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INFORMATION
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CLARIFICATION OF Q CONDITION

November 25, 2015

Applicant/Owner

Larchmont Village
Partners One LLC.
704 Trenton Dr.
Beverly Hills, CA 90210

Representative

Noel Hyun Fleming
Liner LLP.
633 W. 5th St., Suite 3200
Los Angeles, CA 90071

Case No. DIR-2015-2710-CLQ

CEQA: ENV-2015-2711-CE

Related Case: APCC-2013-924-ZC-CUB-ZV

Location: 107 N. Larchmont Blvd.

Council District: 4 – David Ryu

Neighborhood Council Greater Wilshire

Community Plan Area: Wilshire

Land Use Designation: Neighborhood Office Commercial

Zone: [Q]C2-1D

Legal Description: Lot FR 24; Block: 2; Tract: 3501

Last Day to File an Appeal: December 15, 2015

DETERMINATION

Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 H, as the designee of the Director of Planning, I hereby:

Approve the Clarification of [Q] Qualified Condition Number 2(i) of Ordinance No. 168,334 clarifying that a "restaurant" shall mean an establishment with seating that operates primarily for the purpose of selling food to be consumed on the premises (sit-down restaurants), and such use shall be based on a calculation of the majority of square footage for such use. This use is distinguished from food services establishments that operate primarily for the purpose of selling food to be consumed off-premises (take-out establishments).

The project is Categorical Exempt from an environmental review pursuant to Article III Section 1 Class 5 Category 11 of the City of Los Angeles California Environmental Quality Act (CEQA) Guidelines.

Adopt the attached findings.

APPLICANT'S REQUEST

The applicant has requested a Clarification of the [Q] Qualified Condition Number 2(i) in Ordinance No. 168,334 to clarify the term "restaurant" and the meaning of the phrase "primarily for the purpose of selling food to be consumed off-premises," which is used to differentiate take-out food establishments from sit-down dine-in restaurants. The applicant requests that [Q] Qualified Condition Number 2(i) be clarified to mean that if over 50 percent of customer orders are placed for take-out, such food service establishment is operating "primarily" for the purpose of off-premises consumption. As stated in the Ordinance, Condition 2(i) restricts the number of restaurants along Larchmont Boulevard between Beverly Boulevard and 1st Street, a location known as Larchmont Village.

[Q] Qualified Condition Number 2(i) states:

2 (i) Restaurant Uses. The total number of restaurants (defined as "an establishment operating primarily for the purpose of selling food to be consumed on the premises which may have a secondary purpose of selling alcoholic beverages, excluding food services establishments which operate primarily for the purpose of selling food to be consumed off-premises, such as retail bakeries, ice cream parlors, yogurt shops, candy shops, doughnut shops, grocery stores, delicatessens, catering services or coffee stores") may not exceed one for every 270 feet of public street lot frontage.

Such businesses need not be spaced at said intervals, provided that the total number does not exceed the above ratio. No one restaurant may exceed 40 feet of public street lot frontage, and the total public street lot frontage of restaurants may not exceed 200 feet. Drive-through fast-food establishments are prohibited.

BACKGROUND

Larchmont Boulevard is a neighborhood shopping district that is located along three blocks of Larchmont Boulevard between Beverly Boulevard and 1st Street in the Wilshire Community Plan area. Uses permitted in this district are limited by special zoning regulations known as "Q" conditions, which are intended to protect and promote Larchmont Boulevard as a neighborhood-serving shopping district. Section 12.32.G.2(b) of the LAMC defines the purpose of a "Q" Qualified Classification as a necessary action in order to (1) protect the best interest of and assure a development with the surrounding properties or neighborhood; (2) secure an appropriate development in harmony with the General Plan; and (3) prevent or mitigate potential adverse environmental effects of the zone change.

