Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

February 10, 2011

TO: Pat Modugno, Chair
Esther L. Valadez, Vice Chair
Leslie G. Bellamy, Commissioner
Harold V. Helsley, Commissioner
Curt Pedersen, Commissioner

FROM: Samuel Dea
Section Head
Special Projects Section

SUBJECT: AGENDA ITEM NO. 6
PROJECT NUMBER TR070853-(2)

The following attachments are comments received by staff regarding the above-referenced item:

1. A letter from the Del Aire Neighborhood Association, dated February 7, 2011. In their correspondence, the community group requests that a hearing be held in the Del Aire neighborhood, West 117th street be modified to a cul-de-sac, and pedestrian access to the project site at 116th Street be eliminated.

2. A letter from the applicant's agent, Charles J. Moore (Cox, Castle & Nicholson), dated February 10, 2011, in support of the project.

3. A letter from the co-applicant, County of Los Angeles Metropolitan Transportation Authority, dated February 10, 2011, in support of the project.

If you need further information, please contact Carolina Blengini from my staff at (213) 974-1522 or cblengini@planning.lacounty.gov. Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

SD:CB:cb

Attachments

February 7, 2011

County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RECEIVED
FEB 7 2011

RE: Proposed Aviation Station Development
County Project No. TR070853 -(Z)

Honorable Commissioners:

The Del Aire Neighborhood Association believes that the proposed development is a positive improvement to our community. We recognize the need to develop transit oriented residential units in our community, as well as the surrounding communities.

This proposed development will have a profound and permanent impact on our working class community of single-family homes. For this reason we need to get this right the first time.

I respectfully request that this Commission hold a hearing in our community before deciding to approve or deny the entitlements for this development.

Over the last year and a half, I have had many conversations with the property owner, his attorney and architects. This relationship has been respectful and open and very welcome. However, the traffic and parking mitigation issue came to an impasse very early on and we have not been able to resolve them.

The EIR study of nine key intersections (page 5.1.2) completely ignores the path of least resistance, the direct corridor through the middle of our neighborhood, from La Cienega and the 405 freeway to 120th Street West, to Judah Avenue North, to 117th Street West and directly into the underground parking for this development (see Map A).

The study assumes that all ingress and egress will be directly to and from Aviation Blvd., by way of 117th Street. The only mitigation measure proposed has been to limit egress to right turn only and ingress to left turn only. This woefully inadequate measure completely ignores the high likelihood of motorists entering from the east, and heading west on 117th Street.

I have proposed constructing a cul-de-sac on 117th Street, just east of the underground parking entrance that is proposed. This entrance is right in front of six single-family homes (see Map B). I have conducted an informal survey of the affected residents on 117th and received near unanimous agreement that a cul-de-sac would be necessary.

Many motorists will travel west on 120th having just exited the 405 freeway and rather than wait for the light and/or for traffic to clear at Aviation Blvd., they will simply turn north on Judah then west on 117th. This is currently the most popular route as there are no traffic signals or stop signs and the street is 6-lanes wide. This substantial increase of traffic through our quiet neighborhood will be devastating.

Given the size and scope of this project we feel that requesting one cul-de-sac on one street is not only a modest request, it is reasonable. The developer has rejected this idea.

In addition to the problem of through traffic down the middle of our neighborhood, there is the parking issue.

The assertion in the EIR that "the project would not result in excessive on-street parking and no significant impact would result" (Page 5.1.27-paragraph 2) is wishful thinking given that this development will remove 10 or so single-family homes with driveway parking, replacing them with 20 street level town homes with no driveways. This by itself, will decrease the availability of congestion on-street parking. These 20 new residences by themselves will create more competition for on-street parking. The only mitigation offered for the on-street parking that according to the EIR "will not happen", are parking permits for our existing residents. This is inadequate and unacceptable, as this simply shifts the mitigation burden to the existing residents and their guests. This idea also simply pushes the problem south to the nearest non-permitted street.

As a member of the Community Advisory Council that meets with Capt. Matt Dendo, of LACSD once a month, I can assure you that the LA County Sheriff is not able to run out to our neighborhood to enforce the current parking problems as they stand. They do not have the staff required. Who will enforce this idea, and how much extra frustration are we expected to endure as we call the Sheriff over and over, only to receive spotty enforcement?

Currently there is a pedestrian opening at 116th and Judah (see Map C) that allows our community to be used as an overflow parking lot for the Park and Ride at the Metro. This has been an ongoing problem for many years. Couple that with 390 new residential units, 30,000 square feet of retail and the afore mentioned 20 town homes without driveways to park in and it is easy to picture the irreparable harm that this would cause our small neighborhood in the way of parking.

