

## APPLICATIONS



### APPEAL APPLICATION Instructions and Checklist

#### RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

#### PURPOSE

This application is for the appeal of Los Angeles City Planning determinations, as authorized by the LAMC, as well as first-level Building and Safety Appeals.

#### APPELLATE BODY

**Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.**

- ☐ Area Planning Commission (APC)    ☐ City Planning Commission (CPC)    ☒ City Council  
☐ Zoning Administrator (ZA)    ☐ Director of Planning (DIR)

#### CASE INFORMATION

**Case Number:** CPC-2107-505-TDR-ZV-SPPA-DD-SPR

**Project Address:** 754 S. Hope Street; 609-625 W. 8th Street

**Final Date to Appeal:** October 11, 2023

#### APPELLANT

**For main entitlement cases, except for Building and Safety Appeals:**

**Check all that apply.**

- ☒ Person, other than the Applicant, Owner or Operator claiming to be aggrieved  
☐ Representative    ☐ Property Owner    ☐ Applicant    ☐ Operator of the Use/Site

**For Building and Safety Appeals only:**

**Check all that apply.**

- ☐ Person claiming to be aggrieved by the determination made by **Building and Safety**<sup>1</sup>  
☐ Representative    ☐ Property Owner    ☐ Applicant    ☐ Operator of the Use/Site

<sup>1</sup> Appellants of a Building and Safety Appeal are considered the Applicant and must provide the Noticing Requirements identified on page 4 of this form at the time of filing. Pursuant to LAMC Section 12.26 K, an appeal fee shall be required pursuant to LAMC Section 19.01 B.2.

## APPELLANT INFORMATION

**Appellant Name:** Richard Becher  
**Company/Organization:** Digital Realty  
**Mailing Address:** 365 Main Street  
**City:** San Francisco **State:** CA **Zip Code:** 94105  
**Telephone:** 415-652-4213 **E-mail:** rbecher@digitalrealty.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☐ Self ☒ Other: Digital Realty

Is the appeal being filed to support the original applicant's position?

☐ YES

☒ NO

## REPRESENTATIVE / AGENT INFORMATION

**Representative/Agent Name (if applicable):** \_\_\_\_\_  
**Company:** \_\_\_\_\_  
**Mailing Address:** \_\_\_\_\_  
**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_  
**Telephone:** \_\_\_\_\_ **E-mail:** \_\_\_\_\_

## JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part?

☒ Entire

☐ Part

Are specific Conditions of Approval being appealed?

☐ YES

☒ NO

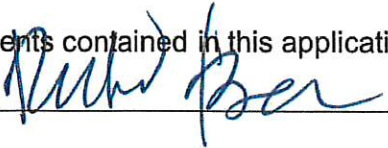
If Yes, list the Condition Number(s) here: \_\_\_\_\_

On a separate sheet provide the following:

- ☒ Reason(s) for the appeal
- ☒ Specific points at issue
- ☒ How you are aggrieved by the decision
- ☒ How the decision-maker erred or abused their decision

## APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

**Appellant Signature:**  **Date:** 10/8/2023



## GENERAL NOTES

*A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.*

*The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.*

### THIS SECTION FOR CITY PLANNING STAFF USE ONLY

**Base Fee:** \$166.00

**Reviewed & Accepted by (DSC Planner):** Claude Gooding

**Receipt No.:** 061023C1A-A0E8E0E9-ACD3-434E-A49E-71420BD5FCB6 **Date :** 10/06/2023

☐ Determination authority notified ☐ Original receipt and BTC receipt (if original applicant)

## GENERAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our [Online Application System \(OAS\)](#).

### APPEAL DOCUMENTS

#### 1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- ☐ Appeal Application
- ☐ Justification/Reason for Appeal
- ☐ Copy of Letter of Determination (LOD) for the decision being appealed

#### 2. Electronic Copy

- ☐ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

#### 3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a), or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- ☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b).

#### 4. Noticing Requirements (Applicant Appeals or Building and Safety Appeals Only)

- ☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. Appellants for BSAs are considered Original Applicants.
- ☐ *BTC Receipt.* Proof of payment by way of a BTC Receipt must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant to City Planning's mailing contractor (BTC).

See the Mailing Procedures Instructions ([CP-2074](#)) for applicable requirements.



## SPECIFIC CASE TYPES

### ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

#### DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITIES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 12.22 A.25(g).

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.
- ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

#### WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

#### [VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 17.54 A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

#### BUILDING AND SAFETY APPEAL

##### First Level Appeal

Procedures for an appeal of a determination by the Los Angeles Department of Building and Safety (LADBS) (i.e., Building and Safety Appeal, or BSA) are pursuant LAMC Section 12.26 K.1.

- The Appellant is considered the **Original Applicant** and must provide noticing and pay mailing fees.

##### 1. Appeal Fee

- ☐ Appeal fee shall be in accordance with LAMC Section 19.01 B.2 (i.e., the fee specified in Table 4-A, Section 98.0403.2 of the City of Los Angeles Building Code, plus surcharges).

##### 2. Noticing Requirement

- ☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per LAMC Section 12.26 K.3. Appellants for BSAs are considered Original Applicants.