In 1988, the City Council approved a Zone Change from C2-1VL to C1-1VL (Case No. CPC 86-823 GPC) for properties along Larchmont Boulevard between Melrose Avenue and First Street, as part of the General Plan/Zone Consistency Program. The Zone Change was approved to achieve consistency between the Wilshire Community Plan Designation of Limited Commercial and zoning for subject properties. Some retail uses, other than restaurants, became non-conforming as a result of the Zone Change. Neighborhood associations and community members were concerned that a proliferation of restaurants would create a "restaurant row" and change the unique character of Larchmont Boulevard. In order to prevent an overconcentration of such establishments and protect the diverse uses along the Boulevard, the Larchmont Boulevard Association and the Larchmont Village Association asked Council District 4 to

propose a Motion that would limit the total number of restaurants between Beverly Boulevard and 1st Street along Larchmont Boulevard.

Subsequently, the City Council adopted Ordinance No. 167,420 in 1991, establishing permanent "Q" Conditions to limit the number of restaurants along Larchmont Boulevard and Ordinance No. 168,334 in 1992, establishing "Q" Conditions to allow uses permitted in the C1 zone, and certain uses permitted in the C1.5 and C2 zones that were rendered non-conforming after the Zone Change in 1988. The City Planning Commission found that "Q" conditions would help facilitate the retention and expansion of a wide range of neighborhood-oriented shops and services that will insure the continued economic vitality of a pedestrian-oriented shopping district. The Larchmont community supported the adoption of "Q" conditions as necessary to protect the best interests of the neighborhood and to assure diversity in the businesses established in the area, as well as to secure an appropriate development in harmony with the General Plan.

Relevant Cases in Chronological Order

Ordinance 167,420 (CPC 90-0597 ZC): In 1990, the City Council initiated a Zone Change from C1-1VL to [Q]C1-1VL to impose permanent "Q" conditions on commercially zoned property along Larchmont Boulevard south of Beverly Boulevard. The Ordinance restricts ground-floor financial service uses to one business for every 300 feet of public street frontage and restricts restaurants to one for every 270 feet of public street frontage. The Ordinance also allocates a maximum of 40 feet of public street lot frontage per restaurant, and the total public street lot frontage of restaurants is not to exceed 200 feet. Ordinance No. 167,420 was adopted by the City Council, effective December 28, 1991. The Ordinance explicitly defines a restaurant as *"an establishment operating primarily for the purpose of selling food to be consumed on the premises which may have a secondary purpose of selling alcoholic beverages,"* but specifically excludes *"food services establishments which operate primarily for the purpose of selling to be consumed off-premises, such as retail bakeries, ice cream parlors, yogurt shops, candy shops, doughnut shops, grocery stores, delicatessens catering services or coffee stores."*

Ordinance 168,334 (CPC 91-0117-ZC/GPA): In 1992, the City Council adopted Ordinance No. 168,334, approving a Zone Change from C1-1VL and [Q]C1-1VL to [Q]C2-1VL and General Plan Amendment changing the Land Use Designation from Limited Commercial to Neighborhood Commercial along Larchmont Boulevard between Melrose Avenue and First Street. The Ordinance [Q] Qualified Condition Number 1 allows uses permitted in the C1 zone and only certain uses permitted in the C1.5 and C2 zones. These allowed uses were rendered non-conforming after the Zone Change in 1988 from C2-1VL to C1-1VL. Ordinance No. 168,334 incorporates the same "Q" Qualified Conditions of Ordinance No. 167,420, which established "Q" conditions limiting the number of restaurants along Larchmont Boulevard between Beverly Boulevard and First Street, in order to ensure a diversity of uses be maintained for this area. The Ordinance excludes food take-out uses from this limitation.

