

Public Comments Not Uploaded C.F. Nos. 22-0922-S1 and 22-0922-S2

1 message

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Reply-To: clerk.plumcommittee@lacity.org
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Cc: Jamie Hall <jamie.hall@channellawgroup.com>

Mon, Oct 3, 2022 at 1:17 PM

Good afternoon,

On behalf of the Beverly Wilshire Homes Association, please see the attached documents which have been uploaded to both of the above-referenced Council Files. Thank you.

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3 attachments

BWHA San Vicente - PLUM Appeal Letter 10-3 final.pdf
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September 3, 2022

VIA ELECTRONIC MAIL

Hon. Marqueece Harris-Dawson, Chair
Planning and Land Use Management Committee
200 North Spring Street
Los Angeles, CA 90012
armando.bencomo@lacity.org

**Re: C.F. Nos. 22-0922-S1 and 22-0922-S2; 650-676 S. San Vicente Blvd.;
Case Nos. CPC-2017-467-GPA-VZC-HD-SPR-1A and VTT-74865-1A;
ENV-2017-468-EIR (SCH No. 2020010172)**

Dear Chair Harris-Dawson and Honorable Committee Members:

This firm represents the Beverly Wilshire Homes Association ("Appellant" or "Association") in its opposition to the above-referenced entitlements. Association is a non-profit, incorporated organization of property owners, residents and businesses within the area bounded by La Brea to La Cienega and Rosewood to the north side of Wilshire Blvd. From 1956 to the present the Association has been the voice of the community. Its mission is to improve the quality of life for its members and the community.

The Project is the demolition of a 5,738 square-foot vacant educational building and an 8,225 square-foot sporting goods store and associated surface parking to develop a medical office and retail-commercial high-rise development on a site measuring approximately 32,290 net square feet. The Project would include up to 145,305 square feet of Floor Area comprised of 140,305 square feet of medical office space and 5,000 square feet of ground-floor retail-commercial space, of which up to 4,000 square feet may be a restaurant and 1,000 square feet may be other commercial uses such as a pharmacy. The Project structure would be 12 stories and

would measure 230 feet in height to the top of the mechanical penthouse, comprised of seven stories of medical office uses over four stories of above-grade parking and a ground-floor lobby for the medical office and commercial uses. This letter supplements the Association's previous objections to the proposed medical office tower at 650-676 S. San Vicente Boulevard ("Project") and the General Plan Amendment, Vesting Zone and Height District Change, Site Plan Review, Vesting Tentative Tract Map and Environmental Impact Report ("EIR"). The Association requests that the Project be denied for the reasons identified in the appeal justifications and as argued herein.

I. THE PROJECT APPROVALS VIOLATE THE LAMC

A. The Project Improperly Utilizes Calculates Vehicle and Bicycle Parking

1. The Bicycle Parking Reduction Necessarily Applies Prior to the Legislative Reduction

The Project relies on two separate parking reductions to reduce the vehicle parking requirement. First, the Project applies a 20 percent legislative reduction pursuant to LAMC Section 12.32-P which states: "As part of any legislative land use ordinance, the Council may approve changes to the parking requirements not to exceed 20% of the requirements *otherwise required by the Code*." Second, the Project applies a 30 percent bicycle parking substitution pursuant to LAMC Section 12.21-A.4, which states:

*New or existing automobile parking spaces required by the Code for all uses may be replaced by bicycle parking at a ratio of one standard or compact automobile parking space for every four required or non-required bicycle parking spaces provided, so long as the number of compact stalls complies with Section [12.21 A.5.\(c\)](#) of this Code. [...] Automobile parking spaces for nonresidential projects or buildings located within 1,500 feet of a major transit stop, as defined in Subdivision (b) of Section 21155 of the California Public Resources Code as that section may be amended from time to time, may replace up to 30 percent of the **required automobile parking spaces** with bicycle parking.*

The Project improperly applies the *discretionary legislative reduction* pursuant to LAMC Section 12.32-P prior to the *ministerial reduction* pursuant to LAMC Section 12.21-A.4. The legislative reduction permits a 20 percent reduction from the "requirements otherwise required by the Code" which in this case would mean the base LAMC parking requirements after accounting for ministerial bicycle parking substitution. The bicycle parking substitution permits a 30 percent reduction from the "required automobile parking spaces[.]" However, Section 12.32-P does not establish the "required automobile parking spaces," but rather authorizes a permitted reduction which the City Council may approve. Thus, the plain text of the LAMC

mandates that the bicycle parking substitution calculation be applied *prior to* the legislative reduction.

2. *The Project Fails to Provide Bicycle and Vehicle Parking Required by the LAMC*

As demonstrated in the table below, the Project fails to provide both the required bicycle parking spaces and the required vehicle parking spaces. By improperly applying the bicycle parking reduction *after* the legislative reduction, the Project erroneously claims that only 716 bicycle parking spaces are required (4 spaces per each space substituted) when in fact 892 bicycle parking spaces are required. Furthermore, the Project improperly rounded down its calculations for required vehicle parking, erroneously claiming only 417 vehicle parking spaces are required when in fact 419 spaces are required. As a result, the Project fails to comply with the LAMC.

<u>Vehicle and Bicycle Parking Space Requirements</u>		
	Vehicle Parking Spaces	Bicycle Parking Spaces
Per LAMC	746	
w/ Bicycle Substitution	(30 percent reduction) 746 x 0.3 = 223.8 Round down to 223 spaces* 746 – 223 = 523	223 x 4 = 892
w/ Legislative Reduction	(20 percent reduction) 523 x 0.2 = 104.6 Round down to 104 spaces* 523 – 104 = 419 spaces	
LAMC Section 12.21-A.4(k) allows only fractions up to and including one-half to be rounded down, whereas fractions over one-half shall be construed as requiring one automobile parking space.		
Total	419 required Less than 418 provided	892 required Less than 716 provided

B. Parking Plans Violate the LAMC

1. *Parking Lifts Improperly Utilize Tandem Parking*

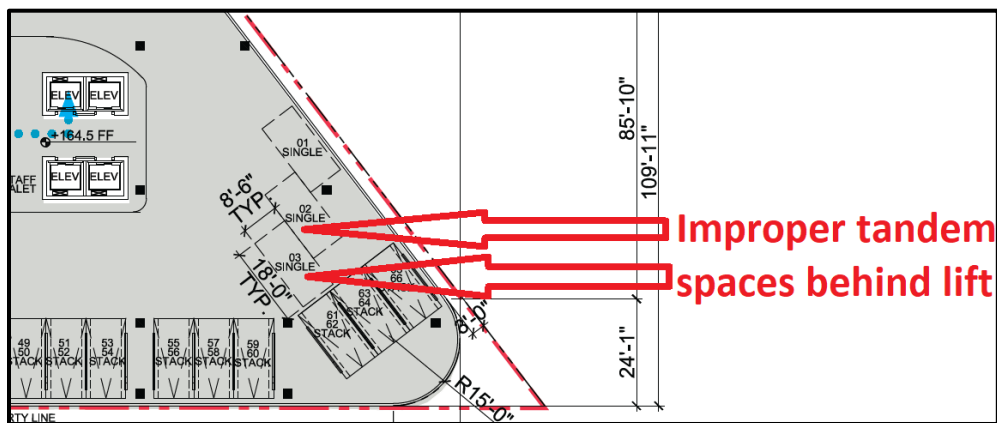
LAMC Section 12.21-A.4(h) requires that all required parking spaces shall be accessible. The Superintendent of Building has published the Parking Design Bulletin (**Exhibit 1**) to clarify the meaning of accessibility in the context of tandem and stacked parking.

2. *The platform of the mechanical lift on which the automobile is first places shall be individually and easily accessible and shall be placed so that the location of the platform*

and vehicular access to the platform meets the LAMC Section 12.21A5(a), (b), and (i) requirements.

9. In a private garage or private parking area, the tandem parking shall not be more than two cars in depth [LAMC Section 12.21 A.5 (h)(2)]. Therefore, no parking spaces are permitted at the front and/or back of mechanical automobile parking lifts.

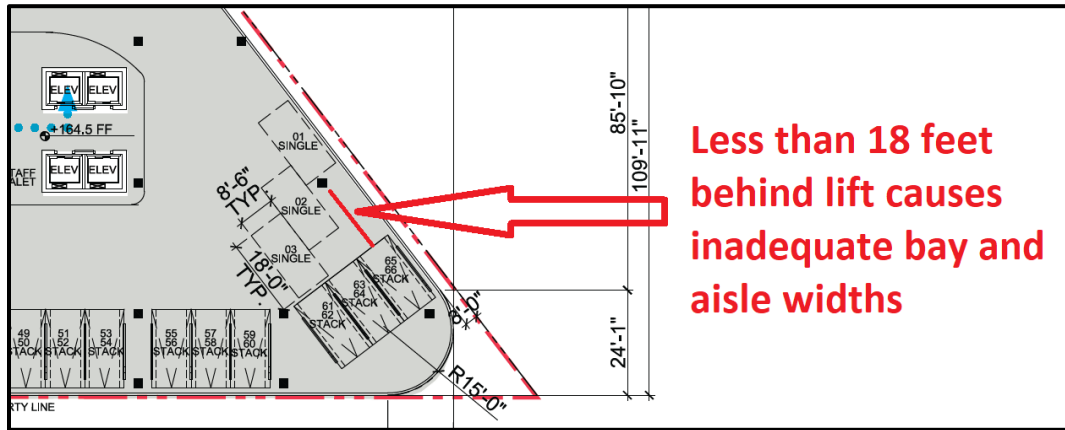
As shown in the diagram below, the Project violates both LADBS and LAFD standards because the platform of the mechanical lifts are not individually accessible, and because parking spaces are located behind mechanical lifts.



2. Parking Lifts Fail to Provide Required Aisle Width

LAMC Section 12.21-A.5 establishes parking design standards, including graphs plotting minimum bay and aisle widths for parking areas based on the angle of parking. The LADBS Parking Design Bulletin clarifies the dimensions on these graphs to specify the precise widths required for various parking configurations. As noted above, the Parking Design Bulletin requires that the platform on the mechanical lift shall meet the standards in LAMC Sections 12.21-A.5(a) (Bay Dimensions) and 12.21-A.5(b) (Aisle Dimensions). Table 4 establishes minimum bay widths between 42 feet and 46 feet for standard parking stalls installed at 90 degrees to the aisle. Table 6 requires minimum aisle widths of 20' for compact commercial parking stalls and 22' for standard commercial parking stalls installed at 90 degrees to the aisle.

The Project fails to comply with these standards because parking lifts on the southern corner of the parking levels have inadequate bay and aisle widths. Based on the dimensions shown on the plans, the aisle width is less than 18 feet because there is a structural column located immediately behind the lifts. This results in a bay width of less than 36 feet, adding the 18 foot depth of each stall to the distance between the lift and the structural column, which is less than 18 feet. Thus, the lifts on each level are noncompliant with the LAMC and the parking spaces cannot count as required parking spaces. This noncompliance is illustrated below:



3. *The Non-Compliant Spaces Result in Inadequate Vehicle Parking*

As shown in the table below, the non-compliant parking configuration results in 16 parking spaces shown on the Project plans unable to count as required parking. Even assuming the Project’s parking calculations are correct, with 417 spaces required and 418 spaces provided, this results in a deficiency of 15 parking spaces.

<u>Summary of Non-Compliant Parking Spaces</u>		
Level	Violation	Noncompliant Spaces
L2	Aisle/bay width	2 spaces in one lift
L2	Tandem	2 single spaces
L3	Aisle/bay width	2 spaces in one lift
L3	Tandem	2 single spaces
L4	Aisle/bay width	2 spaces in one lift
L4	Tandem	2 single spaces
L5	Aisle/bay width	2 spaces in one lift
L5	Tandem	2 single spaces
Total		16 spaces

4. *The Non-Required Aisle and Unstriped Spaces Violate the LAMC*

The Project applicant states that the Project provides 33 non-required aisle and unstriped spaces within the Project site, and asserts that these spaces may be used to accommodate the Project’s peak parking demand. However, LAMC Section 12.21-A.5 requires that the parking standards codified in that section apply to “required or non-required parking stalls[.]” Any parking spaces purporting to be used to accommodate peak parking demand must be designed in compliance with LAMC Section 12.21-A.5. The 33 parking spaces, therefore, are in violation of the LAMC.

C. Long-Term Bicycle Parking Fails to Comply with LAMC Standards

LAMC Section 12.21-A.16(d)(2) establishes design standards for long-term bicycle parking and requires that all long-term bicycle parking shall be “enclosed on all sides and protect bicycles from inclement weather.” The Project plans show long-term bicycle parking on the roof with no accommodation for a roof over the long-term bicycle parking spaces. Furthermore, LAMC Section 12.21-A.16(e)(1)(iii)(e) requires that a workspace of 100 square feet shall be provided to allow bicyclists to maintain their bicycles. The Project plans fail to show the required workspace.

D. The Project Fails to Comply with Loading Space Standards

1. *The Project is Non-Compliant and Cannot Justify a Modification*

The Zoning Code establishes mandatory standards for the design, location and size of loading spaces. LAMC Section 12.21-A.6(a) provides that a loading space shall be located on every lot in a C Zone where the lot abuts upon an alley. Section 12.21-A.6(b) requires that every required loading space “shall be located and arranged that delivery vehicles may be driven upon or into said space from the alley.” The purpose of these standards is to ensure that delivery vehicles, which are far less maneuverable than passenger vehicles, have limited visibility and greater blind spots, and therefore contribute to hazardous or nuisance conditions by obstructing adjacent streets while maneuvering to access the loading space.

The Project’s loading space fails to comply with these standards because it is accessible from Orange Street, a designated Local Street, rather than the adjacent alley. Moreover, the loading space is not even *indirectly* accessible from the alley, as the primary vehicle entrance is also located in Orange Street with no access whatsoever from the alley. The location of *both* loading and vehicle access from Orange Street makes conflicts between delivery vehicles and passenger vehicles inevitable, resulting in cars backing up onto the San Vicente Boulevard frontage road or Orange Street. To make matters worse, the Project Description states that deliveries would occur “during normal operation hours for the medical offices” which exacerbates conflicts between delivery vehicles and passenger vehicles.

LAMC Section 12.21-A.6(g) authorizes LADBS to grant relief from loading space requirements only under narrowly defined conditions: “No loading space shall be required on unusually shaped lots, oddly located lots, or on hillside lots, when waived by the Department of Building and Safety as provided for in Sec. 12.26-B.” LAMC Section 12.26-B authorizes the LADBS to waive or modify loading space requirements “when such space cannot reasonably be provided or utilized.” It is beyond dispute that the Project site has sufficient space to reasonably provide a compliant loading space; the Project site is over 32,000 square feet after dedications, with dimensions measuring approximately 110 feet by 360 feet, providing ample room for a compliant loading space. In any event, modifications require an application to LADBS with

findings to justify the modification – findings which are entirely lacking here. The LADOT review letter stated that the loading space would be accessible from Orange Street because “geometric constraints prevent the adjacent alley from being used for truck access.” The letter never specifies what geometric constraint specifically precluded using the alley for truck access, rendering it impossible for the public to verify the basis for the modification. The one-sentence justification in Appendix J to the DEIR is demonstrably flawed as it states that “due to the existing geometric constraints and width of the alley, trucks would not be able to access the site via the alley and, thus, the Project proposes truck loading access on Orange Street.”¹ However, there is no dispute that the alley is already dedicated to the full 20-foot City standard, so the “width of the alley” is an implausible justification for a modification.

At this time, the DEIR fails to provide sufficient information to justify the modification and LADBS has not yet approved the modification. Nonetheless, even without a complete record justifying the Loading Space modification, an expert analysis from RK Engineering Group, Inc. is attached as **Exhibit 2** with two turning templates demonstrating that the Project site can be adequately accessed by trucks while complying with standard LADOT turning radius templates. As shown in the templates, trucks are able to access the alley without encroaching over the sidewalk, rendering a loading space on the alley may reasonably be provided and utilized. The Appellant reserves the right to appeal the issuance of any building permits waiving or modifying the required loading space.

2. The Loading Space on Orange Street Violates LADOT Policy

The Project proposes a loading space on Orange Street with two security gates regulating access, a northerly gate with no setback from the sidewalk on Orange Street and a southerly gate accessing the valet drop-off area. It is apparent from common sense that trucks will be unable to enter or exit the loading space via the southerly security gate, as they would be unable to complete tight turns to the “visitor exit” or to the “employee entrance/exit.” Thus, trucks would need to enter and exit from Orange Street. This configuration is in violation of the LADOT Manual of Policies and Procedures, Section VIII which states:

Back-in loading facilities may be permitted on commercially-developed local streets if off-street space is insufficient for truck maneuvering. These back-in loading facilities should have a minimum reservoir area of 45 feet back of sidewalk.

Here, the Project proposes a back-in loading space on a local street (Orange Street) which violates the LADOT Manual of Policies and Procedures (**Exhibit 3**) in two respects. First, the Project site manifestly has sufficient space for off-street truck maneuvering, as it is over 32,000 square feet after dedications, according to the City. Its dimensions are approximately 110 feet by

¹ Appendix J, p. 57.

360 feet, which provides ample room for an off-street truck turn-around. Second, the Project fails to provide a reservoir area at least 45 feet back from the sidewalk to ensure trucks will not obstruct the sidewalk, or double-park in Orange Street, while waiting for the security gate to be opened. This configuration is also in conflict with numerous Mobility Element policies prioritizing safe, accessible and usable sidewalks while minimizing vehicle and loading conflicts.

E. The Project Fails to Comply with Fire Department Regulations for Parking

The Project further fails to comply with Los Angeles Fire Department Requirement No. 74 (**Exhibit 4**) which imposes design standards on tandem parking mechanical car stackers such as those proposed in the Project. It requires that “each platform must be directly accessible from a main aisle, fire land, access aisle or side aisle.” Requirement No. 74 also would preclude use of the 33 unstriped parking spaces located in aisles, which the Applicant claims would provide sufficient parking to meet peak parking demand for the Project. As such, the Project is unable to legally provide this unstriped parking and any findings that the Project would not result in spillover parking into the neighborhood at peak hours are unsupported by substantial evidence. In particular, the Site Plan Review findings are unsupported by substantial evidence because the City’s findings relied on a conclusion that the Project would not result in spillover parking into the surrounding neighborhoods.

F. The Project Fails to Comply with Standards in Lieu of an Emergency Helicopter Landing

LAMC Section 57.4705.4 requires that each new high-rise building over 75 feet shall have a rooftop emergency helicopter landing facility. Los Angeles Fire Department Requirement Number 10 (**Exhibit 5**) provides that an emergency helicopter landing is not required if a high-rise complies with the standards in Option 1 and Option 2.

To begin, the City abuses its discretion by applying Requirement No. 10 to the Project without making site-specific findings of impracticability or hardship as required by LAMC Section 57.104.17. Additionally, Requirement Number 10 is not a validly adopted rule of general application because it was promulgated by the Fire Marshal, not the Board of Fire Commissioners as required by LAMC Section 57.104.1.1.1. Finally, any modification must be approved by the Los Angeles Board of Fire Commissioners, with a written report prepared by the Fire Marshal pursuant to LAMC Section 57.104.17.3 and may not be granted by an over-the-counter clearance by LAFD staff.

Crucially, the dense location of bicycle parking on the uppermost roof renders any alternative compliance *not* in conformance with the purposes of the Fire Code, as occupants would quickly obstruct the narrow walkways between bicycle parking enclosures and would become backed up in the stairwell, creating severe life safety risks which were specifically meant to be avoided by allowing an alternative to an emergency rooftop helicopter landing. Any waiver

of the rooftop helicopter landing must include specific calculations to ensure occupants can move across the roof during an emergency rather than become trapped by bicycle parking stalls and obstruct escape. The alternative compliance requirements in LAFD Requirement Number 10 does not contemplate occupants escaping to a roof filled to the brim with bicycle parking enclosures separated by just a few feet, and which are tall enough to obstruct vision across the roof to enable movement and escape. Furthermore, even if the roof is not used as a refuge during a fire, the standard in Requirement No. 10 to have two stairwells accessing the roof is intended to provide LAFD with some ability to access the structure even without a helicopter landing; this would not be possible with a roof fully occupied with bicycle parking. Additionally, the Project fails to comply with the standards in Option 1 and Option 2, both of which are required in lieu of a helicopter landing. In particular, the northerly stairwell provides no roof access.

Lacking calculations, structural plans and written justifications for the modification at this stage, Appellants reserve the right to review and appeal the issuance of building permits for improper waiver of the emergency helicopter landing.

G. The Project Fails to Provide Required Sidewalk Dedications

Per the Mobility Element of the General Plan,² San Vicente Boulevard is designated as a Boulevard II that would require a 40-foot half-width roadway within a 55-foot half-width right-of-way – essentially requiring a minimum 15 foot sidewalk width. The Standard Street Dimensions implementing the Mobility Element, Standard Plan S-470-1,³ requires a 110-foot right-of-way comprised of an 80-foot roadway and two 15-foot sidewalks. LAMC Section 12.37-A.6 provides:

For streets accompanied by a parallel frontage and/or service road and for streets designated as divided streets, existing roadway dimensions are deemed to be in compliance with the street standards and no additional dedication or improvement is required. A dedication for sidewalk improvement shall be required, however, as necessary to bring the abutting sidewalk dimension into compliance with the street standard.

Similar language is included in Note 10 of Standard Plan S-470-1:

STREETS THAT ARE ACCOMPANIED BY A PARALLEL FRONTAGE AND/OR SERVICE ROAD ARE DEEMED TO MEET THE STREET STANDARDS SET FORTH HEREIN AND THE DEDICATION REQUIREMENT SHALL BE NO MORE THAN IS

² Exhibit 6.

³ Exhibit 7.

NECESSARY TO BRING THE ABUTTING SIDEWALK DIMENSION INTO COMPLIANCE WITH THE STREET STANDARD.

A procedure to allow waivers of dedications is provided in LAMC Section 12.37-I.3, which states:

For projects that require a discretionary entitlement, an applicant shall file a waiver request as part of the master land use application or subdivider's statement for the project. In such case, the decision maker for the discretionary entitlement shall process the waiver request pursuant to the procedures established for the discretionary entitlement, but may only grant a waiver after making one of the required findings set forth in Subdivision 2.(b) above. The waiver request must be set forth in the application filed with the Department of City Planning, and may not be raised for the first time at the hearing on the entitlement or at any entitlement appeal hearing.

Here, the Project provides a 10-foot sidewalk dedicated for public use, as no additional dedications are provided along San Vicente Boulevard. The Project plans label a 10-foot, 2-inch sidewalk (on the west corner) and a 14-foot, 5 inch sidewalk (adjacent to the valet), which are still substandard and in violation of standards in the Mobility Element and LAMC Section 12.37-I. Yet, the Project fails to request relief from the sidewalk standards or make the legally required findings. Fatally, the Project did not request relief in its initial application and no relief may be granted upon appeal.

Recognizing that street and sidewalk dedications provide essential mobility infrastructure, the LAMC establishes strict findings to authorize a waiver of dedications, requiring a finding of one of the following:

- (1) The dedication or improvement requirement does not bear a reasonable relationship to any project impact.*
- (2) The dedication or improvement is not necessary to meet the City's mobility needs for the next 20 years based on guidelines the Streets Standards Committee has established.*
- (3) The dedication or improvement requirement is physically impractical.*

Furthermore, the Project's sidewalk in excess of 10 feet ***is not proposed to be dedicated for public use***. This is inconsistent with explicit mandates in the Mobility Element and the LAMC which require that right-of-way must be dedicated for public use in order to meet standard right-of-way widths. Standard Plan S-470-1, Footnote 9, requires "dedication" of areas necessary to complete the standard sidewalk width. Similarly, LAMC Section 12.37-C (Dedication Procedure) provides that such dedications shall be made by an "offer to dedicate." A privately owned sidewalk maintained within the boundaries of the approved Vesting Tentative Tract Map is not a "dedication" because the Applicant has not conveyed to the City a legal interest in this area for public street purposes, in particular for use as a sidewalk.

H. The Project Exceeds its Requested FAR After Required Dedications are Provided

LAMC Section 12.37-G requires that the FAR of a Project is calculated from the net lot area after accounting for all required dedications. The City Planning Commission approved a Zone and Height District Change to permit a maximum FAR of 4.5 to 1, permitting 145,305 square feet of Floor Area on a site with a net area after dedications of 32,290 square feet. The required dedications on San Vicente Boulevard would reduce the lot area by approximately 3,253 square feet,⁴ resulting in a net lot area of 29,037 square feet. An FAR of 4.5 to 1 on this net lot area would permit a maximum of 130,666 square feet of Floor Area, or 14,638 square feet less than proposed. The Project's proposed 145,305 square feet of Floor Area on a 29,037 square foot net lot area would yield an FAR exceeding 5 to 1. The City Council lacks authority to approve an FAR materially greater than that requested in the application and approved by the City Planning Commission. Approval of a greater FAR than described in the DEIR would also result in a fatally inaccurate Project Description in violation of CEQA.

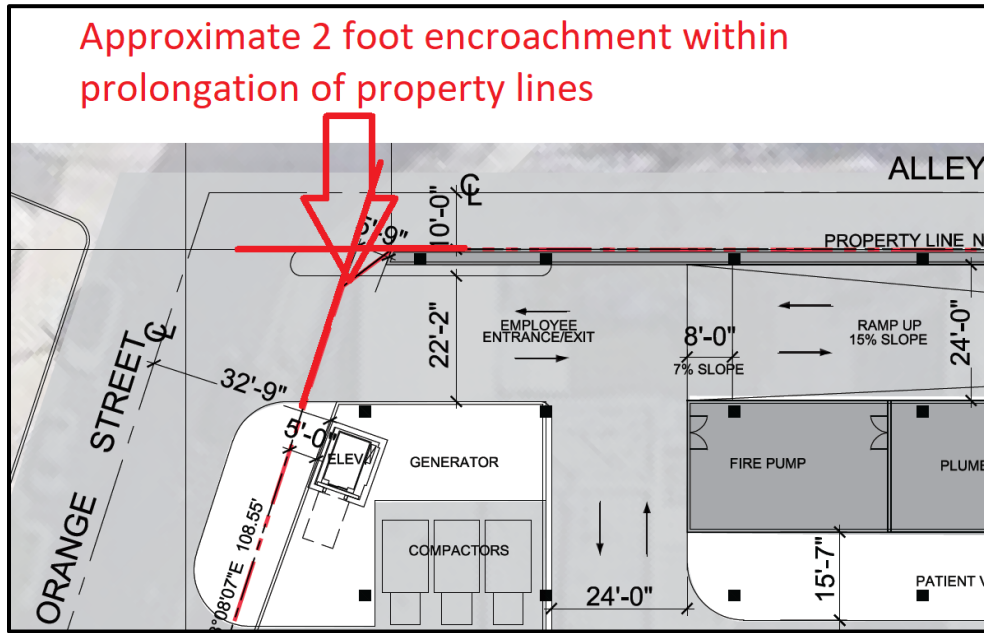
I. The Project's Driveway Locations Violate the LAMC

The LAMC prohibits the location of a driveway within a corner dedication. Section 62.105.1 provides:

No portion of a driveway shall be constructed between the prolonged intersecting property lines at any street or alley intersection, or between the points of curvature of any curb return having a radius of 20 feet or less.

Here, the Project locates its driveway in a prohibited location because a portion of the driveway is located within the prolongation of intersecting property lines of Orange Street and the alley. This presents yet another hazardous condition, as vehicles exiting the driveway would have blind spots obscuring visibility of vehicles coming from the alley.

⁴ The Project site has 360.65 linear feet of frontage on San Vicente Boulevard. 360.65 feet times 5 feet equals 3253.25 square feet.



Nor can this problem be resolved by locating the driveway further south on Orange Street, as LAMC Section 62.105.3 requires a minimum of 20 feet of curb space, excluding the curb return, between driveway approaches on the same street and serving the same lot. The Project's access and circulation plans conflict with basic site planning requirements establishing necessary dedications and driveway locations.

J. The Project Requires Approval of a Major Development Project CUP

LAMC Section 12.24-U.14 requires a Conditional Use Permit for any "Major Development Project" defined as a development otherwise permitted in the underlying zone with more than 100,000 square feet of non-residential Floor Area. Here, the Project proposes 145,305 square feet of non-residential Floor Area, exceeding the threshold to require a CUP.

On November 9, 2021, in Case No. CPC-2021-3512-VCZ-VCU, the City Planning Commission approved a Vesting Zone Change and Vesting Conditional Use Permit for a Major Development Project consisting of a 405,000 square-foot hospital within the C2 Zone.⁵ On May 16, 2020, in Case No. CPC-2019-6216-VZC-CU-CDP, the City Planning Commission approved a Vesting Zone Change and Conditional Use Permit for a Major Development Project consisting of a 258,500 square-foot hospital and supporting buildings in the C2 Zone.⁶ Hospital uses are permitted by-right in the C2 Zone with no limitation on the area of hospital development pursuant to LAMC Section 12.14-A.17.

⁵ Exhibit 8.

⁶ Exhibit 9.

On October 27, 2020, in Case No. CPC-2017-5090-VCU-CU-SPR, the City Planning Commission approved a Vesting Conditional Use Permit for a Major Development Project consisting of 556,557 square feet of office and 62,385 square feet of supporting sound stage and production space in the M1 Zone.⁷ The M1 Zone permits office uses by-right with no limitation on the area of office development by operation of LAMC Sections 12.17.6-A.2, 12.14-A.1(a)(1) and 12.13-A.2(a)(18).

On October 31, 2018, in Case No. CPC-2015-2025-DB-MCUP-CU-SPR, the City Planning Commission approved a Conditional Use Permit for a Major Development Project consisting of 308 hotel rooms and 190,000 square feet of commercial/retail uses in the C4 Zone.⁸ Commercial/retail uses are permitted by-right in the C4 Zone with no limitation on the area of commercial/retail uses by operation of LAMC Sections 12.16-A.2, 12.14-A.1(a)(1), 12.13.5-A.2(a) and 12.13.5-A.1, among other sections for specific uses. Furthermore, hotels are permitted by-right in the C4 Zone when not developed within 500 feet of an R-Zoned property (as was the case with the above-referenced entitlement) pursuant to LAMC Sections 12.16-A.2, 12.14-A.1(a)(1) and 12.13.5-A.11.

The above-referenced entitlements were approved for some of the largest developments proposed in the City of Los Angeles over the past decade. Their cases and required entitlements presumably underwent unparalleled scrutiny, both prior to filing and during case processing. Yet each Project was deemed to require a CUP for a Major Development Project. Furthermore, the City Planning Commission has not “dismissed as not necessary” requests for CUPs for Major Development Projects, as it has done for other entitlements.⁹

As the entitlements above demonstrate, the fact that office uses are permitted by-right in the underlying zone is irrelevant to determining whether a CUP for a Major Development Project is required. In fact, the authority to permit a Major Development Project CUP ***extends only to uses which are permitted by-right in the underlying zone.*** LAMC Section 12.24-U.14 authorizes approval of a CUP for:

“Major” development projects, otherwise permitted by right in the zone(s) in which they are located and in compliance with the limitations and regulations of this article.

The definition of Major Development Project within Section 12.24-U.14 leaves no room for ambiguity, as its plain language applies to the development of 100,000 square feet or more of Floor Area of “non-residential” uses in the C2 Zone. The remainder of Section 12.24-U.14 addresses procedures and thresholds for other specified uses, such as Warehouses (subject of a

⁷ Exhibit 10.

⁸ Exhibit 11.

⁹ See Case Nos. CPC-2017-3854-VZC-ZV-CU-ZAD-SPR (Exh. 12); CPC-2014-2947-TDR-ZC-ZV-CDO-SPR (Exh. 13); and CPC-2013-3262-ZC-HD-PUB-ZV-ZAA-SPR (Exh. 14)

250,000 square foot threshold), Home Improvement Stores (subject to a 100,000 square foot threshold) or Superstores (subject to a 100,000 square foot threshold), yet the catch-all threshold for “non-residential” uses can have no reasonable interpretation other than to include office uses, such as those proposed by the Project. Therefore, the Project requires approval of a CUP for a Major Development Project.

K. The Site Plan Review Findings Lack Substantial Evidence

Site Plan Review approval requires a finding that “the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan and any applicable specific plan.” Here, the Project is in direct conflict with the mandates of the Mobility Element of the General Plan to provide adequate sidewalks to facilitate non-motorized transportation. The Project also fails to provide required parking spaces for both bicycles and automobiles, further undermining compliance with the General Plan, Mobility Element and Zoning Code. Additionally, the Project’s inadequate loading space and lack of a reservoir between the sidewalk and the security gate conflicts with the Mobility Element.

Site Plan Review approval further requires that the Project provides off-street parking and loading space facilities to be compatible with existing and future development on adjacent properties and neighboring properties. As demonstrated above, the Project’s loading space is non-compliant and dysfunctional, requiring trucks to back onto Orange Street. Furthermore, according to the Project applicant’s letter to the City dated February 14, 2022, the Project has a peak parking demand of 422 parking spaces which would be accommodated with the Project’s 418 striped/stacked spaces and 33 unstriped or aisle spaces. As noted above, the Project includes 16 parking spaces which are noncompliant and the 33 unstriped spaces may not be used to accommodate peak parking demand. As such, the Project has only 402 parking spaces to accommodate a peak parking demand of 422 parking spaces. The Site Plan Review findings fail to provide substantial evidence supporting its conclusion that the Project will accommodate peak parking demand, and fails to address the reality that vehicles will necessarily overflow into the neighborhood. Therefore, the City failed to provide an analytical path supporting its conclusions and the required finding.

Site Plan Review approval also requires that the Project provide “other such pertinent improvements” in addition to off-street parking and loading facilities to ensure the Project will be compatible with existing and future developments on adjacent properties and neighboring properties. Here, the City has failed to conduct a queuing analysis to ensure that sufficient space is available to accommodate vehicles using the valet. As noted in the February 24, 2022 transportation and parking review from RK Engineering Group, Inc., the proper methodology for conducting a queuing analysis ensure that the Project provides sufficient queuing space for the 95th percentile of valet queuing demand. The City failed to consider that the valet operators would be performing valet services not just for employees and visitors, but also bicyclists.

Without performing a queuing analysis and identifying the minimum number of valet operators and queuing length, the City cannot possibly substantiate the required Site Plan Review findings.

L. The Vesting Tentative Tract Map Findings Lack Substantial Evidence

LAMC Section 17.05-D requires that all streets and alleys shall be designed to conform with adopted street standards, unless a waiver is requested at the time of application consistent with LAMC Section 12.37. Here, the Project fails to provide compliant street dedications and failed to request a waiver, making an affirmative finding supporting approval of the Vesting Tentative Tract Map impossible. Additionally, the Project site is not suitable for the proposed type and density of development because its location on a frontage road uniquely increases the severity of neighborhood intrusion traffic impacts.

M. The D Limitations Violate the LAMC

The Project is subject to permanent D Limitations restricting the height and Floor Area of the structure. D Limitation 1 provides:

The total floor area over the Project Site shall not exceed a 4.5 to 1 floor area ratio (FAR) or a total of 145,305 square feet. The FAR may be increased if: above-ground parking areas are repurposed to commercial uses and the site's FAR does not exceed 6:1, subject to any applicable CEQA review and implementation.

Here, the Project has omitted required dedications from its calculations of net lot area, resulting in an underestimation of the Project's actual FAR. As noted above, after including sidewalk dedications, the Project's 145,305 square feet of Floor Area would result in an FAR of 5.0 to 1. The D Limitation provides that the total floor area shall not exceed 4.5 to 1 "***or a total of 145,305 square feet***" – purporting to authorize an FAR over 4.5 to 1 if net lot area was miscalculated. Approval of an FAR of 5 to 1 would violate LAMC Section 12.32-G.4(a) because the City's authority to impose a D Limitation is limited to restrictions on (i) maximum height; (ii) maximum FAR; (iii) lot coverage; and (iv) building setbacks. The City has no authority to impose a D Limitation allowing a greater FAR than specified in the D Limitation by stating a specific approved Floor Area.

N. The Project Must be Made Compliant Before City Council Approval

Site Plan Review Condition of Approval 1 and (Q) Condition 1 require that the "use and development of the property shall be in substantial conformance with the plans submitted with the application and marked Exhibit A, dated June 23, 2022." As noted above, the Project is noncompliant with the LAMC in numerous ways and may not have permits issued without correcting these deficiencies. However, these conditions further state: "Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions."

Correcting the deficiencies identified herein would exceed the scope of a “minor deviation” and would require a new Site Plan Review application and amendment of the (Q) Conditions to proceed. To avoid the requirement for an entirely new application, all deficiencies must be resolved before the Project is approved by the City Council.

