as the garbage truck that passed on Gordon (particularly within the 63 Hz and 80 Hz one-third octave bands), the low-frequency noise barely registers inside Studio 1.

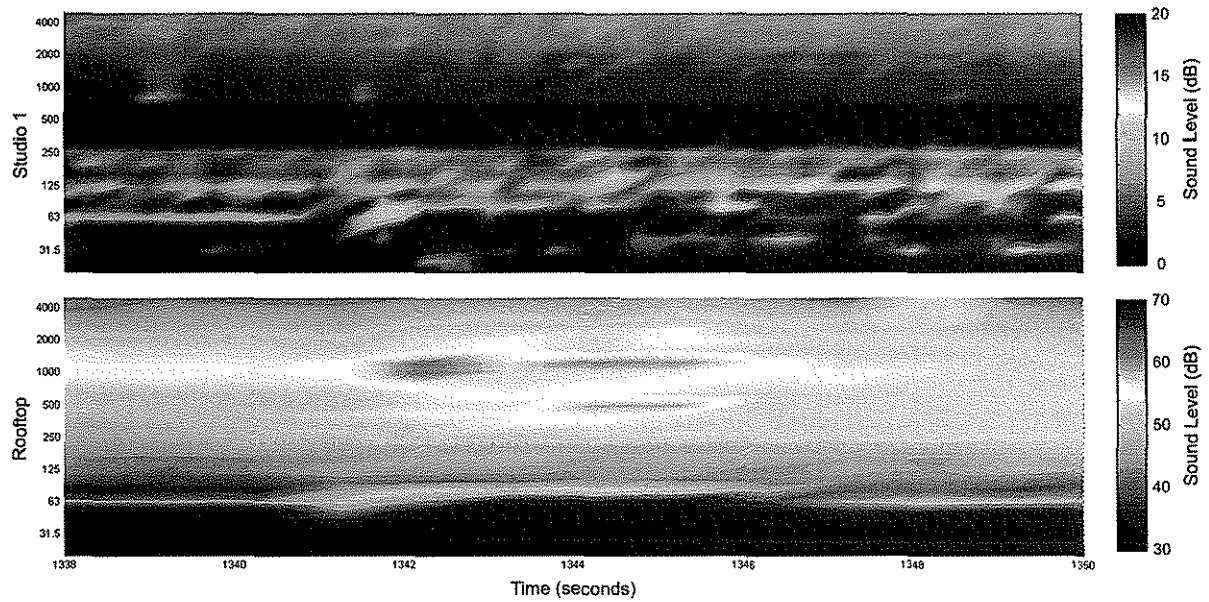


Figure 10: A-Weighted Spectrogram of Dump Truck on Sunset (Westbound)

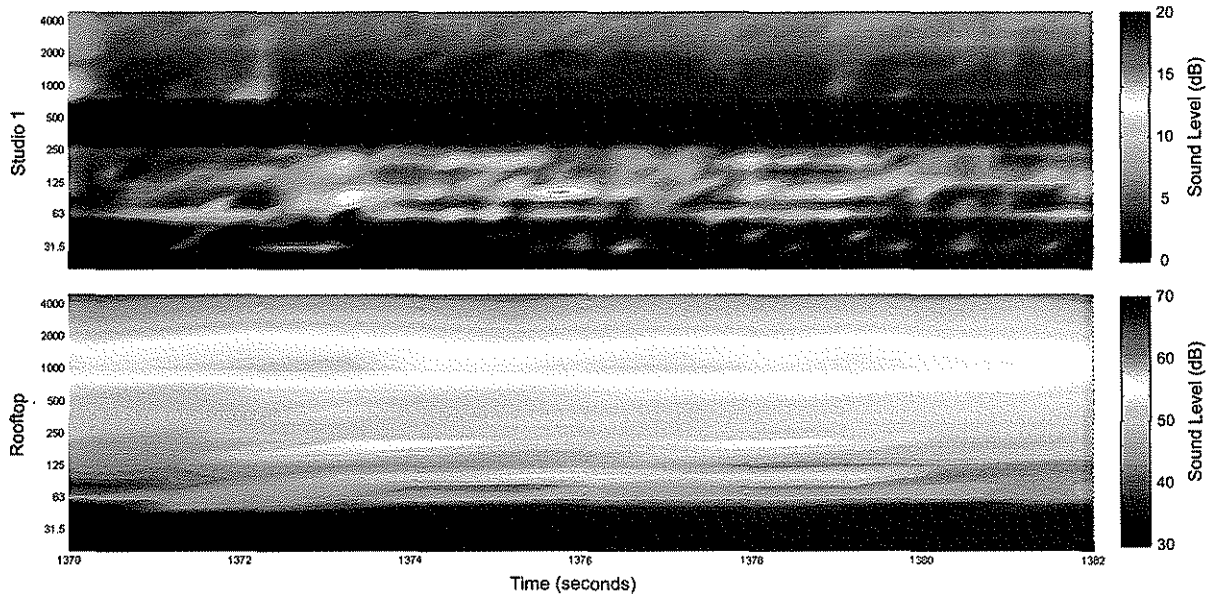


Figure 11: A-Weighted Spectrogram of Dump Truck on Sunset (Eastbound)

Studio 2 Supplemental Measurement:

Studio 2 behaved in a similar fashion to Studio 1, in that noise from trucks and buses on Sunset Boulevard did not penetrate the studio. However, no heavy vehicles used Gordon during the



measurement, so it was not possible to determine whether noise from the east side of the building penetrated the studio.

Studio 5 Supplemental Measurement:

Studio 5 was currently in use as an office, and although the office was cleared of personnel during the measurement, noise from other sources such as computer fans, air conditioning, etc. made it difficult to identify noises from Gordon and Sunset. No conclusions were drawn from this measurement.

CONCLUSIONS AND SUMMARY OF RECOMMENDATIONS

The transmission loss analysis demonstrates that external noise is detectable within the studio and does affect recording conditions. In addition, the analysis shows that using the A-weighted scheme is insufficient to determine the effect of external events on noise levels within the studio. As discussed in our earlier report, the A-weighting scale is ideal for determining human annoyance, but is not suitable for specialized building uses such as recording studios where low-frequency sounds (which are deemphasized by the A-weighting scale) are an important consideration.

Another aspect of the construction noise that was not considered by the EIR is the distribution of noise events. The maximum calculated construction noise level at EastWest Studio is 84 dBA [Emerson College Los Angeles Center Project DEIR, p. IV.F-15]. We interpret this to refer to the hourly Leq, which is the energy average over an entire hour. This does not provide any information regarding the distribution of impulsive noise – the average noise level could be generated by a single steady source that does not change by more than a few decibels, or it can be caused by several very loud (and very brief) events that occur over an entire hour. The graph in Figure 12 shows three theoretical time histories that all generate an hourly noise level of 84 dBA.

- Scheme A is a steady noise source, such as a compressor running at a constant level of about 84 dBA. This kind of activity would be least disruptive for recording activities in EastWest Studios.
- Scheme B includes a slightly lower base noise level (about 80 dBA) but also includes intermittent one-second peaks of about 100 dBA occurring once per minute. This could be caused, for example, by loads of dirt being dropped into a dump truck. This would be very disruptive to recording activities EastWest Studios.
- Scheme C includes an even lower base noise level (less than 75 dBA) but includes six one-second peaks of about 110 dBA. Peaks of this nature could be caused by events such as a heavy rock being dropped into a dump truck, or a heavy item being dropped. This would be *extremely* disruptive to recording activities at EastWest Studios.

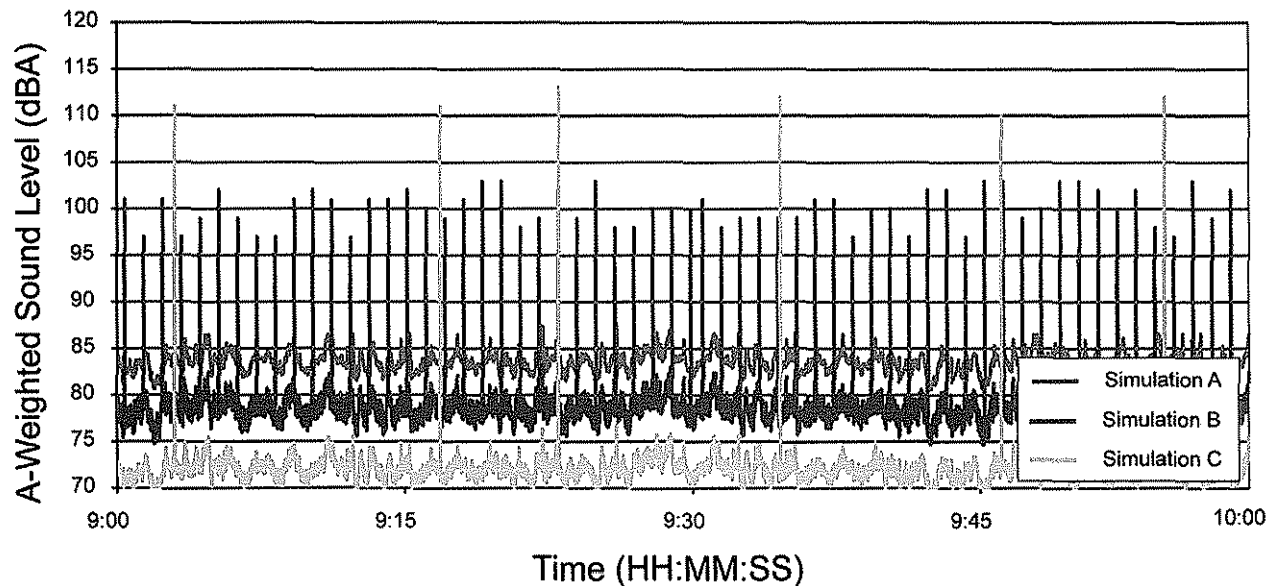


Figure 12: Simulated Construction Noise Time Histories

As discussed in our earlier report, the FEIR concludes that both construction noise and construction vibration "...cannot be reduced to below significance thresholds" at the East West Studio. The extremely sensitive nature of the studios and the fact that the proposed mitigation measures will be insufficiently to fully alleviate any potential impacts are such that alternative mitigation measures must be considered. A construction plan that limits heavy construction work to specific hours is required to minimize the disruption of EastWest Studios' business and operations.



APPENDIX A: TIME HISTORIES

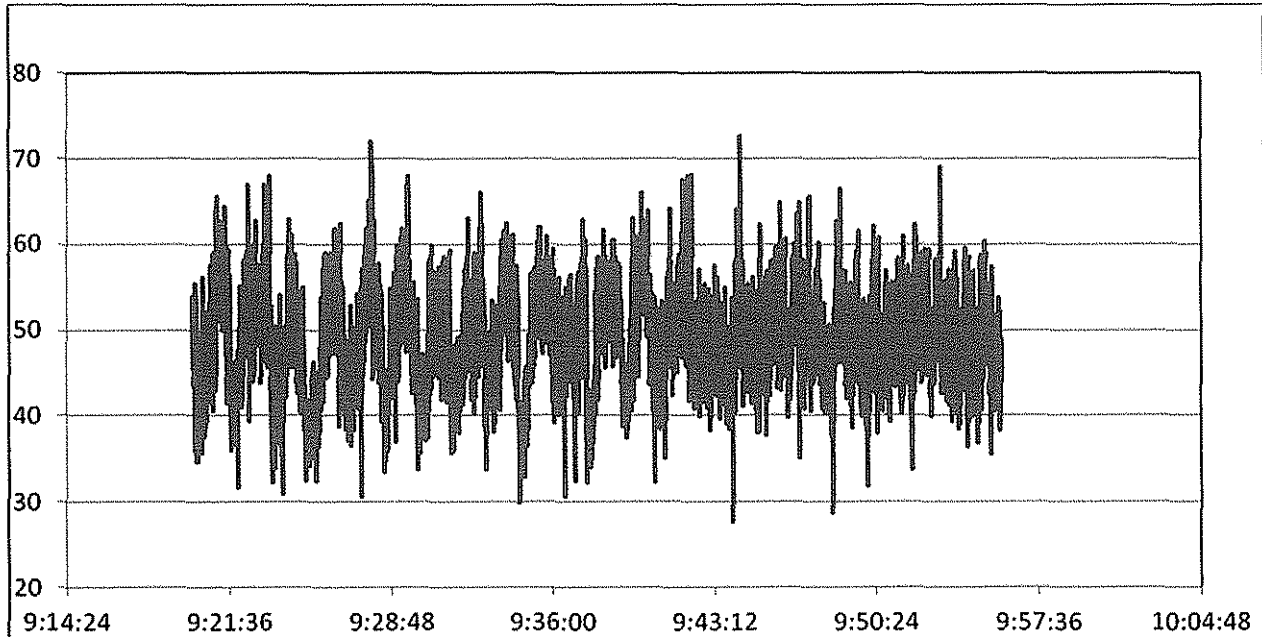


Figure 13: Time History of Studio 1 Vibration Level

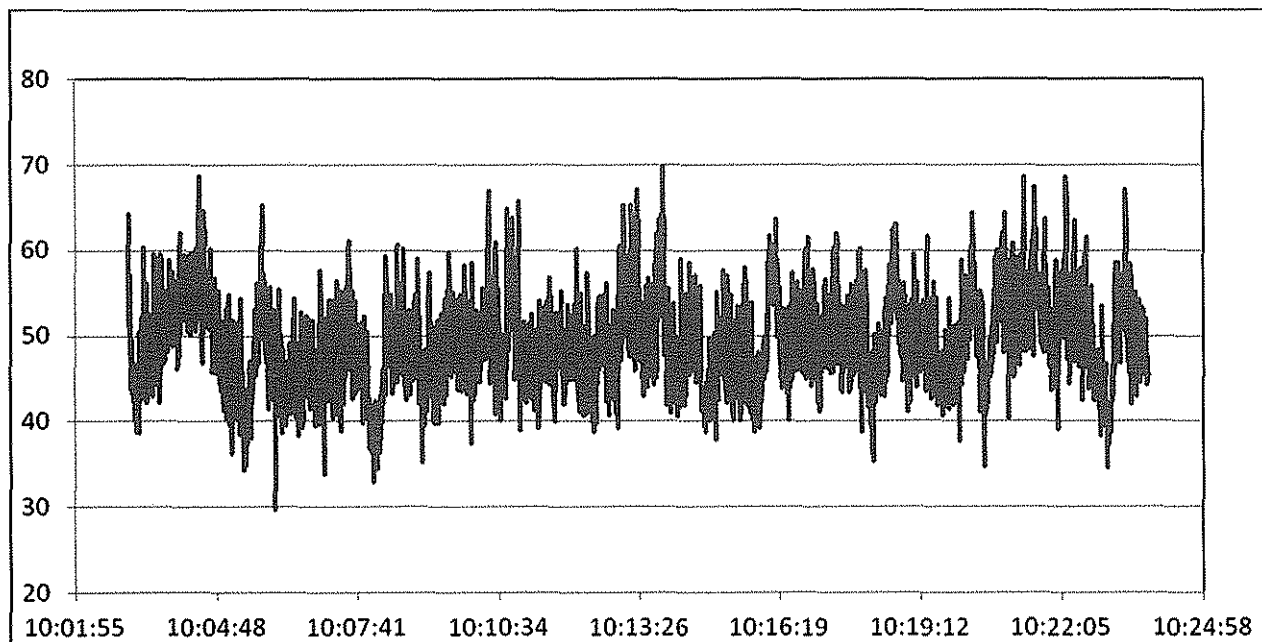


Figure 14: Time History of Studio 2 Vibration Level

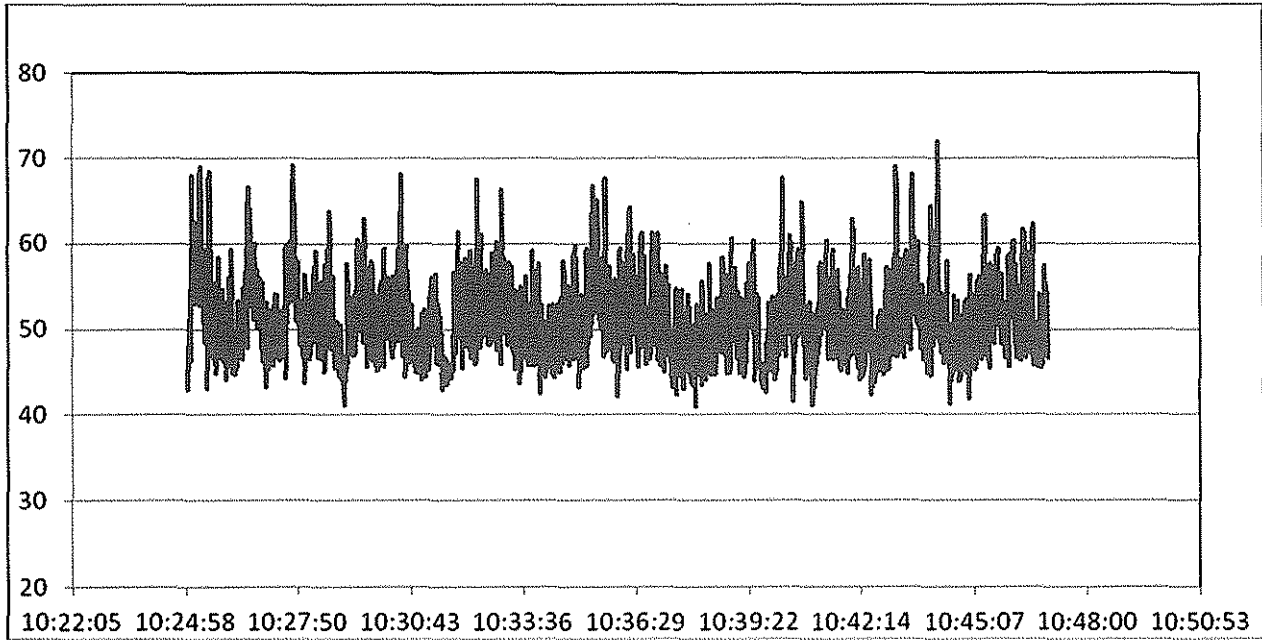


Figure 15: Time History of Studio 5 Vibration Level

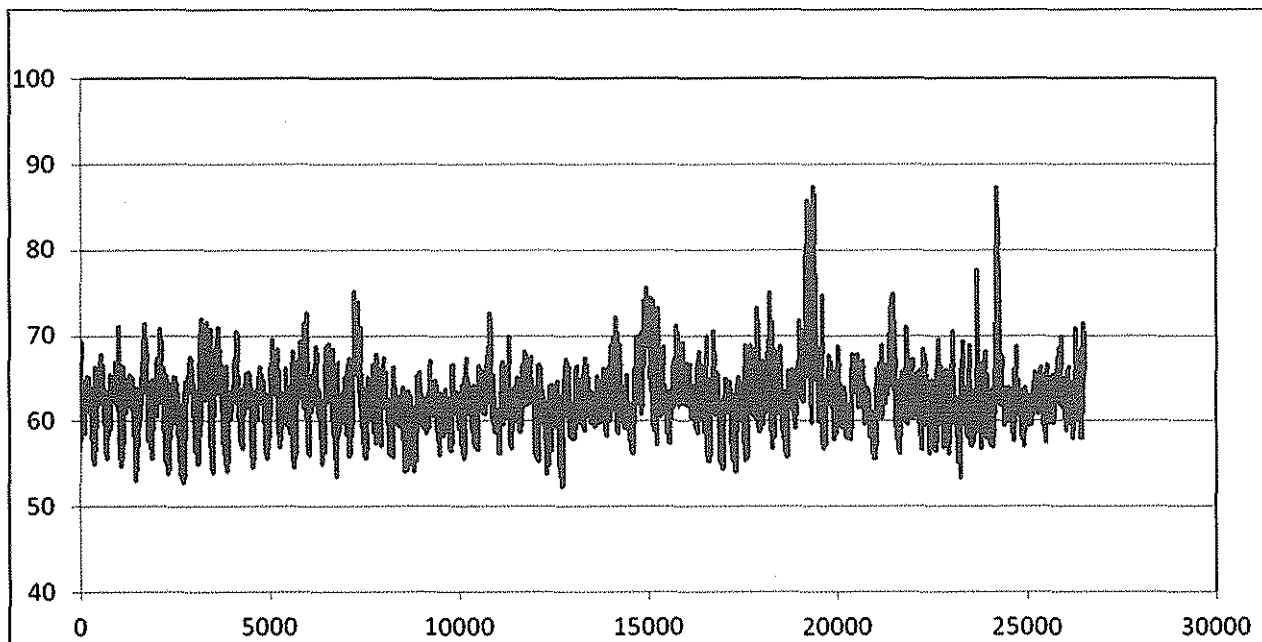


Figure 16: Time History of Rooftop Noise Level (Center)

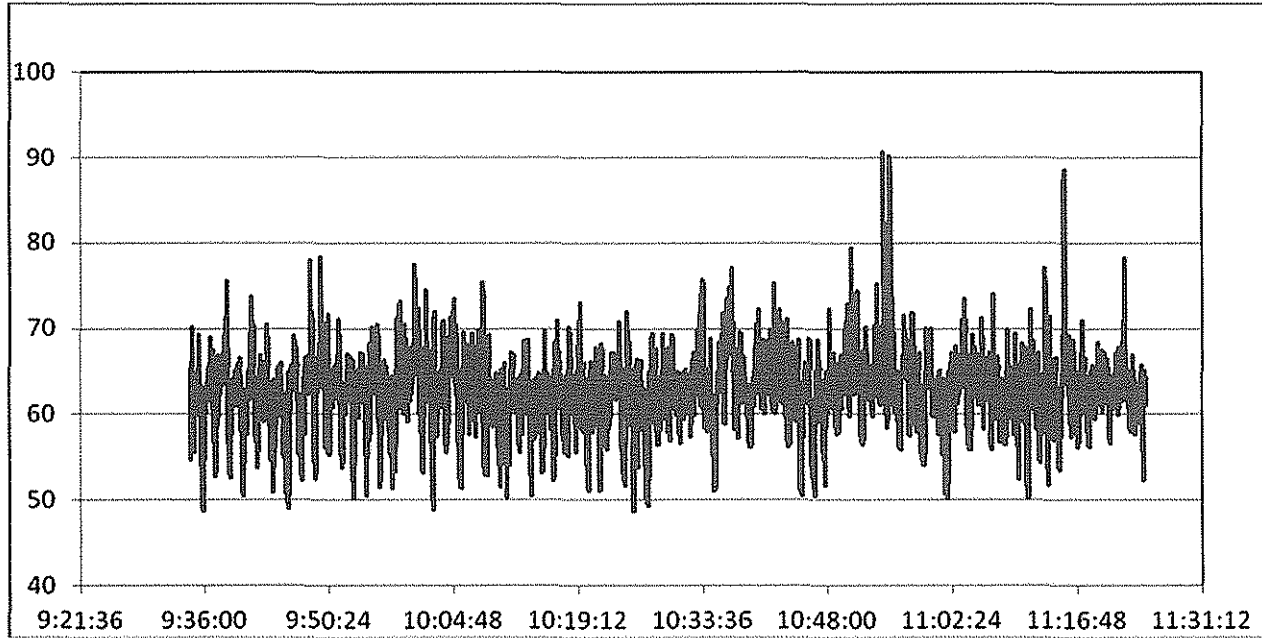


Figure 17: Time History of Rooftop Noise Level (East Roof)



APPENDIX B: PHOTOGRAPHS



Figure 18: Rooftop Noise Measurement Site (Center)



Figure 19: Studio 1 Measurement Site



Figure 20: Studio 5 Measurement Site



APPENDIX C: BACKGROUND OF NOISE

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Noise is generally defined as unwanted or excessive sound. Sound can vary in intensity by over one million times within the range of human hearing. Therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity and compress the scale to a more manageable range.

Sound is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale has been developed. A-weighted decibels are abbreviated as “dBA.” On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA. As a point of reference, Figure 21 includes examples of A-weighted sound levels from common indoor and outdoor sounds.

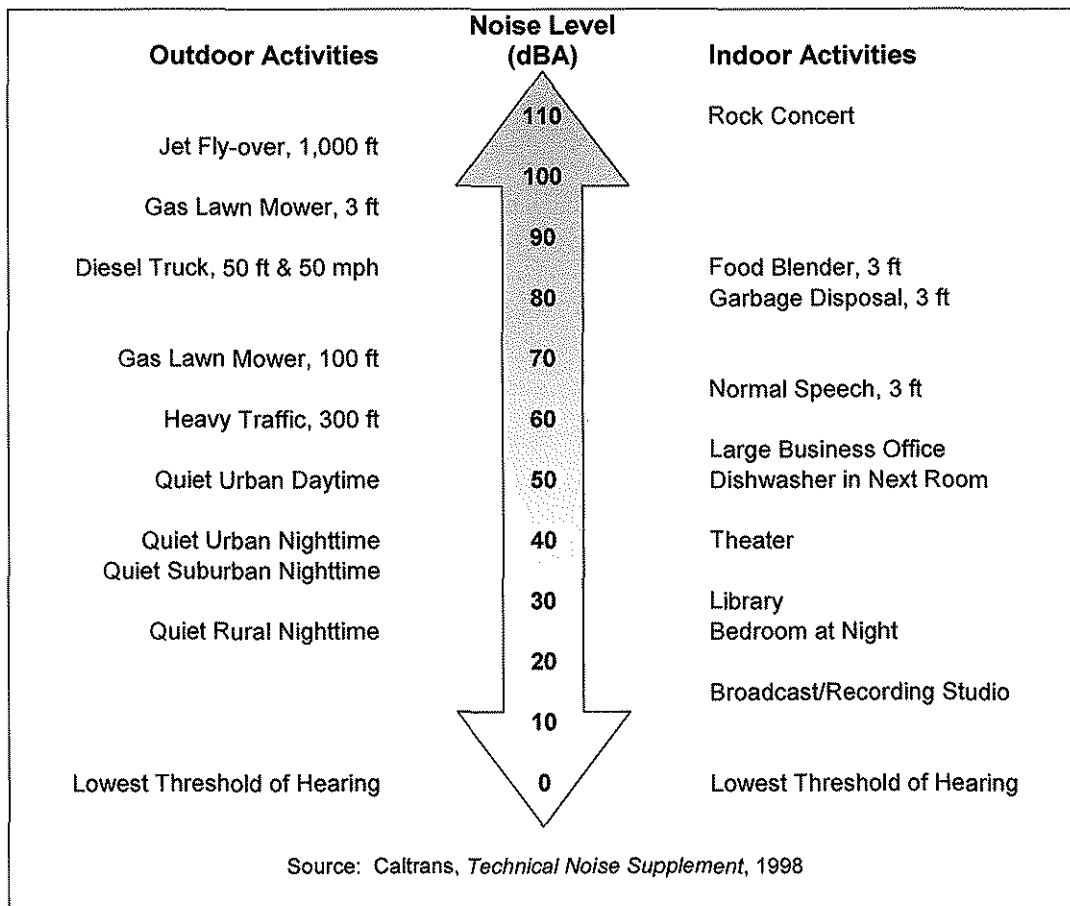


Figure 21. Typical Outdoor and Indoor Noise Sources

Using the decibel scale, sound levels from two or more sources cannot be directly added together to determine the overall sound level. Rather, the combination of two sounds at the same level yields an



increase of 3 dBA. The smallest recognizable change in sound level is approximately 1 dBA. A 3-dBA increase is generally considered perceptible, whereas a 5-dBA increase is readily perceptible. A 10-dBA increase is judged by most people as an approximate doubling of the perceived loudness.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source and the receiver and having intervening obstacles, such as walls, buildings or terrain features, that block the direct path between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include the proximity of the sound source to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

Brief definitions of the measures of environmental noise used in this report are:

- **Equivalent Sound Level (Leq):** Environmental sound fluctuates constantly. The equivalent sound level (Leq), sometimes referred to as the energy-average sound level, is the most common means of characterizing community noise. Leq represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. The noise monitors currently measure sound in 15 second intervals and these are used to calculate the 1-hour Leqs.
- **Day-Night Sound Level (Ldn):** Ldn is basically a 24-hour Leq with an adjustment to reflect the greater sensitivity of most people to nighttime noise. The adjustment is a 10-dB penalty for all sound that occurs between 10 p.m. and 7 a.m. The effect of the penalty is that, when calculating Ldn, any event that occurs during the nighttime is equivalent to 10 of the same event during the daytime. Ldn is the most common measure of total community noise over a 24-hour period.
- **Maximum Sound Level (Lmax):** The maximum sound level over a period of time or for a specific event can also be a useful parameter for characterizing specific noise sources. Standard sound level meters have two settings, FAST and SLOW, which represent different time constants. Lmax using the FAST setting will typically be 1 to 3 dB greater than Lmax using the SLOW setting.
- **Sound Exposure Level (SEL):** SEL is a measure of the total sound energy of an event. In essence, all sound from the event is compressed into a one-second period. This means that SEL increases as the event duration increases and as the event sound level increases. SEL is useful for estimating the Ldn that would be caused by individual events such as train passbys. Although the SEL values for the fifteen-second intervals are recorded (and reported along with the Leq values on the website), we are not using SEL's in any of our calculations.

Hugh Saurenman, Ph.D., P.E.

NOISE AND VIBRATION CONTROL | ATS CONSULTING

Education

Ph.D., Mech. Engr., Tufts Univ., Medford, MA
M.S., Mech. Engr., Tufts Univ., Medford, MA
B.S., Engineering, Harvey Mudd College,
Claremont, CA

Registration

Registered Professional Engineer (Mechanical):
California #18313
Years in Practice
35

Memberships

Transportation Research Board (Chair of Guided
Transit Noise and Vibration Subcommittee)
American Society of Mechanical Engineers
Acoustical Society of America
Institute of Noise Control Engineering

Experience Summary

Dr. Saurenman is a nationally known expert in issues related to transportation noise and vibration control. He has played an integral role in the development of transportation infrastructure and improvement of transit systems throughout the country and around the world. Through rail projects, research programs, and participation in national and international forums, Hugh has developed a thorough understanding of rail noise and vibration issues. Particularly relevant to the North Link project is his experience with the prediction and control of groundborne vibration. He has been responsible for creating many of the procedures used to predict noise and vibration and has authored or been a key contributor to industry-standard reference documents.

Current projects include assisting Sound Transit address noise and vibration issues on the Central Link LRT, directing noise and vibration studies for several light rail projects in California, and performing vibration studies for the Minneapolis/St. Paul Central Corridor LRT. Similar to the North Link project, a major issue for the Central Corridor LRT is the potential impact on University of Minnesota research facilities. Other recent projects include directing noise and vibration studies for rail projects in Los Angeles, San Francisco, Sacramento, Vancouver (BC), Phoenix, Tucson, San Jose, San Diego, and Portland. For all projects, Dr. Saurenman prepares comprehensive and defensible analyses and finds cost-effective and practical solutions to minimize adverse effects on adjacent communities.

Selected Project Experience

VIBRATION ANALYSIS FOR CANADA LINE RAPID TRANSIT PROJECT, VANCOUVER, CANADA (2005-2006)

The segment of the Canada Line that connects Vancouver International Airport and downtown Vancouver passes under or near to a number of both single family and multi-family residences. Extensive vibration testing was performed under Hugh's direction to determine whether and what type of vibration mitigation would be required to avoid vibration impacts. Through the vibration testing and application of data previously collected at existing systems, ATS was able to demonstrate that use of highly-resilient direct fixation fasteners would be sufficient to eliminate the impacts to residences. This is that approach that was used by SNC-Lavalin for approximately 6.5km of track that is as close as 15m to residences. No problems with ground-borne vibration have been reported in the first seven months of revenue service suggesting that more expensive mitigation measures such as floating slabs would not have provided any benefits.

CENTRAL CORRIDOR LIGHT RAIL PROJECT, MINNEAPOLIS/ST. PAUL (2008-2010)

Hugh has directed numerous vibration studies for this project to assess potential impacts and recommend mitigation measures. Vibration impacts to sensitive receptors became a major issue during the FEIS phase of the project. Concerned stakeholders included Minnesota Public Radio (MPR), Twin Cities Public Television (tpt), the University of Minnesota, the State Historic Preservation Office, two historic churches, and others. Hugh's participation included a number of meetings with stakeholders to discuss potential vibration impacts and mitigation measures that might be used to minimize the impacts. The vibration studies included approximately 30 vibration propagation studies, a demonstration of the accuracy of the vibration

propagation prediction procedure, an assessment of how wheel condition affects vibration levels, and several force density tests. The technical memorandums have withstood intense scrutiny by several other vibration consultants.

EXPOSITION CORRIDOR LIGHT RAIL PROJECT, LOS ANGELES (2006-2010)

Hugh has directed noise and vibration studies for the Draft EIS/EIR and Final EIR for Phase 2 of this project and has directed on-call tasks for Phase 1 that is currently under construction. The proposed alignment passes close to a number of residences and there is considerable concern about potential noise and vibration impacts. Because of impending legal actions from several groups within the affected communities, the studies were more comprehensive and more thoroughly documented than normal. Other sensitive receptors include several recording and broadcast studios used by the movie and television industries.

TCRP STUDY D-12: GROUND BORNE NOISE AND VIBRATION IN BUILDINGS CAUSED BY RAIL TRANSIT (2006-2009)

Hugh was one of the three principal researchers on this project. The goal was to develop a human exposure-response curve for groundborne vibration generated by rail transit trains that would provide scientific support for criteria for human exposure to groundborne vibration. The study consisted of telephone interviews of 1300 people living near five rail transit lines, detailed measurements to characterize the vibration environment of the respondents, evaluating a number of different vibration measures at predicting human response, and developing a final exposure-response curve.

Education

G.D.E., Metallurgy, University of the Witwatersrand, South Africa, 2004.

B.S., Chemistry, Harvey Mudd College, 1999.

Years in Practice

5

Memberships

Engineer-in-Training (EIT), California

Institute of Noise Control Engineering (INCE).

American Society of Civil Engineers (ASCE).

Experience Summary

Since joining ATS in 2005, Mr. Dennis has played key roles in a variety of projects related to transportation noise and vibration control. His responsibilities have included performing field measurements for a number of rail and highway projects, taking the lead for the literature review for TCRP Project D-12 (a research project on criteria for ground vibration), developing MatLab routines for data analysis, evaluating noise and vibration problems after the VTA Vasona Line opened, testing the effectiveness of rail dampers as a noise mitigation measure for Sacramento Regional Transit, and traffic noise analysis for a number of projects using the FHWA computer program TNM version 2.5. Mr. Dennis has broad experience in many areas of engineering, including biomedical, manufacturing, and industrial engineering. He has worked as a consultant on projects in the U.S., Ireland, and South Africa to improve production efficiency and reduce costs. His experience in failure analysis and fracture mechanics gives Mr. Dennis a strong foundation of knowledge in fatigue and the long-term effects of vibration on transit systems.

Selected Project Experience

CENTRAL LINK LIGHT RAIL CORRIDOR, SEATTLE, WASHINGTON (2009-PRESENT)

The recently opened Central Link LRT corridor links downtown Seattle with the Seattle-Tacoma International Airport. Since opening in 2009, the project has been plagued by numerous noise issues, and ATS Consulting was hired as an on-call consultant to identify excessive noise sources and develop mitigation solutions for these problems. Zack's most recent tasks for this project have included performing data analysis of onboard and wayside noise measurements, and developing a vehicle positioning system to help identify and isolate corrugated rail sections and optimize rail grinding operations.

NOISE ANALYSIS FOR WEST LOS ANGELES COLLEGE, TURNER CONSTRUCTION (2005-PRESENT)

West Los Angeles College has undertaken a series of projects to improve the college facilities and modernize the campus. Zack has prepared various noise studies for construction and other activities including the construction of a recycling center, excavation and construction of a parking structure, operation of a temporary construction haul road, construction of a new permanent road, and construction of a football grandstand. Zack's responsibilities for this project have included field noise measurements, long-term noise monitoring, automation of data-collection and reporting processes, traffic noise modeling, preparation of technical memorandums, and on-call consulting for the environmental impact report preparation and review.

CENTRAL CORRIDOR LIGHT RAIL PROJECT, MINNEAPOLIS/ST. PAUL (2008-2010)

The proposed 11-mile Central Corridor LRT project links downtown St. Paul and downtown Minneapolis via Washington and University avenues. The project alignment includes several vibration sensitive spaces including a number of University of Minnesota (U of M) labs; Twin Cities Public Television broadcast studios, and Minnesota Public Radio (MPR) recording studios. Zack was responsible for data collection data collection, analysis, and preparation of technical memorandums for three series of field measurements, including

impact testing at various locations on the college campus and in downtown St. Paul, ambient vibration measurements at sensitive laboratory spaces at the U of M, and measurements of the force density of CCLRT vehicles on both embedded and ballast-and-tie track sections. Of particular note is his work in analyzing the source of unusual vibration levels from a test along the Hiawatha Corridor, the existing light rail line in Minneapolis. Through a careful analysis of the vibration measurement results, he was able to identify culverts under the tracks as the source of anomalous vibration levels.

SOUTHERN CALIFORNIA INTERNATIONAL GATEWAY PROJECT, LONG BEACH CA (2008)

The Burlington Northern Santa Fe railroad company has plans to build an international shipping container facility in Long Beach, California. Zack was responsible for designing and performing a noise study regarding the effects of this facility on the surrounding community. The study included field measurements, data analysis, traffic noise modeling, and preparation of a final report with appropriate noise mitigation recommendations.

ON-CALL CONSULTING FOR LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY (2007-2008)

ATS Consulting performed on-call consulting for several LACMTA projects including a study of a car wash and a cleaning station for mass transit vehicles, noise and vibration measurements of the recently completed Eastside extension light rail corridor, and a study of options for reducing noise on the platforms of the Harbor Transitway. For these projects Zack was responsible for coordinating field measurements, noise modeling of indoor and outdoor spaces, developing and evaluating noise mitigation measures, and preparing technical memorandums.

Wednesday, June 30, 2010

**To: Robert Silverstein
The Silverstein Law Corporation**

From: Richard Platkin

Re: Appeal of CPC-2009-2504-GPA-ZC-HD-SPR-GB

As a professional city planning consultant (See Appendix for credentials), I have reviewed the City Planning Commission's May 27, 2010, Determination Actions for the Emerson College project at 5960 W. Sunset Boulevard in Los Angeles. The materials I reviewed also included the attached staff report from the Department of City Planning, correspondence, and the project's Final Environmental Impact Report (FEIR).

I. SUMMARY AND RECOMMENDATIONS

I find the actions of the City Planning Commission and the staff report from the Department of City Planning deficient for the reasons discussed below. I conclude that the appeal of the City Planning Commission's actions should be sustained. Emerson College should be encouraged to resubmit a project design which does not require discretionary actions, and which could, therefore, be approved by the Los Angeles Department of Building and Safety without any discretionary actions. Such a project is, in fact, described and analyzed in the Final Environmental Impact Report (FEIR), which has already defined its general parameters. Such a redesigned, by-right project would contain the instructional part of Emerson College's proposal, but not its proposed residential component for students, interns, and faculty. In this respect, the redesigned project would still be viable and also be on a par with the other eight existing film and acting schools in Hollywood, seven of which have no residential component, and none of which have intern or faculty housing.

I should also add that the question is not whether there should be an Emerson College campus facility in Hollywood, but what type of facility should be built. The choice is ultimately between a by-right alternative, both viable, analyzed in the FEIR, and in compliance with existing zoning laws and planning policies, or an alternative which could only be built by deviating from those laws and policies. Because the second option requires discretionary actions which are not consistent with the purposes, intent, and goals of the General Plan, such a project would face insurmountable legal hurdles based on that inconsistency.

II. EMERSON COLLEGE'S FIVE REQUESTED DISCRETIONARY ACTIONS MUST BE CONSISTENT WITH THE LOS ANGELES GENERAL PLAN.

The May 27, 2010 Determination (Attachment 1) prepared by the Department of City Planning (Planning Department) and approved by the City Planning Commission for five discretionary actions for the Emerson College project at 5960 W. Sunset, Los Angeles, California 90028 (i.e., CPC-2009-2504-GPA-ZC-HD-SPR-GB) site misrepresents the City of Los Angeles General Plan and the legally required findings of consistency with the General Plan required by the Los Angeles City Charter (Charter) and/or the Los Angeles Municipal Code (LAMC).

The Commission first "Approved and Recommend that the City Council Adopt a General Plan Amendment to revise the land use designation in the Hollywood Community Plan from Limited Manufacturing to Regional Center Commercial to both the project site and to the Add Area." This action requires a consistency finding pursuant to Charter Section 556:

"When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings." (Note: Section 558 addressed General Plan Amendments.)

Among the items listed in Section 558 are General Plan amendments.