Ordinance No. 180,564 (CPC-2008-783-ZC-HD): In 2009, the City Council adopted Ordinance No. 180,564 effecting a Zone and Height District Change from [Q]C2-1VL to [Q]C2-1D for commercially zoned parcels along the west and east sides of Larchmont Boulevard bounded by First Street to the south and Beverly Boulevard to the north. The Ordinance imposes design standards and "D" Development Limitations to reinforce the General Plan Land Use Designation of Neighborhood Commercial Office. Regulations, such as smaller storefronts, were included to encourage neighborhood retail and services to locate in the area and maintain the area's pedestrian orientation. The goal was to improve the general environment of the community by placing design controls on site planning and building design to ensure that new development is

of a scale and character that is consistent with the subject area, in accordance with the Wilshire Community Plan.

APCC-2013-1033-ZC: On February 11, 2014, the Central Area Planning Commission denied a Zone Change request for the property located at 147 N. Larchmont Boulevard to add "indoor studio" as a permitted use, and approved a Zone Change request that amended the list of permitted uses, established by the [Q] Conditions, to allow a "Physical culture institution" (stationary cycling studio) as a permitted use not to exceed 873 square feet of the subject property. The property is zoned [Q]C2-1D and remains subject to the controls of Ordinance 168,334. This case involved an emerging use that was not present at the time the Ordinance was established in 1992, rather than a request to allow a use that was restricted by the Ordinance.

CPC-2013-924-ZC-CUB-MS: On October 24, 2014, the Central Area Planning Commission (APC) denied a request for a Zone Change, among other entitlement requests, to amend Ordinance No. 168,334 by deleting [Q] Condition No. 2(i) for the property located at 107 N. Larchmont Boulevard. The property is developed with a food establishment and has a Certificate of Occupancy for retail/take-out, not a restaurant. Granting the proposed zone change through removal of the [Q] Condition No. 2(i) would have applied to only this individual property in Subarea 2, which is not consistent with public necessity, convenience, general welfare and good zoning practice.

DISCUSSION

The applicant requested that the primary purpose of a food service establishment be determined based on the percentage of orders placed for take-out. However, the applicant's clarification cannot be applied to Ordinance No. 168,334, as the number of orders placed for take-out versus dine-in can fluctuate at any given time due to external factors, such as market demand, that are beyond the control of those responsible for enforcement of the Ordinance. Instead, [Q] Condition Number 2(i) is clarified to explain that the primary purpose is determined by the floor area allocated to the use of a food service establishment. If the majority of the floor area is dedicated to selling food to be consumed on the premises with seating, the primary use of the establishment is a restaurant. All food services establishments identified as a restaurant are subject to the limitations set forth in Ordinance No. 168,334.

Use of an Establishment Based on Parking Requirements

The LAMC Sections 12.21 A.4(c)(3), (4), and (5) differentiate types of establishments, including restaurants and retail, based on the square footage of an establishment and availability of seating for the purpose of calculating parking requirements. These are defined as follows:

(3) Restaurants and Bars, General: There shall be at least one automobile parking space for each 100 square feet of gross floor area included within the total square footage of any restaurant, cafe, coffee shop, tea room, fast food establishment, bar, night club, or any similar establishment, which dispenses food or refreshments or provides dancing or live entertainment. This requirement shall only apply to an establishment which has a gross floor area greater than 1,000 square feet. An establishment which provides no seating and exclusively dispenses food or refreshments to be eaten off the premises is not included in this definition and shall instead meet the requirement for general retail uses.

(4) *Restaurant, Small: If a restaurant, cafe, coffee shop, or other dining establishment has a gross floor area of 1,000 square feet or less, then it need provide only one automobile parking space for each 200 square feet of gross floor area. However, if such an establishment has a separate bar, or provides dancing or live entertainment, then additional parking shall be provided to meet the requirements for general restaurants set forth in Subparagraph (3) of this paragraph.*

(5) *Retail Stores, General: (Amended by Ord. No. 173,992, Eff. 7/6/01.) Retail establishments and discount wholesalers selling to the general public, shall provide at least four automobile parking spaces for each 1,000 square feet of gross floor area.*

Parking requirements for "*Restaurants and Bars, General*" apply to an establishment that has a gross floor area greater than 1,000 square feet, at one space for each 100 square feet of gross floor area included within the total square footage. Parking requirements for "*Restaurant, Small*" apply to a restaurant, café, coffee shop, or other dining establishment that has a gross floor area of 1,000 square feet or less, at one space for each 200 square feet of gross floor area at a minimum. LAMC Section 12.21 A.4(c)(5) identifies parking requirements for "*Retail Stores, General,*" to provide at least 4 spaces for each 1,000 square feet of gross floor area.