- ☐ *BTC Receipt.* Proof of payment by way of a BTC Receipt must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant to City Planning's mailing contractor (BTC).

See the Mailing Procedures Instructions (CP-2074) for applicable requirements.

### **Second Level Appeal**

Procedures for a appeal of the Director's Decision on a BSA Appeal are pursuant to LAMC Section 12.26 K.6. The original Appellant or any other aggrieved person may file an appeal to the APC or CPC, as noted in the LOD.

#### **1. Appeal Fee**

- ☐ *Original Applicant.* Fees shall be in accordance with the LAMC Section 19.01 B.1(a).

#### **2. Noticing Requirement**

- ☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per LAMC Section 12.26 K.7. Appellants for BSAs are considered Original Original Applicants.
- ☐ *BTC Receipt.* Proof of payment by way of a BTC Receipt must be submitted to verify that mailing fees for the appeal hearing notice have been paid by the Applicant to City Planning's mailing contractor (BTC).

See the Mailing Procedures Instructions (CP-2074) for applicable requirements.

### **NUISANCE ABATEMENT / REVOCATIONS**

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 12.27.1 C.4. Nuisance Abatement/Revocations cases are only appealable to the City Council.

#### **1. Appeal Fee**

- ☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a).

For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b).





GIP 7th Street LLC  
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October 6, 2023

Jonathan A. Hershey, AICP  
Associate Zoning Administrator  
Deputy Advisory Agency  
Office of Zoning Administration  
200 N. Spring Street, Room 763  
Los Angeles, California 90012-4801  
Email: [jonathan.hershey@lacity.org](mailto:jonathan.hershey@lacity.org)

**Re:** Appeal – Case Nos.: CPC-2017-505-TDR-ZV-SPPA-DD-SPR; ENV-2017-506-EIR;  
VTT-74876-CN-1A  
*754 South Hope Street; 609 - 625 West 8th Street, Los Angeles, CA, 90017*

Mr. Hershey:

I write on behalf of Digital Realty Trust, Inc. ("**Digital**"), owner of the property located at 727 S. Grand Avenue, Los Angeles (the "**City**"), California 92651 (the "**Digital Parcel**"). The Digital Parcel's southern boundary abuts the site of a 50-story/592-foot ("**ft**") mixed-use development, comprised of 580 residential dwelling units and 7,499 square feet ("**sf**") of commercial floor area (the "**MFA Tower**" or the "**Project**"), proposed by MFA 8<sup>th</sup> Grand and Hope LLC ("**MFA**") for the property at 754 S. Hope Street and 609 and 625 W. 8th Street (the "**MFA Parcel**"). On behalf of Digital, I write to appeal (i) the two Zone Variances, two Specific Plan Project Permit Adjustments, and the Vesting Tentative Tract Map approved by the City Planning Commission ("**CPC**") and (ii) the Environmental Impact Report certified in connection with the Project.

## **I. INTRODUCTION.**

In its letter of decision for Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR (the "**Project LOD**"), issued September 26, 2023, the CPC, in compliance with the California Environmental Quality Act ("**CEQA**"), certified the Draft Environmental Impact Report ("**DEIR**") and Final Environmental Impact Report ("**FEIR**") for the Project and purported to adopt environmental findings, a statement of overriding considerations, and a Mitigation Monitoring Program prepared for the Project. However, these actions are invalid as the Initial Study, DEIR, and FEIR: fail to adequately analyze and disclose the full impacts of the Project; discuss legally inadequate alternatives; and propose infeasible mitigation measures that, in any event, do not mitigate the Project's impacts below the level of significance. Finally, the City, as lead agency, failed to comply with the procedural requirements regarding the circulation and public review of the DEIR. For these reasons, Digital requests that the FEIR be revised, recirculated for further public review and comment, and then re-presented as required by CEQA in conjunction with any Project approvals.

In the Project LOD, the CPC also approved: (i) a Zone Variance ("ZV") to allow relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction; (ii) a ZV to allow relief to allow reduced drive aisle widths of 24 feet in lieu of the required drive aisle width; (iii) a Specific Plan Project Permit Adjustment ("SPPA") for a Director's Determination for an Alternative Design to allow a deviation from the Ground Floor Treatment regulations in Section 4 of the Downtown Design Guide; (iv) a SPPA to allow for a deviation from Section 5 of the Downtown Design Guide to allow building elements and balconies to project up to 9 ft and 25 ft into the sidewalk easements along Hope Street and Grand Avenue respectively, and allow projects to begin at an elevation of 25 ft above grade along Hope Street and Grand Avenue; (v) a Director's Decision to allow 79 trees to be planted on-site in lieu of the otherwise required 145 trees, and to allow an in-lieu fee to be paid for the remaining 66 required on-site trees; and (vi) a Site Plan Review ("SPR") for a development project creating an increase of more than 50 dwelling units.