II. THE PROJECT VIOLATES CEQA

A. The Project Description is Inadequate

1. The Project Description Fails to Identify Required Discretionary Approvals

CEQA Guidelines Section 15124 requires that a Project Description shall include certain mandatory information about the proposed development, including a “list of permits and other approvals required to implement the project.” Here, the Project description identifies only four required approvals: the General Plan Amendment, the Vesting Zone and Height District Change, Site Plan Review and the Vesting Tentative Tract Map. However, as noted above, the Project fails to comply with the LAMC and General Plan standards for dedications and driveway locations and therefore requires the following additional approvals:

- Pursuant to LAMC Section 12.24-U.14, a Conditional Use Permit for a Major Development Project consisting of the construction of more than 100,000 square feet of non-residential Floor Area in the C2 Zone;
- Pursuant to LAMC Section 12.37-I, a Waiver of Dedication to reduce the sidewalk width on San Vicente Boulevard (Boulevard II) to 10 feet, 2 inches in lieu of 15 feet as required by Standard Plan S-470-1;
- Pursuant to LAMC Section 12.26-B, a Loading Space Modification to locate the loading space on Orange Drive rather than from the alley as required by LAMC Section 12.21-C.6;
- Pursuant to LAMC Section 62.105.5, a Driveway Modification to locate a driveway between the prolonged intersecting property lines at an intersection of Orange Street and the alley as prohibited by LAMC Section 62.105.1(a); and
- Pursuant to LAMC Section 57.104.17, an Emergency Helicopter Landing Facility Modification to waive the required Emergency Helicopter Landing Facility required by LAMC Section 57.4705.4.

The failure to identify these requirements is an error and abuse of discretion as it violates mandatory requirements in the CEQA Guidelines detailing what information must be included in an EIR. Furthermore, this error was prejudicial because neither the public nor the elected officials responsible for evaluating the Project are aware that it does not comply with core land use regulations such as dedications, sidewalk width and driveway location. The failure to comply with these regulations gives rise to hazardous conditions with blind corners. Furthermore, the substandard sidewalk conflicts with the City’s findings that the Project provides pedestrian-

oriented development when it in fact degrades the pedestrian environment with impermissibly narrow sidewalks.

The City's failure to identify required entitlements is especially prejudicial because the public is unable to challenge the findings that would be required for these approvals or relate the necessary deviations to consistency with Mobility Element policies regarding providing adequate pedestrian facilities (Policy 2.3) and providing adequate off-street loading areas (Policy 2.10).

Furthermore, the City's failure to identify the waiver of the Emergency Helicopter Landing Facility requirement has shielded the Project from scrutiny for one of the highest-stakes impacts conceivable, in which a fire in a crowded medical facility – occupied by elderly persons, persons of frail health and persons with limited mobility – would attempt to escape to the roof, only to be caught in a stampede as fleeing occupants would become obstructed by the dense bicycle parking enclosures located on the roof. The Project's compliance with the Fire Code, and the justifications for its waiver of the Emergency Helicopter Landing Facility, must be disclosed and articulated to understand the Project's Land Use, Hazards and Hazardous Materials and Public Services.

Finally, the Project description is inadequate because it fails to specify the measures to be considered as part of the Neighborhood Traffic Management Program (NTMP). Condition of Approval 16 to the Zone Change case requires funding an NTMP, and further states:

Typical NTM physical measures may include, but are not limited to, traffic circles, speed humps, installation of barriers, speed tables, chicanes, chokers, roadway narrowing effects (raised medians, etc.), landscaping features, roadway striping changes, and or operational measures such as turn restrictions, speed limits, and installation of stop signs.

The installation of any turn restriction or barrier needs to be disclosed in the Project Description because it would necessarily have implications for VMT and, therefore, impact air quality analysis. Turn restrictions or barriers would cause vehicles to take longer trips to reach or depart from the Project site. In addition, turn restrictions or barriers would increase the VMT of vehicles already on the road, rendering the VMT threshold of significance unreliable as applied to the Project.

2. The Neighborhood Traffic Management Program Condition is Illusory

Condition of Approval 16 to the Zone Change case provides that the Project shall “fund implementation of an NTMP, up to an amount not to exceed \$100,000.” ***This Condition would be satisfied by the Project applicant giving nothing***, as a zero dollar contribution meets the requirement to provide “up to an amount not to exceed \$100,000.” The Council should revise

this condition to ensure that the community's trust is not betrayed after the applicant has secured Project approval.

3. *The Project Lacks Sufficient Detail to Determine Cumulative Impacts on Fire Response Infrastructure*

The DEIR observes that the Project site is located outside of the recommended proximity to truck and engine fire companies based on its use, noting that the nearest stations are 1.9, 2.0 and 3.1 miles from the Project site. In addition, the service letter from LAFD dated September 24, 2020 notes that response distance would be considered inadequate, requiring the installation of an automatic fire sprinkler system, and concluded that the cumulative impact of the Project and other proposed and approved developments in the area could require construction of new fire facilities or relocation of existing fire facilities:

The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following:

- 1. Increased staffing for existing facilities. (I.E, Paramedic Rescue Ambulance and EMT Rescue Ambulance resources).*
- 2. Additional fire protection facilities.*
- 3. Relocation of present fire protection facilities*

However, the Project applicant failed to submit sufficient information to enable LAFD to determine whether the Project would, in fact, require construction or relocation of facilities. Even a cursory level of additional detail, such as describing occupant loads for the structure, would have assisted LAFD in this determination. There is no reason to postpone formulation of Project details necessary to make this determination. Instead, the Project applicant is shielding the extent of fire infrastructure impacts behind the vagueness of architectural plans which LAFD is unable to fully evaluate.

4. *The Project Description Fails to Describe the Effect of the Zone Change from C1 to C2*

CEQA Guidelines section 15124 requires that an EIR's project description "shall contain" prescribed information including a "general description of the project's technical, economic, and environmental characteristics" and a "list of permits and other approvals required to implement the project." The DEIR is deficient because it fails to provide a general description of the Zone Change from C1 to C2, omitting any discussion of the land use regulations implicated by this Zone Change. Instead, the Project Description and Land Use analysis focuses exclusively on the *Height District Change* from Height District 1 to Height District 2 which would allow a maximum FAR not to exceed 6 to 1:

- *“Pursuant to LAMC Sections 12.32 F, P and Q, a Vesting Zone Change and Height District Change from C1-IVL-O to (Q)C2-2D-O to allow for an FAR of 4.5:1 and up to a 20 percent reduction in vehicle parking.” (DEIR, p. II-20)*
- *“The Project Site is zoned C1-IVL-O. The C1 in the zoning designation indicates limited commercial uses and generally permits commercial and retail uses. The “IVL” indicates Height District IVL, which is a Very Limited Height District that, in combination with the C1 Zone, allows for three stories and 45 feet in height, and an FAR of 1.5:1.” (DEIR, p. IV.F-12)*

Crucially, the C1 Zone (but not the C2 Zone) requires a Front Yard of 10 feet and a Side Yard measuring 10 percent of Lot Width, not to exceed 5 feet, with an additional foot required for each story above the second story, not to exceed 16 feet. Applied to the Project site, this requires a 10 foot Front Yard on Orange Street (the narrowest frontage per LAMC Section 12.03) and a 15-foot Side Yard.¹⁰

These required yards are deducted from Buildable Area calculations of the C1 Zone (but not the C2 Zone) per LAMC Section 12.03. The 10-foot Front Yard would reduce Buildable Area by approximately 1,080 square feet¹¹ and the 15-foot Side Yard would reduce Buildable Area by approximately 5,400 square feet.¹² Subtracting these figures from the net area after dedications of 32,290 (as erroneously calculated in the DEIR), the Buildable Area of the Project site is 25,810 square feet.

Thus, the Zone Change from C1 to C2 increases the Buildable Area of the Project site by 25 percent¹³ -- a fact which is omitted entirely from the DEIR. A 4.5 to 1 FAR on the same Buildable Area within the C1 Zone would allow only 116,145 square feet of Floor Area, compared to the Project’s 145,305 square feet of Floor Area. This is an increase of over 29,000 square feet of Floor Area which is obfuscated and hidden from public scrutiny. The Zone Change therefore represents a stealth FAR increase which was improperly omitted from the Project Description and Land Use analysis.

¹⁰ The Side Yard is 10 percent of lot the 110-foot lot width is 10 feet, reduced to 5 feet, plus 10 feet for the 10 stories over the second story, requiring a 15-foot Side Yard.

¹¹ 10 feet times 108.71 linear feet of frontage on Orange Street.

¹² 15 feet times 360 linear feet of frontage on San Vicente Boulevard.

¹³ 32,290 divided by 25,810 equals 1.25.

5. *The Project Fails to Describe Site Work to Address the Existing Storm Drain*

The Project proposes construction of a high-rise medical office building on top of a 14-foot-wide City storm drain easement with an active 102-inch rectangular storm drain. The Bureau of Engineering noted in a Recommendation Report dated February 7, 2022:

The vesting tentative tract does not specify if this existing storm drain easement and the system will remain or will be abandoned and replaced by a new storm drain easement and system.

In response to repeated inquiries from the Project applicant throughout February and March of 2022, Quyen Phan, the Engineer responsible for Tentative and Tract Maps stated:

As a City policy, the applicant cannot build over the existing City storm drain easement. The map submitted does not show if the applicant is proposing to abandon and replace it with the new drain easement. It is not sufficient to BOE.

Senior City Planner Milena Zasadzien, responsible for developments within the Central Area, responded to Ms. Phan:

*Thanks for providing clarification on the issue. Paul and I talked and **we understand the requirement to identify access and where the underground infrastructure would need to be relocated. This seems to be a fairly significant piece of infrastructure.***

Despite the Senior City Planner acknowledging that she “understands” that the storm drain would “need to be relocated,” there is no mention of this in the Final EIR to make the public aware of the change in the scope of the Project. Relocation of a 102-inch storm drain would require extensive work in the public right-of-way, exacerbating construction impacts from the Project, and necessitating grading and excavation with air quality and GHG impacts not analyzed in the DEIR.

Once again, the Project applicant – aided by senior City Planning officials – is concealing crucial information on the scope of the Project from the public. Lacking information on the extent of excavation, hauling, re-compaction and disruption of public rights-of-way, the Association intends to appeal the issuance of any permit exceeding the scope of the Project analyzed in the DEIR. The Project necessitates construction of a “fairly significant piece of infrastructure,” yet the City and Project applicant are conspiring to hide this information from the public in direct violation of CEQA’s mandates to provide a full and complete disclosure of the Project. The requirement to relocate and reconstruct a major storm drain would further constitute significant new information requiring recirculation of the DEIR.

6. *A Revised Project Compliant with the LAMC Requires Recirculation of the EIR*

As noted above, the Project violates the LAMC in numerous respects, including inadequate dedications, insufficient bicycle and vehicle parking and improperly modified loading space and helicopter landings. Bringing the Project into compliance with the LAMC would require significant changes in the Project with material impacts on its environmental impacts. A revised Project compliant with the LAMC and providing the required Project details must be presented to the public for approval and scrutiny to ensure compliance with CEQA's core public policies supporting public disclosure and guaranteeing public faith in the integrity of environmental approvals.

B. The Project Causes Significant Transportation Impacts

1. *The Transportation Analysis is Deficient*

The Association previously submitted an expert letter from RK Engineering Group, Inc. which identified numerous deficiencies in the DEIR and Appendix J, including the following: (1) the design of the site plan with respect to the operation/design of the valet system, (2) the traffic counts utilized in the traffic assessment, the poor operating conditions (LOS F) at the intersection of San Vicente Boulevard at Wilshire Boulevard, (3) no significant improvements planned to the adjoining roads or the intersection, (4) the underestimating of the parking demand at the project, (5) the project's effects on the local neighborhood and along the San Vicente Boulevard Frontage Road at Wilshire Boulevard and 6th Street, (6) the need for specific neighborhood traffic calming improvements on Orange Street (a local street), (7) the underestimating of parking demand for this size of project with its impacts to the adjoining neighborhoods, (8) the lack of specific commitments for the TDM Plan and (9) the lack of any detail on how the construction impacts of the project will be resolved, in particular how the parking for workers/delivery services will be accommodated since the entire site will be under construction and there will be limited or no available space for accommodating these needs within the project. These items need to be addressed and resolved before the Project is considered for approval since it may result in a substantially different project design.

2. *The Project Conflicts with Circulation Policies*

Threshold of Significance (a) addresses whether the Project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As identified above, the Project provides inadequate dedications, vehicle parking and bicycle parking, fails to provide compliant loading space and improperly locates its driveways. As a result of these deficiencies, the Project would fail to advance core policies promoting non-vehicular transportation, ensuring that the public right-of-way is not obstructed by trucks maneuvering into ill-conceived loading spaces and providing for the safe location of driveways to ensure visibility and comfort for pedestrians.

C. The DEIR Conceals Significant Emergency Response Impacts and Omits Inevitable Construction of New LAFD Facilities

The DEIR recognizes that the Project site is located in a part of the City already underserved by emergency medical service (“EMS”) facilities. Table IV.H.1-3 identifies an average EMS response time of 7:03 for Fire Station 58 and 6:58 for Fire Station 61, while the DEIR states that the Citywide average EMS response time is 6:39. The DEIR avoids an honest reckoning with the need for new EMS facilities by asserting that LAFD has not formally established EMS response time standards, such as the 5-minute EMS standard adopted by the National Fire Protection Association, and that therefore it cannot determine whether the construction of new EMS facilities would be required. The DEIR fails to make a good faith effort to estimate the degradation of EMS response time caused by the Project and related developments, and thereby avoids analysis of the environmental impacts of construction of new fire/EMS facilities necessitated by these projects.

The DEIR identifies 17 related development projects adding a total of 13,651 daily trips to a chronically congested area of the City. The Project and related projects would cause substantial additional delays at the nine intersections reviewed in Appendix J. As summarized below, the cumulative delays caused at studied intersections caused by the Project and related projects reach up to 8 seconds (at Sweetzer Avenue and 6th Street), 13.7 seconds (at La Cienega Boulevard and Wilshire Boulevard) and 14.2 seconds at San Vicente Boulevard and Wilshire Boulevard).

<u>Cumulative Delays at Studied Intersections</u>				
Intersection	Peak	Current Delay	Cumulative Delay	Cumulative Change
San Vicente / 6 th	AM	16.1	21.3	+5.2
	PM	9.8	14.6	+4.8
Sweetzer / 6 th	AM	6.1	6.9	+0.8
	PM	6.8	14.8	+8.0
La Jolla / 6 th	AM	16.3	17.8	+1.5
	PM	10.4	10.8	+0.4
La Cienega / Wilshire	AM	35.9	46.0	+10.1
	PM	37.4	51.1	+13.7
San Vicente / Wilshire	AM	39.4	53.6	+14.2
	PM	40.5	45.8	+5.3
La Jolla / Wilshire	AM	9.8	11.5	+1.7
	PM	8.2	10.8	+2.6
McCarthy / San Vicente	AM	32.7	38.4	+5.7
	PM	27.1	33.4	+6.3
San Vicente / Orange	AM	8.8	9.2	+0.4
	PM	8.6	9.2	+0.6
Sweetzer / Orange	AM	9.5	11.3	+1.8
	PM	9.8	15.1	+5.3

The tables below makes reasonable estimate of the EMS response time delays caused by the Project and relayed projects. “Route 1” estimates an EMS response route from Station 58 traveling along Robertson Boulevard and Wilshire Boulevard to the Project site. “Route 2” estimates an EMS response route from Station 58 along Robertson Boulevard, Olympic Boulevard and Wilshire Boulevard to the Project site.

<u>Cumulative Increase in EMS Delay</u>		
Station 58 (Route 1)		
<i>Current Average Response Time 7:03</i>		
Intersection	Peak	Added Delay
La Cienega / Wilshire	AM	+10.1
	PM	+13.7
San Vicente / Wilshire	AM	+14.2
	PM	+5.3
Cumulative Added	AM	+34.3
	PM	+19.0
Cumulative Response	AM	7:37.3
	PM	7:22.0
% Greater than NFPA	AM	475.3/300 = 58.4%
	PM	442/300 = 47.3%
% Greater than Avg.	AM	475.3/399 = 19.1%
	PM	442/399 = 10.7%

<u>Cumulative Increase in EMS Delay</u>		
Station 58 (Route 2)		
<i>Current Average Response Time 7:03</i>		
Intersection	Peak	Added Delay
La Cienega / Wilshire	AM	+10.1
	PM	+13.7
San Vicente / Wilshire	AM	+14.2
	PM	+5.3
Cumulative Added	AM	+24.3
	PM	+19.0
Cumulative Response	AM	7:22.3
	PM	7:17.0
% Greater than NFPA	AM	332.3/300 = 47.3%
	PM	437/300 = 45.6%
% Greater than Avg.	AM	442.3/399 = 10.8%
	PM	437/399 = 9.5%

As these tables demonstrate, the Project and related Projects would increase average EMS response times to the Project site to levels comparable to no other urbanized area of the City. Compared to the NFPA recommended standard of a 5-minute EMS response, the Project and related projects would result in response times ***between 45 and 58 percent longer*** than the NFPA standard. Compared to the City average of a 6-minute, 58-second EMS response, the

Project and related projects would result in response times *between 9 and 19 percent longer* than the City average.

The DEIR makes two facially implausible arguments for why EMS response times are not significantly affected by congestion. First, the DEIR states that “multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle.” This is certainly not the case for the intersections of Wilshire Boulevard with San Vicente Boulevard and La Cienega Boulevard, which are operating at LOS D and F, respectively. The level of congestion suffered on these arterials prevents vehicles from maneuvering out of the path of emergency vehicles, as each lane is backed up with multiple vehicles obstructing emergency access. Furthermore, the presence of raised medians on Wilshire Boulevard and San Vicente Boulevard precludes vehicles or emergency response vehicles from briefly maneuvering into oncoming lanes to bypass gridlock. Second, the DEIR states that its Fire Preemption System automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response. However, once again, the congestion at intersections operating at LOS D and F renders this system ineffective, as gridlock at successive intersections obstructs emergency response regardless of signal priority.

Finally, the DEIR asserts that response time is just “one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergency, including required fire flow, response distance from existing fire stations, and the LAFD’s judgment for needs in an area.” However, fire flow is irrelevant to EMS service. Furthermore, distance from existing fire stations is not *independently* relevant to EMS service, other than being a factor into response times. The only relevant factor according to the DEIR’s analysis is “LAFD’s judgment for needs in an area,” yet it would be hard to conceive of an area where adequate EMS service could be more essential than a highly urbanized area of the City where numerous medical office and regional healthcare facilities are located, concentrating EMS demand in an area with woefully inadequate service.

The relevant facts to determine the need for additional facilities are all known to the City, and LAFD has specifically stated that inadequate fire and EMS service requires new personnel or construction of new fire and EMS facilities. However, the City as lead agency cannot hide behind its own department’s failure to render a decision on how to address inadequate fire and EMS service. Construction of a new LAFD facility would have substantial demolition and construction impacts ranging from air quality to noise and GHG. Thus, the DEIR fails to make a good faith effort to estimate the Project’s impacts and therefore fails as an informational document.

Independently, CEQA requires assessment of the effects of the Project on the environment, including how that changed environment impacts humans. Approval of the Project and related projects will degrade already-inadequate EMS service by exacerbating congestion and obstructing emergency response, with grave implications for persons needing emergency

medical service. The DEIR further fails as an informational document by failing to quantify EMS delays and translate this reduction in service to an understandable metric, such as a mortality rate or other measure of the adequacy of EMS response.

III. Conclusion

The Association respectfully requests that the Project be denied for the reasons identified above. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall", written in a cursive style.

Jamie T. Hall

EXHIBIT 1

PARKING DESIGN

I. GENERAL REQUIREMENTS

A. STALL WIDTHS

1. Minimum 8 ft 6 inches wide for standard stalls serving dwelling units.
2. Minimum 8 ft 4 inches wide for all other standard stalls.
3. Minimum 8 ft 0 inches wide for all parallel parking standard stalls.
4. Minimum 7 ft 6 inches wide for all compact stalls.
5. For disabled access stall widths and other requirements, refer to Information Bulletin P/BC 2020-084.
6. Stall widths must be increased 10 inches for obstructions, except for stalls serving single family dwellings and duplexes, as shown in Figures 8 & 9 and shall be increased for end stall conditions as shown in Figures 2 and 3 in section N. For purposes of determining increases for obstructions, property lines shall be considered as obstructions. No increase for obstructions is required for parallel parking stalls.

B. STALL DEPTHS

1. Minimum 18 feet deep for all standard stalls.
2. Minimum 15 feet deep for all compact stalls.
3. Minimum 26 feet deep for all standard parallel stalls and 30 feet deep for end parallel stalls.
4. Minimum 23 feet deep for all compact parallel stalls and 27 feet deep for end parallel stalls.

C. COMPACT PARKING SPACES PERMITTED

In parking areas or garages containing 10 or more spaces for other than dwelling uses, up to 40% of the total required parking spaces and 100% of the non-required parking spaces may be compact. For dwelling uses, all parking stalls in excess of one stall per unit may be compact. Unless specified otherwise, required guest parking spaces may be compact spaces.

D. ACCESS AISLE AND PARKING BAY WIDTHS

1. The basic access aisle and parking bay widths for compact and standard stalls are shown in Tables 1 through 6.

2. Parking bay dimensions shall be determined using the required basic stall width before required increases for obstructions. Where required and non-required stalls are intermixed in a bay, the width of the bay shall be the larger of the bay widths shown in the tables for the required and non-required stalls. Where single access is provided for both entrance and exit to a parking bay and the bay contains 25 stalls or less, the bay may be designed using one-way traffic tables. Where the number of stalls exceeds 25 and single access for entrance is provided, the bay widths shall be determined using the two-way traffic tables.

E. TANDEM PARKING STALLS

1. Tandem parking stalls are permitted in public garages and public parking areas providing an attendant. A "Covenant and Agreement to Provide Parking Attendant" will be required.
2. Tandem stalls are permitted in private parking garages and private parking areas provided:
 - a. At least one parking stall per dwelling unit and all stalls required for any guest parking shall be individually and easily accessible.
 - b. At least one standard stall per dwelling unit shall be provided.
3. Tandem parking shall be limited to a maximum of two cars in depth, in a private garage or private parking area, except for additional parking required in accordance with Section 12.21A17(h) or 12.21C10(g)(4).
4. When determining access aisle widths for tandem parking having both standard and compact stalls in tandem, the aisle widths for standard stalls shall be used.

F. PARKING STALL LOCATION

1. Each parking stall shall be so located that no automobile is required to back into any public street or sidewalk to leave the parking stall, parking bay, or driveway, except where such parking stalls, parking bays, or driveways serve not more than two dwelling units and where the driveway access is to a street other than a major or secondary highway.
2. No automobile parking space shall be provided or maintained within the required front yard of an A or R zoned lot except for additional parking provided in accordance with Sections 12.21A17(h) or 12.21C10(g)(2).
3. No parking stall may be located within a 5 foot side yard along the side street lot line of an A or R zoned corner lot.

G. DRIVEWAY WIDTHS AND LOCATIONS

1. Department of Transportation approval for the location of the driveways shall be obtained on lots located in a P (including any combination with an A or R Zone) or PB Zone, for all residential driveways serving two or more dwelling units which front on major and secondary highways and for all new driveways serving all other uses.
2. 9 ft. minimum in the A, RE, RS, R1, RU, RZ, R2, RMP and RW Zones.
3. 10 ft. minimum in all other zones and when serving an apartment house in the R2 Zone.

4. 19 ft. minimum when serving more than 25 cars or, in lieu thereof, there shall be two 10 ft. minimum wide driveways.
5. Not more than 50% of a required front yard shall be designed, improved or used for access driveways unless the lot is developed with a building meeting the requirements of Section 12.08.3B1 (RZ Zone requirements).

H. SLOPES FOR DRIVEWAYS, RAMPS AND STALLS

1. 20% maximum slope on driveway or ramp.
2. 10% maximum cross slope of a driveway or ramp.
3. 6.67% maximum slope in any direction in a parking stall.
4. Transition slopes are required when the slope of the driveway or ramp exceeds 12.5%. See Figures 11A and 11B for acceptable transition slope designs.

I. GARAGE DESIGN

1. DOOR OPENING WIDTHS

- a. The required garage door opening width shall be increased in the event the stall widths are increased in order to accommodate a reduced access aisle width.

Exception: The required garage door opening width for a one car garage serving single family dwellings, duplexes and garages serving individual units shall be 8 feet minimum.

- b. The required garage door opening width for a two car garage serving single family dwellings, duplexes and garages serving individual units shall be 16 feet minimum.
- c. The opening shall be equal to the required stall width less 8 inches for a one car garage and the required stall width multiplied by 2, less 16 inches for a two car garage.
- d. The required garage door opening width for all other garages shall be equal to the required driveway width or stall width whichever is greater.

2. CLEAR HEIGHT IN GARAGE

- a. All parking garages shall have an unobstructed headroom clearance of not less than 7 feet above the finished floor to any ceiling, beam, pipe or similar obstruction.
- b. All entrances to and vertical clearances within parking structures shall have a minimum vertical clearance of 8 feet 2 inches where required for accessibility to parking spaces for persons with physical disabilities.

J. PAVING, LANDSCAPING, AND CAR STOPS

1. Every parking area and parking garage including access driveways thereto, shall be paved with hard, durable asphaltic paving which has been mixed at a plant and is at least two inches thick after compaction or with portland cement paving at least three inches thick. **Exception:** Access driveways to the areas referenced above may be paved with a permeable material such as pavers, porous concrete, a combination of 45% concrete and 55% holes filled with grass distributed uniformly (commonly known as grasscrete), or any material deemed equivalent by the Department of City Planning.
2. All areas shall have appropriate bumper guards, wheel stops, steel posts, walls, curbs, suitable landscaping, or other installations adequate to prevent vehicles from parking or maneuvering on those portions of a lot upon which a driveway or parking area is prohibited, or into a public right of way, or where those portions of a lot are needed to prevent encroachment on walkways or adjoining properties.
3. All portions of a required front yard shall be landscaped as required by LAMC Section 12.21C1(g). A City Planning approval is required for all such landscaped areas in the RD, R3, RAS3, R4, RAS4, R5, or C zones, and when landscaping is required by any other provision of the LAMC.

K. INTERNAL CIRCULATION

All portions of a public parking area or public garage shall be accessible to all other portions thereof without requiring the use of any public street, unless the Department of Transportation determines that such use is not detrimental to the flow of traffic.

TABLE 1: STANDARD CARS - PARKING BAY WIDTHS FOR ONE-WAY TRAFFIC * AND DOUBLE LOADED AISLES, BASED ON CHART NO. 1 IN ORDINANCE NO. 142,306

Parking Angle	8'-4" Stalls	8'-6" Stalls	8'-8" Stalls	8'-10" Stalls	9'-0" Stalls	9'-2" Stalls	9'-4" Stalls
30	43'-0"	43'-0"	43'-0"	43'-0"	43'-0"	43'-0"	43'-0"
32.5	44'-2"	44'-2"	44'-2"	44'-2"	44'-2"	44'-2"	44'-2"
35	45'-3"	45'-3"	45'-3"	45'-3"	45'-3"	45'-3"	45'-3"
37.5	46'-3"	46'-3"	46'-3"	46'-3"	46'-3"	46'-3"	46'-3"
40	47'-4"	47'-0"	47'-0"	47'-0"	47'-0"	47'-0"	47'-0"
42.5	48'-10"	48'-4"	47'-10"	47'-8"	47'-8"	47'-8"	47'-8"
45	50'-3"	49'-10"	49'-5"	49'-0"	48'-7"	48'-5"	48'-5"
47.5	51'-6"	51'-1"	50'-8"	50'-3"	49'-10"	49'-5"	49'-0"
50	52'-8"	52'-3"	51'-10"	51'-5"	51'-0"	50'-6"	50'-1"
52.5	53'-8"	53'-3"	52'-10"	52'-5"	52'-0"	51'-6"	51'-1"
55	54'-7"	54'-2"	53'-9"	53'-4"	52'-11"	52'-5"	52'-0"
57.5	55'-6"	55'-0"	54'-7"	54'-1"	53'-8"	53'-2"	52'-9"
60	56'-5"	55'-11"	55'-5"	55'-0"	54'-8"	54'-0"	53'-7"
62.5	57'-4"	56'-10"	56'-4"	55'-10"	55'-4"	54'-9"	54'-5"
65	58'-2"	57'-8"	57'-2"	56'-8"	56'-2"	55'-8"	55'-2"
67.5	58'-10"	58'-3"	57'-9"	57'-3"	56'-9"	56'-3"	55'-9"
70	59'-7"	59'-0"	58'-6"	58'-0"	57'-6"	57'-0"	56'-6"
72.5	60'-3"	59'-8"	59'-2"	58'-7"	58'-1"	57'-7"	57'-1"
75	60'-11"	60'-4"	59'-9"	59'-2"	58'-8"	58'-1"	57'-7"
77.5	61'-7"	61'-0"	60'-5"	59'-10"	59'-3"	58'-8"	58'-2"
80	62'-2"	61'-7"	61'-0"	60'-5"	59'-10"	59'-3"	58'-8"
82.5	62'-8"	62'-0"	61'-5"	60'-10"	60'-3"	59'-8"	59'-1"
85	63'-2"	62'-8"	61'-11"	61'-3"	60'-8"	60'-1"	59'-6"
87.5	63'-7"	62'-11"	62'-3"	61'-7"	61'-0"	60'-4"	59'-9"
90	64'-0"	63'-4"	62'-8"	62'-0"	61'-4"	60'-8"	60'-0"

* NOTE: All values on this table are for required parking stalls. To determine parking bay widths for non-required stalls, merely use a column showing a stall width dimension that is 4 inches more. The values above the darkened lines are governed by minimum aisle width. The stall widths (8'-6", 8'-10", and 9'-2") are not shown in the ordinance, but are available for use.

TABLE 2: STANDARD CARS - PARKING BAY WIDTHS FOR ONE-WAY TRAFFIC AND SINGLE LOADED AISLES, BASED ON CHART NO. 2 IN ORDINANCE NO. 142,306 *

Parking Angle	8'-4" Stalls	8'-6" Stalls	8'-8" Stalls	8'-10" Stalls	9'-0" Stalls	9'-2" Stalls	9'-4" Stalls
30	27'-6"	27'-6"	27'-6"	27'-6"	27'-6"	27'-6"	27'-6"
32.5	28'-1"	28'-1"	28'-1"	28'-1"	28'-1"	28'-1"	28'-1"
35	28'-7"	28'-7"	28'-7"	28'-7"	28'-7"	28'-7"	28'-7"
37.5	29'-1"	29'-1"	29'-1"	29'-1"	29'-1"	29'-1"	29'-1"
40	29'-11"	29'-6"	29'-6"	29'-6"	29'-6"	29'-6"	29'-6"
42.5	30'-11"	30'-6"	30'-1"	29'-10"	29'-10"	29'-10"	29'-10"
45	31'-11"	31'-6"	30'-8"	30'-8"	30'-3"	30'-3"	30'-5"
47.5	32'-11"	32'-6"	32'-1"	31'-8"	31'-3"	31'-10"	30'-5"
50	33'-10"	33'-5"	33'-0"	32'-7"	32'-2"	31'-9"	31'-4"
52.5	34'-9"	34'-3"	33'-9"	33'-4"	32'-11"	32'-6"	32'-1"
55	35'-7"	35'-1"	34'-7"	34'-2"	33'-8"	33'-3"	32'-10"
57.5	36'-5"	35'-11"	35'-5"	35'-0"	34'-6"	34'-0"	33'-7"
60	37'-3"	36'-9"	36'-3"	35'-9"	35'-3"	34'-9"	34'-4"
62.5	38'-0"	37'-6"	37'-0"	36'-6"	36'-0"	35'-6"	35'-0"
65	38'-9"	38'-2"	37'-8"	37'-2"	36'-8"	36'-2"	35'-8"
67.5	39'-6"	38'-11"	38'-5"	37'-11"	37'-4"	36'-10"	36'-4"
70	40'-3"	39'-8"	39'-2"	38'-7"	38'-1"	37'-6"	37'-0"
72.5	40'-11"	40'-4"	39'-10"	39'-3"	38'-9"	38'-2"	37'-8"
75	41'-8"	41'-1"	40'-7"	40'-0"	39'-5"	38'-10"	38'-4"
77.5	42'-5"	41'-10"	41'-3"	40'-8"	40'-1"	39'-6"	39'-0"
80	43'-1"	42'-6"	41'-11"	41'-4"	40'-9"	40'-2"	39'-7"
82.5	43'-9"	43'-1"	42'-6"	41'-11"	41'-4"	40'-9"	40'-2"
85	44'-6"	43'-10"	43'-3"	42'-7"	42'-0"	41'-4"	40'-9"
87.5	45'-3"	44'-7"	43'-11"	43'-4"	42'-8"	42'-0"	41'-5"
90	46'-0"	45'-4"	44'-8"	44'-0"	43'-4"	42'-8"	42'-0"

* NOTE: All values on this table are for required parking stalls. To determine parking bay widths for non-required stalls, merely use a column showing a stall width dimension that is 4 inches more. The values above the darkened lines are governed by minimum aisle width. The stall widths (8'-6", 8'-10", and 9'-2") are not shown in the ordinance, but are available for use.

TABLE 3: STANDARD CARS - PARKING BAY WIDTHS FOR TWO-WAY TRAFFIC AND DOUBLE LOADED AISLES, BASED ON CHART NO. 3 IN ORDINANCE NO. 142,306 *

Parking Angle	8'-4" Stalls	8'-6" Stalls	8'-8" Stalls	8'-10" Stalls	9'-0" Stalls	9'-2" Stalls	9'-4" Stalls
30	51'-2"	51'-2"	51'-2"	51'-2"	51'-2"	51'-2"	51'-2"
32.5	52'-4"	52'-4"	52'-4"	52'-4"	52'-4"	52'-4"	52'-4"
35	53'-3"	53'-3"	53'-3"	53'-3"	53'-3"	53'-3"	53'-3"
37.5	54'-2"	54'-2"	54'-2"	54'-2"	54'-2"	54'-2"	54'-2"
40	54'-10"	54'-10"	54'-10"	54'-10"	54'-10"	54'-10"	54'-10"
42.5	55'-7"	55'-7"	55'-7"	55'-7"	55'-7"	55'-7"	55'-7"
45	56'-4"	56'-4"	56'-4"	56'-4"	56'-4"	56'-4"	56'-4"
47.5	57'-0"	57'-0"	57'-0"	57'-0"	57'-0"	57'-0"	57'-0"
50	57'-8"	57'-8"	57'-7"	57'-7"	57'-0"	57'-6"	57'-6"
52.5	58'-4"	58'-3"	58'-2"	58'-2"	58'-1"	58'-0"	58'-0"
55	58'-11"	58'-9"	58'-8"	58'-7"	58'-6"	58'-5"	58'-4"
57.5	59'-6"	59'-4"	59'-2"	59'-1"	58'-11"	58'-9"	58'-8"
60	59'-11"	59'-9"	59'-7"	59'-5"	59'-3"	59'-1"	58'-11"
62.5	60'-5"	60'-2"	60'-0"	59'-9"	59'-7"	59'-4"	59'-2"
65	60'-11"	60'-8"	60'-5"	60'-2"	59'-11"	59'-8"	58'-5"
67.5	61'-5"	61'-1"	60'-9"	60'-6"	60'-2"	59'-10"	59'-7"
70	61'-10"	61'-5"	61'-1"	60'-9"	60'-5"	60'-1"	59'-9"
72.5	62'-3"	61'-10"	61'-5"	61'-0"	60'-7"	60'-2"	59'-10"
75	62'-7"	62'-1"	61'-8"	61'-3"	60'-9"	60'-4"	59'-11"
77.5	62'-11"	62'-5"	61'-11"	61'-5"	60'-11"	60'-5"	60'-0"
80	63'-3"	62'-8"	62'-2"	61'-7"	61'-1"	60'-6"	60'-0"
82.5	63'-6"	62'-11"	62'-4"	61'-9"	61'-2"	60'-7"	60'-0"
85	63'-9"	63'-1"	62'-6"	61'-10"	61'-3"	60'-7"	60'-0"
87.5	63'-11"	63'-3"	62'-7"	61'-11"	61'-3"	60'-7"	60'-0"
90	64'-0"	63'-4"	62'-8"	62'-0"	61'-4"	60'-8"	60'-0"

* NOTE: All values on this table are for required parking stalls. To determine parking bay widths for non-required stalls, merely use a column showing a stall width dimension that is 4 inches more. The values above the darkened lines are governed by minimum aisle width. The stall widths (8'-6", 8'-10", and 9'-2") are not shown in the ordinance, but are available for use.