LAMC Section 12.21 A.4(c) explicitly defines a take-out establishment without seating as a retail use – "*An establishment which provides no seating and exclusively dispenses food or refreshments to be eaten off the premises . . . shall instead meet the requirement for general retail uses.*" Retail and take-out food establishments are required to provide a lower number of parking spaces, as retail uses would have higher parking turnover rate as they require less time in which any one parking space is occupied by the establishment's patrons.. Per the Zoning Engineer's Memorandum dated January 29, 1996, if a single business combines both restaurant and retail uses, the Department of Building and Safety calculates the parking requirement of each use separately even if there is no physical separation of the uses within the establishment.

Presence of Seating

As explained above, restaurant uses are distinguished from retail uses based on the availability of seating. The LAMC specifically distinguishes take-out food establishments from "*Restaurants and Bars, General*" and categorizes take-out food establishments as "*Retail Stores, General*" use, as Section 12.21 A.4(c)(3) states, "*An establishment which provides no seating and exclusively dispenses food or refreshments to be eaten off the premises is not included in this definition and shall instead meet the requirement for general retail uses.*" Therefore, food service establishments that sell food or refreshments for consumption off the premises may not provide seating. An establishment serving food or refreshments for consumption off the premises is deemed to function as a retail use and is not considered as a restaurant use, and therefore cannot have seating areas.

Primary Use of Building: Floor Area Allocation

When a food establishment contains both restaurant and retail uses, the primary use of a food establishment is determined by the floor area allocated to the uses. In such cases, the Certificate of Occupancy should indicate both uses as well as the primary use of the building. For example, if the majority of a café's floor area is dedicated to a restaurant use with seating area, then the café is operating primarily for the purpose of selling food to be consumed on the premises, and the primary use of the building on the Certificate of Occupancy would be a restaurant. The café would be subject to the limitation on restaurants per Ordinance No. 168,334. On the other hand, if the majority of the café's floor area is dedicated to the operation of a retail use selling food for off-premises consumption, the café is operating primarily for the purpose of selling food to be consumed off-premises, and the primary use of the building on the

Certificate of Occupancy would be retail or take-out establishment. The primary use is identified as a restaurant if the floor area dedicated to the restaurant use is greater than the floor area dedicated for the retail use.

Applicant's Request - Percentage of Orders Placed for Take-out

The applicant requests that [Q] Qualified Condition Number 2(i) be clarified to mean that if over 50 percent of customer orders are placed for take-out, such food service establishment is operating "primarily" for the purpose of off-premises consumption. The "Q" conditions represent regulations that must be enforceable by the Department of Building and Safety. It is not feasible to determine the primary use of a food establishment based on the percentage of orders placed for take-out, as the number of orders placed can fluctuate at any given time in response to external factors. The volatile nature of an establishment's customer base and the market would make enforcement of the Ordinance difficult. Furthermore, given the dynamic nature of market conditions, food establishments would continuously have to prove that their "use" has not changed by showing that the number of orders placed for take-out has not decreased over time and is higher than the number of orders placed for dine-in. Furthermore, new food establishments seeking a Certificate of Occupancy would not have a previous record of the number of orders placed, and would not be able to demonstrate what their primary use is without having a record of orders placed. Therefore, the applicant's clarification of "Q" Conditions to determine the primary purpose of a food service establishment based on the percentage of orders placed for take-out cannot be applied.