In its letter of decision for Case No. VTT-74876-CN-1A (the "VTTM LOD"), also issued September 26, 2023, the CPC, notwithstanding Digital's prior appeal, adopted: (i) Vesting Tentative Tract Map No. 74876-CN for the merger and re-subdivision of the MFA Parcel and (ii) a Haul Route for the export of approximately 89,750 cubic yards of soil from the Project site (collectively, the "VTTM").

In its approval of the Project and issuance of the Project LOD and the VTTM LOD, in addition to failing to comply with CEQA, the CPC failed to proceed in the manner required by law, failed to support the decision with adequate findings, and failed to support the findings with evidence. (See Code Civ. Proc., § 1094.5(b).) The Project LOD and VTTM LOD fail to offer adequate evidence in support of their findings. Set forth below please find a detailed analysis of this Appeal.

## **II. THE CITY HAS FAILED TO COMPLY WITH CEQA.**

### **A. Environmental Impacts Have Not Been Fully Analyzed and Disclosed.**

The FEIR makes errors, omissions, and unexplained and unjustified assumptions in its analysis of several environmental impacts studied. Namely, land use and cultural resources are inadequately or improperly studied, and the FEIR fails to adequately analyze transportation impacts associated with the Project. As a result, the FEIR fails to fully disclose the Project's likely impacts and must be revised and recirculated.

#### **1. *Impacts on Historical Resources Are Neither Disclosed nor Fully Analyzed.***

Projects that may cause a substantial adverse change in the significance of a historical resource are considered projects that may have a significant effect on the environment for CEQA purposes. (Pub. Res. Code, § 21084.1.) A historic resource is a resource listed in, or eligible for listing in, the California Register of Historic Resources (the "Register"). Resources listed in a local register or survey are also presumed to be historically significant unless the preponderance of the evidence demonstrates the resource is not historically or culturally significant. (Pub. Res. Code, § 21084.1; CEQA Guidelines, § 15064.5(a)(2).) Even if a resource has not been listed, or officially determined eligible for listing, in the Register or a local survey or register, the lead agency may still determine a resource is a historical resource for the purposes of CEQA. (Pub. Res. Code, § 21084.1.)



The FEIR neglects to include any discussion of the Project's impact on relevant historic and cultural resources. First, the IS concludes, without adequate analysis, that due to the Project's distance, approximately 250 ft, from the Boston Dry Goods Store, a designated City Historic Cultural Monument also known as the J.W. Robinson's Building, "the Project would not cause a substantial adverse change in the significance of a historical resource . . . and potential impacts to historical resources would be less than significant." (Initial Study [the "IS"], p. 46.) The analysis is threadbare, and no consideration is given to the impact of construction activities, noise, and vibrations.

Second, the IS, the DEIR, and the FEIR fail to include any analysis of the Project's impacts on two potentially historic structures located to the Digital Parcel's north. These structures—the Auto Center Garage located at 746 Hope Street and the Third Church of Christ, Christian Scientist Reading Room located at 730 Hope Street—were both identified by the City as potentially historic in the Historic Resources Survey Report for the Central City Community Plan Area, a copy of which is attached as Exhibit A. The Project site directly abuts the Auto Center Garage.

Notwithstanding the City's own Historic Resources Survey Report, the City, as lead agency, failed, as is required by CEQA, to evaluate in the IS, DEIR, or FEIR whether these structures are eligible for listing in the Register for purposes of CEQA. (IS, p. 46.) Because the IS, DEIR, and FEIR fail to acknowledge the potentially historic nature of these buildings, they do not study whether the Project will cause a substantial adverse change to either source by, for instance, towering over them both, creating significant construction and vibration and other construction-related disturbances that could significantly damage the structures, and demolishing a building that shares a wall with the Auto Center Garage or at minimum has a wall that is pressed up against the wall of the Auto Center Garage. This Project will be excavating to the depth of three subterranean parking levels (*i.e.*, approximately 63 ft), which could have an enormous impact on the stability of the Auto Center Garage since the wall of the garage is on the Property line. Any impact on the stability of the Auto Center Garage would amount to a substantial adverse change in the significance of a historical resource and thus would be a significant effect on the environment. (CEQA Guidelines, §15064.5(b); *Taxpayers for Accountable Sch. Bond Spending v San Diego Unified Sch. Dist.* (2013) 215 Cal.App.4th 1013, 1043.) Notwithstanding this potential for a significant impact, the IS, DEIR, and FEIR fail to even acknowledge the presence of these potentially historic structures in the vicinity of the Project.

## 2. *The Land Use Impacts of the Project's Significant Departure from Protective Design Standards Are Ignored.*

As the Project's DEIR recognizes, a threshold of significance for land use impacts is whether the project will "[c]ause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." (DEIR, p. IV.D-18.)

