

Master Land Use Application ZA-2018-3271-MCUP-CUX-SPPA-SPP^{1, 2, 3}

¹ Updated Project Description and Findings dated September 2020 supersede project information on Master Land Use Application form.

² Master Land Use Application will be updated to be consistent with current entitlements and proposed land uses, which include new construction of up to 1,269,150 square feet of mixed-use development comprising 180 residential for-sale condominium units; 252 residential apartments; two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses.

³ All project plans, entitlement requests, and environmental analysis reflect the current land uses and entitlements associated with the Project.



APPLICATIONS:

DEPARTMENT OF CITY PLANNING APPLICATION

THIS BOX FOR CITY PLANNING STAFF USE ONLY

Case Number

ZA-2018-3271-MCUP-CUX-SPPA-SPP

Env. Case Number

Application Type

Case Filed With (Print Name)

Date Filed

Application includes letter requesting:

☐ Waived hearing☐ Concurrent hearing☐ Hearing not be scheduled on a specific date (e.g. vacation hold)

Related Case Number

Provide all information requested. Missing, incomplete or inconsistent information will cause delays.*All terms in this document are applicable to the singular as well as the plural forms of such terms.**Detailed filing instructions are found on form CP-7810***1. PROJECT LOCATION**Street Address¹ 326-358 S. Olive St.; 351-361 S. Hill St.; 417-425 W. 4th St. Unit/Space Number _____Legal Description² (Lot, Block, Tract) Lot 5, Tract 30781Assessor Parcel Number 5149-010-939 Total Lot Area 97,643 SF**2. PROJECT DESCRIPTION**Present Use Vacant lot, LA Metro station portalProposed Use Mixed-use residential, commercial, hotel, schoolProject Name (if applicable) Angels LandingDescribe in detail the characteristics, scope and/or operation of the proposed project New construction of up to1,269,359 SF of new mixed-use development. Project includes: 120 for-sale condos, 450 for-rent apartments,480 hotel guestrooms, 43,185 SF charter school and 46,923 SF commercial space.Additional information attached ☒ YES ☐ NO

Complete and check all that apply:

Existing Site Conditions☒ Site is undeveloped or unimproved (i.e. vacant)☐ Site is located within 500 feet of a freeway or railroad☐ Site has existing buildings (provide copies of building permits)☐ Site is located within 500 feet of a sensitive use (e.g. school, park)¹ Street Addresses must include all addresses on the subject/application site (as identified in ZIMAS—<http://zimas.lacity.org>)² Legal Description must include all contiguously owned properties (even if they are not a part of the proposed project site)

- ☐ Site has special designation (e.g. National Historic Register, Survey LA)

☐ Removal of protected trees on site or in the public right of way

☒ New construction: up to 1,269,359 square feet

- ☐ Accessory use (fence, sign, wireless, carport, etc.)
- ☐ Exterior renovation or alteration
- ☒ Change of use and/or hours of operation
- ☒ Haul Route
- ☐ Uses or structures in public right-of-way
- ☐ Phased project

Number of Residential Units:	Existing	<u>0</u>	- Demolish(ed) ³	<u>0</u>	+ Adding	<u>570</u>	= Total	<u>570</u>
Number of Affordable Units ⁴	Existing	<u>0</u>	- Demolish(ed)	<u>0</u>	+ Adding	<u>TBD</u>	= Total	<u>TBD</u>
Number of Market Rate Units	Existing	<u>0</u>	- Demolish(ed)	<u>0</u>	+ Adding	<u>570</u>	= Total	<u>570</u>
Mixed Use Projects, Amount of <u>Non-Residential</u> Floor Area: <u>approx. 540,469</u> square feet								

Have you submitted the Planning Case Referral Form to BOE? (required) ☒ YES ☐ NO

Is your project required to dedicate land to the public right-of-way? ☐ YES ☒ NO

If so, what is/are your dedication requirement(s)? _____ ft.

If you have dedication requirements on multiple streets, please indicate: _____

Provide the Los Angeles Municipal Code (LAMC) Section that authorizes the request and (if applicable) the LAMC Section or the Specific Plan/Overlay Section from which relief is sought; follow with a description of the requested action.

Does the project include Multiple Approval Requests per LAMC 12.36? ☒ YES ☐ NO

Authorizing Code Section See Attachment "A"

Code Section from which relief is requested (if any): _____

Action Requested, Narrative: _____

Authorizing Code Section _____

Code Section from which relief is requested (if any): _____

Action Requested, Narrative: _____

Additional Requests Attached ☒ YES ☐ NO

³ Number of units to be demolished and/or which have been demolished within the last five (5) years.

⁴ As determined by the Housing and Community Investment Department

4. RELATED DEPARTMENT OF CITY PLANNING CASES

Are there previous or pending cases/decisions/environmental clearances on the project site? ☐ YES ☒ NO

If YES, list all case number(s) _____

If the application/project is directly related to one of the above cases, list the pertinent case numbers below and complete/check all that apply (provide copy).

Case No. _____

Ordinance No.: _____

☐ Condition compliance review

☐ Clarification of Q (Qualified) classification

☐ Modification of conditions

☐ Clarification of D (Development Limitations) classification

☐ Revision of approved plans

☐ Amendment to T (Tentative) classification

☐ Renewal of entitlement

☐ Plan Approval subsequent to Master Conditional Use

For purposes of environmental (CEQA) analysis, is there intent to develop a larger project? ☐ YES ☒ NO

Have you filed, or is there intent to file, a Subdivision with this project? ☒ YES ☐ NO

If YES, to either of the above, describe the other parts of the projects or the larger project below, whether or not currently filed with the City:

A Vesting Tentative Tract Map application may be filed at a later date.

5. RELATED DOCUMENTS / REFERRALS

To help assigned staff coordinate with other Departments that may have a role in the proposed project, please provide a copy of any applicable form and reference number if known.

a. Specialized Requirement Form N/A

b. Geographic Project Planning Referral Attached

c. Citywide Urban Design Guidelines Checklist Attached

d. Affordable Housing Referral Form N/A

e. Mello Form N/A

f. Unpermitted Dwelling Unit (UDU) Inter-Agency Referral Form N/A

g. HPOZ Authorization Form N/A

h. Management Team Authorization N/A

i. Expedite Fee Agreement N/A

j. Department of Transportation (DOT) Referral Form To be submitted after application filing

k. Bureau of Engineering (BOE) Planning Case Referral Form (PCRF) Attached

l. Order to Comply N/A

m. Building Permits and Certificates of Occupancy Attached

n. Hillside Referral Form N/A

o. Low Impact Development (LID) Referral Form (Storm water Mitigation) Attached

p. Proof of Filing with the Housing and Community Investment Department N/A

q. Are there any recorded Covenants, affidavits or easements on this property? ☒ YES (provide copy) ☐ NO

PROJECT TEAM INFORMATION (Complete all applicable fields)

Applicant⁵ name Angels Landing Partners, LLC, a Delaware limited liability company

Company/Firm c/o The Peebles Corporation

Address: 2020 Ponce De Leon Boulevard Unit/Space Number 907

City Coral Gables State Florida Zip Code: 33134

Telephone (212) 266-0045 E-mail: gpcola@peeblescorp.com

Are you in escrow to purchase the subject property? ☐ YES ☒ NO

Property Owner of Record ☐ Same as applicant ☒ Different from applicant

Name (if different from applicant) CRA/LA, a Designated Local Authority

Address 448 South Hill Street Unit/Space Number 1200

City Los Angeles State California Zip Code: 90013

Telephone _____ E-mail: _____

Agent/Representative name James E. Pugh, Esq.

Company/Firm Sheppard Mullin Richter & Hampton, LLP

Address: 333 South Hope Street, 43rd Floor Unit/Space Number _____

City Los Angeles State California Zip: 90071

Telephone (213) 617-4284 E-mail: jpugh@sheppardmullin.com

Other (Specify Architect, Engineer, CEQA Consultant etc.) _____

Name James Hakes, AiA, NCARB

Company/Firm Handel Architects LLP

Address: 735 Market Street, 2nd Floor Unit/Space Number _____

City San Francisco State California Zip Code: 94103

Telephone (415) 495-5588 E-mail: jhakes@handelarchitects.com

Primary Contact for Project Information
(select only one)

☐ Owner

☐ Applicant

☒ Agent/Representative

☐ Other

To ensure notification of any public hearing as well as decisions on the project, make sure to include an individual mailing label for each member of the project team in both the Property Owners List, and the Abutting Property Owners List.

⁵ An applicant is a person with a lasting interest in the completed project such as the property owner or a lessee/user of a project. An applicant is not someone filing the case on behalf of a client (i.e. usually not the agent/representative).

PROPERTY OWNER

7. **PROPERTY OWNER AFFIDAVIT.** Before the application can be accepted, the owner of each property involved must provide a notarized signature to verify the application is being filed with their knowledge. Staff will confirm ownership based on the records of the City Engineer or County Assessor. In the case of partnerships, corporations, LLCs or trusts the agent for service of process or an officer of the ownership entity so authorized may sign as stipulated below.

- **Ownership Disclosure.** If the property is owned by a partnership, corporation, LLC or trust, a disclosure identifying the agent for service of process or an officer of the ownership entity must be submitted. The disclosure must list the names and addresses of the principal owners (25% interest or greater). The signatory must appear in this list of names. A letter of authorization, as described below, may be submitted provided the signatory of the letter is included in the Ownership Disclosure. Include a copy of the current partnership agreement, corporate articles, or trust document as applicable.
- **Letter of Authorization (LOA).** A LOA from a property owner granting someone else permission to sign the application form may be provided if the property is owned by a partnership, corporation, LLC or trust or in rare circumstances when an individual property owner is unable to sign the application form. To be considered for acceptance, the LOA must indicate the name of the person being authorized to file, their relationship to the owner or project, the site address, a general description of the type of application being filed and must also include the language in items A-D below. In the case of partnerships, corporations, LLCs or trusts the LOA must be signed and notarized by the authorized signatory as shown on the Ownership Disclosure or in the case of private ownership by the property owner. Proof of Ownership for the signatory of the LOA must be submitted with said letter.
- **Grant Deed.** Provide a Copy of the Grant Deed If the ownership of the property does not match City Records and/or if the application is for a Coastal Development Permit. The Deed must correspond exactly with the ownership listed on the application.
- **Multiple Owners.** If the property is owned by more than one individual (e.g. John and Jane Doe or Mary Smith and Mark Jones) notarized signatures are required of all owners.

- a. I hereby certify that I am the owner of record of the herein previously described property located in the City of Los Angeles which is involved in this application or have been empowered to sign as the owner on behalf of a partnership, corporation, LLC or trust as evidenced by the documents attached hereto.
- b. I hereby consent to the filing of this application on my property for processing by the Department of City Planning.
- c. I understand if the application is approved, as a part of the process the City will apply conditions of approval which may be my responsibility to satisfy including, but not limited to, recording the decision and all conditions in the County Deed Records for the property.
- d. By my signature below, I declare under penalty of perjury under the laws of the State of California that the foregoing statements are true and correct.

*Property Owner's signatures must be signed/notarized in the presence of a Notary Public.
The City requires an original signature from the property owner with the "wet" notary stamp.
A Notary Acknowledgement is available for your convenience on following page.*

Signature _____

James E. Pugh

Date _____

JUNE 6, 2018

Print Name _____

JAMES E. PUGH

Signature _____

Date _____

Print Name _____

Space Below For Notary's Use

California All-Purpose Acknowledgement

Civil Code ' 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

On June 6, 2018 before me, Susie Navarro, Notary Public
(Insert Name of Notary Public and Title)

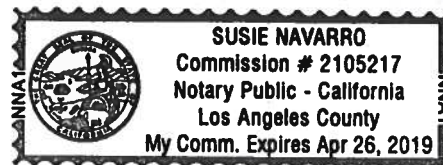
personally appeared James E. Pugh, who
proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) ~~is~~ are subscribed to the within
instrument and acknowledged to me that ~~he~~ she ~~they~~ executed the same in ~~his~~ her ~~their~~ authorized capacity(ies), and that
by ~~his~~ her ~~their~~ signature(s) on the instrument the person(s), or the entity upon behalf on which the person(s) acted,
executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Susie Navarro
Signature

(Seal)



APPLICANT

8. **APPLICANT DECLARATION.** A separate signature from the applicant, whether they are the property owner or not, attesting to the following, is required before the application can be accepted.
- a. I hereby certify that the information provided in this application, including plans and other attachments, is accurate and correct to the best of my knowledge. Furthermore, should the stated information be found false or insufficient to fulfill the requirements of the Department of City Planning, I agree to revise the information as appropriate.
 - b. I hereby certify that I have fully informed the City of the nature of the project for purposes of the California Environmental Quality Act (CEQA) and have not submitted this application with the intention of segmenting a larger project in violation of CEQA. I understand that should the City determine that the project is part of a larger project for purposes of CEQA, the City may revoke any approvals and/or stay any subsequent entitlements or permits (including certificates of occupancy) until a full and complete CEQA analysis is reviewed and appropriate CEQA clearance is adopted or certified.
 - c. I understand that the environmental review associated with this application is preliminary, and that after further evaluation, additional reports, studies, applications and/or fees may be required.
 - d. I understand and agree that any report, study, map or other information submitted to the City in furtherance of this application will be treated by the City as public records which may be reviewed by any person and if requested, that a copy will be provided by the City to any person upon the payment of its direct costs of duplication.
 - e. I understand that the burden of proof to substantiate the request is the responsibility of the applicant. Additionally, I understand that planning staff are not permitted to assist the applicant or opponents of the project in preparing arguments for or against a request.
 - f. I understand that there is no guarantee, expressed or implied, that any permit or application will be granted. I understand that each matter must be carefully evaluated and that the resulting recommendation or decision may be contrary to a position taken or implied in any preliminary discussions.
 - g. I understand that if this application is denied, there is no refund of fees paid.
 - i. I understand and agree to defend, indemnify, and hold harmless, the City, its officers, agents, employees, and volunteers (collectively "City"), from any and all legal actions, claims, or proceedings (including administrative or alternative dispute resolution (collectively "actions"), arising out of any City process or approval prompted by this Action, either in whole or in part. Such actions include but are not limited to: actions to attack, set aside, void, or otherwise modify, an entitlement approval, environmental review, or subsequent permit decision; actions for personal or property damage; actions based on an allegation of an unlawful pattern and practice; inverse condemnation actions; and civil rights or an action based on the protected status of the petitioner or claimant under state or federal law (e.g. ADA or Unruh Act). I understand and agree to reimburse the City for any and all costs incurred in defense of such actions. This includes, but it not limited to, the payment of all court costs and attorneys' fees, all judgments or awards, damages, and settlement costs. The indemnity language in this paragraph is intended to be interpreted to the broadest extent permitted by law and shall be in addition to any other indemnification language agreed to by the applicant.
 - i. By my signature below, I declare under penalty of perjury, under the laws of the State of California, that all statements contained in this application and any accompanying documents are true and correct, with full knowledge that all statements made in this application are subject to investigation and that any false or dishonest answer to any question may be grounds for denial or subsequent revocation of license or permit.

The City requires an original signature from the applicant. The applicant's signature below does not need to be notarized.

Signature: _____

Date: _____

Print Name: _____

**Attachment "A" to Master Land Use Application
Angles Landing**

I. INTRODUCTION & PROJECT TEAM

Angels Landing Partners, LLC (the "Applicant") is a joint venture between The Peebles Corporation¹, MacFarlane Partners² and Claridge Properties³ (the "Development Team"). The joint venture was formed to respond to a Request for Qualifications and subsequent Request for Proposals (the "RFP") issued by the City of Los Angeles (the "City") to redevelop an approximately 97,631 square-foot parcel (approx. 2.24 acres) of vacant land located at 332, 350, and 358 South Olive Street; 351 and 361 South Hill Street; and 417 and 425 West 4th Street (the "Site").

Together, the Development Team has an outstanding track record of successful and innovative developments of residential, commercial and mixed-use projects across the United States. On December 13, 2017, the City Council approved the Development Team as the preferred developer of the Site. Pursuant to an Exclusive Negotiating Agreement between the Applicant and the City, the Applicant is required to apply for all necessary entitlements for its proposed development.

The Development Team has organized a team of top tier professionals and consultants with local expertise, including Handel Architects, OLIN Landscape Architects, KPFF Civil Engineers, Eyestone Environmental, SBE Group, and Sheppard Mullin Richter & Hampton.

This Attachment "A" supplements the information in Applicant's Master Land Use Application and provides the legal findings and justifications for the requested entitlements.

II. ACTIONS REQUESTED

A. Project Permit Compliance

Pursuant to Los Angeles Municipal Code ("LAMC") Section 11.5.7.C and the Bunker Hill Specific Plan (the "Specific Plan") Section 6.B, the Applicant requests Project Permit Compliance approval that the Project (defined below) conforms to the requirements of the Specific Plan. The findings and justification for Project Permit Compliance approval are set forth in Section IV.A, below.

¹ www.peeblescorp.com

² www.macfarlanepartners.com

³ www.claridgeprop.com

B. Master Conditional Use Permit to Permit the Sale and Dispensing of alcoholic beverages for on- and off-site consumption

Pursuant to LAMC Section 12.24.W.1, the Applicant requests a Master Conditional Use Permit ("MCUP") to permit the on- and off-site sale and dispensing of a full line of alcoholic beverages for the following tenant spaces:

Tenant Space	Use	Size	Seat Count*	License Type(s)**	On- or Off-Site
1	Café	1,047 SF	47	47	On-site
2	Restaurant/Retail	6,948 SF	309	47/21	On-site/off-site
3	Retail	4,964 SF	n/a	21	Off-site
4	Retail	1,833 SF	n/a	21	Off-site
5	Restaurant/Retail	4,327 SF	194	47/21	On-site/off-site
6	Retail	1,265 SF	n/a	21	Off-site
7	Retail	2,591 SF	n/a	21	Off-site
8	Restaurant/Retail	3,789 SF	168	47/21	On-site/off-site
9	Retail	1,866 SF	n/a	21	Off-site
10	Restaurant/Retail	4,339 SF	193	47/21	On-site/off-site
11	Retail	1,416 SF	n/a	21	Off-site
12	Retail	2,444 SF	n/a	21	Off-site
13	Restaurant/Retail	21,999 SF	566	47/21	On-site/off-site
14	Restaurant/Retail	4,308 SF	115	47/21	On-site/off-site
15	Restaurant/Retail	9,711 SF	259	47/21	On-site/off-site
	Hotel A	230,245 SF		47 and 66	On-site
	Hotel B	239,872 SF		47 and 66	On-site

*Seat count is provided for conceptual purposes only. Final seat count and tenant layout will be determined by the future tenant/operator and provided for City review as part of a future Plan Approval application.

** [ABC License Types](#) include:

Type 47 – On Sale General – Eating Place - (Restaurant) Authorizes the sale of beer, wine and distilled spirits for consumption on the licenses premises. Authorizes the sale of beer and wine for consumption off the licenses premises. Must operate and maintain the licensed premises as a bona fide eating place. Must maintain suitable kitchen facilities, and must make actual and substantial sales of meals for consumption on the premises. Minors are allowed on the premises.

Type 21 – Off-Sale General - (Package Store) Authorizes the sale of beer, wine and distilled spirits for consumption off the premises where sold. Minors are allowed on the premises.

Type 66 – Controlled Access Cabinet Permits - These permits are issued to licensed hotels or motels and allow for the sale of packaged distilled spirits in guestrooms. The distilled spirits sold pursuant to these permits shall be in containers of 50 milliliters or less and must be secured in a locked cabinet.

As described in more detail below, the Project will feature a mix of uses, including retail, hotels and restaurants/bars. The MCUP will permit the sale of alcoholic beverages as an amenity to these individual uses. The findings and justification for this request are set forth in Section IV.B, below.