TABLE 4: STANDARD CARS - PARKING BAY WIDTHS FOR TWO-WAY TRAFFIC AND SINGLE LOADED AISLES, BASED ON CHART NO. 4 IN ORDINANCE NO. 142,306 *

Parking Angle	8'-4" Stalls	8'-6" Stalls	8'-8" Stalls	8'-10" Stalls	9'-0" Stalls	9'-2" Stalls	9'-4" Stalls
30	35'-6"	35'-6"	35'-6"	35'-6"	35'-6"	35'-6"	35'-6"
32.5	36'-0"	36'-0"	36'-0"	36'-0"	36'-0"	36'-0"	36'-0"
35	36'-6"	36'-6"	36'-6"	36'-6"	36'-6"	36'-6"	36'-6"
37.5	37'-0"	37'-0"	37'-0"	37'-0"	37'-0"	37'-0"	37'-0"
40	37'-6"	37'-6"	37'-6"	37'-5"	37'-5"	37'-5"	37'-5"
42.5	38'-0"	38'-0"	37'-11"	37'-11"	37'-11"	37'-10"	37'-10"
45	38'-6"	38'-6"	38'-5"	38'-5"	38'-4"	38'-4"	38'-3"
47.5	39'-0"	38'-11"	38'-10"	38'-10"	38'-9"	38'-8"	38'-8"
50	39'-5"	39'-4"	39'-3"	39'-3"	39'-2"	39'-1"	39'-0"
52.5	39'-10"	39'-9"	39'-8"	39'-7"	39'-6"	39'-5"	39'-4"
55	40'-3"	40'-1"	40'-0"	39'-11"	39'-10"	39'-9"	39'-8"
57.5	40'-8"	40'-6"	40'-5"	40'-4"	40'-2"	40'-1"	40'-0"
60	41'-1"	40'-11"	40'-10"	40'-8"	40'-7"	40'-5"	40'-4"
62.5	41'-6"	41'-4"	41'-2"	41'-0"	40'-10"	40'-8"	40'-7"
65	41'-11"	41'-8"	41'-6"	41'-4"	41'-2"	41'-0"	40'-10"
67.5	42'-4"	42'-1"	41'-11"	41'-8"	41'-6"	41'-3"	41'-1"
70	42'-9"	42'-6"	42'-3"	42'-0"	41'-9"	41'-6"	41'-4"
72.5	43'-2"	42'-10"	42'-7"	42'-4"	42'-0"	41'-9"	41'-6"
75	43'-7"	43'-3"	42'-11"	42'-7"	42'-3"	41'-11"	41'-8"
77.5	44'-0"	43'-7"	43'-3"	42'-11"	42'-6"	42'-2"	41'-10"
80	44'-5"	44'-0"	43'-7"	43'-2"	42'-9"	42'-4"	41'-11"
82.5	44'-10"	44'-4"	43'-10"	43'-5"	42'-11"	42'-5"	42'-0"
85	45'-3"	44'-8"	44'-2"	43'-7"	43'-1"	42'-6"	42'-0"
87.5	45'-8"	45'-0"	44'-5"	43'-10"	43'-2"	42'-7"	42'-0"
90	46'-0"	45'-4"	44'-8"	44'-0"	43'-4"	42'-8"	42'-0"

* NOTE: All values on this table are for required parking stalls. To determine parking bay widths for non-required stalls, merely use a column showing a stall width dimension that is 4 inches more. The values above the darkened lines are governed by minimum aisle width. The stall widths (8'-6", 8'-10", and 9'-2") are not shown in the ordinance, but are available for use.

TABLE 5A: PARKING BAY DIMENSIONS FOR COMPACT CARS - REQUIRED STALLS

REQUIRED STALLS					
ONE WAY TRAFFIC			TWO WAY TRAFFIC		
ANGLE α	DOUBLE LOADED BAY WIDTH	SINGLE LOADED BAY WIDTH	ANGLE α	DOUBLE LOADED BAY WIDTH	SINGLE LOADED BAY WIDTH
30	40'-0"	26'-0"	30	48'-2"	34'-0"
32.5	40'-11"	26'-6"	32.5	49'-1"	34'-5"
35	41'-10"	26'-10"	35	49'-10"	34'-9"
37.5	42'-7"	27'-3"	37.5	50'-6"	35'-2"
40	43'-2"	27'-7"	40	50'-11"	35'-6"
42.5	43'-7"	27'-10"	42.5	51'-6"	35'-10"
45	44'-4"	28'-2"	45	52'-1"	36'-3"
47.5	45'-5"	29'-0"	47.5	52'-7"	36'-6"
50	46'-5"	29'-10"	50	52'-11"	36'-10"
52.5	47'-3"	30'-6"	52.5	53'-4"	37'-2"
55	48'-10"	31'-3"	55	53'-7"	37'-4"
57.5	48'-7"	31'-11"	57.5	53'-10"	37'-8"
60	49'-4"	32'-8"	60	54'-1"	37'-11"
62.5	50'-0"	33'-4"	62.5	54'-3"	38'-2"
65	50'-9"	33'-11"	65	54'-6"	38'-5"
67.5	51'-3"	34'-7"	67.5	54'-8"	38'-9"
70	51'-10"	35'-3"	70	54'-9"	38'-11"
72.5	52'-4"	35'-10"	72.5	54'-10"	39'-2"
75	52'-10"	36'-6"	75	54'-11"	39'-4"
77.5	53'-4"	37'-3"	77.5	55'-1"	39'-7"
80	53'-11"	37'-10"	80	55'-2"	39'-10"
82.5	54'-4"	38'-4"	82.5	55'-3"	39'-11"
85	54'-8"	39'-0"	85	55'-3"	40'-1"
87.5	55'-0"	39'-8"	87.5	55'-3"	40'-2"
90	55'-4"	40'-4"	90	55'-4"	40'-4"

TABLE 5B: PARKING BAY DIMENSIONS FOR COMPACT CARS - NON-REQUIRED STALLS

NON-REQUIRED STALLS					
ONE WAY TRAFFIC			TWO WAY TRAFFIC		
ANGLE α	DOUBLE LOADED BAY WIDTH	SINGLE LOADED BAY WIDTH	ANGLE α	DOUBLE LOADED BAY WIDTH	SINGLE LOADED BAY WIDTH
30	40'-0"	26'-0"	30	48'-2"	34'-0"
32.5	40'-11"	26'-6"	32.5	49'-1"	34'-5"
35	41'-10"	26'-10"	35	49'-10"	34'-9"
37.5	42'-7"	27'-3"	37.5	50'-6"	35'-2"
40	43'-2"	27'-7"	40	51'-0"	35'-6"
42.5	43'-7"	27'-10"	42.5	51'-6"	35'-10"
45	44'-2"	28'-1"	45	52'-1"	36'-2"
47.5	44'-7"	28'-3"	47.5	52'-7"	36'-5"
50	45'-6"	29'-0"	50	52'-11"	36'-8"
52.5	46'-3"	29'-10"	52.5	53'-2"	37'-0"
55	47'-0"	30'-5"	55	53'-5"	37'-3"
57.5	47'-8"	31'-1"	57.5	53'-7"	37'-6"
60	48'-5"	31'-9"	60	53'-9"	37'-8"
62.5	49'-1"	32'-4"	62.5	53'-10"	37'-11"
65	49'-9"	32'-11"	65	54'-0"	38'-1"
67.5	50'-3"	33'-7"	67.5	54'-0"	38'-4"
70	50'-10"	34'-2"	70	54'-0"	38'-6"
72.5	51'-4"	34'-10"	72.5	54'-0"	38'-8"
75	51'-10"	35'-5"	75	54'-0"	38'-9"
77.5	52'-4"	36'-1"	77.5	54'-0"	38'-11"
80	52'-9"	36'-8"	80	54'-0"	39'-0"
82.5	53'-2"	37'-2"	82.5	54'-0"	39'-0"
85	53'-6"	37'-9"	85	54'-0"	39'-0"
87.5	53'-9"	38'-5"	87.5	54'-0"	39'-2"
90	54'-0"	39'-0"	90	54'-0"	39'-2"

TABLE 6: ACCESS AISLE WIDTH FOR 90 DEGREE COMPACT AND STANDARD STALLS

STANDARD STALLS- RESIDENTIAL		STANDARD STALLS-ALL OTHERS		COMPACT STALLS	
STALL WIDTH	AISLE WIDTH	STALL WIDTH	AISLE WIDTH	STALL WIDTH	AISLE WIDTH
8'-6"	27'-4"	8'-4"	28'-0"	7'-6"	25'-4"
8'-8"	26'-8"	8'-8"	26'-8"	7'-10"	24'-0"
9'-0"	25'-4"	9'-0"	25'-4"	8'-2"	22'-8"
9'-4"	24'-0"	9'-4"	24'-0"	8'-4"	22'-0"
9'-6"	23'-4"	9'-6"	23'-4"	8'-6"	21'-4"
9'-8"	22'-8"	9'-8"	22'-8"	8'-8"	20'-8"
9'-10"	22'-0"	9'-10"	22'-0"	8'-10"	20'-0"

L. CALCULATION OF PARKING SPACES

To determine the number of parking spaces possible on a given sized lot or to determine the lot size required for a certain number of spaces, refer to Figure 3 and the following procedures:

1. To find the required Length (L) for a certain Number (N) of parking stalls:
 - a. Select Bay Width (B) from lot area that is available.
 - b. Using the parking bay charts or tables choose a trial Parking Angle, α (use maximum) and Stall Width, W (W is 8'-4" minimum for commercial required and non-required parking, 8'-6" minimum for residential required and non-required parking.)

NOTE: See Table 1 thru 4 for standard car stall and Tables 5A, 5B, and 6 for compact car stall bay width dimensions.

- c. From Figure 3 calculate the following values:

$$X = S \cos \alpha \quad Y = W / \sin \alpha \quad Z = W \sin \alpha$$

Then the Length (L) is the sum of the X, Y, and Z dimensions.

$$L = X + Z + (N-1) Y, \text{ which is (one stall) + (all stalls but one) } Y$$

2. To determine the Number (N) of parking stalls possible for an available parking bay of Length (L)

$$\text{Total number of parking spaces, } N = \frac{L - (X + Z)}{Y} + 1$$

3. For multiple parking bays where the bays overlap and interlock, the net bay widths may be determined by the parking bay relationships shown below:
 - a. Parking lot width for overlapping, interlocking bay widths, M (See Figure 3).
 - b. Compute parking bay overlap width, $Q = W \cos \alpha$ then determine required parking area width as follows:
 - i. For 2 interlocking bays, both double loaded: lot width = $2B - Q$, where b = width of single loaded bay
 - ii. For double and single loaded lot width = $B + b + Q$
 - iii. For multiple bays, all double loaded: lot width = $r (B - Q) + Q$, where r = number of bays
 - iv. One single loaded end bay: lot width = $r (B - Q) - b$
both end bays single loaded: lot width = $r (B - Q) + b$
4. Supplementary dimensions:
 - a. For angle α , parking stall depth, $P = S \sin \alpha + Q$
 - b. Driveway aisle width, D
double loaded bays, $D = B - 2P$
single loaded bays, $D = b - P$
5. Double loaded means parking on both sides of the driveway access aisle. Single loaded means parking on one side of the driveway access aisle.

M. STRIPING FOR ALL PARKING STALLS OTHER THAN THOSE SERVING A ONE FAMILY DWELLING

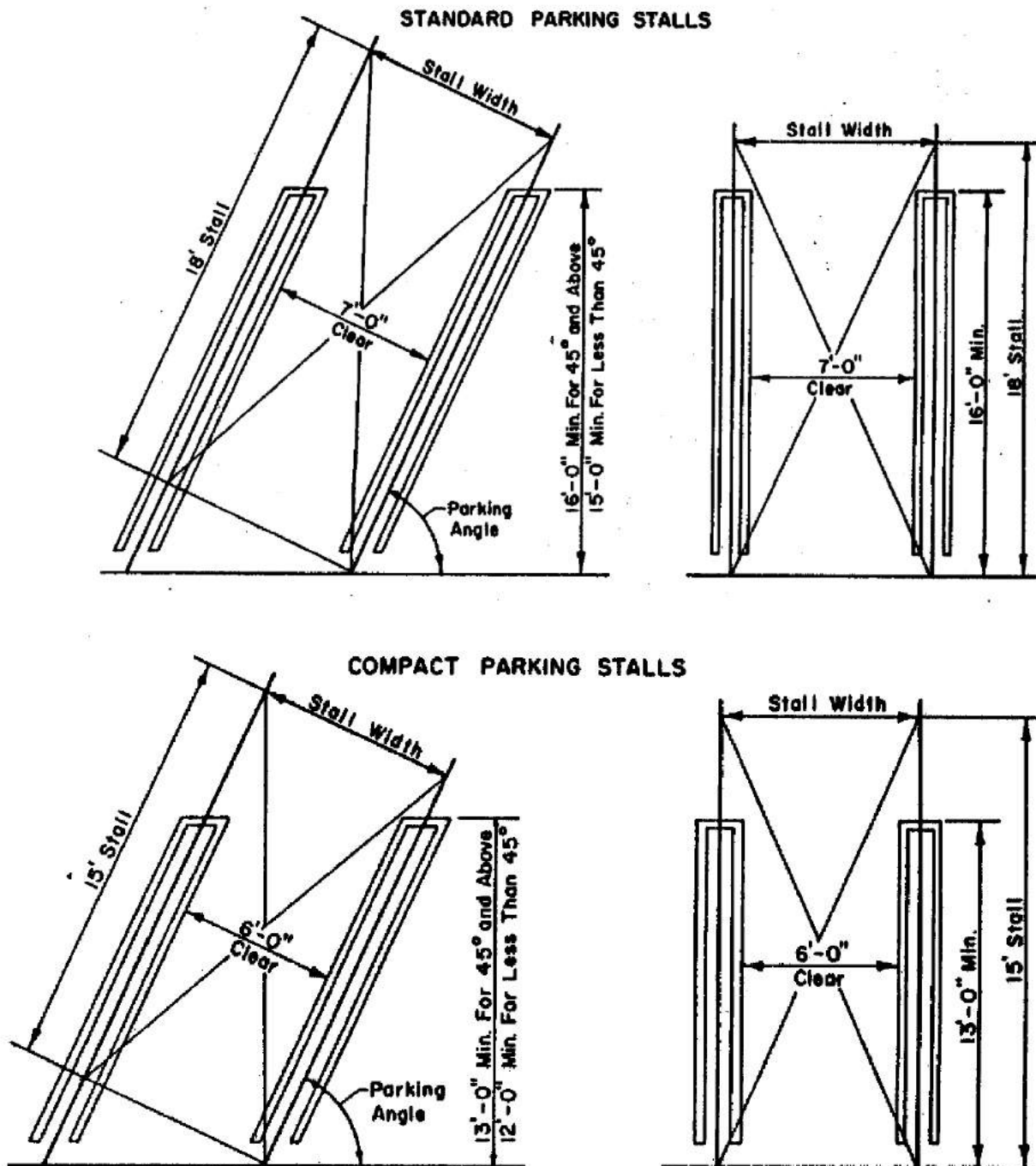
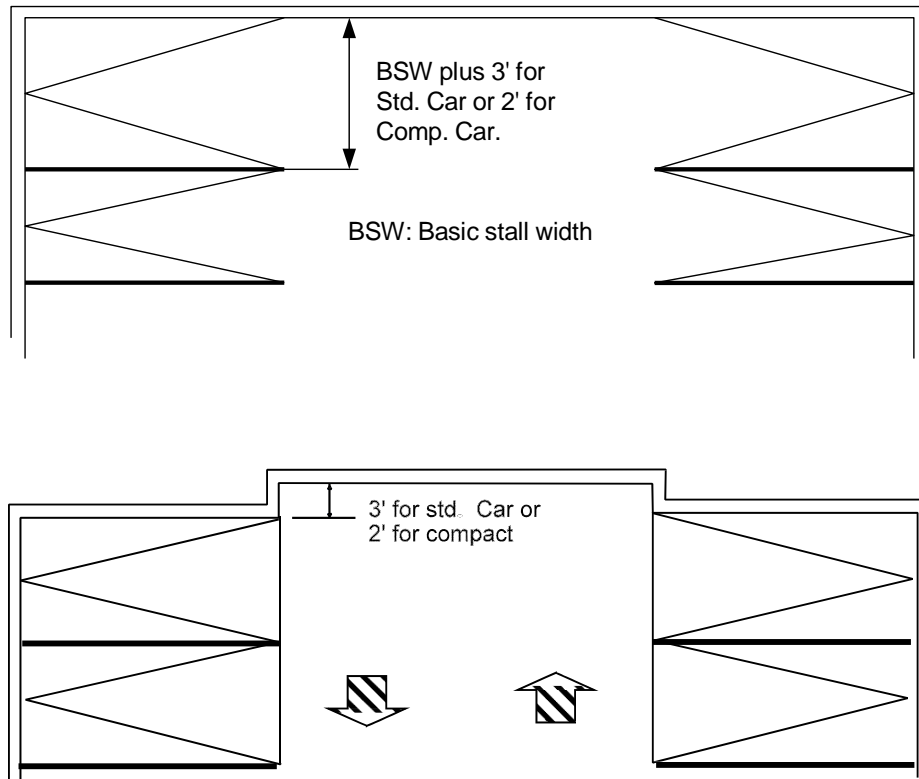


FIGURE 1

N. END STALL CONDITIONS

1. For end parking stalls placed at angles greater than 80 degrees, an increase of 3 ft. for standard stalls and 2 ft. for compact stalls to the Basic Stall Width (BSW) is required.
2. If access aisle extends a minimum of 3 ft. for standard stalls and 2 ft. for compact stalls beyond the end parking stall, no increase in stall width is required other than the 10 inch increase for obstructions. (See Figure 2 below)
3. The increase in stall width for end stall conditions or the extension of the access aisle beyond the end parking stall may be omitted if a minimum of 32 ft. wide access aisle is provided.
4. For standard stall with access aisle widths between 28 ft. and 32 ft., you can decrease the 3 ft. increase in stall width or extension of the access aisle by 6 ½ inches per foot of width of access aisle width beyond 28 ft.
5. For compact stalls, you can decrease the 2 ft. increase in stall width or extension of access aisle by 3 ½ inches per foot of width beyond 28 ft. of access aisle width.

FIGURE 2



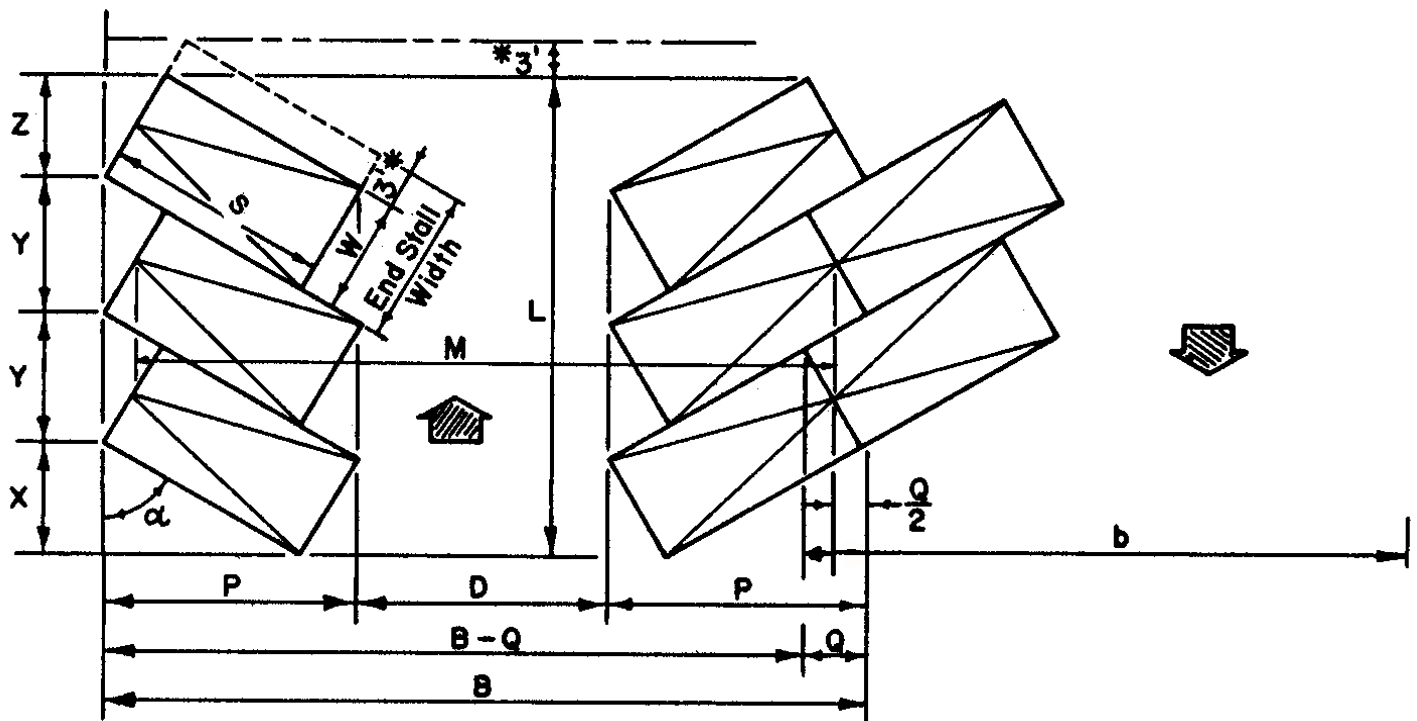


FIGURE 3

* End stalls for 82.5° to 90° parking shall be 3'-0" wider, or the access aisle shall extend 5' minimum beyond bay $(L + 3')$.

O. PARKING WALL HEIGHT

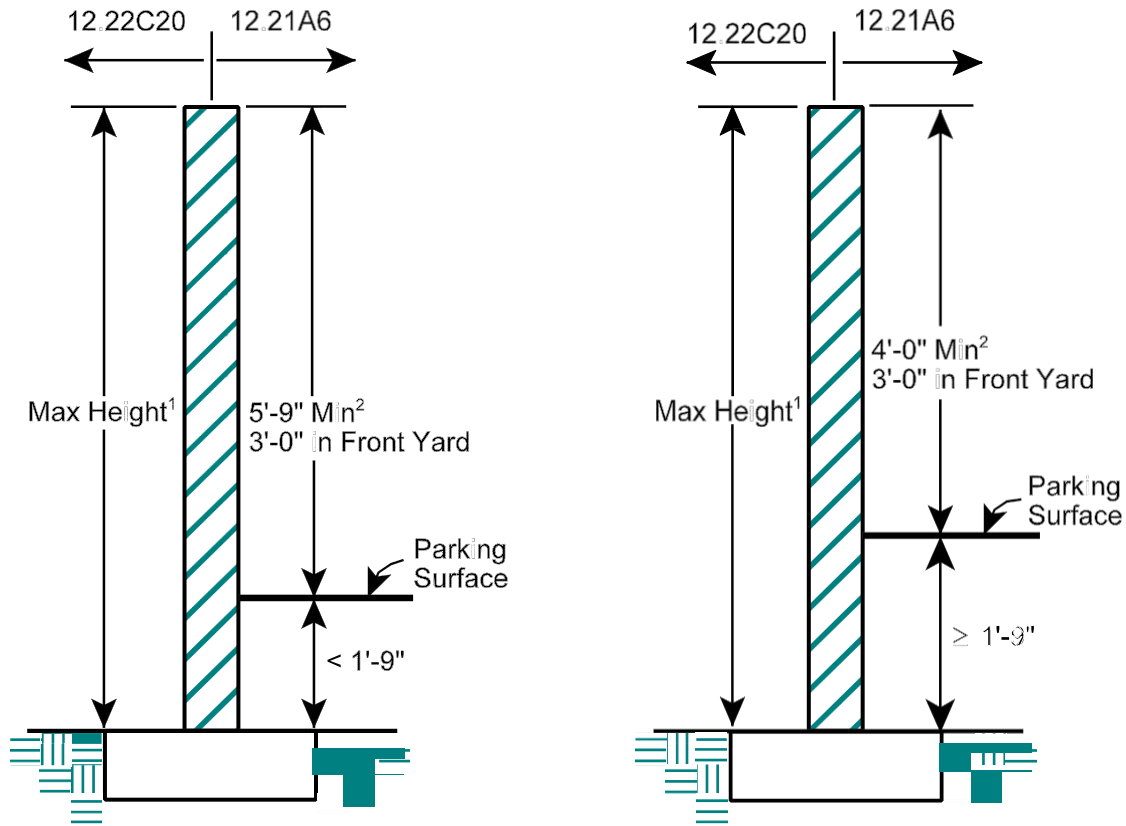


FIGURE 4

¹ Wall cannot exceed the height limitation as specified in 12.22C20(f) for "A" or "R" zones.

² Minimum height for parking wall is measured from the finished grade of the parking surface.

P. DRIVEWAY AND TURNING AREAS

FIGURE 5 - FOR PARALLEL PARKING

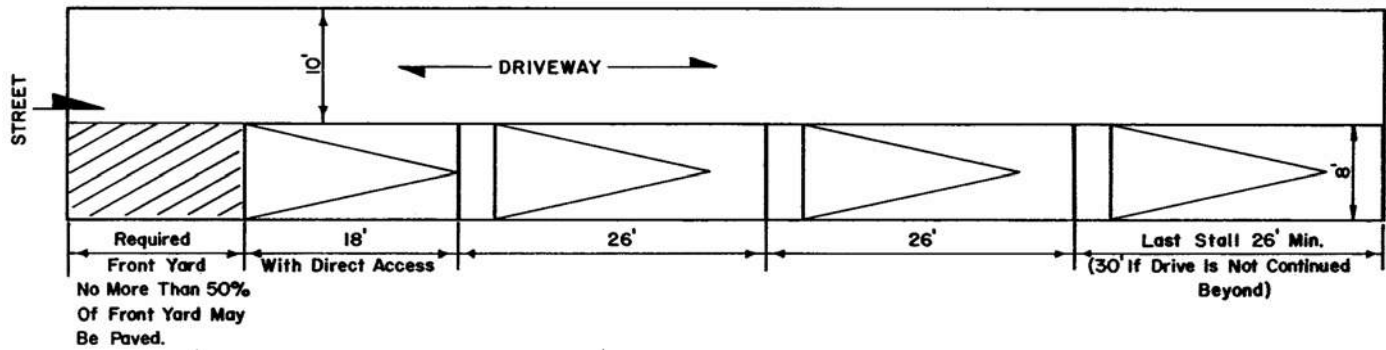


FIGURE 6 - CIRCULATION DRIVEWAYS FOR VARIOUS PARKING ANGLES

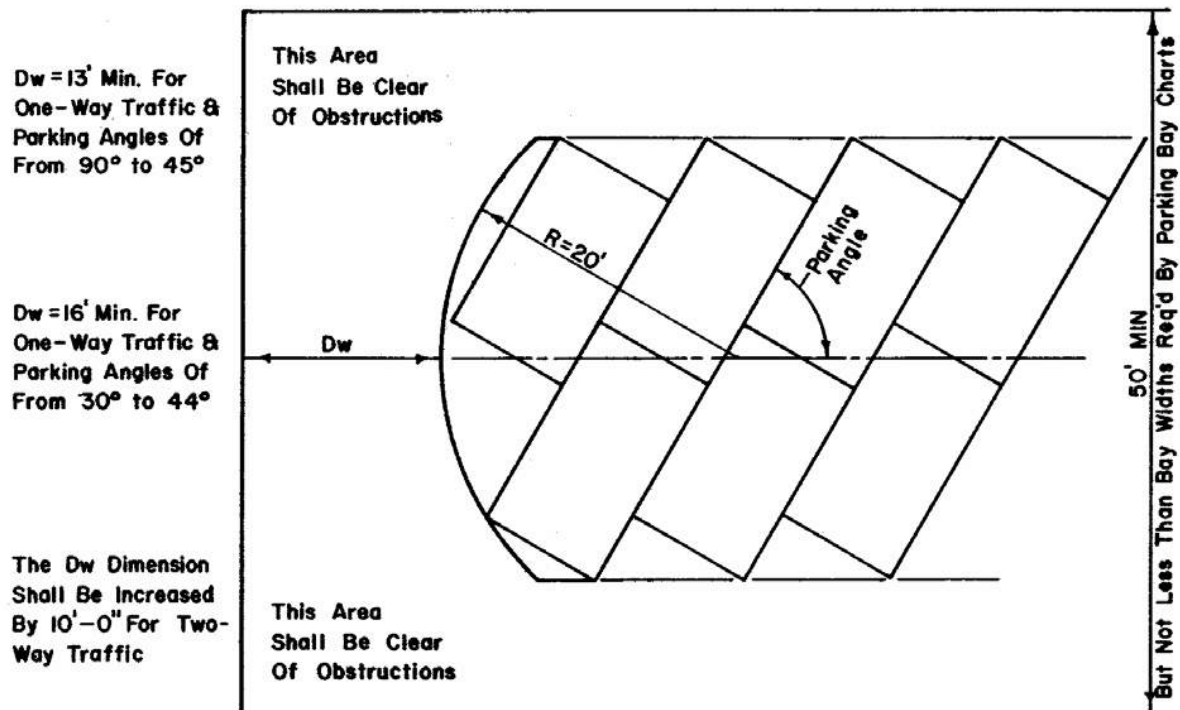
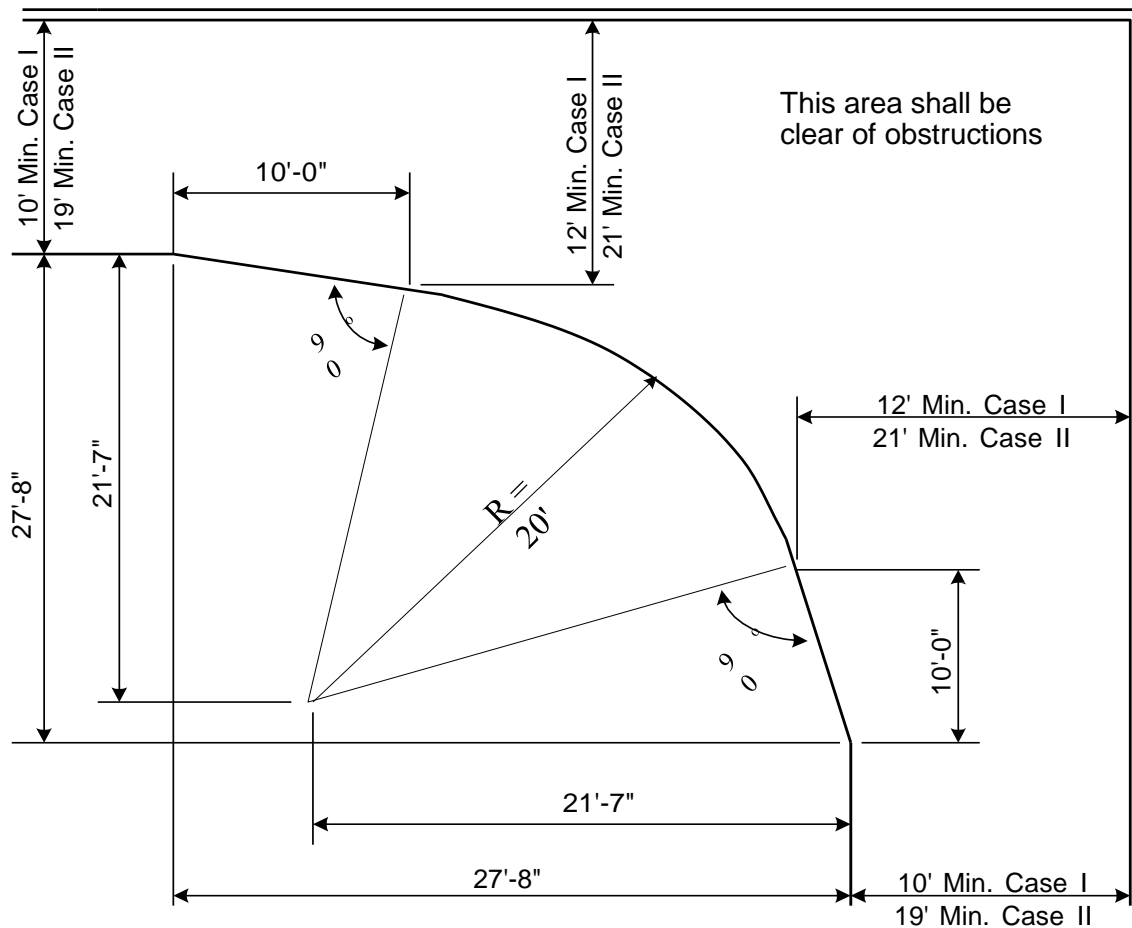


FIGURE 7 - CIRCULATION DRIVEWAYS

90° Turn

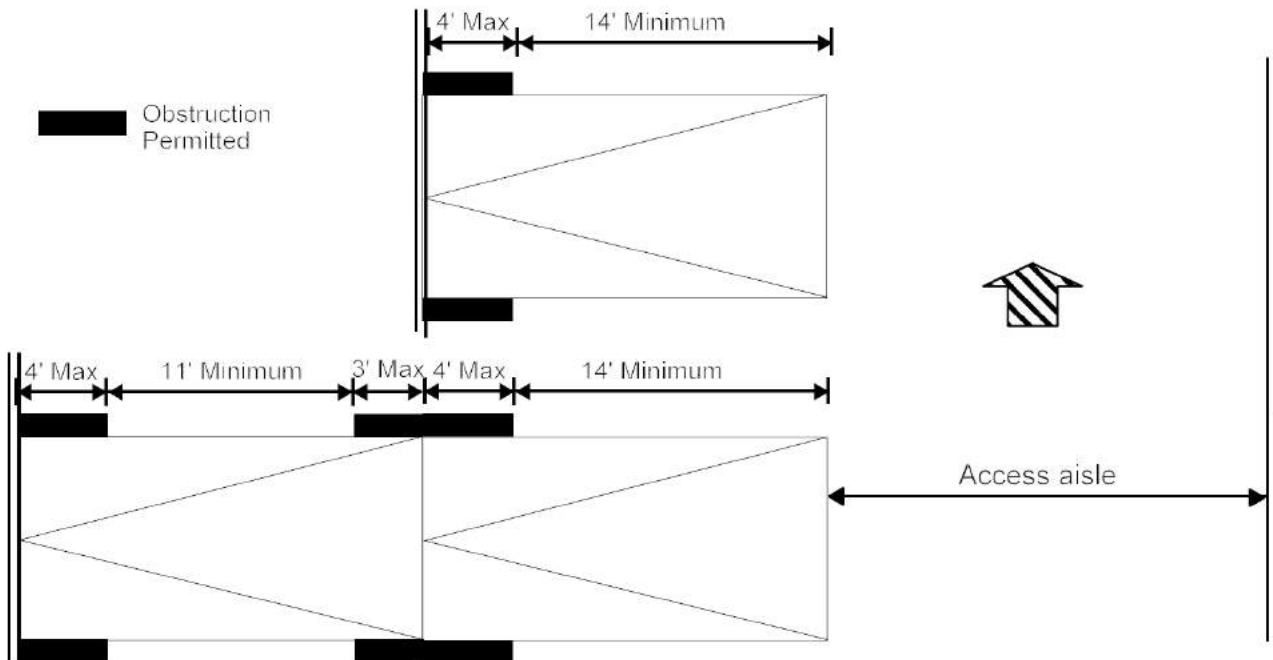
(No Scale)



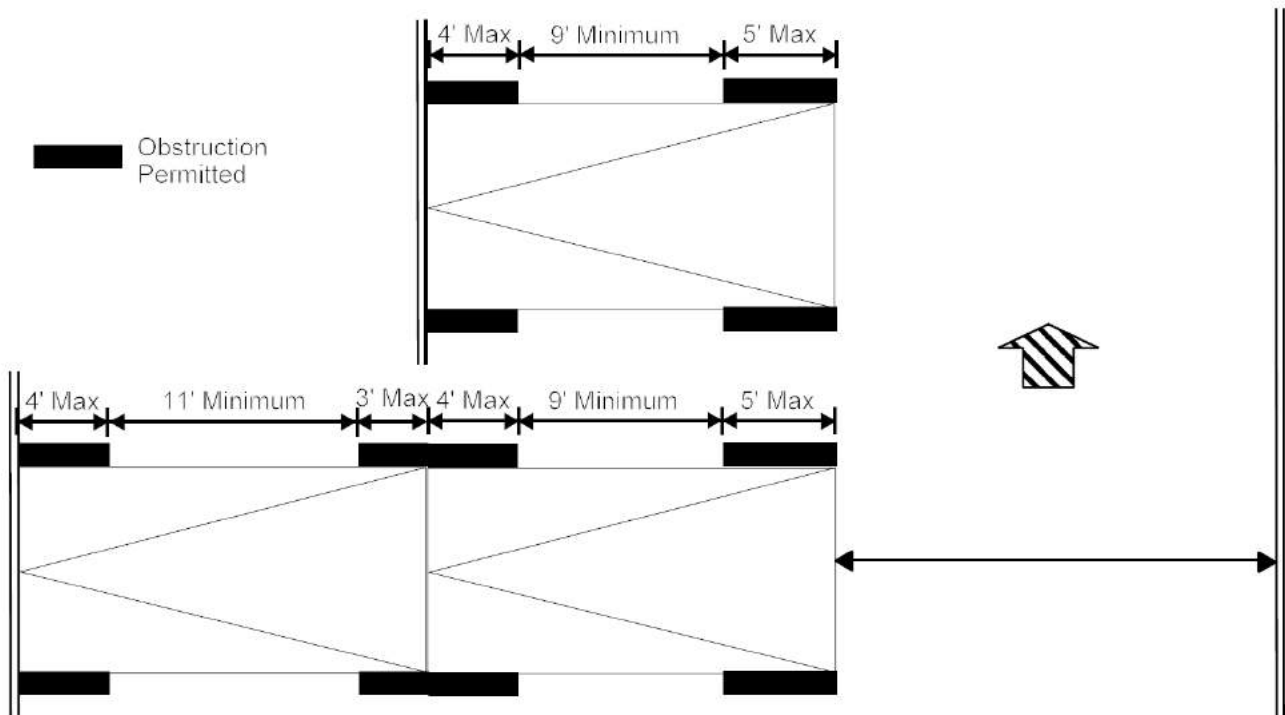
Case I - One-way traffic or two-way traffic where no more than 25 cars go around the turn.

Case II - Two-way traffic and more than 25 cars go around the turn.