I have been told by the developer that the County wants to leave that open for community access to the new retail, etcetera. Realistically speaking this would only create a slight advantage, (a ½ block shorter walk) for 12 to 15 homes. The alternative is to simply pick

any street, walk west to Aviation Blvd. and enter the front of the facility, a roughly equal walking distance. Leaving the pedestrian opening at 116th and Judah is of no benefit to our community.

We have not demanded a reduction in density, or a reduction in height. We have not demanded more parking spaces. We have not sought a monetary mitigation fund. We are not calling for the project to stop. We are only asking that a few relatively modest measures be added to adequately address the parking and traffic issues unique to our neighborhood.

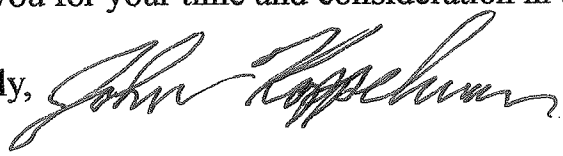
Considering that this is a $200 million project, our request for one cul-de-sac on one street to protect our neighborhood is extremely modest. For the developer to simply propose installing a few street signs, some speed bumps, or set up a parking permit program appears more like an unimaginative afterthought with more emphasis on saving a buck, than saving the integrity of our community

We respectfully request that any decision on this development be postponed until:

A. A hearing is held in our neighborhood so that our working class community can voice their concerns;
B. the issue of a cul-de-sac to address through traffic and parking, are adequately addressed;
C. the closure of pedestrian access to prevent the overflow parking problem is adequately addressed.

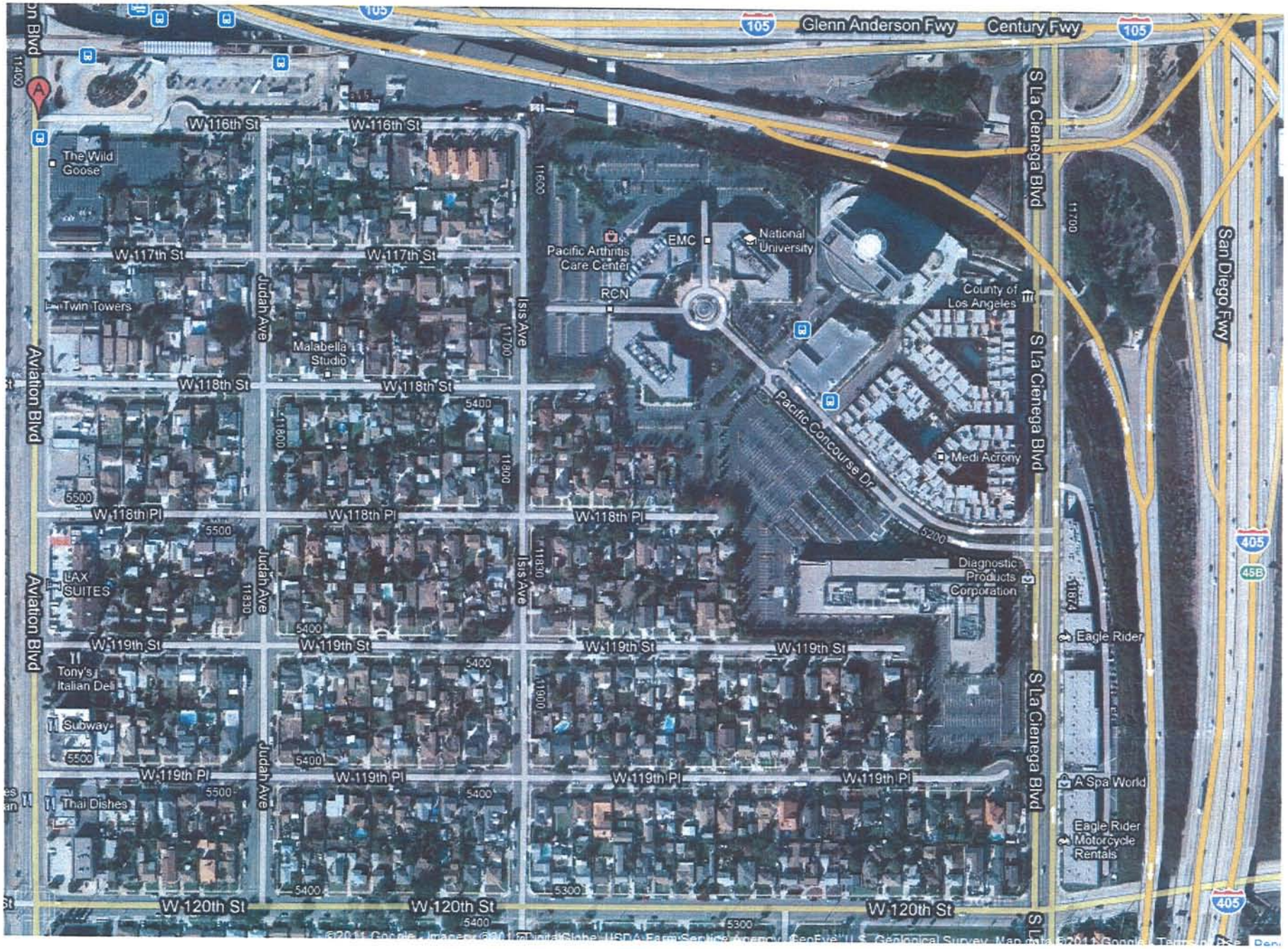
Should this Planning Commission decide to open a hearing in our community (at Juan de Anza Elementary School), the Del Aire Neighborhood Association will proactively encourage the members of our community to be respectful and follow all protocols for a public hearing.

