



PAUL KREKORIAN

COUNCILMEMBER • DISTRICT 2

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September 14, 2017

David H. Ambroz
President, City Planning Commission
200 North Main Street
Los Angeles, CA 90012

Re: Requested Changes to Cannabis Zoning Regulations, CPC-2017-2260-CA

Dear President Ambroz:

As the City of Los Angeles discusses the draft ordinance that would establish location restrictions for commercial cannabis activity, I want to make the most of this opportunity to put forward appropriate recommendations that are both consistent with Measure M and maximize public safety and maintain a high quality of life in our residential communities.

In this vein, I request that the City Planning Commission make the following changes to the proposed cannabis zoning regulations currently before it.

- I. **Require all retail establishments to apply for a land use review with a Conditional Use Permit (CUP)**, so that the city can establish fully enforceable conditions that would run with the land. The City Planning Commission shall delegate its authority to the Cannabis Commission to issue the CUPs. This land use review shall be conducted concurrently with the other approvals of the commission, allowing a more streamlined process.
- II. **Require design guidelines and standards:** the City Planning Commission shall delegate its authority to the Cannabis Commission and the Cannabis Regulation Department to issue a Project Permit Compliance of the design guidelines that shall include, but not be limited to:
 - a. Requiring compliance to the fullest extent to the Commercial Citywide Design Guidelines for retail and micro-business establishments, and compliance with the Industrial Citywide Design Guidelines for non-retail establishments.

- b. Requiring that the colors, textures, materials, design and articulation of the façade of the building conform with and complement the existing community and business facades.
- c. Treating all façades of the building with equal architectural rigor, including level of detail and articulation.
- d. Using exterior surface materials that will reduce the incidence and appearance of graffiti, encouraging climbing vegetation and green walls as a method to provide articulation and visual interest to building facades.
- e. Prohibiting exterior mounted devices, including security bars, grates, grills, barricades and similar devices.
- f. Prohibiting the use of wrought iron spears and barbed wire (cyclone) on the property.
- g. Prohibiting drive-thru lanes and pick-up windows.
- h. Requiring windows that front adjacent streets for retail and micro-business establishments shall consist of at least 50 percent transparent windows, and provide a clear and unobstructed view free of reflective coatings. This will allow for a visual connection with the interior and provide better security and aesthetics.
- i. Requiring screening on all rooftop equipment, such as air conditioning units, ventilation equipment and mechanical equipment.
- j. Requiring all portions of the cannabis business, including its parking areas and driveways fronting a public right of way to comply with LAMC section 12.37, Highway Dedication Procedures, to repair or replace broken and off-grade sidewalks, close unused driveways, plant street trees and more. If a building is erected or enlarged, or if the cannabis business is 50 percent or more of the floor area of the structures on the lot, then this requirement shall apply to the entire property, per section 12.37.
- k. Establishing clear and complete sign regulations, including the following:
 - i. Signs shall be limited to one sign per street frontage displaying the name and/or logogram of the business on the premise upon which the business is located. The total sign area of signs facing a street shall not exceed two square feet for each linear foot of building frontage and no sign shall exceed a maximum of 75 square feet.
 - ii. In addition to the one allowed sign per street frontage, the following signs shall be allowed:
 - 1. Only one (maximum two faces) existing pole or monument sign shall be permitted as long as the sign structure was permitted prior to Jan. 1, 2017, and shall only be allowed to display the name and/or logogram of the business on the premises upon which the business is located. No new pole or monument signs shall be allowed.

- iii. Signage on windows and doors at a maximum total area shall not exceed 64 square inches in area.
- iv. One awning sign, as allowed pursuant to Section 91.4506(f) of the code shall be permitted per awning.
- v. Signs required by law, or required or recommended by a government agency or utility company.
- vi. Signs identifying a security company, limited to 30 square inches.
- l. Prohibiting signs with any of the following characteristics:
 - i. Any signs with a message that contains more than the name, the logogram of the business, the business address, hours of operation, and the contact information of the business (limited to the name, phone number, email address, social medial accounts and website). No product advertisement shall be allowed on signage visible from the public right of way. Signage required by or recommended by any government entity shall be excluded from this prohibition.
 - ii. Windblown devices, pennants, flags, banners, posters, streamers, ribbons, spinners, festoons, and other attention attracting displays.
 - iii. Roof signs.
 - iv. Portable signs or sandwich signs located in the public right-of-way.
 - v. Temporary signs within the meaning of Section 91.6215 of the code.
 - vi. Signs having flashing, mechanical, strobe or blinking lights or moving parts.
 - vii. Digital signs.
 - viii. Moving signs or signs with any rotating or moving parts which give the appearance or impression of movement, and blinking and flashing signs.
 - ix. Super graphic Displays.

III. Restrict cannabis activity in A-zones: I oppose any and all cannabis activity in A-zones.

- a. If cannabis activity is to be allowed in A-zones, it should only be allowed on property that has an existing agricultural use with a Certificate of Occupancy or permits for agricultural activity prior to Jan. 1, 2017.
- b. Absolutely no cannabis activity shall be allowed in A-zones that are in very high fire hazard severity zones.

Thank you in advance for considering my recommended changes. I believe these will greatly improve the ordinance before you by adding guidance for businesses and much-needed protections for the communities in which these businesses will operate. Also, please know that my interest in getting this policy right starts with zoning, but is not

limited to it. When the time comes for the City Council to review the non-zoning related cannabis items, I will contribute additional recommendations to that discussion as well.

If you have additional questions or need additional clarification of any of the above points, please feel free to contact Karo Torossian, my Director of Planning and the Environment, at karo.torossian@lacity.org or (213) 473-7002.

Very truly yours,



PAUL KREKORIAN
Councilmember, Second District

cc: Director of Planning Vince Bertoni
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