FIGURE 8 -MINIMUM ACCESS AISLE PER TABLES 1 THROUGH 6



**FIGURE 9 - MINIMUM ACCESS AISLE OF 28'-0" REQUIRED
APARTMENTS AND CONDOMINIUM UNITS ONLY**



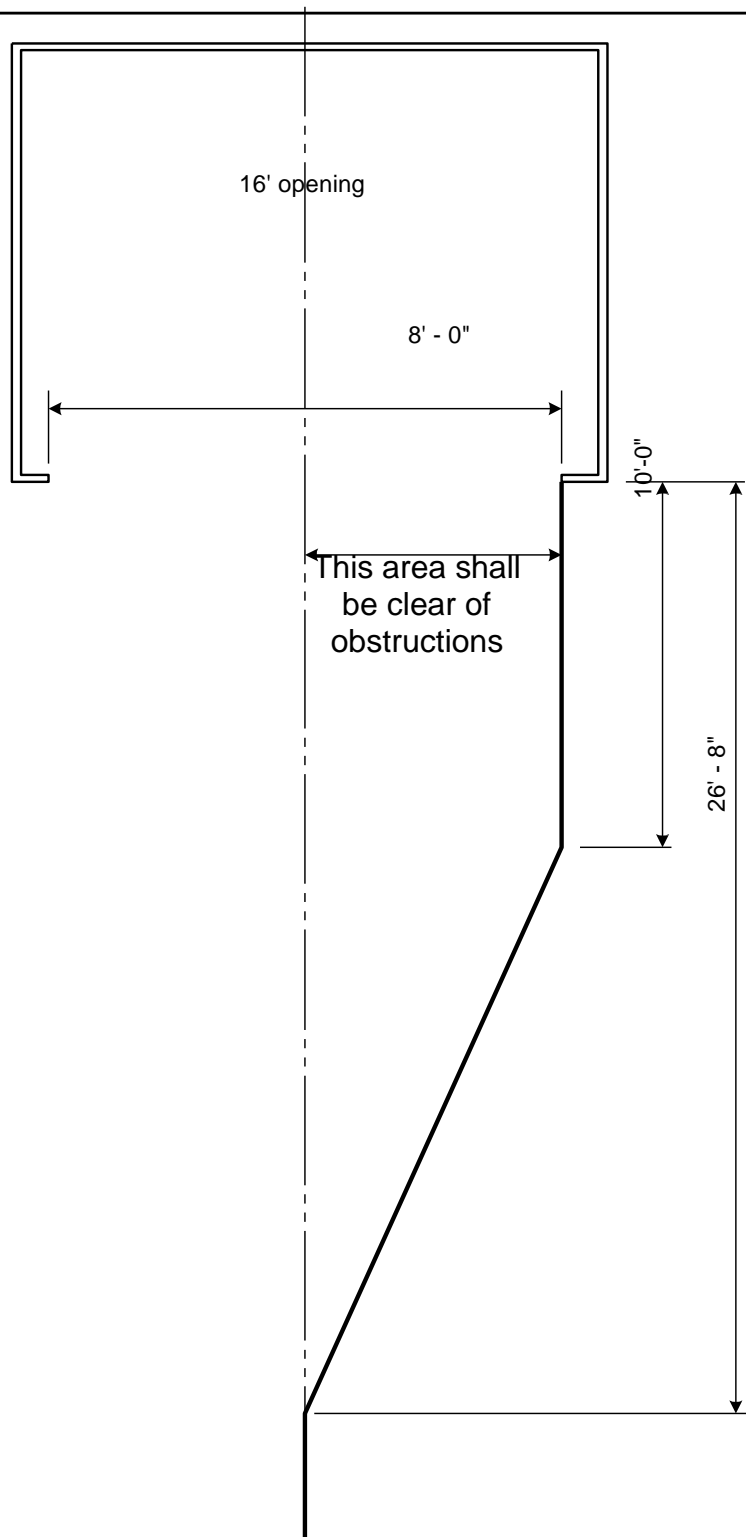
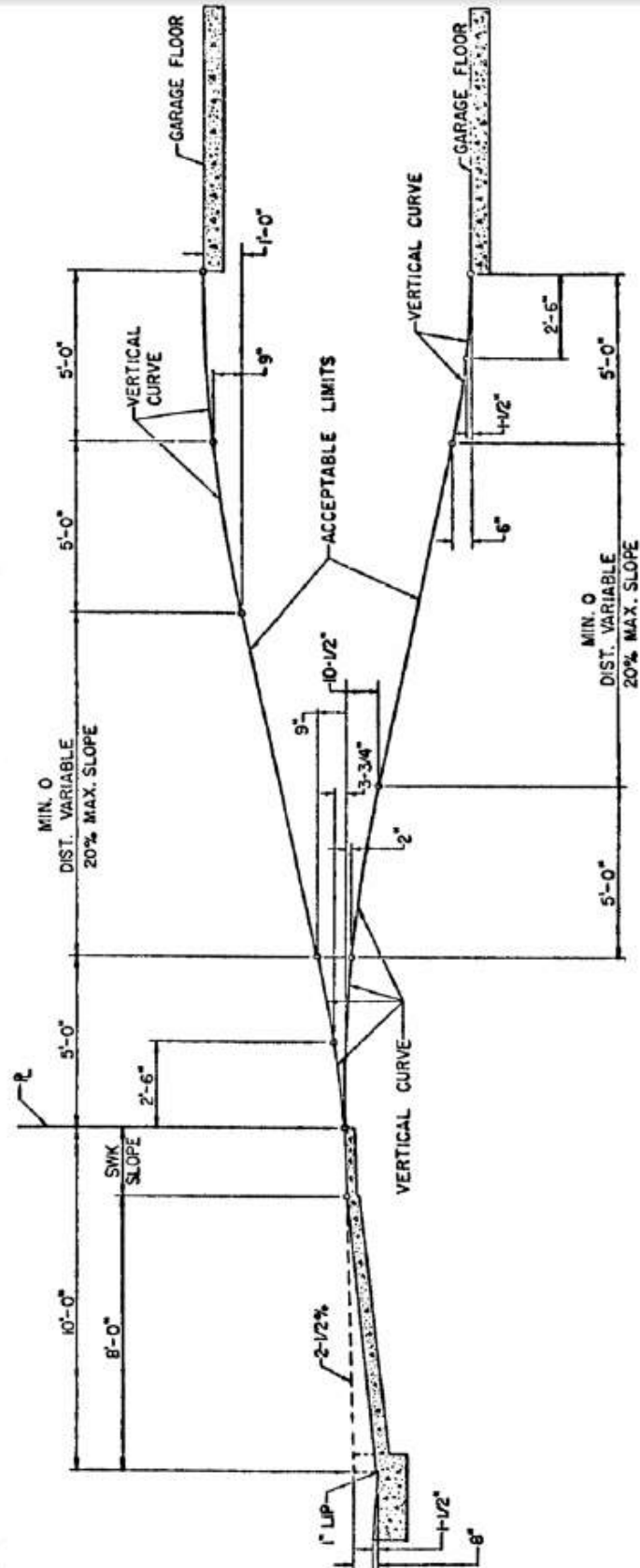
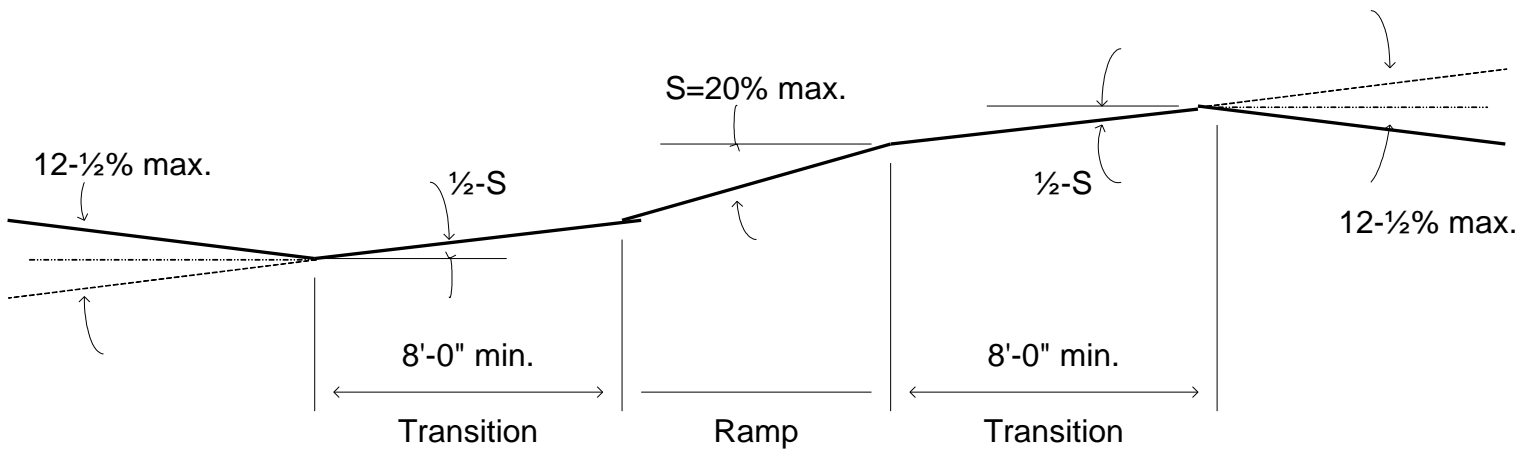


FIGURE 10: RESIDENTIAL GARAGE - TURNING CLEARANCE (FOR SINGLE FAMILY WELLINGS)

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Note:

Where ramp intersects the public way, the transition shall be designed as required by the Department of Public Works.

FIGURE 11B: DRIVEWAY TRANSITIONS (SIMPLIFIED DIAGRAM)

Q. MECHANICAL AUTOMOBILE PARKING LIFTS

Mechanical automobile parking lifts can be used to provide required parking spaces with the following conditions:

1. Types of mechanical automobile parking lifts that are covered by this section are:
 - a. 2- post lifts
 - b. Scissor lifts
 - c. 4-post lifts

Other types of mechanical automobile parking lift system may be considered on case-by-case bases. See **Figure 12** below for graphical representation of the typical lifts.

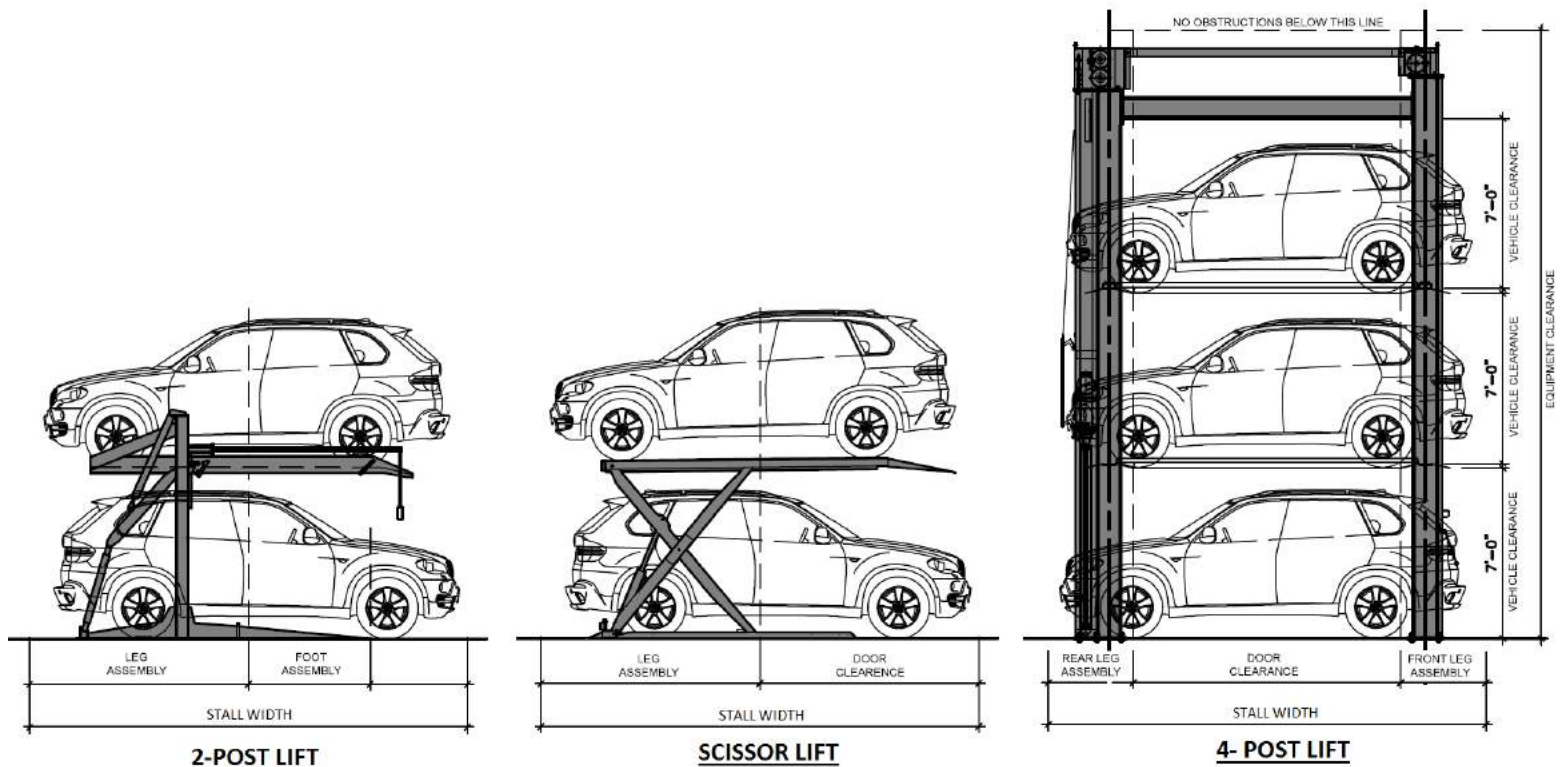


FIGURE 12- TYPES OF MECHANICAL AUTOMOBILE PARKING LIFTS

2. The platform of the mechanical lift on which the automobile is first places shall be individually and easily accessible and shall be placed so that the location of the platform and vehicular access to the platform meets the LAMC Section 12.21A5(a), (b), and (i) requirements.
3. Electrical Testing Laboratory approval is required for a mechanical automobile parking lifts. All of the conditions of approval shall be complied with.

4. Mechanical automobile parking lifts must maintain the following clear width between vertical supports or any obstructions:
 - a. Minimum 8'- 0" clear width for standard stalls
 - b. Minimum 7'- 0" clear width for compact stalls.

See **Figure 13** below for additional information.

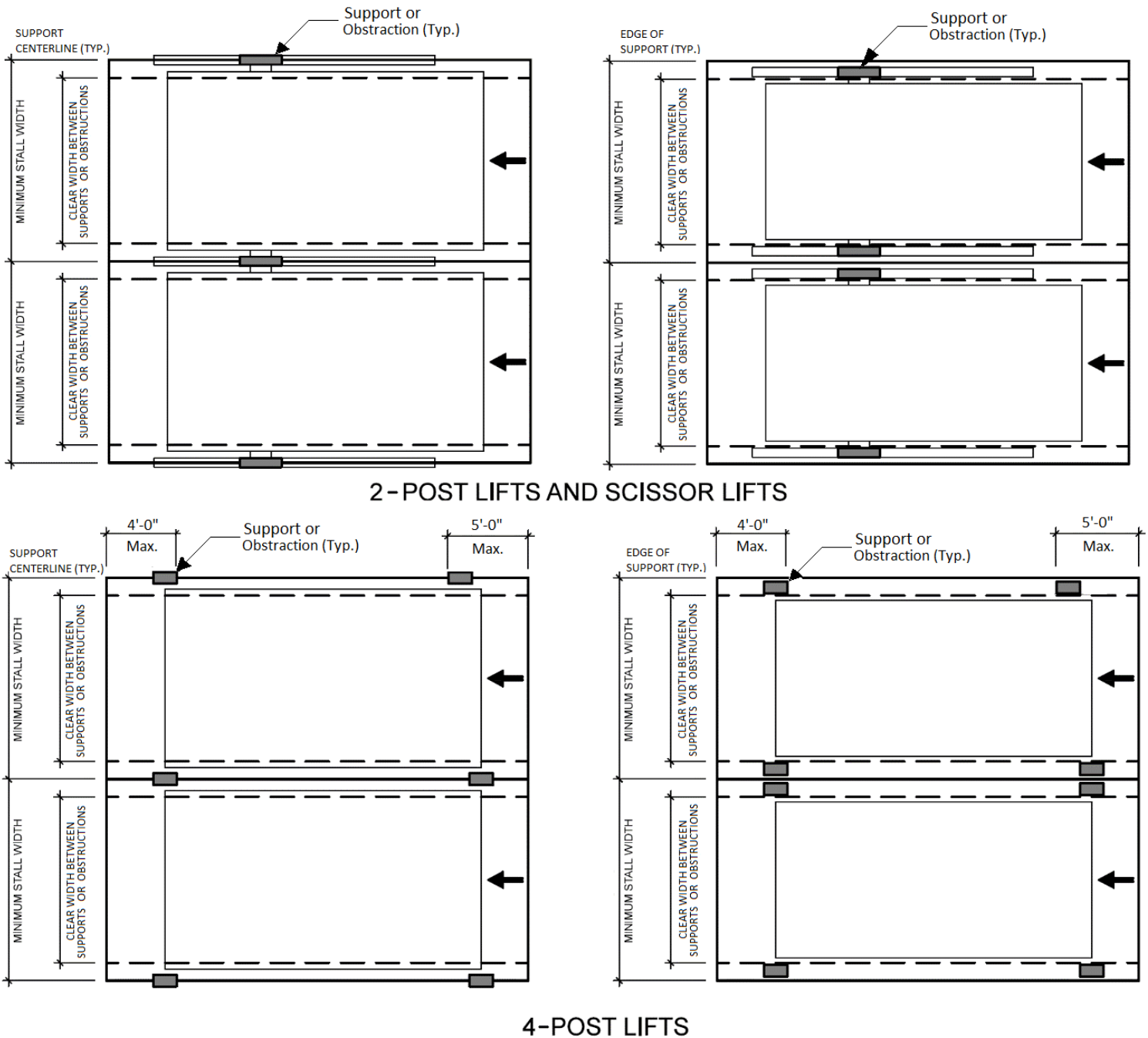
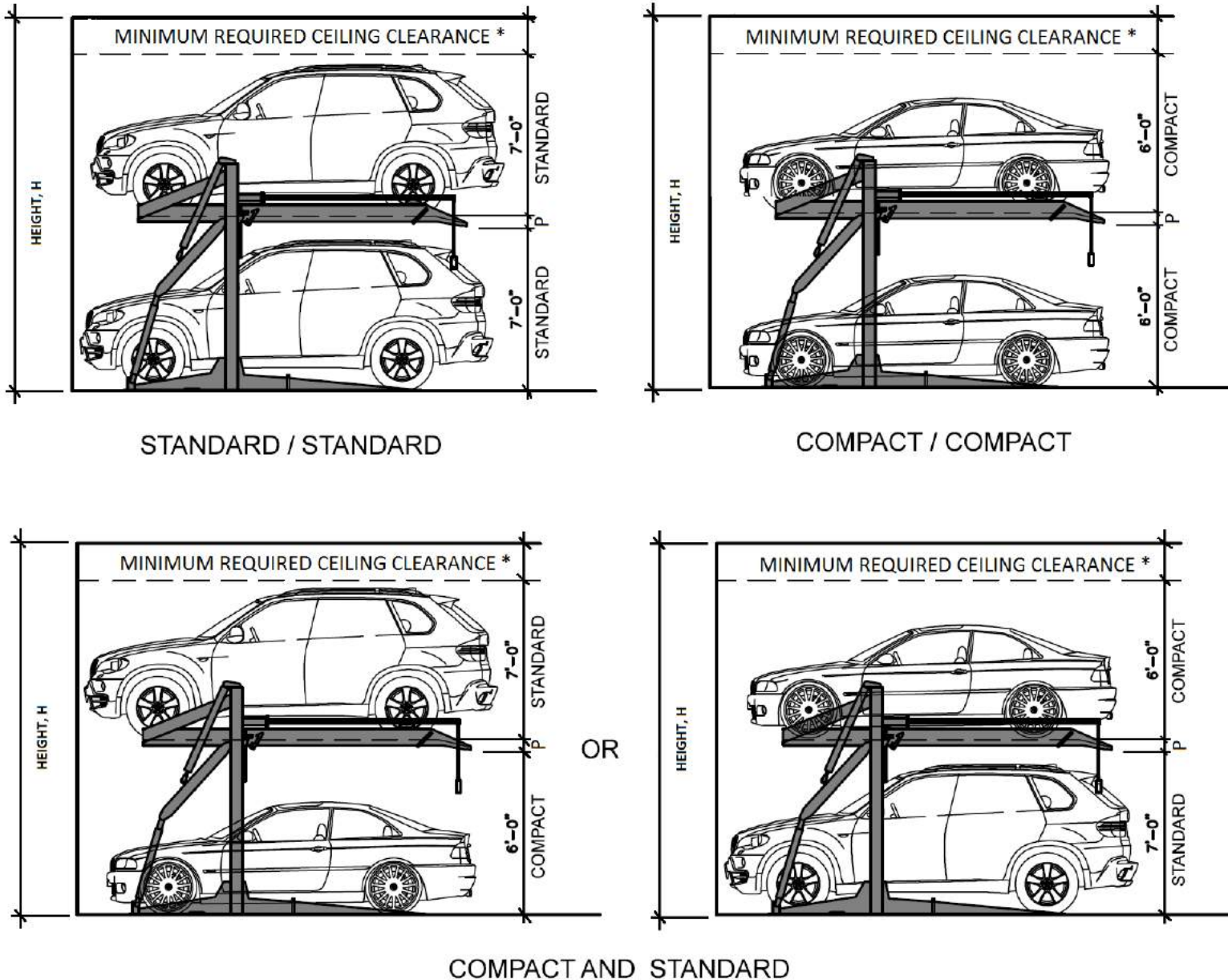


FIGURE 13- MINIMUM CLEAR WIDTH BETWEEN SUPPORTS AND OBSTRUCTIONS

5. The stall heights within the mechanical automobile parking lifts shall be as follows:
 - a. Minimum clear height of 7'-0" for standard stalls
 - b. Minimum clear height of 6'-0" for compact stalls

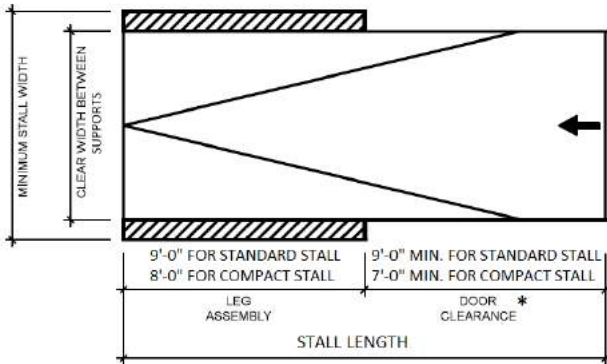
See **Figure 14** below for additional requirements.



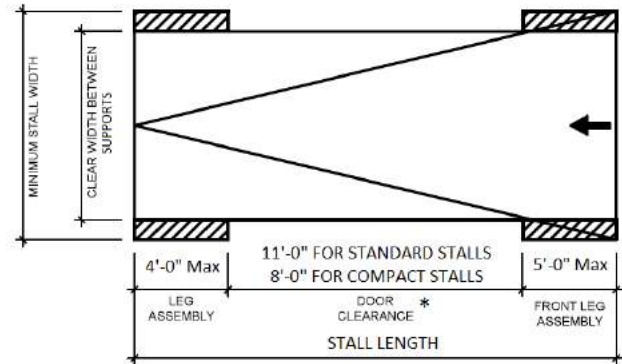
- * Minimum required clearance shall be 18" for sprinklers, or as-needed for roll-up doors.
- P = Platform thickness (See Manufacturer's Specifications)
- H = Height of any combination of the car type in stacked + P + Ceiling Clearance = Minimum clear floor to ceiling height required.

FIGURE 14- MINIMUM CLEAR HEIGHTS

6. Mechanical automobile parking lifts must provide adequate door clearance for an attendant to exit a vehicle per manufactures specifications. See **Figure 12 and Figure 15** for additional information.



2-POST/SCISSOR LIFTS



4-POST LIFTS

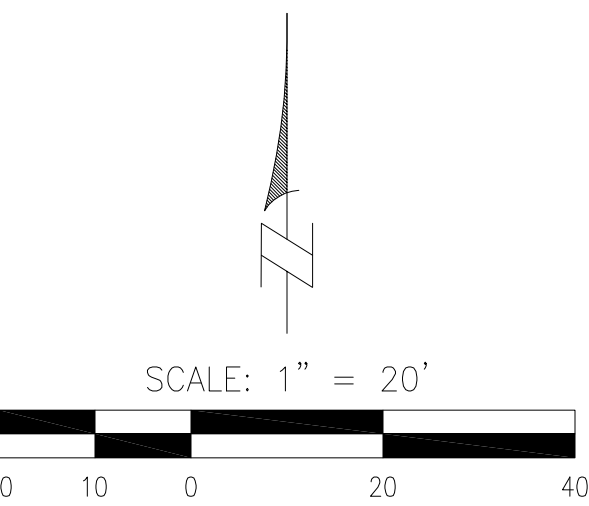
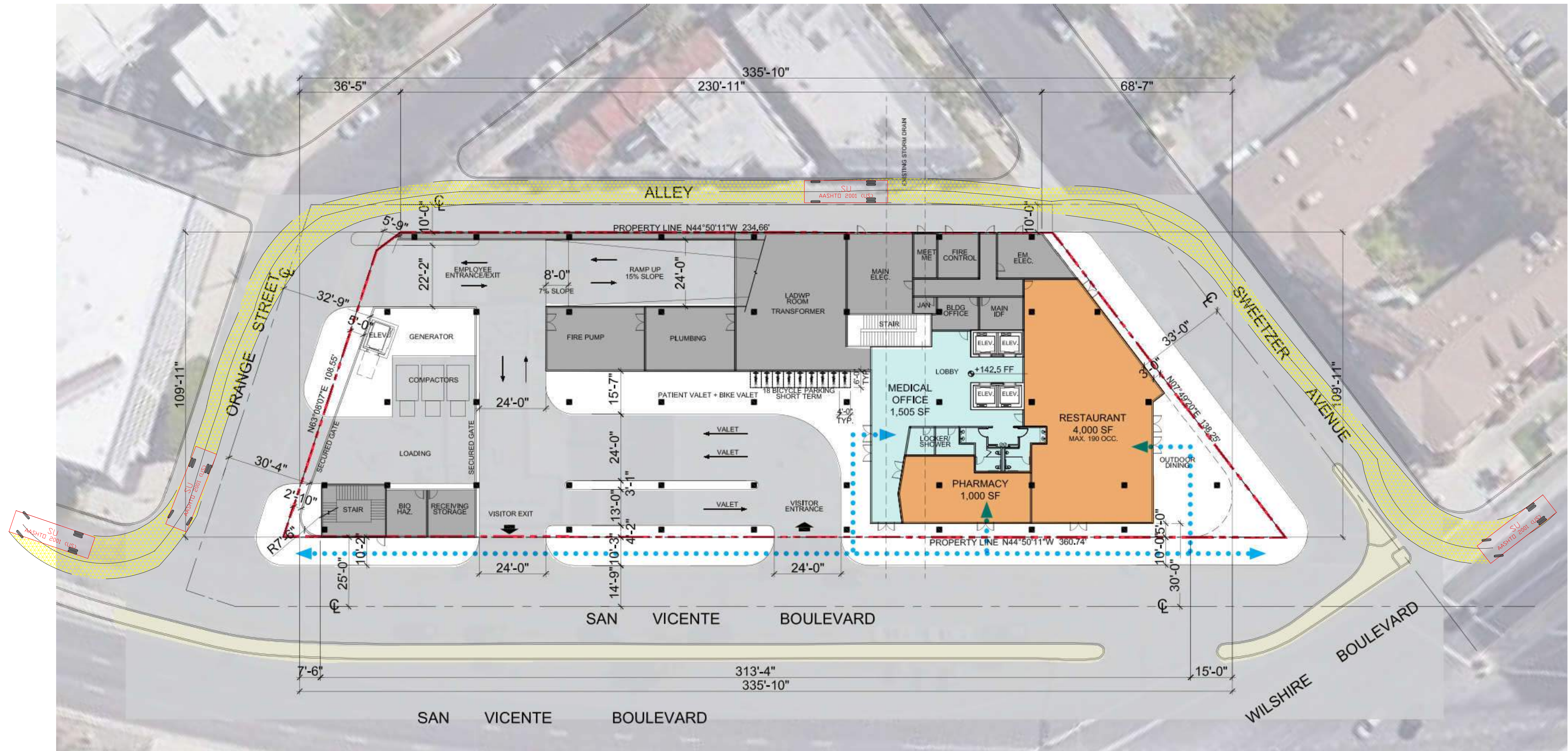
- * Obstructions are not allowed within this area

FIGURE 15- VEHICLE DOOR CLEARANCES

7. Mechanical automobile parking lifts shall be arranged in such a manner as to allow full operation of the sprinkler system. The required ceiling height may be reduced by up to 18 inches if the mechanical automobile parking lift is installed in a non-sprinklered garage, or when approval has been obtained from the Mechanical Plan Check for wall mounted Fire sprinklers **prior to Building Plan Check approval**. Additional headroom may be required to accommodate installation of roll-up garage doors.
8. Mechanical automobile parking lifts are considered tandem parking. Therefore, they shall not be installed where tandem parking is prohibited, such as within a commercial corner lot development, mini-shopping center, for recreational vehicles or guest parking.
9. In a private garage or private parking area, the tandem parking shall not be more than two-cars in depth [LAMC Section 12.21 A.5 (h)(2)]. Therefore, no parking spaces are permitted at the front and/or back of mechanical automobile parking lifts.
10. A "Covenant and Agreement to Provide Parking Attendant" shall be recorded with LA County Recorder's Office for tandem parking in public parking areas.
11. When tandem parking is provided, parking area shall be capable of accommodating required onsite queuing spaces for the shuffling of cars. The queuing spaces shall be arranged so to that the required driveway access aisle is not reduce to less than 10' wide. Each of the queuing spaces shall be minimum 8' wide and 18' long.

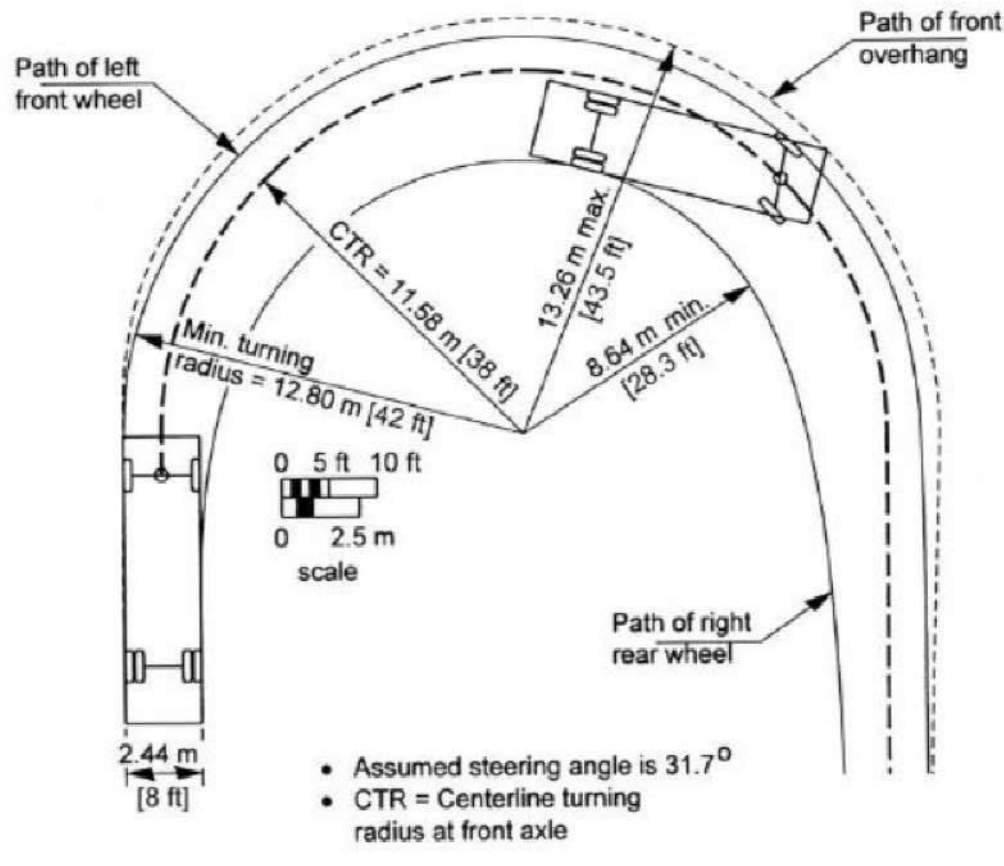
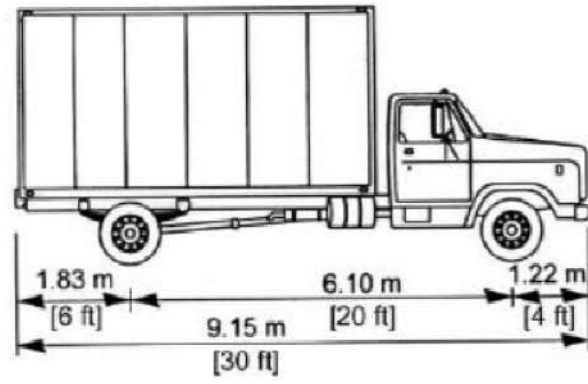
12. A "Covenant and Agreement Regarding Maintenance of Vehicle Lift System" shall be recorded with LA County Recorder's Office to maintain vehicle lift system in operable conditions at all times. [Affidavit# 43A for a 2- level lifts](#) and [Affidavit# 43B for 3-level lifts](#). The copies of the forms can be obtained from www.LADBS.org.
13. Installation of the mechanical automobile parking lift shall comply with the applicable provisions of the Los Angeles City Codes (Building, Electrical, Mechanical, Plumbing, and Fire Codes).
14. Mechanical automobile parking lift shall comply with Los Angeles Fire Department (LAFD), Fire Prevention Bureau Requirement No. 101. Refer to LAFD for additional information.
15. Separate permit and approvals shall be obtained for the mechanical and electrical work.
16. The mechanical automobile parking lift shall be installed on a level surface. The supporting structure and connections to the supporting structure shall be designed by the State of California licensed civil or structural engineer. The weight of the automobiles shall be included in determining the design seismic load.
17. Mechanical Automobile parking lifts are not permitted within required front, side, or rear yards.

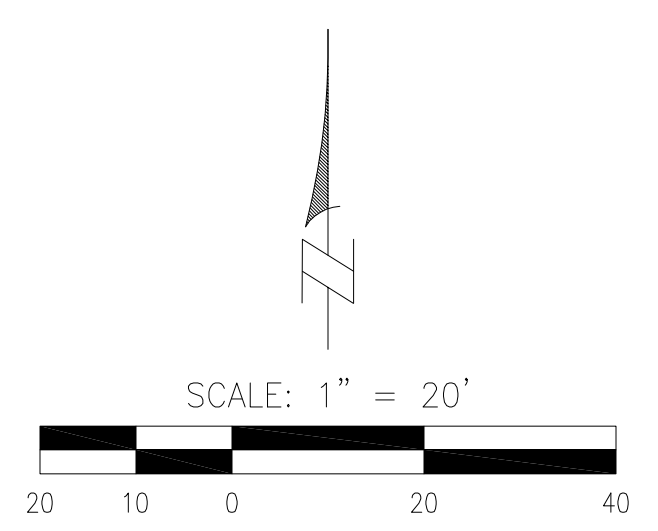
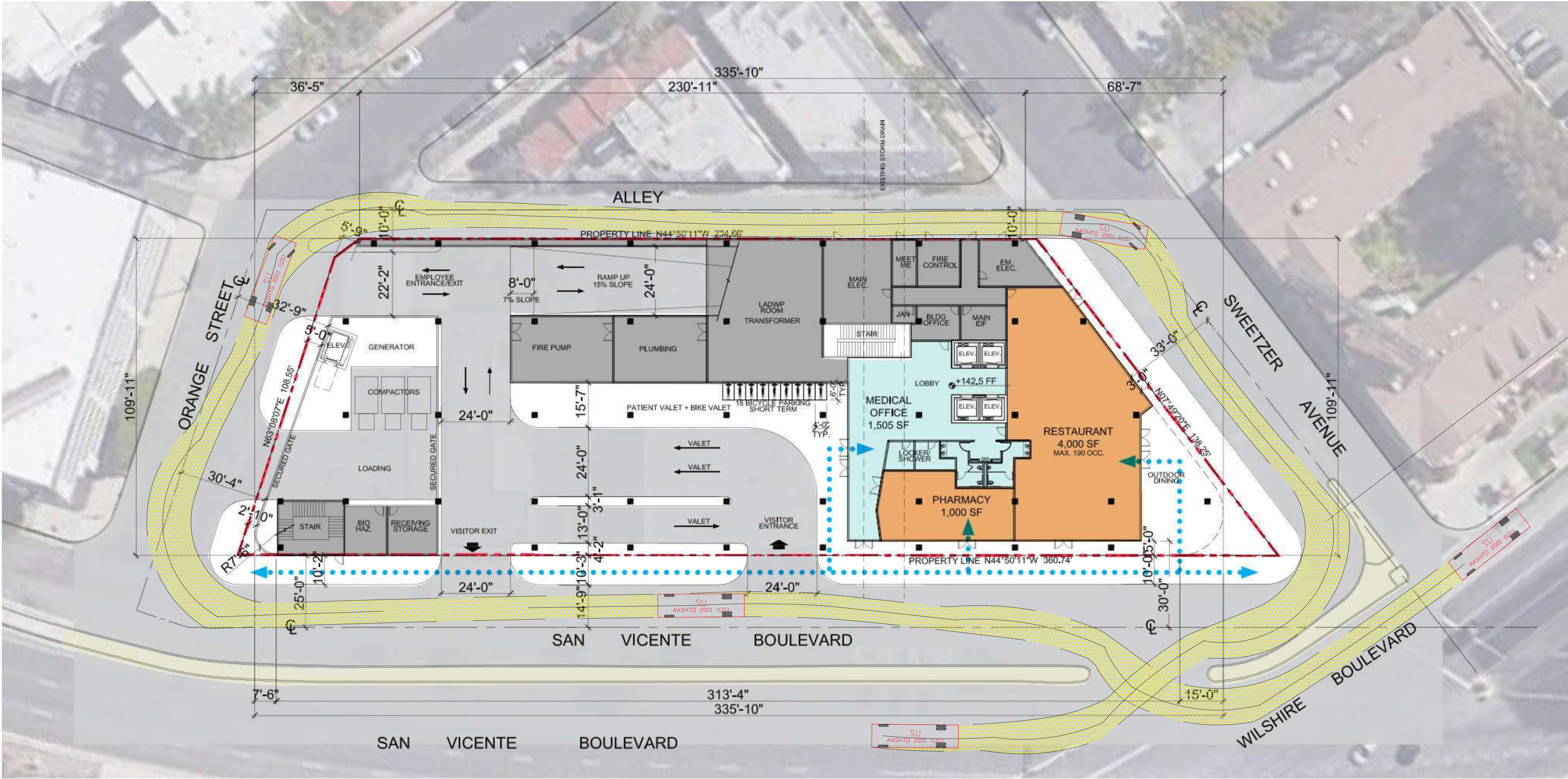
EXHIBIT 2



Detail A:
Truck Turning Radii based on AASHTO
A Policy on Geometric Design of Highways
and Streets Exhibit 2-4.