Thank you for your time and consideration in this matter.

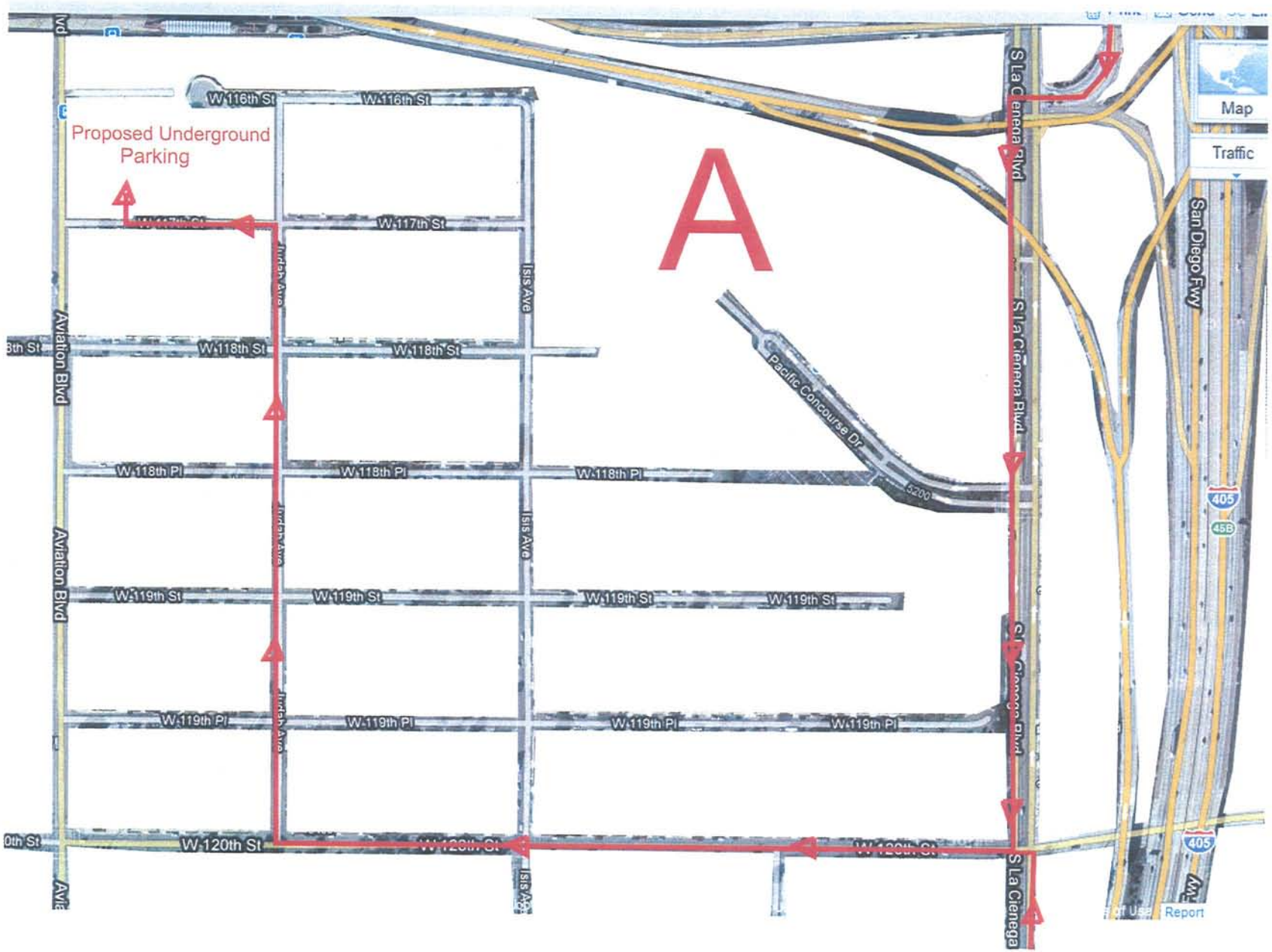
Sincerely, 

John Koppelman, President
Del Aire Neighborhood Association

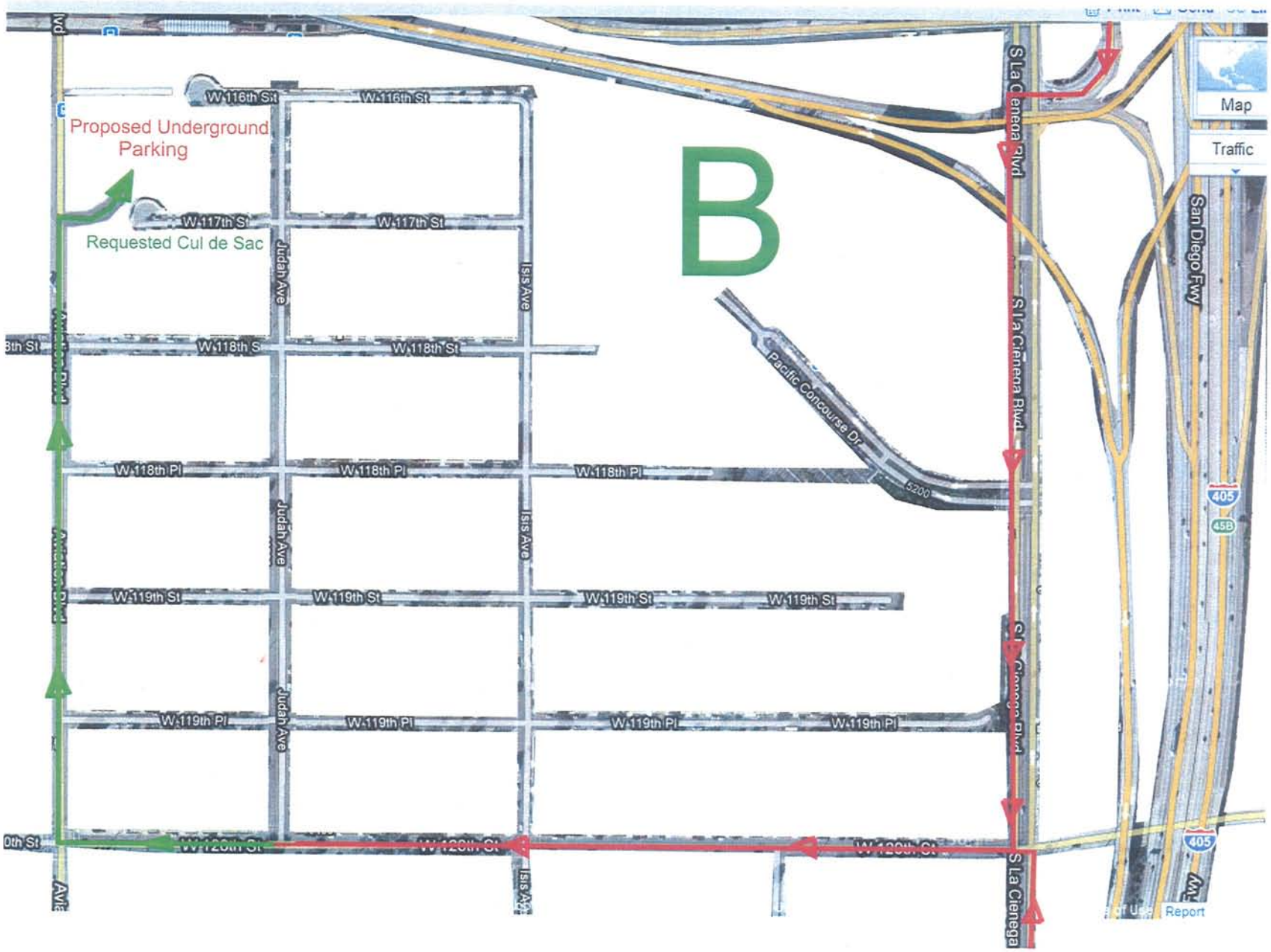
Relevant Area – Del Aire



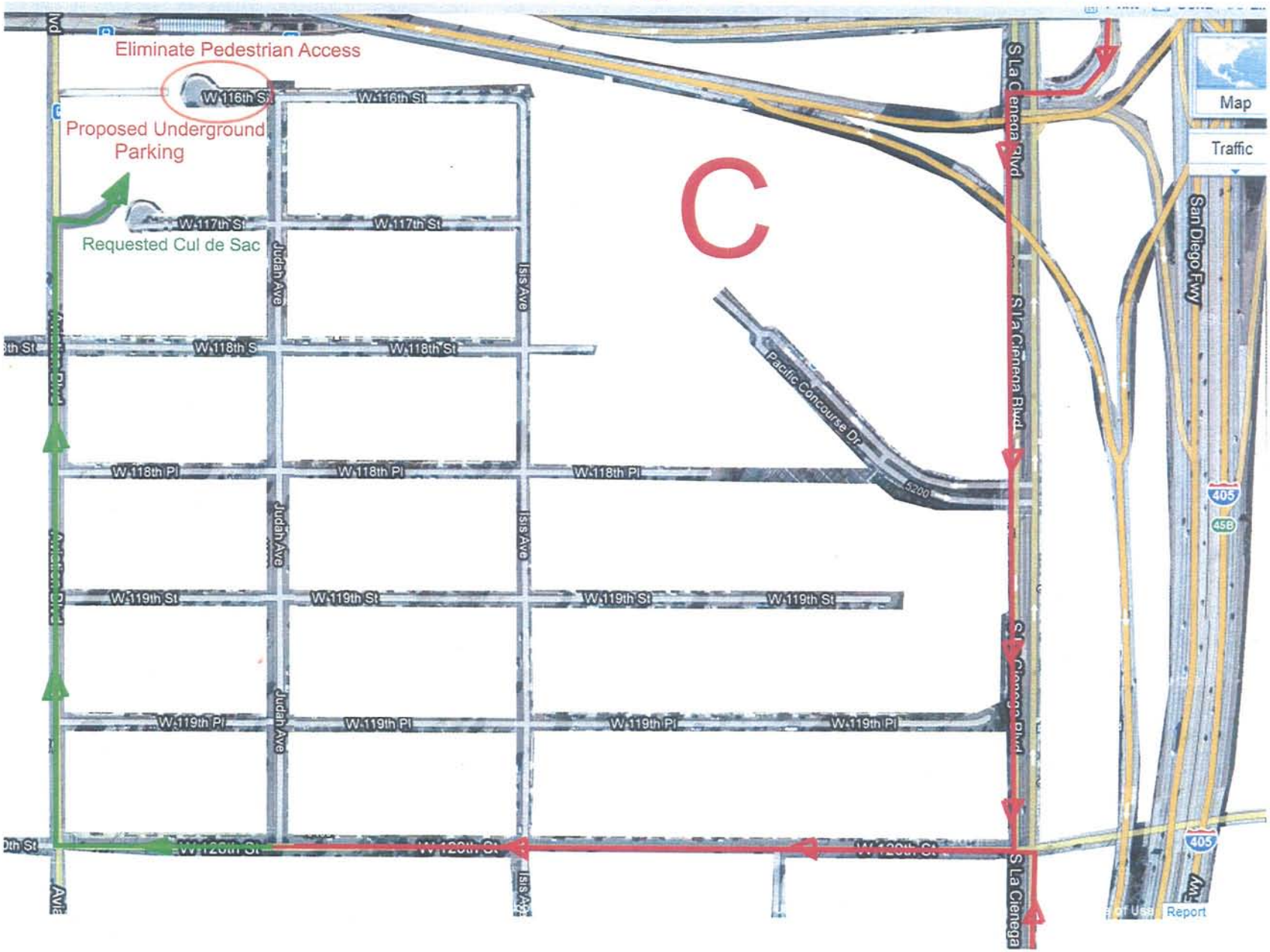
Map A – Path of Least Resistance From La Cienega and/or 405 Freeway



Map B – Desired Traffic Flow
Created by Addition of Cul de Sac on 117th Street



Map C – Eliminate Pedestrian Access to Prevent Neighborhood Parking for MTA and Retail



COXCASTLENICHOLSON

Cox, Castle & Nicholson LLP
2049 Century Park East, 28th Floor
Los Angeles, California 90067-3284
P 310.277.4222 F 310.277.7889

Charles J. Moore
310.284.2286
cmoore@coxcastle.com

File No. 56290

February 10, 2011

BY HAND DELIVERY

Regional Planning Commission
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Re: **Transit-Oriented Development at the Metro Green Line Aviation Station; Regional Planning Commission Hearing Date: February 16, 2011**

Dear Commissioners:

The Aviation Station project is an exciting proposal that will construct at last a transit-oriented development (TOD) within the unincorporated County of Los Angeles.