The IS, DEIR, and FEIR fail to acknowledge the tower spacing requirement set forth in the Downtown Design Guide and omit any discussion of the Project's lack of compliance with this standard in its analysis of land use impacts. The Downtown Design Guide requires that portions of a tower<sup>1</sup> taller than 150 ft shall be spaced 40 ft from an interior property line **when no adjacent tower exists, but one could be constructed in the future**. (See Downtown Design Guide, § 6.C.) The Downtown Design Guide clearly notes the potential environmental impacts of close tower spacing, including the minimization of views to the sky from the public realm and the

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<sup>1</sup> As defined, a "tower" refers to portions of a building over 150 ft in height. (See Downtown Design Guide, § 6.C.)

creation of wind tunnels. (See Downtown Design Guide, § 6.C.) As proposed, the MFA Tower fails to comply with these spacing requirements, resulting in a project that will be incompatible with and will conflict with the Downtown Design Guide's tower spacing requirements, a land-use regulation adopted for the purpose of avoiding or mitigating a significant environmental impact and for ensuring the orderly development and good urban planning for a dense, infill area. The Downtown Design Guide's requirement that projects take into consideration towers that do not currently exist but could be constructed in the future is consistent with CEQA Guidelines Section 15125(a)(1), which acknowledges that the baseline environmental setting can change or fluctuate over time and that consideration of expected conditions when the project becomes operational, if supported by substantial evidence can be the appropriate baseline "where necessary to provide the most accurate picture practically possible of the project's impacts."

Specifically here, the MFA Tower directly abuts Digital's property line to the north and due to the Project's noncompliance with the spacing requirement described above, the Project will conflict with the Downtown Design Guide's tower-spacing requirements and will result in the MFA Tower being prohibitively close to Digital's proposed 13-story data center on the Digital Parcel adjacent to MFA Parcel's northerly parcel line (the "**Data Center**"). Digital's project application has been pending since March 31, 2023, and Digital has been discussing its project with the Project developer since May 2022. Moreover, given the age of the existing parking structure on the Digital parcel, the rapid-changing nature of downtown Los Angeles, and the narrow lots at this location, it has long been likely that another tower would be constructed directly adjacent to the MFA Tower in the near future. Yet, the CPC fails to address the Project's noncompliance with this standard, avoiding its discussion entirely, and does not even acknowledge the proposed development of the Data Center.

Accordingly, the IS, the DEIR, and the FEIR improperly omit Digital's Data Center from consideration when discussing land use and planning impacts. This conflict with the tower spacing requirements must be disclosed and analyzed in the IS, the DEIR, or the FEIR.

3. *The FEIR Fails to Include Digital's Neighboring Data Center in the Project EIR's Cumulative Impact Analysis.*

An EIR must include a discussion and analysis of significant cumulative impacts. (CEQA Guidelines, §15130(a).) The cumulative impact analysis should be based on a list of projects (considering the project together with past, present, and probable projects that produce related impacts) or a summary of projections (basing the analysis on a planning document that projects regional or areawide conditions). (CEQA Guidelines, §15130(b)(1).) Here, the DEIR identifies a list of existing and anticipated projects. (DEIR, Table III-1.)

When preparing the list of projects, a lead agency has must select a reasonable cutoff date for the future projects to include in a cumulative impacts analysis and support that determination with substantial evidence. (*South of Mkt. Community Action Network v City & County of San Francisco* (2019) 33 Cal.App.5th 321, 336.) Here, the list of projects was prepared based on information provided by the Los Angeles Department of Transportation ("**LADOT**") and Los Angeles City Planning ("**Planning**"). The City fails, however, to clearly identify in the DEIR the cutoff date for the future projects to be included in the cumulative impact analysis. Thus, the City, as lead agency, failed to select a reasonable cutoff date (indeed no cutoff date is shown), abused its discretion, and failed to support a cutoff date with substantial evidence.

Notably, the list of probably future projects omits Digital's Data Center. An entitlement application was filed for the Data Center with Los Angeles City Planning on March 31, 2023 but



Digital had been discussing the project with MFA since May 2022. And while a Notice of Preparation (“NOP”) was filed for the Project on May 10, 2019, predating Digital’s submission of an entitlement application, the Data Center should have nevertheless been considered in an updated analysis of cumulative impacts due to the potential for new significant environmental impacts, including without limitation, land use and planning impacts related to tower spacing. Given the certainty of the proposed Data Center and the length of time that MFA has known about the Data Center while MFA’s application was pending, the City’s decision to omit it entirely from its CEQA analysis is an abuse of discretion. To comport with CEQA’s underlying intent to err on the side of protecting the environment, where a developer waits four years between the NOP and taking its entitlements to hearing in a dense, urban infill area, the surrounding area will be changed during the four year pendency of the entitlements and will be unrecognizable by the time the project is approved. Therefore the CEQA analysis needs to be updated to consider the changed surroundings. Otherwise, CEQA’s purpose as a tool to disclose to the public and the decision-making body the significant environmental effects of a proposed discretionary project is defeated.

4. *Impacts on Paleontological Resources Are Not Evaluated in the FEIR.*

The IS states that the Project will involve excavation to a depth of 63 ft and that paleontological resources may be present at this depth. Nevertheless, the IS concludes that such excavation shall result in a less than significant impact provided Mitigation Measure GEO-MM-1, which sets forth procedures that apply in the event of an inadvertent paleontological discovery, is complied with. When an impact may be potentially significant, even if mitigable, and an EIR is being prepared, that issue shall be evaluated in the EIR fully. Here, these issues surrounding the impact on paleontological resources are not analyzed in the FEIR, rendering the document inadequate.