C. Conditional Use Permit to Permit Live Entertainment and Dancing

Pursuant to LAMC Section 12.24.W.18, the Applicant requests a Conditional Use Permit to permit live entertainment and dancing at the Project. SBE Group⁴, a global lifestyle hotel and entertainment brand, has proposed two hotels in the Project – The Mondrian and SLS Hotel. This request will permit live music and dancing in connection with the hotel, restaurant and bar uses within the Project. The legal findings and justification for this request are set forth in Section IV.C, below.

D. Director's Determination for Alternative Design

Pursuant to Section 6.C of the Specific Plan, the Applicant requests a Director's Determination for Alternative Design to permit the deviation from certain aspects of the urban design regulations set forth in Section 8 of the Specific Plan, including, without limitation, the retail street requirements on Olive and 4th. The required legal findings and justification for this request are set forth in Section IV.D, below.

E. Vesting Tentative Tract Map

Vesting Tentative Tract Map (VTTM) – Merger and re-subdivision of one lot into one ground lot and multiple airspace lots for residential, hotel, and commercial purposes, subject to LAMC § 17.15.

F. Development Agreement

Pursuant to California Government Code Section 65864 *et. seq.* and LAMC Section 12.32, the Applicant requests a Development Agreement to lock in the project approvals, laws, rules and regulations in effect as of the date the Development Agreement becomes effective.

G. Other Permits and Approvals as may be Necessary or Required for the Development of the Project

For a development of this scale, there may be other permits or approvals from the City that may be required, but which do not require the submittal of an application to the Department of City Planning at this time. The Applicant and Development Team are committed to working with City staff to timely submit and process any additional applications, permits or approvals that may be necessary or required for the development of the Project. These additional future approvals and permits may include, without limitation, (i) approval of a haul route, (ii) an encroachment permit, (iii) a permit authorizing the removal of street trees and (iv) a vesting tentative tract map.

Development of the Project would also include other potential agreements by and between the current owner CRA/LA, the City of Los Angeles, Metro and/or the Applicant, including, but not limited to: (i) Purchase and Sale Agreement by and between CRA/LA and the City of Los Angeles; (ii) Purchase and Sale Agreement by and between City of Los Angeles and the Applicant; (iii) Disposition and Development Agreement by and between CRA/LA and the Applicant; (iv) Hotel Development Incentive Agreement by and between the City of Los Angeles

⁴ www.sbe.com.

and the Applicant; and (v) Amendment to the Construction, Operation and Reciprocal Easement Agreement by and between the CRA/LA and Bunker Hill Associates dated August 26, 1983.

III. PROJECT DESCRIPTION

A. Project Summary

The Applicant proposes to develop the Site as a two tower mixed-use development consisting of: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units, with affordable housing comprising five percent of the total for-rent units (13 units)); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. The proposed uses would be distributed throughout a series of terraced levels in a podium structure and two towers (Tower A and Tower B) that would be constructed above a three-level subterranean parking garage. The Project would also provide public and private open space areas totaling 56,881 square feet. The Project would result in up to 1,269,150 square feet of floor area with a maximum floor area ratio (FAR) of up to 13:1. (collectively, the "Project").

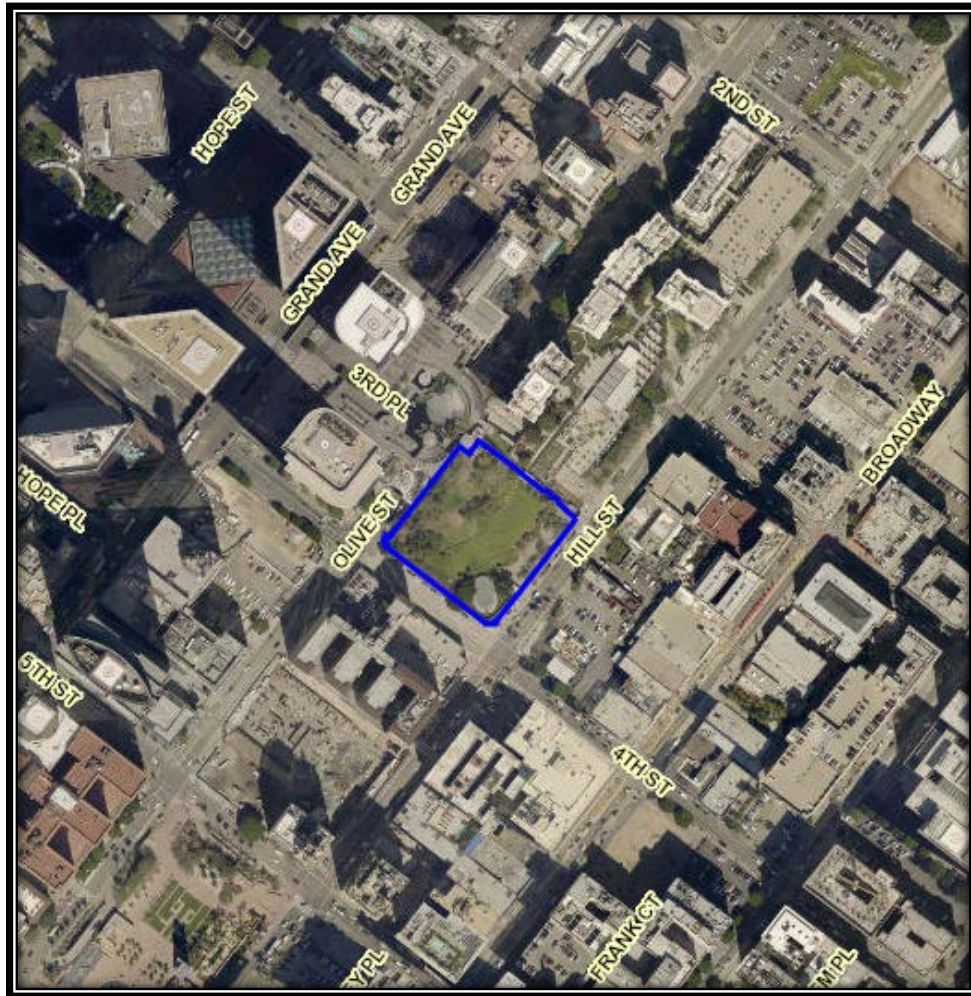
Tower A would include 63 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. Tower A and Tower B would be built on a podium structure over a three-level subterranean parking garage to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent the Project Site. The existing Los Angeles County Metropolitan Transportation Authority (Metro) Red/Purple Lines Pershing Square Station portal would be retained on-site. The Project would require the removal of existing landscaping and the excavation and export of approximately 334,000 cubic yards of soil.

B. Project Location

The Site is located at 332, 350, and 358 South Olive Street; 351 and 361 South Hill Street; and 417 and 425 West 4th Street in downtown Los Angeles. The Site is located within the Central City Community Plan and the Bunker Hill Specific plan area. The City's Historic Core neighborhood is located directly east and the City's Civic Center and Grand Park are located nearby to the north and west. The Jewelry District, Pershing Square, and Restaurant Row on 7th Street and South Park are located nearby to the south. The Site is generally bounded by South Olive Street and California Plaza to the west, the historic Angels Flight funicular⁵ to the north, South Hill Street to the east; and West 4th Street to the south. The Project serves as a key linkage between Bunker Hill directly to the west and the City's Historic Core, directly to the east. Figure 1, below, shows the Site's location in downtown Los Angeles.

⁵ Angels Flight is an historic funicular railway originally constructed in 1901 with tracks connecting Hill Street and Olive Street. Operations ceased in 1969, yet after being stored for 27 years, the funicular was rebuilt and reopened in 1996, half a block south of the original site. The tracks are along the northern edge of the Project Site and connect Hill Street and California Plaza. Angels Flight is 298 feet long on an approximately 33 percent grade.

Figure 1 – Vicinity Map



C. Project Site Background and Existing Conditions

The Site is mostly landscaped and vacant, except for the Los Angeles County Metropolitan Transit Authority ("Metro") Pershing Square Station portal located at the southeast corner of the Site. The Site is located in a hillside area and is characterized by a steep terrain. The drastic grade change from South Hill Street to California Plaza creates an opportunity to design the Project into the topography of the Site and create new pedestrian and accessible passageways from the City's Historic Core to Bunker Hill. The Site served as accessible public open space for several years. It provided seating areas atop a grassy knoll with views of the City's Historic Core. However, the Site was closed to public access several years ago and remains closed to date. The Project will reintroduce open space accessible to the public.

The Site was originally purchased by the City's former Community Redevelopment Agency (the "CRA") as part of the CRA's Bunker Hill Urban Renewal Project (also known as the Bunker Hill

Redevelopment Project).⁶ "Bunker Hill" was defined by the CRA as being generally bounded by the Harbor Freeway (Interstate 110) on the west, 1st Street on the north, 5th Street on the south, and Hill Street on the east. Sitting above Metro's Pershing Square Station, the Site, identified by the CRA as a portion of the "Y-1 Parcel," was originally slated as the third phase of the California Plaza Project; however, the Site was never developed.

Ownership of the Site is vested in the CRA/LA, a Designated Local Authority and successor agency to the CRA (the "CRA/LA"). As part of the CRA dissolution process, the Site was categorized in the Long Range Property Management Plan as a property to be retained for future development. The CRA/LA and the City are parties to an option agreement dated January 8, 2015 (the "Option Agreement"). Under the Option Agreement, the City has an option to purchase the Site for the purpose of selling the Site to a third party that will redevelop the Site in a manner consistent with the Redevelopment Plan, Five-Year Implementation Plan and Community Plan. The Applicant and the City have entered into an Exclusive Negotiating Agreement (the "ENA") with respect to the sale and redevelopment of the Site. Pursuant to the ENA, the Applicant is required to obtain all necessary entitlements to redevelop the Site with the Project. Additionally, during the ENA term, the Applicant and the City will negotiate the necessary disposition agreements for the transfer of the Site from the City to the Applicant.

D. Surrounding Land Uses

The Site is centrally located in Downtown Los Angeles' urban core and is surrounded by a mix of commercial, residential and cultural uses. The properties immediately north of the Site, on the other side of Angels Flight, are zoned R5-4D and are improved with high-density residential uses. The properties immediately east of the Site are zoned C2-4D and are improved with limited commercial uses and surface parking lots. The properties immediately south of the Site are zoned C2-4D and are improved with high density residential uses. And the properties immediately west of the Site are zoned C2-4D and R5-4D and are improved with the California Plaza mixed-use office and retail complex and the Omni Hotel.

The Site's central location makes it a short walk from some of the City's key cultural attractions. The Museum of Contemporary Art, the Broad Museum, the Walt Disney Concert Hall and the Dorothy Chandler Pavilion and the Music Center are all located within a half mile to the northwest of the Site. Grand Park and the City's Civic Center are also a close walk from the Site to the north. Across Hill Street is Grand Central Market and Pershing Square is one block south on Hill Street. Three blocks to the south is 7th Street, which is known as "Restaurant Row". Further south approximately 1.5 miles is the South Park neighborhood and the Staples Center. Figure 2, below, shows the Site's location in relation to the surrounding neighborhood.

⁶ The Bunker Hill Redevelopment Plan expired on January 1, 2013.

E. Land Use and Zoning

1. Existing Zoning and General Plan Land Use Designations

The Site is zoned C2-4D and has a Regional Center Commercial General Plan land use designation. The Site is located within the Bunker Hill Specific Plan area and the Central City Community Plan Area. The Site is also located within (i) the Greater Downtown Housing Incentive Area, (ii) a Transit Priority Area, and (iii) a Los Angeles State Enterprise Zone.

2. Zoning Requirements

a. Permitted Uses

The uses permitted at the Site are governed by the underlying zoning designation and the Specific Plan. The Site's C2 zoning permits a wide range of commercial and residential uses. And the Specific Plan specifically authorizes hotels, entertainment and commercial uses, health clubs and outdoor eating areas.

The Project will include a mix of uses, including, for-sale condominiums, apartments, two hotels, restaurants, bars, and retail establishments. The proposed uses are permitted on the Site pursuant to the existing zoning, the Specific Plan or other applicable regulatory documents. A MCUP will also be required to permit the sale and dispensing of a full line of alcoholic beverages at several locations within the Project, including without limitation, at the hotel bars and pool decks, within hotel mini-bars, at restaurants and bars, retail sales and for special events.

Additionally, the Applicant is requesting a CUP to permit live music and dancing within the Project's hotels, restaurants and bars. SBE Group has proposed two hotels within the Project, including a 255-room Mondrian Hotel in Tower B (defined below) and a 260-room SLS hotel in Tower A (defined below). SBE is a Los Angeles based lifestyle hospitality and entertainment company with hotels in major cities across the globe. SBE hotels often include popular venues for entertainment, dancing and fine dining. The requested CUP will permit SBE to operate the proposed hotels in a manner consistent with its other hotel operations in Los Angeles.

b. Density and Floor Area Ratio

As described below, the applicable floor area ratio ("FAR") for the Site is approximately 13:1. With a total Site area of 97,631 square feet, the maximum allowable floor area would be 1,269,150 square feet. Further, residential density is not restricted by lot area pursuant to Specific Plan Section 7.G.

Ordinarily, the maximum residential density and floor area is governed by a property's zoning designation and height district. The Site is within height district 4, which permits a maximum FAR of approximately 13:1. The Site's maximum allowable floor area is governed by the Specific Plan. Section 12 of the Specific Plan includes a grandfathering clause that specifies the maximum permitted floor area for the Site.

Residential density is typically governed by a site's zoning designation. For properties zoned C2 with a Regional Commercial General Plan land use designation, residential density is subject to R5 zoning restrictions, which limits residential density to one dwelling unit per 200 square feet of lot area. However, the Specific Plan Section 7.G provides that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC.

c. Yards and Setbacks

Specific Plan Section 7.E states that "no yard requirements shall apply except as required by the applicable urban design standards." As such, the provisions of the 2017 Downtown Design Guide: Urban Design Standards and Guidelines (the "Design Guidelines") apply to all projects in the Bunker Hill area, including the Site. The Project's consistency with the Design Guidelines is further described in Section III.E.4, below.

d. Building Heights

The Site is within Height District No. 4, which does not impose a building height limit on the Site. Therefore, the proposed 854-foot Tower A, 494-foot Tower B, and the proposed terraces below comply with the building height requirements for Height District No. 4.

e. Vehicle Parking

The Specific Plan's parking standards supersede LAMC Section 12.21 requirements for parking. As such, for projects within 1,500 feet of a fixed rail transit station, the Specific Plan requires a minimum of 0.25 spaces per unit for residential units with less than two habitable rooms, and 0.5 spaces per unit for all other units.⁷ The Specific Plan has no minimum parking requirement for hotel and non-residential uses for projects within 1,500 feet of a fixed rail transit station.

The Project is within 1,500 feet of the Metro Pershing Square Station portal, which is located on the southeastern corner of the Site. Therefore, the Specific Plan's residential parking requirement equates to 0.5 spaces per unit for the 432 proposed residential units in the Project. The Project would be required to provide a total of 216 spaces for its residential units. No additional parking is required for the Project's other uses. The proposed parking for the Project is approximately 750 parking spaces total.

The number of proposed parking spaces, at this time, is based on a parking demand analysis and input from the hotel operator and other demand considerations for a project of this scale. The Project's adjacency to the Pershing Square Metro station and other design features promotes alternative modes of transportation. Parking demand also balances the needs of condominium owners and residents.

⁷ Specific Plan Section 10(A)(3)(b)

f. Bicycle Parking

For residential uses, the LAMC requires short-term and long-term bicycle parking be provided at the following rates:

Dwelling Units	Short-term Spaces	Long-term Spaces
1-25	1 space per 10 units	1 space per unit
26-100	1 space per 15 units	1 space per 1.5 units
101-200	1 space per 20 units	1 space per 2 units
201+	1 space per 40 units	1 space per 4 units

For the Project's proposed 432 residential units, this results in 18 required short-term bicycle parking spaces and 183 required long-term bicycle parking spaces.

For hotel uses, short- and long-term bicycle parking spaces shall be provided at a rate of one per 10 guest rooms. For the Project's proposed 515 hotel guest rooms, the Project would be required to provide 51 short- and 51 long-term bicycle parking spaces.

For the restaurant/bar and retail uses on the Site, the LAMC requires 1 short-term parking space per 2,000 sq. ft. and 1 long-term parking space per 2,000 sq. ft. The Project includes approximately 72,091 square feet of retail and restaurant space, which would require 36 short-term and 36 long-term bicycle parking spaces.

Overall, the Project is required to provide a 105 short-term bicycle parking spaces and 270 long-term bicycle parking spaces, and the Project will include 105 short-term bicycle parking spaces and 270 long-term bicycle parking spaces. Therefore, the project complies with the City bicycle parking requirements.

3. Project Consistency with the General Plan, Community Plan and Specific Plan

a. General Plan Consistency

The General Plan Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. Framework Element strategies build upon the historic physical form and character of Los Angeles in a manner that enhances, rather than degrades, the City's and region's environmental resources and quality of life for residents. The Framework Element's strategies are based on the principles of economic opportunity, equity, environmental quality, strategic investment, clear and consistent rules and effective implementation.

i. Land Use Element

The Site has a Regional Center Commercial General Plan land use designation. Pursuant to the General Plan, Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity. Regional Centers are characterized as providing a diversity of uses. The General Plan encourages mixed-use developments in Regional Centers integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces and amenities. Regional Centers typically provide a significant number of jobs and

should function as a hub for regional bus and rail transit. Corresponding zoning designations that are consistent with the Regional Center Commercial land use designation include CR, C1.5, C4 and C2 zones.

The Project is consistent with the intent described in the General Plan for properties with a Regional Center Commercial Land Use designation. The Site's C2 zoning designation is consistent with the Site's Regional Center Commercial General Plan land use designation. As envisioned by the General Plan, the Project will result in the redevelopment of a vacant site with a mixed-use development integrating housing and commercial uses. The Project will be a focal point of Downtown Los Angeles, and its central location and adjacency to mass public transit, including the Metro Red and Purple line via the Pershing Square Metro Station, make the Project a transit hub. Specifically, the Project is consistent with and advances the following goals, objectives and policies of the General Plan Land Use Element.

- **GOAL 3A – A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.**
- **Objective 3.1 – Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.**
- **Objective 3.2 – Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.**
 - Policy 3.2.3 – Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
 - Policy 3.2.4 – Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.
- **Objective 3.4 – Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.**

- **GOAL 3F – Mixed-use centers that provide jobs, entertainment, culture, and serve the region.**
- **Objective 3.10** – *Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.*
 - Policy 3.10.3 – Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies, and provide adequate transitions with adjacent residential uses at the edges of the centers.
 - Policy 3.10.4 – Provide for the development of public streetscape improvements, where appropriate
- **Objective 3.11** – *Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.*
- **Objective 3.15** – *Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.*
 - Policy 3.15.3 – Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy
 - Policy 3.15.4 – Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.
 - Policy 3.15.5 – Provide for the development of public streetscape improvements, where appropriate.
- **GOAL 3L – Districts that promote pedestrian activity and provide a quality experience for the City's residents.**
- **Objective 3.16** – *Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.*

- Policy 3.16.3 – Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.

The Project encapsulates the abovementioned goals, objectives and policies. The Project's location adjacent to the Pershing Square Metro station and regional bus lines makes the Project the ideal place for a mixed-use development. Hotel guests and residents will have various public transit options right at the Project's doorstep. As a result, the Project promotes an improved quality of life by facilitating a reduction of vehicular trips and vehicle miles traveled. Additionally, the Project's pedestrian oriented design with wide sidewalks and pedestrian linkages between Hill Street and California Plaza promotes an active streetscape where the pedestrian takes priority over the car. The primary entrances for hotel guests, visitors and residents will be via Olive Street and 4th Street in order to minimize curb cuts along Hill Street.