The project site comprises private and public land at the Metro Green Line Aviation Station, located in the Del Aire community at the intersection of Aviation Boulevard and Imperial Highway near the Los Angeles International Airport (LAX). Seeking to increase ridership on the Green Line, the Los Angeles Metropolitan Transportation Authority (Metro) approached the Kroeze family, the owner of private property and a local business adjacent to the Metro Green Line Aviation Station. Metro proposed a joint development to improve the appearance and experience of the station for transit users and to provide opportunities for new riders with high-density housing located adjacent to transit.

Promoting TOD in Los Angeles is an important goal for most of the region's planning agencies; however, TOD is often stymied by the need for parcel assembly. Parcel shallowness resulting from historical strip commercial zoning makes infeasible retail development and high-density housing necessary for a successful TOD project. This project is possible only because the Kroeze family assembled a city block over the course of 50 years by gradually purchasing the homes surrounding their family business. In 1995, the Metro Green Line opened and the property became ideally located adjacent to a major light rail station. This large assemblage of private property adjacent to transit offers an opportunity very unique in Los Angeles County to redevelop underutilized urban property with a successful, modern TOD project.

TOD projects such as Aviation Station hold the potential to meet many objectives the County is committed to, including increasing the stock of mixed-use infill and workforce housing, mobility, community health and livability, economic development and greenhouse gas emission reductions. Aviation Station is expected to be a revitalizing catalyst project that will spur redevelopment of the Aviation Boulevard corridor.

The design and concept for the Aviation Station project has involved the close cooperation and review of many State and local agencies, County departments, and services providers, including Caltrans, Metro, LAX, the Los Angeles County Local Agency Formation Commission, the Cities of El Segundo, Los Angeles, and Hawthorne, the County Sheriff, Fire, and Public Works Departments, Golden State Water Company, and the Wiseburn School District.

Aviation Station and the Changing Del Aire Community

Aviation Station is located in the unincorporated community of Del Aire—an urban, largely post-World War II neighborhood located near LAX, the Pacific Concourse Industrial Park, the Airport Courthouse, and aviation-related industry located along Aviation Boulevard. Existing infrastructure already serves the property and will be upgraded to assure efficient delivery of water, sewers, and other services.

The area has seen substantial infill development and densification in recent years. Within Del Aire, the Pacific Concourse project approved by the County Board of Supervisors in 2005 was built near the project site at a density of 88 units per acre. Several other high-density housing developments have been approved or constructed in the same area, *e.g.*, Threesixty at The South Bay on El Segundo Boulevard, Fusion at South Bay near Aviation Boulevard and Marine Avenue, and Central Park near the corner of 120th Street and Van Ness Avenue.

Aviation Station is an important stop along the Metro Green Line, and it is the only light rail station providing access to LAX via free shuttle. Aviation Station is planned as a link for the proposed Crenshaw/LAX Transit Corridor Line, a first-phase transit project funded by Measure R. In addition to light rail, Aviation Station is a busy regional bus terminal used by Metro, Santa Monica's Big Blue Bus, Culver CityBus, the Torrance Transit/Municipal Area Express, and the shuttle system to LAX operated by Los Angeles World Airports. Aviation Station connects Del Aire and the surrounding communities to major job centers and regional destinations, and is itself situated proximate to LAX and other significant employment centers.

The private property portion of the project is located adjacent to Aviation Station and is improved currently with the Wild Goose restaurant and bar, an 8-room motel, surface parking, and low-density residential homes developed between the 1930s and 1950s.

The Project Will Redevelop Underutilized Urban Property as Part of a Modern Multimodal TOD Development

The project will be developed jointly by Metro and the Kroeze family. The existing Wild Goose restaurant and bar, motel, low-density housing and existing, inefficient bus facilities and surface parking will be demolished. The project will redevelop the private and public land with 29,500 square feet of retail, 390 multi-family residential units, and a new pedestrian-friendly transit plaza to connect the neighborhood to the station. The project will also construct a new, modernized bus terminal in a more appropriate location adjacent to Aviation Boulevard, directly to the north of the project site, and will reconfigure parking at the existing Park and Ride lot.

The project is designed to establish transit and pedestrian-supportive development, improve public safety and pedestrian access to transit facilities, create new economic and housing

opportunities, and reduce congestion and greenhouse emissions by decreasing vehicle miles traveled and inviting pedestrian access. For development to be transit-oriented, it needs to be more than just adjacent to transit. Development generally needs to be shaped by transit in terms of parking, density, and building orientation in comparison to conventional development for it to be considered transit-oriented. A successful TOD will reinforce both the community and the transit system. Accordingly, the proposed development relates to the station along at its northern elevation, relates to the busy Aviation Boulevard corridor at its western elevation, and steps down to two-story townhomes at the two elevations interfacing with the residential Del Aire neighborhood.