The Commission also took two zoning amendment actions. It "Approved and Recommend that the City council Adopt a Zone Change from [Q]C3-1 to (T)[Q]C4-2D to eliminate the [Q] Condition which prohibits the residential uses (Ord. No. 165,652) to establish (T) Tentative Classification and [Q] Qualified Conditions pursuant to this action" and Approved and Recommend that the City Council Adopt a Height District Change from Height District – 1 to District -2D. According to the Determination, the "D" Limitation limits allowable Floor Area Ratio to 3.1:1 in lieu of the 6:1 nominally permitted Height District 2, with no restriction as to height."

Charter Section 558 indirectly requires General Plan consistency findings through required findings of consistency with good zoning practice, which would include consistency with the General Plan of the City of Los Angeles:

"Recommendation of the City Planning Commission. After initiation, the proposed ordinance, order or resolution shall be referred to the City Planning Commission for its report and recommendation regarding the relation of the proposed ordinance, order or resolution to the General Plan and, in the case of proposed zoning regulations, whether adoption of the proposed ordinance, order or resolution will be in conformity

with public necessity, convenience, general welfare and good zoning practice...

Direct findings of consistency, however, are required under LAMC section 12.32 Q (a) (2):

Conditional Approval or Denial. Notwithstanding Subdivision 2.(a) of this subsection, a vesting zone change may be conditioned or denied if the City Planning Commission or the City Council determines: (Amended by Ord. No. 177,103, Eff. 12/18/05.)

- (i) that the condition is deemed necessary to protect the best interest of and assure a development more compatible with the surrounding property or neighborhood; to secure an appropriate development in harmony with the objectives of the General Plan; to prevent or mitigate potential adverse environmental affects of the zone change; or that public necessity, convenience or general welfare require that provisions be made for the orderly arrangement of the property concerned into lots and/or that provisions be made for adequate streets, drainage facilities, grading, sewers, utilities and other public dedications and improvements; or
- (ii) the zone change is denied because it is not in substantial conformance with the purposes, intent or provisions of the General Plan or is not in conformance with public necessity, convenience, general welfare and good zoning practice and the reason for not conforming with the plan.”

As part of it actions, the City Planning Commission also approved the Site Plan Review for the Project, an action that also requires a consistency finding pursuant to LAMC Section 16.05.

The final action taken by the City Planning Commission requiring a General Plan consistency finding was to “[Waive]the required 2-foot street dedication and 5-foot street widening on Sunset Boulevard allowing a 100-foot public right-of-way width, a 35-foot half-roadway with, and a 15 foot sidewalk width in lieu of conforming to the Major Highway Class II Street Standards.” This should actually be considered a General Plan amendment, as it alters a standard contained within the General Plan, in this case the Hollywood Community Plan’s Generalized Hollywood Circulation Map, presented in Attachment 8. As such, the General Plan consistency finding requirements of Charter sections 556 and 558 should both apply despite the Planning Department’s failure to offer any findings with respect to those sections.

III. THE LOS ANGELES GENERAL PLAN INCLUDES A FRAMEWORK ELEMENT, THE GENERAL PLAN'S PRIMARY POLICY

These required consistency findings must address the issue of consistency with the Los Angeles General Plan Framework Element. The Framework Element is the primary policy document within the General Plan. Adopted in 1995, the Framework Element is a growth neutral policy document, meaning it is neither anti-growth nor pro-growth. Instead, it is supportive of growth if/when it is warranted because of changes in underlying demographic trends and related demand for public services and infrastructure.

The Framework Element explains growth neutrality at numerous points throughout the document, such as the sections referenced below:

EXECUTIVE SUMMARY: "The Framework Element does not mandate or encourage growth." (See Attachment 2.)

"The City is not promoting... population growth. Rather, pursuant to conformity requirements, it has developed this Element to establish policies to best accommodate this growth when and if it should occur."

"LAND USE: The primary objectives of the policies in the Framework Element's Land Use chapter are to support the viability of the City's residential neighborhoods and commercial districts, and, when growth occurs, to encourage sustainable growth in a number of higher-intensity commercial and mixed-use districts, centers and boulevards and industrial districts particularly in proximity to transportation corridors and transit station."

"INFRASTRUCTURE AND PUBLIC SERVICES: Maintain an adequate system/service to support the needs of population and employment. This encompasses the upgrade and replacement of existing facilities as they deteriorate as well as the expansion of facilities/services to accommodate growth."

"IMPLEMENTATION PROGRAMS: Establish master plans for infrastructure and public services to upgrade existing deficiencies and meet the needs of future growth."

"CHAPTER TWO: GROWTH AND CAPACITY: The theoretical capacities of the existing general plan at buildout, as shown in the Framework Element technical reports and Environmental Impact Report, are adequate to accommodate growth to the year 2010. While its housing capacity is more constrained than commercial and industrial uses, the Plan's capacity for growth considerably exceeds any realistic market requirements for the future. For example, there is sufficient capacity for retail and office commercial uses for over 100 years even at optimistic,

pre-recession, market growth rates. At the same time, the impact assessments of the current general plan indicate that if all lands were to be developed with the uses at the maximum densities permitted, an unrealistic jobs/housing relationship would result and supporting infrastructure and public services would be unable to support this level of growth.” (See Attachment 3.)

CHAPTER THREE: LAND USE: “The City's commercially-zoned corridors, districts, and centers have the capacity to accommodate growth that considerably exceeds economic market demands well into the 21st Century. While densities at a 1.5:1 floor area ratio (FAR) are generally permitted, existing development averages approximately 0.58:1 and market demand forecasts indicate increase of only 10 to 15 percent. (See Attachment 4.)

In addition to presenting growth neutral policies, the General Plan Framework Element also discusses how the General Plan, and the Framework Element itself, are to be implemented. Relevant implementation mechanisms, identified in the Chapter 10 of the Framework Element - Program Implementation- include:

Zoning: Zoning for private and public parcels, as made fully consistent with the General Plan through the implementation of Assembly Bill 283 in the late 1980s and subsequent Community Plan updates, including the Hollywood Community Plan, updated in 1988 and currently going through a follow-up update process, draft documents of which have been partially posted on the Department of City Planning's web-site. In other words, the city's existing zoning is an important implementation tool for the policies and plan designations of the adopted General Plan, and its Land Use/Community Plan elements. (See Section 5, “Zoning Approvals and Zoning Consistency” in Attachment 10.)

Overlays: Zoning overlay ordinances, in particular Specific Plans and Historical Preservation Overlay Zones, as well site-specific Q and T conditions, are related implementation tools. In the language of the General Plan Framework's Chapter III: “In many respects, these plans advance the fundamental goals of the Framework Element for focusing growth, increasing mobility, reducing air pollution, and establishing a higher quality built environment for the City's residents . . . Adoption of the Framework Element does not supersede nor alter adopted specific plans. Adopted specific plans are consistent with the General Plan Framework Element.”(See Policy 18, Zoning, in Attachment 9)

CIP: The City's Capital Improvement Program (CIP) is the primary mechanism for implementing the General Plan on the public right-of-way, public area, and quasi-public areas. Despite lapses in practice, it is the legal responsibility of the City Planning Commission to review and approve the City's Capital Improvement Program for consistency with the City's General Plan. In this way, the CIP is the formal link between the City's planning process and its infrastructure budgeting process, although the policies of the General Plan also provide adopted financial priorities which should be used by the

Mayor, City Administrative Officer, and City Council to formulate, review, and approve the City's budget. (See Policy 31, CIP, in Attachment 9.)

IV. GENERAL PLAN CONSISTENCY FINDINGS MUST BE CONSISTENT WITH THE INTENT OF THE FRAMEWORK ELEMENT

Given growth neutrality as an overarching policy, major deviations in General Plan land use designations and corresponding implementing zoning require clear establishment of two claims in order to make findings of consistency with the General Plan.

First, the City must show that there are changes in local conditions from the time of the adoption of the Framework Element. With respect to the plan amendments and zone changes sought by Emerson College for its proposed Hollywood campus, the city would have to show that the growth conditions (i.e. population, jobs, housing, and traffic) that were the basis for the General Plan Framework Element have dramatically increased since the Framework's adoption in 1995, rendering the General Plan Framework Element and the Hollywood Community Plan policies and implementation provisions inadequate and obsolete. (See Attachment 5). To complete this claim, the City would have to make legal findings that as a result of these changes, the plans' goals, policies, and implementation programs, in particular land use categories and infrastructure construction, must be amended to conform to the changed demographic and related conditions, such as population growth and/or traffic congestion.

Second, the Framework Element requires mid-course monitoring of the effectiveness of the General Plan's goals objectives and policies. It is not enough to simply monitor growth trends and infrastructure construction. If this mid-course monitoring determines that application of General Plan implementation tools, specifically its land use plan designations and its corresponding zoning, have not succeeded in achieving the plan's goals, objectives, and policies, then appropriate consistency finding could be made for changes to those designations and zoning.

V. EMERSON COLLEGE HAS PRESENTED NO INFORMATION TO SUPPORT FINDINGS OF GENERAL PLAN CONSISTENCY

In the case of the Emerson College entitlements, no data or analysis has been presented to draw the above conclusions, other than to argue in the Final EIR that the "By-Right" alternative is not financially viable for the applicant. As expressed in the Determination's Statement of Overriding Considerations to certify the Final EIR, "This [by-right] alternative, however, does not take into consideration the financial feasibility of construction and development." (See Attachment 1.)

Even if data had been presented to substantiate the claim of financial non-viability, the claim is irrelevant to the question of legally required General Plan consistency findings. Financial hardships resulting from the City's legally adopted General Plan policies, plan designations, and zoning do not justify amendments to those plans or zones. Using such a

claim for justifying General Plan and zoning amendments would supplant the city's planning laws and procedures with real estate speculation. Since private owners could universally increase profitability through projects which allowed more land uses or projects which were built larger and taller, such a criterion would undercut all legally adopted planning documents and zoning ordinances.

VI. THE CITY HAS FAILED TO DEMONSTRATE THE INADEQUACY OF EXISTING GROWTH NEUTRAL PLANS NECESSARY TO MAKE FINDINGS OF GENERAL PLAN CONSISTENCY.

The Planning Department has also failed to meet these thresholds in its determination and other planning actions because of two other short-comings. First, the Planning Department has not updated the General Plan Framework Element since its adoption in 1995, even though the element's horizon year is 2010. As a result, the City has no way to know if the General Plan has become inaccurate and, therefore, in need of amending. At most, they only know from their own data that Los Angeles has not reached the estimated 4.2 million people which the General Plan Framework Element forecast for the year 2010. (See Attachment 4.)

Second, the Planning Department has failed to analyze the General Plan Framework Element's underlying growth trends since its adoption in 1995, the effectiveness of the element's goals, objectives, and policies during that same time span, or the construction and maintenance of infrastructure since 2000. Without this analysis, the City lacks a further basis to justify General Plan amendments or changes in General Plan implementation mechanisms, specifically zoning.

As an alternative means of analysis, though, it is possible to determine how the Hollywood Community Plan area's forecast growth in the General Plan Framework Element compares to the best and most current estimates by the Planning Department for actual growth in the plan area. This is possible by comparing the General Plan's population and housing projections for the each of the city's 35 community plans (see Attachment 6) with the Planning Department's current (2008) population and housing estimates for the same 35 community plan areas. (See Attachment 7.)

These data reveal that Hollywood -- in terms of population and housing units -- has hardly changed over the past 20 years, from 1990 to date, despite the proactive support of the Community Redevelopment Agency for real estate projects, as well as the many land use entitlements, grants, loans, and fee waivers approved by the City Council. The forecast growth of population and housing units has simply failed to materialize.

Statistical Changes for Hollywood Community Plan Area, 1990-2008/2010

Population

General Plan Forecast		
1990	Projected Increase 1990-2010	Projected Total 2010
213,860	43,175	256,935
Actual		
1990	Actual Increase 1990-2008	Actual Total 2008
213,912	12,200	226,112
Difference, Forecast v. Actual		
1990	1990-2008/2010	Total 2008/2010
-52	-30,975	-30,823

Housing

General Plan Forecast		
1990	Projected Increase 1990-2010	Projected Total 2010
99,943	17,610	117,553
Actual		
1990	Actual Increase 1990-2008	Actual Total 2008
99,943	2,686	102,629
Difference, Forecast v. Actual		
1990	1990-2008/2010	Total 2008/2010
-0	-14,924	- 14,924

The conclusion from these charts is inescapable. The City's own published data provides compelling information that the General Plan substantially overestimated the amount of population and housing growth anticipated in the Hollywood Community Plan area between 1990 and the Framework Element's 2010 horizon year, based on local zoning capacity and market conditions. This assumes that 2010 Census will not show a dramatic surge over the City's 2008 population and housing estimates.

If any conclusions are to be drawn from this data and applicable mid-course corrections made to the Los Angeles General Plan, as mandated by the Framework Element, it is that the zoning and plan designations for the Hollywood Community Plan have enormous unmet growth capacity. The Hollywood Community Plan area was forecast for much greater population and housing growth based on existing plan designations and existing zoning than what actually occurred.

Therefore, based on this data, there is absolutely no reason to amend any portion of the Hollywood Community Plan area's plan designations or corresponding zoning. The implicit argument of Emerson College and the Planning Department that the area's underlying plan designations, zoning, and heights should be intensified and increased in

order to implement the General Plan is totally erroneous. To the contrary, given the policy of growth neutrality, a mid-course correction of down-planning and down-zoning to conform to the actual growth trends and infrastructure inadequacies of the local area would be more appropriate.

It is also important to remember in this discussion that the Framework's estimates for the year 2010 were forecasts, not targets. Because the Framework is a growth neutral document, it never presented population or housing targets to be met; it only presented its best guess on where the City of Los Angeles, including its 35 Community Plan area, would be in the year 2010.

VII. THERE IS NO EVIDENCE TO SUPPORT THE FINDINGS OF GENERAL PLAN CONSISTENCY

Neither the applicant nor the Planning Department has presented any evidence documenting the inadequacy of the General Plan as a result of Hollywood growth trends so dramatic that the implementation mechanisms of the General Plan, in particular plan designations, zoning, height districts, and Q conditions, must now be altered to allow greater density through the five requested discretionary actions.

Instead, the findings of the Department of City Planning used to justify the five discretionary actions requested by Emerson College cite scattered policies within the 1995 General Framework and/or the 1988 Hollywood Community Plan. While many of these policies are, in the abstract, nice and welcome, in no way do they constitute consistency with the central policy position of the General Plan; that it is growth neutral. Such features as claims of promoting the entertainment industry, supporting Hollywood businesses, reducing automobile trips, encouraging bicycle riding, combining different land uses, constructing a LEED certified building, facilitating walking and transit use, utilizing solar heating of water, and so forth may combine to produce an attractive educational facility, but they do not meet the threshold of consistency with the intent, goals, and purposes of the General Plan Framework Element. At best, they are tangential to the legal findings required to approve the five requested discretionary actions; the City claims consistency with secondary policies that it claims the project advances and then substitute those claims for the real findings that must be made.

In fact, in many cases these claims use findings to turn the General Plan Framework on its head. For example, the findings section of the Determination asserts that a project promotes transit use. This may be true, but in a case like this it is irrelevant. The role of transit, like all infrastructure categories, is to serve the demonstrated infrastructure needs of a given, growing population. Based on the General Plan Framework Element, there is no inherent need to construct additional infrastructure unless there is a demonstration that existing infrastructure has proven insufficient because increases in user demand have exceeded the General Plan's forecasts. Here, none of this has been demonstrated.

Specific to the Planning Commission action to waive the street dedication and street widening requirements, I note another basis for concluding that the General Plan

consistency findings are inadequate. The Determination appears to make no findings at all with respect to General Plan consistency. It is neither included in the General Plan Amendment nor otherwise addressed in the actions or findings of the Determination. (See Attachment 8)

VIII. CONCLUSION

Therefore, the General Plan consistency findings in the Determination, are not sufficient, and the appeal to reject the Determination approved by the City Planning Commission on May 27, 2010, for Emerson College should be accepted based on insufficient Findings that the project's five discretionary actions are consistent with the General Plan of the City of Los Angeles. Without any evidence that the Framework's forecasts of population and housing growth for the year 2010, as well as user needs for municipal infrastructure and services, have been surpassed for the Hollywood Community Plan area, the Findings offered in the Determination are not adequate to meet the legal criteria of a proper finding.

Appendix: RICHARD H. PLATKIN CONSULTANT CREDENTIALS

PROFESSIONAL QUALIFICATIONS

Richard (Dick) Platkin is a city planner and sociologist with three decades of professional experience in urban planning and applied social research. His city planning and research work has included transportation planning, housing policy and programs, economic development, public participation, general and community plans, specific plans and design overlay districts, streetscape plans, and discretionary zoning entitlements and appeals.

His professional planning career includes work in the private sector, non-profit sector, and two large public agencies, the Seattle and Los Angeles departments of city planning. Since retiring from a 20 year career with the Los Angeles Department of City Planning in 2007, Mr. Platkin joined Tierra Concepts to focus on projects with land use, economic development, and public policy components.

At the City of Los Angeles, Mr. Platkin had a wide range of supervisory and staff assignments, including neighborhood council liaison, General Plan public participation, preparation and implementation of numerous Specific Plans and Community Design Overlay Districts, and extensive project review.

His most notable projects included the preparation, adoption, administration, and review of the Ventura-Cahuenga Corridor Boulevard Specific Plan; the training of Los Angeles neighborhood councils to fully participate in the city's planning process, and the creation of joint design districts and streetscape plans for Canoga Park, Pacoima, Van Nuys, and Panorama City. In the case of Panorama City, his work also extended to the preparation of applications for transit projects, liaison with the Los Angeles Community Redevelopment Agency for a comprehensive community streetscape program, and technical support for the creation of a Business Improvement District (BID) established by the local business community.

EDUCATION

Bachelor of Arts, History, -- University of Michigan, Ann Arbor, Michigan
Master of Urban Planning -- University of Washington, Seattle, Washington
Master of Arts and Candidate in Philosophy, Sociology --
University of California - Los Angeles, Los Angeles, California

AWARDS AND AFFILIATIONS

American Institute of Certified Planners (AICP)
Planners Network: Steering Committee and Contributing Editor to Progressive Planning
American Sociological Association
Commendations from Los Angeles Department of City Planning for Ventura Specific Plan, Framework, South Central Task Force, and San Fernando Valley Light Rail Blue Ribbon Committee
Los Angeles City Council Commendations for Ventura-Cahuenga Boulevard Corridor Specific Plan and General Plan Framework
Donald G. Hagman award from APA for City Planning's South Central Task Force
Mellon Fellow at the University of Washington Department of City Planning



LOS ANGELES CITY PLANNING COMMISSION

200 N. Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.lacity.org/PLN/Index.htm

Determination Mailing Date: JUN 1 0 2010

CASE NO. CPC-2009-2504-GPA-ZC-
HD-SPR-GB
CEQA: ENV-2009-0469-EIR,
SCH#2009041149

Location: 5960 W Sunset Boulevard, (Including 5950 W. Sunset Boulevard, 1460 N. Gordon Street) and an Add Area that includes 5936-5946 N Sunset Boulevard, 1459-1467 N Tamarind Avenue and 1456 N Gordon Street

Council District: 13-Garcetti

Requests: General Plan Amendment, Zone / Height District Change, Site Plan Review, Green Building

Applicant: Emerson College,
Jacqueline W. Liebergott, President

At its meeting on May 27, 2010, the following action was taken by the City Planning Commission:

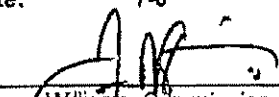
1. **Approved and Recommend** that the City Council **Adopt a General Plan Amendment** to revise the land use designation in the Hollywood Community Plan from Limited Manufacturing to **Regional Center Commercial** to both the project site and the Add Area.
2. **Approved and Recommend** that the City Council **Adopt a Zone Change** from [Q]C4-1 to **(T)[Q]C4-2D** to eliminate the [Q] Condition which prohibits residential uses (Ord. No. 165,652) and establish (T) Tentative Classifications and [Q] Qualified Conditions pursuant to this action.
3. **Approved and Recommend** that the City Council **Adopt a Height District Change** from Height District -1 to **Height District -2D**. The "D" Limitation limits the allowable Floor Area Ratio to 3.1:1 in lieu of the 6:1 FAR normally permitted in Height District 2, with no restriction as to height.
4. **Approved the Site Plan Review.**
5. **Waived** the required **2-foot street dedication** and **5-foot street widening** on Sunset Boulevard allowing a 100-foot public right of way width, a 35-foot half-roadway width and a 15-foot sidewalk width in lieu of conforming to the Major Highway Class II Street Standards.
6. **Adopted** the attached **Findings**, including, the Statement of Overriding Consideration and the Mitigation Monitoring and Reporting Program.
7. **Certified** that the Commission has reviewed and considered the information in the **Final Environmental Impact Report**.
8. **Recommend** that the City Council **certify** the **Final Environmental Impact Report**.
9. **Advised** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring.

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

This action was taken by the following vote:

Moved: Burton
 Seconded: Romero
 Ayes: Freer, Kezios, Orozco, Woo, Roschen
 Absent: Cardoso
 Vacant: One

Vote: 7-0



 James Williams, Commission Executive Assistant I
 City of Los Angeles Planning Commission

Appeals: If the *Zone Change* is disapproved in whole or in part, only the applicant may appeal that portion of the decision of the City Planning Commission. Regarding the *Site Plan Review*, any aggrieved party may appeal the decision of the City Planning Commission to the City Council within 20 days after the mailing date of this determination. Any appeal not filed within the 20-day

period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Public Counters at 201 N. Figueroa Street, Fourth Floor, Los Angeles, or at 6262 Van Nuys Boulevard, Suite 251, Van Nuys.

Final Appeal Date: JUN 30 2010

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.

Attachments: Findings, Conditions, Maps, Resolution
City Planner: Craig Weber

I. CONDITIONS FOR EFFECTUATING (T) TENTATIVE CLASSIFICATION REMOVAL

Pursuant to Los Angeles Municipal Code Section 12.32 G, the (T) Tentative Classification shall be removed by posting of guarantees through the B-permit process of the City Engineer to secure the following without expense to the City of Los Angeles, with copies of any approvals or guarantees provided to the Planning Department for attachment to the subject City Plan case file.

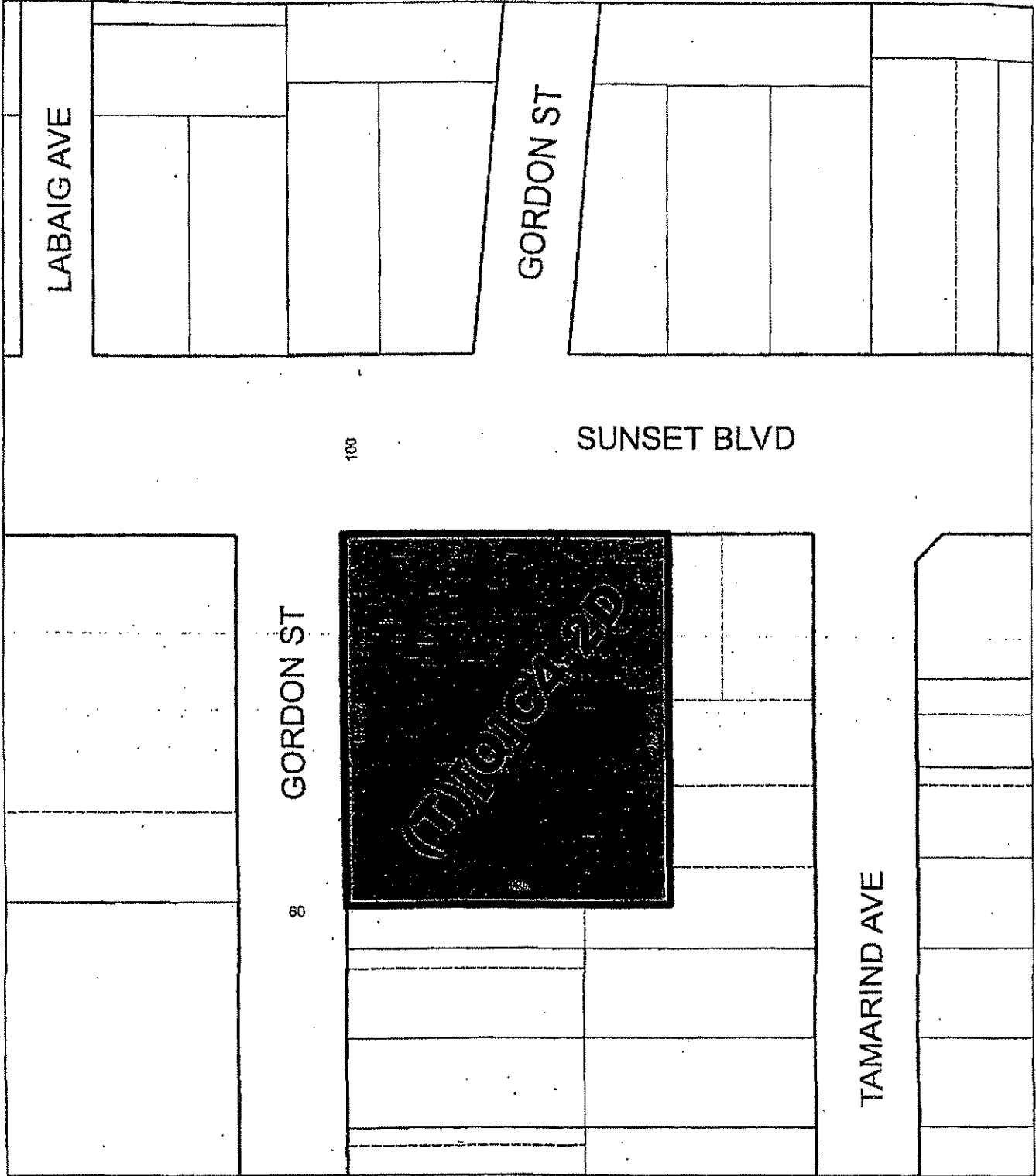
1. **Waiver of Dedication.** Pursuant to the determination made by the City Planning Commission, no dedication of the public right-of-way shall be required. The project shall maintain a 35-foot half roadway width along Sunset Boulevard and a 15-foot sidewalk.
2. **Sidewalk Improvements.** The project shall provide and improve a 6-foot sidewalk and a 4-foot landscape parkway along Gordon Street. The project shall provide a 9 foot sidewalk and 6foot landscape parkway along Sunset Boulevard.
3. **Street Trees.** Pursuant to the requirements of the *Urban Forestry Department*, the project shall provide the following street trees within the required landscape parkways:
 - a. Along Sunset Boulevard the applicant shall provide 3 *Washontonia robusta* (Mexican Fan Palm) with a minimum 20 feet brown trunk and 5 *Koeltreuteria paniculata* (Golden Rain) of a minimum 24 inch box size;
 - b. Along Gordon Street the applicant shall provide 5 *Brachychiton acerifolius* (Flame Tree) of a minimum 24 inch box size.
 - c. The removal of existing street trees shall be subject to the requirements of the Urban Forestry Department. The applicant is advised that Board of Public Works approval shall be obtained prior to the issuance of a Certificate of Occupancy for the removal of any tree in the public right-of-way.
4. **Catch Basins & Drainage.** Pursuant to the requirements of the *Bureau of Engineering*, the applicant shall relocate catch basins per B-Permit plan check requirements. Roof drainage and surface run-off from the property shall be collected and treated at the site and drained to the streets through drain pipes constructed under the sidewalk and through curb drains or connections to the catch basins.
5. **Sewer.** Pursuant to the requirements of the *Bureau of Engineering*, All sewerage facilities charges and bonded sewer fees are to be paid prior to the issuance of a building permit. The applicant is advised that extension of the 6-inch house connection laterals to the new property line may be required.
6. **Excavation.** Pursuant to the requirements of the Bureau of Engineering, the applicant shall submit shoring plans and lateral support plans to the Central District Office of that bureau for review and approval prior to excavating adjacent to the public right-of-way.
7. **Driveway Access and Circulation.** Prior to the commencement of parking layout and design, the applicant shall consult with the *Bureau of Engineering* and the *Department of Transportation* to verify driveway width and internal circulation requirements. Pursuant to the requirements of the *Department of Transportation*, all driveways shall be Case 2 driveways and shall be 30 feet wide if used for two-way operations and shall be 16 feet wide if used for one-way operations. Any gates shall have a minimum 20-foot reservoir space from the property line.
8. **Street Lighting.** Street lighting shall be installed to the satisfaction of the Bureau of Street Lighting.

ORDINANCE NO. _____

An ordinance amending Section 12.04 of the Los Angeles Municipal Code by amending the zoning map.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section __. Section 12.04 of the Los Angeles Municipal Code is hereby amended by changing the zone classifications of property shown upon a portion of the Zoning Map incorporated therein and made a part of Article 2, Chapter 1 of the LAMC, so that such portion of the Zoning Map shall conform to the zoning on the map attached hereto and incorporated herein by this reference.



NOT TO SCALE

D.M. 147 A 191	CPC 2009-2504-GFA-ZC-HD-SPR-GB
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LH/

060110



CONDITIONS OF APPROVAL**I. [Q] QUALIFIED CONDITIONS OF APPROVAL**

1. **Site Development.** The use and development of the subject property shall be in substantial conformance with the attached plans labeled as Exhibit No. 1, Sheets A-010.0 through A-4.570, stamped, signed and dated by the Department of City Planning, Community Planning Bureau attached to the subject case file and in concurrence with this action, except as the Director of Planning, through authority delegated by the City Planning Commission may subsequently approve modifications of the site plan.
 - a. Prior to the issuance of any building permits for the subject project, revised detailed development plans incorporating the conditions below shall be submitted for review and approval by the Department of City Planning for verification of compliance with the imposed conditions. These plans shall become the final approved plans, and subsequently labeled "Exhibit 2".
 - b. Minor deviations may be allowed in order to comply with all provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorizations.
2. **Use.** Pursuant to LAMC 12.16, Use of the subject property shall comply with the provisions the C4 zone.
3. **Density.** No more than 4 residential dwelling units and 220 guest rooms shall be constructed on the subject property. For the purposes of this project, all student beds shall be considered an individual guest room.
4. **Signs.** This approval does not permit any deviations from existing effective sign regulations. All signs onsite shall comply with the regulations and provisions of LAMC 14.4
5. **Automobile Parking.** Automobile parking shall be provided according to the following provisions:
 - a. Parking for faculty residential dwelling units shall be at a ratio of 1.5 spaces for every dwelling unit.
 - b. Parking for student guest rooms shall be at a ratio of 0.9 spaces for every guest room. For the purposes of this project, all student beds shall be considered an individual guest room.
 - c. Parking for retail and administrative space shall consist of 38 parking spaces.
6. **Bicycle Parking.** The project shall provide separate bicycle parking for inhabitants and visitors according the following ratios:
 - a. Bicycle parking for faculty dwelling units and student guest rooms shall be at a ratio of 0.5 spaces per dwelling unit or guest room. For the purposes of this project, all student beds shall be considered an individual guest room. Bicycle parking for faculty dwelling units and student guest rooms shall be provided in a secure and sheltered location that is not accessible to the general public. Bicycle parking for faculty dwelling units and student guest rooms need not comply with the provisions of LAMC 12.21 A 16 if the spaces are provided above the second floor in a private and secure location.
 - b. Bicycle parking for retail space shall be at a ratio of 1 space per 1,000 square feet of floor area. Bicycle parking spaces for retail space shall be immediately visible accessible from Sunset Boulevard.
 - c. Bicycle parking for administrative and academic space shall be at a ratio of 1 space per 1,000 square feet of floor area for the first 10,000 square feet of floor area and 1 additional space for each additional 10,000 square feet of floor area. Bicycle parking for administrative and academic space shall be located within one of the project's automobile parking levels.
7. **Shared Transit Resources.** The project shall provide shared transit resources for the use of students and faculty, for the life of the project, consisting of:
 - a. 1 shared ride car for every 10 students. Parking for shared ride cars may be included as part of the required residential parking in Condition No. 5.
 - b. 10 bicycles for the entire project.
 - c. An up-to-date map of available transit amenities, including local bus and subway routes within a ½ mile radius shall be posted within the student common room on the 5th floor of the project.

8. **Trash and Storage Areas.** Trash and storage areas shall be enclosed by a minimum six foot high solid masonry block walls and located within the structure's internal parking area. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.
9. **Graffiti.** Every building, structure, or portion thereof shall be maintained in a safe and sanitary condition and good repair. The premises of every building or structure shall be maintained in good repair and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104. The exterior of all privately owned buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to Municipal Code Section 91.8104.15.

II. DEVELOPMENT LIMITATIONS

1. **Floor Area (FAR).** Pursuant to the adopted Development Limitation, floor area on the site shall not exceed 3.1 times the buildable area of the lot.

III. ENVIRONMENTAL CONDITIONS OF APPROVAL

A. Aesthetics

Code-Required Measures

- A-1: Prior to the issuance of a grading permit, the Project Applicant shall submit a Landscape Plan, prepared by a state-licensed landscape architect, to the Bureau of Street Services, demonstrating all street trees in the public right-of-way meet the requirements of the current Street Tree Division Standards.
- A-2: Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- A-3: The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to Municipal Code Section 91.8104.15.

Project-Specific Construction Mitigation Measures

- A-4: Construction equipment, debris and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

Project-Specific Operational Mitigation Measures

- A-5: All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decision maker.
- A-6: The Proposed Project shall include directional lighting in a manner that is consistent with the CRA/LA's Draft Sunset Improvement Plan and City of Los Angeles Walkability Checklist. The open terraces, exterior balconies and the ground floor parking shall be designed to ensure that lighting does not spill onto adjacent residential properties.
- A-7: The Proposed Project's façades and windows shall be constructed or treated with low-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

B. Air Quality

SCAQMD-Required Mitigation Measures

- B-1: Water exposed surfaces and unpaved roads (manage haul road) twice a day as required under SCAQMD Rule 403—Fugitive Dust.
- B-2: The Applicant's contractors shall reduce speed on unpaved roads to less than 15 mph.

- B-3:** The Applicant's contractors shall provide water to stabilize material while loading/unloading to reduce fugitive dust emissions.

Project Mitigation Measures

- B-4:** The Project Applicant shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for an extended period of time (i.e., 5 minutes or longer).
- B-5:** The Project Applicant shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines to the extent feasible.
- B-6:** The Project Applicant shall use late model heavy-duty diesel-powered equipment at the Project Site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks).
- B-7:** The Project Applicant shall require by contract specifications that all heavy-duty diesel-powered equipment operating and refueling at the Project Site would be equipped with diesel oxidation catalysts to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment). (This measure does not apply to diesel-powered trucks traveling to and from the Site).
- B-8:** The Project Applicant shall limit truck and equipment idling time to five minutes or less.

C. Geology and Soils

Code-Required Measures

- C-1:** Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
- Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
 - Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
 - Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.
- C-2:** The design and construction of the Project shall conform to the Uniform Building Code seismic standards and in accordance with the recommendations provided in Subsurface Investigations and Foundation Design Recommendations, Emerson College – Los Angeles Center, Los Angeles California, prepared by Haley & Aldrich, Inc, dated January 15, 2010, as approved by the Department of Building and Safety.

Project-Specific Mitigation Measures

- C-3:** The Applicant shall conduct pre-construction surveys of the adjacent properties, including 5936-5946 West Sunset Boulevard/1471 Tamarind Place, 1469 Tamarind Avenue, 1467 Tamarind Avenue, 1463 Tamarind Avenue, 1453 Tamarind Avenue and 1457 Gordon Street with the approval of the affected property owners prior to the start of the planned construction. Additionally, West Sunset Boulevard and Gordon Street should be surveyed where they are adjacent to the Project Site. The preconstruction surveys should include survey video, color photography, and summary reports.
- C-4:** A geotechnical instrumentation program shall be designed and executed during construction. The purpose of the geotechnical instrumentation program is to assess predictions of soil and structure behavior, provide documented performance for the Owner's records, monitor and document the Contractor's performance,

provide early warning of problems, and aid assessments of the need for measures to mitigate unacceptable movements. Recommended geotechnical instrumentation includes the following:

- Offset survey points and reference points to measure horizontal and vertical movements of the excavation support system, adjacent buildings, structures and streets relative to initial locations (i.e., prior to/immediately following installation of the excavation support system).
- Engineering seismographs to measure vibrations at adjacent buildings.

D. Hazardous Materials/Risk of Upset

Project-Specific Mitigation Measures

- D-1:** Prior to site clearing at the Project Site, a soil management plan shall be prepared to address how localized area(s) of impacted soil, if encountered during Site development, are to be monitored, excavated from the Site, and disposed of in accordance with applicable regulatory standards. In the event that contaminated soils are identified on-site, appropriate remediation steps such as soil removal and disposal shall be taken and a No Further Action letter shall be obtained by the LARWQCB and submitted to the City of Los Angeles Department of Building and Safety prior to construction of the building's foundation.
- D-2:** The Proposed Project shall maintain appropriate fire and police access to the Project Site by keeping driveways and/or alternative accessways clear of construction equipment, building material, and debris during the construction process.
- D-3:** The Project Applicant shall prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. The emergency response plans shall include, but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

E. Hydrology and Water Quality

Code-Required Measures

- E-1:** The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Department of City Planning and Stormwater Division of Bureau of Sanitation binding the owners to post construction maintenance of the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan or as per the manufacturer's instructions.
- E-2:** The Project Applicant shall obtain all necessary permits from the RWQCB prior to the installation of a temporary and/or permanent dewatering system, if such a system is determined to be necessary for development of the Proposed Project. Procurement of all applicable RWQCB permits will ensure the quality of groundwater discharged into the surrounding storm drain or sewer infrastructure.
- E-3:** All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials, including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.
- E-4:** Leaks, drips, spills, and contaminated soil shall be cleaned immediately to prevent contamination from entering into the storm drains.
- E-5:** Hosing down of pavement at material spills shall be prohibited. Dry cleanup methods shall be used whenever possible.
- E-6:** Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or covered with tarps or plastic sheeting.
- E-7:** Gravel approaches shall be used where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.
- E-8:** All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.

Operational Mitigation Measures

- E-9:** The Project Applicant shall implement BMPs to treat the first ¼ inch of rainfall in a 24-hour period or the first flush. The design of structural BMPs shall be in accordance with the City's Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required.

- E-10: Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.
- E-11: Trees and other vegetation shall be maximized by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants. Compliance with this measure will increase the retention and filtration of surface water runoff and conserve water.
- E-12: Appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, shall be incorporated as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.
- E-13: All storm drain inlets and catch basins within the Project area shall be stenciled with messages and/or graphical icons that discourage the dumping of improper materials into the storm drain system (such as "NO DUMPING - DRAINS TO OCEAN"). Legibility of stencils and signs shall be maintained. (Prefabricated stencils can be obtained from the Department of Public Works, Stormwater Management Division.)
- E-14: Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- E-15: Storage areas shall be paved and sufficiently impervious to contain leaks and spills.
- E-16: Storage areas shall have a roof or awning to minimize collection of stormwater within the secondary containment area.
- E-17: Drainage from roofs and pavement shall be diverted around the trash container areas.
- E-18: Trash container areas shall be screened or walled to prevent off-site transport of trash.
- E-19: Runoff shall be treated prior to release into the storm drain. (Three types of treatments are available, (1) dynamic flow separator; (2) filtration or (3) infiltration. Dynamic flow separator uses hydrodynamic force to remove debris, and oil and grease, and is located underground. Filtration involves catch basins with filter inserts. Infiltration methods are typically constructed on-site and are determined by various factors such as soil types and groundwater table.) If utilized, filter inserts shall be inspected every six months and after major storms, and shall be cleaned at least twice a year.
- E-20: Any connection to the sanitary sewer shall require authorization from the Bureau of Sanitation.
- E-21: The subterranean and above-grade parking lot areas shall include oil and grease separator traps to filter on site contaminants and prevent increased contamination of the City's storm drain system.

F. Noise

Code Required Measures

- F-1: The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. The Project shall also comply with Sections 112.01 and 112.06 of the LAMC relating to amplified music and places of public entertainment.
- F-2: Construction and site clearing shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.
- F-3: The Project shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which ensure an acceptable interior noise environment. Specifically, the Project Applicant or its contractor shall submit an acoustical report prior to the issuance of building permits that demonstrates that the proposed building design and materials would ensure that interior noise levels attributable to exterior sources are no greater than 45 dBA CNEL.