The Project will also be consistent with surrounding uses and create a seamless transition between Bunker Hill to the west and the City's Historic Core to the east. Currently, the Site is not advancing the goals for the General Plan. It is a vacant and fenced off area. The development of the Project will convert this vacant parcel into a global destination. The addition of 515 hotel rooms will serve tourists visiting nearby cultural attractions like the Walt Disney Concert Hall and Broad Museum, as well as business travelers and convention goers. The proposed housing will increase the supply of for-sale and for-rent housing and will provide affordable units.

ii. Housing

The Housing Element of the General Plan Framework provides goals and policies to guide future residential development and addresses issues relating to housing. The Housing Element states that the City must strive to meet the housing needs of the population in a manner that contributes to a stable, safe, and livable neighborhoods, and improves access to jobs and neighborhood services, particularly by encouraging future housing develop near transit corridors and stations. The Project is consistent with and advances the following goals, objectives and policies of the Housing Element.

- ***GOAL 4A – An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.***
- ***Objective 4.2 – Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.***

The Project includes 252 residential apartments (consisting of studio, one-, two- and three-bedroom units), 180 condominium units (consisting of one-, two- and three-bedroom units as well as penthouses), and associated residential amenities. The proposed unit mix advances the General Plan goal to provide a range of housing opportunities accessible to all residents. The Project's adjacency to the Pershing Square Metro station advances Objective 4.2, and the Project's design creates a seamless transition to higher density developments on Bunker Hill and lower density development to the west in the City's Historic Core.

iii. Urban Form and Neighborhood Design

The Urban Form and Neighborhood Design element of the General Plan Framework focuses on neighborhood identity and livability, and sets out goals and policies for accommodated future growth while preserving the character of existing neighborhoods. The Project is consistent with and advances the following goals, objectives and policies of the Urban Form and neighborhood Design element.

- **GOAL 5A – A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.**
- **Objective 5.2 – Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.**
 - Policy 5.2.2 – Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. Additionally, develop these areas so that they are compatible with surrounding neighborhoods.
- **Objective 5.5 – Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.**
- **Objective 5.8 – Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.**
- **Objective 5.9 – Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.**
 - Policy 5.9.1 – Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.
 - Policy 5.9.2 – Encourage mixed-use development which provides for activity and natural surveillance after commercial business hours through the development of ground floor retail uses and sidewalk cafes.

As described herein, the Project is a mixed-use development that will include hospitality, residential, restaurant and retail uses. The Project's proximity to the fixed rail and bus transit promote the General Plan objective to situate new development near transit corridors to promote the use of public transportation. The active mixed uses on the ground floor and surrounding the public plazas will enhance security in the area by putting eyes on the street and creating a walkable environment. The Project's proposed pedestrian linkages and paseos will create a key connection between Bunker Hill and Hill Street. These improvements will also improve livability in the area and benefit the residents in the Project and in the community by improving the walkability and safety of the neighborhood. Further, the contemporary design of the Project builds on the strengths of the existing neighborhood and is consistent with proposed development in the area.

iv. Open Space and Conservation

The Open Space and Conservation Element of the General Plan Framework addresses the outdoor recreational needs of the City's residents. The Project is consistent with and advances the following goals, objectives and policies of the General Plan with respect to Open Space and Conservation.

- **Objective 6.4** – *Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.*
 - Policy 6.4.3 – Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.
 - Policy 6.4.8 – Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.
 - Policy 6.4.11 – Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.

The Project will include approximately 56,881 square feet of open space. Angels Plaza will be the focal point of the Project's open space and will provide a 16,847 square-foot public plaza with landscaped areas, seating areas and a water feature. The Project will also include a 17,368 square-foot public plaza at Hill Street. Other publicly accessible open space includes a

new decorative staircase connecting Hill Street to Olive street, an extension of California Plaza, rooftop terraces totaling 17,398 square feet.

v. Economic Development

The City's fundamental economic development goals are to provide the physical locations and competitive financial environment necessary to attract various types of economic development to Los Angeles, and to encourage the geographic distribution of job growth in a manner supportive of the City's overall planning objectives. The Project is consistent with and advances the following goals, objectives and policies set forth in the General Plan relating to Economic Development.

- **GOAL 7A – A vibrant economically revitalized City.**
- **Objective 7.2** – *Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.*
 - Policy 7.2.2 – Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.
 - Policy 7.2.3 – Encourage new commercial development in proximity to rail and bus transit corridors and stations.
- **GOAL 7G – A range of Housing options in the City.**
- **Objective 7.9** – *Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.*
 - Policy 7.9.2 – Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.

The Project will have a positive impact on economic development by creating hundreds of temporary and permanent jobs. The Project will also generate significant revenues for the City in the form of sales taxes from the commercial uses and transient occupancy taxes from the hotel uses. Consistent with Goal 7G and Objective 7.9, the Project will provide a range of housing types located adjacent to mass transit and near community services.

vi. Transportation

The City of Los Angeles is recognized worldwide for the high level of mobility of its people. This level of mobility has been made possible by intense investment in the transportation system over the past half century. Investments in the highway and freeway system, the transit system, Los Angeles International Airport, the Port of Los Angeles, and the railroad system have contributed, not only to growth in individual mobility, but also to economic growth that has made Los Angeles one of the great economic centers of the world. Los Angeles has truly become a major center for national and international trade and tourism, and an important hub for international air travel.

The Project is consistent with and advances the goals of the City's Transportation Element. The Transportation Element recognizes the importance of maximizing the efficiency of existing and proposed infrastructure through advanced transportation technology, reducing vehicle trips and miles traveled and by encouraging new development near transit centers. The Project exemplifies the type of project envisioned by the Transportation Element. The Pershing Square Metro Station is an integrated component of the Project. Additionally, the Project is located less than a mile away from the 7th Street Metro station, which provides regional connections to the Metro's Red, Purple, Blue and Exposition lines. Further, over ten regional and local bus lines serve the Project offering connections throughout Los Angeles County. Lastly, the Project is located walking distance to several local attractions, further encouraging the use of alternative modes of transportation and reducing congestion on the City's roadway network.

b. Community Plan Consistency

The City has adopted 35 community plans, which collectively, comprise the General Plan Land Use Element. The Site is located within the Central City Community Plan. More specifically, the Site is located in the Bunker Hill District, one out of nine distinct land use districts in the Community Plan area. The Community Plan is the official guide to future development within the Community Plan area. As described in more detail below, the Project is consistent with and advances the goals, objectives, policies and programs set forth in the Community Plan.

i. Land Use Policies and Programs

The Project is consistent with and advances the following land use goals, objectives and policies.

- **Objective 1-3** – *To foster development which can accommodate a full range of incomes.*
 - Policy 1-3.1 – Encourage a cluster of neighborhood design comprised of housing and services.
- **Objective 2-1** – *To improve Central City's competitiveness as a location for offices, business, retail, an industry.*
 - Policy 2-1.2 – To maintain a safe, clean, attractive and lively environment.
- **Objective 2-3** – *To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows and tourism.*

- **Objective 2-4** – *To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.*
 - Policy 2-4.1 – Promote night life activity by encouraging restaurants, pubs, night clubs, small theatres, and other specialty uses to reinforce existing pockets of activity.
- **Objective 4-1** – *To encourage the expansion and additions of open spaces as opportunities arise.*
- **Objective 4-4** – *To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.*
 - Policy 4-4.1 – Improve Downtown's pedestrian environment in recognition of its important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers and visitors.

The Project will replace a vacant and underutilized site with over one million square feet of new commercial and residential uses. The dwelling unit types and price points of the Project's residential component, including affordable housing comprising five percent of the total for-rent units, provides housing options for a range of income levels. The mixed-use nature of the Project creates a neighborhood cluster where hotel guests and residents have nearby access to community services. Further the inclusion of an SLS Hotel and Mondrian Hotel brands will make the Project a global destination and advance the Community Plan's objective to create a 24-hour environment. In furtherance of Objective 4-4 and Policy 4-4.1, the Project's approximately 56,881 square feet of open space and landscaped pedestrian paseos will significantly increase the pedestrian environment.

ii. Transportation and Circulation

The Project is consistent with and advances the following transportation and circulation goals, objectives and policies.

- **Objective 11-3** – *To provide an internal circulation system with a focus of connecting specific pairs of activity centers to a system that provides greater geographic coverage of Downtown, thus giving Downtown travelers more choices and more flexibility.*
- **Objective 11-6** – *To accommodate pedestrian open space and usage in Central City.*

The Project will create a key pedestrian linkage connecting California Plaza and Bunker Hill to Hill Street and the City's Historic Core through a series of pedestrian paseos, staircases, escalators and elevators. Beyond these critical local connections, the adjacent Pershing Square Metro station and a series of local and regional bus lines provide the downtown traveler with easy access to other areas of Downtown and the greater Los Angeles area.

c. Specific Plan Consistency

As mentioned above, the Project is subject to the Bunker Hill Specific Plan. The Specific Plan is intended to implement the Community Plan. Section 2 of the Specific Plan describes the purposes of the Specific Plan, which include:

- Create a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment;
- Reinforce and enhance the district's identity as the cultural center of the region;
- Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region;
- Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces;
- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use;
- Create a transit-friendly environment by requiring conformance to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses; and
- Support the improvement of the business environment by providing an attractive public realm.

The Project advances the purposes of the Specific Plan by redeveloping a vacant site with a 24-hour mixed-use development that provides a range of housing opportunities, two hotels, and 72,091 square feet of retail and restaurant uses. The Project will also result in the creation of hundreds of temporary and permanent jobs, and will create a new source of revenue for the City through retail sales taxes and hotel transient occupancy taxes. Additionally, the Project's approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core advance the Specific Plan's purpose to create a linked network of open spaces and pathways.

i. Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations applicable to developments within the Specific Plan. Section 7 includes regulations relating to density, permitted uses, setbacks, lot area and open space.

As described above, the maximum FAR for the Site is approximately 13:1, which authorizes up to 1,269,150 square feet of new floor area. The Project would include up to 1,269,150 square feet of new floor area, which complies with the Specific Plan requirements. With respect to maximum residential density, Section 7.G of the Specific Plan states that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC. Therefore, the Project's residential and hotel component comply with the density requirements in the Specific Plan.

The Specific Plan authorizes those uses permitted by the Site's underlying zoning designation (i.e., C2) as well as those uses specifically authorized by the Specific Plan, including, health clubs, outdoor eating areas, hotels, and entertainment and commercial recreation uses. The Project will include a diverse mix of residential, hospitality, restaurant and retail uses. These uses are either permitted under the Specific Plan, or permitted by the Site's underlying zoning. The sale of alcoholic beverages and live entertainment are permitted with a CUP.

The Project will develop a portion of the Y-1 Subarea of the Specific Plan.⁸ The other portion of the Y-1 Subarea comprises Angels Flight funicular. Per the Specific Plan, the Project shall incorporate useable open space that is visible and accessible from the sidewalk and that includes pedestrian amenities such as focal points, gathering places, and landscaped areas, for the purpose of enhancing the quality of life for residents, businesses, and visitors. The Project shall provide such open space at a rate of 1 square foot per 100 square feet of nonresidential floor area. The nonresidential open space requirements need not exceed 5,000 square feet of open space. The requirements of LAMC Section 12.21.G shall also apply, except that they may be reduced 50 percent if the Project provides a pedestrian plaza that is (a) a minimum of 5,000 square feet, (b) located on the ground level with direct pedestrian connection to the adjacent street, (c) unenclosed by any wall, fence gate, or other obstruction, (d) lined with ground floor spaces design for retail, especially restaurants that include outdoor dining, and/or cultural uses, along at least 20 percent of its building frontage, (e) at least 40 percent landscaped, including usable lawn or lawn alternatives part of the landscaping treatment, and (f) includes at least one gathering place with a fountain or other focal element.

LAMC Section 12.21.G requires 51,625 square feet of open space for the residential uses and the Specific Plan requires 5,000 square feet for the nonresidential uses, for a total of 56,625 square feet. The Project includes approximately 56,881 square feet of open space, including two spacious public plazas. The Hill Street Plaza is a 17,368 square-foot public plaza at street level on Hill Street. Passengers exiting the Pershing Square Metro Station will arrive at the Hill Street Plaza, which will provide seating areas, landscaped areas and direct access to ground floor amenities. Angels Plaza will be the Project's focal point. Angels Plaza consists of a 16,847 square-foot public plaza with a water feature, landscaped areas, pedestrian paseos and seating areas. Angels Plaza will be surrounded by active retail and restaurant uses. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B.

As described above, the Project substantially complies with the land use regulations set forth in the Specific Plan.

⁸ Appendix A to the Bunker Hill Specific Plan.

ii. Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations applicable to developments within the Specific Plan. Section 8 includes regulations relating to setbacks, ground floor treatment and massing.

Section 8.A of the Specific Plan requires compliance with the Design Guidelines. The Project's consistency with the Design Guidelines is described in Section III.E.4, below.

Section 8.B.1 of the Specific Plan regulates setbacks within the Specific Plan area. No setbacks are required on retail streets where the ground floor contains retail uses. Olive Street, 4th Street and Hill Street are all designated as Retail Streets per Table 2 in the Specific Plan. Because the Project will include active retail uses on the ground floor, no setbacks are required. As shown on the site plan, the Project buildings will be built to the property line and no setback will be provided in accordance with the Specific Plan.

Section 8.B.2 of the Specific Plan regulates ground floor treatment on Retail Streets. On Olive Street, the Specific Plan requires that 50% of the street frontage be designed to accommodate retail, professional office or live-work uses. On Hill Street and 4th Street, the Specific Plan requires that 75% of the street frontage be designed to accommodate retail, professional office or live-work uses. For the purposes of complying with the Specific Plan and the Design Guidelines, the street frontage shall be calculated excluding any frontage utilized for permitted vehicular access driveways or for access to fixed rail transit stations. Further, the required ground floor space may be located along a courtyard, plaza, or other open space that is visible and accessible from the sidewalk, provided that the retail frontage is visible from the sidewalk.

As shown on the Project plans, the Project is designed to accommodate active ground floor retail uses for 92% of the Hill Street frontage, 32% of the 4th Street Frontage and 11% of the Olive Street frontage.

As proposed, the Project will not fully comply with the Specific Plan requirement to provide 75% of street frontage on 4th Street with retail uses and 50% of street frontage on Olive Street. As such, pursuant to Section 6.C of the Specific Plan, the Applicant's entitlement request includes a request for Director's Determination for Alternative Design to provide relief from the strict application of the Specific Plan Requirements. The findings for the requested Director's Determination for Alternative Design are set forth in Section IV.D, below.

In order to define the public realm, Section 8.B.3 of the Specific Plan includes regulations for massing and street walls. For projects located on Retail Streets, 80% of the project frontage must be lined with a building street wall with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open on up to two sides to a street and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall.

As shown on the Project plans, the Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street plaza, such spaces are also counted towards the Project's required street wall. Similarly, the Project plans show Hill Street with a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. Therefore, the Project complies with the Specific Plan's street wall requirements.

iii. Pedestrian Plan

Section 9 of the Specific Plan establishes a plan for an integrated network of pedestrian linkages throughout the Specific Plan area. As shown in Map C, Pedestrian Plan, of the Specific Plan, future pedestrian connections are designated on the Site along Olive Street and diagonally through the Site from the corner of Hill Street and 4th Street up to the Angels Flight station above Olive Street. The Specific Plan requires pedestrian walkways be constructed at or near the approximate locations designated in the Specific Plan. Pedestrian walkways must be constructed of a hard, durable surface, shall be 15 feet wide at a minimum and 20 feet wide on average, and designed to be wholly contiguous and completely accessible to the public upon full implementation of a linkage between two public rights of way.

Pedestrian connectivity is a priority in the Project's design. The Project will provide the pedestrian pathways shown on Map C in the Specific Plan and additional pedestrian paseos. The Project includes the replacement of the existing staircase along Angels Flight connecting pedestrians from Hill Street to Olive Street and California Plaza. The new staircase will be approximately 16 feet wide and will include a viewing platform of Angels Flight approximately halfway up the staircase. Additionally, a landscaped pedestrian paseo at the Angel's Plaza level will provide pedestrian access from the corner of Olive Street and 4th Street to Angel's Plaza and the Angels Flight viewing platform. Lastly, a series of staircases and escalators provide easy pedestrian access from the corner of Hill Street and 4th Street diagonally across the Site connecting each terrace and providing access up the hill to Olive street and California Plaza. Accessible access to all areas of the Project will be provided via a series of elevators and ramps.

Based on the foregoing, the Project complies the Pedestrian Plan as set forth in the Specific Plan.

iv. Transportation and Parking

Section 10 of the Specific Plan contains transportation and parking regulations applicable to projects within the Specific Plan area. The regulations in the Specific Plan supersede the transportation and parking requirements set forth in the LAMC. Because the Site is located within 1,500 feet of a fixed rail transit station, there is no minimum required parking for nonresidential uses. For residential uses, the Specific Plan requires that the Project include 0.25 spaces for each dwelling unit with less than 2 habitable rooms and 0.5 spaces for dwelling

units with 2 or more habitable rooms. The Project includes a total of 432 dwelling units with 2+ habitable rooms. Thus, a total of 216 parking spaces are required.

The Project will include up to 750 parking spaces in a three-level subterranean parking garage. In addition, 30 percent of the provided parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of the provided parking spaces will have electric vehicle (EV) charging stations in accordance with LAMC requirements. The proposed parking garage would extend to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent to the Project Site. The number of proposed parking spaces is based on a parking demand factors.

4. Downtown Design Guidelines

The Project is subject to the Downtown Design Guidelines. Specifically, Section 8.A of the Specific Plan requires compliance with the applicable provisions of the Downtown Design Guidelines. The Project substantially complies with the Design Guidelines. Included with this application is a checklist demonstrating the Project's compliance with the specific requirements set forth in the Design Guidelines. Where a specific regulation is not applicable to the Project, the checklist includes an attachment justifying why such standard or regulation does not apply to the Project. Where the Project does not comply, as currently designed, the Applicant is requesting a Director's Determination for Alternative Design to obtain relief.

The Design Guidelines contain standards and guidelines for sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing and street walls, on-site open space, architectural detail, streetscape improvements and signage. The Project is consistent with the Design Guidelines as described below:

- *Sidewalks and setbacks* – The Specific Plan does not require any setbacks for the Project. As such the proposed buildings will be constructed at the property line. The pedestrian experience is a top priority in the Project's design. The Project includes numerous landscaped pedestrian paseos and will improve the sidewalks along the Project street frontage. The sidewalk dimensions will be designed to comply with the Downtown Street Standards, which require a 15-foot sidewalk on 4th Street, Hill Street and Olive Street.
- *Ground floor treatment* - The Specific Plan sets forth requirements for ground floor treatment. As described above, Hill Street, Olive Street and 4th Streets are designated as Retail Streets in the Specific Plan. As described in Section III.E.3.c.ii, above, the Project does not comply with the Specific Plan requirement that 75% of the ground floor space on 4th Street and 50% of the ground floor space of Olive Street be designed to accommodate retail or professional office uses. As such Applicant is requesting a Director's Determination for Alternative Design pursuant to Section 6.C of the Specific Plan to obtain relief from the strict application of the Specific Plan.

