



October 25, 2019

via email: clerk.plumcommittee@lacity.org
andrew.choi@lacity.org

**HONORABLE MEMBERS OF THE
PLANNING AND LAND USE COMMITTEE**

Honorable Councilmember Marqueece Harris-Dawson, Chairman
Honorable Councilmember Curren D. Price, Jr.
Honorable Councilmember Gilbert A. Cedillo
Honorable Councilmember John S. Lee
Honorable Councilmember Bob Blumenfeld

Subject: Flower Market/CPC 2016-3990/VTTM 74568

Our office represents the Southern California Flower Growers, Inc. This entity owns the property commonly known as the Southern California Flower Market ("Flower Market"), which is located at 755 S. Wall Street in downtown Los Angeles. The property is about 3.9 acres in size and has frontage along Wall Street, 7th Street and Maple Avenue.

On October 3, 2019, I submitted a letter asking the Planning and Land Use Management ("PLUM") Committee to support the City Planning Commission's recommendation to approve the Flower Market project. Upon closer review of the Commission's proposed conditions of approval, we would like the PLUM Committee to modify Condition No. 29.c (Electric Vehicle Parking). The Commission has typically mandated that developments have 20 percent of the total Code-required parking spaces be capable of supporting future electric vehicle supply equipment (EV ready) and that 5 percent of the total Code-required parking be provided with provided with EV chargers (EV installed). This particular condition, however, increases this percentage to 50 percent because the project seeks parking which exceeds Code. The reason for what appears to be "excess" parking is only to meet the project's parking demand identified by Fehr & Peers, the applicant's traffic and parking consultant. We don't believe the project should be burdened with the Commission's higher percentage when the intent is to meet the parking demand and not encumber the surrounding neighborhood with project parkers that might be unable to find on-site parking. For this reason, we respectfully request PLUM to modify the condition of approval to the Commission's standard EV language. The language would read as follows:



Electric Vehicle Parking. The project shall include at least 20 percent of total code required parking spaces as capable of supporting future Electric Vehicle Supply Equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Five (5) percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Joel B. Miller". The signature is written in a cursive style.

Joel B. Miller

Cc: Scott Yamabe, Southern California Flower Growers, Inc.