Project-Specific Mitigation Measures

- F-4: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- F-5: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible

from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

- F-6: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- F-7: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.
- F-8: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.
- F-9: Noticing of the scheduling of various phases of construction shall be submitted to the adjacent recording studios and property abutters 90 days in advance of activities and will identify the dates of activity, the hours of activity, types of equipment to be used on each day and the associated noise and vibration levels anticipated. Lane closures on Gordon Street shall be similarly noticed.
- F-10: Concrete, not metal, shall be used for construction of parking ramps. The interior ramps shall be textured to prevent tire squeal at turning areas.
- F-11: The audio system and activities during special events on all outdoor terraces and assembly spaces shall be designed and managed such that the maximum noise levels generated by special events shall not exceed ambient noise level by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level is at least 75 dBA CNEL. Sample noise measurements shall be recorded during the first three special events to demonstrate that acceptable noise levels are achieved. The Project Applicant shall keep a written log of any noise-related complaints that are received and shall make the necessary corrective actions to effectively satisfy the above noise standards to the satisfaction of the Planning Director and Building and Safety. Noticing of the scheduling of special events and other various uses of the second and fifth level terraces shall be submitted to the adjacent recording studios and property abutters 45 days in advance of activities and will identify the dates and type of activity.
- F-12: The Applicant shall retain a qualified vibration consultant to take vibration monitoring measurements regularly in order to assess the actual impact of vibration on adjacent structures and to incorporate and adjust techniques as necessary to reduce impact.
- F-13: The Applicant shall retain an experienced vibration engineer to plan for and monitor vibration impacts on the adjacent studios during site clearing, earthmoving and foundation construction, and structural construction, to the extent that the adjacent studio owner allows the Applicant to conduct monitoring within the adjacent studio and to understand the baseline vibration impacts prior to site-clearing. The engineer shall insure the incorporation of maximum vibration mitigation into every phase of Project development.
- F-14: The Applicant shall install a temporary absorptive insulating sound curtain to a height of 8 feet above grade during the construction period that effectively blocks the line-of-sight between the Project Site and the adjacent EastWest Studios building.

I. Public Utilities

Water - Code-Required Measures

- I-1: The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). In addition, the Department of Water and Power requires the following conservation measures for all new development in the City of Los Angeles:
- High efficiency toilets (1.28 gallons per flush or less, includes dual flush);
 - High efficiency urinals (0.5 gallons per flush or less, includes waterless);
 - Restroom faucet flow rate of 1.5 gallons per minute or less;
 - Public restroom self-closing faucets;

- Showerhead flow rate of 2.0 gallons per minute or less;
- Limit of one showerhead per shower stall;
- High efficiency clothes washers (water factor of 6.0 or less);
- High efficiency dishwashers (Energy Star rated);
- Domestic water heating system located in close proximity to point(s) of use, as feasible; use of tankless and on-demand water heaters as feasible
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration;
- Require onsite water recycling systems for wastewater discharge for commercial laundries, dye houses, food processing, certain manufacturing operations, etc. (subject to a payback threshold of five years or less). Mandate water recycling system for all new car wash facilities.
- Strict prohibition of single-pass cooling;

Note: Single pass cooling refers to the use of potable water to extract heat from process equipment

Irrigation system requirements:

- Weather-based irrigation controller with rain shutoff;
- Flow sensor and master valve shutoff (large landscapes);
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;
- Use of landscape contouring to minimize precipitation runoff;

Metering:

- All commercial spaces require individual metering and billing for water use;
- All irrigated landscapes of 5,000 square feet or more require separate metering or submetering;
- Mandated use of recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary);
- Standard Urban Stormwater Mitigation Plan (SUSMP): Compliance with all City of Los Angeles SUSMP requirements, and encouraging implementation of Best Management Practices that have stormwater recharge or reuse benefits.

Energy - Code-Required Measures

I.3-1: The Proposed Project shall meet or exceed all Title 24 energy conservation requirements as they apply in the City of Los Angeles.

Energy - Project Mitigation Measures

I.3-2: Built-in appliances, refrigerators, and space-conditioning equipment shall exceed the minimum efficiency levels mandated in the California Code of Regulations.

I.3-3: The Project Applicant shall install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces that provides the following:

- A variable air-volume system that results in minimum energy consumption and avoids hot water energy consumption for terminal reheat;
- A 100-percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;
- Sequentially staged operation of air-conditioning equipment in accordance with building demands; and
- The isolation of air conditioning to any selected floor or floors.

I.3-4: The Project shall be designed in a manner that utilizes cascade (i.e., passively transferred) ventilation air from high-priority areas before being exhausted, thereby decreasing the volume of ventilation air required. For example, air could be passively transferred from occupied space to corridors and then to mechanical spaces before being exhausted.

- I.3-5: The Applicant shall incorporate a recycle lighting system heat for space heating during cool weather. Exhaust lighting-system heat from the buildings, via ceiling plenums, shall be used to reduce cooling loads in warm weather.
- I.3-6: The Applicant shall install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.
- I.3-7: The Applicant shall ensure that buildings are well sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. Where applicable, building entrances shall be designed with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air.
- I.3-8: The Applicant shall conduct a performance check of the installed space-conditioning system prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the Project operate as designed.
- I.3-9: Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light-colored materials to reflect more light and, thus, increase lighting efficiency.
- I.3-10: White, high albedo, and reflective material shall be used for roofing in order to meet California standards for reflectivity and emissivity to reject heat.
- I.3-11: Thermal insulation that exceeds requirements established by the California Code of Regulations shall be installed in walls and ceilings.
- I.3-12: Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
- I.3-13: The Project Applicant shall install heat-rejecting window treatments, such as films, blinds, draperies, or others on appropriate exposures.
- I.3-14: The Project Applicant shall install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption. Reflectors shall be used to direct maximum levels of light to work surfaces.
- I.3-15: The Project Applicant shall install photosensitive controls and dimmable electronic ballasts to maximize the use of natural daylight available and reduce artificial lighting load.
- I.3-16: The Project Applicant shall install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
- I.3-17: The Project Applicant shall install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- I.3-18: Mechanical systems (HVAC and lighting) in the building shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- I.3-19: The Project Applicant shall incorporate windowless walls or passive solar inset of windows into the Project for appropriate exposures.
- I.3-20: Design Project shall focus pedestrian activity within sheltered outdoor areas.

Solid Waste - Code-Required Measures

- I.4-1: The Project Applicant shall develop a construction and site clearing debris recycling program to divert construction related solid waste and site clearing debris from area landfills.
- I.4-2: The Project Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the Project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

J. Public Services

Police - Project-Specific Mitigation Measures

- J.1-1: The Project shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers.
- J.1-2: The Project Applicant shall employ security guards to monitor and secure the Project Site after hours during the construction process to secure the site and deter any potential criminal activity.

J.1-3: The Project Applicant shall develop and implement a Security Plan in consultation with the LAPD outlining the security services and features to be provided in conjunction with the Proposed Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD Central Bureau Commanding Officer. Said security plan may include some or all of the following components:

- Provisions for an on-site private security force for the mixed-use trade school. Through individual lease agreements for the proposed trade school/retail uses, private on-site security services shall provide a 24-hour presence. Security officers shall be responsible for patrolling all common areas including the back service corridors and alleys, parking garages, and stairwells.
- The parking garage shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that would provide a direct connection with the on-site security force or the LAPD 911 emergency response system.
- The proposed security plan shall incorporate low-level and directional security lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, service areas, and parking areas with sufficient illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

Fire – Code Required Mitigation Measures

- J.2-1** All requirements of LAMC Section 57.09.06, pertaining to the installation of automatic sprinkler systems in high-rise structures shall be followed.
- J.2-2.** Fire Department access shall remain clear and unobstructed at all times during the construction period.
- J.2-3** Access for Fire Department apparatus and personnel to and into all structures shall be required.
- J.2-4** The Proposed Project shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan for the City of Los Angeles.
- J.2-5** The Applicant shall submit an emergency response plan for approval by the decision maker and the Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.
- J.2-6** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Schools - Code Required Measures

- J.3-1** The Project applicant shall pay all applicable school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the Project Area.

Schools – Project Specific Mitigation Measures

J.3-2: School Pedestrian/Traffic Safety Access

- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- Not haul past affected school sites, except when school is *not* in session. If that is infeasible, not haul during school arrival and dismissal times.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, adjacent to school sites.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on these streets during school hours.

- Install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.

Parks & Recreation – Project Specific Mitigation Measures

J.4-1: The applicant shall provide adequate space for bicycle storage onsite and shall operate a free bicycle share program with a minimum of 10 bicycles for its registered students and faculty to share free of charge

K. Transportation

Construction Mitigation Measures

- K-1** In order to mitigate the potential temporary traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project Applicant shall, prior to construction, develop a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan shall include temporary roadway striping and signage for traffic flow as necessary, as well the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project if necessary.
- K-2** Prior to the issuance of a grading permit, the Project Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Project Applicant to the following haul route conditions:
- All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Transportation, which shall avoid residential areas and other sensitive receptors to the extent feasible.
 - Hours of operation shall be from 9:00 A.M. to 4:00 P.M., unless approval is obtained by the Mayor's office and LADOT to begin hauling at 7:00 A.M. If approval is granted the hours of operation shall be from 7:00 A.M. to 4:00 P.M.
 - Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.
 - Trucks shall be restricted to 18-wheel dump trucks or smaller.
 - The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).
 - Streets shall be cleaned of spilled materials at the termination of each work day.
 - The final approved haul routes and all the conditions of approval shall be available on the job site at all times.
 - The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.
 - All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - All trucks are to be watered at the job site to prevent excessive blowing dirt.
 - All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.
 - The Project Applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.
 - All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.
 - "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.
 - One flag person(s) shall be required at the job and dump sites to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."
 - The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.

- Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at 213.485.3711 before the change takes place.
- The permittee shall notify the Street Use Inspection Division, 213.485.3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.
- A surety bond shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling (213) 977-6039.

K-3 In order to mitigate potential parking impacts from construction workers the Project Applicant shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

V.C Cultural Resources

Archaeological Resources

V.C-1 If any archaeological materials are encountered during the course of project development, all further development activity shall halt and:

- a. The services of an archaeologist shall be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- b. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- d. Project development activities may resume once copies of the archaeological survey, study or report are submitted to:
 SCCIC Department of Anthropology
 McCarthy Hall 477
 CSU Fullerton
 800 North State College Boulevard
 Fullerton, CA 92834
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to obtaining a grading permit.

Paleontological Resources

V.C-2: If any paleontological materials are encountered during the course of project development, all further development activities shall halt and:

- a. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file

indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to obtaining a grading permit.

IV. ADMINISTRATIVE CONDITIONS OF APPROVAL

1. **Approval, Verification, and Submittals.** Copies of any approvals, covenants, bonds, letters of credit, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Planning Department for placement in the subject file.
2. **Building Plans.** Prior to this issuance of a building permit, a copy of the first page of this grant and all its conditions of approval; and/or any subsequent appeal of this grant and its resultant conditions and/or letters of clarification; or any written approval resulting from a change to the plans hereby approved shall be printed on the building plans submitted to the City Planning Department and the Department of Building and Safety. Any changes to plans required by this Department, or any other City Department shall be represented on the Building Plans.
3. **Building Permit Clearance.** At the time of building permit clearance sign-off, the applicant shall provide four sets of final building plans, reflecting all changes as required, to the Department of City Planning. Two sets shall be ultimately submitted to the Department of Building and Safety, one set shall be retained by the Department of City Planning, and attached to the subject case file as "Exhibit No. 2" and one set shall be retained by the applicant.
4. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except as limited by Development Limitations prescribed herein.
5. **Covenant.** Prior to the issuance of any permits by the Department of Building and Safety for the subject project, a *Covenant and Agreement concerning all information contained in these conditions shall be recorded in the County Recorder's Office.* The Covenant shall run with the land and shall be binding on any subsequent owners, heirs, or assigns. Further, the Covenant and Agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date must be given to the City Planning Department for attachment to the subject file case.
6. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.
7. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
8. **Indemnification.** The applicant shall defend, indemnify and hold harmless the City, its agents, officers, or employees from any claim, action, or proceeding against the City or its agents, officers, or employees to attack, set aside, void or annul this approval which action is brought within the applicable limitation period. The City shall promptly notify the applicant of any claim, action, or proceeding and the City shall cooperate fully in the defense. If the City fails to promptly notify the applicant of any claim, action, or proceeding, or if the City fails to cooperate fully in the defense, the applicant shall not thereafter be responsible to defend, indemnify, or hold harmless the City.

FINDINGS

1. City Charter Section 558 & LAMC Section 12.32 C 2

The Los Angeles City Charter Section 558 and Los Angeles Municipal Code (LAMC) Section 12.32.C 2 require that the City Planning Commission and City Council find that any proposed land use ordinance is in conformity with public necessity, convenience, general welfare and good zoning practice. The project requires the following land use actions:

- **General Plan Amendment** An amendment of the Hollywood Community Plan land use designation for the parcel at 5950-5960 W Sunset Boulevard and 1460 N Gordon Street (Lot A of Tract TR5055, hereafter referred to as the Emerson Project Site) and the parcels at 5936-5946 W Sunset Boulevard; 1459-1471 N Tamarind; and 1456 N Gordon (Lots A and 188 of the Grider and Hamilton Tract, hereafter referred to as the Add Area) from Limited Manufacturing to Regional Center Commercial (as shown on Exhibit B-1);
- **Zone Change:** A zone change to the Emerson College site from [Q]C4 to C4, eliminating the qualified condition effectuated by Ordinance No. 165,652 that prohibits residential uses except as permitted by an industrial zone (as shown on Exhibit B2);
- **Height District Change:** A height district change from height district -1, which allows unlimited building height in a C-zone with a floor area limitation of 1.5 times the buildable lot area to height district-2D which allows for unlimited building height in a C-zone with a floor area limitation of 6 times the buildable lot area. The proposed D limitation would further limit floor area to 3.1 times the buildable lot area.

The proposed General Plan Amendment, Zone Change and Height District Change are in conformity with public necessity, convenience, general welfare and good zoning practice for the following reasons:

- a. The **General Plan Amendment** corrects an existing inconsistency between the Limited Manufacturing land use designation and the existing C4 zone classification that exists at both the Emerson Project Site and the Add Area. The existing Limited Manufacturing designation allows for M1, MR1, P and PB zones. However, the Emerson Project Site and the Add Area are zoned [Q]C4-1D and the C4 designation is not a corresponding zone with the Limited Manufacturing designation. The proposed Regional Center land use designation allows for C4, C2, P and PB zones. The project would seek to maintain its C4 zone at both the Emerson Project Site and the Add Area. Consistency between General Plan land use categories and zoning conforms to public necessity, convenience, general welfare and good zoning practice in that it provides for a clear and effective implementation of the City's General Plan through zoning; removes any lack of clarity to stakeholders as to what may be appropriately developed at both the Emerson Project Site and the Add Area; and allows for the implementation of a project that is consistent with the whole of the City's various General Plan provisions and policies as discussed below.
- b. The **General Plan Amendment** provides for stability and growth in the entertainment industry within the Hollywood area. The General Plan Amendment will allow for the construction and use of a trade school campus for a renowned college, with four faculty apartments and 220 student guest rooms, that specializes in visual and media arts within the central Hollywood studio district and facilitates a use of land that is synergistic and beneficial to the entertainment production environment in Hollywood. The Hollywood Community Plan and the Hollywood Redevelopment Plan both recognize the need to maintain and foster the entertainment industry in Hollywood as a major economic engine. The proposed project is compatible with and supports the entertainment industry as Emerson College prepares and trains their students for internships and permanent jobs in the entertainment field. Emerson College fields of study include communication, marketing, communication sciences and disorders, journalism, the performing arts, the visual and media arts, and writing, literature and publishing.

The proposed project is also an entertainment industry related use which is compatible with the nearby studios on Sunset Boulevard such as Sunset Gower Studios, KTLA Television (Sunset Bronson) Studios, and Nickelodeon Studios as well as other nearby entertainment industry uses. The proposed project will foster the entertainment industry by providing manpower as well as a permanent educational institution supporting the entertainment industry.

- c. The **General Plan Amendment** facilitates the construction of a campus that maximizes onsite use and minimizes vehicular trips. The requested Regional Center land use designation, coupled with the existing C4 zone make the Emerson Project Site eligible for the exceptions included in LAMC Section 12.22 A.18. Developments Combining Residential and Commercial Uses. With the effectuation of a Regional Center land use designation and a corresponding C4 zone, the exceptions enumerated in LAMC Section 12.22 A.18 allow for the development of any use permitted in the R5 zone, where the C4 zone would normally only allow for residential uses in the R4 zone: The R5 residential density, which will apply after the approval of a land use designation change, allows a minimum lot area per dwelling unit of 200 square feet. Furthermore, the R5 Zone has no requirement for the minimum lot area per guest room (the Project includes 4 dwelling units and 220 guest rooms).

The effectuation of a Regional Center land use designation coupled with the exceptions allowed by LAMC Section 12.22.A 18 allows for the development of an academic campus with residential facilities for students and faculty. A campus that provides both academic space and living quarters for students and faculty is both beneficial and necessary in that it allows for a vibrant and functional academic campus while simultaneously diminishing the number of vehicular trips that would otherwise be associated with the campus were the residential component required to locate offsite. The applicant has indicated that the 220 students at the campus would be completing internships of less than one year at the proposed facility. In addition to their studies at the campus, many students will be involved in work at the various production facilities in close proximity to the project site. The location of residential and academic space on a unified campus presents an obvious benefit to both the campus and the community in that it allows 220 students to attend classes without necessitating vehicular trips. The negation of vehicular trips associated with attending class lessens both traffic and air pollution, both of which are in conformance with public necessity, convenience, general welfare and good zoning practice. The Final Environmental Impact Report prepared for the project indicates that there will be no traffic or air pollution impacts associated with the operational phase of the project.

To ensure that students and faculty housed at the Emerson Project site are able to maximize transit use and non-vehicular modes of transportation, thus keeping the project in line with public convenience, necessity and general welfare, the Department of City Planning has recommended that Conditions of Approval be imposed upon the project; require that a transit map be made available to students within a student common area and that a range of bike racks for students, faculty and visitors be provided.

- d. The **Zone Change** removes a qualified condition at the Emerson Project Site (Ordinance No. 165,652) that currently prohibits residential uses, thus allowing for the use of student guest rooms and faculty apartments at the proposed campus, creating an academic environment that is beneficial to the college, the students, the entertainment production environment in Hollywood; and the surrounding neighborhood. As evidenced in Finding 1.c above, such a zone change would be beneficial because it reduces the number of vehicular trips that would otherwise be associated with a campus and separate/off-site residential facility, and it allows for the creation of a productive and successful academic learning environment that benefits the students, college and the Hollywood entertainment production community.
- e. The **Height District Change** allows for the construction of a 10-story vertical campus that will promote the general welfare by replacing a surface parking lot with a newly constructed building. The increase in buildable floor area from 1.5:1 to 3.1:1 allows for the construction of a campus that

provides 38,100 square feet of academic/administrative space; 70,500 square feet of residential space; and 6,400 square feet of ground floor retail space on a unified development site. In addition to the benefits associated with a unified campus development cited above in Findings 1b-1d, the height and scale of the structure that would be built represent good urban design principles that will improve the appearance and functionality of the area. The building's massing can be described as originating from a cube shaped mass which has been carved out from the center to create a large outdoor room that opens up to the rear of the site and a portal through the front building façade. The main building elements include a building podium, two narrow rectangular shaped towers along the east and west side of the property that represent the walls of the outdoor room a bridge structure between the tenth floor residential towers consisting of beams that support the helipad roof structure and provide lateral support for the building facade. The development will become an iconic building that identifies and serves as a gateway to Hollywood.

The urban design features include the mixed-use nature of the building which combines academic/administrative spaces with student and staff/faculty housing and ground level retail. The ground level retail on Sunset Boulevard will provide food and small essentials to Emerson students and the community. The storefront will be oriented towards Sunset Boulevard both visually and physically with an entry door on the sidewalk. By locating this mixed-use project, which includes a residential component, near major transit, job centers, shopping and entertainment areas, the proposed project will facilitate student, faculty, and staff interaction with the community, bringing more people onto the street, providing more customers for local businesses and increasing safety by adding "eyes on the street".

The Silver LEED Certification the Applicant is pursuing will also promote the general welfare by including many green and eco-friendly elements in the building. Some of the green elements include the following: a double façade on the residential towers that maximizes natural lighting and simultaneously minimizes excessive heat gain; operable windows in the residential towers that maximize the use of natural ventilation; a solar hot water system; regional materials and certified wood; onsite infiltration, reducing pollution from storm water runoff; maximum water and energy efficient equipment such as radiant heating and cooling and low flow fixtures. Overall, a LEED certified building requires the thoughtful use of resources both during construction and throughout the operation of the building. The Applicant's commitment to green technologies and measures will improve the welfare of the immediate neighborhood and Hollywood community.

2. City Charter Section 556

The Los Angeles City Charter Section 556 requires that the City Planning Commission and City Council find that any proposed land use ordinance is in conformity with the purposes, intent and provisions of the City's General Plan. As stated in Finding 1, the Project requires the following land use ordinance actions:

- **General Plan Amendment:** An amendment of the Hollywood Community Plan land use designation for the parcel at 5950-5960 W Sunset Boulevard and 1460 N Gordon Street (Lot A of Tract TR5055, hereafter referred to as the Emerson Project Site) and the parcels at 5936-5946 W Sunset Boulevard; 1459-1471 N Tamarind; and 1456 N Gordon (Lots A and 188 of the Grider and Hamilton Tract, hereafter referred to as the Add Area) from Limited Manufacturing to Regional Center Commercial;
- **Zone Change:** A zone change to the Emerson College site from [Q]C4 to C4, eliminating the qualified condition effectuated by Ordinance No. 165,652 that prohibits residential uses except as permitted by an industrial zone;
- **Height District Change:** A height district change from height district -1, which allows unlimited building height in a C-zone with a floor area limitation of 1.5 times the buildable lot area to height district-2D which allows for unlimited building height in a C-zone with a floor area limitation of 6 times the buildable lot area. The proposed D limitation would further limit floor area to 3.1 times the buildable lot area.

The proposed General Plan Amendment, Zone Change and Height District Change are in conformity with the purposes, intent and provisions of the City's General Plan based upon the following:

a. General Plan Framework, Land Use Goals, Objectives and Policies

GOAL 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.*

The construction of the proposed 10-story trade school with ancillary housing and ground level retail represents a significant and catalytic investment to the Hollywood area. The Emerson Project Site is currently blighted and underutilized with a surface parking lot bounded by a chain link fence. Aside from physically improving the site, the proposed project will also provide both temporary and permanent jobs, and will facilitate job growth in the entertainment industry by providing hands-on learning and internship opportunities in Los Angeles. The campus combines academic and residential space allowing the students, faculty and staff who will live on-site to eliminate a daily commute to the campus. The close proximity of some internship positions to the site will encourage students to take alternate modes of transportation which reduces traffic and air pollution. Students residing onsite will be encouraged to utilize shared-ride cars, public transit and bicycles as a mode of transit thereby further lessening potential impacts to roadway infrastructure and air quality. The Department of City Planning has recommended Conditions of Approval that will further facilitate the use of transit and bicycles as modes of transit by making transit information readily available to students and by providing secure locations for bicycles to be stored. The nearby entertainment venues such as restaurants, bars, music venues and theaters will facilitate pedestrian activity in the evenings and on weekends, thus moving towards a more livable city.

Objective 3.2: *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

As stated in Goal 3A above, locating the trade school in the heart of Hollywood has decreased the commuting distance to the student internships and placed most internships within a distance that can easily be accessed by public transit, bicycling or walking. The mixed-use nature of the project with the trade school use and the ancillary housing will eliminate the commute for students and select staff/faculty when using the academic spaces.

Policy 3.2.1: *Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.*

The pattern of development on Sunset Boulevard, from the Hollywood Freeway to Gower Street is in transition. Aside from the two large studios on the south side of Sunset Boulevard, most of the commercial uses are one or two story buildings. However, recently approved development projects nearby, though yet un-built are much larger in scale and intensity and include mid- to high-rise mixed use developments. The "Sunset & Gordon" project on the north side of Sunset Boulevard (5929 - 5945 W. Sunset Boulevard) and to the west of the project site was approved for a 23-story 260-foot high mixed-use development with residential, retail, office uses and a public park. The studios one block to the east of the project site obtained an approval for a 20-story office building with studio related and commercial office space. The proposed 10-story mixed-use trade school is compatible

with the size and scale of other recently approved projects and with the new development pattern that is extending into the area from the west.

Policy 3.2.3: *Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.*

The proposed mixed-used project places students within walking and cycling distance to both internships and entertainment and recreational venues. To further facilitate the use of bicycles by students the Department of City Planning has required that the applicant provide bicycle parking for both visitors to the site as well as for students who will reside at the site. The Department of City Planning has recommended a Condition of Approval that a bicycle rack that can accommodate a minimum of six bicycles be placed in a prominent location along the project's Sunset Boulevard street frontage. This required bike rack would serve visitors to the site—namely the 6,400-square-foot retail space at a ratio of one bicycle space for every 1,000 square feet of retail floor area, which is consistent with the City's bicycle rack requirements within adopted Transit Oriented Districts. The Department of City Planning has also recommended a Condition of Approval requiring that racks for no less than 112 bicycles be installed in a secure location, such as students suites; and that 13 bike racks be installed in the parking structure for staff and faculty use. The ratios utilized in calculating parking are also consistent with the City's bicycle parking requirements within Transit Oriented Districts.

During daytime hours, the building users can utilize the ground level space for food options or they can walk to the various nearby restaurants. In the evenings, students can walk to various existing restaurant, bar and entertainment venues in the area.

Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

The proposed project is a mixed-use development that exemplifies the type of development Objective 3.4 encourages. The proposed project includes academic space, residential space for the students and staff/faculty and ground level retail that includes a student store. The surrounding commercial uses and residential neighborhood to the south will remain.

Policy 3.4.1: *Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram*

The proposed mixed-use project contains academic space, residential space for students and faculty/staff and ground level retail. The project site is located on Sunset Boulevard which is a designated Major Highway Class II. Sunset Boulevard is a prominent street that runs from Downtown Los Angeles to the ocean.

The Metro Red Line Hollywood/Vine Station is located approximately 1/2 mile away from the Project Site. The Metro Red Line is the 17-mile subway that runs from Union Station in downtown Los Angeles to North Hollywood in the San Fernando Valley, offering stops throughout the Hollywood, Westlake and Downtown areas. The Red Line also connects to the Metro Orange Line which runs through the San Fernando Valley, connecting to Warner Center, the Metro Blue Line which runs to Long Beach and the Metro Gold Line which runs to Pasadena and East Los Angeles. The 1/2 mile proximity of the Hollywood/Vine Red Line station is considered to be within a range that can comfortably be walked by most patrons who would wish to utilize the Metro from the Project Site.

Additionally, there are various Metro bus lines with stops conveniently located near the subject site. Bus Line 302 provides limited stop service and runs east/west on Sunset Boulevard, connecting Union Station in downtown LA to the Pacific Palisades. The Metro Bus Line 180 bus stops are located on Vine Street with service connecting the South Bay Galleria to Hollywood.

Objective 3.10: *Reinforce existing, and encourage the development of new, regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.*

The proposed mixed-use project contains academic space, residential space for students and faculty/staff and ground level retail. A number of temporary construction jobs as well as permanent faculty, staff, building maintenance, and retail jobs will be created. The project site is accessible to the immediate area by foot and bicycle and to the larger Los Angeles area by public transit as mentioned in Policy 3.4.1 above. The proposed project will train students for internship and permanent positions in the nearby studios and entertainment industry companies. The location of a trade school that focuses on the entertainment industry and includes a student housing component in Hollywood will facilitate an urban lifestyle which includes travel by foot, bicycle and public transit. The inclusion of residential units and guest rooms enhances urban lifestyles by placing residents within an urbanized area.

b. General Plan Framework, Housing Element

Chapter 4, Housing Element Goals: *The adopted goals of the Housing Element are:
Housing, jobs, and services in mutual proximity
Energy efficient housing*

A fundamental component of the Project is that it provides housing, jobs and academic services on a unified development site which is keeping with the Framework's stated goals. The proposed mixed-use project contains academic/administrative space, residential space for students and faculty/staff, and ground level retail. All of the student internships in the entertainment industry are expected to be located in the Hollywood and Los Angeles areas. Students typically work at an internship between 2 – 5 days per week with on-site academic classes conducted throughout the day and evening. Additionally, with respect to commercial and retail services and recreational opportunities students and faculty/staff are expected to walk to neighboring restaurant, bar and entertainment venues on weeknights and weekends.

The proposed project is targeted to achieve Silver LEED® certification, which requires the inclusion of various environmentally sensitive features, including the following:

- a double façade on the residential towers that maximizes natural lighting and simultaneously minimizes excessive heat gain;
- operable windows in the residential towers that maximize the use of natural ventilation;
- a solar hot water system;
- regional materials and certified wood;
- onsite infiltration, reducing pollution from storm water runoff;
- maximum water and energy efficient equipment such as radiant heating and cooling and low flow fixtures.

The Applicant's commitment to green technologies and measures meets the Housing Element goal of energy efficient housing and will improve the welfare of the immediate neighborhood and Hollywood community

Objective 4.2: *Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.*

The proposed mixed-use trade school is located on Sunset Boulevard and includes a residential component for the students and faculty/staff within a high-activity area and in close proximity to public transit including the Metro Red Line and several Metro Bus and Dash Lines. The portion of Sunset Boulevard to the west of the site is currently a high activity area. As the recently approved developments are constructed, the project site area will become an extension of a high activity area.

Located immediately north of a residential neighborhood that is designated for High Medium Residential development, the proposed project as designed will provide transitions to the surrounding neighborhood, including: 6,400 square foot ground level commercial space which connects commercial services that may be utilized by adjacent neighbors; a 9-foot sidewalk with a 6-foot landscaped parkway; a building façade with a bridge structure on the upper 2 levels creating a grand portal with a unique shaped-volume protruding through the portal; a 20-foot rear yard setback at the southern property line; a rear façade with two narrow towers at the east and west ends of the site and a hollow "room like" opening between the towers. The rear façade of the building includes openings at the 2nd floor Lower Terrace which extends from the 2nd floor to the 10th floor. The major opening of the rear façade is created by the Upper Terrace on the 5th floor. The Upper Terrace opening on the rear façade extends up to the 10th floor. Landscaping at the southern edge of the Lower Terrace and Upper Terrace which acts as a physical, visual and acoustical barrier to the southern edge of the building which abuts neighboring property owners; 13-foot side yard setback at the residential floors on the east side of the property which is adjacent to commercial and residential uses; trees to be planted along the ground level of the eastern property line and a portion of the southern property line to provide a visual and a sound buffer, and trees and a trellised vine to be planted along Gordon Street to provide a more appealing pedestrian experience.

c. Housing Element

Chapter 6 Objective 2.1: *Promote safety and health within neighborhoods.*

The change of use on site from a surface parking lot to the proposed mixed-use trade school will increase safety in the area by providing more eyes on the street and by placing 24-hour residency and employees at the site. The student rooms and staff/faculty apartments will be oriented primarily to Gordon Street and Tamarind Avenue with some oblique views to Sunset Boulevard from the west and east facing windows of the residential towers. Additionally, the students are expected to walk to neighboring restaurant, bar and entertainment venues, which will further increase the area's safety as more pedestrians show their presence and walk throughout the neighborhood.

Chapter 6 Objective 2.2 *Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.*

The proposed trade school includes residential, academic/administrative, and ground floor retail components on site. Housing will be created for students and resident faculty/staff, while construction jobs and permanent faculty, staff, building maintenance and retail jobs will be generated. The project site is located on Sunset Boulevard and is in close proximity to public transit as described more thoroughly in General Plan Framework Policy 3.4.1. The types of uses provided on site improves the quality of life by facilitating a reduction of vehicular trips by locating the student housing and staff faculty apartments in the same building as the academic space. Aside from walking, biking, and taking public transit, students will also have up to 22 Shared Ride cars available to them in the on-site parking garage.

By locating this mixed-use project, which includes a residential component, near major transit, job centers, shopping and entertainment areas, the proposed project will facilitate residents' interaction with the community, bringing more people onto the street, providing more customers for local businesses and increasing safety by adding "eyes on the street."

Policy 2.2.4: *Promote and facilitate a jobs/housing balance at a citywide level.*

By providing residential, academic/administrative, and ground floor retail components onsite, the proposed mixed-use project corresponds with the Housing Element's goal to offer a balance of housing and jobs within the City. Education and training for prospective employees of the arts and entertainment sectors of Hollywood on site will facilitate job acquisition and help maintain the entertainment field in the Hollywood Community Plan area. Furthermore, as the proposed project will be located in the entertainment jobs rich Hollywood Community Plan area, the students will be located within close proximity to internships. Additionally, by converting the current surface parking lot into residential and job creating uses the development will improve the jobs/housing balance citywide.

Chapter 6 Objective 2.3: *Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.*

The proposed project aims to contribute to the revitalization of the Hollywood Redevelopment Project Area by providing an example of smart-growth and urban infill development consistent with the social and physical characteristics of the Sunset Boulevard corridor. The proposed project is using sustainable practices, including a commitment to achieve LEED Silver Certification, which requires the thoughtful use of resources both during construction and throughout the operation of the building. Thus, the Applicant's commitment to green technologies and measures will improve the welfare of the immediate neighborhood and Hollywood community. (In Boston, Emerson College has already obtained LEED Certification for a new residence hall opened in 2006 and is in the process of obtaining Silver LEED Certification for the adaptive re-use of an historic office building converted to a residence hall and opening in summer 2009.

Policy 2.4.2: *Develop and implement design standards that promote quality development.*

The proposed project will invest in the area by replacing a surface parking lot with a newly constructed and boldly designed building. The aesthetically pleasing building includes good urban design principles that will improve the appearance and functionality of the area. The urban design features include the mixed-use nature of the building which combines academic/administrative spaces with student and staff/faculty housing and ground level retail. The ground level retail, with ample glazing on Sunset Boulevard is pedestrian oriented and will provide food services and small essentials. The storefront will be oriented towards Sunset Boulevard both visually and physically with an entry door on the sidewalk. By locating this mixed-use project which includes a residential component near major transit, job centers, shopping and entertainment areas, the proposed project will facilitate residents' interaction with the community, bringing more people onto the street, providing more customers for local businesses and increasing safety in the area.

d. Transportation Element

Objective 3: *Support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plans.*

The proposed project fronts onto Sunset Boulevard, a mixed-use corridor with commercial, office, retail, restaurant and entertainment related uses that contribute to the economic activity of the area. The proposed project is compatible with the Regional Center Commercial land use designation for

the proposed project.

Among the objectives of the Land Use-Transportation Policy are to:

- Focus future growth of the City around transit stations.
- Increase land use intensity in transit areas, where appropriate.
- Create a pedestrian-oriented environment in context of an enhanced urban environment.
- Accommodate mixed commercial/residential use development.
- Provide for places of employment.
- Provide a wide variety of housing for a substantial portion of the projected citywide population.
- Reduce reliance on the automobile.

Constructing a mixed-use trade school building in an urban area rich in employment opportunities, entertainment and restaurant options and public transit will meet the above stated goals of the Transportation Element. The school itself will provide employment opportunities for faculty, staff, building maintenance and for the ground level retail uses. The Emerson College students will be involved in the entertainment industry internship program. The student housing, an ancillary use to the school, will add a total of 220 students who will walk to various restaurants, entertainment venues and commercial services, thus extending the pedestrian activity to this part of Hollywood. There are various public transportation opportunities in the subject site's immediate area. The Metro Red Line Hollywood/Vine Station is located approximately 1/2 mile away from the Project Site. Additionally, the Los Angeles Metropolitan Authority (MTA) routes a number of bus lines with stops conveniently located near the subject site. Bus Line 302 provides limited stop service and runs east/west on Sunset Boulevard, connecting Union Station in downtown LA to the Pacific Palisades. The Metro Bus Line 180 bus stops are located on Vine Street with service connecting Hollywood to the South Bay Galleria. The project will also include up to 22 Shared Ride cars that will be shared by the students which will also reduce reliance on the automobile.

e. Hollywood Community Plan

Objective 1: *To further the development of Hollywood as a major center of population, employment, retail services, and entertainment, and to perpetuate its image as the international center of the motion picture industry.*

The proposed mixed-use trade school development contributes to the image of Hollywood as a center of the motion picture industry, offering courses taught by working professionals and scholars in the entertainment and communications fields, and internship opportunities spanning every aspect of the Hollywood industry, producing graduates ready for employment in the entertainment field.

Objective 2: *To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.*

Emerson College prepares graduates for employment in the entertainment industry and that specifically helps to keep employment opportunities close to the core of Hollywood, which also contributes to population growth and activities for the region.

Objective 4: *To promote the economic well being and public convenience through: a) allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards; and c) Encouraging the revitalization of the motion picture industry.*

The proposed project promotes public convenience and the renewal of an underutilized parcel of

land by proposing a mixed-use development including ground floor retail store to serve the needs of the students, faculty and staff as well as the surrounding community. The project contributes to the objective of promoting the economic well being by encouraging revitalization of the motion picture industry. The proposed development located on Sunset Boulevard is close to numerous motion picture, television and recording studio uses and related support industries within the Hollywood area. Emerson College directly serves the education and training needs of prospective employees and therefore supports and promotes Hollywood as the center of the entertainment industry. Additionally, the development of the mixed-use trade school preserves the intrusion by other uses not related to the motion picture and film industry and ensures that it supports the types of industry which are indigenous to Hollywood motion picture and television production, radio studios, sound and recording studios and film processing studios.

COMPATIBLE WITH INDUSTRIAL LAND USE POLICY

The Project Site is currently designated for Limited Manufacturing in the Hollywood Community Plan. In response to a heightened erosion of land designated for industrial land uses (in particular the conversion of industrial land to residential uses) the Department of City Planning and the Community Redevelopment Agency of the City of Los Angeles (CRA) prepared the Industrial Land Use Policy document, released on January 3, 2008. The 24-month long project re-evaluated the viability of the City's industrial districts which includes Hollywood. More specifically, the Industrial Land Use Policy document goals are as follows:

Existing properties which conformed to the four typologies were identified and are shown on the policy documents various maps and exhibits. Industrial Land Use Policy Project Geographically-Specific Directions December 2007. The Hollywood-Wilshire Industrial Area Directions map, the Hollywood-Wilshire: Analysis Area 1 map and the Hollywood-Wilshire: Analysis Area 2 map do not designate the project site as one of the four typologies. Therefore, the Industrial Land Use Policy regulations do not apply to the project site. The studios to the west, across Gordon Street, and to the east, at the corner of Sunset Boulevard and Bronson Street, are both shaded in light blue and are identified as part of the Employment Protection District. The two existing studio uses are to be protected as "retention areas" which are to maintain entertainment industry uses and in which residential uses are not deemed appropriate. The project site is therefore not subject to the recommendations listed in the Industrial Land Use Policy.

In as much as the Industrial Land Use Policy study was undertaken as a means to protect targeted industrial jobs, the Project warrants special consideration. The proposed project is compatible with the studio uses as Emerson College trains and educates students for entertainment industry internships and permanent jobs.

3. Findings for Site Plan Review

- a. *The project complies with all applicable provisions of this Code and any applicable Specific Plan*

If approved, the General Plan Amendment, Zone Change and Height District Change will bring the project into compliance with all applicable provisions of the Los Angeles Municipal Code and the Planning and Zoning Section. No Variances or Adjustments are requested as part of the Project.

The project site is not located within a Specific Plan.

- b. *The project is consistent with the General Plan*

The proposed project includes requests for a General Plan Amendment, Zone Change, Height District Change. If approved, the Zone Change and Height District Change will be consistent with the General Plan Land Use Designation.

The proposed development is in conformance with the intent and purpose of the General Plan and

will not be detrimental to the character of development in the immediate neighborhood. It is in harmony with the Hollywood Community Plan, the Housing Element, and the Transportation Element of the General Plan, all of which aim to promote mixed-use high-density developments close to public transit. Extensive findings regarding the project's compliance with the General Plan are provided within Finding No. 2.

c. *The Project is consistent with any applicable adopted Redevelopment Plan.*

The project site is located within the Hollywood Community Redevelopment Plan Area. The current CRA land use designation for the site is Limited Industrial. The proposed project fulfills many of the goals and objectives of the Hollywood Redevelopment Plan, including, but not limited to, the following:

Goal 3: *Promote a balanced community meeting the needs of residential, commercial, industrial, arts and entertainment sectors.*

The proposed project will provide a balanced development by providing housing and academic space on a unified development site. The housing component will eliminate the need to drive to the instructional spaces that have been historically housed in commercial spaces in the City of Burbank. The trade school and the retail uses will provide employment opportunities and the students will be trained for internship positions and careers in the entertainment industry.