- *Parking and access* - Access to the Project will be provided via 4th Street and Olive Street. The 4th Street entrance provides access to the hotel and residential lobbies, and the Olive Street entrance provides direct access to the three-level subterranean parking garage. Pursuant to the Specific Plan, the Project must provide at least 216 parking spaces. The Project will include up to 750 parking spaces. The number of proposed parking spaces is based on a parking demand study and discussions with the hotel operators.
- *Massing and street wall* – The Specific Plan provides specific regulations with respect to the Project's street wall. As described above, the Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street plaza, such spaces are also counted towards the Project's required street wall under the Specific Plan. On Hill Street, the Project includes a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements.
- *Open Space* – The Specific Plan set forth the minimum requirements for open space. The Project will provide approximately 56,881 square feet of open space, which is more than the minimum amount of open space required. The open space will be provided at on several terraces connection Hill Street to Olive Street. Specifically, the Project includes a 17,368 square foot public plaza at Hill Street and a 16,847 square-foot public plaza known as Angels Plaza. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B.
- *Architectural Detail* – The Project's contemporary architecture complements and enhances the surrounding developments and provides a seamless transition from the high-rise buildings atop Bunker Hill and the mid-rise buildings to the east in the Historic Core. Tower A will be one of the tallest buildings on the west coast and will become a Los Angeles icon.
- *Streetscape improvements* – The Project prioritizes pedestrians and the proposed streetscape improvements are tailored to encourage pedestrian activity. Street frontages will be landscaped and include street furniture. Additionally, a series of pedestrian pathways and landscaped paseos will connect Hill Street to Olive Street and California Plaza consistent with the Specific Plan's Pedestrian Plan.

The foregoing demonstrates that the Project is in substantial compliance with the provisions of the Design Guidelines. As the Project's design evolves, the requests for deviations may change.

F. Open Space and Landscaping

The LAMC requires usable open space at a rate of 100 square feet for each dwelling unit having less than three habitable rooms, 125 square feet for each dwelling unit having three habitable rooms, and 175 square feet for each dwelling unit having more than three habitable rooms.⁹ Further, Section 7(F)2 of the Specific Plan requires projects to provide 1 square foot of open space for each 100 square feet of non-residential floor area, but is not required to exceed 5,000 square feet. Open space shall incorporate usable open space that is visible and accessible from the sidewalk and that includes pedestrian amenities such as focal points, gathering places, and landscaped areas. A 50 percent reduction in the total amount of open space otherwise required by LAMC Section 12.21.G will be granted if a project includes open space that meets the following requirements:¹⁰ (a) a minimum of 5,000 square feet in size; (b) located on the ground level with direct pedestrian connection to adjacent street; (c) unenclosed by any wall, fence, gate, or other obstruction; (d) lined with ground floor spaces designed for retail, especially restaurants that include outdoor dining, and/or cultural uses, along at least 20 percent of its building frontage; (e) at least 40 percent landscaped, including usable lawn or lawn alternative as part of the landscaping treatment; and (f) includes at least one gathering place with fountain or other focal element.

Pursuant to Specific Plan Section 7(F)2, the Project is only required to provide a maximum of 5,000 square feet of open space for the non-residential floor area. Residential floor area is subject to LAMC Section 12.21.G for a required total of 51,625 square feet. Thus, the Project is required to include a total of 56,625 square feet of open space. As shown on the Project plans, the Project will include approximately 56,881 square feet of open space and, thus, complies with the LAMC requirements for open space.

The Project would incorporate numerous common and private open space and recreational amenities. As shown in the landscape and open space plans, the Project would provide common open space that would be generally publicly accessible during daytime hours in the form of plazas (the Hill Street Plaza and Angels Terrace), gardens, courtyards, and landscaped terraces. The common open space proposed to be provided within the Project would include approximately 56,881 square feet of exterior common area and additional interior common area, in accordance with the requirements of the LAMC. Open spaces would be ADA accessible, with clear site lines. Direct connections would be provided throughout the Site to each new open space as well as to the improved and widened Angels Flight stairs via an overlook landing. Additionally, direct connections would be made to California Plaza on the northwest end of the Site in the form of a large, connected, landscaped terrace. Open spaces would include gardens, fixed and moveable seating, canopy trees for shade, and durable paving materials. Plant species utilized in the Project would consist of both native and adapted plants.

G. Project Design

Key elements of the design of the Project include the re-interpretation of the arrival plaza at Metro's Pershing Square Station, enhancing the pedestrian experience of riding the Angels Flight funicular, and creating a more lively pedestrian experience to and from California Plaza and its adjacent office buildings. To this end, the Project's design consists of a series of cantilevered floors and landscaped terraces that gradually transition from the lowest point of the

⁹ LAMC Section 12.21.G. Per LAMC Section 12.03, for the purpose of applying the open space requirement, a kitchen shall not be considered a habitable room.

¹⁰ Specific Plan Section 7(F).

Site at Hill Street and 4th Street up to California Plaza. Along the path of these terraced levels are active uses and amenities with multiple circulation routes. The terraced levels would sit atop a subterranean parking garage.

The proposed uses would be distributed throughout the terraced levels and in two towers ("Tower A" and "Tower B"). Tower A would include 63 floors with an approximate height of 854 feet. Tower B would include 42 floors with an approximate height of 494 feet. The significantly different heights of the towers have been intentionally designed and placed adjacent to each other to create the sense of a "gateway" into the Project and a transition between the high-rise buildings atop Bunker Hill to the west and the City's Historic Core to the east. In particular, the lower tower (Tower B), which is located along 4th Street and set back from the corner of Hill Street, is transitional, designed to be in-between the scale of the lower neighboring building across 4th Street and the taller scale of the planned new development across Hill Street. The taller tower (Tower A) is located on the north side of the Site and is located closer to the street edge.

As illustrated in the Project plans and renderings, the first terraced level includes parking, retail and restaurant uses, and a newly designed Metro Pershing Square Station. These uses would be integrated by the proposed 17,368 square-foot Hill Street Plaza located at the corner of the Site, which would include landscaping and seating areas. From the Pershing Square Station and Hill Street Plaza, there would be steps and terraces up approximately one story to the second terraced level, the porte cochere level, which would provide access to residential and hotel lobbies and include retail uses along 4th Street. From the porte cochere level would be escalators up to the banquet level. This third level would include separate ballrooms for each of the two hotels, a screening room, a banquet lobby, and retail uses along 4th Street. From the banquet level would be escalators and elevators to the Angels Terrace level. Angels Terrace is a proposed 16,847-square-foot flexible open space area intentionally designed and located in the center of the Project, between the two towers, as the primary publicly accessible open space of the Project. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Angels Terrace would also provide access to multiple other uses surrounding the Project, including Angels Flight via a paseo linking the corner of 4th Street and Olive Street with the steps of Angels Flight and escalators and an elevator up to California Plaza. The Angels Terrace level would also include a variety of retail and restaurant spaces surrounding Angels Terrace.

Above the Angels Terrace level would be the Tower A hotel lobby and a restaurant. This level would also include stairs to Angels Flight and to California Plaza. The final terraced level (the roof of the podium) would include a landscaped expansion of Cal Plaza, additional terrace, and new plaza along Olive Street.

Tower A and Tower B would share part of the podium that includes the proposed residential lobby, hotel lobbies, hotel meeting and event spaces, a portion of the commercial space, and service areas. Above the podium and these uses, Tower A would include a 260-room SLS hotel, 60 residential apartments (consisting of studio, one-, two- and three-bedroom units), 180

condominium units (consisting of one-, two- and three-bedroom units as well as penthouses), and hotel and residential amenities. Tower B would include a 255-room Mondrian hotel, 192 residential apartments (consisting of studio, one-, two- and three-bedroom units) and hotel and residential amenities. Each hotel would have its own lobby and restaurant and would share certain amenities such as a pool deck, spa, the proposed meeting and event spaces, and back-of-house and service areas. The apartments would also share amenities and a pool deck with the condominiums. The apartment and condominium uses would each have their own lobby with elevators serving their respective use and the shared amenities and parking.

The architecture of the towers includes a series of exterior wall designs with each wall design correlating to the program of the building's interior. For example, the first wall expression occurs at the base of the two towers where a horizontal balcony feature wraps around the floor plates to create strong shadows along the exterior. The second wall expression is predominantly present in Tower A and consists of a vertical design expression that utilizes floor to ceiling glass and protruding vertical fins that appear to be seen as layered screens in front of a horizontal substructure to expose balconies at the corners of the floor plates. The building materials that are intended for the exterior of the Project would consist of various types of glass panels, metal balustrades and screening elements, and plaster, and at the podium level, additional materials such as stone and terra cotta. The palette and color scheme for the Project consists of light and warm tones.

As noted above, key components to the design of the Project include the integration of the existing Metro Pershing Square Station and the adjacent historic Angels Flight funicular. With regard to Metro's Pershing Square Station, the Project includes a standalone café located next to the Metro Portal.

The Project's design emphasizes a respectful relationship to Angels Flight. Specifically, Tower A is intentionally placed on Hill Street, near the Angels Flight portal, much like the historic buildings that were the funicular's immediate neighbors in the past. Tower A would also be set back approximately 10 feet from the shared property line with Angels Flight to showcase the track. The existing stairs along Angels Flight would be replaced with a new, enhanced and landscaped version of the stair that connects Hill Street to Olive Street and California Plaza, preserving the close-up experience of Angels Flight that exists today. In addition, Tower A would not be full height for the full length of Angels Flight. For the upper portion of the track, Tower A would step down to approximately eight stories. The northwest end of Tower A would be set back approximately 50 feet from California Plaza, providing space and relief for the upper station of Angels Flight, and allowing views for riders at the top toward the Project's open space and the City beyond, and to allow reciprocating views from the Project's open space back to the upper station. Along the track at most floors, Tower A would feature windows facing Angels Flight, as it had earlier in its history. Residential lobbies located one level above Hill Street would provide views directly over the lower portal. Up one level at the hotel banquet floor, would be meeting spaces toward the Hill Street side that would also provide views of Angels Flight. Toward the top, hotel rooms with balconies would face the track, restoring the intimate

personal relationship between building occupants and riders historically had with one another. Located about mid-way up the track, a double height lobby and lounge would have a full height window wall facing Angels Flight. At the street level, the retail storefront would be set back from the Hill Street sidewalk near the lower portal. This would open up views to the portal for those walking along Hill Street and would provide a queuing area at the lower station.

H. Access and Circulation

Primary regional access to the Site is provided by State Route 110 (SR-110) and the Hollywood Freeway (US-101), which are accessible within less than one mile of the Site. Major arterials providing regional access to the Project Site include 4th Street, which converges with 3rd Street, and Hill Street, which converges with Martin Luther King Jr. Boulevard.

Public transit service in the vicinity of the Project Site includes Metro's subway Red Line and numerous local and regional bus lines, which provide connections to other Downtown subway stations. In particular, Metro's Pershing Square Station, which is located on the southeastern corner of the Site, provides connections to Metro's Red Line and Purple Line. There is also a bus stop along Hill Street, across from the Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, and 94 and the Los Angeles Department of Transportation (LADOT)'s Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines 2/302, 4, 10/48, and 794.

Vehicular access to the Project Site would be provided via two access points, including one at Olive Street and another at 4th Street. The Olive Street access would be the primary site access for users of the parking garage and would include a direct ramp down to the parking levels. The 4th Street access would provide access to the porte cochere. In addition to entrances to the hotel lobbies, the porte cochere would provide access to the apartment and condominium lobbies. All parking via the porte cochere would be by valet service. Service deliveries would occur via Olive Street where the loading dock would be located beneath the California Plaza overbuild. Access for trash pickup would be provided via Olive Street.

Pedestrian access would be enhanced along the perimeter and throughout the Project Site and would be provided via new pedestrian walkways from 4th Street, Olive Street, and Hill Street. In addition, landscaped terraces would feature stairs, escalators, and elevators that would connect the levels and surrounding streets. A pedestrian paseo proposed at 4th Street and Olive Street would be a key pedestrian access point to the Project Site. This paseo would extend from the corner of 4th Street and Olive Street to a new staircase next to Angels flight. Overall, pedestrian access to the Project Site would be provided via steps along Angels Flight, connecting Hill Street to Olive Street and California Plaza, pedestrian paseos and the various terraced levels connecting the Project to the surrounding uses and streets.

I. Project Lighting and Signage

The Project lighting would include shielded exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, shielded lighting to accent signage,

architectural features, exterior artwork or murals, and landscaping elements would be incorporated throughout the Project. Architectural lighting and features may also be considered as the design evolves. Exterior lights, including lights on the rooftop of Tower B, would be directed onto the Site and designed to minimize light trespass from the Site.

Characteristic of a Downtown area, the tallest tower, Tower A, would include a rooftop light feature as an architectural element to highlight the Project. New sources of artificial lighting that would be introduced by the Project would also include interior lighting, architectural lights, digital displays and automobile headlights. Project lighting would be designed to comply with applicable LAMC lighting standards or other regulatory standards established by the entitlements for the Project.

Project signage would include a central identification sign and various general informational wayfinding and retail signs typically associated with a mixed-use project similar to the Project. The Project identification sign would be located on Hill Street Plaza and would consist of a building-mounted sign with lettering presenting the Project name and/or address. The Project would also have building/tenant identification signs located on the buildings (either at the top of the tower(s) or mid-building according to hotel branding standards.

Typical of an urban mixed-use center, the Project would include retail signage primarily orienting towards Hill Street and 4th Street. Due to the continuous changing nature of retail, retail signage could change over time. Other vertical building-mounted signage would be located along 4th Street and Olive Street to indicate the main residential guest and commercial parking entrances. Awning signs and projecting signs would be used to identify the residential lobby entrances and retail locations at a pedestrian scale. Wayfinding signs would be located at parking garage entrances, elevator lobbies, and residential corridors.

Project signage may also include electronic message displays, large format static signs, or murals on building walls intended to complement the design of the structures and enliven the pedestrian experience while respecting the urban context and surrounding uses. In general, new signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the proposed uses. Project signage would be illuminated by means of shielded low to medium output external lighting, internal halo lighting, or ambient light.

J. Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to high efficiency plumbing fixtures and weather-

based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design.

K. California Environmental Quality Act ("CEQA")

On March 29, 2019, the City published a Notice of Preparation and Initial Study for the Project. The City will prepare an Environmental Impact Report ("EIR") for the Project and will plan to publish the EIR winter 2020.

IV. ENTITLEMENT FINDINGS

A. Project Permit Compliance Pursuant to LAMC Section 11.5.7.C.

1. That the Project substantially complies with the applicable regulations, findings, standards and provisions of the Specific Plan.

The Project substantially complies with the applicable regulations, findings, standards and provisions of the Specific Plan. However, as further described in Section IV.D, below, the Applicant is requesting a Director's Determination for Alternative Design pursuant to Section 6.C of the Specific Plan to provide relief from some of the design regulations set forth in Section 8 of the Specific Plan. As described below, the Project is consistent with and advances the purposes of the Specific Plan and substantially complies with the development and design regulations set forth therein.

Specific Plan Purpose and Intent

Section 2 of the Specific Plan describes the purposes of the Specific Plan, which include:

- Create a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment;
- Reinforce and enhance the district's identity as the cultural center of the region;
- Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region;
- Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces;
- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use;
- Create a transit-friendly environment by requiring conformance to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses; and
- Support the improvement of the business environment by providing an attractive public realm.

The Project advances the purposes of the Specific Plan by redeveloping a vacant site with a 24-hour mixed-use development that provides a range of housing opportunities, two hotels, and over 72,091 square feet of retail and restaurant uses in two towers. The Project will also result in the creation of hundreds of temporary and permanent jobs, and will create a new source of revenue for the City through retail sales taxes and hotel transient occupancy taxes. Additionally, the Project's approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core advance the Specific Plan's purpose to create a linked network of open spaces and pathways.

Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations applicable to developments within the Specific Plan. Section 7 includes regulations relating to density, permitted uses, setbacks, lot area and open space.

The maximum FAR for the Site is approximately 13:1, which authorizes up to 1,269,359 square feet of new floor area. The Project would include up to 1,269,150 square feet of new floor area, which complies with the Specific Plan requirements. With respect to maximum residential density, Section 7.G of the Specific Plan states that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC. Therefore, the Project's residential and hotel components comply with the density requirements in the Specific Plan.

The Specific Plan authorizes those uses permitted by the Site's underlying zoning designation (*i.e.*, C2) as well as those uses specifically authorized by the Specific Plan, including, health clubs, outdoor eating areas, hotels, and entertainment and commercial recreation uses. The Project will include a diverse mix of residential, hospitality, restaurant and retail uses. These uses are either permitted under the Specific Plan, or permitted by the Site's zoning. The sale of alcoholic beverages are permitted with a CUP.

The Project will develop a portion of Y-1 Subarea of the Specific Plan. LAMC Section 12.21.G requires 51,625 square feet of open space for the residential uses and the Specific Plan requires 5,000 square feet for the nonresidential uses, for a total of 56,625 square feet. The Project includes approximately 56,881 square feet of open space, including two spacious public plazas. The Hill Street Plaza is a 17,368 square-foot public plaza at street level on Hill Street. Passengers exiting the Pershing Square Metro Station will arrive at the Hill Street Plaza, which will provide seating areas, landscaped areas and direct access to ground floor amenities. Angels Plaza will be the Project's focal point. Angel's Plaza consists of a 16,847 square-foot public plaza with a water feature, landscaped areas, pedestrian paseos and seating areas. Angels Plaza will be surrounded by active retail and restaurant uses. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B. The proposed landscape plan is included in this application.

As described above, the Project substantially complies with the land use regulations set forth in the Specific Plan.

Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations applicable to developments within the Specific Plan. Section 8 includes regulations relating to setbacks, ground floor treatment and massing.

Section 8.A of the Specific Plan requires compliance with the Design Guidelines. The Project's consistency with the Design Guidelines is described in Section III.E.4, above.

Section 8.B.1 of the Specific Plan regulates setbacks within the Specific Plan area. No setbacks are required on retail streets where the ground floor contains retail uses. Olive Street, 4th Street and Hill Street are all designated as "Retail Streets" per Table 2 in the Specific Plan. Because the Project will include active retail uses on the ground floor, no setbacks are required. As shown on the site plan, the Project buildings will be built to the property line and no setback will be provided in accordance with the Specific Plan.

Section 8.B.2 of the Specific Plan regulates ground floor treatment on Retail Streets. On Olive Street, the Specific Plan requires that 50% of the street frontage be designed to accommodate retail, professional office or live-work uses. On Hill Street and 4th Street, the Specific Plan requires that 75% of the street frontage be designed to accommodate retail, professional office or live-work uses. For the purposes of complying with the Specific Plan and the Design Guidelines, the street frontage shall be calculated excluding any frontage utilized for permitted vehicular access driveways or for access to fixed rail transit stations. Further, the required ground floor space may be located along a courtyard, plaza, or other open space that is visible and accessible from the sidewalk, provided that the retail frontage is visible from the sidewalk.

As shown on the Project plans, the Project is designed to accommodate active ground floor retail uses for 92% of the Hill Street frontage, 66% of the 4th Street Frontage and 11% of the Olive Street frontage. As proposed, the Project will not fully comply with the Specific Plan requirement to provide 75% of street frontage on 4th Street with retail uses and 50% of street frontage on Olive Street. As such, pursuant to Section 6.C of the Specific Plan, the Applicant's entitlement request includes a request for Director's Determination for Alternative Design to provide relief from the strict application of the Specific Plan Requirements. The findings for the requested Director's Determination for Alternative Design are set forth in Section IV.D, below.

In order to define the public realm, Section 8.B.3 of the Specific Plan includes regulations for massing and street walls. For projects located on Retail Streets, 80% of the project frontage must be lined with a building street wall with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open on up to two sides to a street and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall.

As shown on the Project plans, the Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall. Similarly, the Project plans show Hill Street with a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. Therefore, the Project complies with the Specific Plan's street wall requirements.