CLARIFICATION

The following is a Clarification of [Q] Condition Number 2(i) of the Ordinance No. 168,334:

The "primary purpose" of an establishment is determined based on the floor area dedicated to the use of the establishment. If the majority of the floor area is dedicated to selling food to be consumed on the premises with seating, the primary use of the establishment is a restaurant. All food services establishments that are considered a restaurant are subject to the limitations set forth in Ordinance No. 168,334.

Food services establishments that provide seating are considered sit-down restaurants. Food service establishments that do not provide seating and are operating for the purpose of selling food to be consumed off-premises have higher parking turnover rate than restaurants. They require less time in which any one parking space is occupied by the establishment's patrons and are required to meet parking requirements for general retail uses pursuant to LAMC Section 12.21 A.4(c)(3). Therefore, take-out food establishments without seating are considered a retail use and are excluded from the limitations set forth in Ordinance No. 168,334.

This clarification does not entitle properties subject to Ordinance No. 168,334 to any changes in their existing Certificate of Occupancy classification. All developments along Larchmont Boulevard between Beverly Boulevard and 1st Street will continue to be subject to the [Q] Qualified Conditions of Ordinance No. 168,334.

“Q” CLARIFICATION FINDINGS

Pursuant to Section 12.32 H of the Municipal Code and City Planning Commission Guidelines, I hereby find the following:

1. The request is consistent with the City Planning Commission Guidelines.

The City Planning Commission’s guidelines provide that an Amendment of the “T” Classification and Clarifications of the “Q” Classification or “D” Limitation may take place under certain circumstances, including:

“g. Clarification of any word or term used in a condition, when such term is not defined in the Municipal Code or the clarification of the intent of any condition that is ambiguous.”

The request for a clarification of the term “restaurant” in “Q” Qualified Condition No. 2(i) of Ordinance No. 168,334 conforms to Guideline “g” above. The Ordinance explicitly defines the term “restaurant.” The phrase “*operating primarily for the purpose of selling food to be consumed on- or off-premises*” differentiates sit-down dine-in restaurants from take-out food establishments. However, the applicant contends that the Ordinance is ambiguous regarding the meaning of the term “primary.” Additionally, the LAMC does not specifically define the term “restaurant” or “primarily” in Section 12.03. The clarification is intended to identify how the City determines an establishment’s primary purpose. Therefore, the request for a clarification is consistent with the City Planning Commission Guideline “g.”

2. The amendment or clarification is necessary in order to carry out the intent of the City Council in adopting the T or Q Classification or D Limitation.

The clarification of the term “restaurant” in “Q” Qualified Condition No. 2(i) in Ordinance No. 168,334, which limits the number of restaurants, is necessary in order to carry out the intent of the City Council. Larchmont Village is known as a unique neighborhood shopping district that contains a variety of uses. Following a Zone Change from C2-1VL to C1-1VL in 1988, certain neighborhood-oriented uses became non-conforming, and some uses, such as restaurants and financial service establishments, began to proliferate. In 1990, a Council Motion was introduced at the request of concerned community members and neighborhood associations. The intent of the Motion was to permit, encourage, and facilitate a balanced mix of pedestrian-oriented uses that best serve the neighborhood. The end result was Ordinance No. 168,334, which contains “Q” Qualified Conditions that are intended to protect and promote Larchmont Boulevard as a neighborhood-serving shopping district. All developments along Larchmont Boulevard between Beverly Boulevard and 1st Street are subject to the [Q] Qualified Conditions of Ordinance No. 168,334. These conditions were established to serve the intent of the City Council and the neighborhood community, which was to protect neighborhood-oriented uses, allow a balanced mix of uses, and preserve the Larchmont Village’s unique pedestrian-oriented shopping district within the Wilshire Community Plan area.