Goal 8: *Promote and encourage the retention and expansion of all segments of the arts community and the support facilities necessary to foster the arts and attract the arts through land use and development policies such as the creation of a theater district.*

Goal 10: *Promote the development of sound residential neighborhoods through mechanisms such as land uses, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces, and other support services necessary to enable residents to live and work in Hollywood.*

The 220 student rooms (guest rooms) and the 4 staff/faculty apartments will allow the majority of the groups using the academic space to live and work or live and learn within the same building. This mixed-use development will help reduce traffic as the students will no longer drive from home to class.

d. *The project consists of an arrangement of buildings and structures (including height, bulk, and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, which is or will be compatible with existing and future development on neighboring properties.*

The proposed project includes a 10-story building with a maximum height of 132 feet. The yard setbacks provided conform to the yard setback requirements. The zero front yard setback is compatible with the overall development pattern of Sunset Boulevard, the adjacent building to the east of the project site and across Gordon Street to the west. The off-street parking satisfies the Code required parking for the various uses and provides a surplus of 52 parking spaces. The on-site lighting will be provided to maximize security and will be directed away from neighboring properties. On-site landscaping will be provided on the second floor Lower Terrace, the fifth floor Upper Terrace, the easterly side yard setback and a portion of the rear yard setback areas. The trash collection room is located within the parking garage area of the ground level. The sensitively designed project will be compatible with existing and future development on neighboring properties.

e. *The project incorporates feasible mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would substantially lessen the significant environmental effects of the project, and/or any additional findings as may be required by CEQA*

A final Environmental Impact Report (EIR) has been prepared by the Department of City Planning, as lead agency. This EIR includes mitigation measures that will minimize potential impacts on the surrounding environment. These mitigation measures have been incorporated into the project's Conditions of Approval. Additional CEQA Findings are provided in Finding No. 4.

- f. *Any project containing residential uses provides its residents with appropriate type and placement of recreational facilities and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties where appropriate.*

The proposed project includes 220 student rooms (guest rooms) and 4 staff/faculty apartment units. The project includes three outdoor areas for use by the residents. The stair court will provide spaces to sit and stand. The Lower Terrace on the second floor and the Upper Terrace on the fifth floor will provide a combination of hardscape and landscaped areas. Landscaping at the southern areas of the Lower and Upper Terraces will be designed to provide a physical, visual and sound buffer between the outdoor areas and the neighboring properties.

4. Environmental Findings

An Environmental Impact Report (EIR) has been prepared to analyze the potential environmental effects that could result from the construction and operation of the proposed project. The EIR identifies mitigation measures, monitoring measures when necessary and alternatives which would mitigate the negative environmental effects of the project. The EIR for the subject project, pursuant to and in accordance with Section 21081 of the State of California Public Resources Code, identifies potential significant impacts from the project including:

- a. Potentially significant impacts of associated with the Project that can be mitigated to Less Than Significant Levels:
- i. Aesthetics (Views, Light and Glare)
 - Potentially significant impacts during construction that may create unsightly debris and soils stockpiles, staged building materials/supplies, and construction equipment.
 - Potentially significant impacts related to new light sources such building illumination, internal illumination visible through windows.
 - Potentially significant impacts associated with new façade treatments and windows that may create daytime glare.
 - Potentially significant impacts are reduced to a level of insignificance by Mitigation Measures A-1 through A-7.
 - ii. Geology and Soils
 - Potentially significant impact with respect to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking
 - Potentially significant impacts are reduced to a level of insignificance by Mitigation Measures C-1 through C-4
 - iii. Hydrology and Water Quality
 - Potentially significant impact with respect to erosion and sedimentation during construction activities
 - Potentially significant impact with respect to standard urban use of the site
 - Potentially significant impacts are reduced to a level of insignificance by Mitigation Measures E-1 through E-21
 - iv. Land Use Planning

- Potentially significant land use compatibility impacts associated with construction-related air quality emissions, construction noise, and potential partial roadway lane and sidewalk closures would be significant and unavoidable on a temporary and intermittent basis during construction
 - Potentially significant impacts are discussed and/or mitigated in the respective Air Quality, Noise and Traffic sections of this document.
- v. Public Services (Fire, Police, Schools, Recreation and Parks, Libraries)
- Potentially significant impacts associated with police services because the project places new occupants at the development site.
 - Potentially significant impacts related to fire services during the project's construction phase were identified.
 - Potentially significant impacts associated with student walking to school during construction activities were identified.
 - Potentially significant impacts are mitigated to a level of insignificance by Mitigation measures J-1.1 through J-4.1.

Feasible mitigation measures and an associated monitoring program have been developed for all of the impacts identified in the final EIR and listed above. The City of Los Angeles finds that the requirements that have been incorporated into any future proposed project changes as mitigation as mitigation measure avoid or substantially lessen the significant environmental effects identified in the Final EIR.

- b. Potentially significant impacts of associated with the Project that cannot be mitigated to Less Than Significant Levels:

i. Air Quality

- Emissions generated onsite during construction of the Proposed Project would exceed the SCAQMD's localized significance thresholds (LSTs) for construction period emissions during the three-month grading and excavation phase. Therefore, the Proposed Project could expose sensitive receptors, such as an existing two-story residential use to the east and existing residential uses to the south of the Project Site, to substantial pollutant concentrations during the construction period and this impact would be significant and unavoidable.
- Mitigation Measures B-1 through B-8 would lessen potential air quality impacts, but not to a level of insignificance; impacts would remain significant and unavoidable.

ii. Noise

- Construction activities are expected to generate intermittent noise levels in excess of 10 dBA over ambient conditions on any one day or more than 5 dBA lasting more than 10 days during the construction process, which would be considered a significant, but temporary impact upon nearby noise sensitive properties.
- Construction activities could generate intermittent levels of groundborne vibration exceeding the 80 VdB threshold for residences and buildings where people normally sleep, which would be considered a significant but temporary impact upon nearby sensitive properties. Construction activities that would occur at the Project Site have the potential to generate low levels of groundborne vibration.
- Potentially significant noise and vibration impacts associated with construction activities would primarily affect the existing adjacent residences located to the south and east of the Project Site, and the commercial studio uses located to the west and north (identified in the Final EIR as Sensitive Receptor Nos. 1 through 6).
- Potentially significant impacts associated with special events, and the exposure of onsite residents to surrounding noise also exist, during the operational phase

- of the project, however these impacts will be mitigated to a level of insignificance through Mitigation Measures F-1 through F-14.
- Mitigation Measures F-1 through F-14 would lessen potential noise and vibration impacts, but not to a level of insignificance; impacts would remain significant and unavoidable.

iii. Traffic

- The Proposed Project has the potential to result in significant construction impacts on a temporary and intermittent basis due to temporary roadway lane closures and potential congestion resulting from utility relocations/hook-ups in the right-of-way, delivery of materials to and from the site, Project construction, and hauling activities.
- No potentially significant traffic impacts associated with the operation of the project have been identified
- Mitigation Measures K-1 through K-3 would lessen potential traffic impacts, but not to a level of insignificance; impacts would remain significant and unavoidable.

Though Mitigation Measures B-1 through B-8; F-1 through F-14; and K-1 through K-3 would lessen potentially significant environmental impacts associated with the construction of the Project, the potentially significant environmental impacts will not be mitigated to a level of insignificance as identified by the thresholds adopted by the City of Los Angeles and the South Coast Air Quality Management District. Therefore, pursuant to Section 15092 of the CEQA Guidelines, the Statement of Overriding Considerations set forth in this document identifies reasons that the City concludes that the benefits of a mixed use trade school with academic, residential and retail space on the subject site would outweigh its unavoidably significant environmental effects.

c. Cumulative Impacts

No potentially significant cumulative impacts were identified in the Final EIR

d. Mitigation and Monitoring

As discussed above, changes or alterations that will mitigate or avoid significant environmental effects have been identified in the Final EIR for the proposed project. Feasible mitigation measures and a monitoring program have been defined for identified less than significant impacts as well as significant impacts in the following areas: Aesthetics (Measures A-1 through A-7); Air Quality (Measures B-1 through B-8); Geology and Soils (Measures C-1 through C-4); Hazardous Materials (Measures D-1 through D-3); Hydrology and Water Quality (Measures E-1 through E-21); Noise (Measures F-1 through F-14); Public Utilities (Measures I-1.1 through I-4.2); Public Services (Measures J-1.1 through J-4.1); and Traffic (Measures K-1 through K-3).

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared in accordance with Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines, which require adoption of a Mitigation Monitoring and Reporting Program for all projects for which an EIR or Mitigated Negative Declaration (MND) has been prepared. Specifically, Section 21081.6 of the Public Resources Code states: "the [lead] agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that program]... shall be designed to ensure compliance during project implementation." The City of Los Angeles is the lead agency for the proposed project.

The MMRP describes the procedures for the implementation of all of the mitigation measures identified in the EIR for a future proposed project. It is the intent of the MMRP to: (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify

monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes where feasible.

The MMRP lists mitigation measures according to the same numbering system contained in the Draft EIR sections. Each mitigation measure is categorized by topic, with an accompanying discussion of the following:

- The phase of the project during which the mitigation measures should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);
- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure); and
- The monitoring agency (i.e., the agency to which mitigation reports involving feasibility, compliance, implementation, and development operation are made).

The site developer shall be obligated to demonstrate compliance with the required mitigation measures. The entity responsible for the implementation of all mitigation measures shall be the site developer unless otherwise noted.

e. Statement of Overriding Considerations

California Public Resources Code §21081(b) prohibits approval of a project with significant, unmitigable adverse impacts resulting from infeasible mitigation measures or alternatives unless the agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment. The project could have significant, unmitigable, adverse impacts, as described above. However, the City finds that those impacts are outweighed by the following specific overriding economic, legal, social, technological, or other benefits of the project. The City, having considered all of the foregoing, finds that the following specific overriding economic, legal, social, technological, or other benefits of the project outweigh the aforesaid significant, unmitigable effects on the environment. The City expressly finds that the following benefits would be sufficient to reach this conclusion:

- i. Development of the Emerson Project Site will improve social and economic conditions in the project area by providing short term and long term jobs at the project site as well as job training in an industry that is of substantial importance to the Hollywood community and the City of Los Angeles. Approximately 670 short-term construction jobs are anticipated during the project construction phase, in addition to 22 permanent full time jobs at the school campus are anticipated. Additionally, the campus will provide specialized trade training in entertainment industry fields to 220 students each academic term.
- ii. Development of the Emerson Project Site will improve the built environment in the area by replacing a blighted surface parking lot with a productive mixed-use structure. The proposed structure, which is innovatively and uniquely designed, will serve both as a visual focal point in the area as well as a monumental gateway to Hollywood to travelers entering Hollywood from the east.
- iii. Development of the Emerson Project Site will contribute to the logical development of entertainment related and supporting uses within the Hollywood area. The project site will provide training for 220 students in entertainment related vocations each academic term and will place students in internships throughout Hollywood and Los Angeles.

- iv. Development of the Emerson Project Site provides for a mixed-use campus that combines residential and academic space on a unified development site. The mixed-use nature of the campus reduces vehicular trips that would otherwise be associated with off-campus residency.
- v. Development of the Emerson Project Site places students and faculty in an area that is well served by transit (a Metro Red Line subway and several bus lines provide access within ½ mile of the project site) and by existing recreational, entertainment and retail amenities within the immediate area.
- vi. Development of the Emerson Project Site will promote various policies of the City's General Plan by providing a project that is well served by transit amenities, is designed with ecological sensitivity and that facilitates and synergizes with desired entertainment industry land uses in the area.

f. Alternatives

Pursuant to CEQA, the EIR assessed a reasonable range of alternatives to the project action or location (Section 15126.6). The discussion focuses on opportunities for eliminating any significant adverse environmental effects, or reducing them to a level of less than significant "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly..." (Section 15126.6(b)). The discussion of alternatives is governed by the "rule of reason."

The EIR evaluated two alternatives to the proposed project; a No-Build alternative and a By-Right alternative.

i. No-Build Alternative

The Project Site is presently used as a surface parking lot with approximately 128 parking spaces. The parking spaces are currently leased to Sunset Studios Holdings, LLC (from which Emerson College purchased the Project Site) for the use of KTLA studios on a temporary basis. These spaces are not available to the general public and, at the time the NOP was circulated, the Project Site was vacant and not being used by the KTLA Studios or any other occupant. Under the No Project Alternative, it is assumed that the existing surface parking lot would remain on site, but would not be in operation for the foreseeable future.

The No Project Alternative would reduce several environmental impacts as compared to the Proposed Project. The Proposed Project is anticipated to result in significant unavoidable impacts in the following issue areas: Air Quality (Construction), Noise & Vibration (Construction), and Noise (Exterior Operational Land Use Compatibility Standards). The No Project Alternative would reduce all of these significant and unavoidable impacts to levels of insignificance.

However, the No Project Alternative fails to meet any of the Project Objectives. For instance, the No Project Alternative would not contribute to the revitalization of the Hollywood Redevelopment Project area by providing an example of "smart-growth" infill development consisting of an entertainment based academic facility with student housing which complements and supports the surrounding entertainment related land uses in Hollywood. The No Project Alternative would also fail to accomplish several important Proposed Project objectives, including: to provide ground floor retail space in a manner that is complimentary to the proposed and existing land uses in the neighborhood; to promote a safe pedestrian-oriented environment by providing a sidewalk and streetscape amenities, and ground floor retail space along both Sunset Boulevard and Gordon Street; to provide a viable project that promotes the City's economic well-being by increasing student internship

opportunities in the entertainment industry; to accommodate faculty/staff apartment residences on-site to ensure the safety and professional oversight of student residents enrolled in the Los Angeles Program; to support traffic reduction transportation policies by providing student housing and internship opportunities in close proximity to studio and entertainment uses and regional transit stations; and to provide a high-performance and environmentally efficient mixed-use project with the intent to achieve the equivalent of LEED certification at the Silver Level, pursuant to the City's Green Building Ordinance.

ii. By-Right Alternative

This Alternative was selected as a possible scenario for future development of the Project Site consistent with existing General Plan land use and zoning designations. The objective of this Alternative is to define a project that is as close as possible to a "By-Right Development" that could be developed without any specific variances, deviations or special discretionary approvals from the CRA or Department of City Planning. It should be noted that this alternative presents a theoretical development scenario from a planning and land use perspective. This alternative, however, does not take into consideration the financial feasibility of construction and development.

By-Right Development Alternative development would include a maximum of approximately 56,026.5 square feet of floor area on the Project Site (37,351 square-feet with an FAR of 1.5:1). For purposes of this analysis, it is estimated that the By-Right Development Alternative would include approximately 48,027 sf of academic/administrative space and approximately 8,000 sf of ground floor retail.

It is assumed that parking would be provided on two levels, one of which would be at grade and the other of which would be provided in a subterranean parking level beneath the entire Project Site. Pursuant to LAMC 12.21 A.4. (x)(3), a total of 112 parking spaces would be required, approximately 56 spaces provided per level.

With respect to scale and massing of the proposed Alternative development, the C4-zoned area would be developed with an approximate five-story building on top of ground floor retail. As the By-Right Development Alternative would be consistent with the underlying zoning regulations, it would be compatible with the existing mid-rise residential buildings along Gordon Street. Overall, in comparison to the Proposed Project, this Alternative would be a smaller structure with reduced scale and massing.

The By-Right Development Project Alternative would not reduce any of the identified significant and unavoidable impacts disclosed for the Proposed Project, and Air Quality (Construction), Noise & Vibration (Construction), and Noise (Exterior Operational Land Use Compatibility Standards) would remain significant under this alternative. While the By-Right Development Alternative would result in a shorter construction period, the construction activities involved with site clearing, excavation and building would be nearly identical to that which would occur under the Proposed Project. On a day-to-day basis, the noise levels, construction traffic trips, and air quality emissions would be the same.

With respect to project operations, the By-Right Development Alternative would not include on-site student or faculty rooms and therefore result in increased A.M. and P.M. traffic trips, as well as increased daily trips. As such, this Alternative would also result in increased air quality emissions and noise levels associated with vehicle use.

The By-Right Development Alternative would also fail to meet some of the Project Objectives. For instance, the By-Right Development Project Alternative would not contribute to the revitalization of the Hollywood Redevelopment Project area by providing an example of "smart-growth" infill development consisting of an entertainment based academic facility with student housing which complements and supports the surrounding entertainment related land uses in Hollywood. This Alternative would not accommodate faculty/staff

apartment residences on-site to ensure the safety and professional oversight of student residents enrolled in the Los Angeles Program; and, it would fail to support traffic reduction transportation policies by providing student housing and internship opportunities in close proximity to studio and entertainment uses and regional transit stations.

The City finds that the considerations discussed above make the alternatives identified in the final EIR either infeasible or less desirable than the proposed project, which would best meet the City's identified planning objectives and provide for the greatest number of housing and job opportunities on-site. Moreover, it should be recognized that adoption of the subject EIR would not preclude a future developer from proposing a less intense development on the project site than what was considered in the final EIR.

g. Other CEQA Considerations

Pursuant to the California Environmental Quality Act ("CEQA," Public Resources Code section 21000 et seq.), the City of Los Angeles has acted as the lead agency for the project and prepared a Final Environmental Impact Report under CEQA to analyze the potentially significant environmental impacts of the future Project. The City, acting as lead agency, distributed a Notice of Preparation ("NOP") of the Environmental Impact Report ("EIR") for the Project to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties for their review from April 30th, 2009 to June 1st 2009. A public Scoping Meeting was held on May 13th. The City issued a revised and re-circulated NOP from August 31st 2009 to September 30th 2009. The Draft EIR was released for a 45 day review period on October 8th 2009 to November 23rd 2009. The Notice of Completion and Availability for the Final EIR was issued February 5, 2010.

Upon the close public review period, written responses were prepared to comments received on the Draft EIR, and those comments and responses, together with a list of persons commenting, were included within a Final EIR prepared pursuant to said applicable state statutes and City CEQA guidelines for the Project.

The City Planning Commission is a responsible agency under the CEQA Guidelines and is required to make findings as required by CEQA with respect to its certification of the subject EIR. The City Planning Commission has reviewed and considered the information contained in the FEIR for the Project and other documents in the record with respect to the anticipated Project and certifies that its decision on the Project reflects its independent judgment. The City Planning Commission further determines that:

- i. it has considered, pursuant to the CEQA Guidelines Section 15096 all relevant evidence in the record, including but not limited to the Final EIR;
- ii. it has considered the environmental effects of the Project as set forth in the Final EIR, pursuant to CEQA Guidelines Section 15096(f) and adopts the CEQA findings;
- iii. it finds, pursuant to CEQA Guidelines Section 15091(a)(1) that mitigation measures have been required and incorporated into the Project which avoid or substantially lessen the significant environmental effects as identified in the Final EIR;
- iv. it finds, pursuant to CEQA Guidelines Section 15093, that certain economic, legal, social, technological, or other benefits of the Project, as set forth above, outweigh the unavoidable adverse environmental effects, all of which are identified in the Final EIR;
- v. it finds, pursuant to CEQA Guidelines Section 15096(g)(2), that there are no feasible alternatives or feasible mitigation measures that would substantially lessen or avoid any significant environmental effect of the Project as identified in the Final EIR; and

vi. it hereby finds that the Final EIR is adequate under CEQA for approval of the Project.

The City Planning Commission hereby adopts the findings and statement of overriding considerations and adopts the Mitigation Monitoring and Reporting Program for the anticipated Project.

RESOLUTION

WHEREAS the subject property is an approximately 0.86 acre parcel located at 5960 W Sunset Boulevard 5950 W. Sunset Boulevard and 1460 N. Gordon Street, within the area covered by the Hollywood Community Plan, adopted by the City Council on December 13, 1988; and

WHEREAS the project also involves an 0.58 acre collection of parcels located at 5936-5946 N Sunset Boulevard, 1459-1467 N Tamarind Avenue and 1456 N Gordon Street that comprise an Add Area; and

WHEREAS the property owner requested a Zone Change and Height District change for the subject privately owned property from [Q]C4-1 to (T)[Q]C4-2D to eliminate the [Q] Condition which prohibits residential uses (Ord. No. 165,652) and establish (T) Tentative Classifications and [Q] Qualified Conditions pursuant to this project's Conditions of Approval and to allow for a 3.1:1 Floor Area Ratio with no limitation as to height, with a corresponding General Plan Amendment to redesignate the property from Limited Manufacturing to Regional Center Commercial within the Hollywood Community Plan; and

WHEREAS the property owner intends to build and use a new 10-story mixed-use trade school building with a total of approximately 115,000 square feet of floor area, containing 220 student guest rooms, 4 faculty/staff apartments, 38,100 square feet of academic/administrative space, and approximately 6,400 square feet of ground floor retail space.

WHEREAS the City Planning Commission at its meeting of May 27, 2010 approved the requested General Plan Amendment from Limited Manufacturing to Regional Center Commercial for the subject property and Add Area, and approved the requested Zone Change and Height District Change from [Q]C4-1 to (T)[Q]C4-2D for the subject property; and

WHEREAS pursuant to the provisions of City Charter the Mayor and the City Planning Commission have transmitted their recommendations; and

WHEREAS the requested General Plan Amendment is consistent with the intent and purposes of the Hollywood Community Plan to designate land use in an orderly and unified matter; and

WHEREAS the Regional Center Commercial land use designation and the (T)[Q]C4-2D zone and height district will allow the project, described above, which is consistent with the Plan and Zone; and

WHEREAS the project has an Environmental Impact Report (ENV-2009-0469-EIR); a Mitigation Monitoring and Reporting Program and a Statement of Overriding Consideration in accordance with the City's guidelines for implementation of the California Environmental Quality Act.

NOW THEREFORE BE IT RESOLVED that the Hollywood Community Plan be amended as shown on the attached General Plan Amendment Map.

Executive Summary

INTRODUCTION

The General Plan Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements. The Element responds to State and Federal mandates to plan for the future. In planning for the future, the City of Los Angeles is using population forecasts provided by the Southern California Association of Governments (SCAG). The Framework Element does not mandate or encourage growth. Because population forecasts are estimates about the future and not an exact science, it is possible that population growth as estimated may not occur: it may be less or it may be more. The City could be at the beginning of a long decline in population or at the beginning of a sharp increase.

The Element is based on the population forecasts provided by SCAG. Should the City continue to grow, the Element provides a means for accommodating new population and employment in a manner which enhances rather than degrades the environment. The City does not have the option of stopping growth and sending it elsewhere. It must prepare for it, should growth occur. In preparing the General Plan Framework Element, the City has answered the question "What would the City do if it had to accommodate this many more people?" In answer to that question there are two possibilities: 1) prepare a Plan to accommodate density equally among all City neighborhoods, or 2) prepare a plan to preserve the single-family neighborhoods and focus density -- should it occur -- in limited areas linked to infrastructure.

A plan to spread growth among all neighborhoods negatively affects all single-family neighborhoods equally, and continues strip commercial development patterns without respect to available infrastructure and transportation facilities. A plan to focus growth preserves single-family and low density neighborhoods and affords a closer relationship with available infrastructure.

The Framework Element refines adopted City policy and is intended to update Concept Los Angeles. The central theme of Concept Los Angeles was to preserve single-family neighborhoods by focusing any growth away from them and into centers. While planning for the future is demanding and challenging for the City, it is clear that given the choices about how best to respond to the mandates to plan for growth, the Framework Element is clearly the better alternative.

GENERAL PLAN FRAMEWORK ELEMENT AND ITS RELATIONSHIP TO THE CITY OF LOS ANGELES GENERAL PLAN

The Framework Element supersedes Concept Los Angeles and the Plan citywide elements of the City of Los Angeles General Plan, and sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. In many respects, the Framework Element is an evolution of the Centers Concept, adopted in 1974, that provides fundamental guidance regarding the City's future. The City of Los Angeles is a city of cultural and natural diversity: its communities reflect a variety of people, while its environment reflects a variety of natural features ranging from mountains and hills to rivers, wetlands and coastal areas. This Element contains policies that are intended to maintain this diversity.

While the Framework Element incorporates a diagram that depicts the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, it does not convey or affect entitlements for any property. Specific land use designations are determined by the community plans. The Framework Element provides guidelines for future updates of the City's community plans. It does not supersede the more detailed community and specific plans.

State Requirements

California State law (Government Code Section 65300) requires that each city prepare and adopt a comprehensive, long-term general plan for its future development. This Element must contain seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions.

In fulfillment of the State's requirements, the City's general plan contains citywide elements for all topics except Land Use for which community plans establish policy and standards for each of the 35 geographic areas. As optional elements, the City has adopted Air Quality and Service Systems Elements.

California State law requires that the day-to-day decisions of a city follow logically from and be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5 and 656474 require that zoning ordinances and subdivision and parcel map approvals be consistent with the general plan.

Scope of the General Plan Framework Element

The General Plan Framework Element defines citywide policies that influence most of the City's General Plan Elements. It includes policies for:

1. Land Use
2. Housing
3. Urban Form and Neighborhood Design
4. Open Space and Conservation
5. Economic Development
6. Transportation
7. Infrastructure and Public Services

PREPARATION OF THE GENERAL PLAN FRAMEWORK ELEMENT

Over a period of several years, the Departments of City Planning and Transportation, in collaboration with a team of professional consultants, outside organizations, and residents from all parts of the City, developed the Proposed Framework Element. The primary means was approximately 60 community and neighborhood workshops, at which more than 3,000 residents and business persons participated.

IMPLEMENTATION OF THE GENERAL PLAN FRAMEWORK ELEMENT

Implementation of the General Plan Framework Element will be achieved through plans, ordinances, standards and guidelines, studies, capital improvements, economic development procedures, administrative procedures, and coordination with other governmental agencies, coordination and joint partnerships with private landowners and developers, and development review procedures. Many of the Element's policies will be implemented by the revision of the community plans and the Municipal Code, which is the basic mechanism through which the City regulates the use and development of land. The full-text Element specifies the implementation programs associated with each Framework Element policy.

OVERVIEW OF THE GENERAL PLAN FRAMEWORK ELEMENT

The following sections present an overview of the principal Framework Element policies. Some policies have been paraphrased for the purposes of brevity. Refer to the full-text chapters for the complete text.

Basis for Planning: Growth and Capacity

The General Plan Framework Element is based on a planning horizon for population and employment growth: that the City's population could increase by approximately 820,000 residents and employment by approximately 390,000 jobs. The City is not promoting this population growth. Rather, pursuant to conformity requirements, it has developed this Element to establish policies to best accommodate this growth when and if it should occur. The population estimate is the growth forecast for 2010 for the City of Los Angeles provided by the Southern California Association of Governments (SCAG) (June, 1993). The employment increase goal doubles the SCAG 2010 forecast to maintain the City's 1990 jobs-housing ratio. While the SCAG employment forecast represents the prevailing trend in economic activity, the higher number is considered essential if the City is to have sufficient job opportunities for its residents and to maintain and improve the level of services for the City's future. Without changes in the current State taxation and revenue distribution laws, lesser employment growth would significantly and adversely impact the City's fiscal stability and the quality of City services.

The population and employment estimates represent a "step" in the City's future that can rationally be used for the planning and funding of supporting transportation, utility infrastructure, and services. Though the Framework Element's Land Use Diagram could accommodate higher levels of growth, these would not be achieved in the foreseeable future as determined by the Framework Element's economic analyses.

At the same time, the population and employment estimates do not represent maximum or minimum levels of growth to be permitted. A system for the annual monitoring of growth, infrastructure, and services, used as the basis to guide future capital investments and development decisions, will also be used as a mechanism to gauge the appropriateness of the estimates and provide for their modification over time.

The City is not promoting this population growth. Rather, pursuant to conformity requirements, it has developed this Element to establish policies to best accommodate this growth when and if it should occur.

Principal Framework Element Policies

Land Use

The primary objectives of the policies in the Framework Element's Land Use chapter are to support the viability of the City's residential neighborhoods and commercial districts, and, when growth occurs, to encourage sustainable growth in a number of higher-intensity commercial and mixed-use districts, centers and boulevards and industrial districts particularly in proximity to transportation corridors and transit stations.

The Framework Element establishes new land use categories whose specific locations are determined through the community plans. In general, these categories continue the residential and industrial designations that have been used in the past. New categories are recommended for selected areas of the City that, in general, have been previously designated for commercial uses. These include:

Neighborhood District

These are pedestrian-oriented retail focal points for surrounding residential neighborhoods (15,000 to 20,000 persons) containing a diversity of local-serving uses. Generally, these districts are at a floor area ratio of 1.5:1 or less and are characterized by buildings of one- and two-stories in height, both to be determined by the community plans.

Community Centers

Generally, these are the "downtowns" that serve Los Angeles' communities (25,000 to 100,000 persons). They contain a diversity of uses such as small retail and offices, entertainment, public facilities, and neighborhood oriented uses. In many areas, an emphasis is placed on the development of projects that integrate housing with the commercial uses. The Centers may contain one or more transportation hubs. Generally, Community Centers range from floor area ratios of 1.5:1 to 3.0:1. Heights are generally characterized by two- to six-story buildings, depending on the scale of the area. Floor area ratio and any specific height restrictions would be determined in the community plan.

Regional Centers

These serve as the focal points of regional commerce, identity, and activity for a population of 250,000 to 500,000 persons. Generally, they include corporate professional offices, concentrations of entertainment and cultural facilities, and mixed-use developments. Some contain region-serving retail facilities. Typically, Regional Centers are higher-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. This category is generally characterized by six- to twenty-story buildings or higher. Floor area ratios and any specific height restrictions would be determined by the community plan.

Downtown Center

Downtown Los Angeles is the principal government and business center of the region, with a worldwide market. It is the highest-density center of the City and hub of regional transportation.

Mixed-Use Boulevards

Boulevards connect the City's Neighborhood Districts, Community and Regional Centers, and Downtown. Mixed-use is encouraged along some of these boulevards, with the exact boundaries identified in the community plan. Generally, different types of Mixed-Use Boulevards will fall within a range of floor area ratios from 1.5:1 up to 4:1 and will be characterized by one- to two-story commercial structures up to three- to six-story mixed-use buildings between centers. Mixed-Use boulevards are served by a variety of transportation facilities.

Mixed-use can take three forms: housing above commercial, housing side-by-side with commercial, and/or alternating blocks of housing and commercial. Flexibility affords community choice in determining appropriate mixed-use to be identified in the community plan.

Industrial Districts

Lands designated for industrial use by the community plans continue to be designated for these purposes to support economic development and jobs generation. Some limited flexibility is allowed to promote recycling when appropriate.

Housing

The Framework Element elaborates on the City's adopted Housing Element to ensure the provision of housing for the City's existing and future residents. Among the key policies are the following:

Provide sufficient lands for the development of an adequate supply of housing units. The Framework Element proposes the expansion of the City's capacity for housing units by the provision of bonus densities for the integration of housing with commercial uses in districts, centers, and boulevards.

Provide incentives for:

- The scattering of affordable units throughout the City.
- Development of family-size units in multi-family developments.
- Expedited permit processing for affordable units.

Establish development standards for new multi-family residential projects to provide for liveable communities.

Revise, as necessary, community plans to facilitate the conservation of the scale and character of existing stable residential neighborhoods.

Plan for appropriate increases in housing production in appropriate areas as determined through the community plans and implementing actions in conformance with the California Environmental Quality Act (CEQA).

Urban Form and Neighborhood Design

The Urban Form and Neighborhood Design Chapter defines "urban form" as (a) the "general pattern of building height and development intensity" and (b) the "structural elements" that define the City physically, such as natural

features, transportation corridors (including the planned fixed rail transit system), open space, public facilities, as well as activity centers and focal elements. The chapter describes options to improve community and neighborhood liveability.

Establish local development standards through community plan amendments.

Visually differentiate the districts, centers, and boulevards that comprise Los Angeles.

- Neighborhood Districts: low-rise and pedestrian-oriented.
- Community Centers: mid-rise; largely pedestrian-oriented.
- Regional Centers: high-rise; some containing clusters of buildings on sidewalks and pedestrian areas and others with freestanding buildings.
- Mixed-Use Boulevards: comparable to the Neighborhood Districts and Community Centers.

Define streets according to their function and user character, including "pedestrian priority segments," "transit priority segments," and "vehicle priority segments."

Formulate development standards and guidelines that raise the quality of development citywide to enhance rather than adversely impact neighborhood character (e.g., multi-family residential).

Provide for elements that enhance neighborhood character, including the use of street trees and "slowing" of residential streets.

Establish standards to enhance pedestrian activity in areas to be designated by the community plans as pedestrian districts including the siting of buildings along sidewalks, design of the ground elevation of buildings to promote visual interest to the pedestrian, locating parking to the rear or other areas away from the primary pedestrian area, and inclusion of streetscape amenities.

Open Space and Conservation

The Framework Element's open space and conservation objectives are oriented around the conservation of significant resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Key policies include the following:

Establish a linear open space and greenway system that connects the City's regional open spaces (mountains, coastline, and parks) and is linked to communities and neighborhoods. This may consist of improvements along the Los Angeles River, other drainages, transit corridors, and utility corridors, where appropriate. Bikeways, hiking trails, parks, and passive open space are among the improvements that may be considered.

Consider open space as an integral ingredient of neighborhood character.

Encourage sustainable urban forest management programs to conserve and manage open space and identify new opportunities for demand side management of the urban watershed.

Consider appropriate methods to protect significant remaining major open spaces, including hillsides and

undeveloped areas.

Consider urban forms of open space, such as small parks, pedestrian districts, community plazas, and similar elements.

Promote the joint use of open space with public facilities (schools, transit, and other).

Open spaces that constitute a major risk to life and property should be preserved or regulated (e.g., steep terrain, landslide areas, and flood plains).

Develop a sustainable systems approach to public infrastructure planning, construction, and management that identifies opportunities to reduce long-term cost to taxpayers of such activity.

Economic Development

The Framework Element's economic development policies are designed to facilitate job growth by emphasizing that Los Angeles plays a proactive role in the retention and attraction of businesses in order to have a sufficient job base to maintain and enhance the quality of life. Key policies include the following:

Reorganize local government to coordinate economic development and business support services functions.

Establish a comprehensive program for business retention and attraction, including the marketing of the City to emerging industries.

Develop an infrastructure investment strategy to support population and employment growth areas.

Identify Federal and State mandates that may constrain business activity in Los Angeles, and address these through appropriate lobbying efforts.

Provide sufficient land to support economic development activities.

Concentrate commercial and office development in centers, corridors, and in proximity to transit stations.

Retain current industrial land use classifications to provide adequate quantities of land for emerging industrial sectors, except where such lands are unsuitable for such purposes.

Broaden the definition of industrial uses through the active investigation of their changing nature as effected by small company formation and the introduction of information age technology.

Establish incentives for industrial development in areas adjacent to the Port of Los Angeles, the rail corridor bisecting the San Fernando Valley, and the South Central/Southeast industrial area.

Facilitate the operations of the Port of Los Angeles and the Los Angeles International Airport as major drivers of the local and regional economy, supporting planned expansion and modernization.

Retain the City's existing employment base through an outreach program to existing businesses and an ongoing

assessment of their specific land use requirements.

Improve the movement of goods and workers to industrial areas.

Develop and maintain streamlined approval processes and reduce uncertainty for the developers and the community.

Maintain development fee structures that do not unreasonably burden economic development activities.

Promote the re-use and recycling of deteriorated commercial and industrial districts.

Expand job training programs to adequately address the skill requirements of emerging industries.

Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and job training opportunities.

Support efforts to develop industry and job markets in the area of resource conservation and demand side management.

Transportation

The primary goals of the Transportation Chapter are to provide adequate accessibility to commerce, to work opportunities, and to essential services, and to maintain acceptable levels of mobility of all those who live, work, travel, or move goods in Los Angeles. Attainment of this goal necessitates a comprehensive program of physical infrastructure improvements, traffic systems management techniques, and behavioral changes that reduce vehicle trips. These are linked to an integrated hierarchy of movement modes that encompasses the pedestrian, bicycle, automobile, local shuttle, bus, and rail transit. Key policies include the following:

Neighborhood Transportation

Expand neighborhood transportation services and programs to enhance neighborhood accessibility, including such systems as DASH, taxis, transit, paratransit, voucher programs, incentives for recreational trips, and "Smart Shuttles" and jitneys.

Transportation Demand Management

Participate in regionwide Transportation Demand Management programs and Transportation Control Measures to help achieve regional trip reduction and/or vehicle occupancy rate increases.

Promote the development of transportation facilities and services and educational programs that encourage transit ridership, increase vehicle occupancy, and pedestrian and bicycle access.

Provide park-and-ride shuttle services to and special events.

Encourage businesses to implement tele commuting programs, flexible work schedules, and teleconferencing programs.

Support completion of the Los Angeles County Metropolitan Transportation Authority baseline rail transit system by 2010 and establish priority corridors to continue transit development beyond 2010.

Increase bus service along high-demand routes and corridors.

Initiate shuttle bus programs to serve transit stations.

Continue transit restructuring studies to reduce the cost and enhance the effectiveness of transit service.

Transportation Systems Management and Parking

Establish priority corridors for Transportation System Management improvements, including Automated Traffic Surveillance and Control systems, Smart Corridors, and other strategies.

Establish a Plan for high-occupancy vehicles on City arterials.

Implement shared parking, peripheral parking, and parking-pricing strategies in high employment areas.

Highway Infrastructure

Establish priority corridors for highway capital improvements, with an emphasis on severely congested corridors.

Continue completion of the City's Highways and Freeways Plan.

Centers, Districts, and Mixed-Use Boulevards

Streamline traffic analysis and mitigation procedures and use flexible standards to facilitate development in the centers, mixed-use boulevards, and in proximity to transit stations.

Develop transit alignments and station locations that maximize transit service in centers and mixed-use boulevards.

Provide shuttles and other services that increase access to and within centers and mixed-use boulevards.

Develop new and/or redefined parking policy procedures in centers and mixed-use boulevards, including the provision of shared parking facilities.

Enhance pedestrian circulation and bicycle access to centers and mixed-use boulevards.

Preservation of Neighborhoods

Protect residential neighborhoods from the intrusion of additional traffic generated by new regional or local development.

Movement of Goods and Services

Support the development of the Alameda Corridor and other transportation projects that serve industrial and commercial uses.

Complete the LAX Master Plan and support the continued growth of the Port of Los Angeles.

Establish ground access plans that facilitate the future growth of Van Nuys Airport, Palmdale Regional Airport, and Ontario International Airport.

Continue to expand the role of Union Station as the major regional hub for Amtrak, Metrolink, Metrorail, and, in the future, high-speed rail service.

Financing of Transportation Programs

Seek adequate funding for Transportation improvements and programs, including State and Federal and new sources (e.g., congestion pricing, user fees, assessment districts, private sector financing/partnerships, bond measures, and other).

Encourage the participation of small business enterprises in implementing new transportation projects.

Street Maintenance

Identify streets and sidewalks requiring remedial repair and implement improvements to prolong their useful life.

Infrastructure and Public Services

The goals, objectives, and policies found within this chapter address the following systems and services:

1. Wastewater
2. Stormwater
3. Water
4. Solid Waste
5. Police
6. Fire
7. Libraries
8. Parks
9. Power
10. Schools
11. Telecommunications
12. Street Lighting
13. Urban Forest

For each of the public services and infrastructure systems, four basic policies are defined by the Framework Element:

Monitor levels of demand and the abilities of the service/infrastructure system to support demands. Use these demands to forecast future needs and improvements.

Maintain an adequate system/service to support the needs of population and employment. This encompasses the upgrade and replacement of existing facilities as they deteriorate as well as the expansion of facilities/services to accommodate growth.

Implement techniques that reduce demands on utility infrastructure or services, where appropriate. Generally, these encompass a variety of conservation programs (e.g., reduced liquid and solid wastes and energy use, increased site permeability, watershed management, telecommunications, and others).

Establish procedures for the maintenance or restoration of service after an emergency, including earthquakes.

Major changes have begun to occur in the field of information technology. While addressed in the Framework Element, it is important for the City to account for how these advances in communication technology will affect its planning efforts.

Implementation Programs

A diversity of programs are specified to implement the General Plan Framework Element's policies. Their timing is contingent on the availability of adequate funding. Key programs include the following:

Establish a program to monitor growth and public service and infrastructure demands and capacities.

Prepare and submit to the City Council an Annual Report on Growth and Infrastructure, based on information compiled by the monitoring program.

Amend the community plans and the zoning ordinance (Municipal Code), guided by the Framework Element's policies and standards.

Establish development standards to create a higher quality of development.

Formulate Transportation Improvement and Mitigation Plans for community plan areas and geographic groupings of districts centers and mixed-use boulevards.

Formulate master and financing plans for public services and infrastructure that are correlated with forecast population and employment growth.

Maintain and implement Capital Improvement Programs that consider, as a priority, the improvements as an incentive for development in industrial and targeted growth areas.

Establish and implement a comprehensive economic development strategy and a proactive business attraction

and retention program.

Coordinate actions to mitigate regional transportation and air quality impacts with adjacent cities and regional agencies (SCAG, SCAQMD, and other).

Establish procedures for City agencies to coordinate the provision of services and infrastructure to support growth.

Establish master plans for infrastructure and public services to upgrade existing deficiencies and meet the needs of future growth.

Initiate procedures to streamline and provide certainty for the development review process, emphasizing the facilitation of projects that are consistent with the objectives and policies of the General Plan Framework Element, and the implementation of community plans and zoning regulations.

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Chapter 2

Growth and Capacity

INTRODUCTION

The General Plan Framework Element establishes a vision for the long-term development and physical form and character of the City of Los Angeles. This vision is expressed through a land use diagram (refer to Chapter 3) that will be refined and implemented through amendments to the community plans. The evolution of the City will take time to achieve due to the City's size and rates of growth.