Pedestrian Plan

Section 9 of the Specific Plan establishes a plan for an integrated network of pedestrian linkages throughout the Specific Plan area. As shown in Map C of the Specific Plan, future pedestrian connections are designated on the Site along Olive Street and diagonally through the Site from the corner of Hill Street and 4th Street up to the Angels Flight station above Olive Street. The Specific Plan requires pedestrian walkways be constructed at or near the approximate locations designated in the Specific Plan. Pedestrian walkways must be constructed of a hard, durable surface, shall be 15 feet wide at a minimum and 20 feet wide on average, and designed to be wholly contiguous and completely accessible to the public upon full implementation of a linkage between two public rights of way.

Pedestrian connectivity is a priority in the Project's design. The Project will provide the pedestrian pathways shown on Map C in the Specific Plan and additional pedestrian paseos. The Project includes the replacement of the existing staircase along Angels Flight connecting pedestrians from Hill Street to Olive Street and California Plaza. The new staircase will be approximately 16 feet wide and will include a viewing platform of Angels Flight approximately halfway up the staircase. Additionally, a landscaped pedestrian paseo at the Angel's Plaza level will provide pedestrian access from the corner of Olive Street and 4th Street to Angel's Plaza and the Angels Flight viewing platform. Lastly, a series of staircases and escalators provide easy pedestrian access from the corner of Hill Street and 4th Street diagonally across the Site connecting each terrace and providing access up the hill to Olive Street and California Plaza. Accessible access to all areas of the Project will be provided via a series of elevators and ramps.

Based on the foregoing, the Project complies the Pedestrian Plan as set forth in the Specific Plan.

Transportation and Parking

Section 10 of the Specific Plan contains transportation and parking regulations applicable to projects within the Specific Plan area. The regulations in the Specific Plan supersede the transportation and parking requirements set forth in the LAMC. Because the Site is located within 1,500 feet of a fixed rail transit station, there is no minimum required parking for nonresidential uses. For residential uses, the Specific Plan requires that the Project include 0.25 spaces for each dwelling unit with less than 2 habitable rooms and 0.5 spaces for dwelling units with 2 or more habitable rooms. Based on these requirements, a total of 216 parking spaces are required (432 units with 2+ habitable rooms x 0.5 = 216 spaces).

The Project will include, as currently designed, up to 750 parking spaces in a three-level subterranean parking garage. In addition, 30 percent of the provided parking spaces would be capable of supporting future EVSE, and 10 percent of the provided parking spaces will have EV charging stations in accordance with LAMC requirements. The proposed parking garage would extend to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent to the Project Site. The number of proposed parking spaces is based on a parking demand factors.

Based on the foregoing, the Project substantially complies with the applicable regulations, findings, standards and provisions of the Specific Plan.

2. That the Project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible.

On March 29, 2019, the City published a Notice of Preparation and Initial Study for the Project. The City will prepare an Environmental Impact Report ("EIR") for the Project and will plan to publish the EIR winter 2020. The Mitigation Monitoring and Reporting Program will incorporate mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the Project, to the extent physically feasible.

B. Master Conditional Use Permit to Permit the On- and Off-site Sale and Dispensing of Alcoholic Beverages Pursuant to LAMC Section 12.24.W.1.

1. The Project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.

The Project will enhance the built environment in the surrounding neighborhood and will provide a function and service that is essential and beneficial to the community, City and region. The Project will replace a vacant underutilized site in the center of Downtown Los Angeles' urban core with a dense mixed-use project including a diverse mix of hotel, retail and restaurant uses. The Project's hotel component will provide a total of 515 hotel guestrooms within two hotels, which will serve tourists, business travelers and convention goers. The proposed retail/restaurant uses will round off a fully integrated mixed-use, transit oriented development.

The ability to sell and dispense alcoholic beverages from the Project's hotels, restaurants and retail uses provides an amenity to residents, hotel guests and the community. The operator of the hotels, SBE Group, is globally recognized for its lifestyle hotel brand that provide onsite entertainment and fine dining. The Applicant requests a master CUP to authorize the sale and dispensing of a full line of alcoholic beverages within the hotel rooms, banquet facilities and hotel bars and restaurants. The requested master CUP would also permit the sale and dispensing of alcoholic beverages at the Project's restaurants as an added amenity to residents and visitors dining at the Project. The total number of tenant spaces requesting CUBs, size, and license types is identified in the table below:

Tenant Space	Use	Size	Seat Count*	License Type(s)**	On- or Off-Site
1	Café	1,047 SF	47	47	On-site
2	Restaurant/Retail	6,948 SF	309	47/21	On-site/off-site

3	Retail	4,964 SF	n/a	21	Off-site
4	Retail	1,833 SF	n/a	21	Off-site
5	Restaurant/Retail	4,327 SF	194	47/21	On-site/off-site
6	Retail	1,265 SF	n/a	21	Off-site
7	Retail	2,591 SF	n/a	21	Off-site
8	Restaurant/Retail	3,789 SF	168	47/21	On-site/off-site
9	Retail	1,866 SF	n/a	21	Off-site
10	Restaurant/Retail	4,339 SF	193	47/21	On-site/off-site
11	Retail	1,416 SF	n/a	21	Off-site
12	Retail	2,444 SF	n/a	21	Off-site
13	Restaurant/Retail	21,999 SF	566	47/21	On-site/off-site
14	Restaurant/Retail	4,308 SF	115	47/21	On-site/off-site
15	Restaurant/Retail	9,711 SF	259	47/21	On-site/off-site
	Hotel A	230,245 SF		47 and 66	On-site
	Hotel B	239,872 SF		47 and 66	On-site

*Seat count is provided for conceptual purposes only. Final seat count and tenant layout will be determined by the future tenant/operator and provided for City review as part of a future Plan Approval application.

** [ABC License Types](#) include:

Type 47 – On Sale General – Eating Place – (Restaurant) Authorizes the sale of beer, wine and distilled spirits for consumption on the licenses premises. Authorizes the sale of beer and wine for consumption off the licenses premises. Must operate and maintain the licensed premises as a bona fide eating place. Must maintain suitable kitchen facilities, and must make actual and substantial sales of meals for consumption on the premises. Minors are allowed on the premises.

Type 21 – Off-Sale General – (Package Store) Authorizes the sale of beer, wine and distilled spirits for consumption off the premises where sold. Minors are allowed on the premises.

Type 66 – Controlled Access Cabinet Permits – These permits are issued to licensed hotels or motels and allow for the sale of packaged distilled spirits in guestrooms. The distilled spirits sold pursuant to these permits shall be in containers of 50 milliliters or less and must be secured in a locked cabinet.

Downtown Los Angeles is a vibrant and eclectic neighborhood of existing and new retail shops, restaurants, and nightlife destinations. Therefore, a beverage program would not only be consistent with industry standards, but with neighborhood conditions. By providing a modest beverage program for hotel guests and restaurant patrons the Project will help ensure guests do not have to drive off-site.

Based on the foregoing, the Project, including the provision for the sale of alcoholic beverages, will enhance the built environment and provide service that benefits the Project's residents, hotel guests, visitors and the community.

2. The Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety. The Site is centrally located in Downtown Los Angeles' urban core and is surrounded by a mix of commercial, residential and cultural uses. The properties immediately north of the Site, on the other side of Angels Flight, are zoned R5-4D and are improved with residential uses. The properties immediately east of the Site are zoned C2-4D and are improved with limited commercial uses and surface parking lots. The properties immediately south of the Site are zoned C2-4D and are improved with multi-family residential uses. And the properties immediately west of the Site are zoned C2-4D and R5-4D and are improved with the California Plaza mixed-use office complex and the Omni Hotel.

The Site's central location makes it a short walk from some of the City's key cultural attractions. The Museum of Contemporary Art, the Broad Museum, the Walt Disney Concert Hall and the Dorothy Chandler Pavilion and the Music Center are all located within a half mile to the northwest of the Site. Grand Park and the City's Civic Center are also a close walk from the Site to the north. Across Hill Street is Grand Central Market and Pershing Square is one block south on Hill Street. Three blocks to the south is 7th Street, which is known as "Restaurant Row". Further south approximately 1.5 miles is the South Park neighborhood and the Staples Center.

The Project consists of a mixed-use development in two towers above a three-level subterranean garage. Tower A will reach a height of 854 feet and will include 180 residential condominium units, 60 apartments and a 260-room SLS hotel. Tower B will reach a height of 494 feet and will include 192 residential apartment units and a 255-room Mondrian Hotel. Both towers share a podium that is activated by retail/restaurant uses. The Project is located adjacent to California Plaza, which features two large office towers, which range in height from 750 feet and 570 feet. There is a planned condo tower located across from the Site on Hill Street, which is expected to be 405 feet. Other structures in the Bunker Hill neighborhood approximate to the Site include: the Wells Fargo Center on Grand Avenue (including 723 feet and 560 feet towers), The Bank of America Center on Hope Street (735 feet), and the US Bank Tower on 5th Street (1,018 feet). Thus, the building form such as bulk, height, and architecture will be compatible with surrounding properties.

Further, the Towers are staggered in a manner that creates a seamless transition from the high-rise buildings on Bunker Hill to the mid-rise buildings to the east in the Historic Core. Thus, the Project is compatible with the surrounding uses and will not have an adverse impact on any surrounding property.

The Applicant will provide adequate security measures for the Project, including on-site staff and for the hotel and restaurant uses, as well as on-site security. Adequate lighting will be provided throughout the Project to ensure a safe environment throughout evening hours. Restaurant employees will be required to comply with industry and state operational

requirements for service of alcohol. Further, state law regulates the hours in which beverage service may operate, and standard conditions will be imposed on the Applicant by the Los Angeles Police Department, which include restrictions on time of operation, location, and manner of beverage service.

Based on the foregoing, the Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

3. The Project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

As described below, the Project substantially conforms with the purpose, intent and provisions of the General Plan, the Community Plan and the Specific Plan.

General Plan Framework

The General Plan Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. The Framework Element strategies build upon the historic physical form and character of Los Angeles in a manner that enhances, rather than degrades, the City's and region's environmental resources and quality of life for residents. The Framework Element's strategies are based on the principles of economic opportunity, equity, environmental quality, strategic investment, clear and consistent rules and effective implementation.

Land Use Element

The Site has a Regional Center Commercial General Plan land use designation. Pursuant to the General Plan, Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity. Regional Centers are characterized as providing a diversity of uses. The General Plan encourages mixed-use developments in Regional Centers integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces and amenities. Regional Centers typically provide a significant number of jobs and should function as a hub for regional bus and rail transit. Corresponding zoning designations that are consistent with the Regional Center Commercial land use designation include CR, C1.5, C4 and C2 zones.

The Project is consistent with the intent described in the General Plan for properties with a Regional Center Commercial Land Use designation. And the Site's C2 zoning designation is consistent with the Site's Regional Center Commercial General Plan land use designation. As envisioned by the General Plan, the Project will result in the redevelopment of a vacant site with a mixed-use development integrating housing, and commercial uses. The Project will be a focal point of Downtown Los Angeles, and its central location and adjacency to mass public transit, including the Metro Red and Purple line via the Pershing Square Metro Station, make the

Project a transit hub. Specifically, the Project is consistent with and advances the following goals, objectives and policies of the General Plan Land Use Element.

- **GOAL 3A – A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.**
- **Objective 3.1 – Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.**
- **Objective 3.2 – Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.**
 - Policy 3.2.3 – Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
 - Policy 3.2.4 – Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.
- **Objective 3.4 – Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.**
- **GOAL 3F – Mixed-use centers that provide jobs, entertainment, culture, and serve the region.**
- **Objective 3.10 – Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.**
 - Policy 3.10.3 – Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies, and provide adequate transitions with adjacent residential uses at the edges of the centers.

- Policy 3.10.4 – Provide for the development of public streetscape improvements, where appropriate
- **Objective 3.11** – *Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.*
- **Objective 3.15** – *Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.*
 - Policy 3.15.3 – Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy
 - Policy 3.15.4 – Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.
 - Policy 3.15.4 – Provide for the development of public streetscape improvements, where appropriate.
- **GOAL 3L – Districts that promote pedestrian activity and provide a quality experience for the City's residents.**
- **Objective 3.16** – *Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.*
 - Policy 3.16.3 – Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.

The Project encapsulates the abovementioned goals, objectives and policies. The Project's location adjacent to the Pershing Square Metro station and regional bus lines makes the Project the ideal place for a mixed-use development. Hotel guests and residents will have no reason to drive and add to the congestion in Downtown because of the various public transit options right at the Project's doorstep. As a result, the Project promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution. Additionally, the Project's pedestrian oriented design with wide sidewalks and pedestrian linkages between Hill Street and California Plaza promotes an active streetscape where the pedestrian takes priority over the car. The primary entrances for hotel guests, visitors and residents will be via Olive Street and 4th Street in order to minimize curb cuts along Hill Street.

The Project will also be consistent with surrounding uses and create a seamless transition between Bunker Hill to the west and the City's Historic Core to the east. Currently, the Site is not advancing the goals for the General Plan. It is a vacant and fenced off area. The development of the Project will convert this vacant parcel into a global destination. The addition of 515 hotel rooms will serve tourists visiting nearby cultural attractions like the Walt Disney Concert Hall and Broad Museum, as well as business travelers and convention goers. The proposed housing will increase the supply of for-sale and for rent housing and will provide affordable units.

Housing Element

The Housing Element of the General Plan Framework provides goals and policies to guide future residential development and address issues relating to housing. The Housing Element states that the City must strive to meet the housing needs of the population in a manner that contributes to a stable, safe, and livable neighborhoods, and improves access to jobs and neighborhood services, particularly by encouraging future housing development near transit corridors and stations. The Project is consistent with and advances the following goals, objectives and policies of the Housing Element.

- **GOAL 4A – An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.**
- **Objective 4.2 – Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.**

The Project includes 252 residential apartments (consisting of studio, one-, two- and three-bedroom units), 180 condominium units (consisting of one-, two- and three-bedroom units as well as penthouses), and associated residential amenities. The proposed unit mix advances the General Plan goal to provide a range of housing opportunities accessible to all residents. The Project's adjacency to the Pershing Square Metro station advances Objective 4.2, and the Project's design creates a seamless transition to higher density developments on Bunker Hill and lower density development to the west in the City's Historic Core.

Urban Form and Neighborhood Design

The Urban Form and Neighborhood Design element of the General Plan Framework focuses on neighborhood identity and livability, and sets out goals and policies for accommodated future growth while preserving the character of existing neighborhoods. The Project is consistent with and advances the following goals, objectives and policies of the Urban Form and Neighborhood Design element.

- **GOAL 5A – A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.**

- **Objective 5.2** – *Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.*
 - Policy 5.2.2 – Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. Additionally, develop these areas so that they are compatible with surrounding neighborhoods.
- **Objective 5.5** – *Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*
- **Objective 5.8** – *Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.*
- **Objective 5.9** – *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*
 - Policy 5.9.1 – Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.
 - Policy 5.9.2 – Encourage mixed-use development which provides for activity and natural surveillance after commercial business hours through the development of ground floor retail uses and sidewalk cafes.

As described herein, the Project is a mixed-use development that will include hospitality, residential, restaurant and retail uses. The Project's proximity to the fixed rail and bus transit promote the General Plan objective to situate new development near transit corridors to promote the use of public transportation. The active uses on the ground floor and surrounding the public plazas will enhance security in the area by putting eyes on the street and creating a walkable environment. The Project's proposed pedestrian linkages and paseos will create a key connection between Bunker Hill and Hill Street. These improvements will also improve livability in the area and benefit the residents in the Project and in the community by improving the walkability and safety of the neighborhood. Further, the contemporary design of the Project builds on the strengths of the existing neighborhood and is consistent with proposed development in the area.

Open Space and Conservation

The Open Space and Conservation Element of the General Plan Framework addresses the outdoor recreational needs of the City's residents. The Project is consistent with and advances the following goals, objectives and policies of the General Plan with respect to Open Space and Conservation.

- **Objective 6.4** – *Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.*
 - Policy 6.4.3 – Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.
 - Policy 6.4.8 – Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.
 - Policy 6.4.11 – Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.

The Project will include approximately 56,881 square feet of open space. Angels Plaza will be the focal point of the Project's open space and will provide a 16,847 square-foot public plaza with landscaped areas, seating areas and a water feature. The Project will also include a 17,368 square-foot public plaza at Hill Street. Other publicly accessible open space includes a new decorative staircase connecting Hill Street to Olive Street, an extension of California Plaza, rooftop terraces. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B

Economic Development

The City's fundamental economic development goals are to provide the physical locations and competitive financial environment necessary to attract various types of economic development to Los Angeles, and to encourage the geographic distribution of job growth in a manner supportive of the City's overall planning objectives. The Project is consistent with and advances the following goals, objectives and policies set forth in the General Plan relating to Economic Development.

- **GOAL 7A – A vibrant economically revitalized City.**
- **Objective 7.2** – *Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.*
 - Policy 7.2.2 – Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.
 - Policy 7.2.3 – Encourage new commercial development in proximity to rail and bus transit corridors and stations.
- **GOAL 7G – A range of Housing options in the City.**
- **Objective 7.9** – *Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.*
 - Policy 7.9.2 – Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.

The Project will have a direct positive impact on economic development by creating hundreds of temporary and permanent jobs. The Project will also generate significant revenues for the City in the form of sales taxes from the commercial uses and transient occupancy taxes from the hotel uses. Consistent with Goal 7G and Objective 7.9, the Project will provide a range of housing types located adjacent to mass transit and near community services.

Transportation

The City of Los Angeles is recognized worldwide for the high level of mobility of its people. This level of mobility has been made possible by intense investment in the transportation system over the past half century. Investments in the highway and freeway system, the transit system, Los Angeles International Airport, the Port of Los Angeles, and the railroad system have contributed, not only to growth in individual mobility, but also to economic growth that has made Los Angeles one of the great economic centers of the world. Los Angeles has truly become a major center for national and international trade and tourism, and an important hub for international air travel.

The Project is consistent with and advances the goals of the City's Transportation Element. The Transportation Element recognizes the importance of maximizing the efficiency of existing and proposed infrastructure through advanced transportation technology, reducing vehicle trips and

miles traveled and by encouraging new development near transit centers. The Project exemplifies the type of project envisioned by the Transportation Element. The Pershing Square Metro Station is an integrated component of the Project. Additionally, the Project is located less than a mile away from the 7th Street Metro station, which provides regional connections to the Metro's Red, Purple, Blue and Exposition lines. Further, over ten regional and local bus lines serve the Project offering connections throughout Los Angeles County. Lastly, the Project is located walking distance to several local attractions, further encouraging the use of alternative modes of transportation and reducing congestion on the City's roadway network.

Community Plan

The City has adopted 35 community plans, which collectively, comprise the General Plan Land Use Element. The Site is located within the Central City Community Plan. More specifically, the Site is located in the Bunker Hill District, one out of nine distinct land use districts in the Community Plan area. The Community Plan is the official guide to future development within the Community Plan area. As described in more detail below, the Project is consistent with and advances the goals, objectives, policies and programs set forth in the Community Plan.

Land Use Policies and Programs

The Project is consistent with and advances the following land use goals, objectives and policies.

- ***Objective 1-3 – To foster development which can accommodate a full range of incomes.***
 - Policy 1-3.1 – Encourage a cluster of neighborhood design comprised of housing and services.
- ***Objective 2-1 – To improve Central City's competitiveness as a location for offices, business, retail, an industry.***
 - Policy 2-1.2 – To maintain a safe, clean, attractive and lively environment.
- ***Objective 2-3 – To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows and tourism.***
- ***Objective 2-4 – To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.***
 - Policy 2-4.1 – Promote night life activity by encouraging restaurants, pubs, night clubs, small theatres, and other specialty uses to reinforce existing pockets of activity.
- ***Objective 4-1 – To encourage the expansion and additions of open spaces as opportunities arise.***
- ***Objective 4-4 – To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.***

- Policy 4-4.1 – Improve Downtown's pedestrian environment in recognition of its important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers and visitors.