One of the challenges facing Aviation Station is that the platform is elevated, isolated, and does not connect visually to its surroundings. The elevated station platform poses difficulties for access, safety, and creating a sense of neighborhood character. To maximize the potential and place-making qualities of the station, the project design integrates the station with the community, connecting it to the neighboring residences and industrial employment centers and creating usable, pedestrian friendly space and character. The proposed retail uses will be connected visually to the station and will benefit both the community and transit users. In addition, the free airport shuttle will provide opportunities for airport users to use Aviation Station as an extension of the terminal and will provide essential services lacking at the airport. Vehicular traffic and the improved bus terminal will also provide important opportunities for intermodal connectivity.

To increase ridership potential, Metro requires services for transit-users, increased accessibility to the station, and an aesthetically appealing environment to draw people to the station. The project is designed to capture vehicular traffic, to improve the pedestrian experience, and to create a pleasant and safe environment that will encourage people to use the station and transit. Landscaping, architecture and signage will provide a sense of place and community identity.

Aviation Station Implements Important Policies the County Has Promoted for Many Years

From the adoption of the Transit Oriented Districts Ordinance, the Mixed-Use Ordinance, and important policies within the adopted Housing Element to the proposed East LA 3rd Street Specific Plan and Healthy Design Ordinance, the County has consistently attempted to establish TOD as an important component of the overall development pattern to manage the planned growth of the region. The County's efforts have only intensified since California passed significant legislation to reduce greenhouse gas emissions and to promote land use growth patterns that will reduce driving and vehicle miles traveled, *i.e.*, AB 32 and SB 375.

Current County Zoning Regulations Do Not Foster TOD Development

Despite diligent efforts at advanced planning, development within County transit-oriented districts has languished for a decade and current zoning regulations are still not appropriate for modern, urban infill, TOD projects. For example, Aviation Station is a prominent station and an important intermodal transit hub for LAX, yet it is not included within a transit-oriented district. In addition, current parking requirements do not allow the flexibility necessary for transit-oriented projects and current density limitations do not acknowledge the urgent need for high-density development near public transit stations.

The Mixed Use Development Zone Provides the Flexibility Necessary to Build a Successful TOD Project

The underutilized Mixed Use Development zone is the best available mechanism to allow for the development of the project, without the need for variances from the zoning regulations, ahead of any County plans to modernize the zoning regulations. Planning staff selected the Mixed Use Development zone specifically because it provides the flexibility necessary for the ultimate builder or builders to construct the project, but still requires the Planning Director to approve any design changes to assure quality development through the conditional use permit.

However, planning staff proposes to apply also the Development Program combining zone to the property. The Development Program combining zone requires the project to conform to specified plans and exhibits and eliminates the flexibility provided by the Mixed Use Development zone. With the Development Program combining zone, changes in project design require Commission approval of a new conditional use permit and tentative map. However, a builder should be able to accomplish design changes without the need for a new conditional use permit.

In essence, the Mixed Use Development zone properly provides design flexibility by authorizing the Planning Director to approve subsequent, revised site plans, but the Development Program combining zone inappropriately requires the Commission to review a new conditional use permit for the same design changes. The Development Program combining zone is incompatible with the Mixed Use Development zone and should be eliminated.

TOD is Critical For Achieving the State's and the County's Emissions Reduction Targets

Household transportation is the single-largest and fastest-growing source of global warming pollution in the state. Locating housing closer to jobs and transportation choices and creating walkable communities reduces commute times and can cut millions of tons of global warming pollution, while improving quality of life. California households could reduce their transportation-related climate pollution by 30% or more from reduced fuel use alone if development patterns between now and 2020, both inside and outside of the urban core, were more efficient. (A Guide to California's SB 375, Natural Resources Defense Council, June 2009)

If most of California's growth continues to follow typical sprawl development patterns, the result will be higher costs of local services, continued loss of farmland and open space, and increased dependence on automobiles. Consequently, the total number of annual vehicle miles traveled in California is expected to increase from 296 billion miles in 2000 to 400 billion miles by 2020, a 33% increase. (Statewide Transit-Oriented Development Study: Factors for Success in California, CalTrans, 2002) Even with much greater fuel efficiency and low-carbon fuels, California will not be able to achieve its climate goals unless it can reduce the rate of growth in vehicle miles traveled. (A Guide to California's SB 375, Natural Resources Defense Council, June 2009).