5. *Transportation Impacts Related to the Project’s Noncompliance with Driveway Standards Are Ignored.*

As the Project’s DEIR recognizes, a threshold of significance for land use impacts is whether the project will “conflict with a program, plan, ordinance or policy addressing the circulation system.” (DEIR, p. IV.G-23.) Here, the DEIR improperly concludes that the Project is consistent with the driveway standards provided in Section 321, Driveway Design of LADOT’s Manual of Policies and Procedures (“MPP 321”) and thus fails to address a potentially significant and unmitigated impact.

Section V.B of MPP 321 provides that driveways on arterial highways, such as Hope Street and Grand Avenue, serving lots with more than 250 ft of street frontage cannot be placed within 150 ft of the adjacent street. Further, Section V.D of MPP 321 states, “[w]herever possible, two-way driveways should be separated by a minimum of 50 [ft] of full height curb to minimize conflict between vehicles using the adjoining driveway.” However, Figure 0.3 in the 8th, Grand and Hope Project Transportation Assessment prepared by the Mobility Group, dated May 2020, revised December 2020 (the “**Transportation Assessment**”), and included in Appendix G of the DEIR, shows that notwithstanding the Project’s more than 250 ft of frontage on 8th Street the Project’s Grand Avenue driveway would be only 102 ft from 8th Street and the Project’s Hope Street driveway would be 114 feet from 8th Street. Both driveways are in violation of the 150 ft separation required in MPP 321 for projects, like this one, with more than 250 ft of frontage on an arterial highway. Additionally, as shown in Figure 0.2 of the Transportation Assessment, the Project’s Grand Avenue driveway would be separated by approximately 15 ft of full height curb from the existing driveway serving the parking garage on the Digital Parcel, which is far less than the 50-ft separation required in MPP 321.

The response in the Transportation Assessment provided in Table 2.1 to Guiding Question No. 15 incorrectly asserts that the requirements provided in MPP 321 for the Project driveways and described in the preceding paragraph do not apply because the Project's frontages on Grand Avenue and Hope Street are less than 250 ft in length. This obscures the reality that the Project has substantial frontage along 8th Street (over 300 ft) and is thus subject to the requirement that driveways cannot be placed within 150 ft of the adjacent street. Furthermore, driveways compliant with the driveway location requirements of MPP 321 could be placed on 8th Street. Finally, noncompliance of the proposed Grand Avenue's driveway with the driveway standards is particularly problematic because inbound and outbound Project traffic at this location would conflict with transit buses using the newly dedicated Bus-Only Lane, as well as with vehicles on southbound Grand Avenue attempting to turn right onto westbound 8th Street.

The Transportation Assessment does not explain why vehicular access to the Project via 8th Street was not considered or is infeasible. Based on the lack of justification for the Project's vehicular access scheme and its non-compliance with the design standards set forth in MPP 321, a potentially significant and unmitigated impact may result. Nevertheless, the City has left this potential impact unstudied, rendering the document inadequate.

6. *The City Failed to Evaluate the Project's Inconsistency with the General Plan Housing Element's Affordable Housing Goals and Policies.*

The CPC failed to address the Project's inconsistencies with the affordable housing policies set forth by the City's 2021-2029 Housing Element ("**Housing Element**"), which was certified by the California Department of Housing and Community Development on May 27, 2022. (See Project LOD, p. F-15.) Notably, the MFA Parcel is listed as a site for future residential development, including the development of more than one affordable unit, in the Inventory of Sites ("**Housing Inventory**") prepared and adopted in connection with the City's Housing Element. The City's Housing Element includes, but is not limited to, the following objectives and policies related to the provision of affordable housing.

Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.

Objective 3.2: Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.

Policy 3.2.2: Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.

Here, the Project violates these and other policies set forth in the Housing Element due to its failure to include any affordable units.

Furthermore, the Second District Court of Appeal recently overturned the City's CEQA analysis for another project for failing to analyze the project's lack of affordable housing in light of the Housing Element's affordable housing policies. "Although an agency need not make an express consistency finding [citation omitted], there must be some indication that the agency actually considered applicable policies." (*United Neighborhoods for Los Angeles v. City of Los Angeles* (2023) 93 Cal.App.5th 1074, 1097.) Here, while the Project LOD purports to evaluate



the Project's consistency with the Housing Element, it does not address how the Project's lack of affordable housing comports with the Housing Element's affordable housing goals.

**B. Construction Related Vibration Impacts Associated with the Project Are Not Fully Mitigated.**

CEQA requires that any mitigation measures required to minimize a project's significant environmental impact be *feasible*. (Pub. Res. Code, §§ 21002.1(a), 21100(b)(3); CEQA Guidelines, § 15126.4 [emphasis added].)