Realistically, the planning and funding of most infrastructure facilities and public services that support growth must be for levels of growth that can reasonably be expected to occur within a shorter time frame than could be accommodated by the long-term vision. Many of the City's short-term capital improvements are defined through a five-year plan that is updated annually (the Capital Improvements Plan). Major improvements that serve large areas of the City and/or are capital intensive, such as schools and fixed rail transit facilities, are planned and funded over an extended period (10 years or more). Some, such as wastewater treatment facilities, are planned to accommodate growth for periods in excess of 50 years.

Consequently, the General Plan Framework Element plans for a level of population and employment growth that may be reasonably anticipated in the near-term as the basis of its policies and programs and for environmental review in accordance with the California Environmental Quality Act (CEQA). The General Plan Framework Element is population growth neutral: it is not the intent of the Framework Element to cause any specific level of population growth to occur. It is a plan to accommodate whatever growth does occur in the future, which could include loss of population. The year 2010 is used as the planning "horizon" to facilitate comparability with the regional growth forecasts of the Southern California Association of Governments (SCAG). The SCAG population and household forecasts for the City of Los Angeles for the year 2010 (as defined in June, 1993 - SCAG population forecasts for the City are currently being revised.) are used in the Framework Element. Employment forecasts have been adjusted to maintain the City's existing jobs-housing ratio, which is considered important in maintaining the City's fiscal stability.

The estimates are not intended to represent maximum or minimum levels of development to be permitted. Rather, they will be monitored annually as a basis for the implementation of infrastructure and services to support growth (as subsequently described). Based on the monitoring, the "horizon" may be adjusted to reflect the actual levels of growth and their impacts and demands on infrastructure and public services. At a minimum, the "horizon" must be reviewed and updated as the population and employment forecasts and/or 2010 are approached. Adjustments of the population and employment "horizon" may necessitate additional environmental review.

The "horizon" will guide the revision of all components of the City's general plan (e.g., community plans and citywide elements) and guide planning policy by the City's departments and commissions.

EXISTING GENERAL PLAN

Los Angeles' existing general plan is an end-state plan with no shorter term population, housing and employment policy goals established prior to the ultimate buildout of the Plan. The theoretical capacities of the existing general plan at buildout, as shown in the Framework Element technical reports and Environmental Impact Report, are adequate to accommodate growth to the year 2010. While its housing

capacity is more constrained than commercial and industrial uses, the Plan's capacity for growth considerably exceeds any realistic market requirements for the future. For example, there is sufficient capacity for retail and office commercial uses for over 100 years even at optimistic, pre-recession, market growth rates. At the same time, the impact assessments of the current general plan indicate that if all lands were to be developed with the uses at the maximum densities permitted, an unrealistic jobs/housing relationship would result and supporting infrastructure and public services would be unable to support this level of growth.

SCAG 2010 MARKET FORECAST

SCAG has forecasted population, household, and employment levels for the year 2010 and provided this information to all jurisdictions in the region for transportation planning applications. State and Federal regulations require that local plans be consistent with the Regional Air Quality Plan and the Regional Mobility Plan. The Framework Element is required to utilize the population forecasts provided by SCAG. The Element reflects the SCAG population and household forecasts as its planning horizon. It sets a higher *goal* for employment -- to improve employment opportunities for City residents and to help maintain a stable fiscal base which in turn supports public services. Table 2-1 summarizes these numbers (estimates are rounded):

Table 2-1

	1990	SCAG 2010 Forecast (June, 1993)	Framework Plan 2010
Population	3,485,399	4,306,500	4,306,500
Employment	1,902,067	2,112,500	2,291,500
Households	1,299,963	1,566,000	1,566,000

SCAG's population forecast assumes that about two thirds of the increase will be accounted for by natural increases from the population that already resides in the City and that there will be long-term continuing growth of the Southern California economy.

SCAG employment forecasts for the City are based on the continuation of historic and recent growth trends. It is recognized, that in order to achieve the higher employment levels adopted by the Framework Element the City cannot adopt a business-as-usual approach but must devise an aggressive business retention and outreach program to assure adequate job growth within the City to maintain fiscal stability (refer to Chapter 7). Such a program must be correlated with actions to mitigate the impacts of growth on the natural environment, public infrastructure and services, and quality of life of the City's residents. Without the mitigation of these impacts, businesses will choose to locate in communities exhibiting a higher quality environment.

FRAMEWORK ELEMENT PLAN GROWTH DISTRIBUTION

The citywide population, employment, and household forecasts described in the previous section have been distributed to City subregions and to community plan areas within these subregions (see Table 2-2). These distributions are the result of a methodology for disaggregating the citywide forecasts provided by SCAG. The methodology reflects the Framework Element Long-Range Land Use Diagram and an adjustment of historic growth trends and land values in each plan area to account for the attraction of development to transit stations and corridors and the districts, centers, and boulevards defined by the Framework Element.

The population, employment, and housing distribution should be used to guide future community plan

amendments. It should be recognized, however, that these figures are "best estimates" of citywide distributions. They attempt to forecast how market trends will be impacted by the implementation of the Framework Element. In terms of economic and market forces, these City subregions function as realistic submarkets of the City, taking into account forces that transcend community plan boundaries.

The Framework Element utilizes the following 2010 estimates:

Subregion	Population Growth	% of City Population
1. Northeast L.A.	106,250	12.9
2. South L.A.	106,595	13.0
3. Metro Center	108,700	13.2
4. Southwest L.A.	67,320	8.2
5. Central L.A.	41,245	5.0
6. Southeast L.A.	80,495	9.8
7. Northeast L.A.	77,460	9.4
8. Northwest L.A.	78,175	9.5
9. Southwest L.A.	74,595	9.1
10. West L.A.	35,340	4.3
11. Harbor	44,990	5.5
Citywide	821,165	99.0

As implementation proceeds, the community plan population forecasts may be revised based upon specific land use actions adopted through the community plan update process. If one area cannot accommodate the forecasted population, then other community plans within the same subregion should have sufficient capacity to accommodate the subregional forecasts above. Forecasts may change as SCAG updates its information or as new information is obtained from the Framework Element's monitoring system.

RATES OF GROWTH

While the Framework Element has adopted a year 2010 planning horizon and provided estimated population forecasts and anticipated citywide distributions, it is not dependent upon these population levels or distributions for its implementation. It does not mandate specific levels of growth for any specific area (neither minimums nor caps). The population could grow more slowly than currently anticipated as a result of economic trends, or again expand rapidly as a result of changing immigration levels and birth rates. Population loss could also occur. The Framework Element policies will not directly prevent nor cause population growth to occur.

Population levels are dependent on a wide variety of factors, many of which are totally unrelated to land use planning. Such variables as birth and death rates, income, migration and immigration levels, Federal immigration policies, natural disaster, economic trends and employment levels, etc. all interact to determine whether population grows or declines.

Population levels, while partially related to building permit (development) activity, are also not directly tied to the number of housing units available. Population increases (or decreases) can occur during periods of slow or even no growth in the number of available residential units. Similarly it is possible, at least for short periods, to have stable or declining population levels during periods of rapid housing unit

construction. Over shorter time periods, construction cycles and populations trends may not be consistent.

The Framework Element is designed to accommodate population growth largely within centers, districts, and mixed-use boulevards whenever it eventually occurs. Forecasted population levels may be reached by 2010 as forecasted, or within a totally different time horizon for reasons unrelated to the general plan.

GROWTH MONITORING

After the Framework Element is adopted, the City will establish a growth monitoring program that will provide important information regarding the accuracy of future growth estimates and the distribution of that new development by community plan area. This monitoring program will annually document what has actually happened to the City's population levels, housing construction, employment levels, and the availability of public infrastructure and public services. Information on environmental conditions will also be monitored on a yearly basis to maintain and update an environmental database, which will be used to facilitate but not replace, environmental review for subsequent programs and projects in accordance with CEQA.

Information for the monitoring system will be taken from the best sources available to the City, such as building permit information and other readily available City data on business; Department of Water and Power and School District information; County Assessor's files; commercially available development data; State Employment Development Department statistics; Census Bureau; SCAG data; University of California Los Angeles Business Forecast; and other data as they may become available.

Infrastructure data will be developed from a cooperative effort among the City departments responsible for infrastructure and public services. State and regional agencies, such as the Los Angeles Unified School District and the Metropolitan Transportation Authority are important to complete the annual review of the City's growth and infrastructure.

Although one of the Framework Element's primary goals is to encourage new development to locate in centers, districts and boulevards throughout the City, market forces will ultimately determine the distribution of future growth. Yearly monitoring will help evaluate whether the incentives that are linked to targeted growth areas are working effectively with market forces to attract new development.

The information from such a monitoring system will be presented to the City Council in the form of an Annual Report on Growth and Infrastructure, which can be used as the basis for revision of policies as needed to meet the goals of the Framework Element. The status of environmental mitigation requirements can also be determined and policies can be changed if desired results are not being obtained. Information on amounts and location of growth can be provided and policies influencing this growth can be revised if needed. In this fashion, the Framework Element can be continually updated to meet changing conditions, and the implementation mechanisms revised or altered to achieve the desired goals. SCAG will require monitoring in all its subregions in a similar manner.

FRAMEWORK ELEMENT THEORETICAL BUILDOUT

While the General Plan Framework Element is based on the forecasts defined in Tables 2-1 and 2-2, development in accordance with the uses and densities prescribed in the Long-Range Land Use Diagram could exceed them. This is based on the assumption that all lands in the City would convert to the maximum density allowed, referred to as the "Theoretical Buildout." "Theoretical Buildout" will not happen. Experience indicates that many properties would not be developed to their maximum permitted densities. For example, fewer than five percent of the commercial properties currently allowed to develop at a floor area ratio of 1.5:1 have been developed at this intensity.

[Click Here to View Table 2-2](#)
[Forecast Growth by Subregions and Community Plan Areas](#)

Should population and employment growth be greater than the levels anticipated by the Framework Element, policy stipulates that studies be undertaken to correlate with the necessary supporting capital, facility, or service improvements and/or demand reduction programs. At the same time, the impacts of the additional level of growth must be found to be consistent with the findings of the Environmental Impact Report regarding their level of significance. Should additional potential impacts be identified, these would be subject to further environmental review in accordance with the CEQA. This would be facilitated by the implementation of a program to monitor the characteristics and impacts of growth and availability of infrastructure and public services (the "Monitoring Program") and annual reporting of this information to the City Council (the "Annual Report on Growth and Infrastructure") as a basis for the planning and funding of necessary improvements.

HOUSING ELEMENT

The Housing Element is a portion of the general plan and as such, must be consistent with the Framework Element. Further, the most recently adopted Housing Element has identified the Framework Element as an implementation mechanism for several of the programs that it contains. While the Housing Element and the Framework Element are closely related, there are data references within each that appear to be inconsistent. Most of the apparent inconsistency is created by differing time horizons and methodological requirements within the two documents.

Calculation of the number of housing units that could be developed in the City as determined, separately, by the Housing Element and General Plan Land Use Element (community plans) seems to create the most confusion. Housing unit calculations from either the community plans or the Framework Element, using general plan designations per CEQA requirements, assume that all residential units are located on properties planned for residential or mixed-use developments that integrate housing with commercial uses and that these properties are built to their maximum capacity.

This is a theoretical "capacity" figure which overestimates the realistic number of dwelling units that would likely be constructed. All properties are assumed to be redeveloped to their maximum capacity despite their current use or the economic feasibility of this occurring. As calculated in the Framework Element, this estimate also does not consider limitations imposed by the existing number of parcels and their irregular configurations. Further, it assumes all residential uses on commercially zoned lands are redeveloped to their planned, non-residential use. The Framework Element housing capacity estimate is considered a "worst-case" impact assessment for the purposes of CEQA, which means that it assumes land is completely builtout to the fullest extent allowed by the zoning.

Within the Housing Element more precise calculations are required. The Housing Element is concerned with the availability of sufficient parcels of land (housing capacity) within the City with the appropriate current zoning to meet the City's housing needs, including its share of regional housing needs, over the next five years. Residential units currently on land not planned for residential use are not excluded. Because of Los Angeles' size and the lack of detailed land use and zoning information for every parcel, complex estimating methodologies must be devised and utilized to produce the required capacity estimates incorporating information on parcelization, zoning, and realistic (economically feasible) buildout.

The Housing Element estimates are produced for a specific purpose with detailed requirements and will *not be comparable* to Framework housing unit theoretical buildout calculations. However, they are *not incompatible* with these Framework calculations. Because of the additional restrictions on Housing

Element housing capacity data (except for residential units on non-residential parcels), the "housing capacity" estimate in the Housing Element is lower than that found in the Framework Element. The housing capacity numbers will change as the Housing Element is updated.

The 1993 Housing Element distributed the Regional Housing Needs Assessment allocation, produced by SCAG for the City of Los Angeles, into income categories and divided these allocations further by subregions of the City *based solely on the relative size of each subregion*. The Framework Element produced employment and income forecasts for each community plan area for the year 2010 as well as housing unit forecasts by rent and price level, and from this derived housing affordability levels by community plan area. Comparison between market trend data for 2010 and Framework Element impacts for 2010 were also calculated. Impacts of other policy actions on housing affordability can be examined through varying inputs to the Framework Element economic impact and forecast model. In combination with the policies in the Housing Chapter of the Framework Element, these distributions implement the Fair Share Allocation program documented in the Housing Element.

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Chapter 3

Land Use

INTRODUCTION AND SUMMARY OF ISSUES

INTRODUCTION

This section summarizes key land use issues and presents the goals, objectives, policies, and programs that capitalize on the City's opportunities. The policies establish new categories of land use whose locations are generally depicted on a diagram (Figures 3-1 to 3-4, the Long-Range Land Use Diagram) that replaces the adopted citywide Centers Concept. The new categories -- Neighborhood District, Community Center, Regional Center, Downtown Center, and Mixed-Use Boulevard -- are broadly described by ranges of intensity/density, heights, and lists of typical uses. The definitions reflect a range of land use possibilities found in the City's already diverse urban, suburban, and rural land use patterns. Their generalized locations reflect a conceptual relationship between land use and transportation. The diagram is intended to represent an initial distribution of uses and growth based on the factors discussed below. While it is more detailed than the Centers Concept, the diagram does not connote land use entitlements or affect existing zoning for properties in the City of Los Angeles. It, and the new categories, are intended to serve as the guideline for the subsequent amendment of the City's community plans where the precise designation and alignment of uses will be determined.

Framework Element policies reflect and continue the land use provisions of the Specific Plans that have been adopted for various areas of the City. The Framework Element does not supersede adopted Specific Plans.

The Land Use policy encourages the retention of the City's stable residential neighborhoods and proposes incentives to encourage whatever growth that occurs to locate in neighborhood districts, commercial and mixed-use centers, along boulevards, industrial districts, and in proximity to transportation corridors and transit stations. Land use standards and densities vary by location to reflect the local conditions and diversity and range from districts oriented to the neighborhood, the community, the region, and, at the highest level, the national and international markets.

It is the intent of the Land Use policy to encourage a re-direction of the City's growth in a manner such that the significant impacts that would result from the continued implementation of adopted community plans and zoning can be reduced or avoided. This will provide for the protection of the City's important neighborhoods and districts, reduce vehicular trips and air emissions, and encourage economic opportunities, affordable housing, and an improved quality of life.

Improvement of development is addressed through quality standards for multi-family residential neighborhoods and the establishment of pedestrian-oriented districts.

To facilitate growth in those areas in which it is desired, the Land Use Policies provide for the (1) establishment of a process to expedite the review and approval of development applications that are consistent with the Framework Element and community plans, (2) the implementation of infrastructure and public service investment strategies, and (3) a program to monitor growth and infrastructure and public service capacity and report their status annually to the City Council.

Throughout the Land Use Chapter the terms "conservation" and "targeted growth" are used extensively. The following defines their applications:

"Conservation areas" consist of all areas outside of the designated districts, centers, and mixed-use boulevards. Within conservation areas the prevailing uses and densities will be maintained. New development should be comparable in type and scale with existing development. In areas designated by the community plans for single-family dwellings, new development would consist of the infill of vacant lots or replacement of existing units with other single-family houses in accordance with the densities defined in the community plans. In areas designated by the Framework Element and community plans for multi-family housing, vacant lots may be developed and existing units may be replaced in accordance with the densities defined by the community plans. In areas, designated for commercial uses, development may occur in conformance with the land use designations of the community plans. In all areas, remodels and expansion of existing structures are permitted.

"Targeted growth areas" refer to those districts, centers, and boulevards where new development is encouraged and within which incentives are provided by the policies of the Framework Element. These are located in proximity to major rail and bus transit corridors and stations; in centers that serve as identifiable business, service, and social places for the neighborhood, community, and region; as reuse of the City's boulevards; and as reuse of the City's industrial districts to facilitate the development of new jobs-generating uses. Generally, the density and scale of development on any parcel would significantly increase above existing levels. For example, areas of one- to two-story buildings might be developed with three- or four-story buildings or higher. In these areas, the policies of the Framework Element can assist in effectively shaping the form and character of growth, improving the quality of development, mobility, and reducing air pollution to enhance the quality of life for the City's residents. These growth areas are identified in areas designated by the community plans for commercial and industrial uses at the time of Framework Element adoption.

SUMMARY OF LAND USE CONDITIONS AND CHARACTERISTICS

The following summarizes the significant land use characteristics and conditions in the City of Los Angeles, as presented in the Technical Background Report and modified by impact analyses of the City's existing community plans. These issues constitute the baseline of opportunities and problems which are addressed by the goals, objectives, policies, and programs defined in the subsequent section of this Chapter.

Strengths

1. The diversity of the City's population affords the opportunity to further create distinct neighborhoods and communities that accommodate a range of uses and exhibit physical characteristics reflective of the cultures that define them. A successful composition of distinct multi-cultural neighborhoods and places can enhance the City's image and quality of life.
2. The City's setting of large-scale open spaces, including the Santa Monica, San Gabriel, and Santa Susana Mountains, Baldwin Hills, Griffith Park, the Sepulveda Dam basin, the Los Angeles River and the coastline, represent a significant asset of natural diversity that has attracted and will continue to attract people to move to the City.
3. The City's "stable" single- and multi-family residential neighborhoods represent significant assets whose character and qualities merit protection. Historically, the "strong" image exhibited by the City's single-family residential neighborhoods has distinguished Los Angeles from other metropolitan areas.

4. The City contains many commercial and industrial districts whose qualities and character represent important symbolic, functional, and economic assets that should be preserved and enhanced. Many of these viable districts, such as Boyle Heights, Highland Park, Larchmont, Fairfax, Westwood Village, Leimert Park, Melrose, and Ventura Boulevard in Tarzana, are directly related to and support surrounding residential neighborhoods. Other districts, such as Crenshaw, Warner Center and Century City, attract a regional customer base, while still others, such as Little Tokyo, Westlake, and Koreatown, are intimately linked to both their surrounding neighborhoods, the larger region, and the world.
5. The City contains a diversity of industrial districts that provide jobs to the City's residents and to people living in the surrounding region. While industry has been significantly impacted by recession in the early 1990's, the City contains a viable industrial base. There are a number of sectors and areas that have been economically stable and will continue to play an important role in sustaining the City's fiscal viability. These include the Port of Los Angeles, Los Angeles International Airport, entertainment industry, and clusters abutting downtown and the San Fernando Valley.
6. The City's concentration of uses that are oriented to the greater Southern California region (and State) are assets that provide the opportunity and stimulus for the development of similar and supporting uses. Examples include the cluster of government and civic buildings and corporate offices in downtown, the Convention Center, and sports facilities (Coliseum and Dodger Stadium).

Historic Impacts of Growth

1. The City's and region's growth has resulted in significant traffic congestion and air pollution.
2. Development intensification in some areas of the City has adversely impacted the integrity and character of existing residential neighborhoods and community-oriented commercial districts.
3. In some neighborhoods, apartments have replaced single-family homes, which has resulted in resident relocation and loss of ownership units. At the same time, the City's total number of ownership units has increased due to the construction of condominiums and townhomes.
4. The physical design of many higher-density apartments and condominiums has often been insensitive to the character of the neighborhoods in which they are located, has been of poor quality, and has offered few amenities, which frequently has contributed to public opposition to the further development of such units.
5. In some areas, high-density development directly abuts low-density, single-family residential neighborhoods resulting in visual and physical incompatibilities and conflicts.
6. The construction of light rail facilities has resulted in some conflicts with adjacent land uses. These conflicts have included short-term construction impacts, vehicular and pedestrian crossing of rail lines, noise, and vibration.

Future Growth Impacts

1. If population growth resulted in all lands in the City being developed to the maximum densities currently permitted, there would be severe impacts on transportation and utility infrastructure, public services, economic stability, and the quality of life for the City's residents. Estimated average speeds on freeways and arterials would decline to levels below 20 miles per hour and air emissions and pollution would be substantially increased. Development within the City's residential neighborhoods and commercial districts would be of much greater scale and mass,

significantly changing their character.

2. The growth reflected in this Element is based on projections from the Southern California Association of Governments. Capacities and policies contained in the Element are intended to accommodate this growth, should it occur. However, projections of population do not always occur in quantities or at locations as expected.
3. Intensification of housing is opposed in many neighborhoods, because it is associated with increased traffic congestion, crime, impacts on schools and parks, and residential overcrowding.
4. The recycling and intensification of development that are necessitated to accommodate future growth provide an opportunity to improve the character and quality of development. Development in proximity to transit stations, along boulevards, and in other key centers affords the opportunity to intermix uses, establish pedestrian areas, improve open space amenities, design structures which are responsive to their setting, and incorporate other elements that create both a "sense of place" and a "sense of community."
5. Changes in the City's demographic characteristics afford the opportunity for the consideration of forms and density of land use development which traditionally have not occurred in Los Angeles. Some cultures have favored forms of housing that support multiple generations of families, such as units clustered around shared communal facilities and kitchens. "Co-housing" is one example which involves individually owned self-sufficient dwellings with some feature owned in common, (e.g. laundry, play areas, garden, community rooms, etc.). Open air markets are typical of many cultures. There is an opportunity to reflect the diversity of cultures in the patterns and forms of new development.
6. Construction of rail and other fixed-route transit facilities afford the opportunity to develop new uses and structures and public open spaces at their stations and along their routes. Jointly, the City of Los Angeles and Metropolitan Transportation Authority (MTA) have adopted a policy to focus growth in the vicinity of transit stations. An emphasis has been placed on the development of mixed-use projects (commercial and residential) as focal points for their surrounding neighborhood while affording mobility to and from other parts of the City and region.

Development Capacity

1. The City of Los Angeles has insufficient vacant properties to accommodate forecast population increases. Consequently, the City's growth will require the reuse and intensification of existing developed properties. Such growth could, unless carefully planned, significantly alter the character of many neighborhoods and districts in an undesirable manner.
2. While there is sufficient land zoned to accommodate the housing needs of forecast population growth, development to the permitted densities will necessitate the replacement of many existing affordable units and impact the character of established neighborhoods. Consequently, it may be appropriate to consider the reuse of underutilized and economically obsolete commercial properties as alternatives.
3. The City's commercially-zoned corridors, districts, and centers have the capacity to accommodate growth that considerably exceeds economic market demands well into the 21st Century. While densities at a 1.5:1 floor area ratio (FAR) are generally permitted, existing development averages approximately 0.58:1 and market demand forecasts indicate increase of only 10 to 15 percent.

4. Existing zoning of the City's industrial lands, theoretically, could accommodate substantial new industrial development and jobs. Currently, these areas are developed at an average FAR of 0.27:1 as compared with a permitted FAR of 1.5:1. This, however, does not represent "real" capacity for new development, as almost all industrial lands are developed and the functions of industrial buildings, typically, limit their height to no more than one-story (as reflected in the existing FAR). Many industrial buildings, however, are vacant and provide inventory that can be re-used or replaced in the future.

Existing Pattern and Character of Development

1. The distribution and low-density of single-family units coupled with their physical separation from commercial services, jobs, recreation, and entertainment necessitates the use of the automobile. This, in turn, leads to numerous single-purpose vehicle trips, long distances traveled, traffic congestion, and air pollution.
2. Existing residential densities inhibit the development of an effective public transportation system in many areas of the City.
3. Existing multi-family residential neighborhoods (approximately 53 percent of all housing units) exhibit a variety of characteristics and conditions. Some have been developed at or near the maximum densities permitted and generally convey a homogeneous character. Some are developed with multi-family dwellings at lesser than permitted densities and have capacity for growth. Others exhibit a wide range of housing types and densities. Residents from many neighborhoods have expressed their concern about further neighborhood intensification and their desire to retain existing units at present densities.
4. The narrow depth of parcels along many of the City's commercial corridors results in development which conflicts with adjacent residential neighborhoods.
5. There is a significant lack of open space and parks in the City to support the needs of the population and there is a severe inequity of their distribution throughout the City. The transmission and utility corridors, flood control improvements (including the Los Angeles River), railroad corridors, and other linear elements which cross the City provide the opportunity for the introduction of open space improvements.
6. The future of the City's industrial lands is uncertain due to the regional recession, national economic restructuring, and relocation of businesses to other cities and states. Due to the loss of industrial activity, the appropriate use of some of these properties is in question and has led some to propose their re-use for non-industrial purposes. Of concern is the amount of industrial land that should be allowed to convert to other uses, e.g., marginal use areas located adjacent to stable residential neighborhoods of small and shallow lots with limited access to major transportation routes.
7. Many of the industrially-zoned properties encompass large areas in the San Fernando Valley, Downtown, and Port area, affording opportunities to focus City efforts to preserve industrial planned lands for such use as the economy recovers.

Regional Patterns of Land Use and Development

1. The City of Los Angeles experiences a net in-migration of vehicular trips in the morning and a net out-migration in the evening, as it provides jobs for people living in outlying "jobs poor" communities. This pattern has remained rather constant despite the weak economy and the regional loss of employment opportunities. As a result, regional traffic congestion and air quality

have not improved to desired levels. Although long-term traffic and air quality improvements are possible, they will require, among other factors, an improved jobs/housing balance in the peripheral communities as well as a stable regional economy.

2. New technologies may afford the opportunity to reduce vehicular miles traveled by enabling employees to work at home and conduct many business activities electronically.

Non Home-to-Work Destinations

1. Non home-to-work trips now result in more congestion and air pollution than home-to-work trips. Land uses that primarily generate non home-to-work trips (shopping centers, entertainment complexes, sporting venues, recreational and cultural facilities) typically serve a retail function and draw customers from both the City and the surrounding region, thereby contributing to traffic congestion and air pollution.
2. The retail function of many of the above mentioned destinations inhibits effective use of public transportation because customers often make purchases and need to transport packages home. At the same time, these trips occur at the convenience of the traveler, the timing of which frequently does not coincide with a fixed transit schedule.

Existing Development Policy The Centers Concept

The "Centers Concept" was adopted in 1974 as the guide for growth in the City. It focuses growth in a number of Centers that are to be interconnected with public transit and conserves existing residential neighborhoods.

1. The "Centers" Concept differentiates these areas of growth strictly by density and does not reflect the diversity of their functional roles, land uses, physical form, character, and users. Consequently, this definition provides ineffective guidance for growth and development.
2. Intensification of a number of the designated Centers, such as Boyle Heights and Highland Park, which are predominantly neighborhood-oriented one- and two-story areas, to their maximum permitted densities would adversely impact their present character.
3. The application of the existing "Center" designation is inconsistent and does not reflect the City's pattern or character of development. As such, many areas outside of the designated Centers exhibit the same characteristics that are supposed to define the designated Centers. For example, Brentwood and Westwood represent regional-serving retail and office commercial centers similar to the designated Sherman Oaks and Miracle Mile Center. Similarly, the Westside Pavilion, Beverly Center, and Northridge Mall are comparable to the designated Panorama City and Crenshaw Centers.
4. Some major developments, such as the Beverly Center and the Westside Pavilion, have occurred outside of the areas that were targeted for growth by the Centers Concept, the City's official land use policy. This has resulted in a degree of uncertainty for residents, property owners, and the providers of public infrastructure and services.
5. The diverse character of the City's land uses affords the opportunity to create a new classification of Centers, Boulevards, and Neighborhoods that clearly differentiates their functional role, uses, density, and physical form and character. Such differentiation can enhance the City as a collection of distinct places, which enhance both community identity and residents' quality of life.

Community Plans

Community plans have been adopted as the City's Land Use Element to guide growth and development in each

of its 35 community areas.

1. The diverse character of the City's land uses affords the opportunity to create a new classification of Centers, Boulevards, and Neighborhoods that clearly differentiates their functional role, uses, density, and physical form and character. Such differentiation can enhance the City as a collection of distinct places, which enhance both community identity and residents' quality of life.
2. A number of community plans are being amended, including the communities of Northeast, Sylmar and West Adams. There was extensive public input and consensus-building for each area.
3. Though not a community plan, the recently completed Downtown Strategic Plan serves as an updated guide for new development in the Central City area.

Specific Plans

The City has adopted a number of specific plans that set detailed development regulations in their local areas. Some of these impose limits on the amount of development that can be accommodated to reflect transportation constraints and intended community character and some impose design guidelines to improve the quality of physical development. Among them are Specific Plans for Ventura Boulevard, Warner Center, Central City West, Park Mile, Porter Ranch, Sherman Oaks-Reseda, Century City, San Vicente Scenic Corridor, Mt. Washington, Granada Hills, Mulholland Scenic Corridor, Pacific Palisades Village, Westwood Village etc. In many respects, these plans advance the fundamental goals of the Framework Element for focusing growth, increasing mobility, reducing air pollution, and establishing a higher quality built environment for the City's residents.

Adoption of the Framework Element does not supersede nor alter adopted specific plans. Adopted specific plans are consistent with the General Plan Framework Element.

Land Use/Transportation Policy

As a joint effort of the City of Los Angeles and Metropolitan Transportation Authority, a policy has been adopted to foster the development of higher-density mixed-use projects within one-quarter mile of rail and major bus transit facilities. Adherence to this policy will significantly influence the form and character of development in the City.

As additional rail transit routes are confirmed and funded (or unfunded), policy enables the revision of the plans to establish appropriate uses and densities in proximity to these facilities, in accordance with the *Land Use/Transportation Policy*.

Redevelopment Plans

Redevelopment plans have been adopted by the Community Redevelopment Agency to physically and economically revitalize a number of areas throughout the City. Some plans will affect the type and pattern of development. Among the plans are those for Hollywood, Downtown, Beacon Street (San Pedro), Hoover Street, Watts, Crenshaw, and Little Tokyo.

Approved Development Projects

A number of major development projects have been approved that will influence the pattern of development and character of the City. Among these are Playa Vista, Porter Ranch, Howard Hughes Center, and Union Station.

GOALS, OBJECTIVES, AND POLICIES

The following presents the goals, objectives, and policies for land use in the City of Los Angeles. For the purpose of the Los Angeles City General Plan, a **goal** is a direction setter; an ideal future condition related to public health, safety or general welfare toward which planning implementation is measured. An **objective** is a specific end that is an achievable intermediate step toward achieving a goal. A **policy** is a statement that guides decision making, based on the plan's goals and objectives. Programs that implement these policies are found in the last chapter of this document. Programs are referenced after each policy in this document.

ISSUE ONE: DISTRIBUTION OF LAND USE

ISSUE TWO: USES, DENSITY AND CHARACTERISTICS

- SINGLE-FAMILY RESIDENTIAL
- MULTI-FAMILY RESIDENTIAL
- NEIGHBORHOOD DISTRICTS
- COMMUNITY CENTERS
- REGIONAL CENTERS
- DOWNTOWN CENTER
- GENERAL COMMERCIAL AREAS
- MIXED-USE BOULEVARDS
- INDUSTRIAL
- TRANSIT STATIONS
- PEDESTRIAN-ORIENTED DISTRICTS
- HISTORIC DISTRICTS

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HOLLYWOOD Community Plan

December 13, 1988

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HOLLYWOOD PLAN

PURPOSES

USE OF THE PLAN

The purpose of the Hollywood Community Plan is to provide an official guide to the future development of the Community for the use of the City Council, the Mayor, the City Planning Commission; other concerned government agencies, residents, property owners, and business people of the Community; and private organizations concerned with planning and civic betterment. For the Council, the Mayor and the Planning Commission, the Plan provides a reference to be used in connection with their actions on various city development matters as required by law.

The Plan is intended to promote an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community, within the larger framework of the City; guide the development, betterment, and change of the Community to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits, land development and other trends; and protect investment to the extent reasonable and feasible.

This Plan proposes approximate locations and dimensions for land use. Development may vary slightly from the Plan provided the total acreage of each type of land use, the land use intensities, and the physical relationships among the various land uses are not altered.

The Plan is not an official zone map and while it is a guide it does not imply any implicit right to a particular zone or to the land uses permitted therein. Changes of zone are considered under a specific procedure established under the Los Angeles City Charter and the Los Angeles Municipal Code, subject to various requirements set forth therein.

The Plan is subject to revision within five years, to reflect changes in circumstances.

OBJECTIVES OF THE PLAN

1. To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area.

To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.

2. To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.
3. To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

To encourage the preservation and enhancement of the varied and distinctive residential character of the Community, and to protect lower density housing from the scattered intrusion of apartments.

In hillside residential areas to:

- a. Minimize grading so as to retain the natural terrain and ecological balance.
 - b. Provide a standard of land use intensity and population density which will be compatible with street capacity, public service facilities and utilities, and topography and in coordination with development in the remainder of the City.
4. To promote economic well being and public convenience through:
 - a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards.
 - b. Designating land for industrial development that can be so used without detriment to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary to this purpose.
 - c. Encouraging the revitalization of the motion picture industry.
 - d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.
 5. To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.
 6. To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.
 7. To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.

POLICIES

The Hollywood Community Plan has been designed to accommodate the anticipated growth in population and employment of the Community to the year 2010. The Plan does not seek to promote nor to hinder growth; rather it accepts the likelihood that growth will take place and must be provided for.

The Plan encourages the preservation of lower density residential areas, and the conservation of open space lands.

Much of the Hollywood Community is hillside and mountainous terrain, and as much of the remaining undeveloped land as feasible is to be preserved for open space and recreational uses. It is also the City's policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historic Monuments Element of the General Plan; furthermore, the Hollywood Plan encourages the addition of suitable sites thereto.

LAND USE

COMMERCE

Standards and Criteria

The commercial lands (including associated parking) designated by this Plan to serve residential areas are adequate in quantity to meet the needs of the projected population to the year 2010, as computed by the following standards:

1. 0.6-acres per 1,000 residents for commercial uses for neighborhood or convenience-type commercial areas;
2. 0.2 acres per 1,000 residents for commercial uses for community shopping and business districts, including service uses and specialized commercial uses.

Parking areas should be located between commercial and residential uses on the commercially-zoned properties where appropriate to provide a buffer, and shall be separated from residential uses by means of at least a solid masonry wall and landscaped setback.

Features

The Plan provides approximately 1,139 acres of commercial and related parking uses.

The focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street. The Hollywood Center is included in the Hollywood Redevelopment Project area as adopted in May 1986. This center area shall function 1) as the commercial center for Hollywood and surrounding communities and 2) as an

entertainment center for the entire region. Future development should be compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system. Developments combining residential and commercial uses are especially encouraged in this Center area.

The Plan recognizes the concentration of medical facilities in the vicinity of the Sunset Boulevard/Vermont Avenue intersection; it is identified as the East Hollywood Center Study Area. Within an adjacent to this center should be housing for employees as well as retail establishments serving the medical complex personnel and clients. While a commercial development intensity of up to 3:1 FAR is envisioned, the Community Commercial designation should not be expanded beyond the current sites until the Metro Rail system or some other high capacity transportation facility is operational.

Strategically distributed throughout the Community would be neighborhood shopping areas, emphasizing convenience retail stores and services. The Plan encourages the retention of neighborhood convenience clusters offering retail and service establishments oriented to pedestrians.

HOUSING

Standards and Criteria

The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon, shall be limited in accordance with the following criteria:

1. The adequacy of the existing and assured circulation and public transportation systems within the area;
2. The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities;
3. The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.

To the extent feasible, the "cluster concept" is the preferred method to be utilized for new residential development in hillside areas in order to use the natural terrain to best advantage and minimize the amount of grading required. However, development by conventional subdivision shall not be precluded. The "cluster concept" is defined as the grouping of residential structures on the more level parts of the terrain while retaining a large area (75 to 80 percent) in its natural state or in a park-like setting. Density patterns indicated on the Plan Map may be adjusted to facilitate cluster developments, provided that the total number of dwelling units indicated in any development is not increased from that depicted on the Plan Map.

New apartments should be soundproofed and should be provided with adequate usable open space at a minimum ratio of 100 square feet per dwelling unit excluding parking areas, driveways and the required front yard setback.

Features

Apartments in high-density areas provide housing for about 37,430 persons. Medium and low-medium density apartment and townhouse areas provide for about 127,105 persons. The low-density residential character of many parts of Hollywood should be preserved, and lower density (Low Medium I or more restrictive) residential neighborhoods should be protected from encroachment by other types of uses, including surface parking. It is the intent of this Plan that all natural slopes generally in excess of 15% be limited to the minimum density range. Transitional building heights should be imposed, especially in the Medium density housing designated areas where this designation is immediately adjacent to properties designated Low Medium I or more restrictive.

The Plan encourages the preservation and enhancement of well defined residential neighborhoods in Hollywood through (1) application of Historic Preservation Overlay Zones where appropriate, and/or (2) preparation of neighborhood preservation plans which further refine and tailor development standards to neighborhood character.

The Plan encourages the rehabilitation and/or rebuilding of deteriorated single-family areas for the same use. Single-family housing should be made available to all persons regardless of social, economic, and ethnic background.

Additional low and moderate-income housing is needed in all parts of this Community. Density bonuses for provision of such housing through Government Code 65915 may be granted in the Low-Medium I or less restrictive residential categories.

The proposed residential density categories and their capacities are:

Residential Density	Dwelling Units per Gross Acre*	Persons per Gross Acre	Gross Acres	& of Resd. Land	Pop. Capacity	Pop. Capacity
Minimum	.5 to 1	3	945	11.6	2,835	1.2
Very Low II	2+ to 3	9	1,667	20.5	15,000	6.4
Low I	3+ to 5	12.5	410	5.0	5,125	2.2
Low II	5+ to 7	18.5	2,373	29.2	43,900	19.0
Low Med I	7+ to 12	26	439	5.4	11,415	5.0
Low Med II	12+ to 24	40	959	11.9	38,360	16.6
Medium	24+ to 40	74	1,045	12.8	77,330	33.4
High-Med	40+ to 60	95	122	1.5	11,590	5.0
High	60+ to 80	152	170	2.1	25,640	11.2
Totals			8,130	100.0	231,395	100.0

* "Gross Acre" includes one-half of abutting streets.

The 2010 population of Hollywood is projected to be approximately 219,000 persons, an increase of 38,000 over the 1980 population.

The Plan capacity is 5.7% in excess of the projected population figure for the year 2010.

INDUSTRY

Standards and Criteria

Industrial lands are located on a citywide basis without regard to the boundaries of individual communities or districts, under the general principle that such employment should be available within a reasonable commuting distance from residential locations. On-street parking should be discouraged in industrial areas.

If industrial expansion is permitted into residential areas, it should be conducted according to a planned development program to avoid a mixture of uses. Industrial lands are intended to be limited and restricted to types of uses which will avoid nuisance to other uses on adjacent lands.

Features

The Plan designates approximately 335 acres of land for industrial uses. A large proportion should be encouraged to be occupied by the types of industry which are indigenous to Hollywood-motion picture and television production, radio studios, sound and recording studios, film processing studios, and motion picture equipment manufacturing and distribution. The Plan proposes more intensive utilization of existing industrial sites and encourages the vacation of appropriate local streets and alleys in industrial areas for purposes of lot assemblage. The Plan recognizes the need to review and revise the Zoning Code relative to the classification of many entertainment industry uses.

To preserve this valuable land resource from the intrusion of other uses, and to ensure its development with high quality industrial uses in keeping with the urban residential character of the community, the Plan proposes classifying industrial land in restricted zoning categories, such as the MR zones, wherever possible.

CIRCULATION

Major transportation corridors serving other parts of the Los Angeles metropolitan area cross the Hollywood Community and thus the highways and streets of the community must accommodate traffic generated both within and without the community. To accommodate the transportation needs of the Community, the circulation system proposed in the Plan must be supplemented by a greatly improved public transportation system and/or additional highways and freeways. Unless such additional modes of transportation are provided, acute traffic congestion will be further aggravated in most parts of the community.

Several proposed Metro Rail stations are to be located in Hollywood. If higher intensity development is to be encouraged in the vicinity of these Metro Rail stations,

station area master plans should be prepared.

