

**Findings for a Waiver of Dedication or Improvements for 60 Market JV, LLC (Babak Ziai)  
(52 Market Street, Los Angeles, CA 90291)**

**Project Background**

The proposed Project has 30 feet of linear frontage along Market Street between Pacific Avenue and Speedway Alley. It includes a 282 SF addition to the ground floor and 200 SF addition to the second floor of an existing residential building, a new proposed ground floor cafe/restaurant, and a restoration of the historic Market Street arcade in the public right of way.

According to the City's most recent mobility planning element, Mobility Plan 2035, Market Street is classified as a Local Street - Standard and required to maintain a public right of way of 60 feet in width with a roadway of 36 feet (18-foot half roadway). Currently, the street is improved with a 45-foot right of way, including a 28-foot roadway and 8.5 feet devoted to sidewalk and curb improvements. The Preliminary Land Use Report recommends a 7.5-foot dedication, which would include a potential 4-foot road widening.

Pursuant to LAMC Section 12.37, the Director may waive, reduce or modify the required dedication or improvement as appropriate after making any of the following findings, based on substantial evidence in the record that:

**1. The dedication or improvement requirement does not bear a reasonable relationship to any project impact.**

The scope of the proposed Project does not bear a proportional relationship to the Bureau of Engineering's street widening requirement to expand the half roadway to a width of 18 feet along the frontage of the property. The subject property is located in a historic area of Venice, adjacent to both Venice Beach and Ocean Front Walk. Visitors to the area generally do not come to patronize one specific establishment, but rather to have access to all of the recreational amenities the area offers.

The Project is located in an AB 2097-eligible zone, which allows for the provision of zero automobile parking spaces, in an effort to encourage car-free and car-light living, and further the City of Los Angeles' mobility and sustainability goals. The Project's provision of zero automobile parking spaces and its short-term bicycle parking spaces are meant to encourage less single-occupancy vehicle use, and more active and public transportation use in alignment with the goals of the Mobility 2035 Plan to promote sustainability and safety.

Therefore, it is not expected that the Project's particular use will generate additional vehicular traffic to necessitate such a road widening.

**2. The dedication or improvement is not necessary to meet the City's mobility needs for the next 20 years based on guidelines the Street Standards Committee has established.**

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Widening the half-roadway along Market Street is not necessary to meet the City's mobility needs for the next 20 years based on guidelines the Street Standards Committee has established. Great Streets for Los Angeles: Complete Streets Design Guide is published by the City of Los Angeles and intended to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets. The Guide defines a "Local Street Standard" in the following way: "Local streets have one lane in each direction and have parking on both sides of the street." Since the street ends at Ocean Front Walk, and does not connect directly through to the other side of Pacific Avenue, this portion of Market Street effectively behaves more like a Local Street Limited. Additionally, because much of this block is occupied by an al fresco dining area on the south side of the street, and the Project plans include even more frontage dedicated to al fresco dining, it is not accurate to describe Market St as having parking on both sides of the street.

The inclusion of a spot widening on Market Street is not necessary, and spot widening in general is now seen to be harmful for various reasons outlined by the Los Angeles City Council. In March of 2023, the Los Angeles City Council adopted a motion to have the Bureau of Engineering (BOE), Department of City Planning (DCP), the Department of Transportation (LADOT), DCP's Urban Design Studio, and other relevant departments, report back with recommendations to "eliminate spot road widenings." The justification for the motion states that "City standards for street widths based on street classification frequently result in widenings even when a WDI would have been desirable. These spot widenings often create incoherent streets that degrade neighborhood character, undermine active transportation, reduce tree canopy, and expand impermeable surface area—all contrary to the City's mobility and sustainability goals."

Additionally, the City's Mobility 2035 Plan identifies Ocean Front Walk and Pacific Avenue—both adjacent to the subject property—as *Pedestrian Enhanced Districts*. These are areas meant to encourage pedestrian safety and vibrant street life, and the widening of the roadway along Market Street does not support these goals.

Finally, there is historic precedent for maintaining a 45-foot roadway along Market Street. On page 6 of *Exhibit A - 1990 Letter from the Venice Historical Society*, the Historical Society includes as part of its recommendation for the Venice LUP a passage stating

"Market Street from Pacific Avenue to Ocean Front Walk shall be designated as 45 feet wide from property line to property line, with the arcade permitted to extend into the 45-foot width on the south side ..."

This precedent, along with the other stated characteristics of Market Street, as well as the adopted proposal to change the default in Los Angeles to no longer automatically widen streets, cement the idea the road widening along Market Street is not necessary and not in line with the City's mobility goals for the next 20 years.

**3. The dedication or improvement requirement is physically impractical.**

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The recommended spot widening of Market Street to a half-roadway width of 18 feet is physically impractical. There are currently no other portions of the block which have been widened, and a widening of the roadway, which would cause the sidewalk and parkway to be narrowed, would amount to incoherence and a degraded pedestrian experience. Furthermore, the Project seeks to recreate the historic Market Street arcade, and a widening of the road along the frontage of this property would make for an architecturally awkward and disjointed arcade.

The adjacent properties at 74-76 E Market St are also listed on Survey LA as historic resources, and therefore would likely never be redeveloped to include the dedication and road widening, so widening the road just along the frontage of the subject property is not practical.

Additionally, the Project proposes an al fresco dining area, similar to that of the restaurant located next to the subject property, at 64 Market Street. Again, a road widening along the frontage of the property would not be practical, as this part of the roadway is planned for the Project's outdoor dining area.