The Project will replace a vacant and underutilized site with over one million square feet of new commercial and residential uses. The dwelling unit types and price points of the Project's residential component, including affordable housing comprising five percent of the total for-rent units, provides housing options for a range of income levels. The mixed-use nature of the Project creates a neighborhood cluster where hotel guests and residents have nearby access to community services. Further the inclusion of an SLS Hotel and Mondrian Hotel will make the Project a global destination and advance the Community Plan's objective to create a 24-hour environment. In furtherance of Objective 4-4 and Policy 4-4.1, the Project's approximately 56,881 square feet of open space and landscaped pedestrian paseos will significantly increase the pedestrian environment.

Transportation and Circulation

The Project is consistent with and advances the following transportation and circulation goals, objectives and policies.

- **Objective 11-3** – *To provide an internal circulation system with a focus of connecting specific pairs of activity centers to a system that provides greater geographic coverage of Downtown, thus giving Downtown travelers more choices and more flexibility.*
- **Objective 11-6** – *To accommodate pedestrian open space and usage in Central City.*

The Project will create a key pedestrian linkage connecting California Plaza and Bunker Hill to Hill Street and the City's Historic Core through a series of pedestrian paseos, staircases, escalators and elevators. Beyond these critical local connections, the adjacent Pershing Square Metro station and a series of local and regional bus lines provide the downtown traveler with easy access to other areas of Downtown and the greater Los Angeles area.

Specific Plan

As described below, the Project is consistent with and advances the purposes of the Specific Plan and substantially complies with the development and design regulations set forth therein.

Specific Plan Purpose and Intent

Section 2 of the Specific Plan describes the purposes of the Specific Plan, which include:

- Create a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment;
- Reinforce and enhance the district's identity as the cultural center of the region;
- Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region;

- Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces;
- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use;
- Create a transit-friendly environment by requiring conformance to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses; and
- Support the improvement of the business environment by providing an attractive public realm.

The Project advances the purposes of the Specific Plan by redeveloping a vacant site with a 24-hour mixed-use development that provides a range of housing opportunities, two hotels, and over 72,091 square feet of retail and restaurant uses in two towers. The Project will also result in the creation of hundreds of temporary and permanent jobs, and will create a new source of revenue for the City through retail sales taxes and hotel transient occupancy taxes. Additionally, the Project's approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core advance the Specific Plan's purpose to create a linked network of open spaces and pathways.

Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations applicable to developments within the Specific Plan. Section 7 includes regulations relating to density, permitted uses, setbacks, lot area and open space.

The maximum FAR for the Site is approximately 13:1, which authorizes up to 1,269,359 square feet of new floor area. The Project would include up to 1,269,150 square feet of new floor area, which complies with the Specific Plan requirements. With respect to maximum residential density, Section 7.G of the Specific Plan states that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC. Therefore, the Project's residential and hotel components comply with the density requirements in the Specific Plan.

The Specific Plan authorizes those uses permitted by the Site's underlying zoning designation (*i.e.*, C2) as well as those uses specifically authorized by the Specific Plan, including, health clubs, outdoor eating areas, hotels, and entertainment and commercial recreation uses. The Project will include a diverse mix of residential, hospitality, restaurant and retail uses. These uses are either permitted under the Specific Plan, or permitted by the Site's zoning.

The Project will develop a portion of the Y-1 Subarea of the Specific Plan. LAMC Section 12.21.G requires 51,625 square feet of open space for the residential uses and the Specific Plan requires 5,000 square feet for the nonresidential uses, for a total of 56,625 square feet. The Project includes approximately 56,881 square feet of open space, including two spacious

public plazas. The Hill Street Plaza is a 17,368 square-foot public plaza at street level on Hill Street. Passengers exiting the Pershing Square Metro Station will arrive at the Hill Street Plaza, which will provide seating areas, landscaped areas and direct access to ground floor amenities. Angels Plaza will be the Project's focal point. Angels Plaza consists of a 16,847 square-foot public plaza with a water feature, landscaped areas, pedestrian paseos and seating areas. Angels Plans will be surrounded by active retail and restaurant uses. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B. Thus, the Project complies with the land use regulations set forth in the Specific Plan.

Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations applicable to developments within the Specific Plan. Section 8 includes regulations relating to setbacks, ground floor treatment and massing.

Section 8.A of the Specific Plan requires compliance with the Design Guidelines. The Project's consistency with the Design Guidelines is described in Section III.E.4, above.

Section 8.B.1 of the Specific Plan regulates setbacks within the Specific Plan area. No setbacks are required on retail streets where the ground floor contains retail uses. Olive Street, 4th Street and Hill Street are all designated as "Retail Streets" per Table 2 in the Specific Plan. Because the Project will include active retail uses on the ground floor, no setbacks are required. As shown on the site plan, the Project buildings will be built to the property line and no setback will be provided in accordance with the Specific Plan.

Section 8.B.2 of the Specific Plan regulates ground floor treatment on Retail Streets. On Olive Street, the Specific Plan requires that 50% of the street frontage be designed to accommodate retail, professional office or live-work uses. On Hill Street and 4th Street, the Specific Plan requires that 75% of the street frontage be designed to accommodate retail, professional office or live-work uses. For the purposes of complying with the Specific Plan and the Design Guidelines, the street frontage shall be calculated excluding any frontage utilized for permitted vehicular access driveways or for access to fixed rail transit stations. Further, the required ground floor space may be located along a courtyard, plaza, or other open space that is visible and accessible from the sidewalk, provided that the retail frontage is visible from the sidewalk.

As shown on the Project plans, the Project is designed to accommodate active ground floor retail uses for 92% of the Hill Street frontage, 66% of the 4th Street Frontage and 11% of the Olive Street frontage. As proposed, the Project will not fully comply with the Specific Plan requirement to provide 75% of street frontage on 4th Street with retail uses and 50% of street frontage on Olive Street. As such, pursuant to Section 6.C of the Specific Plan, the Applicant's entitlement request includes a request for Director's Determination for Alternative Design to

provide relief from the strict application of the Specific Plan Requirements. The findings for the requested Director's Determination for Alternative Design are set forth in Section IV.D, below.

In order to define the public realm, Section 8.B.3 of the Specific Plan includes regulations for massing and street walls. For projects located on Retail Streets, 80% of the project frontage must be lined with a building street wall with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open on up to two sides to a street and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall.

As shown on the Project plans, the Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall. Similarly, the Project plans show Hill Street with a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. Therefore, the Project complies with the Specific Plan's street wall requirements.

Pedestrian Plan

Section 9 of the Specific Plan establishes a plan for an integrated network of pedestrian linkages throughout the Specific Plan area. As shown in Map C of the Specific Plan, future pedestrian connections are designated on the Site along Olive Street and diagonally through the Site from the corner of Hill Street and 4th Street up to the Angels Flight station above Olive Street. The Specific Plan requires pedestrian walkways be constructed at or near the approximate locations designated in the Specific Plan. Pedestrian walkways must be constructed of a hard, durable surface, shall be 15 feet wide at a minimum and 20 feet wide on average, and designed to be wholly contiguous and completely accessible to the public upon full implementation of a linkage between two public rights of way.

Pedestrian connectivity is a priority in the Project's design. The Project will provide the pedestrian pathways shown on Map C in the Specific Plan and additional pedestrian paseos. The Project includes the replacement of the existing staircase along Angels Flight connecting pedestrians from Hill Street to Olive Street and California Plaza. The new staircase will be approximately 16 feet wide and will include a viewing platform of Angels Flight approximately halfway up the staircase. Additionally, a landscaped pedestrian paseo at the Angels Plaza level will provide pedestrian access from the corner of Olive Street and 4th Street to Angels Plaza and the Angels Flight viewing platform. Lastly, a series of staircases and escalators provide easy pedestrian access from the corner of Hill Street and 4th Street diagonally across the Site connecting each terrace and providing access up the hill to Olive street and California Plaza. Accessible access to all areas of the Project will be provided via a series of elevators and ramps.

Based on the foregoing, the Project complies the Pedestrian Plan as set forth in the Specific Plan.

Transportation and Parking

Section 10 of the Specific Plan contains transportation and parking regulations applicable to projects within the Specific Plan area. The regulations in the Specific Plan supersede the transportation and parking requirements set forth in the LAMC. Because the Site is located within 1,500 feet of a fixed rail transit station, there is no minimum required parking for nonresidential uses. For residential uses, the Specific Plan requires that the Project include 0.25 spaces for each dwelling unit with less than 2 habitable rooms and 0.5 spaces for dwelling units with 2 or more habitable rooms. Based on these requirements, a total of 216 parking spaces are required (432 units with 2+ habitable rooms x 0.5 = 216 spaces).

The Project will include up to 750 parking spaces in a three-level subterranean parking garage. In addition, 30 percent of the provided parking spaces would be capable of supporting future EVSE, and 10 percent of the provided parking spaces will have EV charging stations in accordance with LAMC requirements. The proposed parking garage would extend to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent to the Project Site. The number of proposed parking spaces is based on a parking demand factors.

4. The proposed use will not adversely affect the welfare of the pertinent community.

The Project, including the provision for the sale of alcoholic beverages will not adversely affect the welfare of the pertinent community. In fact, the Project will enhance the built form of the surrounding community and provide a service and amenity that benefits the surrounding community. Currently, the Site adversely affects the welfare of the surrounding community. The Site is a fenced off unimproved area that has become an eyesore to the surrounding community. The Project would replace this underutilized property with an iconic mixed-use development that will provide the community with much needed housing, more retail and restaurant uses, and two hotels for out-of-town guests.

The request to permit the sale and dispensing of alcoholic beverages will provide a common amenity for the Project's residents, hotel guests, visitors and the surrounding community. Surrounding uses primarily include a mix of commercial and residential uses. The provision for on- and off-site sales of alcoholic beverages is consistent with other projects of this magnitude. The hotel operator, SBE Group, is globally recognized for its lifestyle hotels that offer entertainment venues and fine dining. Permitting the sale of alcoholic beverages for onsite consumption at the hotels would allow SBE to operate the hotels in a manner consistent with its other hotels in Los Angeles and across the globe. Further, the sale of alcoholic beverages incidental to a meal at the Project's restaurants is a common amenity for downtown restaurants. Other uses that would be permitted to sell alcoholic beverages would include a bar or pub and a retail store, which would be permitted to sell alcoholic beverages for off-site consumption.

(e.g., a resident of the Project purchasing a bottle of wine and returning to their apartment or condominium).

The Applicant will also provide adequate security measures for the Project, including on-site staff and for the hotel and restaurant uses, as well as on-site security, which will ensure that the Project does not adversely affect the pertinent community. Adequate lighting will be provided throughout the Project to ensure a safe environment throughout evening hours. Restaurant employees will be required to comply with industry and state operational requirements for service of alcohol. Further, state law regulates the hours in which beverage service may operate, and standard conditions will be imposed on the Applicant by the Los Angeles Police Department, which include restrictions on time of operation, location, and manner of beverage service.

Based on the foregoing, the Project will not adversely affect the welfare of the pertinent community.

5. The approval of the application will not result in or contribute to an undue concentration of such establishments.

The approval of the application will not result in or contribute to an undue concentration of such establishments. The Project is located in a Regional Center where a variety of alcohol serving uses are permitted and where a concentration of alcohol licenses is expected and appropriate. Specifically, the Project is located in a highly developed neighborhood characterized by hotels, residential structures, and many popular restaurant and nightlife destinations, and rapidly transforming into one of Los Angeles' premier communities with activities available through the day and evening hours. The incidental dispensing of alcoholic beverages for on-site consumption within the hotel and restaurants is considered a standard amenity throughout the hospitality industry. The limited beverage program will be a contribution to neighborhood and should not result in adverse effects in the community or an undue concentration of such establishments.

The requested entitlement is also necessary for the financial and conceptual uses of the Project. Guests and visitors expect the types of amenities provided by comparable mixed-use projects. Granting the requested entitlement will allow the other positive benefits of the Project to be successful. Further, all employees serving or handling alcohol will be properly trained and the Project will be subject to conditions related to the sale and dispensing of alcohol for on-site consumption.

Therefore, the approval of the application will not result in or contribute to an undue concentration of such establishments.

6. The Project will not detrimentally affect nearby residentially zoned communities in the area of the City involved, after giving consideration to the distance of the proposed use from residential buildings, churches, schools,

hospitals, public playgrounds and other similar uses, and other establishments dispensing, for sale or other consideration, alcoholic beverages, including beer and wine.

The Project will not detrimentally affect nearby residentially zoned uses. The Project is located within a prime commercial regional center where a diversity of uses is expected. Hotel and commercial uses are permitted at the Site, and the sale of alcohol in connection with those uses is common and expected. There are several facilities in the immediate vicinity that currently offer alcoholic beverages and do not adversely impact the surrounding residential neighborhood. In fact, it is expected that nearby residents will become Project patrons. Many of the surrounding residential units are housed in mixed use buildings that include alcohol serving uses on the ground floor or nearby.

Thus, approval of the application will not detrimentally affect nearby residential neighborhoods.

C. Conditional Use Permit to Permit Live Entertainment and Dancing Pursuant to LAMC Section 12.24.W.18.

1. The Project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.

The Project will enhance the built environment in the surrounding neighborhood and will provide a function and service that is essential and beneficial to the community, City and region. The Project will replace a vacant underutilized site in the center of Downtown Los Angeles' urban core with a dense mixed-use project including a diverse mix of residential, hospitality, retail and restaurant uses. The Project's residential component will add 432 residential dwelling units to the market supply and the proposed 515 hotel guestrooms will serve tourists, business travelers and convention goers. The proposed retail/restaurant uses will round off a fully integrate mixed-use, transit oriented development.

The requested entitlement to allow live entertainment and dancing within the Project's hotels, restaurants and bar uses provides an amenity to residents, hotel guests and the community. The operator of the hotels, SBE Group, is globally recognized for its lifestyle hotel brand that provide onsite entertainment and fine dining. The requested CUP would allow SBE to operate entertainment venues within the hotels and would permit the use of the hotels' banquet facilities for entertainment and dancing purposes. Further, Angeles Plaza is the ideal spot for live shows and entertainment available to the public. The requested entitlement would permit such community activities, thereby enhancing the built environment and providing a benefit to the community.

Based on the foregoing, allowing live entertainment and dancing at the Project will enhance the built environment and provide service that benefits the Project's residents, hotel guests, visitors and the community.

2. *The Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.*

The Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety. The Site is centrally located in Downtown Los Angeles' urban core and is surrounded by a mix of commercial, residential and cultural uses. The properties immediately north of the Site, on the other side of Angels Flight, are zoned R5-4D and are improved with residential uses. The properties immediately east of the Site are zoned C2-4D and are improved with limited commercial uses and surface parking lots. The properties immediately south of the Site are zoned C2-4D and are improved with multi-family residential uses. And the properties immediately west of the Site are zoned C2-4D and R5-4D and are improved with the California Plaza mixed-use office complex and the Omni Hotel.

The Site's central location makes it a short walk from some of the City's key cultural attractions. The Museum of Contemporary Art, the Broad Museum, the Walt Disney Concert Hall and the Dorothy Chandler Pavilion and the Music Center are all located within a half mile to the northwest of the Site. Grand Park and the City's Civic Center are also a close walk from the Site to the north. Across Hill Street is Grand Central Market and Pershing Square is one block south on Hill Street. Three blocks to the south is 7th Street, which is known as "Restaurant Row". Further south approximately 1.5 miles is the South Park neighborhood and the Staples Center.

The Project consists of a mixed-use development in two towers above a three-level subterranean garage. Tower A will reach a height of 854 feet and will include 180 residential condominium units, 60 apartments and a 260-room SLS hotel. Tower B will reach a height of 494 feet and will include 192 residential apartments, and a 255-room Mondrian Hotel. Both towers share a podium that is activated by retail/restaurant uses. The Project is located adjacent to California Plaza, which features two large office towers, which range in height from 750 feet and 570 feet. There is a planned condo tower located across from the Site on Hill Street, which is expected to be 405 feet. Other structures in the Bunker Hill neighborhood approximate to the Site include: the Wells Fargo Center on Grand Avenue (including 723 feet and 560 feet towers), The Bank of America Center on Hope Street (735 feet), and the US Bank Tower on 5th Street (1,018 feet). Thus, the building form such as bulk, height, and architecture will be compatible with surrounding properties.

Further, the Towers are staggered in a manner that creates a seamless transition from the high-rise buildings on Bunker Hill to the mid-rise buildings to the east in the Historic Core. Thus, the Project is compatible with the surrounding uses and will not have an adverse impact on any surrounding property.

The Applicant will provide adequate security measures for the Project, including on-site staff and for the hotel and restaurant uses, as well as on-site security. Adequate lighting will be provided throughout the Project to ensure a safe environment throughout evening hours.

Based on the foregoing, the Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

3. *The Project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.*

As described below, the Project substantially conforms with the purpose, intent and provisions of the General Plan, the Community Plan and the Specific Plan.

General Plan Framework

The General Plan Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. The Framework Element strategies build upon the historic physical form and character of Los Angeles in a manner that enhances, rather than degrades, the City's and region's environmental resources and quality of life for residents. The Framework Element's strategies are based on the principles of economic opportunity, equity, environmental quality, strategic investment, clear and consistent rules and effective implementation.

Land Use Element

The Site has a Regional Center Commercial General Plan land use designation. Pursuant to the General Plan, Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity. Regional Centers are characterized as providing a diversity of uses. The General Plan encourages mixed-use developments in Regional Centers integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces and amenities. Regional Centers typically provide a significant number of jobs and should function as a hub for regional bus and rail transit. Corresponding zoning designations that are consistent with the Regional Center Commercial land use designation include CR, C1.5, C4 and C2 zones.

The Project is consistent with the intent described in the General Plan for properties with a Regional Center Commercial Land Use designation. And the Site's C2 zoning designation is consistent with the Site's Regional Center Commercial General Plan land use designation. As envisioned by the General Plan, the Project will result in the redevelopment of a vacant site with a mixed-use development integrating housing, and commercial uses. The Project will be a focal point of Downtown Los Angeles, and its central location and adjacency to mass public transit, including the Metro Red and Purple line via the Pershing Square Metro Station, make the

Project a transit hub. Specifically, the Project is consistent with and advances the following goals, objectives and policies of the General Plan Land Use Element.

- **GOAL 3A – A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.**
- **Objective 3.1 – Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.**
- **Objective 3.2 – Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.**
 - Policy 3.2.3 – Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
 - Policy 3.2.4 – Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.
- **Objective 3.4 – Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.**
- **GOAL 3F – Mixed-use centers that provide jobs, entertainment, culture, and serve the region.**
- **Objective 3.10 – Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.**
 - Policy 3.10.3 – Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies, and provide adequate transitions with adjacent residential uses at the edges of the centers.

- Policy 3.10.4 – Provide for the development of public streetscape improvements, where appropriate
- **Objective 3.11** – *Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.*
- **Objective 3.15** – *Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.*
 - Policy 3.15.3 – Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy
 - Policy 3.15.4 – Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.
 - Policy 3.15.4 – Provide for the development of public streetscape improvements, where appropriate.
- **GOAL 3L – Districts that promote pedestrian activity and provide a quality experience for the City's residents.**
- **Objective 3.16** – *Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.*
 - Policy 3.16.3 – Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.

The Project encapsulates the abovementioned goals, objectives and policies. The Project's location adjacent to the Pershing Square Metro station and regional bus lines makes the Project the ideal place for a mixed-use development. The Project promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution. Additionally, the Project's pedestrian oriented design with wide sidewalks and pedestrian linkages between Hill Street and California Plaza promotes an active streetscape where the pedestrian takes priority over the car. The primary entrances for hotel guests, visitors and residents will be via Olive Street and 4th Street in order to minimize curb cuts along Hill Street.