Standards and Criteria

Highways and local streets shown on this Plan shall be developed in accordance with standards and criteria contained in the Highways and freeways Element of the General Plan and the City's Standard Street Dimensions. Design characteristics which give street identity such as curves, changes in direction and topographical differences, should be emphasized by street trees and planted median strips and by paving. Streets, highways and freeways, when developed, should be designed and improved in harmony with adjacent development and to facilitate driver and passenger orientation.

The full residential, commercial and industrial densities and intensities proposed by the Plan are predicated upon the development of the designated major and secondary highways and freeways. No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated. Adequate highway improvements shall be assured prior to the approval of zoning permitting intensification of land use in order to avoid congestion and assure proper development. The Plan recognizes that within the designated Center Study Areas of Hollywood innovative parking programs should be instituted to accommodate these Centers' parking needs through creation of more available parking capacity and more efficient use of parking facilities.

Features

The Plan incorporates the Highways and Freeways Element of the Los Angeles General Plan. Collector streets are shown to assist traffic flow toward major and secondary highways. A transportation improvement and management plan is needed to create an integrated program of transportation mitigation measures such as traffic flow management, demand management programs, street widening, public transit, and private transit. The transportation program described in Section 518.1 of the Hollywood Redevelopment Plan is a component of this Community Plan-wide program.

SERVICE SYSTEMS

The public facilities (such as schools, libraries, etc.) shown on this Plan are to be developed in accordance with the standards for need, site area, design, and general location expressed in the Service-Systems Element of the General Plan. (See individual facility plans for specific standards.) Such development shall be sequenced and timed to provide a workable, efficient, and adequate balance between land use and service facilities at all times. The Plan recommends that a study be undertaken to develop revised standards and facility requirements

appropriate to a highly developed urban community including the provision of additional small parks.

The full residential, commercial, and industrial densities and intensities proposed by the Plan are predicated upon the provision of adequate public service facilities, with reference to the standards contained in the General Plan. No increase in density shall be effected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development. In mountain areas no tentative subdivision map shall be approved until reviewed and approved by the Fire Department.

RECREATION AND PARKS

Policies

It is the City's policy:

1. That the desires of the local residents be considered in the planning of recreational facilities.
2. That recreational facilities, programs and procedures be tailored to the social, economic and cultural characteristics of individual neighborhoods and that these programs and procedures be continually monitored.
3. That existing recreational sites and facilities be upgraded through site improvements, rehabilitation and reuse of sound structures, and replacement of obsolete structures, as funds become available.
4. That, in the absence of public land, and where feasible, intensified use of existing facilities and joint use of other public facilities for recreational purposes be encouraged.
5. That the expansion of existing recreational sites and the acquisition of new sites be planned so as to minimize the displacement of housing and the relocation of residents.

FIRE PROTECTION

Policies

It is the City's policy:

1. That the various components of the fire protection/emergency medical services system be continually evaluated and updated by the Fire Department in coordination with other City departments, as fire protection techniques, apparatus, needs and land use patterns change.
2. That the expansion of existing fire stations and the acquisition of new sites be planned and designed to minimize the displacement of housing and relocation of residents.

3. That public education activities concerning the elimination of fire hazards, methods of fire protection and emergency medical service be encouraged.
4. That the existing paramedic program be continually evaluated, updated and improved.
5. That the City intensify its program of fire protection through weed abatement.

PUBLIC SCHOOLS

Policies

It is the City's policy:

1. That the Los Angeles Unified School District's standards and criteria for student travel distance, minimum school size and optimum pupil enrollment be tailored to specific Hollywood area characteristics of land use, street circulation, topography, population densities, number of school age children and availability of vacant land.
2. That the Los Angeles Unified School District be requested to tailor improvements in educational programming, curricula and staffing to the specific social, economic and cultural characteristics of the Community's residents .
3. That all school facilities in the Hollywood Community be constantly reviewed, analyzed and upgraded, in view of the fact that the District contains some of the oldest schools in the City.
4. That due to an absence of vacant land, an after-hours, multi-use concept of school facilities, together with a joint-use concept of other public facilities, be encouraged and promoted.
5. That the expansion of school sites be planned so as to minimize displacement of residents and that, where possible, alternative architectural concepts be developed.
6. That the expansion of school facilities be accommodated on a priority basis and consider the following: existing school size, age of main buildings, current and projected enrollment and projected land uses and population.
7. That the location of new school facilities be based on population densities, number of school age children, projected population, circulation, and existing and future land uses.
8. That all school facilities adjacent to freeways be buffered against visual, noise and air pollution impacts.
9. That educational opportunities for adults be expanded in the community.

LIBRARY

Policies

It is the City's policy:

1. That library facilities, procedures, programs and resources be continually evaluated and tailored to the social, economic and cultural needs of local residents.
2. That, where feasible, bookmobile service to isolated residents be encouraged as a complimentary service of community branch libraries.
3. That the expansion of existing library facilities and the acquisition of new sites be planned and designed to minimize the displacement of housing and relocation of residents.

OTHER PUBLIC FACILITIES

Policies

It is the City's policy:

1. That, where feasible, new power lines be placed underground and that the undergrounding of existing lines be continued and expanded.
2. That new equipment for public facilities be energy efficient.
3. That solar access to adjacent properties be recognized and protected in the construction of public facilities.

SOCIAL SERVICES

Policies

It is the City's policy:

1. That all public and private agencies responsible for the delivery of social services be encouraged to continually evaluate and modify programs as needs change and funds become available.
2. That publicly funded agencies strive to achieve and maintain a high level of awareness and understanding to the ethnic and cultural diversity of the community.

PROGRAMS

These programs establish a framework for guiding development of the Hollywood Community in accordance with the objectives of the Plan . In general, they indicate those public and private actions which should take place during the initial ten years following revision of the Plan. The described actions will require the use of a variety of implementation methods.

PUBLIC IMPROVEMENTS

1. CIRCULATION

To facilitate local traffic circulation, relieve congestion, and provide mobility for all citizens, the following are recommended:

- a. Continued development of the freeway, highway, and street system in conformance with existing and future adopted programs. This should include participation of the City in a regional study focusing on Route 2 capacity increases.
- b. Continued planning of and improvements to the public transportation system for the community, including people-mover systems in high intensity areas as well as the proposed Metro Rail System.
- c. Preparation of a Hollywood Transportation Plan in ordinance form which creates an integrated program of transportation mitigation measures.
- d. Improvement of the Highland/Franklin intersections, including jog elimination either through realignment of Franklin Avenue or through grade separation.
- e. Improvement of Fountain Avenue as an east-west arterial, including jog elimination in the vicinity of Le Conte Junior High School.
- f. Improvement of the Hollywood Boulevard/La Brea Avenue intersection, including jog elimination.
- g. Improvement of the Los Feliz Boulevard/ Western Avenue intersection, including realignment of the curve.
- h. Improvement of Martel Avenue/Vista Street as a north-south arterial, including jog elimination north of Waring Avenue.

2. RECREATION, PARKS AND OPEN SPACE

The City should encourage continuing efforts by County, State, and Federal agencies to acquire vacant lands for publicly owned open space. The Plan encourages creation of the Los Angeles River Greenbelt corridor which would be integrated with existing and proposed parks, bicycle paths, equestrian trails, and scenic routes.

3. OTHER PUBLIC FACILITIES

The development of other public facilities such as fire stations, libraries, and schools should be sequenced and timed to provide a balance between land use and public services at all times. New power lines should be placed underground, and a program for the undergrounding of existing lines should be developed.

PRIVATE PARTICIPATION

Citizen groups are encouraged to undertake private actions for community improvements such as:

1. Initiation by property owners and merchants of programs to increase off-street parking facilities serving adjacent shopping areas.
2. Promoting street tree planting programs in commercial areas as well as residential areas.
3. Sponsoring clean-up and beautification programs to improve the general environment.

HOLLYWOOD REDEVELOPMENT PLAN

A Redevelopment Plan has been adopted by City Council (May 1986) for the area outlined in Map A. The purpose of the Redevelopment Plan is to implement the Community Plan's goals for the revitalization of the Hollywood Center. In order to accomplish these goals the Redevelopment Plan includes several tools, some of which ensure that standards established by the Community Redevelopment Agency (CRA) are carried out.

URBAN DESIGN DISTRICTS

The Hollywood Redevelopment Plan includes three special urban design districts also outlined in Map A. These are (1) the Hollywood Boulevard District (2) the Hollywood Core Transition District and (3) the Franklin Avenue Design District. Objectives defined in these urban design programs shall guide and regulate development for those areas.

REGIONAL CENTER COMMERCIAL DEVELOPMENT

The Redevelopment Plan limits development within the Regional Center Commercial designation to the equivalent of an average floor area ratio (FAR) of 4.5:1 for the entire area so designated. Proposed development in excess of 4.5:1 FAR up to 6:1 FAR may be permitted provided that certain objectives set forth in the Redevelopment Plan subsection 506.2.3 are met. In order to provide incentives for historic and cultural preservation, the unused density from significant structures may be transferred to other development sites.

HOUSING INCENTIVE UNITS

In order to promote revitalization and improvement of residential properties and neighborhoods, the CRA Board may authorize new housing to be developed with more dwelling units per acre than otherwise permitted in the Redevelopment Plan (up to 30% more dwelling units than permitted by that plan) in order to achieve the objectives set forth in Section 505.3 of the Redevelopment Plan. In no

event may such authorization, in and of itself, exceed the maximum number of dwelling units permitted by Zoning.

In general, the Redevelopment Plan establishes a framework for implementing community revitalization activities. All development, including the construction of new buildings and the remodeling and expansion of existing buildings, must conform to the Redevelopment Plan. All building permits must be submitted to and approved by the CRA for development within the Redevelopment Project area.

SPECIFIC PLAN STUDIES

Specific Plan studies are suggested in the following areas:

- East Hollywood Center Study Area/Metro Rail Station area: focusing on the Medical Centers, providing for off-street parking, pedestrian walkways, landscaping, site planning, and mixed use development.
- Industrial Districts: emphasizing the retention and development of the entertainment industry, and including street widening, street improvement and parking, and clustering of complementary uses/services.
- Neighborhood preservation plans: to maintain and enhance the quality of development in, and reinforce the definition of, individual residential neighborhoods.
- Metro Rail Station areas: If development intensities greater than those depicted in this Plan are to be encouraged, station area master plans should be prepared.



6

Table 2-2
Forecast Growth by Subregions and Community Plan Area
 (all numbers are rounded)

These are forecasts and not intended to be minimum or maximum planned land use capacities

*Included in San Pedro and Wilmington Community Plan areas.

Distribution to CPAs based on (1) historic development trends, land values, and development costs; and (2) adjustment of historic trends to reflect the attraction of development to areas in proximity to rail and major bus stations and corridors, mixed-use boulevards, neighborhood districts, community centers, regional centers, and downtown Los Angeles.

City Subregions Map

Subregion	1990 Population	1990- 2010 Population Growth	1990- 2010 Housing Growth (Dwelling Units)	1990-2010 Employment Growth (Jobs)	1990-2010 Commercial Growth (Square feet)
NORTHEAST L.A.					
Boyle Heights	94,580	27,510	6,050	4,800	702,000
Northeast Los Angeles	237,295	60,790	16,520	11,850	1,710,000
Silver Lake-Echo Park	79,095	17,950	5,675	3,025	575,000
Subregional Total	410,970	106,250	28,245	19,675	2,987,000
SOUTH L.A.					
South Central Los Angeles	257,470	57,430	16,010	10,700	1,340,000
Southeast Los Angeles	238,990	49,165	11,440	10,975	1,450,000
Subregional Total	496,460	106,595	27,450	21,675	2,790,000
METRO CENTER					
Hollywood	213,860	43,175	17,610	19,000	3,000,000
Wilshire	271,620	65,525	24,230	39,500	5,575,000
Subregional Total	485,480	108,700	41,840	58,500	8,575,000

Table 2-2 Forecast Growth by Subregi...

SOUTHWEST L.A.					
Palms-Mar Vista-Del Rey	103,705	15,275	6,300	5,275	620,000
Venice	40,040	6,160	2,790	2,245	330,000
West Adams-Baldwin Hills-Leimert	169,395	31,585	10,810	6,750	1,150,000
Westchester-Playa Dey Rey	48,005	14,300	5,875	13,325	1,615,000
Subregional Total	361,145	67,320	25,775	27,595	3,715,000
CENTRAL L.A.					
Central City	22,375	4,655	2,010	61,500	6,515,000
Central City North	19,320	19,520	4,000	7,135	1,145,000
Westlake	106,970	17,070	4,790	16,725	2,230,000
Subregional Total	148,665	41,245	10,800	85,360	9,890,000
SOUTHEAST VALLEY					
North Hollywood	123,410	32,770	12,000	9,125	1,530,000
Sherman Oaks-Studio City-Toluca Lake	68,220	18,640	9,190	9,300	1,415,000
Van Nuys-North Sherman Oaks	136,890	29,085	10,850	16,650	1,945,000
Subregional Total	328,520	80,495	32,040	35,075	4,890,000
NORTHEAST VALLEY					
Arleta-Pacoima	90,960	24,500	4,960	4,525	625,000
Sunland-Tujunga-Lake View Terrace-Shadow Hills	52,920	16,110	5,310	1,925	310,000
Sun Valley	76,575	18,640	4,865	3,425	510,000
Sylmar	59,480	18,210	4,875	3,850	615,000
Subregional Total	279,935	77,460	20,010	13,725	2,060,000
NORTHWEST VALLEY					
Chatsworth-Porter Ranch	79,784	22,575	7,520	8,200	1,200,000
Granada Hills-Knollwood	54,350	7,280	2,300	2,835	390,000

Table 2-2 Forecast Growth by Subregi...

Mission Hills- Panorama City-North Hills	109,070	30,880	9,140	8,250	1,400,000
Northridge	58,865	17,440	5,700	3,675	600,000
Subregional Total	302,069	78,175	24,660	22,960	3,590,000
SOUTHWEST VALLEY					
Canoga Park- Winnetka-Woodland Hills	150,560	41,330	14,350	26,000	3,800,000
Encino-Tarzana	66,485	12,865	5,065	10,225	1,150,000
Reseda-West Van Nuys	89,280	20,400	6,800	6,575	990,000
Subregional Total	306,325	74,595	26,215	42,800	5,940,000
WEST L.A.					
Bel Air-Beverly Crest	19,535	2,020	760	1,200	210,000
Brentwood-Pacific Palisades	54,880	9,740	4,070	4,550	570,000
West Los Angeles	68,060	15,270	7,090	25,500	2,800,000
Westwood	41,295	8,310	3,350	9,900	795,000
Subregional Total	183,770	35,340	15,270	41,150	4,375,000
HARBOR					
Harbor Gateway	36,010	9,940	2,840	5,450	610,000
Port of Los Angeles	*	*	*	*	*
San Pedro	71,970	16,955	6,030	8,350	1,025,000
Wilmington-Harbor City	74,075	18,095	4,990	7,050	2,515,000
Subregional Total	182,055	44,990	13,860	20,850	4,150,000
Total	3,485,400	821,165	266,165	389,365	52,962,000



7

CITY of LOS ANGELES LOCAL POPULATION and HOUSING PROFILE

Hollywood Community Plan Area

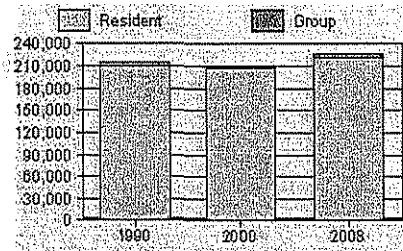
25.19 square mile study area (approx.)

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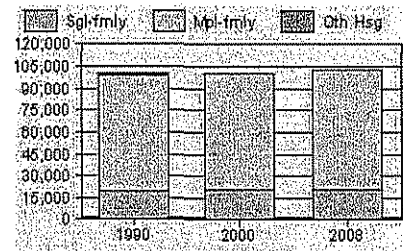
General Population Data

	CENSUS 1990	CENSUS 2000	2008(est.)
TOTAL POPULATION	213,912	210,824	226,112
Annual Growth Rate	n/a	-0.15%	15.03%
Population Density (/sqmi)	8,492	8,369	8,976
Resident Population ¹	210,713	206,996	221,744
Residents' Share of Population	98.50%	98.18%	98.07%
Population in Group Quarters ²	3,200	3,828	4,368
Groups' Share of Population	1.50%	1.82%	1.93%



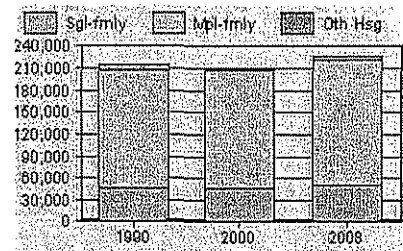
Housing Units

	CENSUS 1990	CENSUS 2000	2008 (est.)
TOTAL HOUSING UNITS	99,943	99,939	102,629
Annual Growth Rate	n/a	-0.00%	5.45%
Housing Density (/sqmi)	3967.37	3967.24	4074.01
Single-family Housing Units ³	19,607	20,369	21,041
Annual Growth Rate	n/a	0.38%	6.71%
Multiple-family Housing Units ⁴	79,267	79,478	81,489
Annual Growth Rate	n/a	0.03%	5.12%
Nonsingle-family Housing Units ⁴	80,336	79,570	81,588
Annual Growth Rate	n/a	-0.10%	5.14%



Housing Occupants (Resident Population) ⁶

	CENSUS 1990	CENSUS 2000	2008 (est.)
TOTAL RESIDENTS	210,713	206,996	221,744
Annual Growth Rate	n/a	-0.18%	14.76%
Residential Population Density	8,365	8,217	8,802
Single-family Unit Occupants ³	45,910	46,279	50,073
Annual Growth Rate	n/a	0.08%	17.07%
Multiple-family Unit Occupants ⁴	162,653	160,491	171,487
Annual Growth Rate	n/a	-0.13%	14.17%
Nonsingle-family Unit Occupants ⁴	164,803	160,717	171,671
Annual Growth Rate	n/a	-0.25%	14.10%



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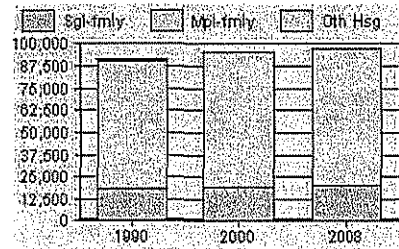


CITY of LOS ANGELES LOCAL STATISTICAL PROFILE

Hollywood Community Plan Area (cont'd)

Housing Occupancy ⁶

	CENSUS 1990	CENSUS 2000	2008 (est.)
ALL OCCUPIED UNITS	99,943	99,939	102,629
Vacancy Rate	8.45%	4.62%	4.51%
Occupied Single-family Units	18,445	19,400	20,067
Vacancy Rate	6.30%	5.00%	4.85%
Occupied Multiple-family Units	72,063	75,838	77,838
Vacancy Rate	10.00%	4.80%	4.69%
Occupied Nonsingle-family Units	73,047	75,921	77,928
Vacancy Rate	9.98%	4.81%	4.70%



Notes

1. Resident Population consists of those who live in housing units in the same area covered by Total Population. It is equal to "Total Population in Households".
2. Group Quarters Population includes persons in student dormitories, military barracks, prisons and health care institutions. Group Quarters and Resident Populations sum to Total Population.
3. Single-family Housing Units (SfHUs) only include detached dwellings.
4. Multiple-family Housing Units (MfHUs) include apartment buildings (both for rent and condominiums), duplexes, artist-in-residence lofts, and attached single-family housing units.
5. Nonsingle-family Housing Units (NsfHUs) add mobile homes, boats, and other living quarters to MfHUs. Its sum with SfHUs yield all living quarters for residents of the census tract. This value is consistent with the definitions used by the Southern California Association of Governments (SCAG) and the California Department of Finance (DoF).
6. The persons who occupy a housing unit are defined as a HOUSEHOLD. Households may consist of one person, one or more families, or a group of unrelated persons.

* All aggregate statistical estimates are subject to round-off error.

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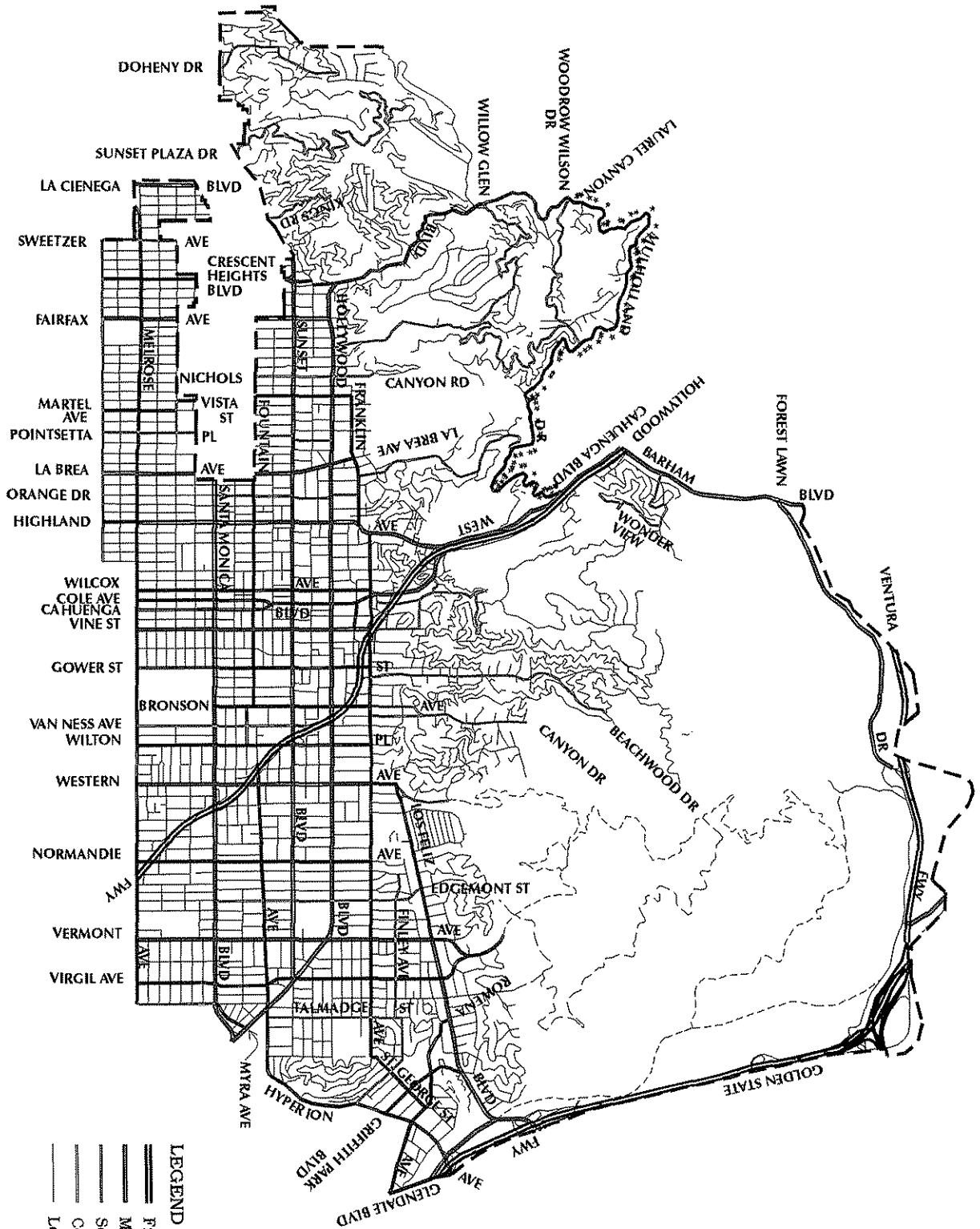
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GENERALIZED CIRCULATION HOLLYWOOD



LEGEND

	Freeway
	Major Highway Class II
	Secondary
	Collector
	Local



Chapter 10

Implementation Programs

PLANS AND POLICIES

ORDINANCES

DEVELOPMENT STANDARDS AND GUIDELINES

STUDIES AND DATA COLLECTION

CAPITAL IMPROVEMENTS

ECONOMIC DEVELOPMENT

PROCEDURAL

INTERAGENCY COORDINATION

DEVELOPMENT REVIEW PROCESSES AND APPROVALS

PLANS AND POLICIES IMPLEMENTATION PROGRAMS

An **implementation program** is an action, procedure, program, or technique that carries out general plan policy. However, not all plan policies can be achieved in any given action, and in relation to any decision, some goals may be more compelling than others. On a decision-by-decision basis, taking into consideration factual circumstances, it is up to the decision makers to decide how to best implement the adopted policies of the general plan in any way which best serves the public health, safety and general welfare.

The General Plan Framework Element is implemented by a comprehensive program of strategies that encompass amendments of existing and preparation of new plans, ordinances, development standards, and design guidelines; conduct of studies and analyses; capital investments; coordination of economic development activities; modification of City procedures and development review and approval processes; and interagency coordination. This section describes each of the implementation programs and identifies the agency(ies) responsible for their implementation, funding sources, and a schedule for their performance. Each program is preceded by the letter "P" and a number which are used as a reference in the preceding chapters of the Framework Element by the pertinent policy(ies) which it implements.

Program implementation is contingent on the availability of adequate funding, which is likely to change over time due to economic conditions, the priorities of Federal and regional governments and funding agencies, and other conditions. The programs should be reviewed periodically and prioritized, where necessary, to reflect funding limitations and the City's objectives. In addition, amounts and sources of funding, initiation dates, responsible agencies and the detailed work scope of programs may be changed without requesting amendments to the General Plan Framework Element.

While in excess of 60 programs are described, the following summarizes the principal programs that are essential in carrying out the policy direction of the Framework Element:

Amendments to the City's community plans guided by the policies and standards contained in the Framework Element consistent with unique community characteristics. (P1)

Amendments of the City's Municipal Code and land use zones guided by the policies and standards contained in the Framework Element to be applied to specific parcels and locations through the community plan amendments as appropriate (P18).

Establishment of design guidelines and standards to improve the quality of development in the City [may be implemented through amendments of the Municipal Code or through guidelines] (P24, P25).

Establishment of a Transportation Improvement Mitigation Plan (TIMP), which defines the transportation improvements necessary to support the land use categories designated by the Framework Element's Long-Range Land Use Diagram (P4).

Establishment and/or updates of comprehensive plans (general plan elements, master plans, and other) for infrastructure and public services to upgrade existing deficiencies and accommodate the needs of future growth (P2).

Continued implementation of the five year Capital Improvement Program (CIP) that is updated annually with the establishment of priorities for improvements in areas targeted for growth as an incentive for development (P31).

Implementation of economic investment strategies and coordination procedures for business retention and attraction and to stimulate development where it is desired (P35)

A program to monitor the status of development activity, capabilities of infrastructure and public services to provide adequate levels of service, and environmental impacts (e.g., air emissions), identifying critical constraints, deficiencies and planned improvements (where appropriate) (P42)

An Annual Report on Growth and Infrastructure that documents the results of the annual monitoring program (P43)

Modification of regulatory, development review, and environmental review procedures to expedite projects that are consistent with the policies and standards of the Framework Element and as prescribed through the amended community plans (P66, P67, P68).

PLANS AND POLICIES

P1

Comprehensively review and amend the community plans as guided by the citywide policies and standards of the General Plan Framework Element. The Framework Element Long-Range Diagram may be amended to reflect the final determinations made through the Community Plan Update process, should the determinations be different from the adopted Framework Element.

- a. Generally, these should include the application of the Framework Element's land use categories to specific parcels, as a refinement of the pattern of uses generally depicted on the Land Use Diagram, and the accommodation of the amount of development forecast for each subregion (as specified in Table 2-2). While the Framework Element's land use categories set a range of development, lesser intensities may be specified to meet specific circumstances. Pertinent incentives for mixed-use development, transit related development, low- and very low-income housing, and

other uses and locations established as districts, centers and boulevards should be identified.

b. Policies and standards for the provision of an adequate transportation system, including:

(1) Specification of a local accessibility plan that:

assesses the mobility and accessibility needs of community residents, including access to work opportunities, unmet transit needs, access to essential services, and access to regional line-haul transit services;

determines the community's current highway and transit accessibility levels;

revises citywide accessibility standards as needed to address unique community problems and issues;

identifies actions to achieve the desired level of accessibility; and

includes measures intended to preserve the existing character of conservation areas while also maintaining and enhancing accessibility within these parts of the City.

(2) definition of neighborhood traffic management strategies to protect residential areas from the intrusion of traffic from nearby developments and regional traffic.

(3) Identification of highway segments by user priority (pedestrian, transit or other vehicle) [see Chapter 5: Urban Form and Neighborhood Design and Chapter 8: Transportation].

c. Open space, recreation/parks, and wildlife conservation needs defined at the neighborhood level.

d. Streetscape and building elements that reflect the characteristics and intentions for community and regional centers, neighborhood districts, and/or mixed-use boulevards.

Responsibility: Department of City Planning, with assistance from the Departments of Transportation and Public Works; adopted by City Council

Funding Source: General Fund and other sources that may be available

Schedule: Initiate comprehensive updates within five years of Framework Element adoption

P2

Amend/revise other City Planning documents to ensure their consistency with the Framework Element. Among these would be:

a. Citywide General Plan Elements, including, but not limited to:

(1) The Housing Element

(2) The Infrastructure Systems Element, incorporating a telecommunications component and watershed management guidelines

(3) The Open Space and Conservation Element, incorporating amended open space standards for the functional definition of open space to include sidewalks in pedestrian-oriented areas, small parks, community gardens, freeway air rights, and any other similar resources incentives and standards for the private implementation of a street tree plan and the public maintenance of street trees planted through private efforts.

b. The Coastal Plan, Consolidated Plan, and other related documents, including possible amendments of Specific Plans to reflect transit corridors and stations where appropriate.

Responsibility: Departments of City Planning, Housing, Transportation Public Works, and Environmental Affairs; adopted by City Council

Funding Source: General Fund and other sources that may be available (e.g., SCAG, ISTEA)

Schedule: Initiate amendments within 18 months of Framework Element adoption

P3

Formulate and periodically update a citywide Transportation Element addressing the following within the context of the regional transportation system:

- a. A transit system, including transit station enhancement programs
- b. Street standards for pedestrian-oriented roadways and transit-oriented roadways. These standards will apply on a case-by-case basis to specific streets as determined during the development of community plan level TIMPs
- c. Paratransit services, taxis, and other privately operated services
- d. Non-motorized transportation alternatives, such as bicycling and walking
- e. The Roadway Classification System
- f. Changes in travel behavior and technology; private sector transportation system management and transportation demand management
- g. Access to major regional employment and other attractors
- h. Transit system security
- i. Mobility and accessibility for senior citizens and disabled persons
- j. Protection of neighborhoods from traffic intrusion
- k. Movement of goods, including intermodal facilities

l. Parking

- m. Mixed-use development as a trip reduction/VMT reduction measure
- n. An investment and funding strategy
- o. Use of electrical energy as an alternative fuel for personal and mass transit

Responsibility: Department of City Planning with the assistance from the Departments of Transportation and Public Works

Funding Source: General Fund

Schedule: Ongoing

P4

Develop Transportation Improvement and Mitigation Plans (TIMPs) for selected districts, centers, and boulevards that will expedite approvals of new development applications and streamline traffic mitigation procedures. These should consider traffic impacts on pedestrian-priority areas and identify mitigation measures, as feasible, that do not restrict pedestrian circulation in those areas. The TIMP should consider which of the following elements should be included:

- a. A transit access plan, which determines the appropriate minimum level of transit accessibility based on an assessment of future conditions, and identifies actions to achieve that level of accessibility;
- b. A pedestrian facilities plan, which identifies pedestrian-oriented roadways and establishes standards for them;
- c. A shared-parking plan, which identifies the locations and sizes of shared-use parking facilities to be used by the various land uses within the districts, centers and boulevards;
- d. A bicycle access plan, which provides for safe and efficient bicycle access to the targeted growth areas;
- e. A vehicular circulation plan, which identifies traffic mitigation measures and provides for adequate internal circulation of vehicles; and
- f. Neighborhood traffic management strategies to prevent traffic from nearby developments and regional traffic growth from intruding upon residential areas.

Responsibility: Department of Transportation, with assistance from City Planning and Department of Public Works

Funding Source: General Fund, ISTEA and other sources

Schedule: Initiate within 24 months of Framework Element adoption

[Click Here to View Figure 10-1](#)
DESIRED MITIGATION MATRIX

P5

Review the policies of ongoing plans, such as the Alameda Corridor, the Port of Los Angeles 2020 Plan, the LAX Master Plan, as well as other major policy efforts, and where needed, resolve any inconsistencies with the General Plan Framework Element.

Responsibility: Departments of City Planning, Transportation, Harbor, Airports, and Public Works

Funding Source: General Fund

Schedule: Ongoing as plans are prepared

P6

As a component of the Transportation Element, LAX Master Plan, or other appropriate planning document, strategies should be defined to provide sufficient commercial and general aviation capacity and adequate access to aviation facilities to serve the passenger and freight air travel needs of the region.

Responsibility: Department of Airports, with assistance from the Departments of City Planning and Transportation

Funding Source: General Fund and other funds through DOA

Schedule: Initiate within 24 months of Framework Element adoption

P7

Formulate/update a wastewater plan to provide sufficient capacity to correct existing deficiencies and meet the needs of future growth. Consider the following actions when developing/updating this Element:

- a. Identify necessary additional wastewater treatment capacity, collection and conveyance facilities, including, but not limited to, a new wastewater treatment facility for the Hyperion Service Area, a replacement sewer for the North Outfall Sewer and the implementation of an ongoing program to identify and promptly rehabilitate and/or replace deteriorated sewers.
- b. Use as the standard for facility planning the hydraulic relief for any part of the collection system that averages over 50 percent capacity and the level of wastewater treatment necessary for compliance with all applicable State and Federal water quality requirements.
- c. Adopt strategies to combat illegal introduction of hazardous substances into the wastewater collection system.

- d. Develop procedures to determine the feasibility of requiring mandatory use of reclaimed water and installation and use of grey water systems for large scale projects, creating flexibility within the wastewater system, and establishing reciprocal agreements with other government agencies.
- e. Develop procedures to maximize the amount of City-treated wastewater which can be reclaimed, including possible groundwater recharge and irrigation.
- f. Identify funding sources and mechanisms for facility improvements
- g. Conduct studies and implement feasible projects that reduce the amount of storm induced flow that enters the wastewater system.

In the formulation of the Element, a computer model and other methods should be used that are capable of estimating flow rates and influent rates into the City's system based upon population and employment forecasts for Los Angeles and the contract cities.

Responsibility: Department of Public Works; City Attorney; Environmental Affairs

Funding Source: Wastewater fees, SCM, Federal funds

Schedule: Initiate within 18 months of Framework Element adoption

P8

Continue to develop and implement the City's stormwater management program in a cost-effective and technically sound manner. The program may include, but will not be limited to the following activities:

- a. Develop and adopt standards for new/redevelopment which address flood hazards and stormwater quality problems via effective and efficient means.
- b. Investigate drainage and water quality inquiries and pursue remedies which reflect cost-effective watershed-based approaches.
- c. Assign the costs of management approaches in a manner that reflects the causes and beneficiaries of problems and solutions.
- d. Research the effectiveness and efficiency of structural and non-structural approaches to managing stormwater.
- e. Educate the public about the interaction between human and natural systems.

Responsibility: Department of Public Works, in cooperation with the County and the U.S. Army Corp. of Engineers

Funding Source: Stormwater Fees

Schedule: Initiate within 18 months of Framework Element adoption

P9

Update existing water resources and distribution plans which address the procurement and maintenance of water supply for Los Angeles and the treatment and distribution of water to consumers. Consider the following actions when updating these plans:

- a. Identify improvements and methods to provide water supply to support development, improve its reliability, and reduce the City's dependency on imported water through feasible reuse. This may include, but not be limited to, water distribution and storage systems, water reclamation projects, including the minimization of overly restrictive and unnecessary conditions for reclaimed water use, and expansion of groundwater extraction and distribution capacity by continuing to recharge local groundwater basins with native runoff and imported supplies (when appropriate).
- b. Conduct feasibility and benefits of developing new, reliable water supply sources, such as water transfers from agricultural users to municipal and industrial users and sea water desalination.
- c. Identify strategies for the protection of water quality by providing water quality improvements to local storage reservoirs, regular flushing, upgrading, or replacement of distribution lines, cleaning tanks, and other appropriate techniques.
- d. Amend water service standards to include water facilities development criteria that minimize the detrimental impacts on ecological systems.
- e. Provide public education programs for water conservation, including the distribution of retrofit kits containing low-flow shower heads and toilet tank displacement bags. Also, continue a rebate program for customers who replace their older, conventional toilets with pre-approved ultra-low-flush models.
- f. Funding sources and mechanisms for facility improvements.
- g. Define of processes and facilitate and obtain public input when evaluating construction options for new and/or expanded water facilities, such as public hearings and/or workshops.

Periodically update the plans by evaluating the City's water system in order to reflect real or projected changes in demand resulting from technological development, population growth and new land use patterns.

Responsibility: LADWP

Funding Source: Water Revenue Fees

Schedule: Initiate within 18 months of Framework Element adoption

P10

Update the solid waste and resources management plans to provide sufficient capacity to meet the needs of future population growth. Consider the following actions when updating these plans:

- a. Identify improvements, including solid waste collection systems and disposal infrastructure, and

recycling efforts to reduce the volume of solid waste generated by the City.

b. The Plan's strategies and procedures should be correlated with the Source Reduction and Recycling Element (a Department of Public Works document), which will be updated annually with full revisions made every five years.

c. Identify funding sources and mechanisms for facility and service improvements

Responsibility: Department of Public Works

Funding Source: General Fund

Schedule: Initiate within 18 months of Framework Element adoption

P11

Update the Police Department protection plans to provide adequate level of service to existing and future residents and uses in the City of Los Angeles.

Responsibility: Los Angeles Police Department

Funding Source: General Fund

Schedule: 1997

P12

Update the Fire Department protection plans to provide adequate level of service to existing and future residents and uses in the City of Los Angeles.

Responsibility: Los Angeles Fire Department

Funding Source: General Fund

Schedule: 1997

P13

Update the Library Master Plan to provide sufficient capacity to correct existing deficiencies as well as meet the needs of future population. Consider the following actions when updating this Element:

a. Identify improvements including, but not limited to, new library facilities, alternatives to "stand-alone facilities" (such as mobile collections and "substations" at transit stations or in mixed-use structures) which encourage greater distribution of library facilities; new methods for acquiring books and equipment; ways to connect library telecommunications services with other City agencies as well as local college and university systems; and ways to identify regional libraries that are appropriate for non-English language collections, consistent with neighborhood needs.

b. Adopt strategies that enhance the viability of joint development and joint-use opportunities with

large commercial projects and the Los Angeles Unified School District, thereby increasing the distribution of library services.

- c. Establish a new City library service standard that is based on the needs and reflects the character of the City.
- d. Identify funding sources and mechanisms for facility improvements, that may include citywide assessments, State and Federal grants, and the solicitation of private donations for collections, audio-visual equipment and computer materials.

Responsibility: Department of Libraries, with assistance from the Information Technology Agency

Funding Source: General Fund

Schedule: 2000

P14

Formulate/update a Recreation Master Plan (a Recreation and Parks Department document) to provide sufficient capacity to correct existing deficiencies as well as meet the needs of future population. Consider the following actions when developing/updating this Element:

- a. Identify improvements to the recreation and park system including additional parklands and recreational programs. Priority should be placed on the identification of improvements for the underserved areas of the City. Both traditional and non-traditional solutions to the expansion of facilities should be considered, including the following:
 - (1) Revise standards that permit the acquisition of parks smaller than five acres, particularly in those communities with the most severe neighborhood park deficiencies;
 - (2) Acquire use, and maintain of properties for recreation and public open space, that are as small as 5,000 square feet in area;
 - (3) Develop community gardens on small lots in residential neighborhoods and commercial areas;
 - (4) Develop active and passive greenways along fixed rail transit lines and utility corridors, as well as for the development of open space along rivers and principal drainages (as depicted on the Citywide Greenways Network Map);
 - (5) Adopt joint use strategies for recreational facilities, wherever appropriate;
 - (6) Require for the inclusion of recreational facilities in multi-family residential and mixed-use development projects; and
 - (7) Adopt strategies to acquire, or work with non-profits to acquire, larger tracts of park land in industrial areas and improve them with community park facilities, e.g., play fields.

- b. Formulate a habitat conservation plan for all regional parks.
- c. Develop procedures for improving recreational facilities to enhance the user safety and security of users.
- d. Provisions for establishing and implementing a parkland acquisition and recreation program to meet current and future park and recreation needs. This may include:
 - (1) Continued use of the Quimby Act (including the in-lieu fees and developer contributions) during the development process as a primary means of parks and recreation acquisition. Fees other than Quimby may be imposed on commercial development to the extent that there is an adequate nexus.
 - (2) Flexible and alternative incentives for developers and other private property owners, such as restructuring dedication and exaction fees and requirements, that facilitate the provision of private land for public use.
 - (3) Procedures that allow residents to request acquisition or use of one or more parcels of excess City-owned land for park or garden use. Requests can be made on a site-specific basis or by general location. The criteria shall include the property's proximity to linear elements of the open space network.
 - (4) State and Federal funding sources.