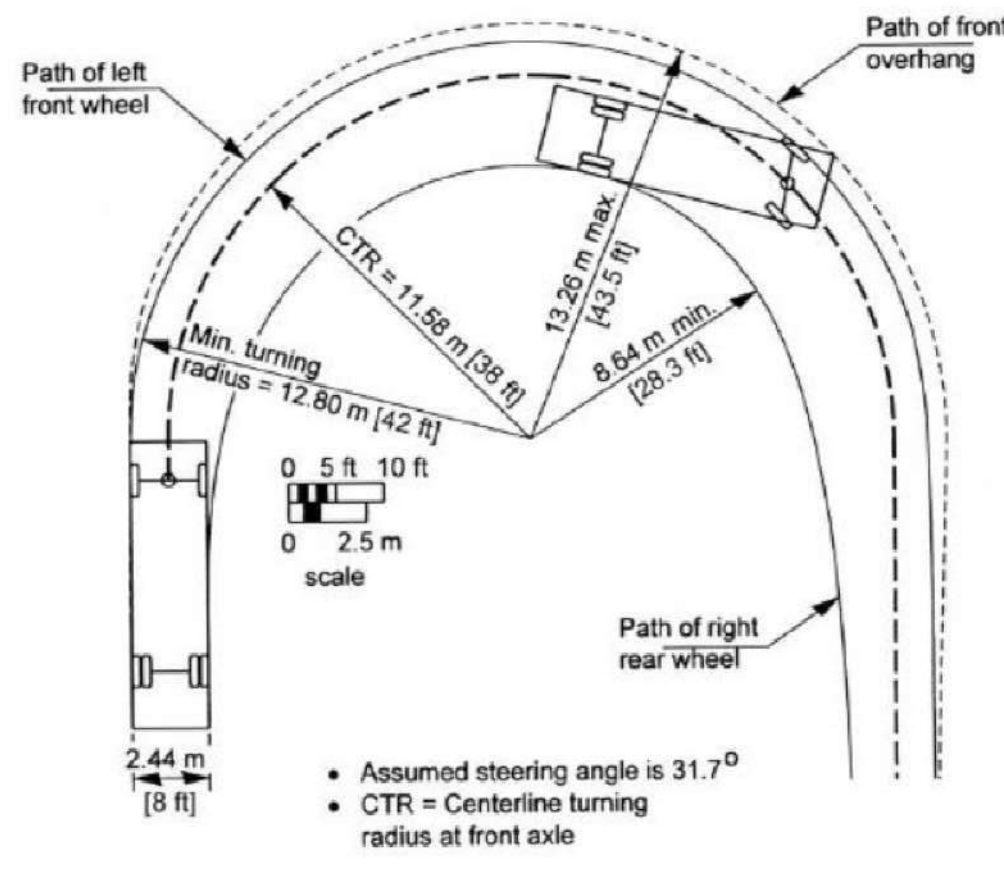
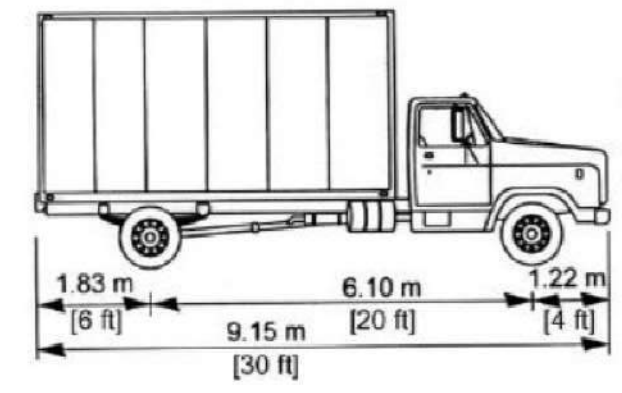
Figures are not to scale.
Single-Unit (SU) Truck





Detail A:
Truck Turning Radii based on AASHTO
A Policy on Geometric Design of Highways
and Streets Exhibit 2-4.


Figures are not to scale.
Single-Unit (SU) Truck



01/29/2022-2999/2954/2203/2954/2203/ACAD

2954/2203/Truck Turning Template.dwg Turn 2 Plotted By: Szavlos Date Plotted: 10/03/22

EXHIBIT 3

 Department of Transportation	MANUAL OF POLICIES AND PROCEDURES	SECTION NO. 531
	SUBJECT Application and Design for Striping, Channelization and Special Signing	DATE 05/2020
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Plan Preparation

Striping design plans are required for any installation that involves left-turn channelization, or lane lines, barrier lines or centerlines involving convergences, divergences, tapers, curves not parallel to curb lines or offsets. Striping plans identify all other traffic control devices.

Striping plans generally shall be prepared by the Geometric Design staff for projects involving City streets. Exceptions are as follows:

- Plans prepared by consultants for private entities as part of the B-Permit process;
- Plans prepared by consultants pursuant to an agreement with a governmental agency;
- Plans prepared by employees of another governmental agency; and
- Projects for which the Bureau Head or higher authority has approved plan preparation by a non-governmental entity.

Plan Approval

All striping design plans prepared for locations under the jurisdiction of the City of Los Angeles shall be signed as follows:

- By the Section Head of the Geometric Design Section unless that person is absent;
- By the Division Head of the Design Division unless that person is absent; and
- By the Bureau Head responsible for the Design Division, unless that person has delegated approval authority to the Division Head.

Striping design plans submitted by another governmental agency for locations partially under the jurisdiction of the City of Los Angeles shall require the signature of the Bureau Head responsible for the Design Division, or the Division Head if approval authority has been so delegated.

The practice of traffic engineering requires that striping design plans be signed and stamped by Civil Engineers registered in the State of California. Accordingly, the final approval authority for plans prepared by the Department shall be so registered and shall sign and stamp said plans. Consultants or other persons preparing or submitting striping design plans to the Department shall be so registered and shall sign and stamp said plans.

Consultants submitting plans shall meet two other requirements. First, they must have a Business License in the City of Los Angeles. Second, they must indicate on the plan that the plan has been reviewed by a person who is either registered as a Traffic Engineer in the State of California or who has a Professional Traffic Operations Engineer Certificate issued by the Institute of Transportation Engineers.

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Striping Plan Implementation

Approved striping plans are to be implemented as shown in the table below:

Initiation of Project

Department-Initiated
Street Resurfacing
B-Permits (Developers)
City Contracts & CIP
Non-City Public Agency

Installation By

LADOT Field Forces
LADOT Field Forces
B-Permit Contractor
City Contractor
Their Contractor or by LADOT Field Forces, per an approved agreement

For work otherwise performed by LADOT field forces, elements, such as sandblasting pavement message installation, etc. may be contracted out at LADOT's discretion. For work by contractors on City Streets, LADOT and the Bureau of Contract Administration must inspect and approve the striping.

In all cases, the final thermoplastic striping may not be installed until LADOT confirms that the markout is consistent with the signed plan.

Plan Format

All plans of the Geometric Design Section shall be prepared in the latest version of AutoCAD, as menu-enhanced for use by LADOT, except for those plans exempted by the Bureau Head for emergency purposes. Right-of-way, roadway and lane widths shall be shown at separate cross-sections wherever the dimensions change. All right-of-way and roadway curve radii shall be dimensioned. All striping tapers, tangents, and curve radii (if not parallel to curb) shall be dimensioned. Roadway features, striping and other traffic control devices shall be layered to reflect "existing," "to-be-removed" and "to-be-added" conditions for each stage of construction, using specified line thickness and spacing. Plans shall be on mylar, 24 inches high by 36 inches wide and 3.0 mils (0.003 inch) thick, with a specified border, title block and signature block. The scale shall be one inch equals 40 feet.

Up to three minor oversights may be manually corrected on the mylar copy of an AutoCAD plan sheet if the change also has been made on the electronic copy.

Plan Review

Striping plans are to adhere to the California Manual on Uniform Traffic Control Devices, the California Vehicle Code, LADOT Standard Plans and text herein. In using these sources, optional or "may" conditions are to be determined using engineering judgment. Recommended or "should" conditions are to be incorporated, unless there is a compelling reason to deviate. Mandatory or "shall" conditions are to be followed without exception.

In preparing or reviewing striping and channelization plans the Geometric Design Section shall be responsible for ensuring that plans adhere to the above, while incorporating critical information and concerns communicated by District Operations or other units of the Department. In considering all input, the plan shall represent the Geometric Design Section's best recommendation and should add value. Design and operational issues should be coordinated at the Associate 111, Section Head or Division Head levels, if necessary, for resolution. After a full discussion of any issues, the operational preference of District Operations generally should prevail if it is consistent with design principles and the Manual of Policies and Procedures.

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Plans more than two years old prior to installation should be newly reviewed for: any change in field conditions; appropriateness of the proposed striping design previously approved; and application of current design standards. Where changes are necessary, a superseding plan or revision shall be prepared.

If it is found to be necessary to install striping not in conformance with the plan, then an AutoCAD modification should be requested immediately by District Operations for preparation by the Geometric Design Section. The Geometric Design Section shall give preparation of the modification its highest priority if it agrees with the change. The modification shall be "rushed" for signature. However, no final striping shall be installed (i.e., beyond the markout stage) unless it is in conformance with the approved (signed) modification plan.

Plan Coordination

The Geometric Design Section shall be responsible for ensuring that the traffic signal plan is coordinated and compatible with curb, sidewalk and curb ramp features, as well as signal operation and phasing.

In this regard, the plan shall be routed to other involved units of the Department, as necessary, including the Signal Design Section and the appropriate LADOT District Office. LADOT District Office concurrence is required for any discretionary operational changes or new installations. Their concurrence shall be indicated by showing the person's initials along with the date in the title box. If the in-progress plan shows significant or operational changes, then it requires rerouting to the affected Department units for concurrence with a new date shown on the plan.

Special Projects

The Geometric Design Section is responsible for understanding how the improvements shown on an individual plan or set of plans contribute to larger projects to which they are integral, such as major developments projects. This knowledge ultimately will lead to improved design decisions. If it is not directly submitted, the Geometric Design Section is responsible for seeking the information.

Complex Designs

Complex, unusual, novel or trial designs or methods of operation for major projects should be discussed and reviewed by senior management staff before proceeding forward. This procedure will help to ensure that new designs are properly scoped, well developed and not problematic.

Plan Processing

All plans and related documentation submitted for LADOT review by consultants or other agencies, shall be submitted to the Plan Processing Control Desk of the Design Division which will route the plans to the appropriate project engineer.

Plans involving striping and signing submitted by Caltrans or another agency that are part of a larger joint project, shall be submitted first to the interagency Coordination Section for evaluation. If suitable for further review, the interagency Coordination Section shall subsequently submit them to the Plan Processing Desk or brief the design staff and/or Department management, as appropriate.

The Geometric Design Section shall seek from consultants submitting plans justification for any operational changes proposed in the plan. Proposed operational changes shall be justified by realistically projected traffic volumes associated with the immediate phase of land development

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or re-development and yet should anticipate the operational needs for ultimate build-out of the final phase of related land development. Proposed operational changes shall not unduly compromise traffic safety or pedestrian circulation.

Plans that are being submitted for approval by consultants shall include two mylar originals and a compact disk. One of the mylar originals is to be returned to the consultant after plan approval. The Geometric Design Section shall check to see that the contents of the compact disk submitted by the consultant are consistent with those on the mylar plan, and that any minor oversights that have been manually corrected on the mylar copy of an AutoCAD plan have been incorporated on the electronic file prior to further processing of the plan.

After the plan is approved, the electronic file immediately shall be modified by the Geometric Design Section to show in printed form the names, initials and dates of all persons who were part of the design approval and submittal.

As-Built Plans

As-Built plans are an important part of the record of field conditions as of a certain date. Striping plans shall timely record the dates for "Mark-out Completed". The electronic files of said plans shall timely be revised to show the same information.

Geometric Design Plan Files

All signed and "As-Built" Geometric Design plans (mylars and electronic files) shall be stored in the Geometric Design Section as the City's official record. Superseded "As Built" plans shall be sent to LADOT Records for placement in the archival file.

Filed plans shall not be removed from the file except for brief reference or copying. If prolonged reference to a plan is needed then a photocopy or print copy shall be made.

Geometric Design Plan Distribution

One copy of all signed plans are to be distributed to the appropriate LADOT District Office. In addition, three copies are to be given to the Field Coordination Section for projects involving street resurfacing.

Striping Fundamentals

The primary function of striping and channelization is to delineate as clearly as possible the intended operation and desired travel paths.

Materials used for channelization include:

- Raised curb or berm for medians and islands;
- Raised ceramic and reflective pavement markers;
- Delineator posts;
- Painted striping;
- Permanent and detour grade pavement marking tape; and
- Alkyd-based thermoplastic striping;

Raised median islands can be used to prohibit left turns, separate opposing flows and provide landscaping opportunities. However, at signalized intersections they sometimes can create negatively offset left turns with restricted visibility. In some cases they should be partially removed at signalized intersections, as discussed in S-497.0.

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Raised ceramic pavement markers may be selectively used where striping requires excessive maintenance. Raised reflective pavement markers may be selectively used where modern street lighting does not exist.

Flexible delineator posts can be used to delineate the edge of roadway that lacks conventional curbs and modern street lighting.

Painted striping is the most common form of pavement delineation in most jurisdictions. However, it requires frequent maintenance.

Permanent pavement marking tape may be used to replace short sections of striping that have been removed due to minor street excavations. Detour grade pavement marking tape may be used to cover existing striping and to delineate detour striping for periods of six months or less. It is easily installed and removed.

Alkyd-based thermoplastic striping is the primary form of pavement delineation in the City of Los Angeles and has a five to ten year service life. However, a primer is required to ensure adhesion on Portland cement concrete surfaces.

See Table 1, "Application of Striping and Marking Components," which summarizes the use of each type of traffic stripe.

Striping on Narrow or Lower Volume Streets

Striping generally is not necessary on low volume local streets. On collector streets a skip centerline should be provided, as width permits. (See Lane Widths).

A double yellow-centerline should be provided instead of a skip centerline, as follows:

- Where horizontal or vertical alignment limits sight distance below that which is appropriate for the design speed.
- Within 50 to 200 feet of a Stop sign, traffic signal or marked crosswalk.
- Within 50 to 200 feet of a taper and along the length of the taper.

A double yellow centerline or partial passing centerline shall be provided instead of a skip centerline where two or more lanes are striped in one direction, with one lane in the other direction.

Where a partial passing centerline is used, the skip yellow stripe shall be for the direction with one lane.

On streets with two or more lanes in each direction a double yellow centerline, raised median island or left turn channelization shall be provided.

Left-Turn Channelization

Left-turn channelization is the single most effective tool for improving operation and reducing accidents, such as rear-end, side-swipe, head-on and left-turn types. It is delineated by the two-way left-turn lane, the (unidirectional) left-turn pocket and the striped median. Generally, it is desirable for all arterial streets to operate with at least two lanes in each direction and left-turn channelization (five-lane operation). Where continuous channelization is not feasible due to width restrictions, every effort should be made to install left-turn pockets at signalized intersections, or alternatively, to restrict left turns. Generally, a five-lane operation has been

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shown to operate more smoothly than a six-lane operation without channelization, where the width permits. A three-lane operation has been shown to operate more smoothly than a two-lane off peak/four lane peak operation with fronting development, where the width permits.

The designer of striping and channelization needs to consider the benefits above when a street is being reviewed for striping improvements. In addition, the designer needs to carefully consider the trade-offs between the appropriate and achievable lengths of left turn pockets at intersections versus those for two-way left-turn lanes (2WLTL) to serve mid-block driveways. All left-turn lanes at intersections should be "shadowed," so that the departure side of a mandatory left-turn lane is a left-turn lane in the opposite direction, a striped median or a raised median.

Where 2WLTL's are being considered in a hillside area or on a street with steep grades or sharp crest or sag vertical curvature, the sight distance should be field checked to ensure that opposing motorists can see each other. If there is any doubt, civil engineering profiles and vertical sight distance formulas should be used for verification. If sight distance is inadequate then a striped median shall be used instead of a 2WLTL.

Generally, the following minimum storage lengths of fully shadowed left-turn channelization should be utilized:

Two Way Left Turn Lane (2WLTL):	30 feet
Collector Street at non-signalized intersection:	40 feet
Collector Street at signalized intersection:	60 feet
Arterial Street at non-signalized intersection:	40 feet
Arterial Street at signalized Collector Street:	60 feet
Arterial Street at signalized Arterial Street:	100 feet

Where these storage lengths are not feasible, traffic often can spillover into the number one through lane. In these instances, left turn restrictions rather than left-turn lanes should be considered.

Multiple left-turn lanes require special design considerations at standard intersections (i.e. two-way streets, four legs and right angle alignment). They present unique challenges to the ability of left-turn motorists to see opposing through traffic and pedestrians in the receptive leg of the intersection. Accordingly, dual left-turn lanes at standard intersections shall have protected left-turn phasing. A left-through lane adjacent to a left turn lane presents the same challenges. In addition, this operation can result in lane blockage as left-turn motorists wait for gaps in opposing traffic. Accordingly, the entire approach shall be phased separately from that for opposing traffic. In addition, this operation should be phased separately from that for pedestrians.

Applications of left-turn channelization are shown in S-401.0, S-401.1 and S-414.4. Visibility requirements for motorists in left-turn lanes are shown in S-497.0.

Right-Turn Channelization

All right-turn lanes should be "shadowed" on the far-side of intersections. Shadowing for a right turn lane includes an undelineated curb lane, reduced roadway width, a raised island, or a striped island on the departure side. A receptive through lane on the far side of an intersection directly opposite a right-turn only lane can result in confusion and or misuse of the turn lane.

Physical gores for divergences or right turn lanes should be preceded by painted gores which, in turn, should be preceded by barrier lines. In trap lane situations, the barrier line is preceded

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by lane drop striping which is, in turn, preceded by standard lane lines. This hierarchy of striping helps to alert motorists of changing conditions.

Multiple right turn lanes require special design considerations. Dual right-turn lanes and right plus right-through lanes present challenges to the ability of motorists to see pedestrians in the receptive leg of the intersection. Accordingly, they should be phased separately from that for pedestrians or evaluated as to necessity.

Channelized right turns having raised triangular islands, which separate them from adjacent lanes under traffic signal control, can have several types of control. Generally, they are controlled by R 1-2 (Yield) signs. However, where the approach speeds are 10 miles per hour or below, visibility is restricted or pedestrian volume is high, R1-1 (Stop) sign control is used. Where there is sufficient longitudinal distance for acceleration a W4-1 (Merge) sign is posted on the receptive leg of the intersection and a W11-2 and W16-?p (Pedestrian Crossing) sign is posted at the diagonal marked crosswalk near the middle of the raised island. Where the channelized right turn forms a continuous added lane on the receptive leg of the intersection a W4-3 (Added Lane) sign is posted along with a W11-2 and W16-?p sign as described above. W4-2 (Lane Drop) signs are not used for channelized right turns. The alternative types of control shall not be mixed. See S-494.0 for specific details.

Lane Widths

Lane widths are measured from the center of a striped line to the center of an adjacent striped line and from the center of a striped line to the curb (flow line). Generally, all raised islands should have edge line striping and all arterial streets lacking standard curb should have edge line striping.

While 12 feet is the standard lane width for high speed, limited access thoroughfares, such a width often isn't practical for standard street dimensions in the City of Los Angeles. Accordingly, the lane width standards shown in the table below are to be used. "Desirable" widths should apply to new construction wherever feasible. "Absolute Minimum" widths that are less than "Minimum" widths should be used only after very careful consideration of the relative safety impacts of the operational options.

Standard Lane Widths

<u>Application</u>	<u>Desirable</u>	<u>Minimum</u>	<u>Absolute Minimum</u>
Left Edge Line	Gutter width or 2' from curb	1' from curb	(See Minimum)
Right Edge Line	2'-8' from pvmt edge	1' from pvmt edge	(See Minimum)
Interior Thru Lane- 35mph & Below	11'	10'	9'
Interior Thru Lane - 40 mph & Above	12'	11'	10'
Interior Thru Lane - High truck/bus vol	12'	11'	10'
Interior Thru Lane- Adj. To Bike Lane	12'	11'	10.5'

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Left Turn Lane	12'	10'	9'
2-Way Turn Lane	12'	10'	9'
Curb Lane- No Parking	13'	10'	(See Minimum)
Curb Lane w/Parking	19'-26'	18'	(See Minimum)
Curb Lane w/ Parking & Continuous Edge Line	19'-26'	18'	17'(7'+10')
Curb Bike Lane	7'	5' with gutter 4' no gutter	(See Minimum)
Bike Lane w/Parking & Continuous Edge Line	15'	13'	12'
Interior Bike Lane	7'	5'	4'

Intersection Striping

Striping generally is discontinuous through intersections. However, multiple turn lanes, curves, tapers or offsets at or near intersections require supplemental delineation in order to reduce the probability of side swipe or head-on accidents. Continuous (unbroken) striping through intersections generally is not used for this purpose, as it would eliminate an important clue relating to intersection presence. Accordingly, short lengths of broken lines, known as "cat-tracks" are used within intersections, where additional delineation is needed. See S-405.0 for specific details.

Marked Crosswalks

Marked crosswalks shall be installed where:

- Pedestrians are allowed to cross at signalized intersections
- A pedestrian crossing is necessary, but a legal un-marked crosswalk does not otherwise exist, as per Section 275(a) of the Vehicle Code.

They may be installed at locations satisfying Section 275(a) of the Vehicle Code where:

- Pedestrian crossings are frequent and the warning devices associated with the marked crosswalk will so advise motorists.
- It is desired to advise pedestrians of a preferred crossing; or
- It is desired to channelize pedestrians to a single crossing.

Marked Crosswalks shall be aligned so that they meet two criteria:

- There is a buffer zone between the edge of the marked crosswalk and the adjacent lane of parallel traffic. Acceptable buffer zones include all-day parking lanes, right-turn lanes, curb lanes of 14 feet or greater, or, with narrower curb lanes, a 2-foot set back from the curb line extended.

- The area between the middle of the curb return and the point of intersection of the crosswalk lines is not so great so as to inadvertently invite pedestrians to wait in the street.

See S-490.0 for specific details on aligning crosswalks.

Marked crosswalks across uncontrolled approaches should be installed with discretion. Because some pedestrians may be over-confident that motorists will yield to them, a full complement of traffic controls is necessary to advise motorists of the marked crosswalk. S-481.0 is used for this situation and shows advance and intersectional signing and pavement messages. Most importantly, it requires approach red curb necessary for motorists to see pedestrians entering the roadway from a safe stopping distance.

Continental-style markings enhance the visibility of marked crosswalks and they shall be used at uncontrolled approaches on arterial and high-volume collector streets and at all midblock crossing locations, unless the crosswalk has a stamped thermoplastic pattern.

Also see S-493.0 regarding crosswalk locations.

Curves

Curves in the roadway can present special challenges to motorists, which in turn may require special traffic control devices. Where the design speed of the curve is greater than the speed limit and street lighting is provided then curve warning signing is not necessary. Otherwise, it should be provided. Where the design speed of the curve is less than the speed limit then the curve warning signs should be supplemented with advisory speed (W13-1) signs. Curves with a central angle of 90 degrees or more should be posted with W1-1a or W1-2a signs.

The table below can be used as a guide to determine the approximate design speeds and appropriate warning signing for curves:

<u>Approximate Design Speed</u>	<u>Centerline Radius</u>	<u>Curve Warning Signs</u>
15 mi/hr	50 feet	W1-1 or W1-3
20	150	"
25	250	"
30	400	"
35	600	W1-2 or W1-4
40	800	"
45	1,000	"
50	1,400	"
55	1,800	"

In addition to the above signing, other curve-related signs may be required. For curves where the difference between the design speed and speed limit is 10 miles per hour or greater W1-6 or W1-8 signing should be considered. W1-6 signs should be used for relatively short lengths of curve and should be installed singly facing head-on traffic. W1-8 signs should be used to emphasize longer curves and ideally should be spaced so that a minimum of three are in view throughout the curve. See S-501.0 for application of W1-8 signs.

Curves at intersections may require intersection striping as per S-405.0 and protected left-turn phasing as per S-497.0.

Transitions

Angle-point tapers are the most common method for implementing a transition. However, the curve-tangent-curve (C-T-C) method provides a smoother transition and, in some cases, provides a shorter length of transition than does tapering. On arterial streets the curve radii should be provided as shown above. In addition, the minimum length of the C-T-C tangent should be two seconds of travel time at the design speed. However, it shall not be less than 50 feet. Compound tapers shall not be used.

Where a non-arterial street has a jogged alignment at a traffic signalized intersection reverse curve cat-tracking should be provided as per S-100.0. A tangent may be deleted in this situation.

Posted speed limits and their associated minimum taper rates are shown below. The taper rates shown reflect a speed that is 5 mph above the posted speed limit. Generally, a higher five-unit increment such as 25 to 1, 30 to 1, etc. should be used, unless there would be a significant adverse impact to curb parking spaces.

<u>Posted Speed Limit, mph</u>	Minimum Taper Rate
25	15 to 1
30	20.5 to 1
35	26.7 to 1
40	45 to 1
45	50 to 1
50	55 to 1
55	60 to 1

Bikeways

Where feasible, bikeways are installed to provide a network to encourage use. Users tend to fall into four categories: recreational users, school children, college students and commuters. Many of the City's bikeways are located near recreational parks and playgrounds, areas of scenic beauty, schools and colleges and efforts are underway to develop a broader network.

Bikeways fall into three following categories:

Class 1 bikeways are off-street paths, which can be used by bicyclists and pedestrians, and usually are found in recreational areas where right-of-way is available. These tend to include parks, beach areas, and flood control channels.

Class 2 bikeways are on-street bike lanes. They are appropriate along arterial streets where it is believed that a potential user demand exists, where the street is sufficiently wide to allow the addition of bike lanes and where a policy decision has been made that bike lanes are a higher priority than any future addition of vehicle lanes.

Class 3 bikeways are signed routes with no separate lanes. They are appropriate along low volume residential and collector streets where there is inadequate width for separate bike lanes. They sometimes may be appropriate along short segments of higher volume arterial streets where they provide continuity to longer reaches of bike lanes and bike paths.

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Lane Additions

Short lengths of added through lanes generally are not advisable because they must terminate abruptly, resulting in weaving sections which can compromise the safety and capacity of the adjacent lane. Thus, they should not be developed for lengths less than one-half mile. In such cases, right-turn lanes may provide a better operation.

Generally, on two-way streets added through lanes should be designed to start on the right side of the street and there should be only one lane added per block. On one-way streets added through lanes may be designed to start on the right or left side of the street, but there should be only one lane added per side per block.

Where right-turn-only lanes that are less than 18 feet wide are added, they should be preceded by 80 feet of red curb so as to allow unobstructed entry into the lane. Where there would be significant adverse impact to curb parking availability then no less than 40 feet of red curb shall be used.

Lane Reductions

Lanes are reduced by lane dropping or by mandatory turns or divergences. Both methods require a sufficient length of unobstructed downstream reception width to allow the motorist to understand the situation, seek a gap in the adjacent lane and transition from the discontinued lane to the adjacent lane, as per S-485.0 and S-491.0. Note that S-485.0 shows a series of posted warning signs and pavement arrows, while S-491.0 also shows a series of posted signs and "elephant track" striping in order to meet this objective. Mandatory turn lanes that are necessary for lane reductions should terminate at signalized arterial intersections and not at local or collector streets.

When a bottleneck restriction is being eliminated the designer should evaluate the striping for one-half mile in each direction. This evaluation will help to determine if lane reductions were necessitated by the bottleneck restriction and if the lane reduction can be eliminated, thus resulting in a consistent number of lanes.

Pavement Messages and Symbols

The size and shape of pavement and messages shall be consistent with those shown in the California Manual on Uniform Traffic Control Devices.

Where Stop sign control is utilized for the through and left-turn lanes on arterial and high volume collector streets "Stop" pavement messages should be installed at the limit lines and advance Stop Ahead" pavement messages and signing should be installed on the approaches to supplement R1-1 and W3-1 signing.

"Wait Here" pavement messages should be installed in conjunction with the limit lines where:

- the stopping point is not at the marked crosswalk;
- pedestrian crossings are prohibited and the speed limit is 45 miles-per-hour or greater;
- or
- pedestrian crossings are prohibited and the intersection has an unusual alignment, such as a skew.

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Pavement arrows are installed at the beginning of turn and optional turn lanes. They also are installed mid-length in long turn lanes. See S-456.0 for specific details.

"Keep Clear" pavement messages supplement regulatory signs, such as R8-8, R10-7 and R 10-6 signs. Otherwise, they are advisory and unenforceable. Some applications are shown in S-493.0.

Angle Parking

Angle parking is parking that is not parallel to the curb and is considered where the number of curb parking spaces is inadequate. Motorists using angle parking spaces must exercise additional caution when backing out, as compared with parallel curb spaces, due to limited sight distance. For this reason, they are acceptable on residential and collector streets because speeds are relatively low and motorists tend to expect local access interruptions. However, on higher speed arterial streets sight distance may be inadequate with conventional angle parking design and a backing vehicle tends to be an unexpected condition. Accordingly, angle parking is permissible on arterial streets only where there is sufficient receptive room to accommodate the backing vehicle without crossing into a lane.

On-street angle parking dimensions use off-street parking lot dimensions, as established in the Municipal Code. See S-440.0 for the dimensions associated with angle parking. The dimensions assume a 2-foot overhang beyond the curb. In addition, they provide a buffer area between the back of vehicle and the lane, so as to accommodate rear vehicle loading.

Angle parking requires additional red curb on the approaches to Stop signs, as indicated in S-481.0, Note 7.

Narrowed Roadways

Roadways that suddenly narrow can present a surprise situation for unfamiliar motorists. A combination of special striping and sign is used to advise of this condition, as shown in S-444.0.

Exclusive Bus Lanes

Exclusive bus lanes are relatively rare and tend to be confined to the Central Business District. Special striping, pavement markings and signing helps alert unfamiliar motorists to their exclusive use. See S-487.0.

Speed Humps

Speed humps can be considered for use on non-arterial streets which experience speeding problems. They encourage motorists to drive slower and/or to use alternate arterial streets for through travel. Distinctive markings and signing are used to advise motorists of this special roadway feature. They are shown in S-483.0.

Signalized Jogged Intersections

The design of signalized jogged intersections is one of the most complex tasks in traffic engineering. Motorists can face the following challenges from one or more of the four approaches to a signalized jogged intersection:

- Pedestrians might not be seen early-on.
- Opposing vehicles might not be seen early-on.
- Opposing left turns interlock.

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- A reverse turn maneuver versus a single turn cannot readily be distinguished.
- Motorists must determine if there is one versus two intersections and how to respond at each.

These challenges can be mitigated by providing a full complement of controls and applying them in a uniform manner. S-100.0 shows the options available for a variety of conditions. A primary consideration is whether or not to provide interior limit lines, so as to create two intersections. If the internal storage is 40 feet or more then interior limit lines are to be provided. A second consideration is whether or not to provide exclusive or semi-exclusive phasing for the jogged approaches, due to the challenges resulting from the physical separation. If opposing motorists are separated by more than 20 degrees, then some type of exclusive phasing is to be provided. Finally, a third consideration is whether the streets are offset to the left or offset to the right of each other. Offset-left locations may require slot clearance and protected left-turn phasing. Offset-right locations may require special treatment to overcome left-turn interlock. The striping, signal phasing and placement of signal heads is determined from the above considerations and the specific geometry of the intersection.

Freeway Guide Signs

Freeway guide signs generally fall into two categories - "lane assignment" and "action".

Due to the various types of on-ramp configurations, some freeways can be entered from the right lane while others can be entered from the left lane. Accordingly, multi-lane streets having access to freeways shall be posted with "lane assignment" signs. "Action" freeway guide signs are an essential follow-up to "lane assignment" signs.

Generally, overhead signing is the most effective means of communicating freeway access to motorists. Roadside guide signing on the right or in a raised median can be used where overhead signing is not immediately feasible. However, roadside guide signing has limited area for text and may require more signs for communicating lane assignment. See S-476.1 which shows the maximum sign area that may be installed for various postings.

The various formats for freeway guide signing are shown in S-418.5 and S-418.6.

Overhead Guide Signs

Overhead guide signs provide a high degree of visibility to forewarn and direct motorists on multilane approaches of access or lane assignment conditions that generally cannot be anticipated. Conditions include:

- Divergent arterial roadways
- Skewed arterial approaches
- Unshadowed left-turn lanes
- Arterial grade separations, including freeways
- Bus and/or carpool lanes
- Street name or sign route changes
- End of one-way operation

These situations are illustrated in S-418.6.

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Street Name Signs

In the City of Los Angeles street name signs shall be posted at all intersections on the near right of each approach. The format is shown in S-438.0. The various applications are shown in S-221.3. At signalized intersections supplemental large street name signs are to be posted as per S-486.0.

One-Way Signs

At signalized intersections with one-way streets the large supplemental street name signs are to be further supplemented with large R6-1 (One-Way) signs as shown in S- 473.0.

End of Roadway

W31 (CA) (End) signs and OM4-3 signs should be used at the termini of streets lacking cul-de-sac designs and on streets with cul-de-sac designs, where the frontage of the cul-de-sac is not fully developed. See S-446.0.

At the beginning of the block preceding the terminus a W14-1 (Dead End) sign should be posted. In addition, striping, if any, should be terminated 100 feet or more in advance to provide another clue as to its discontinuity.

Roadway Objects

Non-yielding fixed objects within the roadway should be avoided wherever feasible, so as to provide a forgiving roadway environment. However, where not feasible nonyielding fixed objects should be provided with impact attenuators.

Landscaping

Trees within the public right-of-way should be located so that the visibility of traffic signs and traffic signals is not impaired when the trees mature.

New roadside trees shall not be planted within 50 feet of the approach to a Stop sign or signalized intersection nor within 25 feet of the departure from such an intersection.

Landscaped islands should be considered only on straight roadway alignments, or large radius curves. The minimum median width for islands with trees or other fixed objects shall be 7 feet (6-foot planting space). The island curb shall be designed to provide a striped centerline or edge line at least one-foot from the curb, with a preferred offset of two feet. The island ends shall be rounded, with a half circle curve not less than 2 feet in radius. The minimum length of an individual island should be 100 feet.

Plantings on islands should be limited to a maximum mature height of 3 feet wherever driver visibility is required, particularly near traffic signals or other traffic controls. Trees, monument signs or other streetscape features should be located no closer than 50 feet from the nose of the median island, if it is near an intersection. Planted trees should be centered between the two sides of the island.

City Limit and Community District/Name Signs

S-502.0 shows the standard format for City Limit ("City of Los Angeles") and Community Name/District signs. In some cases, neighborhood groups may desire distinctive, unique

signing. Specifications and guidelines are shown for these signs in S-502.0. The Department will allow these signs to be posted in accordance with the provisions in S-502.0 and a Street Use Permit. However, due to their unique nature and the multitude of designs, the Department will not inventory nor maintain them.