Section 12.32 G.2(b) of the LAMC defines the purpose of a “Q” Qualified Classification as a necessary action in order to (1) protect the best interest of and assure a development in harmony with the General Plan; and (3) prevent or mitigate potential adverse environmental effects of the zone change. In 1992, the Larchmont community supported the adoption of permanent “Q” Qualified Conditions as necessary to protect the best interests of the neighborhood and to assure diversity in the businesses established in the area. Ordinance No. 168,334 expressly identifies permitted uses and limits restaurants and financially-oriented services located at the ground floor, in order to protect the pedestrian and neighborhood

orientation of the shopping district. The clarification of the term “restaurant” and the phrase “primarily for the purpose of selling food to be consumed off-premises” in “Q” Qualified Condition No. 2(i) is a necessary action in order to continuously observe the City Council's as well as the community's intent to preserve Larchmont Village as a unique locally-oriented shopping area that promotes a pedestrian friendly environment.

3. The amendment or clarification would have only a minimal effect on adjacent property and would not result in a significant or substantial deprivation of the property rights of other property owners.

The clarification of the term “restaurant” in [Q] Qualified Condition No. 2(i) of Ordinance No. 168,334 would not have an effect on adjacent properties. The clarification is meant to explain the term “restaurant” and the phrase “primarily for the purpose of selling food to be consumed off-premises,” which is used to differentiate take-out food establishments from sit-down dine-in restaurants. The applicant requests a clarification of the Ordinance to mean that the primary purpose of an establishment is determined by the percentage of orders placed for take-out. Due to the volatility of the economy and the market demand, the applicant's clarification cannot be applied to the Ordinance. The Ordinance is clarified to mean that food service establishments that do not provide seating and are subject to the parking requirements for a general retail use, pursuant to LAMC Section 12.21 A.4(c)(3), are considered take-out establishments. These take-out establishments without seating are excluded from the limitations set forth in the Ordinance. On the other hand, food establishments that provide seating are considered sit-down restaurants. The primary purpose of a food service establishment is determined based on the floor area allocated to the use. If a majority of the floor area of an establishment is allocated to the restaurant use with seating, the primary use is a restaurant. All food service establishments that are considered a restaurant use are subject to the limitations set forth in the Ordinance.

The clarification does not increase building footprint, height, or floor area of any properties in Subarea 2. Furthermore, the clarification would not result in a significant or substantial deprivation of the property rights of other property owners. This clarification does not entitle properties subject to Ordinance No. 168,334 to any changes in their existing Certificate of Occupancy classification. All developments along Larchmont Boulevard between Beverly Boulevard and 1st Street will continue to be subject to the [Q] Qualified Conditions. Therefore, the clarification would not result in a significant or substantial deprivation of the rights of other property owners. Any change to the Ordinance language, would require an Amendment to the Ordinance, which is a legislative action. This Director's Determination does not have the authority to make actual changes to Ordinance No. 168,334.

ENVIRONMENTAL FINDINGS

The Director of Planning has determined that the project is categorically exempt from environmental review pursuant to Article III Section 1 Class 5 Category 11 of the City of Los Angeles California Environmental Quality Act (CEQA) Guidelines, as the project qualifies for the Department of Building and Safety Orders and Zoning Administrator Interpretations and appeals therefrom which do not result in change in land use or additional dwelling units.

APPEAL PERIOD - EFFECTIVE DATE

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

The Determination in this matter will become effective and final twenty (20) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at www.lacity.org/pln.

Planning Department public offices are located at:

*Downtown Office
Figueroa Plaza
201 North Figueroa Street, 4th Floor
Los Angeles, CA 90012
(213) 482-7077*

*Valley Office
6262 Van Nuys Boulevard, Suite 251
Van Nuys, CA 91401
(818) 374-5050*

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Building in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either by calling (213) 482-7077 or through the Department of City Planning website at <http://cityplanning.lacity.org>. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

Michael J. LoGrande
Director of Planning


Approved by:


Shana Bonstin, Principal City Planner

Reviewed by:


Debbie Lawrence, AICP, City Planner

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