When formulating/updating the funding program, evaluate whether Quimby fees are adequate to support parkland programming, acquisition, and improvement.

Responsibility: Department of Recreation and Parks, Department of City Planning, Mayor's office, Public Works

Funding Source: State and Federal funds

Schedule: Initiate within 18 months of Framework Element adoption

P15

Formulate and update power system plans to provide sufficient capacity to meet future customer needs in a cost-efficient and reliable manner. The development /update of this Element should utilize the Integrated Resource Plan and consider the following actions:

- a. Identify necessary improvements to the power system including, but not limited to, power supply, transmission, and distribution.
- b. Ensure that power generated within the South Coast Air Basin is in full compliance with Federal, State, and local air quality standards, and establish the optimal level of in-basin power generation.
- c. Continue cost-effective demand side management and energy efficiency programs.
- d. Develop programs to encourage and facilitate the commercialization of electric vehicles and other

forms of electric transportation as a means of improving air quality and aiding with the City's economic development efforts. Develop the infrastructure to support their use.

- e. Ensure that all LADWP customers electric power needs are met in a deregulated power marketplace.
- f. Determine the effect of each new major construction project in the City on its power distribution systems.

When formulating/updating the plan, evaluate customer satisfaction levels with LADWP programs and services and utilize customer input to improve the programs and services.

Responsibility: LADWP

Funding Source: Power Revenue Fund, General Fund

Schedule: 1997

P16

Formulate/update plans to address issues relating to siting and the joint use of facilities. Consider the following actions when developing/updating this Element:

- a. Identify strategies for the expansion of school facilities including:
 - (1) Siting of schools and other community facilities (libraries, parks, and auditoriums) within a transit station, center, or mixed-use area so they can complement each other and make the most efficient use of the land provided for these services.
 - (2) Locating middle schools and high schools where possible, close to transit stations and key centers and mixed-use districts, so students can use the transit system to get to and from school.
 - (3) Encouraging the private redevelopment of existing school sites in the immediate vicinity of transit stations and centers so that the existing site (a low-intensity use) would be replaced by a high-intensity mixed-use development that would incorporate school facilities.
- b. Negotiate and adopt a Memorandum of Understanding between LAUSD and the City regarding the joint use of school facilities such as play fields and park facilities for school purposes, with the City providing liability for outdoor space during non-school hours of operation.
- c. Identify funding sources and mechanisms for facility improvements.

When formulating/updating plans, jointly seek changes in statewide legislation on use standards for schools in charter cities over two million population, and study ways to utilize commercial property for school purposes, where feasible.

Responsibility: Los Angeles Unified School District, with assistance from the Departments of Recreation and cityplanning.lacity.org/cwd/.../10.htm

Parks and City Planning

Funding Source: State and local funds

Schedule: Initiate within 18 months of Framework Element adoption

P17

Formulate/update street lighting plans to develop an inventory of nighttime visibility requirements for all streets in Los Angeles. Consider the following actions when developing/updating this Element:

- a. Correlate needs for nighttime vision with approved standards;
- b. Correlate existing conditions with the established needs;
- c. Establish the long-term objectives for improvement of lighting consistent with City street improvement policies; and
- d. Define and promote the Street Lighting Equipment Selection Policy to assure due process and maximum choice of communities for special street light equipment subject to their willingness to pay. Replace standard street lights and develop strategies to preserve historic street lights while replacing their original lumens with more energy efficient lights.
- e. Participate in national and international studies and programs relating to light use, management and control.
- f. Develop a data base of recommendations and model regulations which can normally be applied in various communities within Los Angeles.
- g. Develop recommendations for financing and enforcing regulations for control of obtrusive light.

When formulating/updating plans, determine appropriate regulations for private lighting to minimize or eliminate light pollution, light trespass and glare (obtrusive light).

Responsibility: Department of Public Works

Funding Source: Street Lighting Assessment Fund

Schedule: Ongoing

ORDINANCES**P18**

Amend the Zoning Ordinance to implement the policies and standards of the General Plan Framework Element. The revisions provide tools needed to which are described below and are representative of the actions that may be taken.

- a. Revise land use and density classifications, zoning maps, and pertinent development standards (e.g. parking standards, design of multi-family units, pedestrian districts, development transitions, and other) to reflect the concepts contained in the Framework Element, appropriately applied through amendments of the community plans consistent with community characteristics.
- b. Establish incentives to stimulate the types of use desired (e.g., mixed-use, community facilities in centers, districts, and boulevards, and other) and development in appropriate selected targeted growth areas as defined in the community plans, such as density bonuses for mixed-use development, parking in proximity to transit stations and transit corridors, "by-right" entitlements with administrative review and approval for traffic or other necessary studies and mitigation, and other.
- c. Permit the incorporation of revenue-generating recreation facilities into communities, where such uses are feasible and where levying fees would not place an undue hardship on the users.
- d. Allow commercial structures and multi-family dwelling units destroyed by natural catastrophes to be re-constructed to their pre-existing use and density in any areas where permitted densities may be reduced by amendments to the community plans.
- e. Establish reasonable defensible space design requirements that will help ensure maximum visibility and security for entrances, pathways, and corridors, as well as open space (both public and private) and parking lots or structures. The code and design review amendments should address landscaping and lighting in addition to site design.

Responsibility: Department of City Planning, with assistance from the Departments of Transportation and Public Works and the Community Redevelopment Agency and the Los Angeles Unified School District

Funding Source: General Fund and State funds

Schedule: Within one year of General Plan Framework Element adoption and ongoing, as necessary

P19

Modify appropriate ordinances to reflect the provisions of the Framework Element and incorporate incentives for the provision of private land for parks and open space, such as restructuring dedication and exaction fees and requirements.

Responsibility: Department of City Planning, with assistance from Departments of Recreation and Parks and Environmental Affairs

Funding Source: General Fund

Schedule: Initiate within 18 months of Framework Element adoption

P20

Continue to implement the Transfers of Development Rights Ordinance and use it under appropriate circumstances as an incentive to encourage private property owners to provide land for parks and open space.

Responsibility: Department of City Planning, with assistance from The Department of Recreation and Parks

Funding Source: General Fund

Schedule: Ongoing

P21

Modify City ordinances where necessary, to reflect the provisions of the Framework Element and respond to the needs of identified target industries.

Responsibility: Departments of City Planning, Public Works, Transportation, and any other appropriate department

Funding Source: General Fund

Schedule: Initiate within 18 months of Framework Element adoption, and ongoing as needed

P22

Modify, as necessary, the Building Code to facilitate and guide the development of mixed-use structures, including the possible inclusion of school space, libraries, and other community facilities in such structures.

Responsibility: Department of City Planning, Building and Safety

Funding Source: State and Local

Schedule: Initiate within 18 months of Framework Element adoption

P23

Formulate an Affordable Housing Ordinance to encourage the production of affordable housing, to preserve existing housing capacity in the City, and to reduce the potential for the overconcentration of affordable housing units in particular parts of the City.

Responsibility: Departments of City Planning and Housing

Funding Source: General Fund

Schedule: Ongoing

DEVELOPMENT STANDARDS AND GUIDELINES

The following may be implemented through (1) guidelines to be adopted by the City Planning Commission (CPC) and/or Council, or (2) codification (ordinances) enacted by the City Council. The method of implementation

should be determined after Framework Element adoption.

P24

Formulate *citywide* development standards that:

a. Enhance and/or conserve the appearance and functionality of residential and commercial areas, including appropriate applications for mixed-use structures that integrate housing with commercial uses. The following indicates a preliminary list of standards that may be considered.

- (1) Encourage and facilitate the assembly of small lots for higher-density housing or mixed- use
- (2) Encourage mixed-use development to locate on lots with side street access so that traffic flows and the pedestrian-oriented street frontage can be uninterrupted.
- (3) Provide incentives for a mix of residential unit sizes in the R3, R4 and R5 zones through the replacement of the habitable room-based density range by a single density.
- (4) Separate the measurement of intensity (floor area ratio/FAR) from building coverage and do not exclude required yards from the permitted FAR.
- (5) Increase per-unit on-site space requirement for all multi-family residential buildings.
- (6) Require transitional heights and buffers between higher-density housing and single-family homes.
- (7) Provide landscape options: more but smaller size (e.g., 15 gallon) trees in lieu of fewer larger size (e.g., 24-inch box) trees.
- (8) Protect residential areas from the intrusion of "through traffic" by implementing neighborhood traffic management strategies.
- (9) Require street trees at the minimum spacing permitted by the Division of Street Trees.
- (10) Wherever possible, along secondary and major highways, require driveway access to buildings from side streets or alleys to minimize interference with pedestrian access and vehicular movement.
- (11) For parking structures, screen architecturally or with landscaping, locate no more than one level above grade in residential areas, and screen direct views of headlights/building lights from building exterior.

b. Enhance the appearance and function of *public infrastructure* and development, considering:

- (1) Sidewalk improvement standards; location, appropriate width, species and spacing of trees as well as street furniture and street lighting.
- (2) Revise street tree standards, including species and placement to enhance

pedestrian- oriented districts and centers with a continuous tree canopy. Broadleaf evergreen and deciduous trees should be used whenever feasible.

(3) Revise street tree maintenance and removal standards.

Responsibility: Departments of City Planning, Transportation, and Public Works

Funding Source: General Fund, Street Lighting Assessment Fund

Schedule: Initiate within 18 months of Framework Element adoption

P25

Formulate local standards for designated pedestrian-oriented districts (neighborhood districts, community centers, some regional centers, and some mixed-use corridors) to account for each area's unique characteristics. Examples of standards include

- a. Location of building walls along streets: e.g., "build-to" lines, setback lines, etc.
- b. Building heights and bulk: e.g., building-height-to-street relationships, lot coverage, etc.
- d. Location of pedestrian entrances: e.g., ground level, direct sidewalk, courtyard access, compliance with American's with Disabilities Act.
- e. Transparency of exterior building walls: e.g., display windows composed of non-reflective glass.
- f. Openings in exterior building walls for vehicular access: vehicular access provided from side streets or alleys if feasible as determined by the Department of Transportation.
- g. Other openings in exterior building walls: openings for plazas, courtyards, outdoor dining, seating, water features, open air vending or display areas.

Responsibility: Department of City Planning, with assistance from the Departments of Transportation and Public Works

Funding Source: General Fund

Schedule: Initiate within 18 months of Framework Element adoption

STUDIES AND DATA COLLECTION

P26

Conduct development and land use studies to:

- a. Locate and determine the site characteristics of all the City-owned surplus land;
- b. Determine and zone surplus land, if appropriate, for commercial, industrial, residential, public or institutional use; and

c. Establish a comprehensive database of available industrial facilities and development sites within Los Angeles, which is updated periodically and indicates the availability, location, acreage, and configuration of each site.

Responsibility: General Services assisted by CRA, and Department of City Planning

Funding Source: General Fund, as funding permits

Schedule: Ongoing

P27

Conduct a study to identify and propose appropriate recommendations to seek to eliminate, where feasible, governmental mandates that represent unreasonable barriers to future economic development in the City.

Responsibility: CRA, CDD, or Department of City Planning

Funding Source: General Fund, as funding permits

Schedule: Initiate within 24 months of Framework Element adoption

P28 Review City job training programs to see if they are in alignment with realistic and appropriate job training needs in the City. Change and enhance the job training curricula in response to this review.

Responsibility: CRA, or CDD

Funding Source: General Fund, as funding permits

Schedule: Initiate within 24 months of Framework Element adoption

P29

Assess the 20-year projections of affordable housing needs by type and cost within each City Subregion and institute a monitoring system to evaluate housing production and forecast needs every five years.

Responsibility: Departments of City Planning and Housing

Funding Source: General Fund or other available funds

Schedule: Initiate within 18 months of Framework Element adoption

P30

Prepare cost-benefit analysis for tree pruning, maintenance, removal and replacement. Include as benefit, factors for heat island mitigation, water conservation, reduction of waste.

Responsibility: Department of Public Works

Funding Source: Grants

Schedule: Initiate within 24 months of Framework Element adoption

CAPITAL IMPROVEMENTS

P31

Continue to implement a five-year Capital Improvements Program (CIP) that is updated annually. This program will:

- a. Address the improvement of infrastructure and services and should utilize information obtained from the City's Monitoring Program to help determine those projects that should be included in the CIP (refer to program P42 for a discussion of the Monitoring Program).
- b. Provide for the acquisition, design, construction, maintenance, and replacement of buildings and facilities for which the City is responsible.
- c. Allocate funds for the design and construction of public streetscape improvements intended to enhance the City's neighborhood districts and community centers.
- d. Pursue transportation system management (TSM) measures in the 13 congested corridors defined in Figure 10-1.
- e. Continue to implement ATSAC and Smart Corridor programs throughout the City, reaching 100 percent of all City streets by the year 2010.
- f. Prioritize projects such that infrastructure and services are provided first in those areas in which growth is targeted and where severe deficiencies exist.
- g. Address the infrastructure needs of target industries, thereby supporting the City's economic development goals.

Responsibility: Departments of Public Works, Transportation, and City Planning, CAO, and other appropriate agencies

Funding Source: General Fund, Prop A, Prop C, ISTEPA, TSM Program, gas tax and other sources, as available

Schedule: Every year with five year projections.

P32

Fund and implement streetscape improvements by taking the following actions:

- a. Establish a priority funding program for streetscape improvements in districts, centers, and

boulevards.

b. Develop funding linkages between open space needs and other priority issues, such as linking streetscape improvements with transit-related concerns, or other externally-funded programs focused on small-scale, local concerns.

c. Work with the Los Angeles Department of Public Works to improve the visual appearance of streets by:

- (1) Permitting trees to establish full canopies; and
- (2) Continuing to underground utilities consistent with the City's guidelines and rules.

Responsibility: Departments of City Planning, Transportation, Public Works, and Water and Power

Funding Source: General Fund or external funding sources (e.g., Federal Department of Transportation Intermodal Surface Transportation Efficiency Act [ISTEA] funds)

Schedule: Ongoing

P33

Continue operating and refining the existing computer based Pavement Management System, which develops models to predict current pavement life cycle for each street segment in the City's 6500 mile street system. Based on these models, optimum maintenance strategies will be developed to preserve the street system to the maximum extent possible permitted by the resources allocated for this purpose.

Responsibility: Department of Public Works

Funding Source: State Gas Tax, Prop. C

Schedule: Ongoing

P34

Continue utilizing a variety of cost effective maintenance techniques to more properly maintain streets in a perpetual good to excellent condition, with an emphasis on providing major maintenance in the form of full-width resurfacing prior to a street segment suffering more than 15 percent base failure, which would require significantly costlier reconstruction work.

Responsibility: Department of Public Works

Funding Source: State Gas Tax

Schedule: Ongoing, as funding permits

ECONOMIC DEVELOPMENT

P35

Establish a comprehensive Economic Development Strategy and a pro-active Business Attraction and Retention Program that will:

- a. Coordinate the City's economic development functions and business support services to provide better service delivery and eliminate duplicative functions.
- b. Include methods to maximize the use of non-local financial incentive programs such as those provided by the State and Federal government.
- c. Actively promote the information resources available through the City's various departments (e.g., the export assistance program and foreign trade zone program), and effectively coordinate the provision of the City's technical assistance through the City's centralized economic development function.
- d. Identify local labor force resources and emerging industries.
- e. Actively assist firms in understanding and complying with State and Federal regulations.
- f. Use the Regional Comprehensive Plan and Guide (RCPG) developed by the Southern California Association of Governments (SCAG) as a guide for identifying target industries.
- g. Direct available economic development resources to targeted locations within the City and to specific emerging industrial sectors.

Responsibility: To be determined by Mayor and Council

Funding Source: General Fund and other funding sources (e.g. and the Federal government)

Schedule: Initiate within 24 months of Framework Element adoption

P36

Develop a series of economic incentives to accomplish the following:

- a. Obtain revenue, support development, and provide adequate infrastructure and services, by using the City's budget and financing process. Techniques such as assessment and improvement districts, revenue increment financing, tax exempt bond financing, Federal grants, and development credit/fees shall be examined for their appropriateness.
- b. Achieve the preferred types of growth in desired locations by utilizing techniques such as Redevelopment, Neighborhood Recovery, Empowerment Zones and Enterprise Communities, housing development loans and grants, and the formation of services or assessment districts.
- c. Create regionally competitive and modern industrial sites to maintain and enhance a core manufacturing base. Additionally, commit City resources, where appropriate, to support programs such as the preparation of necessary environmental analysis, environmental remediation, site acquisition and aggregation, and increased police protection.
- d. Serve firms whose individual funding requirements are less than the amounts traditionally

addressed by this source by using appropriate "packaging" of loan applications for Industrial Development Bond (IDB) assistance.

Responsibility: To be determined by Mayor and City Council

Funding Source: Various sources

Schedule: Ongoing

P37

Establish development facilitation programs/strategies and joint partnerships to accomplish the following:

- a. Form partnerships, when feasible, to jointly pursue large scale development projects. These partnerships may be used to stimulate development in key areas targeted for growth, such as at rail transit stations.
- b. Provide a range of opportunities for emerging industrial companies to locate within the City's industrial areas by undertaking industrial development initiatives such as site assembly, site preparation, incubator development, marketing financial incentives in targeted areas, and appropriate job training and infrastructure improvements.
- c. Focus economic development resources on industrial preservation zones and policy linked areas.
- d. Develop community-level transit accessibility plans by seeking maximum opportunities for entrepreneurial services and other private-sector initiatives.
- e. Offer a portfolio of business assistance programs, services, and pricing options related to the provision of electricity that is based on customer needs and input.

Responsibility: Mayor's Office, Department of Community Development, and/or Community Redevelopment Agency, LADWP

Funding Source: General Fund, Power Revenue Fund, and other sources, as available

Schedule: As required

P38

Initiate a series of district and center demonstration projects which employ pro-active measures for both attracting development to the centers and improving the physical and social environments of the centers and surrounding neighborhoods. These demonstration projects could involve public improvements, transit services, financial incentives and other economic development measures.

Responsibility: Council Offices, Mayor's Office, CRA, MTA and other relevant department

Funding Source: General Fund

Schedule: Initiate process within 18 months of Framework Element adoption

P39

Promote the commercialization of electric vehicles and other forms of electric transportation as a means of improving air quality and economic development.

Responsibility: LADWP

Funding Source: Power Revenue Fund

Schedule: Ongoing

P40

Market existing foreign trade zone benefits and investigate creation of additional sites for the City's existing foreign trade zone, facilitation of permit processing, provision of further regulatory relief, and other appropriate actions to facilitate the operations of the Port of Los Angeles and Los Angeles International Airport.

Responsibility: Departments of the Harbor and Airport

Funding Source: General Fund, as funding permits

Schedule: Ongoing

P41

Develop an Entrepreneurial Transit Opportunities program to encourage the development of community-based services such as jitneys and/or shuttles that would be run by owner-operators.

Responsibility: Department of Transportation

Funding Source: General Fund, Prop A, Prop C, private sector participation

Schedule: Initiate process within 18 months of Framework Element adoption

PROCEDURAL**P42**

Establish a Monitoring Program to accomplish the following

- a. Assess the status of development activity and supporting infrastructure and public services within the City of Los Angeles. The data that are compiled can function as indicators of (a) the rate of population growth, development activity, and other factors that result in demands for transportation, infrastructure, and services; (b) location and type of infrastructure investments and improvements; and (c) changes to the citywide environmental conditions and impacts documented in the Framework Element environmental database and the Environmental Impact Report.

- b. Assess transportation conditions and determine the City's progress toward attainment of citywide transportation objectives.
- c. Determine the progress of the Los Angeles County Sanitation District 2010 Master Facilities Program and any other capital improvement projects which could affect their ability to collect City wastewater and provide full secondary treatment for that wastewater.
- d. Identify existing or potential constraints or deficiencies of other infrastructure in meeting existing and projected demand.
- e. Identify, based on consultation with the LAUSD, the surplus and/or deficit of classroom seats.

Responsibility: Department of City Planning, LADWP, Public Works, Fire and Police

Funding Source: General Fund, Power Revenue Fund, development fees, Sewer Construction/Maintenance (SCM), Federal funds and other funding sources

Schedule: Within one year of Framework Element adoption

P43

Prepare an Annual Report on Growth and Infrastructure based on the results of the Monitoring Program, which will be published at the end of each fiscal year and shall include information such as population estimates and an inventory of new development. This report is intended to provide City staff, the City Council, and service providers with information that can facilitate the programming and funding of capital improvements and services. Additionally, this report will inform the general plan amendment process. Information shall be documented by relevant geographic boundaries, such as service areas, Community Plan Areas, or City Council Districts.

Responsibility: Department of City Planning in consultation with City departments

Funding Source: General Fund and other appropriate sources

Schedule: At the end of the fiscal year

P44

Establish a citywide transportation database to be used in the Monitoring Program. The database should include:

- a. Measures of accessibility at the community plan area level;
- b. Measures of mobility (including levels of service, mode split, and vehicle occupancy) at the screenline, community plan area, and citywide levels; and
- c. Measures of plan development (such as TIMP adoption for targeted growth areas and community-level accessibility plan adoption) at the citywide level.

Responsibility: Departments of City Planning and Transportation

Funding Source: General Fund

Schedule: Initiate within 24 months of Framework Element adoption

P45

Closely monitor Federal and State legislative mandates which may restrict the Port and the Airport's cargo-handling capacity and passenger-handling capacity; address such mandates through appropriate lobbying efforts.

Responsibility: Departments of Airports and Harbor

Funding Source: General Fund

Schedule: Ongoing

P46

Urge Caltrans, SCAG, and the LACMTA to consider using reversible HOV lanes on freeways as a part of the countywide HOV plan. Corridors where reversible HOV lanes should be considered include:

- a. The Golden State Freeway (I-5), north of SR-170;
- b. The Hollywood Freeway (US-101 and SR-170), between Downtown Los Angeles and I-5;
- c. The San Diego Freeway (I-405), between I-10 and I-5; and
- d. The Ventura Freeway (US-101), west of I-405.

Responsibility: Departments of City Planning and Transportation

Funding Source: General Fund

Schedule: Initiate within 18 months of Framework Element adoption

P47

Expand the telecommuting program for municipal employees, where and when appropriate.

Responsibility: City Council, Department of Personnel

Funding Source: General Fund

Schedule: Ongoing

P48

Establish a simple, timely program (e.g. a maximum three months approval time) by which residents of any size area can request a standardized assessment district for the installation and maintenance of street trees or pedestrian-scale street lights.

Responsibility: Departments of City Planning and Public Works

Funding Source: General Fund

Schedule: Initiate within 24 months of Framework Element adoption

P49

Periodically evaluate the fee structures, both in terms of monetary costs to developers and administrative complexity, in relation to other cities in the region. Where appropriate, revise existing fee structures. Additionally, periodically evaluate the fee collection schedules for infrastructure maintenance and improvements.

Responsibility: Departments of City Planning, Water and Power, Public Works, Transportation, Building, and other appropriate departments

Funding Source: General Fund

Schedule: Ongoing

P50

Take the following procedural actions in relation to the City's parks and open space resources

- a. Provide for the installation of street trees to maintain open space corridors by developing a system of standards and incentives for private implementation of a street tree plan, including commitments of public maintenance for street trees planted through private efforts.
- b. Provide tax benefits for land gifts to the City (such as riverfront properties).

Responsibility: Departments of City Planning, Recreation and Parks, and Public Works

Funding Source: General Fund

Schedule: Initiate within 24 months of Framework Element adoption

P51

Combine City resources with private sector funds to provide financing for new transportation facilities and services, in order to leverage the amount of State and Federal monies available for transportation projects.

Responsibility: Departments of City Planning and Transportation

Funding Source: General Fund, Prop A, Prop C, L.A. County, private sector participation

Schedule: Ongoing

INTERAGENCY COORDINATION

P52

Cooperate with regional agencies such as the South Coast Air Quality Management District and others to establish regional Transportation Control Measures, and other transportation demand management strategies, since many of the most effective measures to reduce vehicle trips require regional implementation. Consider the following potential strategies in this effort:

- a. Merchant transportation incentives;
- b. Congestion pricing;
- c. Parking pricing;
- d. Park-and-ride shuttle services to centers and special events;
- e. Residential-based Transportation Management Organizations;
- f. Enhanced service and improved safety and comfort of local transit;
- g. Preferential parking; and
- h. Bicycle and pedestrian lanes and bicycle storage facilities construction.

Responsibility: Departments of City Planning and Transportation, EAD

Funding Source: General Fund

Schedule: Ongoing

P53

Continue to encourage the grade separation of railroad crossings along the Alameda Corridor to improve the movement of freight.

Responsibility: Departments of Transportation, City Planning, Public Works, Caltrans, Public Utilities Commission

Funding Source: Alameda Corridor Program funds

Schedule: Ongoing

P54

Enhance the relationship among City departments and agencies and between City and non-City entities by taking the following actions:

- a. Continue to assure coordination of various City planning efforts related to growth, infrastructure, and service provision.
- b. Maintain the dialogue between the City and organizations and public agencies that directly

provide it services and/or indirectly impact growth and development within Los Angeles, by establishing a mechanism that facilitates regular meetings between these entities.

c. Create a strategic planning capability among the Department of Public Works, the CAO, the City Planning Department and other appropriate agencies to provide a forum in which to review key issues and strategies related to growth and to coordinate the provision of adequate services, assess existing conditions and future needs, develop strategies for the most effective use of available funds, and develop additional funding sources.

d. Prepare proposal for eliminating or reducing existing infrastructure deficiencies.

Responsibility: Department of City Planning and other relevant departments and agencies

Funding Source: General Fund and development fees

Schedule: Within one year of Framework Element adoption

P55

Work cooperatively with the Sheriff's Department, State law enforcement agencies, the National Guard, and the Police Departments of the surrounding jurisdictions in order to maintain and improve mutual assistance agreements.

Responsibility: Los Angeles Police Department

Funding Source: General Fund

Schedule: Ongoing

P56

Work cooperatively with the Fire Departments of the surrounding jurisdictions, LAX, and the Port, as well as with State agencies that deal with fire suppression and emergency medical services, in order to maintain and improve mutual aid agreements.

Responsibility: Los Angeles Fire Department

Funding Source: General Fund

Schedule: Ongoing

P57

Expand the joint use of community-serving facilities, such as public libraries, wherever possible.

Responsibility: Department of Libraries; Los Angeles Unified School District

Funding Source: State and Local

Schedule: 1998

P58

Work with adjacent cities and the appropriate State and County agencies, such as the California Coastal Commission, to ensure that the City's beaches, and any facilities such as bike paths that are built on or near them, are integrated into the Citywide Greenways Network.

Responsibility: Department of City Planning; California Coastal Commission; the County of Los Angeles; adjacent jurisdictions; any other appropriate agency

Funding Source: General Fund

Schedule: Ongoing

P59

Work with the Trust for Public Lands, the Santa Monica Mountains Conservancy, and other non-profit organizations to purchase park land along corridors identified in the Citywide Greenways Network Map, with priority to those areas of the City with the most severe neighborhood park deficiencies. These actions shall be taken in addition to acquiring land unilaterally.

Responsibility: Department of Recreation and Parks, with assistance from the Department of City Planning, Environmental Affairs

Funding Source: State/Federal funds

Schedule: Ongoing, as funding is available

P60

Work with the Army Corps of Engineers, Los Angeles Department of Public Works, and Los Angeles County to restore the Los Angeles River to a more natural State, while at the same time maintaining its essential flood control function. To achieve this objective, take the following actions:

- a. Initiate modest projects at strategic locations along the Los Angeles River to begin restoration and enhance access to bike paths and other elements of the Open Space Network.
- b. Locate these projects at sites that are already in the best condition (and opportunistically as other sites become available).
- c. Consider establishing a State recognized river authority for the Los Angeles River as a means to efficiently implement river enhancements.

Responsibility: Department of Recreation and Parks, in cooperation with Environmental Affairs Department (EAD), Public Works, Army Corp. of Engineers, and Los Angeles County

Funding Source: General Fund

Schedule: Ongoing

P61

Work closely with other City departments to ensure that their facilities are energy efficient and to develop the infrastructure to support an electric vehicle future.

Responsibility: LADWP

Funding Source: Power Revenue Fund

Schedule: Ongoing

P62

Coordinate energy related business assistance activities with other City departments.

Responsibility: LADWP

Funding Source: Power Revenue Fund

Schedule: Ongoing

P63

Coordinate water related conservation and lobbying efforts by:

- a. Supporting Federal and State legislation that protects existing and future water resources;
- b. Participating with other agencies to promote effective water conservation programs throughout Southern California; and
- c. Working through the Metropolitan Water District on all non-local water issues and actions.
- d. Supporting legislation and regulation that promotes the use of reclaimed wastewater

Responsibility: LADWP

Funding Source: Water Revenue fees

Schedule: Ongoing

P64

Prepare for emergencies by:

- a. Maintaining and updating the City's Emergency Management Plan, which among other things, serves to coordinate the emergency planning efforts of Los Angeles' Police, Fire, Water and

Power, and Public Works departments.

- b. Maintaining an emergency operations plan, as part of the Citywide Emergency Management Plan, that provides for reciprocal assistance during an emergency.

Responsibility: Department of Public Works, Police, Fire, Information Technology Agency (ITA), CAO, Emergency Operations Board

Funding Source: Wastewater fees, General Fund

Schedule: Ongoing

P65

Coordinate stormwater management activities with other agencies to promote water shed based approaches such as the Santa Monica Bay Restoration Project.

Responsibility: Department of Public Works, with other City departments; L.A. County; Regional Water Quality Control Board and Army Corps of Engineers

Funding Source: Stormwater Fees

Schedule: Ongoing

DEVELOPMENT REVIEW PROCESSES AND APPROVALS

P66

During the development process:

- a. Continue to require developers of new projects to pay fees for, or construct improvements to, the storm drain or flood control systems attributable to their projects.
- b. Offer developers and other private property owners flexible, alternative incentives to provide private land for public use, where permitted by law. The incentives include, but are not limited to:
 - (1) Tax benefits for the gift of land to the City;
 - (2) Transfers of development rights;
 - (3) Restructuring of dedication and exaction fees and requirements; and
 - (4) Giving credit for the provision of private landscaped plazas and other open spaces that are readily accessible to the public.

Responsibility: Departments of Recreation and Parks, City Planning, Transportation, Public Works

Funding Source: General Fund

Schedule: Ongoing

P67

Create expedited development processes and permitting assistance measures that:

- a. Are consistent with the policies and standards of the General Plan Framework Element;
- b. Assign a planning staff person to take projects through the City approval process for development projects located in a centers, district, or mixed-use boulevard or on a transit corridor;
- c. Streamline the impact analysis requirements for new development applications;
- d. Create public service centers which cluster departments that provide public services (i.e. water/power, planning, zoning, building and safety, etc.). Locate service centers throughout the City; and
- e. Improve the permitting center to facilitate the application process for and the issuance of all City-required development permits. Where funding permits, changes to the permitting center shall include:
 - (1) The assignment of a project manager to each applicant project to assist the applicants in securing permits required by other governmental agencies.
 - (2) The installation of a computer software system to quickly estimate the total development fee which an applicant for a specific project will be required to pay.

Responsibility: Departments of City Planning, Public Works, Transportation, and Building and Safety

Funding Source: General Fund and development fees

Schedule: Initiate within 18 months of Framework Element adoption and thereafter, ongoing

P68

Maximize the environmental review process' efficiency through:

- a. The use of master environmental databases, a CEQA Manual and the General Plan Framework Element database, where appropriate;
- b. Reliance on the General Plan Framework Element EIR, and/or Community Plan EIRs, either in total or in part, as the environmental assessment for development projects in targeted growth areas, centers and corridors, whenever possible.
- c. Use of a standardize environmental assessment criteria for public and private development projects undergoing environmental review, as appropriate.

Responsibility: Departments of City Planning, Transportation, Public Works, Environmental Affairs

Funding Source: General Fund and Developer Fees

Schedule: Ongoing

P69

Modify parking requirements and trip generation factors (or apply credits), based on reduced demand, for development projects in the following locations:

- a. Center, district, or mixed-use boulevard (consistent with the Transportation Improvement and Mitigation Program for each center, district, or mixed-use boulevard).
- b. Projects within 1,500 feet of fixed rail transit stations.
- c. Projects within 750 feet of major bus route intersections.
- d. Vertical mixed development projects regardless of location.
- e. Affordable housing projects in appropriate locations.

Responsibility: Departments of City Planning and Transportation

Funding Source: General Fund

Schedule: Initiate within 18 months of Framework Element adoption

P70

Formulate or modify appropriate ordinances, including consideration of a mountain overlay zone, to preserve private land with open space characteristics to the extent feasible. Consider incorporating the following:

- a. Appropriate sections of the adopted Hillside, Oak Tree, Mountain Fire Protection and Slope Density ordinances;
- b. Provisions for wildlife corridors; watershed management and natural landscape preservation;
- c. Transportation Improvement and Mitigation Plans for hillside areas;
- d. Development standards for new construction, and
- e. Provisions to facilitate land donations to non-profit organizations such as the Santa Monica Mountains Conservancy.

Responsibility: Department of City Planning

Funding Source: General Fund

Schedule: Initiate within 24 months of Framework Element adoption

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6/28/2010

Chapter 3. Implementation Programs

End of Document

Chapter 1

The General Plan System

This chapter describes the Citywide General Plan Framework Element, an element of the City of Los Angeles General Plan, and the General Plan System for the City of Los Angeles, which includes the Framework Element, a Land Use Element comprised of 35 community plans, twelve citywide elements which address various citywide topics, a Monitoring System, and an Annual Report on Growth and Infrastructure.

The General Plan Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It is the product of numerous public workshops and events, advisory committee meetings, and economic, land use, and environmental studies conducted by a team of city planners, engineers, and consultants.

It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. Framework Element strategies build upon the historic physical form and character of Los Angeles in a manner that enhances, rather than degrades, the City's and region's environmental resources and quality of life for residents. The Framework Element's strategies are based on the following principles:

Economic Opportunity

Economic opportunity in all communities is essential to improve social equity and maintain the quality of life. A business-friendly environment is a requirement for protecting current jobs and developing new ones.

Equity

Equity means that public resources are invested on the basis of priority community needs. Decisions concerning the location and level of public investment necessary to meet citywide needs should be made in ways that do not unfairly impact any one single community.

Environmental Quality

Environmental quality means cleaner air, enhanced mobility, and accessible open space, and is a foundation for attracting and retaining economic investment and improving neighborhood liveability. Limited resources should be used wisely so that the needs of today can be met without compromising the ability of future generations to meet the needs of tomorrow.

Strategic Investment

Strategic investment in infrastructure systems and public facilities and services is important to ensure mobility and access to jobs, and to maintain environmental quality. Public resources should be invested in ways that leverage private capital to produce the greatest economic benefit for all residents of the City.

Clear and Consistent Rules

Clear and consistent rules governing both public and private sector development are necessary to expand economic opportunity and protect the character of residential neighborhoods. These rules should provide

predictability to anyone who develops property, including small businesses and individual homeowners.

Effective Implementation

Effective implementation is comprehensive, continuing, and responsive to changing circumstances and needs. Communities and neighborhoods must be engaged in a participatory process of planning for their futures within a citywide context.

These principles shape and form the Framework Element's goals, objectives, policies, and implementation programs in the following chapters: Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Transportation, and Infrastructure and Public Services.

Economic opportunity is addressed by the Framework Element's Economic Development Chapter, which sets forth policies intended to help generate 200,000 jobs over forecast levels by the year 2010. Permit streamlining programs and transportation construction and other public works projects all stimulate economic opportunity, while the Framework Element's land use policies help ensure that there is an adequate supply of land and entitlement capacity available for new development.

Equity is broadly addressed throughout the Framework Element. The Economic Development Chapter calls for targeting infrastructure and public service investments in economically disinvested communities. The Land Use Chapter identifies districts, centers, and boulevards throughout the City. The Open Space and Conservation Chapter addresses the critical lack of recreational opportunities in the City's urban cores and its older residential neighborhoods through establishment of a citywide greenways network and development of smaller parks and plazas.

The Housing Chapter calls for implementation of the City's regional fair share housing needs. Permit streamlining and other development regulatory reforms can reduce the cost of housing, making it more affordable for lower income groups. The Land Use Chapter includes policies which encourage mixed commercial and residential development in districts and centers and along some of the City's many boulevards. An adequate supply of housing that meets market demands, augmented through mixed-use development, can help stabilize prices and maintain affordability.

The Transportation Chapter calls for development of a multimodal approach to mobility, providing a variety of choices--including shuttles and light rail systems as well as the more traditional fixed route busses--that will ensure access to jobs for those who do not own a car. The Infrastructure and Public Services Chapter calls for provision of fire protection, police, library, recreational, and other services at adequate levels in every neighborhood of the City.

Environmental quality is addressed by the Land Use and Transportation Chapters, which include development and mobility strategies for reducing air emissions. By encouraging growth that occurs to locate in centers and along boulevards served by transit, traffic congestion is reduced and air quality is improved. The Open Space and Conservation Chapter sets forth policies for the protection of the City's natural environmental resources.

The Infrastructure and Public Services Chapter continues current City policies concerning waste product recycling and water and electric power conservation. The compact development encouraged by the Land Use Chapter is more energy efficient than current patterns of development. The Urban Form and Neighborhood Design Chapter's residential development standards and citywide greenways network both enhance the quality of

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life by making neighborhoods more liveable.

Strategic public investment is advocated in both the Transportation and Infrastructure and Public Services Chapters as methods to stimulate economic development as well as maintain environmental quality. Coordinated street lights, functioning utilities, and adequate sewage capacity, while seemingly mundane, provide the essential foundations that make cities work. To the extent that Los Angeles is perceived as having a good quality of life and sound public services, the City's economic base is strengthened.

Clear and consistent rules are advanced through the Land Use Chapter's standard land use categories and definitions, thus bringing a measure of clarity and certainty to community plans. The Implementation Chapter calls for the completion of regulatory reforms that will "cut the red tape," making it easier for the City to attract jobs and private investment.

Implementation is made more effective through citywide monitoring of growth trends and infrastructure capacity. Public participation will ensure the responsiveness and relevance of the community plans that, over time, will be updated as a strategy for implementing the Framework Element. An annual report to the City will provide an opportunity to make policy adjustments as necessary in light of changing circumstances.

COMMUNITY INVOLVEMENT

Community involvement in the preparation of the Framework Element consisted of 60 neighborhood and two citywide public workshops. Over 3,000 persons participated in these events.

These workshops were advertised via special mailings, public service announcements, videos, and press releases to general and special interest newspapers, including publications oriented towards particular ethnic communities. In addition, a dedicated toll-free telephone line enabled the general public to call for "more information" about the project as publications became available or workshop dates were announced.

The community participation effort also included interviews and "focus group" discussions with community leaders, homeowners, property owners, and others.

STEERING COMMITTEE

A Steering Committee consisting of representatives from the Planning, Transportation, and Public Works Departments provided management direction to the project.

TECHNICAL ADVISORY COMMITTEE

A Technical Advisory Committee (TAC) provided review, technical assistance, and input on policy development. Membership on the TAC included representatives from the following City departments and outside agencies:

- Airports
- Building and Safety
- California Regional Water Control Board
- Chief Legislative Analyst

City Administrative Officer
City Attorney
Community Development
Community Redevelopment Agency
Councilman Hal Bernson's Office
Cultural Affairs
Environmental Affairs
Fire
Harbor
Housing
Housing Authority
Los Angeles Unified School District
Mayor's Office
Metropolitan Transportation Authority
Police
Public Works
Recreation and Parks
Southern California Association of Governments (SCAG)
South Coast Air Quality Management
District (SCAQMD)
Transportation
Water and Power

STATUTORY REQUIREMENTS

California State Government Code Section 65300 requires each county and city, including charter cities, to adopt a comprehensive general plan. The general plan may be adopted either as a single document or as a group of related documents organized either by subject matter or by geographic section within the planning area [Government Code Section 65301 (b)]. The general plan must be periodically updated to assure its relevance and usefulness.

Changes to the law over the past twenty years have vastly boosted the importance of the general plan to land use decision-making. A general plan may not be a "wish list" or a vague view of the future but rather must provide a concrete direction. In essence, the general plan is a "constitution for development," the foundation upon which all land use decisions in a city or county are to be based. It expresses community development goals and embodies public policy relative to the distribution of future land use, both public and private.

The general plan must include the following seven mandated elements (Government Code Section 65320):

1. Land Use
2. Circulation
3. Housing
4. Conservation
5. Noise
6. Open Space
7. Safety

In addition, State law permits the inclusion of optional elements which address needs, objectives, or requirements particular to that city or county (Government Code Section 65303).