TOD Benefits Individuals, Communities, Regions and the State

Nearly a decade ago, Caltrans conducted a study on the factors for successful TOD in California, and cited numerous benefits of TOD (Statewide Transit-Oriented Development Study: Factors for Success in California, CalTrans, 2002):

- **TOD provides mobility choices.** By creating activity nodes linked by transit, TOD provides important mobility options that are very much needed in congested metropolitan areas. This also allows young people, the elderly, people who prefer not to drive, and those who do not own cars the ability to get around.
- **TOD increases public safety.** By creating active places that are busy through the day and evening, and providing "eyes on the street," TOD helps increase safety for pedestrians, transit-users, residents, and businesses.
- **TOD increases transit ridership.** TOD improves the efficiency and effectiveness of transit service investments by increasing the use of transit by 20% to 40%.
- **TOD reduces rates of vehicle miles traveled.** Vehicle travel in California has increased faster than the state's population for years. TOD can lower annual household rates of driving by 20% to 40% for those living, working, and shopping near transit stations.
- **TOD increases households' disposable income.** Housing and transportation are the first and second largest household expenses, respectively. TOD can free-up disposable income by reducing driving costs, saving an estimated $3,000 to $4,000 per year for each household.
- **TOD reduces air pollution and energy consumption rates.** By providing safe and easy pedestrian access to transit, TOD lowers rates of air pollution and energy consumption. Also, TODs reduce rates of greenhouse gas emissions by 2.5 to 3.7 tons per year for each household.
- **TOD conserves resource lands and open space.** Because TOD consumes less land than low-density, auto-oriented growth, it reduces the need to convert farmland and open spaces to development.
- **TOD promotes economic development.** TOD is increasingly used as a tool to help revitalize declining urban neighborhoods and to enhance tax revenues for local jurisdictions.
- **TOD decreases infrastructure costs.** Depending on local circumstances, TOD can help reduce overall infrastructure costs for expanding water, sewage, and roads to local governments by up to 25% through more compact and infill development.
- **TOD promotes affordable and work-force housing.** TOD increases the stock of lower-cost housing and reduces household transportation expenditures, thereby increasing disposable income available to cover housing costs. Housing costs for land and structures can be significantly reduced through more compact growth patterns.

The Current Market Favors TOD and Multi-Family Infill Housing

Several broad demographic trends influencing California's future are expected to contribute favorably to the market demand for TODs. For housing, these trends not only include unprecedented population and household growth, but a shortfall in housing production and a significant need for housing that is affordable to many households in California. Former homeowners who lost their properties to foreclosure are now pouring into the rental market. Meanwhile, tightened credit standards are making it tougher for potential buyers to qualify for a home loan, despite very low interest rates. Compounding the demand for rental housing, Gen-Yers are less interested in home ownership and are unwilling to sign up for the long commutes that their parents lived with.

Los Angeles County is expected to be a renters' market for some time to come, and this project fulfills an important need for multi-family, workforce housing located adjacent to transit and near major employment centers.

We appreciate greatly the diligent work of planning staff and the other County departments and agencies to help form this important TOD project. The project team looks forward to presenting the project to the Commission and answering any questions that you may have.

Sincerely,

Charles J. Moore

56290\4057389v1

cc: Roger Moliere, Metro
Richard Bruckner
Sorin Alexanian
Sam Dea
Carolina Blengini
Patricia Keane
Steve Burger
Janna Masi

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

February 10, 2011

Mr. Richard Bruckner
Department of Regional Planning
County of Los Angeles
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Re: Project No. TR070853-(2)

Dear Mr. Bruckner,

The Los Angeles County Metropolitan Transportation Authority ("LACMTA") joins Kroeze Family LLC and Kroeze Inc. in an application for environmental review of the above-referenced proposal for mixed-use transit-oriented development (the "Project").

Transit-oriented development ("TOD") is a vitally important solution to the development challenges facing Southern California and growing cities across America. With careful planning, TOD is not just a label: TOD gives people good reason to leave their car behind and opt for transit. These are among the primary goals of the LACMTA Joint Development Program; staff members have worked to these ends for several years assisting in the planning needed to make this application.

While needed proprietary agreements have not yet been considered nor approved by the LACMTA Board of Directors, environmental approval of the Project would mark an important milestone. Studies currently being conducted by LACMTA include plans for new transit lines there, but the Metro Green Line Aviation/LAX Station remains unchanged with implementation of the Project by definition. The Project is also subject to both LACMTA statutory requirements and discretionary considerations to be addressed under separate cover.

We support the Project as it would fulfill or enhance a number of important objectives, including economic development in the area. In particular, the Project would also provide important services for transit patrons; these help make the individual transit experience more attractive and also contribute to increased ridership. Among other benefits, the Project also provides opportunities for workforce housing for an important nearby employment center.

We can be reached at (213)922-228 and are available to answer any questions regarding the application.

Sincerely yours,

Roger Moliere
Chief, Real Property Management and Development