Table 1 Application of Striping and Pavement Markings		
Striping/Marking Component	Application	Reference to California MUTCD
Skip Centerline	Allows passing of opposing traffic on two lane streets.	Figure 3A-101 (CA), Detail 1 and Figure 3B-1, a
Partial Passing Centerline	Allows passing of opposing traffic generally on two-lane streets from one direction only.	Figure 3A-103 (CA), Detail 15 and Figure 3B-3, a
Double Yellow Centerline	Prohibits passing of opposing traffic, but allows crossing.	Figure 3A-104 (CA), Detail 21 and Figure 3B-2, a
Striped Median	Striping that separates opposing traffic flows and prohibits passing and crossing. Internal separation must be at least two feet for enforcement.	Figure 3A-107 (CA), Detail 28 and Figure 3B-4
Two-Way Left-Turn Lane (2WLTL)	Provides midblock left-turn storage. May be used at non-signalized intersections to provide storage for both intersectional left turns and nearby driveways from the other direction.	Figure 3A-108 (CA), Detail 31 and Figure 3B-7 (CA)
Left Edge Line	Delineates the left edge of roadway or median and is parallel to the edge of roadway.	Figure 3A-105 (CA), Detail 24
Left Channelization Line	Delineates left edge of travel path where it is not parallel to the edge of roadway.	Figure 3A-104 (CA), Detail 21
Cigar Nose	Delineates a tapered striped median at "T" intersection crossings. It is commonly used where the left-turn radius from the stem roadway of the "T" is less than 70 feet or where it is not necessary to provide left-turn storage into driveways near the top of the "T" via a 2WLTL.	Figure 3B-2, b
Reversal	Identifies and provides the reverse curve travel path into a unidirectional left-turn lane or a 2WLTL.	Figure 3B-2, b
Left Edge Cross Hatch	Provides emphasis in striped medians or between the left edge of roadway and Left Channelization Line or Left Edge Line, at least 5 feet in width. Also, it clarifies that the area is not part of the traveled way. Is aligned at 45 degrees diagonally forward with respect to the direction of travel.	Figures 3B-5

Table 1 - Application of Striping and Pavement Markings (Cont'd)

Reversible Lane Marking	Delineates a lane that is reversed in directional flow during various times of the day.	Figure 3B-6
Lane Line	Separates concurrent through lanes.	Figure 3A-102 (CA), Detail 8
Barrier Line	Separates turn lanes from through lanes or other turn lanes.	Figure 3A-112 (CA), Detail 38A
Right Edge Line	Delineates the right edge of roadway and is parallel to the edge of roadway.	Figure 3A-106 (CA), Detail 27B
Right Channelization Line	Delineates right edge of travel path where it is not parallel to the edge of roadway.	Figure 3A-112 (CA), Detail 38A
Striped Island	Physically separates converging or diverging traffic flows and prohibits vehicular crossing. Internal separation must be at least 2 feet for enforcement.	Figure 3B-8 (CA), 3B-9 (CA), 3B-12 and 3B-15
Lane Drop Line or "Elephant Track"	Transition striping for an entrapped-turn lane or an advance turn lane. See S-491.0.	Figure 3A-111 (CA), Detail 37B and Figure 3B-11 (CA)
Bike Lane Line	Separates the travel path between bicycles and motor vehicles. The Bike Lane Line is broken at least 96' upstream of the intersection in order to identify where right turning motor vehicles may cross the bicycle lane.	Figure 3A-112 (CA) Details 39 and 39A, and Figure 9C-6
Right Edge Cross-Hatch	Provides emphasis in striped islands or between the right edge of roadway and Right Channelization Line or Right Edge Line, at least 5-feet in width. Also, it clarifies that the area is not part of the traveled way. Is aligned at 45 degrees diagonally forward with respect to the direction of travel. See S-444.0 and 485.0	(Not Shown)
Chevron	Provides emphasis within a striped island or a gore area at least 5 feet in width where concurrent traffic travels on either side. See S-493.0, Sheets 5 and 6 of 7.	Figure 3B-12 and 3B-15, c
Hook (Wrap) and Bar	Used at the downstream end of a Barrier Line for a Trap Turn Lane, where the adjacent lane is a through lane. Where the adjacent lane is a concurrent turn lane the Bar is not used. See S-491.0 and S-405.0.	Figure 3B-13, d
Crosswalk (Marked)	Emphasizes the legal crosswalk at signalized intersections, indicates a preferred legal crosswalk at non-signalized intersections, and identifies a legal marked crosswalk where no legal unmarked crosswalk exists. Parallel lines, 12" wide generally are 15 feet or 10 feet apart, with minimum width of 10 feet. See S-490.0 and S-493.0.	Figure 3B-17

Table 1 - Application of Striping and Pavement Markings (Cont'd)

Crosswalk (Marked), Continental Style	Used at uncontrolled crossings on arterial streets, high volume collector streets and midblock crossings with 2-foot-wide run markings. See S-481.0, S-481.1, S-490.0, and S-493.0.	Figure 3B-19
Crosswalk (Marked), Ladder Style	Used under the same conditions as the Continental Style Crosswalk, though the Continental Style is preferred. See S-481.0, S-481.1, S-490.0, and S-493.0.	Figure 3B-19 (CA)
Limit Line	Indicates the stopping point at Stop signs and traffic signals without crosswalks. Is 12 inches wide. See S-493.0.	Figure 3B-23 (CA)
Yield Line	A layout of triangular markings which indicates the point at which to yield in conjunction with a Yield sign.	Figure 3B-16 (CA) and Figure 3B-17 (CA)
Railroad Stop Line	Indicates the stopping point adjacent to railroad crossings.	Figure 8B-7 (CA)
Turn Arrow	Emphasizes a mandatory turn lane or optional turn lane not otherwise permitted. It must be accompanied by complementary regulatory signs in order to be enforceable, except for conventional right-turn or left-turn pocket lanes. See S-456.0.	Figures 3B-24 (CA), Types IV, VII and VIII arrows
Intersection Strip or "Cat Track"	Clarifies travel paths within intersections for multiple turns, or a curved or tapered travel path. Applicable to Double Yellow Centerlines, Barrier Lines, Lane Lines and Bike Lanes. See S-405-0.	Figure 3A-112 (CA), Details 40 and 41
Pavement Marking Legend	Emphasizes and complements warning or regulatory signs.	Figure 3B-20 (CA)
Speed Hump Marking	Emphasizes a speed hump. See S-483.0.	Figure 3B-29
Advanced Speed Hump Markings	Provides advanced warning to drivers of an upcoming speed hump.	Figure 3B-31
Parking Stall Marking	Identifies parallel curb parking spaces in parking meter zones and when there is high turnover. It provides orderly and efficient use of available curb space. See S-404.1.	Figure 3B-21 (CA)
Diagonal Parking Stall Markings	Used in special situations where there is a high demand for curb parking and additional spaces can be provided by diagonal stalls. See S-440.0.	(Not Shown)
Lane Drop Arrow	Identifies the discontinuation of a through lane at a mid-block location. See S-485.0.	Figure 3B-24 (CA), Types VI arrow and Figure 3B-14 (CA), Sheet 1 of 3

EXHIBIT 4



FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT # 74

MECHANICAL (DEPENDENT ACCESS) AND AUTOMATED (INDEPENDENT ACCESS) PARKING DESIGN

The provisions of this document shall regulate the use of mechanical and automated parking systems by addressing the arrangement, location, size of areas, height, separations, housekeeping, and fire protection.

Scope:

The Los Angeles City Fire Department (LAFD) design requirements for the outdoor and indoor use of mechanical parking (dependent access) systems including *mechanical car stackers - 2, 3, and 4 levels high, and pit systems*; and automated parking systems (independent access) including *Semi-Automated or Puzzle Parking Systems, Carousel Parking Systems, Automated Rack and Rail Systems, and Automated Guided Vehicle Systems (AGV)*.

Definitions:

- *Access Road* - A designated way for vehicular travel, which provides access from a public street or alley to buildings or structures upon the premises.
- *Anti-Fall System* - A safety system used to prevent the fall of platforms in the event of a cable or chain break while in the raised position.
- *Anti-Sway Devices* - Mechanical and Automated Parking Systems using a suspended platform must provide an anti-sway device to prevent a platform from swaying into other platforms or vehicles while being lowered.

EXCEPTION: Suspended platforms located over a shared drive aisle two levels high in an attended garage.

- *Automated Guided Vehicle Systems (AGV)* - Free roaming robots that store vehicles in a multi-level parking storage area with continuous floors that move in common drive aisles or under vehicles. AGV systems can either use pallets or comb technologies to handle vehicles. Vehicles are dropped off in loading bays by users and then transferred to the parking storage area by the AGVs and Vertical Reciprocating Conveyors (VRCs).
- *Automated Rack and Rail Systems* - Multi-level automated parking systems commonly integrated into a building structure typically with an open atrium or multi-tiered open storage racks and shuttle ways. The system uses common

VRCs, shuttles, and dollies to transfer vehicles from common loading bays to the parking storage area. Public occupancy is typically prohibited in the parking storage area with a maximum floor area allowance per occupant of 500 or less.

- *Car Stacker Pile* - A floor area of a single array of mechanical, semi-automated parking systems, and carousel parking systems separated from other car stacker piles by main aisles, fire separation walls or occupancy separations. A car stacker pile shall be limited to 50,000 cubic square feet. Every building must be fully sprinklered.
- *Carousel Parking Systems* - Mechanical equipment consisting of an open steel structure typically two parking spaces wide that supports 6 to 12 movable platforms for the stacking of vehicles vertically. The platforms are connected together and move vertically and rotate around a vertical carousel. A trained operator will perform the functions. Carousel systems may be installed as a single unit or in an array of units sharing common supports between units. Carousel systems are electric and can be installed indoors or outdoors. Carousel systems are an independent access system.
- *Catwalk* - A horizontal walkway with a minimum clear width of 36" and maximum length of 150' for outdoor installations and 100' for indoor installations. Catwalks shall be provided at 3rd and 4th levels of mechanical car stackers, semi-automated parking systems, and carousel systems. Catwalks must have a fixed ladder at each end of the Catwalk (See **Diagram 1A**). Where a catwalk does not abut a parking stall on both sides the catwalks must be provided with guardrails at 42" and 21" on the open side.
- *E-Stop* - A safety mechanism used to shut-off a device or equipment in an emergency situation in which the device cannot be shut down in the usual manner.

Fire Department Access Aisles: (See Diagram 1B and 2B)

- *Main Aisle* – An unobstructed way of egress in front of a mechanical car stacker, semi-automated system, carousel system, or pit system. The main aisle is used as a drive aisle for attendants to load and unload vehicles. A main aisle must have a minimum clearance per **Table 1A** between vehicle envelopes and a maximum length of a 150' for outdoor installation and 100' for indoor installations.
- *Side Aisle* – An unobstructed secondary way transecting the main aisle. A side aisle must have a minimum clearance per **Table 1A**. Side aisle may be reduced to 3'-0" if not separating other car stacker piles.
- *Access Aisle* – An unobstructed secondary way required in front of or behind tandem parking to provide fire department access to the back row.



FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT # 74

- *Fire Lane* – A roadway which is required to provide access for fire department apparatus and conforms to all requirements of Los Angeles Fire Code (LAFD), Chapter 5.
- *Loading Bay* – Typically located at the ground floor of automated parking systems, loading bays are equivalent to a 1½ car garage where the driver leaves their vehicle in an automated parking system. The loading bay is equipped with sensors to measure the vehicle and verify that loading bay is unoccupied prior to activating the automated parking system.
- *Mechanical Car Stacker* – Mechanical equipment consisting of an open steel structure that supports one, two, or three movable platforms for the stacking of vehicles vertically. A trained operator operates the equipment. Stackers may be installed as a single unit or in an array of units sharing common supports between units. A suspended platform type system may also be hung from the ceiling of a structure. Mechanical car stackers are either hydraulic or electric and can be installed indoors or outdoors. Mechanical car stackers are a dependent access system.
- *Parking Storage Area* – An area of a site or building where mechanical or automated parking systems are to be used, including the area of the equipment and the fire department access aisles. Car stacker piles within a parking storage area must be separated by main aisles, shuttle ways, side aisles, fire separation walls, or occupancy separations.
- *Pit Systems* – A pit system is an in-ground multi-level stacker consisting of an open steel structure for storing of cars below grade. The device lowers vehicles on fixed platforms up to three levels into a concealed pit so that additional cars can be parked above. Pit systems can be either an independent or dependent access system depending on vertical clearance for indoor installations. Pit systems must provide an access aisle in the pit with a minimum 18" anti-crush space located under the lower platform to prevent injury to maintenance personnel. Hydrogen vehicles are prohibited below grade.
- *Platform* – A solid steel platform that is typically suspended from a steel support structure by cables or chains and used to store vehicles vertically. Maximum height from ground floor to finish floor of the top platform shall not exceed 25'-0".
- *Semi-Automated or Puzzle Parking Systems* – Mechanical equipment consisting of a multi-level open steel structure that supports an array of

suspended platforms 2, 3, or 4 levels high vertically and horizontally. The top row of platforms moves vertically while other rows move horizontally right or left one space and move vertically. Lower rows have one open space in the array. The system will automatically shuffle the spaces horizontally to allow an upper platform to lower to grade. Semi-automated parking systems can be combined with pit systems. A trained operator operates the equipment. Semi-automated systems are typically installed in an array of units sharing common supports between units. Semi-automated systems are either hydraulic or electric and can be installed indoors or outdoors.

- *Shuttle Ways* – Common pathways in automated parking systems used for moving stored vehicles. In parking storage areas, shuttle ways must have a solid metal or heavy gauge screen catwalk capable of providing fall protection and a means of egress on every level. For automated rack and rail systems where public occupancy is prohibited, the minimum width of shuttle ways shall be equal to the width of the vehicle envelopes (See **Diagrams 2A-2D**).
- *Tandem Parking* – Tandem parking in parking storage areas shall be limited to two rows of parking, one behind the other.

EXCEPTION: Additional rows of tandem parking may be approved by the fire department with additional requirements for fire department access aisles and fire sprinklers (on a case by case submittal).

- *Vehicle Envelope* – The length and width dimensions of a vehicle allowed to park on a platform. The vehicle envelope may not extend beyond the length of the suspended equipment platform. The minimum vehicle envelope shall be 8' x 15'. The back row of tandem mechanical parking shall have a minimum vehicle envelope of 8' x 18'.
- *Vertical Reciprocating Conveyors* – Vertical lifts used in automated parking systems to transfer vehicles between floors and multi-tiered open storage racks in a parking storage area. VRCs are designed as storage and retrieval machines and shall remain unoccupied when in motion.

Fire Department Access - Aisle Requirements:

Table 1A

Car Stackers	Main Aisle	Side Aisle	Access Aisle
2- high	12'-0"	4'-0"	36" Clr*
3- high	18'-0" *	7'-0" *	36" Clr*
4- high	20'-0" *	8'-0" *	36" Clr*

- All aisle dimensions are measured from the vehicle envelope or equipment, whichever is greater.



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Fire Department Site Access:

1. Any person owning or having control of any facility, structure, group of structures or premises using a mechanical or automated parking system shall maintain fire department access in accordance with LAFC, Chapter 5 and Appendix D.
2. Parking storage area must be in compliance with LAFC, 503.1.1.

Access: In addition, to 503.1.1, access road shall be within 150' of building entrance.

503.1.1 Buildings and facilities. "Approved fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150' (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility."

3. Where access is required for fire department apparatus, overhead clearance shall be no less than 14' and open to the sky.

Fire Department Equipment Accessibility: Outdoor

1. For mechanical car stackers, semi-automated systems, carousel systems, or pit systems each platform must be directly accessible from a main aisle, fire lane, access aisle or side aisle.
2. Projects using tandem mechanical parking must provide access to the back row of platforms via side aisles and catwalks. Engine compartment must face main aisle or access aisle.

EXCEPTION: Two level tandem mechanical parking installations do not require catwalks, but must maintain minimum vehicle envelope requirements. Only one 3'-0" access aisle is required to the back row of tandem parking.

3. For mechanical car stackers, semi-automated systems, carousel systems, or pit systems architectural screening that prevents direct access from a main aisle or fire lane must provide a catwalk.

4. If any portion of the parking storage area is more than 150' from the edge of the roadway of an approved street, an approved fire lane shall be provided so that such portion is within 150' of the edge of the fire lane.
5. Side aisles for car stacker piles shall be provided at property lines. Where car stacker piles are not impeded at the property line, side aisle measurement may be taken to centerline of street, alley, or public way.

EXCEPTIONS:

- a. A single row of two-level mechanical car stackers shall not be required to provide an access aisle or side aisle separation from property lines, streets, alleys, or public ways.
 - b. When fire sprinklers are provided the required separation to adjoining properties, streets, alleys or public ways may be reduced upon fire department review and approval.
6. Two-level car stacker piles shall be located a minimum of 10' from property lines and from exterior walls of buildings of less than one-hour fire resistive construction. Three or more level car stacker piles shall be located a minimum 15' from property lines and from exterior walls of buildings of less than 2-hour fire resistive construction. All openings in rated exterior walls shall be protected as required by code.

EXCEPTIONS:

- a. A 3-hour fire resistive Concrete Masonry Unit (CMU) wall may be provided to reduce the setback from adjacent property lines.
- b. Setback not required at property lines abutting a street, alley, or public way.

Accessibility: Indoor

1. Indoor installations of mechanical or automated parking systems must meet outdoor requirements 1 through 3.
2. Standpipe outlets shall be provided in enclosed rated stairways. Where the most remote portion of a floor or story is more than 150' from a hose connection, the fire code official is authorized to require that additional hose connections be provided in approved locations. The distance from a hose connection shall be measured along the path of travel.
3. Buildings with indoor parking storage areas must be fully sprinklered per NFPA 13. Partial fire sprinklers are not allowed. Reduction in clearance requires review and approval by the fire department.



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EXCEPTION: Non-sprinklered private garages with four or less vehicles (not including pit systems).

4. Indoor parking storage areas must provide two exits with a maximum travel distance limited to 250' in addition to Los Angeles Building Code (LABC), Chapter 10 Requirements.
5. Structures housing mechanical or automated parking systems shall be classified as S-2 occupancy.
6. Allowable building heights and area shall be limited per **Table 503** for S-2 occupancy requirements for open or enclosed parking structures. Allowable area shall be calculated using the sum of each tier of the parking storage area.
7. Parking storage areas and loading bay shall be separated from other uses by a 2- hour fire barrier.
8. A smoke exhaust system designed to provide a minimum of six air changes per hour shall be provided for indoor parking areas with two or more car stacker piles. The smoke exhaust system shall meet all requirements in LAFD/LABC, Section 909 in regards to activation, power supplies, smoke supplies, smoke control panels and equipment status.

A certificate air balance and deputy smoke control inspection report shall be provided to LAFD and Los Angeles Department of Building and Safety (LADBS) mechanical inspection prior to scheduling a performance test for the system.

9. Parking storage areas shall provide a drainage system in accordance with the California Plumbing Code (CPC). The drainage system shall be sized to carry the volume of the fire protection water.

Equipment Requirements:

1. Each suspended platform in a mechanical or puzzle parking automated parking system must be equipped with anti-fall devices.
2. Pit systems must provide a full height barrier to prevent falling into the pit when the system is in motion.
3. Parking storage area must have a key access box located at the primary entry.

4. Portable fire extinguishers shall be provided, installed, and distributed in parking storage areas to meet 2017 LAFC/California Fire Code (CFC), Table 906.3(2) due to concentrated vehicle storage containing flammable liquids.
5. Access to sprinkler valves, standpipes, and other fire protection equipment provided in parking storage areas shall be served by either a main aisle or side aisle.
6. Aisles shall be kept free from parked vehicles at all times, except for the temporary shuffling of vehicles between levels. No vehicles shall be parked in a side aisle.
7. Emergency shut down and e-stops. Parking storage areas must be equipped with e-stops and power-disconnect switches as follows:
 - a. All emergency shut down switches and e-stop switches shall be clearly identified and shall be in a location approved by the fire department.
 - b. Mechanical car stackers shall be equipped with an on/off keyed switch and operation shall be through a dead-man-type push button station. Each hydraulic power unit shall have a power disconnect switch within 10' of the unit.
 - c. Pit systems shall be equipped with an e-stop located within 10' of the operating device. Each hydraulic power unit or main control panel must have a power disconnect switch within 10' of the unit. An e-stop shall be located in any access or service areas in the pit.
 - d. Automated rack and rail and AGV systems: Automated and semi-automated parking systems shall be equipped with an e-stop at each operator station where applicable. Each main control panel controlling the electric motors or hydraulic power unit shall have an integrated power disconnect or power disconnect switch within 10' of the unit.
 - e. Automated parking systems must be equipped with e-stops throughout the parking storage area and loading bays. E-stops shall be located at points of entry to the parking storage area, or evenly distributed throughout the parking storage area at a minimum of 75' intervals. Each loading bay shall be equipped with a minimum of (2) two e-stops. Loading bay e-stops may consist of door contactors that shut down the equipment when the door is open, or may be located in a locked enclosure accessible to the fire department. A power disconnect switch shall be provided at the automated systems main control panels, VRC, shuttles, power rails, conveyor systems, AGV charging stations and any other equipment within the system.



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Location of power disconnects shall comply with the electrical code requirements.

- f. Automated parking shall shut down upon fire alarm and sprinkler activation and shall be provided with manual shut down at access points in automated parking areas.
- g. Hydraulic power units shall be installed in a one hour rated room. The room shall have secondary spill containment and the access door shall be properly placarded.
- h. Visual warning devices at automated parking access points/entry portals must be activated upon re-starting of equipment. Installation shall comply with the following requirements:
 - Visual warning devices cannot be integrated with fire alarm devices. Non-fire alarm equipment must be on its own system.
 - Visual warning devices shall have different tones/lights from fire alarm devices.
 - Visual warning devices shall be located within 10' of any access points/entry portals.
 - Visual warning devices shall be provided no more than 50 lineal feet apart down the center of the main aisles.
 - Visual warning devices shall be on standby power.
- 8. Occupancy Sensors: Automated parking systems shall provide a means of sensing occupancy in the loading bays and at each entrance into the parking storage area. Sensors shall prevent the unauthorized access into the system. Activation of the occupancy sensors shall stop or prevent activation of the system.
- 9. Warning Signs/Labels/Placards: Approved warning signs indicating the danger involved and necessary precautions shall be posted on all doors and entrances to the premises. Parking storage area shall have approved warning signs on equipment indicating hazards such as danger high voltage, caution low head clearance, hazardous materials, and other dangers. Obstructions below 6'-6" or protruding more than 4" into a fire department access aisle shall be clearly

marked with signage and shall be marked with contrasting yellow and luminous material with alternating bands.

10. Exit path of travel/LAFD access walkways that are clear of moving vehicles shall be marked with yellow reflective paint.
11. Fire Alarm System:
 - a. Visual notification devices shall be provided along the catwalks, driveways, and mechanical equipment rooms.
 - b. Signage at Fire Alarm Control Panel (FACP) and all access points into automated area to warn all persons of automated system.
12. Two means of egress shall be provided via an enclosed and rated staircase. Provide a minimum 2-hour rated enclosure with 90-minute rated openings.
13. Manual reset of fire alarm and sprinkler activation for mechanical or automated parking must be provided at the fire alarm control panel fire department access point. Manual re-start of automated parking equipment shall be prevented until after manual reset of fire alarm and sprinkler.
14. Emergency lighting shall be provided throughout automated parking/equipment locations.
 - a. Provided 1' candela e-lighting throughout for operational purposes.
15. Path of travel/LAFD walkways must be provided with raised border or post to protect and keep hose lines out of automated equipment movement area.
16. Automated parking equipment shall require manual re-start after fire alarm activation to prevent persons from starting equipment while LAFD in area.
17. Audible warning tone required upon re-starting of parking equipment.
18. Visual warning device at automated parking access points activated upon re-starting of equipment.
19. For installations into existing buildings, the water storage tank must be sized for Hazard Class II, if applicable.
20. Fusible links for fire door release shall be installed per NFPA 80.
21. Installation of mechanical or automated parking system shall comply with the applicable provisions of LADBS' Building, Electrical, Mechanical, Plumbing, and LAFD's Fire Codes. Please reference [LADBS Information Bulletin P/ZC 2002-001](#).



Revised/Date: July 24, 2020

FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT # 74

Any questions regarding this requirement should be directed to the Research Unit at (213) 978-3580. To ensure all members have a clear understanding of this requirement, Commanding Officers shall review this FPB Requirement #74 with all members in their command.

Approved By:

Kristin M. Crowley, Deputy Chief
Fire Prevention and Public Safety Bureau

7-24-20

Date

EXHIBIT 5



Office of the Fire Marshal

200 N. Main Street, Room 1770

Telephone: 213-978-3570

LOS ANGELES FIRE DEPARTMENT REQUIREMENT NO. 10

EMERGENCY HELICOPTER LANDING FACILITIES (EHLF) REQUIREMENTS

An Emergency Helicopter Landing Facility (EHLF) is required for High Rise Buildings per LAMC Section 57.4705.4. Every high-rise building shall have an approved emergency helicopter landing facility (EHLF) on the roof adjacent to or above the highest habitable level. **Exception** - If specific life safety features are provided as outlined below in Option 1 and 2 in LAFD Requirement No. 10, the EHLF is not required. A private use, state permitted helistop or heliport designed according to Los Angeles City Fire Department Standard No. 54 may substitute for an EHLF provided it meets the design requirements for the largest helicopter in the LAFD Air Operation's fleet at the time of design approval.

GENERAL

These requirements provide guidelines for the EHLF design and for the substitution of a Helicopter Tactical Landing Area (HTLA) (Option 1), or no rooftop helicopter landing facility (Option 2) in lieu of the load bearing emergency helicopter landing facility (EHLF).

DEFINITIONS

Approach-Departure Path – The flight track helicopters follow when landing or departing an emergency helicopter landing facility.

Emergency Helicopter Landing Facility (EHLF) – A clear area at ground level or on the roof of a building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations.

Helicopter Tactical Landing Area (HTLA) – Option 1 – A designated load bearing area with dimensions that will be less than those required for the load bearing area of an EHLF but with sufficient safety area around the HTLA to provide clearance for the helicopter.

Maximum Operating Weight (MOW) – The maximum operating weight for the heaviest helicopter in the LAFD fleet is 15,000 lbs.

Safety Area – Contains the Touchdown and Liftoff area (TLOF) area plus a factor of safety. It is a defined, obstruction free area over which the pilot completes the final phase of the approach to a hover or a landing and from which the pilot initiates takeoff.

Touchdown and Liftoff area (TLOF) – A load-bearing, non-combustible area, centered in the Safety Area on which the helicopter lands or takes off.

A. **EMERGENCY HELICOPTER LANDING FACILITY (EHLF)**

The design of the emergency helicopter landing facility shall comply with the requirements of this guideline and be constructed in accordance with the Los Angeles City Building Code and Title 24 of the California Code of Regulations. An EHLF is required for High-Rise Buildings per LAFC Section 57.4705.4.

NOTIFICATION

1. **FEDERAL AVIATION ADMINISTRATION (FAA)** – The EHLF is not intended to operate as a private use helistop or heliport. Therefore, no notice for an airspace evaluation (FAA 7480) needs to be filed with the FAA.

PERMITS

An emergency helicopter landing facility is exempt from Caltrans Division of Aeronautics heliport permitting requirements in accordance with Division of Aeronautics – Caltrans – Title 21 CCR 3533 (b)(8) provided it is not used for any purpose other than as an emergency use facility.

DESIGN

1. **Size:** The TLOF shall be a square (50 ft x 50 ft) or circle with a 50 ft. inside diameter. (See Figure 1)
2. **Safety Area:** This area is a horizontal plane at the same elevation as the TLOF and shall extend out 25 ft. in all directions from the edge of the TLOF. No object shall penetrate above that imaginary horizontal plane.
3. **Approach-Departure Paths:** The emergency helicopter landing facility shall have two approach-departure paths separated in plan view from each other by at least 90 degrees. No objects shall penetrate above the approach-departure paths. The approach-departure flight path is a rising slope that begins at the edge of the TLOF with the same width or diameter as the TLOF. As it extends away from the TLOF, the flight path rises upward at a ratio of 8 ft horizontal distance to 1 ft. vertical height. (See Figure 2)
4. **Weight:** The TLOF shall be of non-combustible construction and shall support a maximum weight of 15,000 pounds in accordance with the provisions set forth in 2013 California Building Code Section 1607.6.
5. **Drainage:** Provisions shall be made to drain flammable liquid spillage away from any exit or stairway serving the landing area. A clarifier tank is not required. The slope of the TLOF shall be between 0.5 percent to 2 percent in any direction.
6. **Surface:** The TLOF shall have a skid-resistant surface for helicopters and a non-slippery surface for people.

7. **Safety Net:** TLOF's elevated more than 30 inches above the adjacent roof surface shall be provided with fall protection in the form of a safety net not less than 6 ft. wide. Such nets shall have load capability of 25 pounds per square foot and shall be constructed of materials resistant to environmental effects. The inner edge of the safety net shall drop down no greater than 1 ft. from the edge of the TLOF and the outer edge of the safety net shall slope up but not extend above the elevation of the TLOF.

FIRE PROTECTION

1. **Fire Hose Cabinets:** Two hose cabinets shall be provided with 100 ft. rubber-lined single jacketed 1½ inch fire hose equipped with a fog nozzle. They may be located at the intermediate stair landing or at the bottom of the EHLF stairs. A residual pressure of 80 psi at the nozzle while flowing 90 GPM shall be provided to achieve an acceptable fog pattern.

MEANS OF EGRESS

1. **Number of exits:** Each EHLF shall have not less than two means of egress from the TLOF in accordance with the 2013 California Building Code. At least one exit shall be a stairway. When the exit stairs are located within the safety area, stair handrails shall not extend above the elevation of the TLOF. However, adequate fall-off protection shall be provided through devices such as a safety net.
2. **Separation of exits:** Such egress points shall be separated a minimum of 75 ft. along the perimeter of the TLOF.

MARKINGS

1. **TLOF:** Define the limits of the Touchdown and Liftoff area with a solid 1 ft. wide red line. (See Figure 1)
2. **Weight Capacity:** In a circle in the middle of the TLOF, identify the maximum weight of the design helicopter, in units of thousands of pounds. The minimum helicopter weight is 15,000 pounds which is indicated by the number "15" in the middle of the TLOF. The weight numeral shall be 10 ft. in height with a minimum 1 ft. stroke; and the numeral shall be oriented on the axis of the preferred path of approach and departure, preferably toward the prevailing wind. (See Figure 1)

WIND CONE

Locate a lighted wind cone assembly that complies with the requirements of FAA Advisory Circular 150/5345-27E within the line of sight from the EHLF but outside the safety area and below the flight paths.

LIGHTING

Shield any ambient lighting to avoid affecting the pilot's vision.

B. REQUIREMENTS FOR ELIMINATION OF EHLF BASED ON BUILDING HEIGHT:

The following HTLA Option1 and the NO-EHLF or NO-HTLA Option 2 are both proposed in order to eliminate the use of the EHLF. These exemptions may be obtained through an alternate means of compliance when the following additional life safety features are provided and approved by the Fire Marshal.

I. OPTION 1 EHLF EQUIVALENCY- HELICOPTER TACTICAL LANDING AREA (HTLA)

APPROVALS

The HTLA design, if approved by the Fire Marshal, and reviewed by Helicopter Air Support Unit, may be substituted for an EHLF.

NOTIFICATION

FEDERAL AVIATION ADMINISTRATION (FAA) – The HTLA or No-EHLF is not intended to operate as a helistop or heliport for private use landings. Therefore no notice for an airspace evaluation (FAA 7480) needs to be filed with the FAA.

PERMITS

The HTLA is exempt from Caltrans Division of Aeronautics heliport permitting provided it is not used for any purpose other than an emergency use facility.

1. For High Rise Buildings over 75 feet, but less than 120 feet, an EHLF is not required if the following are provided:

- A. A Fire Service Elevator as per 2013 California Building Code Sections 403.6 and Section 3007.
- B. Two (2) stairways all with roof access. Access to the roof shall be provided through a penthouse complying with the 2014 LABC Section 91.1509.2.
- C. Enclosed elevator lobbies shall be provided in accordance with the LAFC Section 57.4705.1.
- D. Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor. All automatic shutters shall conform to 2014 LABC Section 91.712.1.3.2.

2. **For High Rise Buildings over 120 feet, but less than 240 feet, provide the following:**
 - A. A LAFD approved Helicopter Tactical Landing Area. (See Exception “EHLF Equivalency – Option 2” below).
 - B. Provide Two (2) Fire Service Access Elevators as required in the 2013 California Building Code 403.6.1.
 - C. Two (2) stairways all with roof access. Access to the roof shall be provided through a penthouse complying with the 2014 LABC Section 91.1509.2.
 - D. Enclosed elevator lobbies shall be provided in accordance with the 2014 LAFC Section 57.4705.1.
 - E. Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor. All automatic shutters shall conform to 2014 LABC Section 91.712.1.3.2.
3. **For High Rise Buildings 240 feet and over, but less than 420 feet, provide the following:**
 - A. A LAFD approved HTLA. (See Exception “EHLF Equivalency – Option 2” below)
 - B. Provide Two (2) Fire Service Access Elevators as required in the 2013 California Building Code 403.6.1.
 - C. Two (2) stairways (and a third if added) shall have roof access. Access to the roof shall be provided through a penthouse complying with the 2014 LABC Section 91.1509.2.
 - D. Enclosed elevator lobbies shall be provided in accordance with the LAFC Section 57.4705.1.
 - E. Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor. All automatic shutters shall conform to 2014 LABC Section 91.712.1.3.2.

4. **For High Rise Buildings 420 feet and over, but less than 1000 feet, provide the following:**
- A. A LAFD approved HTLA. (See Exception “EHLF Equivalency – Option 2” below)
 - B. Provide Two Fire Service Access Elevators as required in the 2013 California Building Code 403.6.1.
 - C. Two (2) stairways (and a third if added) shall have roof access. Access to the roof shall be provided through a penthouse complying with the 2014 LABC Section 91.1509.2.
 - D. Enclosed elevator lobbies shall be provided in accordance with the LAFC Section 57.4705.1.
 - E. Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor. All automatic shutters shall conform to 2014 LABC Section 91.712.1.3.2.

II. OPTION 2 EHLF EQUIVALENCY: NO – EHLF AND NO – HTLA-

When all applicable life safety elements in “**Option 1- EHLF Equivalency – HTLA**” have been provided, an exception to the EHLF and HTLA may be obtained through an alternate means of compliance, and defined as “**Option 2 EHLF Equivalency,**” if the following additional life safety features are included and approved by the Fire Marshal.

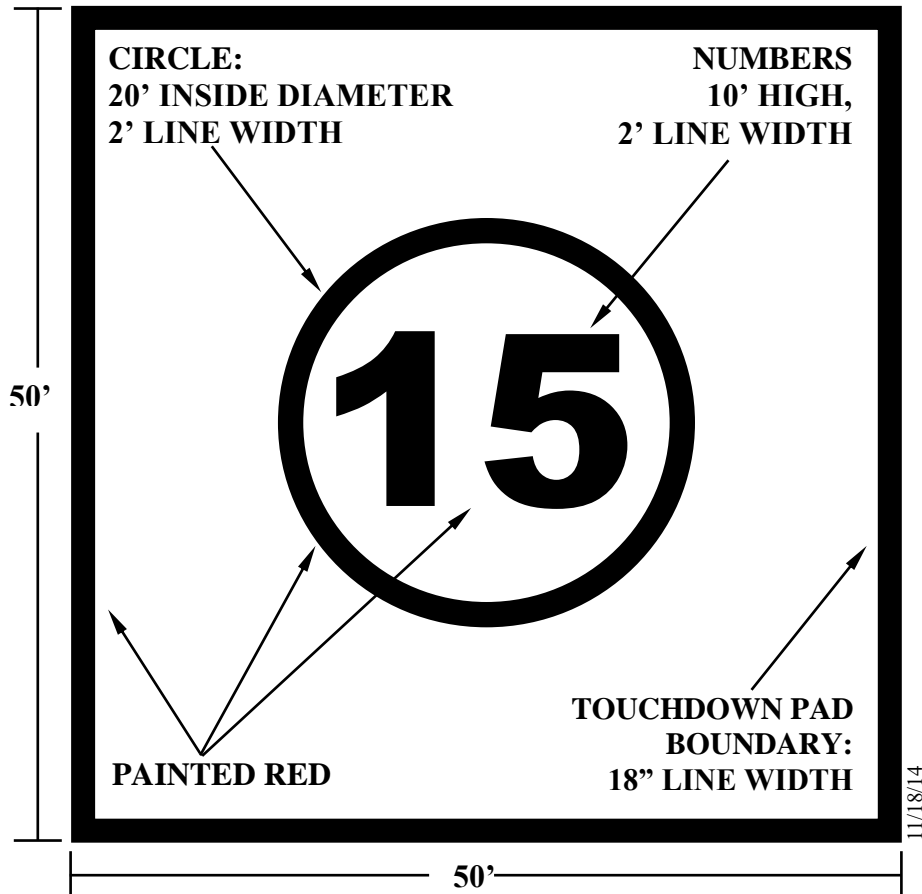
- 1. Provide an automatic sprinkler system installed throughout the High Rise building, designed in accordance with Sections 57.903.3.1 of the LAFC. In light and ordinary hazard areas, other than parking garages, listed quick-response sprinklers, including extended coverage quick-response sprinklers, shall be used throughout the system. The NFPA 13 reduction to the hydraulic design area of operation for quick-response sprinkler systems shall NOT be permitted. **Note:** To meet the intent of this life safety feature it will typically require larger size branch lines for the automatic sprinkler system with quick response sprinkler heads.