Counties and cities have flexibility in organizing their general plans. This is permissible as long as all of the requirements specified for each of the seven mandated elements are addressed. For example, it is permissible to combine the Open Space and Conservation Elements into a single element (Government Code Section 65301 (a)).

The State law recognizes that the diversity of the State's communities and their residents and, thus, requires them to implement the general plan law in ways to accommodate local conditions while meeting its minimum requirements (Gov't Code § 65300.7). Further, State law recognizes that cities' and counties' capacity to respond to State planning law will vary due to the differences between them in size, characteristics, population, density, fiscal and administrative capabilities, land use and development issues and human needs (Gov't Code § 65300.9).

As a result, State law has given a city with the diversity and size of Los Angeles latitude in formatting, adopting and implementing its general plan, as long as it adheres to the minimum requirements of State law.

ORGANIZATION OF THE LOS ANGELES CITY GENERAL PLAN

The City of Los Angeles has reorganized the elements which comprise its general plan. Some mandatory elements have been combined. Others have been organized into separate elements. Optional elements have been added.

These changes are necessary to better address the particular issues facing the City of Los Angeles. The twelve elements which will comprise the Los Angeles City General Plan are listed below:

A. CITYWIDE GENERAL PLAN FRAMEWORK ELEMENT

B. LAND USE ELEMENT

The Land Use Element is divided into the following community plans:

Metropolitan Geographic Area	South Geographic Area
1. Boyle Heights 2. Central City 3. Central City North 4. Hollywood 5. Northeast Los Angeles 6. Silver Lake - Echo Park 7. Westlake 8. Wilshire	9. South Central Los Angeles 10. Southeast Los Angeles 11. West Adams - Baldwin Hills - Leimert Park

San Fernando Valley Geographic Area	West/Coastal Geographic Area
12. Arleta - Pacoima	26. Bel Air
13. Canoga Park - Winnetka - Woodland Hills	27. Brentwood - Pacific Palisades
14. Chatsworth - Porter Ranch	28. Harbor Gateway
15. Encino - Tarzana	29. Palms
16. Granada Hills - Knollwood	30. San Pedro
17. Mission Hills - Panorama City - North Hills	31. Venice
18. North Hollywood	32. West Los Angeles
19. Northridge	33. Westchester
20. Reseda - West Van Nuys	34. Westwood
21. Sherman Oaks - Studio City - Toluca Lake	35. Wilmington
22. Sun Valley	
23. Sunland / Tujunga - Shadow Hills - Lakeview Terrace	
24. Sylmar	
25. Van Nuys - North Sherman Oaks	

[Click Here to View Figure 4-1 City Subregions](#)

C. AIR QUALITY ELEMENT

D. TRANSPORTATION ELEMENT

E. HOUSING ELEMENT

F. INFRASTRUCTURE SYSTEMS ELEMENT

G. OPEN SPACE AND CONSERVATION ELEMENT

H. NOISE ELEMENT

I. PUBLIC FACILITIES AND SERVICES ELEMENT

J. HISTORIC PRESERVATION AND CULTURAL RESOURCES ELEMENT

K. SAFETY ELEMENT

L. URBAN FORM AND NEIGHBORHOOD DESIGN ELEMENT

The following chart identifies the relationship between the existing general plan structure and the new general plan structure. The chart explains which existing elements have been superseded by or incorporated into new elements. Completion of all cityplanning.lacity.org/cwd/.../01.htm

general plan elements, including necessary comprehensive updates, is dependent upon adequate funding.

Comparison of the Existing General Plan Structure with the New General Plan System

†Mandatory Elements under State Law

*Revision required when 1994 South Coast Air Quality Management Plan adopted

<i>Existing General Plan Structure</i>	<i>New General Plan System</i>
CONCEPT LOS ANGELES (long-range citywide policy)	To be superseded by the FRAMEWORK ELEMENT
CITYWIDE ELEMENT	To be superseded by the FRAMEWORK ELEMENT
LAND USE ELEMENT (Made up of 35 community plans)	No change
CIRCULATION ELEMENT	To be superseded by the TRANSPORTATION ELEMENT
Bicycle Plan	To be incorporated into the TRANSPORTATION ELEMENT
Central City Elevated Pedway	To be deleted as obsolete
Highways and Freeways	To be incorporated into the TRANSPORTATION (included in community plans) ELEMENT
SERVICE SYSTEMS ELEMENT	
City-Owned Power Transmission Right-of-Way	To be incorporated into the INFRASTRUCTURE SYSTEMS ELEMENT
Drainage	To be incorporated into the SAFETY ELEMENT
Major Equestrian and Hiking Trails	To be incorporated into the PUBLIC FACILITIES AND SERVICES ELEMENT
Power System	To be incorporated into the INFRASTRUCTURE SYSTEMS ELEMENT
Public Libraries	To be incorporated into the PUBLIC FACILITIES AND SERVICES

	ELEMENT
Public Recreation	To be incorporated into the PUBLIC FACILITIES AND SERVICES ELEMENT
Public Schools	To be incorporated into the PUBLIC FACILITIES AND SERVICES ELEMENT
Sewerage	To be incorporated into the INFRASTRUCTURE SYSTEMS ELEMENT
Water System	To be incorporated into the INFRASTRUCTURE SYSTEMS ELEMENT
ENVIRONMENTAL ELEMENT	
* Air Quality	Adopted as new AIR QUALITY ELEMENT in 1992
City-Collected Refuse Disposal	To be incorporated into the INFRASTRUCTURE SYSTEMS ELEMENT
† Conservation	To be superseded by the OPEN SPACE AND CONSERVATION ELEMENT
† Noise	To be updated as the NOISE ELEMENT
† Open Space	To be updated as the OPEN SPACE AND CONSERVATION ELEMENT
Scenic Highways	To be incorporated into the TRANSPORTATION ELEMENT
CULTURAL ELEMENT	
Cultural and Historic Monuments	To be superseded by the HISTORIC PRESERVATION AND CULTURAL RESOURCES ELEMENT
† HOUSING ELEMENT	Adopted as new HOUSING ELEMENT in 1993 Revision required by July, 1996
† SAFETY ELEMENT	
Fire Protection	To be included in the SAFETY ELEMENT
Safety	To be updated as the SAFETY ELEMENT

Seismic Safety	To be included in the SAFETY ELEMENT
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PURPOSE OF THE CITYWIDE GENERAL PLAN FRAMEWORK ELEMENT

The Framework Element establishes the broad overall policy and direction for the entire general plan. It is a discretionary element of the general plan which looks to the future and replaces Concept Los Angeles and the Citywide Plan (adopted in 1974). It provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the general plan's other elements -- including the community plans which collectively comprise the Land Use Element. The Framework Element also provides guidance for the preparation of related general plan implementation measures including Specific Plans, ordinances, or programs, including the Capital Improvements Program.

The Framework Element is not sufficiently detailed to impact requests for entitlements on individual parcels. Community plans will be more specific and will be the major documents to be looked to for consistency with the general plan for land use entitlements.

The Framework Element sets forth a conceptual relationship between land use and transportation on a citywide basis and defines new land use categories which better describe the character and function of the City as it has evolved over time. In addition, it sets forth an estimate of population and employment growth for a 15 to 20 year time period that can be used to guide the planning of infrastructure and public services. This, however, does not represent a limit on growth or a mandated level of growth in the City or its community plan areas. Traditionally, such "end-state" limits have proven ineffective in guiding growth and public infrastructure and service investments and in responding to the changing needs of a city's residents and its economy. In its place, the Framework Element establishes a program to annually monitor growth, its impacts, and infrastructure and service needs that will be documented in a report to the City Council and pertinent service departments and agencies. This will provide decision makers and planners with the information that is essential in shaping growth in a manner that can mitigate its impacts, minimize development costs, conserve natural resources, and enhance the quality of life in the City.

REGIONAL CONTEXT AND CONFORMITY WITH OTHER REGIONAL PLANS

The Framework Element serves as subregional input to the Southern California Association of Governments Regional Comprehensive Plan and Guide and provides a context for cooperative planning efforts between the City of Los Angeles, adjacent cities, and the County of Los Angeles. The Framework Element, along with the Air Quality Element and the Transportation Element, ensures conformity between the Los Angeles City General Plan and the Regional Comprehensive Plan and Guide and the Regional Air Quality Management Plan. The Regional Comprehensive Plan and Guide includes Growth Management and Mobility components.

MONITORING AND REPORTING

The Department of City Planning will develop and implement a growth Monitoring System and annually prepare a Report on Growth and Infrastructure to the Mayor, City Council, and the City Planning Commission. The Annual Report on Growth and Infrastructure will include policy and program recommendations and summary information generated by the Monitoring System on the City's changing circumstances, needs, and trends.

ORGANIZATION OF THE FRAMEWORK ELEMENT

The Framework Element consists of ten chapters that provide guidance to the comprehensive update of general plan elements and related implementation measures, as follows:

Chapter 1: General Plan System

This chapter defines the elements of the City of Los Angeles General Plan, how the City of Los Angeles addresses the issues required by the seven elements mandated by the State of California, and the role of the General Plan Framework Element in the comprehensive update of the other elements that comprise the City of Los Angeles General Plan.

Chapter 2: Growth and Capacity

This chapter establishes a consistent set of baseline and forecasted growth levels for population, employment, and housing citywide and for each community planning area and City subregion. It defines the planning assumptions that shall be used to ensure consistency in the comprehensive update of the other elements that comprise the City of Los Angeles General Plan.

Chapter 3: Land Use

This chapter provides guidance for the comprehensive update of the community plans that collectively comprise the Land Use Element and related implementation measures.

Chapter 4: Housing

This chapter provides guidance for the comprehensive update of the Housing Element and related implementation measures.

Chapter 5: Urban Form and Neighborhood Design

This chapter provides guidance for the amendment of the Land Use Element and the preparation of an Urban Form and Neighborhood Design Element and related implementation measures.

Chapter 6: Open Space and Conservation

This chapter provides guidance for the comprehensive updates of the Land Use and the Open Space and Conservation Elements and related implementation measures.

Chapter 7: Economic Development

This chapter provides guidance for the preparation of an Economic Development strategy, and related implementation measures.

Chapter 8: Transportation

This chapter provides guidance for the comprehensive update of a Transportation Element and related implementation measures.

Chapter 9: Infrastructure and Public Facilities

This chapter provides guidance for the preparation of the Infrastructure Systems and the Public Facilities and Services Elements, and related implementation measures, including financing strategies.

Chapter 10: Implementation Programs

This chapter is a synopsis of measures that implement the General Plan Framework Element policies and standards, and makes clear how the plan policies are to be applied.

INTERNAL GENERAL PLAN CONSISTENCY

According to California State Government Code Section 65300.5, a general plan must be integrated and internally consistent, both among the elements and within each element. This requirement applies to any optional Elements adopted by the City as well as the mandatory elements.

The internal consistency requirement also applies to the community plans which collectively comprise the City's Land Use Element. All principles, goals, objectives, policies, and plan proposals set forth in the general plan must be internally consistent.

All adopted elements have equal status and no element may be made subordinate to another.

1. The General Plan Framework Element and Its Relationship to the General Plan

The Framework Element is a special purpose element of the City of Los Angeles General Plan that establishes the vision for the future of the City of Los Angeles and the direction by which the citywide elements and the community plans shall be comprehensively updated in harmony with that vision. The Framework Element establishes development policy at a citywide level and within a citywide context, so that both the benefits and challenges of growth are shared.

Given the size and complexity of the City, the process of updating the community plans and the citywide elements takes time. The Framework Element's Long-Range Land Use Diagram and associated land use policies take effect incrementally, as each comprehensive community plan update is adopted.

The Framework Element replaces *Concept Los Angeles* and the *Citywide Plan*. This element enables a citywide perspective, to determine the most effective distribution of growth in relationship to environmental and economic goals, to enhance the environment and protect the quality of life, and to determine citywide policies and standards that can be implemented at the local level through a community planning process.

The citywide elements address functional topics that cut across community boundaries, such as transportation or public services. The citywide elements address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan.

The community plans are oriented towards specific geographic areas of the City, defining locally the more general citywide policies and programs set forth in the Framework Element and the citywide elements with more specificity than is appropriate at the citywide level. This differentiation is necessary because of Los Angeles' varied topography, development patterns, diverse cultural and ethnic communities, and other variations which require that policies, standards, and programs developed at the citywide level be tailored to meet community and neighborhood needs.

2. The General Plan Framework Element and Its Relationship to Other Elements

The Citywide General Plan Framework Element establishes the standards, goals, policies, objectives, programs, terms, definitions, and direction to guide the update of citywide elements and the community plans.

While the Long-Range Land Use Diagram in the Framework Element generally describes the centers, districts, and mixed-use boulevards to give a citywide perspective, the community plans will contain specific land use designations, intensities, and standards.

3. The General Plan Framework Element and its Relationship to Community Plans

Community plans apply the growth and development policies defined in the Framework Element and the other citywide elements as they relate to a smaller geographic area. Community plans are more detailed and specific than citywide elements and are necessary due to the size, complexity, and diversity of the City of Los Angeles. The community plans are tailored to local conditions and needs. Adoption of the Framework Element neither overrides nor mandates changes to the community plans. The community plans reflect appropriate levels of development at the time of the General Plan Framework Element's adoption. As community plans are updated utilizing future population forecasts and employment goals, the Framework Element is to be used as a guide -- its generalized recommendations to be more precisely determined for the individual needs and opportunities of each community plan area. Nothing in the Framework Element suggests that during the Community Plan Update process, the areas depicted as districts, centers, or mixed-use boulevards in the community plan must be amended to the higher intensities or heights within the ranges described in the Framework Element. The final determination about what is appropriate locally will be made through the community plans -- and that determination may fall anywhere within the ranges described.

As the City evolves over time, it is expected that areas not now recommended as neighborhood districts, community and regional centers, and mixed-use boulevards may be in the future appropriately so designated; and areas now so designated may not be appropriate. Therefore, the Framework Element long-range diagram may be amended to reflect the final determination made through the Community Plan Update process should those determinations be different from the adopted Framework Element.

4. The General Plan Framework Element and Its Relationship to Specific Plans

The City has a number of adopted specific plans which set detailed development regulations for local areas and include various types of regulatory limitations. Examples of these limitations include "trip caps," design review boards, density/intensity limits, maximum heights, landscape, lot coverage, etc. The General Plan Framework Element is consistent with and does not supersede nor override these local requirements.

5. Zoning Approvals and Zoning Consistency

The community plans and their implementing zoning set forth how property may be used and form the basis for decisions on discretionary permits. The community plans are the primary point of reference for determining compliance with Government Code Section 65860 (d).

the general plan as reflected in the community plans. The City Charter and the Los Angeles Municipal Code provide for variances, specific plan exceptions, exceptions and other tools to provide a means for relieving hardships from strict adherence to the zoning regulations or dealing with special situations.

6. Highways and Freeways

The Transportation Element contain general policies and definitions concerning highways and freeways. Community plans shall identify highway and freeway designations consistent with the policies and standards provided by the Transportation Element.

7. Comprehensive Community Plan Updates

The Framework Element provides the citywide perspective often lacking from locally produced land use planning efforts to establish overall guidelines for the community planning process. Individual community plans establish the specific guidelines within each community to implement the citywide Framework Element. The community plans comprise the Land Use Element of the City's general plan and are, therefore, the final determination of land use categories, zoning, development requirements, and consistency findings. Like all general plan elements, community plans are comprehensively updated on a periodic basis through a city-initiated process. However, given the size and complexity of the City, the process of updating all of them takes time.

The Framework Element itself may be amended to reflect changes and address issues which arise through the public participation and detailed parcel-by-parcel analysis that occurs when the community plans are updated. Care must be taken in revising the Framework Element to assure that citywide issues are not compromised in the process.

8. Annual Review

The Department of City Planning shall annually review the need to comprehensively update the citywide elements, including the Framework Element and the community plans. The results of this annual review shall be reported to the City Planning Commission, the City Council, and the Mayor through the Annual Report on Growth and Infrastructure. This report shall recommend which citywide element or community plan should be updated and why. These recommendations shall be based on an evaluation of changing circumstances, trends, and other information provided by the Monitoring System.

9. General Plan Preparation, Revision, and Update Program

The Department of City Planning has established a program to comprehensively update general plan elements and community plans to implement the goals, policies, and objectives established in the Citywide General Plan Framework Element. Subject to availability of funding, all comprehensive updates of the citywide elements and the community plans for the purpose of implementing the Framework Element shall be initiated within five years of adoption of the Framework Element. Phasing of such updates may be made in accordance with Objective 3.3. and Policies 3.3.1 and 3.3.2 based on the monitoring of population, development, and infrastructure and service capacities as recommended through the Annual Report on Growth and Infrastructure.

10. Periodic Plan Review

Periodic Plan Review is an on-going procedure of the Department of City Planning which permits

private applicants to request plan amendments and associated zone changes. Requests are subject to an established public review and approval process.

11. Pending Development Projects

Development projects pending in the City review process which had already completed circulation of a Notice of Preparation (under CEQA) at the time of adoption of the Framework Element, shall not be required to demonstrate consistency with the Framework Element for a period of two years (24 months) after that Element's adoption.

12. Redevelopment Plans

The community plans are the point of reference for determining compliance of Redevelopment Plans with State of California State Government Code Section 65860 (d).

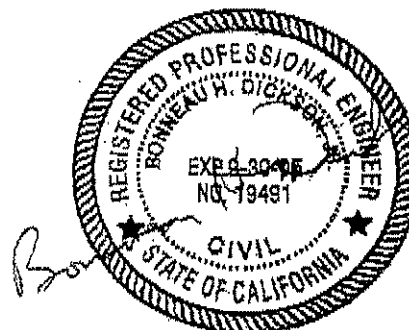
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Bonneau Dickson, P.E.
Consulting Sanitary Engineer

June 26, 2010

Mr. Robert Silverstein, Esq.
The Silverstein Law Firm
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504



BY FAX TO 626 449 4205

Re: Review Of The Sewer Impacts In The Emerson College Los Angeles Center
Project Environmental Impact Report

Dear Mr. Silverstein:

At your request, I have reviewed the sewer impacts that were addressed in the environmental impact report for the proposed Emerson College Los Angeles Center Project.

By way of background, I am a registered professional civil engineer in the State of California, No. C19491. My area of specialization is sanitary engineering. I have more than 30 years experience in all aspects of wastewater projects. A Career Summary and a resume of some of my sewer experience are attached.

As a part of my work, I reviewed the following documents:

The Draft Environmental Impact Report. (Case No. ENV-2009-0469-EIR, SCH 2009041149. Notice of Completion dated October 8, 2009).

The Final Environmental Impact Report. (Notice of Completion dated February 5, 2010).

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The proposed project is a Los Angeles campus for Emerson College of Boston, Massachusetts. The complex would have a total of approximately 115,000 square feet and would be 10 stories tall. It would contain academic and administrative space, student and faculty residential housing, and ground floor retail. There would be four levels of parking with three of them being below ground level.

In my professional judgment, the environmental review of the sewer portion of the proposed project is insufficient and incomplete. It suffers from a lack of study and is based on unsupported assumptions.

In particular, the environmental review of the sewer aspects of the proposed project is incomplete and inadequate with regard to the following items:

1. The location of the sewage discharge from the building is not disclosed.
2. No map of the sewer system was provided.
3. The capacities of several of the sewers that are listed as being relevant have not been gauged.
4. What description of the sewer system that is provided implies existing capacity problems that are not analyzed.
5. The sewer system might not be able to accommodate the total flow for the project.
6. A significant sewer construction project might be necessary to accommodate the flows from this or related projects.
7. There is no discussion of the sanitary sewer overflows (SSOs) that have occurred in the vicinity.

These items are discussed below.

1. The Location Of The Sewage Discharge From The Building Is Not Disclosed

The information presented does not show where the building drain(s) will be connected to the City sewer system. The building drain(s) could be connected to the sewer in Sunset Boulevard, to the sewer in Gordon Street, or to both.

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Since the point of connection is unknown, the effect on the sewer system cannot be determined. There is simply insufficient evidence to conclude there will be a less than significant impact on the sewer system.

2. No Map Of The Sewer System Was Provided

No map of the existing sewer system was provided, which makes analysis of the sewer impacts extremely difficult, if not impossible. Again, as a result, there is simply insufficient evidence to conclude there will be a less than significant impact on the sewer system.

3. The Capacities Of Several Of The Sewers That Are Listed As Being Relevant Have Not Been Gauged

According to the table on Comment 3.3 of the FEIR, which is the same as Table IV.1-3 of the Draft EIR, three of the nine involved sewers have not been gauged; the same wording appears near the end of the third paragraph on Page IV.1-18 of the Draft EIR. Yet, Comment 3.3 explicitly states that "*gauging is needed for these lines.*" (Emphasis added.) The same wording appears on Page IV.1-18 of the Draft EIR. Until such gauging and evaluation is done there is insufficient evidence on which to determine whether the sewers have adequate capacity.

4. The Description Of The Sewer System That Is Provided Implies Existing Capacity Problems That Have Not Been Analyzed

The deficiencies identified in Items 1 through 3 above result in insufficient evidence on which to determine whether there is adequate capacity in the sewer system. The description, that is provided, though, provides evidence that there may actually be existing capacity inadequacy in the system.

The sewer system in the vicinity of the project is described in the November 4, 2009 Comment Letter No. 3 from Brent Lorscheider of the Wastewater Engineering Services Division of the Bureau of Sanitation as follows:

"The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Sunset Blvd and existing 6-inch line on Gordon St. The sewage from the existing 8-inch line splits into a 12-inch line on Gower St. and 24-inch line on El Centro Ave. The flow from the 12-inch line feeds into an 18-inch line on Vine St. before splitting into the 20-inch line and 24-inch line on Melrose Ave.

"The sewage from the existing 6-inch line splits into a 10-inch line on Santa Monica Blvd. and 12-inch line on Lexington Ave. before discharging into an 18-inch line on Vine St. The current flow level (d/D) of 50% in the 6-inch and 10-inch lines and 12-inch on Lexington Ave. cannot be determined at this time as gauging is needed for these lines."

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Virtually identical wording can be found on Page IV.I-18 of the Draft EIR.

The second sentence in the description says that the sewage from the existing 8-inch line "splits" into a 12-inch line on Gower Street and a 24-inch line on El Centro Avenue. Flows in gravity sewer system very rarely "split". Where there is a "split", there usually is a capacity problem in one or more of the involved sewers.

Splitting sewage flow among multiple sewers requires very careful attention to design to achieve the desired split. No information is given on how much of the sewage flow is directed to each of the pipes among which it is "split" making it impossible to determine whether the capacities of these pipes is adequate.

The description of the sewer system goes on to say that the flow from the 12-inch line, which is in Gower Street, feeds into an 18-inch line on Vine Street. This means that it would have to cross the previously mentioned 24-inch line in El Centro Avenue. Having sewer lines cross in this manner is extremely unusual. In more than 30 years of professional sanitary engineering, I do not remember having ever seen such an arrangement. Usually the sewers would join together.

The description then refers to another "split" into 20-inch and 24-inch lines in Melrose Avenue. Again, no information is given on how much of the sewage flow is directed to each of the pipes among which it is "split," making it impossible to determine whether the capacities of these pipes is adequate.

According to the FEIR, the 6-inch line in Gordon Street "splits" into a 10-inch line on Santa Monica Boulevard and a 12-inch line on Lexington Avenue. Again, splitting of flows over sewers in two successive blocks is a very rare arrangement and implies that the "split" was necessary due to a lack of capacity in some of the sewers.

It should be noted that the description of the sewer system presented on Page III-8 of the Draft EIR differs from the descriptions in Comment Letter No. 3 and on Page IV-I-18 of the Draft EIR. It is particularly troublesome that the Gordon Street sewer system is said to have a size of 9-inches or less. Sewers usually do not come in a 9-inch size. This statement may imply that the Gordon Street sewer system is at most 8-inches in size. This conflicts with the sizes given for the sewers in Santa Monica Boulevard and Lexington Avenue in Table IV-I-3 of the Draft EIR.

From the missing information, and conflicting descriptions of the sewer system, it is clear that the availability of sewer capacity has not in fact been adequately addressed.

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5. The Sewer System Might Not Be Able To Accommodate The Total Flow For The Project

The first line of the paragraph below the table in comment 3.3 states, "Based on the estimated flows, it appears the sewer system *"might be able"* to accommodate the total flow for your proposed project." (Emphasis added). The very wording of this statement means that it is unknown whether or not the sewer system can accommodate the flow from the project. Indeed, the discussion of sewer splits in the Draft EIR is a strong indication that it cannot.

6. A Significant Sewer Construction Project Might Be Necessary To Accommodate The Flows From This Or Related Projects

Because the sewage flows from the proposed Emerson project and other related projects may exceed the capacity of the sewage collection system, a major sewer construction project might be required. A sewer from the proposed site westward on Sunset Boulevard to Vine Street and southward on Vine Street to Melrose Avenue would be approximately 1.2 miles long, and an even longer sewer project might be necessary. Such a sewer project would result in significant noise, dust, traffic and congestion over a wide area.

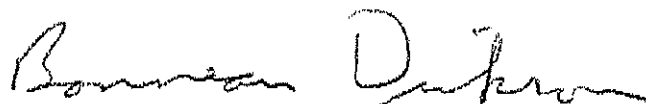
In addition to the physical impacts, a construction project of that scope would cause a huge economic hardship to businesses along the project route as a result of limited access.

7. There Is No Discussion Of The Sanitary Sewer Overflows (SSOs) That Have Occurred In The Vicinity

The City of Los Angeles is notorious for the number of sanitary sewer overflows (SSOs) that have occurred in the past. A check should have been made of where there have been sewage spills in the vicinity of the proposed project to evaluate whether the additional sewage from the proposed project would be likely to increase the number and severity of sewage spills. Between 1992 and 2002 alone, some 3,670 spills were documented.

In summary, in my opinion the impacts from the proposed project on the sewer system have not been adequately evaluated. These impacts must be addressed at this time and must not be deferred until a later time.

Very truly yours,



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Career Summary

Education: Georgia Institute of Technology
B.S. Civil Engineering -- 1960
M.S. Sanitary Engineering -- 1964

Harvard University
M.A. Sanitary Engineering -- 1965
Master of Business Administration -- 1975

Registration: Civil Engineer -- California # 19491

Professional Affiliations: Water Environment Federation
American Water Works Association

Over thirty years experience in all aspects of studying, designing and constructing water, wastewater, and stormwater facilities, both in the United States and abroad.

Design Experience. Have participated in the design of approximately 300 water, wastewater and stormwater projects, ranging in size from a single septic tank or well to a 120 MGD pure oxygen wastewater treatment plant. Was the project manager on many of these projects.

Construction Management Experience. Have been resident engineer or otherwise participated in the construction phase of approximately 20 water and wastewater projects.

Management Experience. Have both project management and general management experience. Have been project manager on approximately 175 projects. Was operations manager for a 150 person engineering firm, and have frequently managed design teams and design departments. Have served as staff to technical agencies assisting them select, hire and manage other consultants.

Forensic Engineering Experience. Have served as forensic technical consultant, expert witness, or claims analyst on more than 100 projects.

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SEWER AND PIPELINE ASSIGNMENTS

City of Vacaville. Elmira Road Trunk Sewer Replacement. Design of 3,500 feet of 54-inch sewer to replace an existing sewer which was damaged by hydrogen sulfide corrosion. To protect the new sewer, PVC lined concrete pipe was specified.

City of National City. Design of 1,300 feet of sewer, including two jack and bores. During the study phase, inversion lining and slip lining were considered for parts of the sewer project. The project also included replacement of pumping equipment and installation of a new radio alarm system in four pump stations.

City of El Segundo. Feasibility study and design of a storm water pump station modification project. The feasibility study analyzed the alternatives of two separate pump stations versus a single pump station connected by 1,300 feet of 60 inch sewer. The single pump station alternative was selected. Because the sewer will be at depths of up to 35 feet, much of it will be constructed by jacking and boring. The design included six submersible pumps with a design capacity of 105 CFS (68 MGD) and 1,400 total installed horsepower.

Rocklin-Loomis Municipal Utility District. Sewer master plan for a 66 square mile region. The district had been in one geographic basin for 25 years, but had recently been given responsibility for a much expanded area and two new trunk sewer systems. The work of projecting growth rates and land use patterns was complicated by the fact that most of the existing land use planning documents were seriously out of date. The findings of the report were presented and defended at a series of public meetings. Ongoing district consulting engineering services were also provided.

Placer County Bell Road Subdivision. Design and construction services on 24,000 feet of sanitary sewers and forcemains, and two new sewage pumping stations for the Bell Road Subdivision.

City of Oakdale. Assisted the City in documenting industrial discharges of high strength wastewater to the municipal sewer system, and in devising plant improvements to deal with these discharges. Other projects for the City of Oakdale included expansion of the wastewater treatment plant capacity, an Infiltration/Inflow study of the sewer system, and a financing plan and revenue program.

Mariposa County. Design of small diameter variable grade effluent sewers and mound disposal systems for three rural communities. The work included a review of available technical literature on these innovative technology systems and discussions with experts throughout the United States.

East Bay Dischargers Authority (EBDA). Analyzed whether an existing 60-inch forcemain could withstand an additional surcharge of 4-feet of soil and storage of modular buildings above it. The analysis indicated that the existing pipe was sufficiently strong to allow the proposed development above it. In a second project, analyzed the impact of a construction project in which three 42-inch storm drain culverts were constructed on top of the Authority's 60-inch effluent force main. Determined that the force main had adequate structural strength for the additional load but recommended some modifications and corrections to the contract drawings to clarify the details of the pipe crossing and minimize the probability of problems during construction.

City of Point Arena. Was asked by the City to recommend Infiltration/Inflow improvements to the sewer system since the City's percolation ponds had nearly overflowed during the preceding winter. Determined that improvements of the percolation ponds would increase the capacity of the system at only a fraction of the cost of improving the sewer system.

City of San Leandro. Estimated the costs of a five-year capital improvement program for the City's 16 sewage and stormwater pump stations for use as input in the budgeting process.

Dunnigan, CA. Reviewed the wastewater collection, treatment and disposal systems proposed in an Environmental Impact Report for the Town of Dunnigan in the Central Valley. Treatment and disposal will be through a pond system.

Monrovia Canyon Park Wastewater Disposal. Analyzed three alternatives for disposing of wastewater from a remote canyon park: (a) over a mile of conventional sanitary sewer to connect to the City sewer system; (b) septic tanks with a small diameter variable grade effluent sewer (VGES) to the City sewer system; and (c) septic tanks with soil absorption systems. The innovative VGES system costs only 40 percent of the conventional sewer alternative, but provides the same degree of service and reliability. It has been selected for implementation, saving the City an estimated \$155,000.

City of San Leandro. Field advice on alternative pumping arrangements during repair of a forcemain leak. Responded within an hour to advise on alternative measures for disposing of raw wastewater if the leaking forcemain collapsed during repair. Suggested letting the collection system flood sufficiently to allow a manhole on the periphery of the system to be used as a wetwell from which mobile pumps could pump to another collection system without crossing or interfering with major streets.

Placer County. Conducted an investigation of the technical feasibility of transporting alum sludge from a water treatment plant through a long gravity sewer, pump station, forcemain and siphon to a wastewater treatment plant. Focus was on practical problems likely to be caused by the alum sludge, especially in the sewer system and in the anaerobic digesters and sludge dewatering press. Prepared a revenue plan type of cost analysis to determine a fair monthly user charge and a connection fee for the water treatment plant.

City of San Leandro. Evaluation of clogging air valve problem on effluent force main. Reviewed the reported problem, and several corrective measures including: a mechanical screen on the plant effluent; control of bypassed flows; and replacement of the air valves. Concluded that the most effective course of action was to continue with the same maintenance program, i.e., that it was more cost effective to clear the valves periodically than to try to cure the problem with additional facilities.

City of Mill Valley. Evaluated the alternatives of improving the Enchanted Knolls Pump Station versus replacing the station with a gravity line connected to a force main leading to the wastewater treatment plant. The feasibility of using a gravity line depended upon the actual height of the hydraulic gradeline in the force main during periods of peak flow. A program to investigate the actual height of the hydraulic gradeline was developed as a part of the work. The gravity sewer line proved to be technically feasible, if provided with several safeguards, and was designed and constructed, allowing the City to abandon the pump station.

City of Morgan Hill. Analyzed the existing rate structure to determine whether it fairly allocated the costs of service among three classes of residential users and among commercial users. Analyzed a proposed surcharge on customers who were served by pumping rather than by gravity. In an update of the earlier study included consideration of the fairness of the three residential tiers, the division of costs between residential and commercial users, and the use of a special surcharge for those users served by pumping stations rather than by gravity.

CSD 2-3 of Santa Clara County. Provided technical assistance to legal counsel for this sewer district. Analyzed a large increase in rates for the use of joint facilities that was proposed by the City of San Jose. Provided technical input in the preparation of legal documents seeking injunctive relief.

Santa Cruz County Sanitation District. Analyzed water hammer problems in a 4.17 mile long, 36-inch diameter steel force main. Reviewed the effectiveness of an existing surge relief valve and made recommendations on how to prevent the check valves from slamming.

Santa Cruz County Sanitation District. During May and June, 2000, served as the lead project engineer on the design of rehabilitation of 25,000 linear feet of sewer pipe for the Santa Cruz County Sanitation District to correct excessive leakage (infiltration and inflow). The project will rehabilitate the building laterals from the sewers up to the edge of the public right-of-way. More than 500 laterals with a total length of approximately 10,000 feet are included in the project. The rehabilitation options include replace and repair, pipe-bursting, and lining by various technologies. The estimated construction cost of the project is \$3.3 million. The project was done on an expedited basis to prevent a recurrence of overflows from a pump station. The complete design took just seven weeks.

City of San Leandro. Evaluation of clogging air valve problem on effluent force main. Reviewed the reported problem, and several proposed corrective measures including: a mechanical screen on the plant effluent; control of bypassed flows; and replacement of the air valves. Concluded that the most effective course of action was to continue with the same maintenance program, i.e., that it was more cost effective to clear the valves periodically than to try to cure the problem with additional facilities.

City of San Leandro. Investigated the technical feasibility of providing a gravity bypass between the influent manhole and the effluent manhole of the Wicks Extension Pump Station. The gravity bypass was found to be technically feasible, i.e., if the pump station fails, the upstream sewer system will fill up but before it spills, flow will bypass by gravity to the downstream sewer system. The use of this simple 10-foot long gravity bypass avoided installing a stationary standby generator at this pump station.

East Bay Dischargers Authority (EBDA). Analyzed the impact of a construction project in which three 42-inch storm drain culverts were constructed on top of the Authority's 60-inch effluent force main. Determined that the force main had adequate structural strength for the additional load but recommended some modifications and corrections to the contract drawings to clarify the details of the pipe crossing and minimize the probability of problems during construction.

City of San Leandro. Provided a technical evaluation of the feasibility of restoring a buried methane gas line to use. Due to settlement of the soft bay muds at the treatment plant site, there were numerous dips in the gas line, which formed water traps that interfered with the use of the line.

Oro Loma Sanitary District. Designed modifications to the digester gas piping system to separate it from electrical facilities and thus bring it into compliance with National Fire Protection Association Standard 820 and the National Fuel Gas Code.

Santa Cruz County Sanitation District, Aptos Transmission Main Relocation. Participated in an analysis of relocating a major transmission main from a beach to an inland location. The original main had been damaged by movement of the beach sand during major storms. The alternative location required pumps with greater heads but it was found that these pumps would fit in the existing pump station.

Portola Valley Sewer Alternatives Evaluation Study. Conducted a major study of how best to serve an unsewered area that was experiencing scattered failures of leach fields. The report considered: conventional gravity sewers; on-site grinder pumps and pressure sewers; septic tank effluent pump (STEP) systems; and septic tank effluent gravity (STEG) systems. A detailed estimate was made of the actual operation and maintenance cost of existing STEP systems and a survey was conducted of how other agencies handled such systems. Alternative financing arrangements for sewer improvements were evaluated.

Stonehurst Subdivision. Served as District Engineer for a subdivision which has its own collection system and wastewater treatment and disposal system.

Stonehurst Subdivision Wastewater Facilities Evaluation. Evaluated the condition of the entire wastewater collection, treatment and disposal facilities for a subdivision. The facilities consisted of septic tanks on each lot, small diameter pressure and gravity sewers, a recirculating gravel filter, and community leach fields. The Homeowners Association was reluctant to accept ownership of the wastewater facilities because of numerous failures that were being experienced, especially failures of the force main piping allegedly due to water hammer. Determined that the force main failures were just as frequent on low pressure piping as on high pressure piping and that water hammer apparently was not a factor. It was further found that all of the force main breaks had occurred at places where fittings or loose couplings had been used and that none of the joints with integrally molded bells had failed. Since there were relatively few fittings and loose couplings, it was concluded that most of the problems had already been fixed and that the whole piping systems did not need to be replaced.

Connection of a Lot to an Existing Small Sewer System. Evaluated the connection of an additional lot, on which the leach field had failed, to an existing small sewer system. Considered whether other lots should also be connected or allowed to connect, required facilities and optimum sewer routing, right-of-way issues, regulatory requirements, and procedures of the Local Agency Formation Committee (LAFCO). Calculated a fair buy-in price.

Point Arena Sewer Master Plan Evaluation. Was asked by the City to visit the site as the first step in preparing a sewer master plan. While on site with the City officials, determined that the real problems were: (1) where to locate a relief sewer; (2) how to serve a currently undeveloped area; and (3) how to address some marginal sewer facilities. Advised the City that a sewer master plan would be difficult and expensive to prepare, that such a plan probably would be inaccurate because most of the problem was inflow and infiltration for which few measurements existed, and that the problems could be addressed without a master plan. Prepared a brief letter report advising the City on how to deal with each problem.

Point Arena Residence Connection to a Sewage Force Main. Reviewed a proposal to allow a residence to connect to the force main from the cove to the wastewater treatment plant. Concluded that the proposed connection would not interfere with the operation of the force main. Made recommendations to protect the house from flooding and to minimize the probability of spills from the force main.

Sewer Design Standard of Care. Expert witness on a case involving delay claims caused by problems with the design of the sewer system for a large apartment complex. Prepared a certificate for use in filing suit against the design engineer.

Lawrence Livermore Laboratory Grease Interceptor Odor Evaluation. Evaluated odor problems at the grease interceptors at three cafeterias. Recommended a program for systematically developing odor complaint data and various odor control improvements.

Chemonics International, Inc. Spent three and one-half weeks in Tunis, Tunisia leading a team that evaluated the El Menzah pilot project, which is the first project in a program that involves the privatization of a portion of the wastewater collection and treatment facilities in the country. Interviewed Tunisian and U.S. Agency for International Development officials, and the French contractor who is operating the sewerage system.

Handicapped Housing Development, Monterey County. Provided a conceptual design for an on-site wastewater collection, treatment and disposal system for a 129-unit garden apartment complex for handicapped persons. The design called for a septic tank for each cluster of apartments with a variable grade effluent sewer (VGES) system to convey the septic tank effluent to a package treatment plant. The treatment plant was designed to achieve a high degree of nitrogen removal since nitrate concentrations in the groundwater were an issue in this location. A grinder pump station with a small diameter force main was used. Disposal was designed to include sub-surface drip irrigation and a conventional leach field. The estimated total cost of the system was approximately \$750,000.

High Pressure Reclaimed Water Line Failure. Provided expert advice in a case in which a gasket blew out in a 600 PSI reclaimed water line. Reviewed previous reports by the agency and by outside consultants. Issues in the case included the substitution of gaskets and possible stretching of stainless steel bolts in this extremely high pressure application.

Air Release Valve Failure. Expert analysis and advice. When a worker attempted to work on an air release valve, the valve blew loose from a high pressure reclaimed water line severely injuring the worker. Reviewed the reports from OSHA, the agency and other parties. Observed in photographs taken just before the accident occurred that the air release valve was leaning. Noted that the valve was located immediately adjacent to a road through the construction site and concluded that the valve had been struck by a vehicle.

Corrosion Failure of Concrete Trunk Sewers, Pima County, AZ. Provided expert advice in a case where sink holes developed suddenly at three locations along a large concrete trunk sewer. Rebutted a theory that the sinkholes were caused by a broken water main.

Point Arena, CA Sewer System Extension. Assisted this small City in evaluating alternatives for extending the existing sewer system to serve a California Department of Forestry compound. Alternatives that were considered included a conventional gravity sewer and a small diameter pressure sewer following a septic tank.

Homeowner v. City. Evaluated a situation in which a private sewer serving several residences in a court was found to be backing up. The City, which owned the public sewer to which the private sewer connected, inspected their portion of the piping and found that it was not blocked. The City then required the homeowner to replace the private sewer. After construction of the replacement sewer was complete, it was found that it again was not flowing freely. My investigation revealed that the City sewer was not low enough to serve the private sewer and that the system had been built with a sag in it.