Here, the DEIR identifies as a potentially significant impact vibration-induced damage to the existing parking structure located on the Digital Parcel to the north of the MFA project site. The DEIR concludes that compliance with relevant provisions of the Los Angeles Municipal Code ("LAMC") and Mitigation Measure NOI-MM-2 will result in the mitigation of this impact to a level of insignificance. (See DEIR, p. IV.E-46.) To mitigate this impact, NOI-MM-2 requires documentation of the physical condition of the offsite properties to establish a baseline against which to measure potential vibration-induced damage. Documentation of this baseline is to be completed from the MFA Parcel's property line and the public right of way. (See DEIR, p. IV.E-49 - IV.E-50.) However, documentation of interior structural elements of the parking garage, portions of the garage located below-grade and obscured from view, and portions of the garage located on the Digital Parcel's northern edge will be impossible and are thus not feasible. Concerns related to vibration-induced damage to these building elements that will be undocumented are particularly pronounced due to the age of Digital's building.

Thus, for NOI-MM-2 to be feasible, access to the Digital Parcel to document the existing condition will be required. Such access would require the consent of Digital. The DEIR fails to acknowledge the consent required and MFA has not obtained the required consent. If MFA does not obtain consent from Digital to inspect the parking structure there will be no baseline against which to assess potential impacts rendering NOI-MM-2 infeasible, ineffectual, and out of compliance with the requirements set forth under CEQA.

In addition, the DEIR's vibration analysis is woefully incomplete. It begins with the incorrect premise that "there are no historical resources located on or adjacent to the Project Site." (DEIR, p. IV.E-44.) As discussed above, there are two potentially historic structures that are completely ignored by the IS, DEIR, and the FEIR—the Auto Center Garage located at 746 Hope Street and the Third Church of Christ, Christian Scientist Reading Room located at 730 Hope Street. The City was required to analyze these structures as potentially historic, and thus should have evaluated the Project's potential construction and operation-related vibration impacts on these structures under the threshold for "buildings extremely susceptible to vibration damage." This is the methodology that the DEIR uses for the Boston Store-J.W. Robinson's Building, and thus would have been applied to the Auto Center Garage and Christian Scientist Reading Room had the potentially historic nature of these structures been acknowledged as required. Construction can have massive impacts on older buildings constructed under outdated standards, particularly in the case of this Project which will be excavating to the depth of three subterranean parking levels. Instead, the DEIR applies the much higher vibration significance criteria to the Auto Center Garage under an unfounded, unexplained assumption that it is a "reinforced-concrete, steel and timber building." As for the Christian Scientist Reading Room, the DEIR's vibration analysis ignores the existence of that building altogether and does not assess vibration impacts on that building at all, under any criteria. Accordingly, the DEIR's vibration analysis must be re-studied, re-analyzed, and then recirculated.

**C. An Inadequate Range of Alternatives is Considered Because No Alternative is Examined that Avoids Significant Below-Grade Excavation.**

CEQA requires an analysis of a reasonable range of alternatives to a proposed project, with a focus on those alternatives that would reduce or eliminate significant environmental impacts of the project. (See *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403; CEQA Guidelines, § 15126.6(a).) And although the number of alternatives required to be analyzed in an EIR is subject to a "rule of reason," the range of alternatives considered should correspond to the nature of the project and its environmental effects. (CEQA Guidelines, § 15126.6(f); *Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 565-66.)

Here, the DEIR fails to study a critical alternative, the construction of the Project with no below-grade construction. There is no effort to evaluate an alternative that reduces, or eliminates entirely, subterranean development. Although such an alternative may not completely avoid the Project's significant construction period noise and vibration impacts, eliminating subterranean development would greatly reduce the number of heavy truck trips (via the reduction in soil export), corresponding transportation impacts, and the severity of the significant construction period noise and vibration impacts. Failing to evaluate an alternative that reflects reduced transportation, noise, and vibration impacts means that decision-makers are acting blindly, without any awareness of an alternative that would avoid these impacts. Furthermore, given the proximity of potentially historic resources and unstudied yet potentially significant impacts the Project's construction and excavation will have on them, as set discussed in Section II.A and Section II.B above, the failure to evaluate an appropriate alternative that would reduce vibration and excavation risks is especially problematic and contrary to California law. Decision-makers should not approve the Project as proposed without evaluating whether there is a feasible alternative that involves less excavation and less construction, and thus fewer environmental impacts.

**D. The City, As Lead Agency, Failed to Comply with CEQA's Procedural Requirements.**

It is important to discuss the procedural issues associated with the environmental review of this Project. CEQA requires that the public review period for a DEIR shall be no less than 30 days and no longer than 60 days. (CEQA Guidelines, § 15105.) Indeed, CEQA further specifies that to make copies of EIRs available to the public, lead agencies should furnish copies of draft EIRs to public library systems serving the area involved. (CEQA Guidelines, §§ 15087(g), (a).)

Here, a commenter noted that they were unable to download the DEIR for review and that the City's Central Library did not have a copy available for review. In response to this comment, the FEIR notes that additional thumb drives containing the DEIR were distributed to libraries in the project vicinity. However, the FEIR preparers do not note when these thumb drives were available, nor whether they were available for the minimum 30-day period. Given this failure to make copies readily available to the public for review, the City should determine whether the DEIR was available for the legally required minimum time and, if not, should recirculate the FEIR.