2. Provide a Video Camera Surveillance System with cameras located in all Fire Service Access Elevator Lobbies and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft. Fire Department video surveillance shall be usable from the Fire Department's "fire control room" and installed with system cabling "survivability" requirements similar to NFPA Standard 72 for fire alarm systems. System cameras are required to be active during a fire alarm condition within the building.
3. Additionally, High Rise Buildings over 420 ft. in height will provide egress stairways with a capacity, in inch's, calculated by multiplying the occupant load served by a means of egress capacity factor of 0.3 inches per person. However, the capacity shall not be less than specified elsewhere in the building and fire codes.

See Attached - Emergency Helicopter Landing Facility Table – Figure 3

FIGURE 1

**MARKINGS UTILIZING A SQUARE FOR A ROOF-TOP
EMERGENCY HELICOPTER LANDING FACILITY.
(Amended by Ord. No. 167,326, Eff. 11/16/91.)**

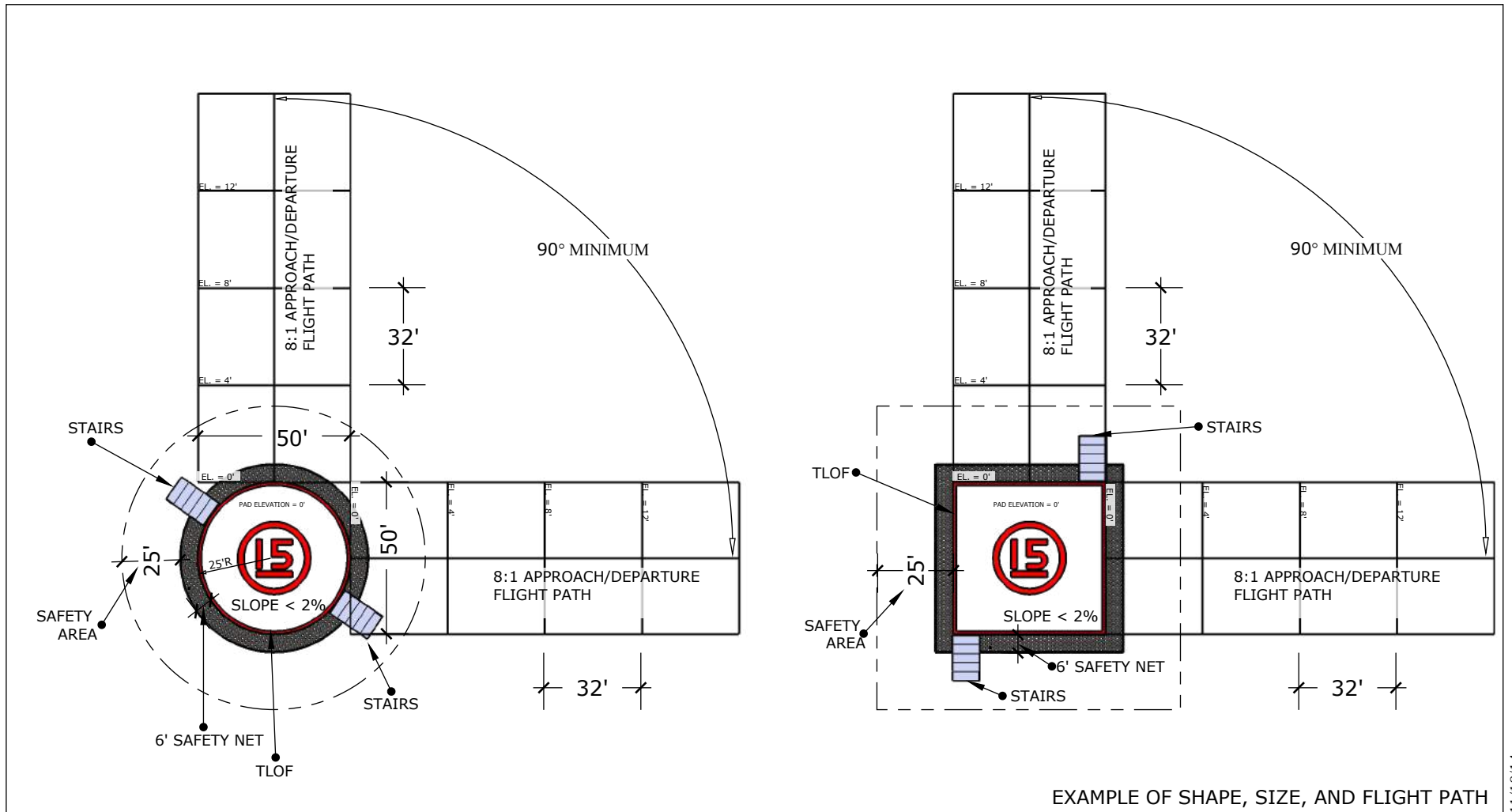


Notes:

1. The preferred touchdown pad background color is white.
2. The red numeral indicates the allowable weight, in thousands of pounds, that the facility is capable of supporting.
3. The numbers shall be oriented toward the preferred flight path (typically facing the prevailing wind).
4. Allowable weight shall not be in metric units.

LOS ANGELES CITY FIRE DEPARTMENT

EMERGENCY HELICOPTER LANDING FACILITY



11/18/14

SCALE

1" = 50'

FIGURE 2

CONCEPT PLANS

EQUIVALENCY / ALTERNATIVES to Helipad / Emergency Helicopter Landing Facilities based on building height

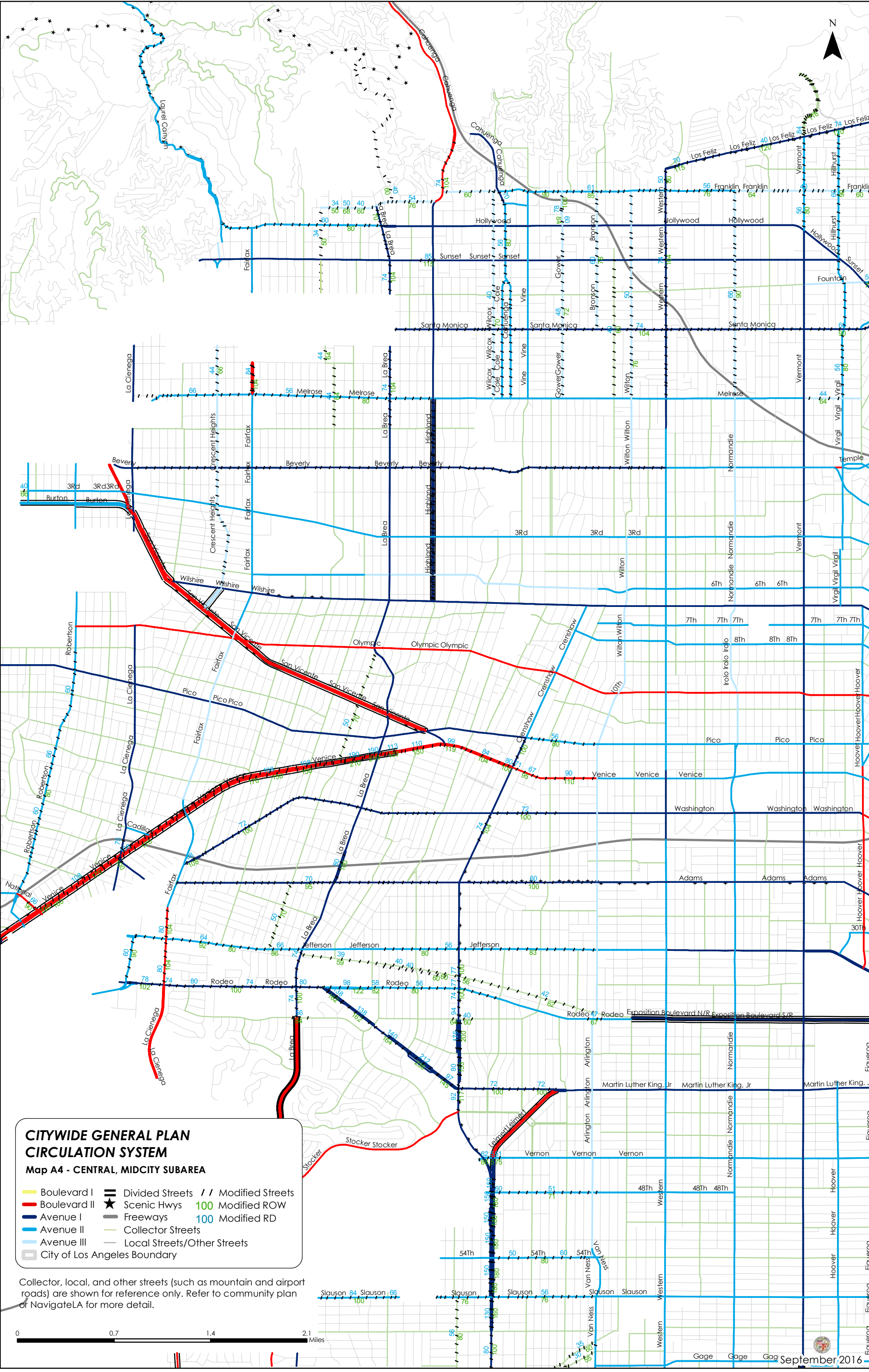
11/17/14
Figure 3

OPTION 1: Equivalency / alternatives required to implement a Helicopter Tactical Landing Area (HTLA) in lieu of a Helipad / Emergency Helicopter Landing Facility (EHLF). *(Projects must meet all indicated requirements for this category)*

OPTION 2: Equivalency / alternatives required in lieu of both Helicopter Tactical Landing Area (HTLA) and Helipad / Emergency Helicopter Landing Facility (EHLF). Neither HTLA nor EHLF would be required. *(Projects must meet all indicated requirements for this category)*

Life Safety Alternatives	Building Height			
"Option 1" alternatives	>75' ≤120'	>120' ≤240'	>240' ≤420'	>420' ≤1000'
A LAFD approved Helicopter Tactical landing Area (see separate "Option 2" alternatives below)	✗	✓	✓	✓
A fire service elevator as per 2013 CBC Sections 403.6 and 3007.	✓	✗	✗	✗
Provide Two Fire Service Access Elevators as required in the 2013 California Building Code 403.6.1.	✗	✓	✓	✓
Two (2) stairways (and a third if added) shall have roof access. Access to the roof shall be provided through a penthouse complying with the 2014 LABC Section 91.1509.2	✓	✓	✓	✓
Enclosed elevator lobbies shall be provided in accordance with the Los Angeles Fire Code (LAFC) Section 57.4705.1.	✓	✓	✓	✓
Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor. All automatic shutters shall conform to 2014 LABC Section 91.712.1.3.2	✓	✓	✓	✓
"Option 2" alternatives below must be achieved IN ADDITION to the above "Option 1" HTLA alternatives in order to eliminate both Helipad / EHLF and HTLA requirements, depending on building height				
Provide an automatic sprinkler system installed throughout the High Rise building, design in accordance with Sections 57.903.3.1 of the LAFC. In areas, other than parking garage, the design shall include quick response sprinklers with not less than two additional quick response sprinkler heads above the minimum applicable effective coverage requirements. <i>Note: To meet the intent of this life safety feature it will typically require larger size branch lines for the automatic sprinkler system with quick response sprinkler heads.</i>	✗	✓	✓	✓
Provide a Video Camera Surveillance System with cameras located in all Fire Service Access Elevator Lobbies, and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft. Fire Department video surveillance shall be usable from the Fire Command Center and installed with system cabling "survivability" requirements similar to NFPA Standard 72 for fire alarm systems. System cameras are required to be active during a fire alarm condition within the building.	✗	✓	✓	✓
Provide egress stairways with a capacity, in inches, calculated by multiplying the occupant load served by a means of egress capacity factor of 0.3 inches per person minimum. The capacity shall not be less than specified elsewhere in the building and fire codes.	✗	✗	✗	✓

EXHIBIT 6



Boulevard I

Boulevard II

Avenue I

Avenue II

Avenue III

City of Los Angeles Boundary

Divided Streets

Scenic Hwys

Freeways

Collector Streets

Local Streets/Other Streets

Modified Streets

Modified ROW

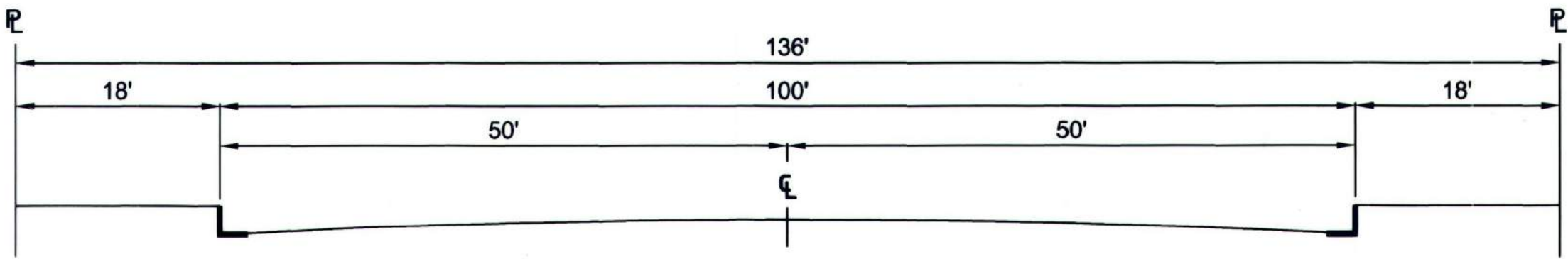
Modified RD

Collector, local, and other streets (such as mountain and airport roads) are shown for reference only. Refer to community plan or NavigateLA for more detail.

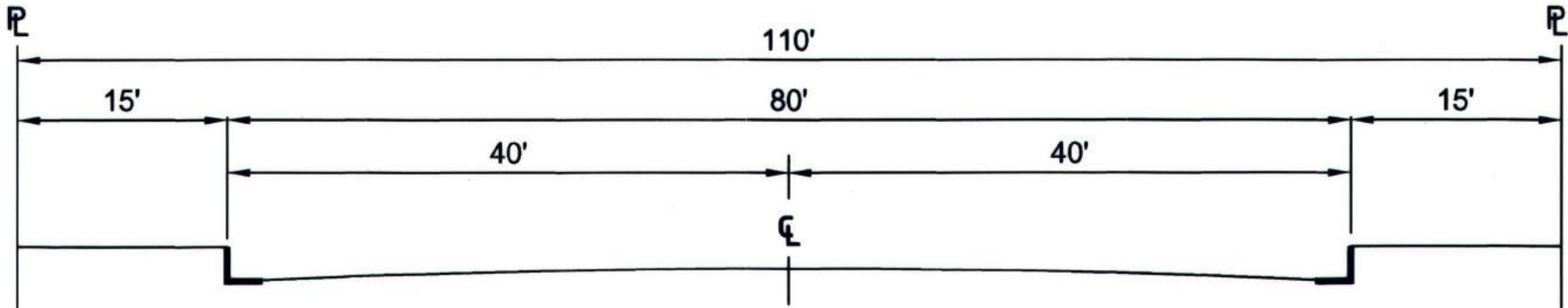
September 2016

EXHIBIT 7

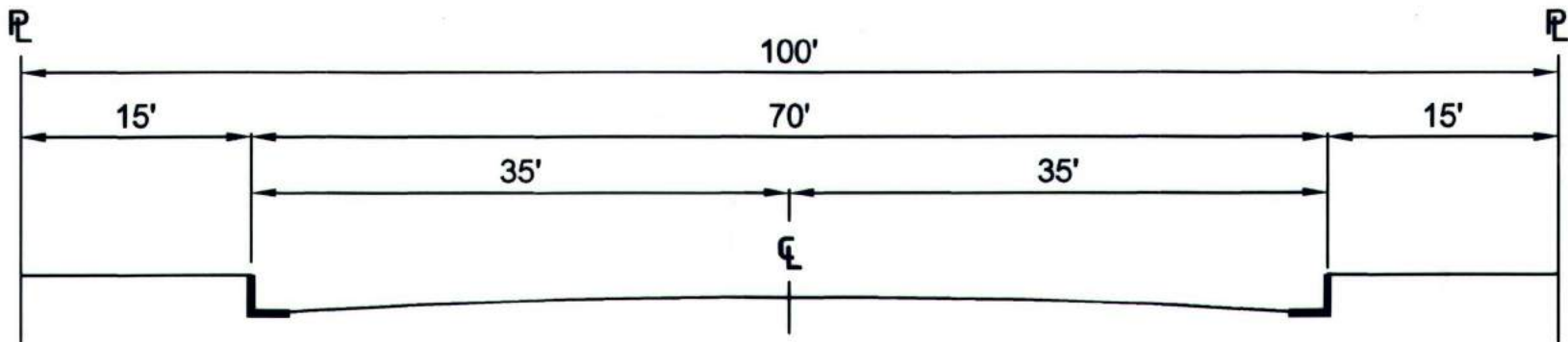
ARTERIAL STREETS



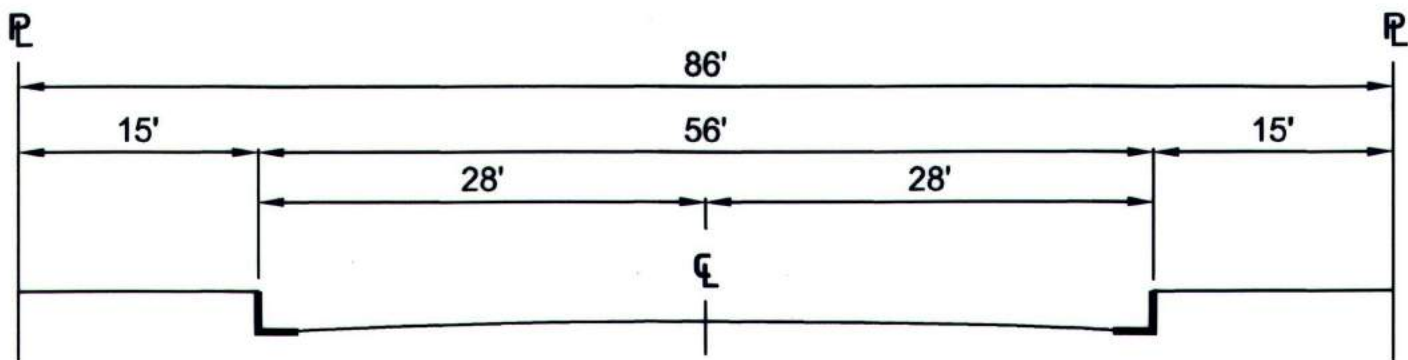
BOULEVARD I (MAJOR HIGHWAY CLASS I)



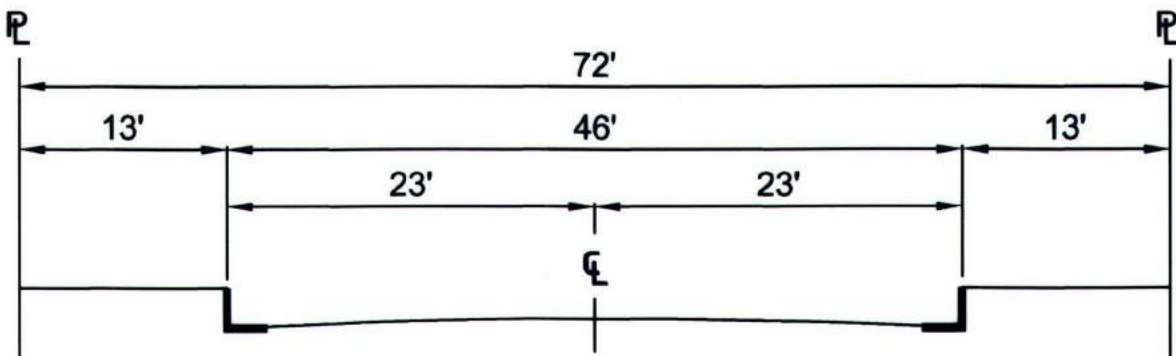
BOULEVARD II (MAJOR HIGHWAY CLASS II)



AVENUE I (SECONDARY HIGHWAY)



AVENUE II (SECONDARY HIGHWAY)



AVENUE III (SECONDARY HIGHWAY)



BUREAU OF ENGINEERING

DEPARTMENT OF PUBLIC WORKS

CITY OF LOS ANGELES

STANDARD STREET DIMENSIONS

STANDARD PLAN
S-470-1

PREPARED

KITTY SIU, P.E.
BUREAU OF ENGINEERING

CHECKED

RAFFI MASSABKI, P.E.
BUREAU OF ENGINEERING

SUBMITTED

Samara Ali-Ahmad 10/13/15
SAMARA ALI-AHMAD, P.E. DATE
ENGINEER OF DESIGN
BUREAU OF ENGINEERING

Kenneth Redd 10/13/15
KENNETH REDD, P.E. DATE
DEPUTY CITY ENGINEER

APPROVED

Gary Lee Moore 10-20-15
GARY LEE MOORE, P.E., ENV. SP. DATE
CITY ENGINEER

Michael J. DeLuca 10-21-15
DEPARTMENT OF TRANSPORTATION DATE
GENERAL MANAGER
Michael J. DeLuca 10-21-15
DIRECTOR OF PLANNING DATE



SUPERSEDES

D-22549
S-470-0

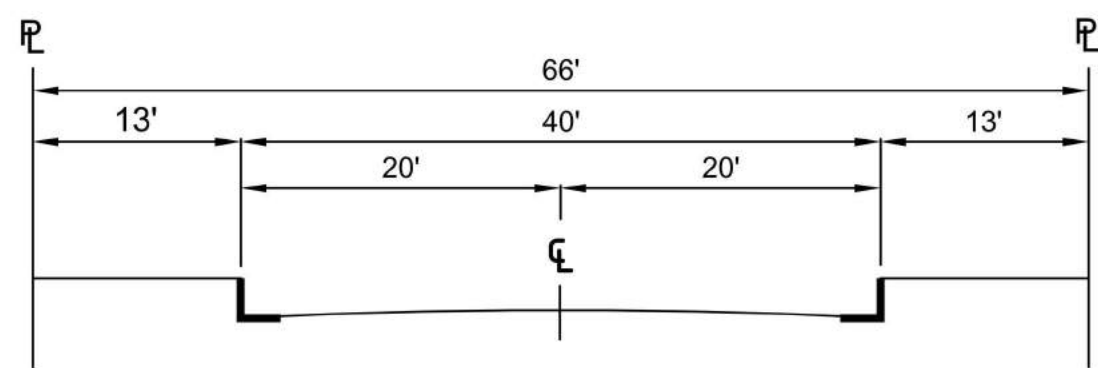
REFERENCES

VAULT INDEX NUMBER: B-4738

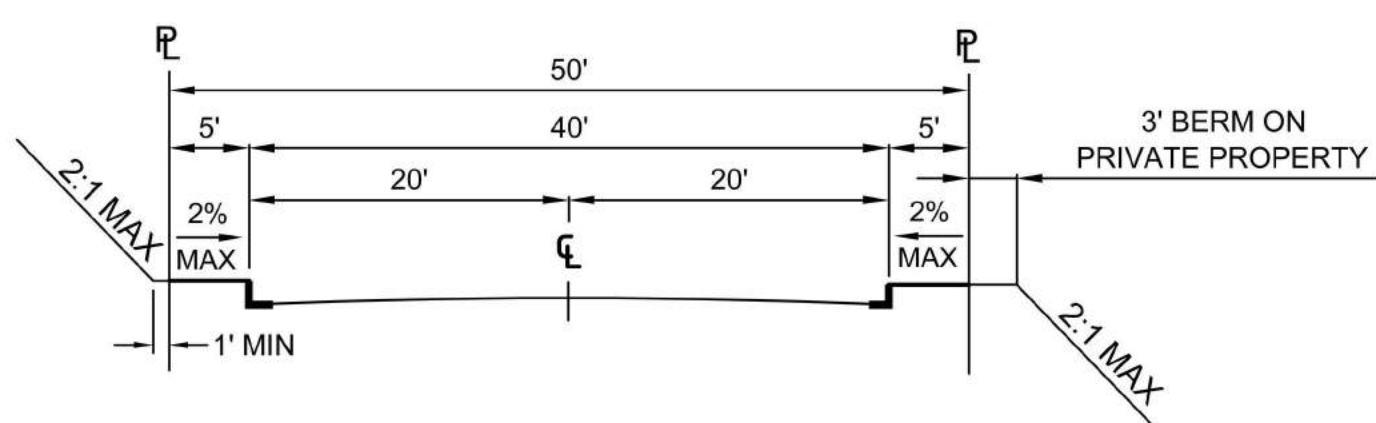
SHEET 1 OF 4 SHEETS

NON-ARTERIAL STREETS

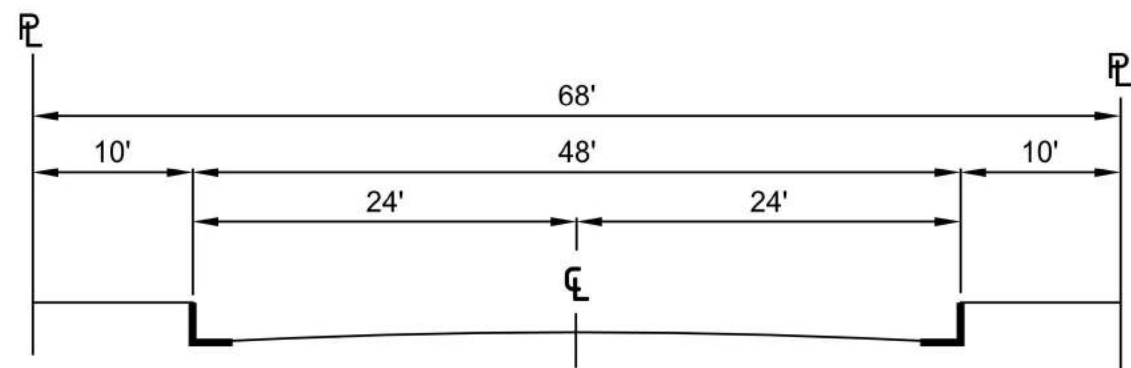
HILLSIDE STREETS



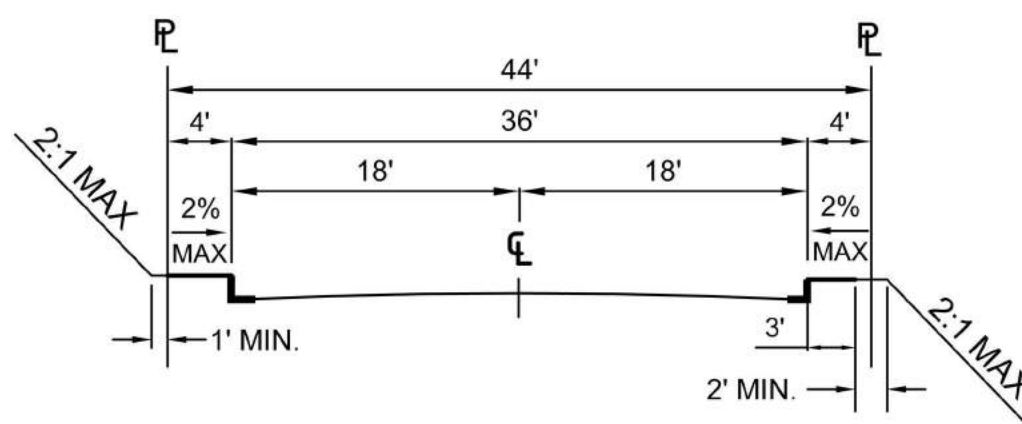
COLLECTOR STREET



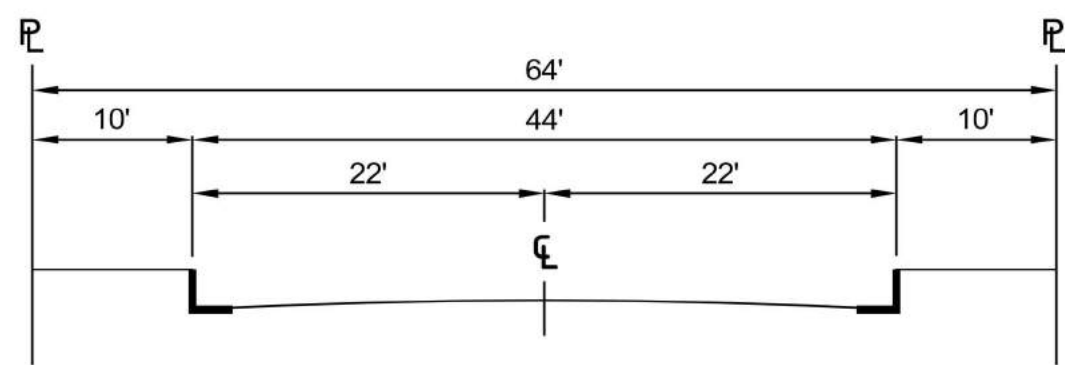
HILLSIDE COLLECTOR



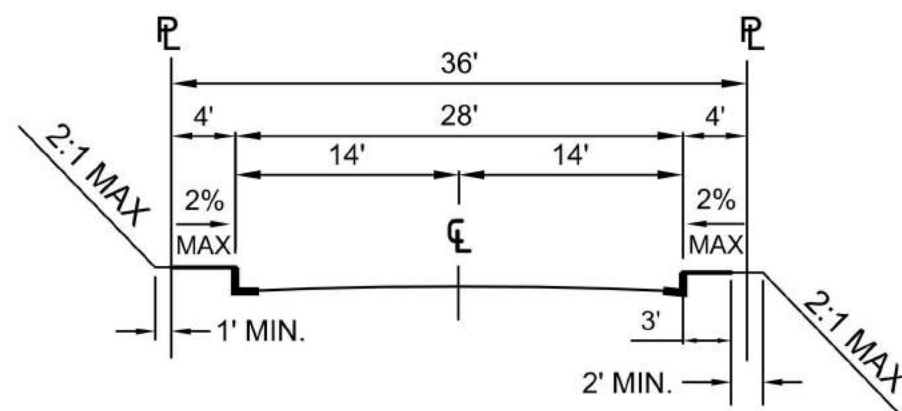
INDUSTRIAL COLLECTOR STREET



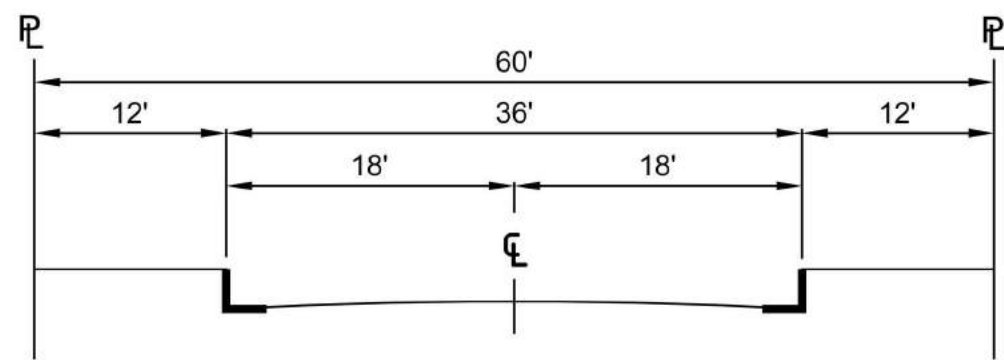
HILLSIDE LOCAL



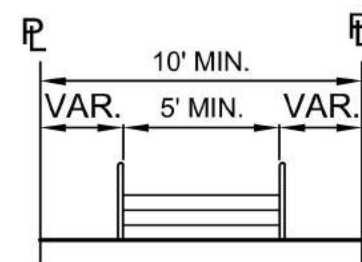
INDUSTRIAL LOCAL STREET



HILLSIDE LIMITED STANDARD

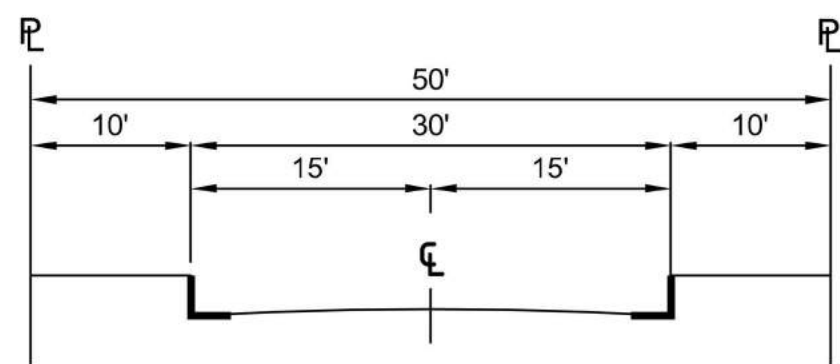


LOCAL STREET - STANDARD



PUBLIC STAIRWAY

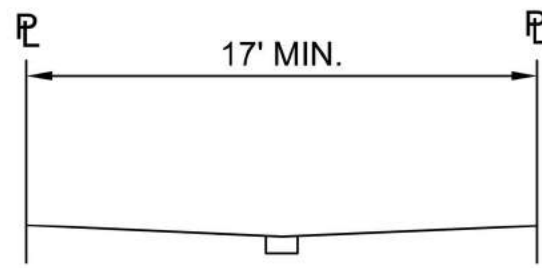
CONSTRUCTED IN ACCORDANCE WITH
BUREAU OF ENGINEERING STANDARD PLANS



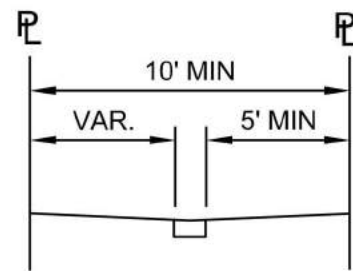
LOCAL STREET - LIMITED



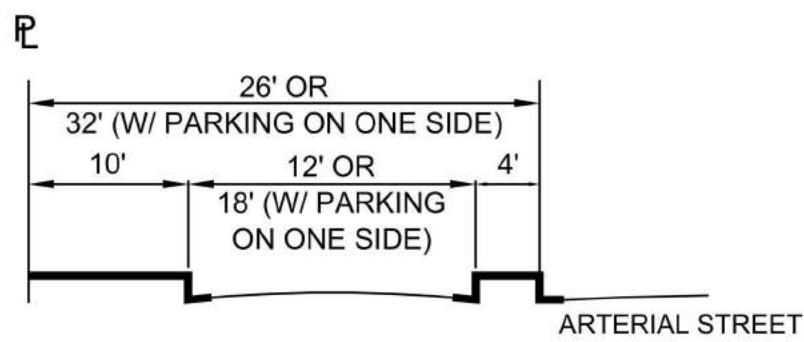
OTHER PUBLIC RIGHTS-OF-WAY



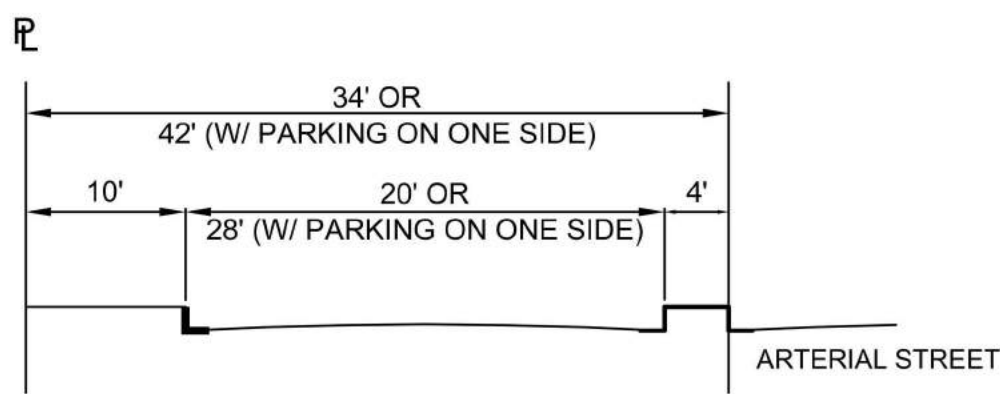
SHARED STREET



PEDESTRIAN WALKWAY

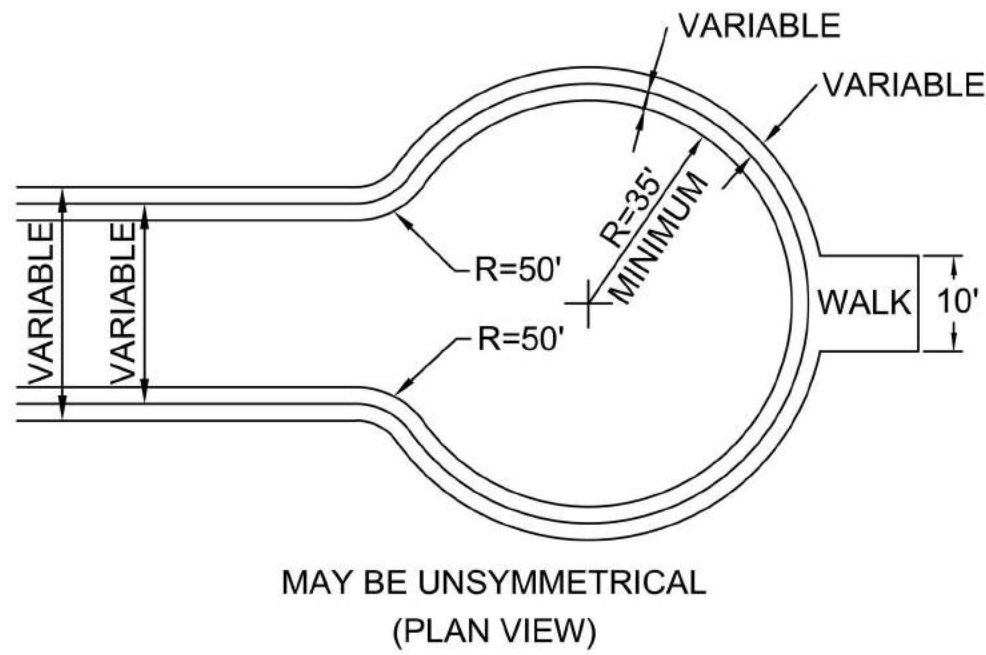


ONE-WAY SERVICE ROAD



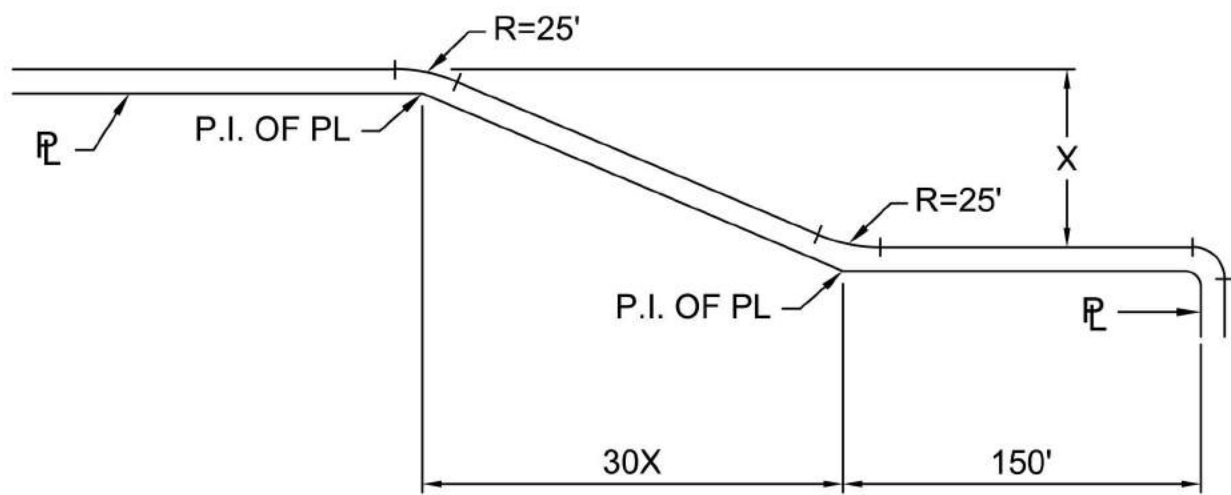
BI-DIRECTIONAL SERVICE ROAD

CUL-DE-SAC



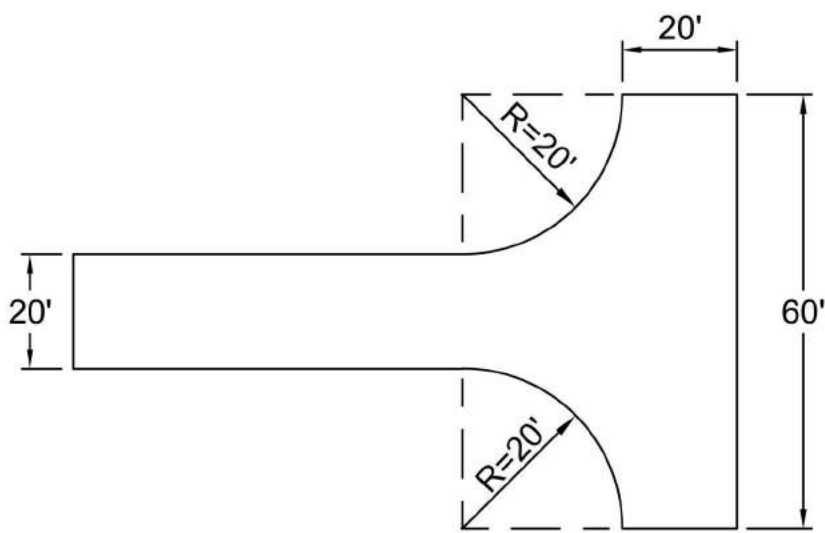
NOTE: FOR FIRE TRUCK CLEARANCE, NO OBSTRUCTION TALLER THAN 6" SHALL BE PERMITTED WITHIN 3FT. OF THE CURB. ON-STREET PARKING SHALL BE PROHIBITED.