The Project will also be consistent with surrounding uses and create a seamless transition between Bunker Hill to the west and the City's Historic Core to the east. Currently, the Site is

not advancing the goals for the General Plan. It is a vacant and fenced off area. The development of the Project will convert this vacant parcel into a global destination. The addition of 515 hotel rooms will serve tourists visiting nearby cultural attractions like the Walt Disney Concert Hall and Broad Museum, as well as business travelers and convention goers. The proposed housing will increase the supply of for-sale and for rent housing and will provide affordable units.

Housing Element

The Housing Element of the General Plan Framework provides goals and policies to guide future residential development and address issues relating to housing. The Housing Element states that the City must strive to meet the housing needs of the population in a manner that contributes to a stable, safe, and livable neighborhoods, and improves access to jobs and neighborhood services, particularly by encouraging future housing development near transit corridors and stations. The Project is consistent with and advances the following goals, objectives and policies of the Housing Element.

- **GOAL 4A – An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.**
- **Objective 4.2 – Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.**

The Project includes 252 residential apartments (consisting of studio, one-, two- and three-bedroom units), 180 condominium units (consisting of one-, two- and three-bedroom units as well as penthouses), and associated residential amenities. The Development Team is also committed to providing a certain percentage of affordable units in the Project. The proposed unit mix advances the General Plan goal to provide a range of housing opportunities accessible to all residents. The Project's adjacency to the Pershing Square Metro station advances Objective 4.2, and the Project's design creates a seamless transition to higher density developments on Bunker Hill and lower density development to the west in the City's Historic Core.

Urban Form and Neighborhood Design

The Urban Form and Neighborhood Design element of the General Plan Framework focuses on neighborhood identity and livability, and sets out goals and policies for accommodated future growth while preserving the character of existing neighborhoods. The Project is consistent with and advances the following goals, objectives and policies of the Urban Form and Neighborhood Design element.

- **GOAL 5A – A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.**

- **Objective 5.2** – *Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.*
 - Policy 5.2.2 – Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. Additionally, develop these areas so that they are compatible with surrounding neighborhoods.
- **Objective 5.5** – *Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*
- **Objective 5.8** – *Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.*
- **Objective 5.9** – *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*
 - Policy 5.9.1 – Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.
 - Policy 5.9.2 – Encourage mixed-use development which provides for activity and natural surveillance after commercial business hours through the development of ground floor retail uses and sidewalk cafes.

As described herein, the Project is a mixed-use development that will include hospitality, residential, restaurant and retail uses. The Project's proximity to the fixed rail and bus transit promote the General Plan objective to situate new development near transit corridors to promote the use of public transportation. The active uses on the ground floor and surrounding the public plazas will enhance security in the area by putting eyes on the street and creating a walkable environment. The Project's proposed pedestrian linkages and paseos will create a key connection between Bunker Hill and Hill Street. These improvements will also improve livability in the area and benefit the residents in the Project and in the community by improving the walkability and safety of the neighborhood. Further, the contemporary design of the Project builds on the strengths of the existing neighborhood and is consistent with proposed development in the area.

Open Space and Conservation

The Open Space and Conservation Element of the General Plan Framework addresses the outdoor recreational needs of the City's residents. The Project is consistent with and advances the following goals, objectives and policies of the General Plan with respect to Open Space and Conservation.

- **Objective 6.4** – *Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.*
 - Policy 6.4.3 – Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.
 - Policy 6.4.8 – Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.
 - Policy 6.4.11 – Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.

The Project will include approximately 56,881 square feet of open space. Angels Plaza will be the focal point of the Project's open space and will provide a 16,847 square-foot public plaza with landscaped areas, seating areas and a water feature. The Project will also include a 17,368 square-foot public plaza at Hill Street. Other publicly accessible open space includes a new decorative staircase connecting Hill Street to Olive Street, an extension of California Plaza, and rooftop terraces totaling 17,398 square feet.

Economic Development

The City's fundamental economic development goals are to provide the physical locations and competitive financial environment necessary to attract various types of economic development to Los Angeles, and to encourage the geographic distribution of job growth in a manner supportive of the City's overall planning objectives. The Project is consistent with and advances the following goals, objectives and policies set forth in the General Plan relating to Economic Development.

- **GOAL 7A – A vibrant economically revitalized City.**
- **Objective 7.2** – *Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.*
 - Policy 7.2.2 – Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.
 - Policy 7.2.3 – Encourage new commercial development in proximity to rail and bus transit corridors and stations.
- **GOAL 7G – A range of Housing options in the City.**
- **Objective 7.9** – *Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.*
 - Policy 7.9.2 – Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.

The Project will have a direct positive impact on economic development by creating hundreds of temporary and permanent jobs. The Project will also generate significant revenues for the City in the form of sales taxes from the commercial uses and transient occupancy taxes from the hotel uses. Consistent with Goal 7G and Objective 7.9, the Project will provide a range of housing types located adjacent to mass transit and near community services.

Transportation

The City of Los Angeles is recognized worldwide for the high level of mobility of its people. This level of mobility has been made possible by intense investment in the transportation system over the past half century. Investments in the highway and freeway system, the transit system, Los Angeles International Airport, the Port of Los Angeles, and the railroad system have contributed, not only to growth in individual mobility, but also to economic growth that has made Los Angeles one of the great economic centers of the world. Los Angeles has truly become a major center for national and international trade and tourism, and an important hub for international air travel.

The Project is consistent with and advances the goals of the City's Transportation Element. The Transportation Element recognizes the importance of maximizing the efficiency of existing and proposed infrastructure through advanced transportation technology, reducing vehicle trips and

miles traveled and by encouraging new development near transit centers. The Project exemplifies the type of project envisioned by the Transportation Element. The Pershing Square Metro Station is an integrated component of the Project. Additionally, the Project is located less than a mile away from the 7th Street Metro station, which provides regional connections to the Metro's Red, Purple, Blue and Exposition lines. Further, over ten regional and local bus lines serve the Project offering connections throughout Los Angeles County. Lastly, the Project is located walking distance to several local attractions, further encouraging the use of alternative modes of transportation and reducing congestion on the City's roadway network.

Community Plan

The City has adopted 35 community plans, which collectively, comprise the General Plan Land Use Element. The Site is located within the Central City Community Plan. More specifically, the Site is located in the Bunker Hill District, one out of nine distinct land use districts in the Community Plan area. The Community Plan is the official guide to future development within the Community Plan area. As described in more detail below, the Project is consistent with and advances the goals, objectives, policies and programs set forth in the Community Plan.

Land Use Policies and Programs

The Project is consistent with and advances the following land use goals, objectives and policies.

- **Objective 1-3** – *To foster development which can accommodate a full range of incomes.*
 - Policy 1-3.1 – Encourage a cluster of neighborhood design comprised of housing and services.
- **Objective 2-1** – *To improve Central City's competitiveness as a location for offices, business, retail, an industry.*
 - Policy 2-1.2 – To maintain a safe, clean, attractive and lively environment.
- **Objective 2-3** – *To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows and tourism.*
- **Objective 2-4** – *To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.*
 - Policy 2-4.1 – Promote night life activity by encouraging restaurants, pubs, night clubs, small theatres, and other specialty uses to reinforce existing pockets of activity.
- **Objective 4-1** – *To encourage the expansion and additions of open spaces as opportunities arise.*
- **Objective 4-4** – *To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.*

- Policy 4-4.1 – Improve Downtown's pedestrian environment in recognition of its important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers and visitors.

The Project will replace a vacant and underutilized site with over one million square feet of new commercial and residential uses. The dwelling unit types and price points of the Project's residential component, including affordable housing comprising five percent of the total for-rent units, provides housing options for a range of income levels. The mixed-use nature of the Project creates a neighborhood cluster where hotel guests and residents have nearby access to community services. Further the inclusion of an SLS Hotel and Mondrian Hotel will make the Project a global destination and advance the Community Plan's objective to create a 24-hour environment. In furtherance of Objective 4-4 and Policy 4-4.1, the Project's approximately 56,881 square feet of open space and landscaped pedestrian paseos will significantly increase the pedestrian environment.

Transportation and Circulation

The Project is consistent with and advances the following transportation and circulation goals, objectives and policies.

- **Objective 11-3** – *To provide an internal circulation system with a focus of connecting specific pairs of activity centers to a system that provides greater geographic coverage of Downtown, thus giving Downtown travelers more choices and more flexibility.*
- **Objective 11-6** – *To accommodate pedestrian open space and usage in Central City.*

The Project will create a key pedestrian linkage connecting California Plaza and Bunker Hill to Hill Street and the City's Historic Core through a series of pedestrian paseos, staircases, escalators and elevators. Beyond these critical local connections, the adjacent Pershing Square Metro station and a series of local and regional bus lines provide the downtown traveler with easy access to other areas of Downtown and the greater Los Angeles area.

Specific Plan

As described below, the Project is consistent with and advances the purposes of the Specific Plan and substantially complies with the development and design regulations set forth therein.

Specific Plan Purpose and Intent

Section 2 of the Specific Plan describes the purposes of the Specific Plan, which include:

- Create a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment;
- Reinforce and enhance the district's identity as the cultural center of the region;
- Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region;
- Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces;

- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use;
- Create a transit-friendly environment by requiring conformance to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses; and
- Support the improvement of the business environment by providing an attractive public realm.

The Project advances the purposes of the Specific Plan by redeveloping a vacant site with a 24-hour mixed-use development that provides a range of housing opportunities, two hotels, and over 72,091 square feet of retail and restaurant uses in two towers. The Project will also result in the creation of hundreds of temporary and permanent jobs, and will create a new source of revenue for the City through retail sales taxes and hotel transient occupancy taxes. Additionally, the Project's approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core advance the Specific Plan's purpose to create a linked network of open spaces and pathways.

Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations applicable to developments within the Specific Plan. Section 7 includes regulations relating to density, permitted uses, setbacks, lot area and open space.

The maximum FAR for the Site is approximately 13:1, which authorizes up to 1,269,150 square feet of new floor area. The Project would include up to 1,269,150 square feet of new floor area, which complies with the Specific Plan requirements. With respect to maximum residential density, Section 7.G of the Specific Plan states that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC. Therefore, the Project's residential and hotel components comply with the density requirements in the Specific Plan.

The Specific Plan authorizes those uses permitted by the Site's underlying zoning designation (*i.e.*, C2) as well as those uses specifically authorized by the Specific Plan, including, health clubs, outdoor eating areas, hotels, and entertainment and commercial recreation uses. The Project will include a diverse mix of residential, hospitality, restaurant and retail uses. These uses are either permitted under the Specific Plan, or permitted by the Site's zoning.

The Project will develop a portion of the Y-1 Subarea of the Specific Plan. LAMC Section 12.21.G requires 51,625 square feet of open space for the residential uses and the Specific Plan requires 5,000 square feet for the nonresidential uses, for a total of 56,625 square feet. The Project includes approximately 56,881 square feet of open space, including two spacious public plazas. The Hill Street Plaza is a 17,368 square-foot public plaza at street level on Hill Street. Passengers exiting the Pershing Square Metro Station will arrive at the Hill Street Plaza, which will provide seating areas, landscaped areas and direct access to ground floor amenities.

Angels Plaza will be the Project's focal point. It consists of a 16,847 square-foot public plaza with a water feature, landscaped areas, pedestrian paseos and seating areas. Angels Plaza will be surrounded by active retail and restaurant uses. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B. The proposed landscape plan is included in this application.

As described above, the Project substantially complies with the land use regulations set forth in the Specific Plan.

Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations applicable to developments within the Specific Plan. Section 8 includes regulations relating to setbacks, ground floor treatment and massing.

Section 8.A of the Specific Plan requires compliance with the Design Guidelines. The Project's consistency with the Design Guidelines is described in Section III.E.4, above.

Section 8.B.1 of the Specific Plan regulates setbacks within the Specific Plan area. No setbacks are required on retail streets where the ground floor contains retail uses. Olive Street, 4th Street and Hill Street are all designated "Retail Streets" per Table 2 in the Specific Plan. Because the Project will include active retail uses on the ground floor, no setbacks are required. As shown on the site plan, the Project buildings will be built to the property line and no setback will be provided in accordance with the Specific Plan.

Section 8.B.2 of the Specific Plan regulates ground floor treatment on Retail Streets. On Olive Street, the Specific Plan requires that 50% of the street frontage be designed to accommodate retail, professional office or live-work uses. On Hill Street and 4th Street, the Specific Plan requires that 75% of the street frontage be designed to accommodate retail, professional office or live-work uses. For the purposes of complying with the Specific Plan and the Design Guidelines, the street frontage shall be calculated excluding any frontage utilized for permitted vehicular access driveways or for access to fixed rail transit stations. Further, the required ground floor space may be located along a courtyard, plaza, or other open space that is visible and accessible from the sidewalk, provided that the retail frontage is visible from the sidewalk.

As shown on the Project plans, the Project is designed to accommodate active ground floor retail uses for 92% of the Hill Street frontage, 32% of the 4th Street Frontage and 11% of the Olive Street frontage. As proposed, the Project will not fully comply with the Specific Plan requirement to provide 75% of street frontage on 4th Street with retail uses and 50% of street frontage on Olive Street. As such, pursuant to Section 6.C of the Specific Plan, the Applicant's entitlement request includes a request for Director's Determination for Alternative Design to provide relief from the strict application of the Specific Plan Requirements. The findings for the requested Director's Determination for Alternative Design are set forth in Section IV.D, below.

In order to define the public realm, Section 8.B.3 of the Specific Plan includes regulations for massing and street walls. For projects located on Retail Streets, 80% of the project frontage must be lined with a building street wall with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open on up to two sides to a street and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall.

As shown on the Project plans, the Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall. Similarly, the Project plans show Hill Street with a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. Therefore, the Project complies with the Specific Plan's street wall requirements.

Pedestrian Plan

Section 9 of the Specific Plan establishes a plan for an integrated network of pedestrian linkages throughout the Specific Plan area. As shown in Map C of the Specific Plan, future pedestrian connections are designated on the Site along Olive Street and diagonally through the Site from the corner of Hill Street and 4th Street up to the Angels Flight station above Olive Street. The Specific Plan requires pedestrian walkways be constructed at or near the approximate locations designated in the Specific Plan. Pedestrian walkways must be constructed of a hard, durable surface, shall be 15 feet wide at a minimum and 20 feet wide on average, and designed to be wholly contiguous and completely accessible to the public upon full implementation of a linkage between two public rights of way.

Pedestrian connectivity is a priority in the Project's design. The Project will provide the pedestrian pathways shown on Map C in the Specific Plan and additional pedestrian paseos. The Project includes the replacement of the existing staircase along Angels Flight connecting pedestrians from Hill Street to Olive Street and California Plaza. The new staircase will be approximately 16 feet wide and will include a viewing platform of Angels Flight approximately halfway up the staircase. Additionally, a landscaped pedestrian paseo at the Angel's Plaza level will provide pedestrian access from the corner of Olive Street and 4th Street to Angel's Plaza and the Angels Flight viewing platform. Lastly, a series of staircases and escalators provide easy pedestrian access from the corner of Hill Street and 4th Street diagonally across the Site connecting each terrace and providing access up the hill to Olive street and California Plaza. Accessible access to all areas of the Project will be provided via a series of elevators and ramps.

Based on the foregoing, the Project complies the Pedestrian Plan as set forth in the Specific Plan.

Transportation and Parking

Section 10 of the Specific Plan contains transportation and parking regulations applicable to projects within the Specific Plan area. The regulations in the Specific Plan supersede the transportation and parking requirements set forth in the LAMC. Because the Site is located within 1,500 feet of a fixed rail transit station, there is no minimum required parking for nonresidential uses. For residential uses, the Specific Plan requires that the Project include 0.25 spaces for each dwelling unit with less than 2 habitable rooms and 0.5 spaces for dwelling units with 2 or more habitable rooms. Based on these requirements, a total of 216 parking spaces are required (432 rooms with 2+ habitable rooms x 0.5 = 216 spaces).

The Project will include up to 750 parking spaces in a three-level subterranean parking garage. In addition, 30 percent of the provided parking spaces would be capable of supporting future EVSE, and 10 percent of the provided parking spaces will have EV charging stations in accordance with LAMC requirements. The proposed parking garage would extend to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent to the Project Site. The number of proposed parking spaces is based on a parking demand factors.

D. Director's Determination for Alternative Design Pursuant to Section 6.C of the Specific Plan.

1. The Project substantially complies with the applicable regulations, findings, standards and provisions of the Specific Plan.

As described below, the Project is consistent with and advances the purposes of the Specific Plan and substantially complies with the development and design regulations set forth therein.

Specific Plan Purpose and Intent

Section 2 of the Specific Plan describes the purposes of the Specific Plan, which include:

- Create a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment;
- Reinforce and enhance the district's identity as the cultural center of the region;
- Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region;
- Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces;
- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Support the expansion of the regional transit network through an urban form and mix of land uses that support high levels of transit use;

- Create a transit-friendly environment by requiring conformance to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses; and
- Support the improvement of the business environment by providing an attractive public realm.

The Project advances the purposes of the Specific Plan by redeveloping a vacant site with a 24-hour mixed-use development that provides a range of housing opportunities, two hotels, and over 72,091 square feet of retail and restaurant uses in two towers. The Project will also result in the creation of hundreds of temporary and permanent jobs, and will create a new source of revenue for the City through retail sales taxes and hotel transient occupancy taxes. Additionally, the Project's approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core advance the Specific Plan's purpose to create a linked network of open spaces and pathways.

Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations applicable to developments within the Specific Plan. Section 7 includes regulations relating to density, permitted uses, setbacks, lot area and open space.

The maximum FAR for the Site is approximately 13:1, which authorizes up to 1,269,150 square feet of new floor area. The Project would include up to 1,269,150 square feet of new floor area, which complies with the Specific Plan requirements. With respect to maximum residential density, Section 7.G of the Specific Plan states that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC. Therefore, the Project's residential and hotel components comply with the density requirements in the Specific Plan.

The Specific Plan authorizes those uses permitted by the Site's underlying zoning designation (*i.e.*, C2) as well as those uses specifically authorized by the Specific Plan, including, health clubs, outdoor eating areas, hotels, and entertainment and commercial recreation uses. The Project will include a diverse mix of residential, hospitality, restaurant and retail uses. These uses are either permitted under the Specific Plan, or permitted by the Site's zoning.

Further, the Specific Plan requires projects to provide a 1 square foot of open space for each 100 square feet of non-residential floor area, but is not required to exceed a 5,000 square feet. Open space shall incorporate usable open space that is visible and accessible from the sidewalk and that include pedestrian amenities such as focal points, gathering places, and landscaped areas. A 50 percent reduction in the total amount of open space otherwise required by LAMC Section 12.21.G will be granted if a project includes open space that meets the following requirements:¹¹ (a) a minimum of 5,000 square feet in size; (b) located on the ground level with direct pedestrian connection to adjacent street; (c) unenclosed by any wall, fence, gate, or other obstruction; (d) lined with ground floor spaces designed for retail, especially restaurants that include outdoor dining, and/or cultural uses, along at least 20 percent of its

¹¹ Specific Plan Section 7(F).

building frontage; (e) at least 40 percent landscaped, including usable lawn or lawn alternative as part of the landscaping treatment; and (f) includes at least one gathering place with fountain or other focal element.