**E. A Change in Circumstances Necessitates Preparation of a Subsequent or Supplemental EIR.**

CEQA provides that a subsequent or supplemental EIR may be required if “[s]ubstantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.” (Pub. Res. Code, § 21166(b).) Changed circumstances trigger the requirement that a subsequent or supplemental EIR be prepared if the changes will result in new or more severe significant environmental impacts requiring major revisions to the prior EIR or negative declaration for the project. (CEQA Guidelines, §15162(a)(2).) Here, because Digital has applied for the entitlement of the Data Center on the Digital Parcel additional CEQA analysis may be required because the FEIR failed to contemplate any future redevelopment of the surrounding parcels and the Data Center could result in additional significant environmental impacts.

Notwithstanding the potential for additional significant environmental impacts resulting from the Data Center, the City has thus far failed to substantiate its decision not to prepare additional environmental analysis. Instead, the CPC simply dismisses the potential necessity of preparing additional environmental analysis and fails to mention the potential impacts on the analysis of the proposed Data Center. (See VTTM LOD, F-54 – F-55.) Decision-makers should not have approved the Project as proposed without evaluating whether there are changes to the Project’s environmental impacts resulting from the future development of the Data Center.

Furthermore, the Data Center should be considered a future project for the purposes of the DEIR’s cumulative impacts analysis, as well as its Planning and Land Use analysis. (CEQA Guidelines, §15130(b)(1).) Even though preparation of the DEIR predates Digital’s submission of an entitlement application packet for the Data Center, there is no legal requirement that past, present, and probable projects that produce related impacts must be limited to those project’s proposed at the time of issuance of a NOP or preparation of a DEIR. Here, the City fails to identify a reasonable cutoff date and fails to support any selection of a cutoff date with substantial evidence. Given this failure to clearly establish a cutoff date and the potential impacts that may result from development of the Data Center alongside the MFA Tower, the City must consider the Data Center as a probably future project that could result in one or more cumulative impacts when evaluated alongside the MFA Tower.

**III. THE CPC FAILED TO PROCEED IN THE MANNER REQUIRED BY LAW, FAILED TO MAKE ALL NECESSARY FINDINGS, AND FAILED TO SUPPORT THE FINDINGS WITH ADEQUATE EVIDENCE.**

On July 13, 2023, the CPC approved (i) the VTTM, (ii) two ZVs authorizing relief from parking stall and drive aisle width standards (collectively, the “**Variances**”); (iii) two SPPAs authorizing changes to standards related to ground floor treatment, building / balcony projections into existing sidewalk easements, and the height above grade at which balconies can commerce (collectively, the “**SPPAs**”); (v) a Director’s Decision to allow 79 trees to be planted on-site in lieu of the otherwise required 145 trees; and (vi) Site Plan Review (collectively, the “**Project Approvals**”). In authorizing the Project Approvals, the CPC failed to proceed in the manner required by law, failed to support the decision with adequate findings, and failed to support the findings with evidence. Given the lack of evidence to support the CPC’s decisions and the failure to address all relevant laws and policies, we respectfully request reconsideration of the CPC’s action on the Project Approvals.

Outlined below, please find a detailed analysis of the legal deficiencies associated with the CPC's action.

**A. The Project Fails to Qualify for a Variance.**

Variances may be granted only when, because of special circumstances regarding a property, the strict application of the zoning ordinance deprives the property of privileges enjoyed by other property in the vicinity that is categorized under the identical zoning classification. (See LAMC, § 12.27(D).) Findings that highlight a desirable project design, amenities, benefits to the community, and the alleged superiority of the project design to those that could be developed without a variance are insufficient to establish the grounds necessary to grant a variance. Furthermore, the need to improve income or add value to a property does not constitute the hardship required to demonstrate the grounds necessary for approval of a variance.

Here, the CPC has failed to adequately establish the presence of special circumstances needed to authorize approval of a variance. Rather, in the findings supporting issuance of a variance the CPC provided conclusory analysis that simply restates the applicable legal standard and lists several characteristics of the MFA Parcel intended to distinguish it from surrounding, similarly situated sites. (See Project LOD, p. F-4 - F-6.) The CPC fails to provide adequate support for its conclusion that approval of the Variances is appropriate in the context of the Project. Thus, the City has failed to proceed in the manner of law, failed to support its decision with findings, and its findings are unsupported by substantial evidence. (*Topanga Ass'n for a Scenic Community v County of Los Angeles* (1974) 11 Cal. 3d 506, 514.)

**B. The Project Lack Consistency with the Central City Community Plan, the Downtown Design Guide, and the City's Housing Element.**

A VTTM must be designed in compliance with the zoning regulations applicable to the subject property. (LAMC, §§ 17.05(C), 17.06(B).) Similarly, SPR requires a finding that the proposed project is in substantial conformance with the purposes, intent and provisions of the City's General Plan, applicable community plan, and any applicable specific plan. (LAMC, § 16.05(F)(1).) SPR also requires a finding that the project "consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties." (LAMC, § 16.05(F)(2).) Here, as set forth in greater detail below, the CPC has failed to make the consistency findings required for approval of the VTTM and SPR.