TRANSITIONAL EXTENSIONS

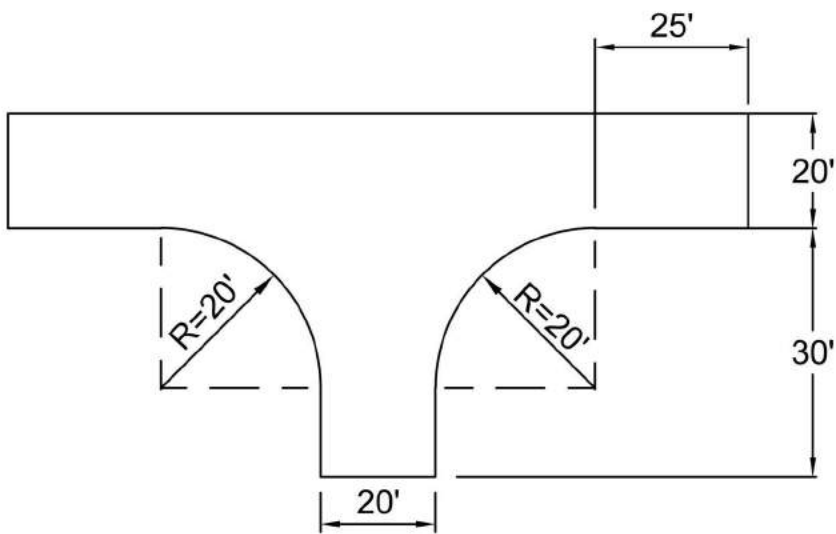


STANDARD FLARE SECTION
(PLAN VIEW)

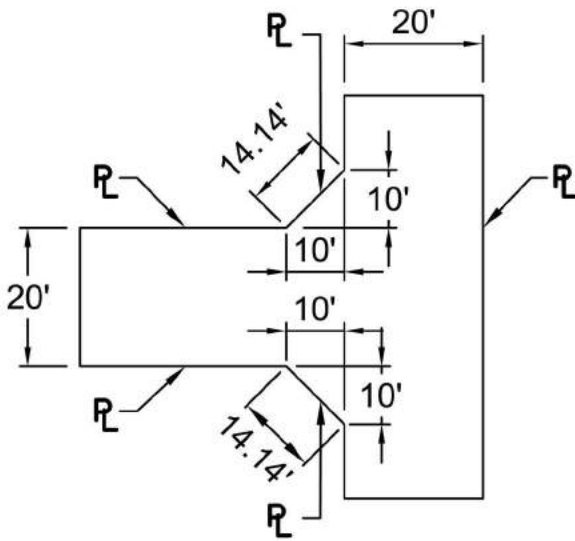
ALLEYS



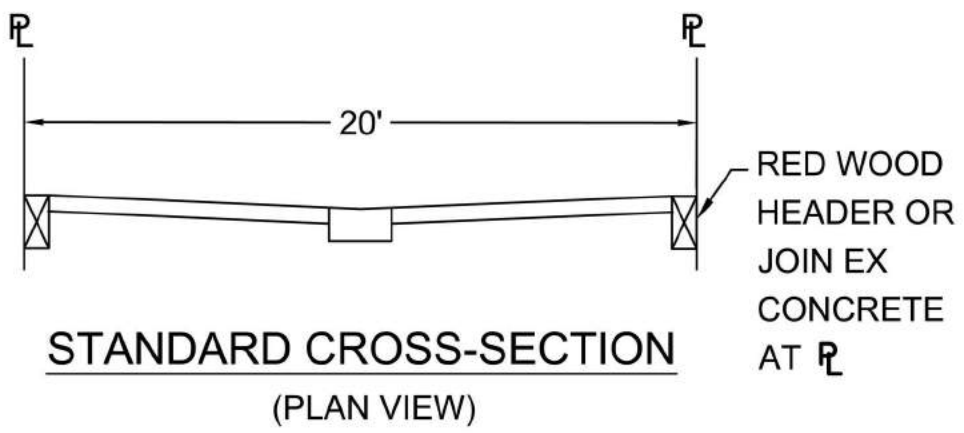
STANDARD TURNING AREA
(PLAN VIEW)



MINIMUM TURNING AREA
(PLAN VIEW)



STANDARD CUT CORNERS
FOR 90° INTERSECTION
(PLAN VIEW)



NOTES

- 1. CITY COUNCIL MAY, BY ORDINANCE, ADOPT SPECIFIC STANDARDS FOR INDIVIDUAL STREETS THAT DIFFER FROM THESE OFFICIAL STANDARD STREET DIMENSIONS. COMMUNITY PLANS AND SPECIFIC PLANS SHOULD BE REVIEWED FOR FOOTNOTES, INSTRUCTIONS AND/OR MODIFIED STREET DIMENSIONS THAT WOULD REQUIRE STANDARDS DIFFERENT THAN THOSE INDICATED ON THIS STANDARD PLAN.
- 2. FOR ADDITIONAL GUIDANCE AS TO THE USE OF THE ROADWAY AND SIDEWALK AREA, PLEASE REFER TO THE COMPLETE STREET DESIGN GUIDE AND MANUALS.
- 3. FOR DISCRETIONARY PROJECTS REQUIRING ACTION FROM THE DEPARTMENT OF CITY PLANNING (PLANNING), PLANNING MAY INCLUDE SPECIFIC INFORMATION AS TO THE DESIGN AND UTILIZATION OF THE SIDEWALK AREA.
- 4. WHERE A DESIGNATED ARTERIAL CROSSES ANOTHER DESIGNATED ARTERIAL STREET AND THEN CHANGES IN DESIGNATION TO A STREET OF LESSER STANDARD WIDTH, THE ARTERIAL SHALL BE TAPERED IN A STANDARD FLARE SECTION ON BOTH SIDES, AS ON SHEET 3, TO MEET THE WIDTH OF LESSER DESIGNATION AND PROVIDE AN ORDERLY TRANSITION.
- 5. PRIVATE STREET DEVELOPMENT SHOULD CONFORM TO THE STANDARD PUBLIC STREET DIMENSIONS SHOWN ON THE SHEET, WHERE APPROPRIATE. VARIATIONS MAY BE APPROVED ON A CASE-BY-CASE BASIS BY THE CITY.
- 6. FIFTY-FOOT CURB RADII (INSTEAD OF THE STANDARD 35' CURB RADII) SHALL BE PROVIDED FOR CUL-DE-SACS IN INDUSTRIAL AREAS. SEE CUL-DE-SAC ILLUSTRATION FOR FURTHER DESIGN STANDARDS.
- 7. ALLEYS SHALL BE A MINIMUM OF 20' IN WIDTH AND INTERSECTIONS AND/OR DEAD-END TERMINUSES SHALL BE DESIGNED TO CONFORM TO THE ALLEY ILLUSTRATIONS INCLUDED HEREIN.
- 8. FOR INTERSECTIONS OF STREETS, THE FOLLOWING DEDICATIONS SHALL APPLY;
 - A. INTERSECTIONS OF ARTERIAL STREETS WITH ANY OTHER STREET: 15' X 15' CUT CORNER OR 20' CURVED CORNER RADIUS.
 - B. INTERSECTIONS ON NON-ARTERIAL AND/OR HILLSIDE STREETS: 10' X 10' CUT CORNER OR 15' CURVED CORNER RADIUS.
- 9. STREETS THAT ARE ACCOMPANIED BY A PARALLEL FRONTAGE AND/OR SERVICE ROAD ARE DEEMED TO MEET THE STREET STANDARDS SET FORTH HEREIN AND THE DEDICATION REQUIREMENT SHALL BE NO MORE THAN IS NECESSARY TO BRING THE ABUTTING SIDEWALK DIMENSION INTO COMPLIANCE WITH THE STREET STANDARD.
- 10. DUE TO THEIR UNIQUE CHARACTER AND DIMENSIONS ALL STREETS DESIGNATED AS DIVIDED ARE CONSIDERED TO HAVE MET THEIR STREET STANDARD AND THE DEDICATION SHALL BE NO MORE THAN IS NECESSARY TO BRING THE ABUTTING SIDEWALK DIMENSION COMPLIANT WITH THE STREET STANDARD.
- 11. THE DIMENSION OF ANY MEDIAN, DIVIDED STRIP AND/OR TRANSIT WAY SHALL BE INCLUDED WHEN DETERMINING THE RIGHT-OF-WAY DIMENSION.
- 12. THE LOCATION OF THE DRAINAGE GUTTER IS NOT RESTRICTED TO THE CENTER OF THE SHARED STREET AND CAN BE PLACED WHERE NECESSARY AS APPROVED BY THE CITY.
- 13. A SHARED STREET SHALL PROVIDE A DEDICATED PEDESTRIAN ACCESS ROUTE.



EXHIBIT 8



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: **NOV 09 2021**

Case No. **CPC-2021-3512-VZC-VCU**
CEQA: ENV-2021-3513-CE
Plan Area: Wilshire
Related Case: CPC-2008-619-ZC-DA-M1

Council District: 5 – Koretz

Project Site: 8700 Beverly Boulevard (8575 West 3rd Street;
8723 West Alden Drive; 8660 – 8730 West Beverly Boulevard;
110 North George Burns Road; 103 – 139 South George Burns Road;
8705 – 8750 West Gracie Allen Drive; 111 North San Vicente Boulevard)

Applicant: Richard B. Jacobs, Cedars-Sinai Medical Center
Representative: Jeffrey Haber & Michael Nytzen, Paul Hastings LLP

At its meeting of **October 21, 2021**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

Modification of existing [Q] and [D] conditions and the amendment to an existing Development Agreement in order to allow for the addition of a new 405,000 square-foot hospital wing with 203 patient beds pursuant to California's Alfred E. Alquist Hospital Facilities Seismic Safety Act, which requires that, by 2030, all acute care hospitals in California be able to withstand a major earthquake and remain functioning.

1. **Determined**, that based on the whole of the administrative record, the project is exempt from CEQA pursuant to CEQA Guidelines, Section 15302, Class 2, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approved and Recommended** that the City Council **adopt**, pursuant Section 12.32 Q of the Los Angeles Municipal Code (LAMC), a Vesting Zone Change from [T][Q]C2-2D-O to [T][Q]C2-2D-O, subject to the Tentative "T" and Qualified "Q" Classifications and "D" Development Limitation;
3. **Approved**, pursuant to LAMC Section 12.24 T.3(a), a Vesting Conditional Use to permit the addition of a new 405,000 square-foot hospital wing with 203 patient beds;
4. **Adopted** the attached Modified Conditions of Approval; and
5. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Perlman
Second: Hornstock
Ayes: Campbell, Choe, Leung, López-Ledesma
Absent: Mack, Millman, Dake Wilson

Vote: 6 – 0

Cecilia Lamas (Electronic Signature due to COVID-19)

Cecilia Lamas, Commission Executive Assistant
Los Angeles City Planning Commission

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

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission as it relates to the Vesting Zone Change is appealable by the Applicant only, if disapproved in whole or in part by the Commission. The decision of the Los Angeles City Planning Commission, regarding the remaining approvals, is appealable to the Los Angeles City Council within 20 days after the mailing date of this determination letter. 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 Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: **NOV 29 2021**

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

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: Zone Change Ordinance, Map, Modified Conditions of Approval, Findings, Interim Appeal Filing Procedures

c: Heather Bleemers, Senior City Planner
Esther Ahn, City Planner

EXHIBIT 9



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: **MAY 26 2020**

Case No. CPC-2019-6216-VZC-CU-CDP

Council District: 11 – Bonin

CEQA: ENV-2019-6217-CE

Plan Area: Palms – Mar Vista – Del Rey

Related Cases: DIR-2019-3689-CDP; DIR-2018-4427-CDP

Project Site: 4640 – 4660 South Lincoln Boulevard;
13201 – 13205 West Mindanao Way

Applicant: CFHS Holdings, Inc. and Centinela Freeman Holdings, Inc.
(dba Cedars-Sinai Marina Del Rey Hospital)

Representative: Jeff Haber/Michael Nytzen, Paul Hastings LLP

At its meeting of **May 14, 2020**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

Replacement of the existing Cedars-Sinai Marina Del Rey Hospital with new acute care hospital facilities, in compliance with the Alfred E. Alquist Hospital Facilities Seismic Safety Act. The Project will be constructed on the existing Cedars-Sinai Marina Del Rey Hospital site (Project Site). To maintain hospital operations, the new replacement hospital building will be constructed on the Project Site prior to the demolition of the existing 96,480 square-foot hospital building (licensed for 133 patient beds).

The Project will construct the following replacement facilities: 1. A nine-story, 258,500 square-foot hospital measuring 191 feet in height and providing a total of 160 patient beds; 2. A new two-story energy center building with approximately 6,000 square feet of floor area and 14,000 square feet of mechanical area, measuring 55 feet in height; 3. An approximately 4,500 square-foot loading dock; 4. A 300 square-foot fire pump building; 5. A medical gas enclosure; and a DWP substation and switchgear enclosure. The Project will also include a comprehensive sign program. The Project will provide a total of 392 automobile parking spaces, with 292 parking spaces located on-site and a total of 100 parking spaces located off-site. A total of 54 long-term and 27 short-term bicycle parking spaces will be provided on-site. The Project will include two (53-foot by 11-foot) temporary mobile imaging trailers on-site that will be used for magnetic resonance imaging (MRI) and computed tomography (CT) scans during construction, and will be removed upon completion of the replacement hospital building.

1. **Determined**, that based on the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15302, Class 2, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approved and Recommended** that the City Council adopt, pursuant to Sections 12.32 F and 12.32 Q of the Los Angeles Municipal Code (LAMC), a Vesting Zone Change from [Q]C2-1 and P-1 to (T)(Q)C2-1;

3. **Approved**, pursuant to LAMC Sections 12.24 T and 12.24 U.14, a Vesting Conditional Use Permit for a Major Development Project that creates more than 100,000 square feet of nonresidential floor area in the C2 Zone;
4. **Approved**, pursuant to LAMC Section 12.20.2, a Coastal Development Permit authorizing the Proposed Project located within the Single-Permit Jurisdiction of the California Coastal Zone;
5. **Adopted** the attached Modified Conditions of Approval; and
6. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Millman
Second: Khorsand
Ayes: Ambroz, Leung, Mack, Mitchell
Absent: Choe, Padilla-Campos, Perlman

Vote: 6 – 0



Cecilia Lamas, Commission Executive Assistant
Los Angeles City Planning Commission

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

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission as it relates to the Vesting Zone Change is appealable by the Applicant only, if disapproved in whole or in part by the Commission. The decision of the Los Angeles City Planning Commission, regarding the remaining approvals, is appealable to the Los Angeles City Council within 20 days after the mailing date of this determination letter. 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 Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: JUN 15 2020

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

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: Zone Change Ordinance, Map, Modified Conditions of Approval, Findings, Interim Appeal Procedure

c: Faisal Roble, Principal City Planner
Juliet Oh, Senior City Planner
Esther Serrato, City Planner

EXHIBIT 10



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: **OCT 27 2020**

Case No. CPC-2017-5090-VCU-CU-SPR

Council District: 13 – O' Farrell

CEQA: ENV-2017-5091-EIR; SCH No. 2018011071

Plan Area: Hollywood

Related Case: VTT-80310

Project Site: 6040 – 6060 Sunset Boulevard; 1432, 1445 – 1455 North Beachwood Drive; 1443 – 1455 Gordon Street; 1438 North Gower Street; 6065 Fountain Avenue; APNs 5545013057 and 5545013058

Applicant: Hudson Pacific Properties, Inc.
Representative: Cindy Starrett & Benjamin Hanelin, Latham & Watkins, LLP

At its meeting of **October 22, 2020**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

The demolition of 130,169 square feet of existing floor area and the construction of 619,942 square feet of new floor area, consisting of 556,557 square feet of creative office and 62,385 square feet of sound stage and production support space within four buildings (Buildings A, B, D, and E), with a maximum building height of 15 stories (240 feet). Overall, the Project would result in a total of 828,339 square feet of creative office space, 65,319 square feet of production support, 205,202 square feet of sound stages, and 6,516 square feet of restaurant space on the Project Site, with a total floor area of 1,040,148 square feet. The Project will preserve and relocate the United Recording Building on-site. Parking would be provided in four subterranean parking levels below the existing basecamp and Building E; four subterranean parking levels below Building D; and three subterranean levels below Building A, for a total of 1,244 new parking spaces. The Project Site's existing 1,398 parking spaces would remain. A total of 316,500 cubic yards of material would be exported from the site.

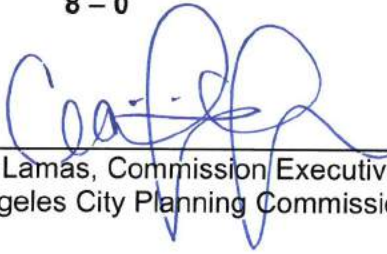
1. **Found**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, that the Project was assessed in the Environmental Impact Report (EIR) No. ENV-2017-5091-EIR (State Clearing House No. 2018021071) which includes the Draft EIR dated May 2020, and the Final EIR, dated August, 2020, previously certified on September 22, 2020; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project;
2. **Approved**, pursuant to Sections 12.24 T.3(b) and 12.24 U.14 of the Los Angeles Municipal Code (LAMC), a Vesting Conditional Use Permit for a Major Development Project for the addition of more than 100,000 square feet of non-residential floor area;
3. **Approved**, pursuant to LAMC Section 12.24 W.19, a Conditional Use Permit to permit Floor Area Averaging across the project site;
4. **Approved**, pursuant to LAMC Section 12.24 W.27 and 12.24 F, a Conditional Use Permit for a Commercial Corner Development with hours of operation past 11:00 pm, and a maximum building height of 60 feet in lieu of a maximum height of 45 feet as otherwise required by LAMC Section 12.22 A.23;

5. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for a project that would result in an increase of 50,000 gross square feet of non-residential floor area;
6. **Adopted** the attached Modified Conditions of Approval; and
7. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Perlman
Second: Khorsand
Ayes: Ambroz, Choe, Leung, Mack, Millman, Mitchell

Vote: 8 – 0



Cecilia Lamas, Commission Executive Assistant
Los Angeles City Planning Commission

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

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is appealable to the Los Angeles City Council 15 days after the mailing date of this determination letter. Any appeal not filed within the 15-day period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: NOV 12 2020

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

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: Modified Conditions of Approval, Amended Findings, Interim Appeal Filing Procedures, Appeal Fact Sheet

c: Luci Ibarra, Principal City Planner
Milena Zasadzien, Senior City Planner
Alan Como, City Planner
Jason McCrea, Planning Assistant

EXHIBIT 11



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: **OCT 31 2018**

Case No. CPC-2015-2025-DB-MCUP-CU-SPR

Council District: 13 – O'Farrell

CEQA: ENV-2015-2026-EIR; SCH No. 2015101073

Plan Area: Hollywood

Related Case: VTT-73568-1A

Project Site:

1540–1552 Highland Avenue
6663–6675 Selma Avenue,
1543–1553 McCadden Place,
1501–1573 Las Palmas Avenue,
1600–1608 Las Palmas Avenue,

6700–6760 Selma Avenue,
6660 Selma Avenue,
1542–1546 McCadden Place,
1500–1570 Las Palmas Avenue,
6665–6713½ Sunset Boulevard

Applicant:

Bill Myers, CRE-HAR Crossroads SPV, LLC

Representative: Kyndra J. Casper, DLA Piper, LLP

At its meeting of **September 13, 2018**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

The Project retains and rehabilitates Crossroads of the World, the former Hollywood Reporter Building and the Bullinger Building and removes all other existing improvements on the Project Site to construct a mixed-use development on a 8.34-acre site in the Hollywood Community Plan Area. The Project (including existing uses to be retained within the Crossroads of the World complex and the uses to be included in the former Hollywood Reporter Building and the Bullinger Building) includes approximately 1,381,000 square feet of floor area, consisting of 950 residential units, 308 hotel rooms, and approximately 190,000 square feet of commercial/retail uses and a new above-ground parking structure on the eastern side of the Project Site. Included among the residential units are 105 dwelling units for Very Low Income Households, to replace the existing 82 residential units covered by the City's Rent Stabilization Ordinance. The proposed floor area ratio (FAR) is approximately 3.81:1 averaged across the Project Site. The Project results in a net increase of approximately 1,208,427 square feet of floor area on site.


1. **Found**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the previously certified Crossroads Hollywood Project Environmental Impact Report (EIR) which includes the Draft EIR, ENV-2015-2026-EIR, SCH No. 2015101073, dated May 11, 2017, the Final EIR, dated May 4, 2018, and the Errata, dated August 2018, certified on September 13, 2018; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, or addendum is required for approval of the Project;
2. **Approved**, pursuant to Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC), a Density Bonus Compliance Review, reserving 11 percent, or 105 units, for Very Low Income Households, and utilizing Parking Option 1, with the following incentives:
 - a. An On-Menu Incentive to permit a 35 percent increase in the maximum allowable Floor Area Ratio (FAR) from 2:1 to 2.7:1 FAR (for the C4-2D-SN portion of the site and Parcel E1) and from 3:1 to 4.05:1 FAR (for the C4-2D portion of the site);

- b. An On-Menu Incentive to permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site, density, parking and open space on two or more contiguous lots and permitting vehicular access from a less restrictive zone to a more restrictive zone; and
 - c. A Waiver of Development Standard (Off-Menu) to permit an approximately 16.51 percent increase of 3.8:1 FAR in lieu of approximately 3.26:1 FAR averaged across the site.
3. **Approved**, pursuant to LAMC Section 12.24 W.1, a Master Conditional Use to permit the on-site and off-site sale, dispensing and consumption of a full line of alcoholic beverages in connection with a total of 22 establishments associated with the Project's proposed hotel and commercial uses;
 4. **Approved**, pursuant to LAMC Section 12.24 W.18, a Master Conditional Use to permit eight uses with public dancing and live entertainment;
 5. **Approved**, pursuant to LAMC Section 12.24 U.14, a Major Development Project Conditional Use Permit for a project creating 250 or more hotel guest rooms, and 100,000 square feet or more of floor area in other nonresidential uses in the C4 Zone;
 6. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for a project that would result in an increase of 50 or more dwelling units;
 7. **Adopted** the attached Conditions of Approval as modified by the Commission; and
 8. **Adopted** attached the Findings.

The vote proceeded as follows:

Moved: Khorsand
 Second: Ambroz
 Ayes: Choe, Mack, Mitchell, Perlman, Millman
 Nays: Padilla-Campos, Dake Wilson

Vote: 7 – 2



 James K. Williams, Commission Executive Assistant II
 Los Angeles City Planning Commission

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

Effective Date/Appeals: *The decision of the Los Angeles City Planning Commission regarding the Off-Menu Waiver is not appealable.* The decision of the Commission regarding the remainder of the actions is appealable to the City Council within 15 days of the mailing of this determination letter. The filing of an appeal stays proceedings in the matter until the appellate body makes a decision. An appeal not filed within the 15-day period shall not be considered by the Council.

Appeals shall be filed on forms provided at the Planning Department's Development Service Center located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: NOV 15 2018

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable and the decision is final.**

EXHIBIT 12



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

DATE: JUL 10 2019

Case No. **CPC-2017-3854-VZC-ZV-CU-ZAD-SPR**

Council District: 1 – Cedillo

ENV-2017-3855-MND

Plan Area: South Los Angeles

Project Site: 1810-1812 Venice Boulevard;
1605-1609 Berendo Street; 1608-1618 Catalina Street

Applicant: John Murphy
Representative: Stacey Brenner, Brenner Consulting Group Inc.

At its meeting of **June 13, 2019**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following Project:

Demolition of an existing 16,964 square-foot building and the construction of a new 142,306 square-foot, 7-story 77-foot tall building for storage of household goods, on 10 lots with a total area of 33,288 square-feet. The proposed building will have a Floor Area Ratio (FAR) of 4.27:1 and contain approximately 1,527 units. The hours of operation will be from 7:00 a.m. to 8:00 p.m. daily and the proposed Project will provide 24 automobile parking spaces in lieu of 47, and 6 bicycle parking spaces in lieu of 30.

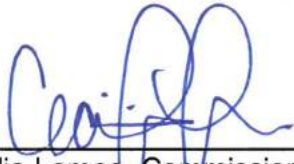
1. **Found**, pursuant to CEQA Guidelines Section 15075(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2017-3855-MND, and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the Project will have a significant effect on the environment; **Found** the Mitigated Negative Declaration reflects the independent judgement and analysis of the City; **Found** the mitigation measures have been made enforceable conditions on the project; and **Adopted** the Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program prepared for the Mitigated Negative Declaration;
2. **Approved**, pursuant to Section 12.32.Q of the Los Angeles Municipal Code (LAMC), a Vesting Zone Change from CM-1-CPIO to (T)(Q)CM-2;
3. **Approved**, pursuant to LAMC Section 12.27, a Zone Variance to allow reduced parking of 24 spaces in lieu of 47 required spaces;
4. **Approved**, pursuant to LAMC Section 12.24.W.50, a Conditional Use Permit for the construction of a building for storage of household goods within 500 feet of an R Zone;
5. **Dismissed as Not Necessary**, pursuant to LAMC Section 12.24.W.37, a Conditional Use Permit for parking in an R Zone;
6. **Approved**, pursuant to LAMC Section 12.24.X.22, a Zoning Administrator's Determination for relief from the transitional height regulation to allow a building taller than 33 feet within 50 to 99 feet of an A1 Zone, and taller than 61 feet within 100-199 feet of an A1 Zone;
7. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for a Project which results in an increase of 50,000 gross square feet or more of nonresidential floor area;
8. **Adopted** the attached Conditions of Approval; and
9. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Millman
Second: Perlman
Ayes: Khorsand, Leung, Mack, Mitchell
Nay: Ambroz
Absent: Choe, Padilla-Campos

Vote: 6 – 1

MOTION PASSED



Cecilia Lamas, Commission Executive Assistant
Los Angeles City Planning Commission

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

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is not appealable as it relates to the Vesting Zone Change. The remainder of the Commission action is appealable to the Los Angeles City Council 20 days after the mailing date of this determination letter. 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 Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: JUL 30 2019

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g. ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

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: Zone Change Ordinance, Map, Conditions of Approval, Findings

c: Faisal Roble, Principal City Planner
Michelle Singh, Senior City Planner
Alan Como, City Planner

EXHIBIT 13



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 532, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: JAN 25 2017

Case No.: CPC-2014-2947-TDR-ZC-ZV-CDO-SPR

Council District: 14 – Huizar

CEQA: ENV-2014-2948-MND

Plan Area: Central City

Project Site: 951–959 South Broadway;
215 West Olympic Boulevard

Applicant: Joe Bednar, Agoura Oaks, LLC
Representative: Kate Bartolo & Associates

At its meeting of **January 12, 2017**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

The demolition of an existing surface parking lot, and the construction of a 15-story, 164-foot, 6-inch tall mixed-use development. The Project will contain 163 residential condominiums and approximately 6,406 square feet of ground floor commercial space. A total of 202 vehicle parking spaces and 186 bicycle parking spaces would be provided at the ground level and in four subterranean levels. The proposed Project would consist of a total of 189,960 square feet of floor area. The Project would export approximately 31,055 cubic yards of dirt.

1. **Found**, that the Mitigated Negative Declaration (Case No. ENV-2014-2948-MND) previously adopted on October 13, 2016 (under Case No. VTT-72342-CN), and associated Mitigation Monitoring Program adequately serves as the environmental clearance;
2. **Recommend** that the City Council **Adopt** a Transfer of Floor Area Rights (TFAR) pursuant to Sections 14.5.6 and 14.5.8 through 14.5.12 of the Los Angeles Municipal Code (LAMC), from the Los Angeles Convention Center (Donor Site) at 1201 S. Figueroa Street for the approximate amount of 65,982 square-feet to the project site (Receiver Site) permitting a maximum FAR of 9.2:1 and 189,960 square-feet of floor area in lieu of a 6:1 FAR which permits 123,978 square-feet of floor area.
3. **Recommend** that the City Council **Adopt**, a Zone Change to amend Ordinance No. 180,871, pursuant to LAMC Section 12.32 as follows:
 - a. **Modified** [Q] Condition Number 6.c. to allow limited rooftop projections of up to 8-feet for a pool and transparent guard wall above the 150-foot height maximum and within the 30-foot setback required for all portions of buildings above 150-feet;
 - b. **Modified** [Q] Condition Number 7 to allow penthouse units to project 9-feet 6-inches above the 150-foot maximum, without meeting the minimum lot coverage of 30 percent required for portions of buildings over 150-feet;
4. **Dismissed** as not necessary a Zone Variance from LAMC Section 12.21 A.16(e)(2)(iii) to deviate from the siting requirements for long-term bicycle parking to locate 131 of the 163

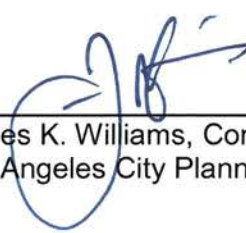
- long-term bicycle spaces on the subterranean parking levels in lieu of the ground floor, pursuant to LAMC Section 12.27;
5. **Approved**, a Design Overlay Plan Approval within the Broadway Theater and Entertainment District Community Design Overlay (Broadway CDO), pursuant to LAMC Section 13.08;
 6. **Approved**, a Site Plan Review for a project that creates a maximum 189,960 square-feet of development, including 163 residential units and 6,406 square-feet of commercial uses;
 7. **Adopted** the attached Conditions of Approval as modified by the Commission; and
 8. **Adopted** the attached Findings.

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: Ambroz
Seconded: Dake Wilson
Ayes: Choe, Katz, Mack, Padilla-Campos, Perlman
Absent: Ahn, Millman

Vote: 7 – 0



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission, in approving the Community Design Overlay and the Site Plan Review, is appealable to the Los Angeles City Council within 15 days after the mailing date of this determination letter. Any appeal not filed within the 15-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: FEB 09 2017

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: Ordinance, Map, Conditions of Approval, Findings

c: Shana Bonstin, Senior City Planner
Jennifer Caira, City Planner

EXHIBIT 14



LOS ANGELES CITY PLANNING COMMISSION
200 N. Spring Street, Room 532, Los Angeles, California, 90012-4801
(213) 978-1300; planning.lacity.org

LETTER OF DETERMINATION

Mailing Date:

**CASE NO.: CPC-2013-3262-ZC-HD-PUB-
ZV-ZAA-SPR**

CEQA: ENV-2013-3263-MND

Location: 6000 West Santa Monica Boulevard
Council District: 13 — O'Farrell
Plan Area: Hollywood
Requests: Zone Change, Height District,
Public Benefit Project, Zone Variance,
Zoning Administrator's Adjustment, Site
Plan Review

Applicant: Jon Pecoraro, Hollywood Forever Cemetery
Representative: Donna Tripp, Craig Lawson & Company, LLC

At its meeting of October 13, 2016, the Los Angeles City Planning Commission took the following action:

1. **Adopted** the Mitigated Negative Declaration No. ENV-2013-3263-MND and the revised Mitigation Monitoring Program (MMP) as the adequate environmental clearance.
2. **Approved** a Zone Change and Height District Change from A1-1XL to (T)(Q)A1-2D.
3. **Approved** Alternative Compliance for a Public Benefit Project to permit the expansion of an existing Cemetery Use in the AI Zone, with the following alternatives from the Performance Standards of Section 14.00 A.1 of the LAMC:
 - a. Allow buildings on the site that are set back between 9-feet 6-inches to 210-feet from adjoining streets, R zoned properties and residential uses.
 - b. Permit a front yard setback of 9-feet 6-inches.
 - c. Permit a variable landscape buffer of 9-feet to 9-feet 6-inches along the Gower Street frontage.
 - d. To dismiss as Not Necessary Alternative Compliance to permit 107 parking spaces.
4. **Approved** a Zoning Administrator's Adjustment to allow a 9-foot 6-inch front yard and 9-foot side yard setbacks in lieu of the otherwise required 25-foot front and side yard setbacks in the AI Zone.
5. **Dismissed** as Not Necessary a Zoning Variance to allow 107 parking spaces in lieu of the otherwise required 148 parking spaces for the addition of 87,688 square feet to an existing Cemetery Use.
6. **Approved** a Site Plan Review to allow the addition of 87,688 square feet of gross nonresidential floor area.
7. **Adopted** the attached modified Conditions of Approval.
8. **Adopted** the attached amended Findings.

RECOMMENDATION TO CITY COUNCIL:

1. **Recommend** that the City Council adopt the Mitigated Negative Declaration No. ENV-2013-3263-MND and the revised Mitigation Monitoring Program (MMP) as the adequate environmental clearance.
2. **Recommend** that the City Council adopt a Zone Change and Height District Change from A1-1XL to (T)(Q)A1-2D.
3. **Recommend** that the City Council adopt the attached Findings.

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: Ambroz
Seconded: Dake Wilson
Ayes: Katz, Mack, Millman, Perlman
Absent: Ahn, Choe, Padilla-Campos

Vote: 6 - 0

James K Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Effective Date/Appeals: The Los Angeles City Planning Commission's decision is appealable to the Los Angeles City Council within 15 days after the mailing date of this determination letter. Any appeal not filed within the 15-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: _____

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.

Attachment: Ordinance, Map, Modified Conditions of Approval, amended Findings
Senior City Planner: Blake Lamb
Project Planner: Mindy Nguyen