Pursuant to Specific Plan Section 7(F)2, the Project is only required to provide a maximum of 5,000 square feet of open space for the non-residential floor area. Residential floor area is subject to LAMC Section 12.21.G for a required total of 51,625 square feet. Thus, the Project is required to include a total of 56,625 square feet of open space. As shown on the Project plans, the Project will include approximately 56,881 square feet of open space, including two spacious public plazas. The Hill Street Plaza is a 17,368 square-foot public plaza at street level on Hill Street. Passengers exiting the Pershing Square Metro Station will arrive at the Hill Street Plaza, which will provide seating areas, landscaped areas and direct access to ground floor amenities. Angels Plaza will be the Project's focal point. It consists of a 16,847 square-foot public plaza with a water feature, landscaped areas, pedestrian paseos and seating areas. Angels Plaza will be surrounded by active retail and restaurant uses. Additional open space includes an extension of the Upper Cal Plaza, a new terrace, and a new plaza on Olive Street with a combined total of 17,398 square feet, as well as 5,268 square feet of private open space for residents in Tower B. The proposed landscape plan is included in this application.

As described above, the Project substantially complies with the land use regulations set forth in the Specific Plan.

Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations applicable to developments within the Specific Plan. Section 8 includes regulations relating to setbacks, ground floor treatment and massing.

Section 8.A of the Specific Plan requires compliance with the Design Guidelines. The Project's consistency with the Design Guidelines is described in Section III.E.4, above.

Section 8.B.1 of the Specific Plan regulates setbacks within the Specific Plan area. No setbacks are required on retail streets where the ground floor contains retail uses. Olive Street, 4th Street and Hill Street are all designated as "Retail Streets" per Table 2 in the Specific Plan. Because the Project will include active retail uses on the ground floor, no setbacks are required. As shown on the site plan, the Project buildings will be built to the property line and no setback will be provided in accordance with the Specific Plan.

Section 8.B.2 of the Specific Plan regulates ground floor treatment on Retail Streets. On Olive Street, the Specific Plan requires that 50% of the street frontage be designed to accommodate retail, professional office or live-work uses. On Hill Street and 4th Street, the Specific Plan requires that 75% of the street frontage be designed to accommodate retail, professional office or live-work uses. For the purposes of complying with the Specific Plan and the Design Guidelines, the street frontage shall be calculated excluding any frontage utilized for permitted

vehicular access driveways or for access to fixed rail transit stations. Further, the required ground floor space may be located along a courtyard, plaza, or other open space that is visible and accessible from the sidewalk, provided that the retail frontage is visible from the sidewalk.

As shown on the Project plans, the Project is designed to accommodate active ground floor retail uses for 92% of the Hill Street frontage, 32% of the 4th Street Frontage and 11% of the Olive Street frontage. As proposed, the Project will not fully comply with the Specific Plan requirement to provide 75% of street frontage on 4th Street with retail uses and 50% of street frontage on Olive Street. As such, pursuant to Section 6.C of the Specific Plan, the Applicant's entitlement request includes a request for Director's Determination for Alternative Design to provide relief from the strict application of the Specific Plan requirements for Retail Streets Olive and 4th.

In order to define the public realm, Section 8.B.3 of the Specific Plan includes regulations for massing and street walls. For projects located on Retail Streets, 80% of the project frontage must be lined with a building street wall with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open on up to two sides to a street and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall.

As shown on the Project plans, the Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall. Similarly, the Project plans show Hill Street with a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. Therefore, the Project complies with the Urban Design Regulation of the Specific Plan.

Pedestrian Plan

Section 9 of the Specific Plan establishes a plan for an integrated network of pedestrian linkages throughout the Specific Plan area. As shown in Map C of the Specific Plan, future pedestrian connections are designated on the Site along Olive Street and diagonally through the Site from the corner of Hill Street and 4th Street up to the Angels Flight station above Olive Street. The Specific Plan requires pedestrian walkways be constructed at or near the approximate locations designated in the Specific Plan. Pedestrian walkways must be constructed of a hard, durable surface, shall be 15 feet wide at a minimum and 20 feet wide on average, and designed to be wholly contiguous and completely accessible to the public upon full implementation of a linkage between two public rights of way.

Pedestrian connectivity is a priority in the Project's design. The Project will provide the pedestrian pathways shown on Map C in the Specific Plan and additional pedestrian paseos. The Project includes the replacement of the existing staircase along Angels Flight connecting pedestrians from Hill Street to Olive Street and California Plaza. The new staircase will be

approximately 16 feet wide and will include a viewing platform of Angels Flight approximately halfway up the staircase. Additionally, a landscaped pedestrian paseo at the Angel's Plaza level will provide pedestrian access from the corner of Olive Street and 4th Street to Angel's Plaza and the Angels Flight viewing platform. Lastly, a series of staircases and escalators provide easy pedestrian access from the corner of Hill Street and 4th Street diagonally across the Site connecting each terrace and providing access up the hill to Olive Street and California Plaza. Accessible access to all areas of the Project will be provided via a series of elevators and ramps.

Based on the foregoing, the Project complies the Pedestrian Plan as set forth in the Specific Plan.

Transportation and Parking

Section 10 of the Specific Plan contains transportation and parking regulations applicable to projects within the Specific Plan area. The regulations in the Specific Plan supersede the transportation and parking requirements set forth in the LAMC. Because the Site is located within 1,500 feet of a fixed rail transit station, there is no minimum required parking for nonresidential uses. For residential uses, the Specific Plan requires that the Project include 0.25 spaces for each dwelling unit with less than 2 habitable rooms and 0.5 spaces for dwelling units with 2 or more habitable rooms. Based on these requirements, a total of 216 parking spaces are required (432 rooms with 2+ habitable rooms x 0.5 = 216 spaces).

The Project will include up to 750 parking spaces in a three-level subterranean parking garage. In addition, 30 percent of the provided parking spaces would be capable of supporting future EVSE, and 10 percent of the provided parking spaces will have EV charging stations in accordance with LAMC requirements. The proposed parking garage would extend to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent to the Project Site. The number of proposed parking spaces is based on a parking demand factors.

Thus, based on the foregoing, the Project substantially complies with the applicable regulations, findings, standards and provisions of the Specific Plan with approval of the Director's Determination for Alternative Design.

2. The Project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the Project, to the extent physically feasible.

On March 29, 2019, the City published a Notice of Preparation and Initial Study for the Project. The City will prepare an Environmental Impact Report ("EIR") for the Project and will plan to publish the EIR winter 2020. The Mitigation Monitoring and Reporting Program will incorporate mitigation measures, monitoring measures when necessary, or alternatives identified in the

environmental review which would mitigate the negative environmental effects of the Project, to the extent physically feasible.

3. *The Project conforms with the purposes and intent of the urban design regulations required by Section 8 of the Specific Plan.*

Section 8 of the Specific Plan sets forth the urban design standards applicable to developments within the Specific Plan. Section 8 includes regulations relating to setbacks, ground floor treatment, and massing and street wall as well as the provisions of the Downtown Design Guide. These regulations and provisions address the following purposes of the Specific Plan, as described in Section 2:

- Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces;
- Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways;
- Create a transit-friendly environment by requiring conformance to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses; and
- Support the improvement of the business environment by providing an attractive public realm.

The Project advances the purposes of the Specific Plan by redeveloping a vacant site with a 24-hour mixed-use development that provides a range of housing opportunities, two hotels, and over 72,091 square feet of retail and restaurant uses. The design includes a high quality built form. Key elements of the design of the Project include the re-interpretation of the arrival plaza at Metro's Pershing Square Station, enhancing the pedestrian experience of riding the Angels Flight funicular, and creating a more lively pedestrian experience to and from California Plaza and its adjacent office buildings. To this end, the Project's design consists of two towers as well as a series of cantilevered floors and landscaped terraces that gradually transition from the lowest point of the Site at Hill Street and 4th Street up to California Plaza. The building materials that are intended for the exterior of the Project would consist of various types of glass panels, metal balustrades and screening elements, and plaster, and at the podium level, additional materials such as stone and terra cotta. The palette and color scheme for the Project consists of light and warm tones.

As noted above, key components to the design of the Project include the integration of the existing Metro Pershing Square Station and the adjacent historic Angels Flight funicular. With regard to Metro's Pershing Square Station, the Project includes a standalone café located next to the Metro Portal.

The Project's design emphasizes a respectful relationship to Angels Flight. Specifically, Tower A is intentionally placed on Hill Street, near the Angels Flight portal, much like the historic buildings that were the funicular's immediate neighbors in the past. Tower A would also be set

back approximately 10 feet from the shared property line with Angels Flight to showcase the track. The existing stairs along Angels Flight would be replaced with a new, enhanced and landscaped version of the stair that connects Hill Street to Olive Street and California Plaza, preserving the close-up experience of Angels Flight that exists today. In addition, Tower A would not be full height for the full length of Angels Flight. For the upper portion of the track, Tower A would step down to approximately eight stories. The northwest end of Tower A would be set back approximately 50 feet from California Plaza, providing space and relief for the upper station of Angels Flight, and allowing views for riders at the top toward the Project's open space and the City beyond, and to allow reciprocating views from the Project's open space back to the upper station. Along the track at most floors, Tower A would feature windows facing Angels Flight, as it had earlier in its history. Residential lobbies located one level above Hill Street would provide views directly over the lower portal. Up one level at the hotel banquet floor, would be meeting spaces toward the Hill Street side that would also provide views of Angels Flight. Toward the top, hotel rooms with balconies would face the track, restoring the intimate personal relationship between building occupants and riders historically had with one another. Located about mid-way up the track, a double height lobby and lounge would have a full height window wall facing Angels Flight. At the street level, the retail storefront would be set back from the Hill Street sidewalk near the lower portal. This would open up views to the portal for those walking along Hill Street and would provide a queuing area at the lower station.

Additionally, the Project's approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core advance the Specific Plan's purpose to create a linked network of open spaces and pathways. Pedestrian access would be enhanced along the perimeter and throughout the Project Site and would be provided via new pedestrian walkways from 4th Street, Olive Street, and Hill Street. The landscaped terraces would feature stairs, escalators, and elevators that would connect the levels and surrounding streets. A pedestrian paseo proposed at 4th Street and Olive Street would be a key pedestrian access point to the Project Site. This paseo would extend from the corner of 4th Street and Olive Street to a new staircase next to Angels flight. Overall, pedestrian access to the Project Site would be provided via steps along Angels Flight, connecting Hill Street to Olive Street and California Plaza, pedestrian paseos and the various terraced levels connecting the Project to the surrounding uses and streets.

In order to define the public realm, Section 8.B.3 of the Specific Plan includes regulations for massing and street walls. For projects located on Retail Streets, 80% of the project frontage must be lined with a building street wall with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open on up to two sides to a street and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall.

The Project complies with the Specific Plan's street wall requirements by lining 80% of the project frontage with a building street wall with a minimum street wall height of 25 feet. As shown on the Project plans, the Project includes a building street wall along nearly all of Olive

Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall. Similarly, the Project plans show Hill Street with a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. This street wall configuration conforms to pedestrian oriented design guidelines that promote consistent street walls and active ground floor uses.

Based on the foregoing, the Project substantially conforms with the purposes and intent of the urban design regulations required by Section 8 of the Specific Plan.

4. There are special circumstances applicable to the project or project site which make strict application of the urban design regulations impractical.

The Project substantially complies with the applicable regulations, findings, standards and provisions of the Specific Plan. However, due to special circumstances applicable to the Project and the Site, the Applicant is requesting a Director's Determination for Alternative Design pursuant to Section 6.C of the Specific Plan to provide relief from the Retail Streets Requirement of the design regulations set forth in Section 8 of the Specific Plan.

The Specific Plan sets forth requirements for ground floor treatment. As described above, Hill Street, Olive Street, and 4th Street are designated as Retail Streets in the Specific Plan. As described in Section III.E.3.c.ii, above, the Project does not comply with the Specific Plan requirement that 75% of the ground floor space on 4th Street be designed to accommodate retail or professional office uses. This is due, in part, to the location of the Metro Pershing Square Station portal on the corner of Hill Street and 4th Street, which occupies a portion of both streets' frontage space. The topography along 4th Street also constrains the Project's ability to meet the 75% requirement at the ground floor. Nevertheless, the hotel lobby and elevator lobby fronting 4th Street engages the pedestrian realm, though it would not neatly qualify as retail, professional office or live-work use under the Specific Plan. Additionally, the emphasis in the Specific Plan on open space and pedestrian linkages is reflected in the Project's design in the approximately 56,881 square feet of open space and the multiple pedestrian connections from Bunker Hill to the Historic Core, including the North Paseo at the corner of Olive and 4th that pulls pedestrians in from the street corner into the Site's Angels Terrace which is lined with retail/restaurant uses. While this advances the Specific Plan's purpose to create a linked network of open spaces and pathways, it also requires a reduction in retail street frontage so that the open spaces and pathways into and through the Site are easily identifiable and accessible. Finally, the driveways needed to accommodate the vehicular traffic of residents, visitors, and businesses on the Site also reduce the street frontage available for retail uses, especially on Olive Street, where the street's location at the top of the sloping site makes it the most feasible place to put driveways to the subterranean parking structure and back of house loading entry. Placing the driveway and loading access on Olive Street is preferable to locating it on 4th and Hill as it is a minor street compared to the busier 4th and Hill roadways.

Based on the foregoing, the special circumstances applicable to the Project and Site make strict application of the retail street frontage regulations impractical.

5. *In granting the request, the Director has imposed project requirements and/or decided that the proposed Project will substantially comply with all other applicable Specific Plan regulations.*

Prior to approval of the Project, the Planning Department and the Director have the ability to review the Project and determine whether the Project will substantially comply with all other applicable Specific Plan regulations. At that time, the Director shall impose necessary requirements on the Project in order to ensure the Project's consistency with the Specific Plan. As such, the Project will incorporate any feasible project requirements imposed by the Director, and thereby substantially comply with all other applicable Specific Plan regulations.

6. *In granting the request, the Director has considered and found no detrimental effects of the proposed Project on surrounding properties and public rights-of-way.*

Prior to approval of the Project, the Planning Department and the Director have the ability to review the Project and determine whether the Project will have any detrimental effects on surrounding properties and public rights-of-way. The Applicant's request for a Director's Determination for Alternative Design to deviate from certain aspects of the urban design regulations set forth in Section 8 of the Specific Plan, including the Retail Street Requirements, will not have any detrimental effects on surrounding properties and public rights-of-way. The Project's contemporary architecture complements and enhances the surrounding developments and provides a seamless transition for the high-rise buildings atop Bunker Hill and the mid-rise buildings to the east in the Historic Core. Key elements of the Project's design include the re-interpretation of the arrival plaza at Metro's Pershing Square Station, enhancing the pedestrian experience of riding the Angels Flight funicular, and creating a more lively pedestrian experience to and from California Plaza and its adjacent office buildings. This emphasis on creating an inviting and accessible space requires a reduction in the amount of landscaping in the open space areas, an increase in parking to accommodate the Project's residents and visitors, and a reduction in retail street frontage to accommodate the Site's pedestrian pathways, the Metro Pershing Square portal, and the Site's slope.

Furthermore, after considering the Project, the Director shall impose any necessary requirements on the Project in order to ensure the Project will have no detrimental effects on surrounding properties and public rights-of-way. As such, the Project will incorporate any project requirements imposed by the Director, and thereby it will not have any detrimental effects on surrounding properties and public rights-of-way.



PHOTOGRAPH LOCATION MAP

ANGELS LANDING



VIEW 1: View southwest from Hill Street



VIEW 2: View northwest from Hill Street



VIEW 3: View north from Hill Street



VIEW 4: View north from the corner of Hill Street and 4th Street

ANGELS LANDING



VIEW 5: View northeast from Hill Street



VIEW 6: View east from 4th Street



VIEW 7: View northeast from corner of 4th Street and Olive



VIEW 8: View northeast from Olive Street under Cal Plaza

ANGELS LANDING



VIEW 9: View south from Cal Plaza across Olive Street



VIEW 10: View southeast from Cal Plaza



VIEW 11: View southeast from Cal Plaza looking over Angels Flight



VIEW 12: View south from Cal Plaza

ANGELS LANDING



Alan Como <alan.como@lacity.org>

Angels Landing Project -- ENV-2018-3273-EIR

John H. Welborne <john@welborne.net>

Mon, Mar 1, 2021 at 2:49 PM

To: alan.como@lacity.org

Cc: Charles Shumaker <Shumaker@smcounsel.com>, Kevin Roberts <kroberts@macfarlanepartners.com>

Dear Mr. Como:

I attach a letter from the Angels Flight® Railway Foundation indicating that the Foundation, the immediate next-door neighbor to the project, supports the Angels Landing project and urges the City to approve it.

Please "Reply" as soon as possible to confirm that you have received this letter for the DEIR file.

— John H. Welborne / 323-935-1914

**AFRF to City re Angels Landing DEIR.pdf**

377K

ANGELS FLIGHT[™] RAILWAY FOUNDATION

CALIFORNIA PLAZA, LOS ANGELES
BUNKER HILL POST OFFICE BOX 712345
LOS ANGELES, CALIFORNIA 90071

March 1, 2021

By E-Mail: alan.como@lacity.org

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re: Angels Landing Project; Case No. ENV-2018-3273-EIR

Dear Mr. Como:

The Angels Flight[®] Railway Foundation ("AF") will be next-door neighbor to the project (the "Project") proposed by Angels Landing Partners, LLC ("AL") if the City of Los Angeles sells to AL the former CRA property south of the property now owned by AF and occupied by the historic Angels Flight[®] Railway. AF is a California nonprofit corporation charged with stewardship of the Railway for the benefit of the community. AF also is effectuating the legacy of the City of Los Angeles's official 1981 bicentennial committee, the Los Angeles 200 Committee, whose monument and time capsule are to be incorporated as part of the overall California Plaza development, near the top of Angels Flight[®].

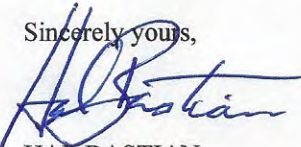
For several years, representatives of AL and AF have discussed items of mutual concern relating to the adjacency of their properties, future construction upon them, future operation of them, and similar matters. AF also has reviewed the Draft Environmental Impact Report (DEIR) prepared for the Project. Please consider the following comments in your and other City decision-makers' ensuing environmental and other reviews for the Project.

Community Benefits. AF is very pleased that AL will provide certain community benefits that address matters of community concern, including relocating the official *Los Angeles Bicentennial Monument* to a new, permanent location on the Upper Plaza level of the Project, overlooking Angels Flight[®]. In addition, AL will provide the community benefit of an *Angels Flight[®] Museum and Store* on the Lower Plaza level of the AL property, overlooking the Angels Flight[®] right-of-way, to fulfill the original California Plaza master plan requirement for a local history museum (and subject to final negotiations and AL's review of AF's viable business plan for museum and store operations). Finally, and also as contemplated in the master plan for California Plaza, AL has agreed to *improve pedestrian linkage* by modifying slightly the Project's Upper Plaza design to better connect our two properties near the location of the Angels Flight[®] Station House. Also, AL's proposed design for the Project improves public pedestrian linkages up and down Bunker Hill and between the Project and the Railway at various elevations and is respectful of vistas of the Railway from multiple points on and around the Project.

Common Boundary and Miscellaneous Matters. AF believes that a few minor design modifications to the Project possibly are needed along the common boundary line, and discussions are continuing between AF and AL on such matters, including fencing at the common boundary. Also, AF will remain in discussion with AL, as the Project design evolves, concerning matters of mutual concern such as signage, coordination of security, landscaping adjacent to each other's property, and support from, and coordination with, AF for the construction of AL's Project.

Therefore, based on the above and the ongoing coordination between AF and AL, we support the Angels Landing project and urge the City to approve it.

Sincerely yours,



HAL BASTIAN

President

Angels Flight[®] Railway Foundation

cc: Directors, AFRF

Charles Shumaker, Esq.

John H. Welborne, Esq.

Kevin Roberts, Angels Landing Partners, LLC