**1. Central City Community Plan.**

The CPC failed to address the Project's inconsistencies with policies set forth by the Central City Community Plan (the "**Community Plan**"). The Community Plan, and its pending update, set forth countless policies and goals providing for an active and vibrant vision for Downtown Los Angeles characterized by a walkable urban environment with active streets and a mix of commercial and residential uses. For example, the Community Plan identifies the following objectives:

Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.



Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.

These and other goals, objectives, and policies recognize Downtown's status as the most prominent and diverse business and corporate center on the Pacific Rim and its role as a regional engine for growth. However, realization of this vision will be undermined if projects, like the MFA Tower, that feature construction of residential units abutting interior property lines and a lack of separation with existing or proposed buildings are allowed to restrict the development potential of surrounding sites. The Community Plan intends for Downtown Los Angeles to be fully built-out and revitalized, with parcels presenting a unified street frontage and developed with their highest and best use. Such a unified street frontage encourages the ground-floor activation and pedestrian activity in this area of the City necessary to realize the Community Plan's goals. And the full development of each parcel will result in the dense, urban, and walkable neighborhood described in City policy documents. MFA appears to ignore applicable policies, proposing a project that will constrain development of neighboring sites. Specifically, the proximity of the MFA Tower's norther façade to the property line of the Digital Parcel, in violation of the tower spacing requirements set forth in the Downtown Design Guide as described in greater detail throughout this letter, means that any future development on the site could need to be set back to avoid conflict with MFA and the future residents of the MFA Tower. The Downtown Design Guide proposed policies and standards intended to facilitate the development of all parcels in Downtown and avoid these conflicts. Here, the City, as lead agency, fails to identify how such a project can be compliant with the Community Plan, abused its discretion, and failed to support a determination of consistency with substantial evidence. *Downtown Design Guide*.

The Downtown Design Guide, which governs development of the MFA Tower, aims to prevent the development of towers in downtown that limit the redevelopment of neighboring sites through the establishment of development standards requiring tower separation. (See Downtown Design Guide, § 6.C.) Subject to certain exceptions, which are inapplicable here, a tower<sup>2</sup> taller than 150 ft, like the MFA Tower, shall be spaced 40 ft from an interior property line when no adjacent tower exists, but one could be constructed in the future. (See Downtown Design Guide, § 6.C.) This is consistent with the SPR requirement that projects "consist[] of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties."

The Project approved by the CPC is inconsistent with this key tower-spacing requirement set forth by the Downtown Design Guide. The MFA Tower directly abuts Digital's property line to the north and due to its noncompliance with the spacing requirement described above it will conflict with the Downtown Design Guide's tower-spacing requirements and thus potentially constrain development on Digital's parcel. Digital's project application has been pending since March 31, 2023, and Digital has been discussing its project with the Project developer since May 2022. Moreover, given the age of the existing parking structure on the Digital parcel, the rapidly changing nature of downtown Los Angeles, and the narrow lots at this location, it has long been likely that another tower would be constructed directly adjacent to the MFA Tower. Yet, the CPC fails to address the Project's noncompliance with this standard, avoiding its discussion entirely, and does not even acknowledge the proposed development of the Data Center. The CPC has not provided any justification or cited to any written rule or policy explaining its failure to consider the Data Center at all when assessing the MFA Tower's compliance with the Downtown Design

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<sup>2</sup> As defined, a "tower" refers to portions of a building over 150 ft in height. (See Downtown Design Guide, § 6.C.)

Guide and when assessing whether the Project consists of an appropriate building arrangement and compatibility with existing and future development on adjacent properties. Accordingly, the City, as lead agency, has abused its discretion and failed to support a determination of consistency with substantial evidence.

Even though the Project applicant will argue that the Data Center should be ignored because the Project developer filed their application first, the Project developer has waited four years since their NOP was issued before bringing their Project to hearing. In a dense, infill area changing as fast as downtown Los Angeles is changing, the circumstances surrounding a proposed project will inevitably change if a developer unreasonably delays completing their entitlements as the Project developer has done here. Developers who do not diligently pursue their entitlements to completion once their application is filed should not receive a windfall and be permitted to freeze their surrounding environment for an undetermined, unreasonable length of time to the detriment of good, sound planning for downtown Los Angeles. Accordingly, the CPC's approval of SPR and the VTTM should have considered the Data Center, and because it did not, the City's determination is unsupported by and amounts to an abuse of discretion.

## *2. Housing Element.*

The CPC failed to address the Project's inconsistencies with policies set forth by the Housing Element, particularly those related to the provision of affordable housing and the City's compliance with California Government Code Section 65863 ("**No Net Loss Law**"). (See Project LOD, p. F-15.) Notably, the MFA Parcel is listed as a site for future residential development, including the development of more than one affordable unit, in the Housing Inventory prepared and adopted in connection with the City's Housing Element. The City's Housing Element includes, but is not limited to, the following objectives and policies related to the provision of affordable housing.

Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.

Objective 3.2: Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.

Policy 3.2.2: Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.

Notwithstanding the strong policy preference for affordable housing and the Project site's inclusion on the Housing Inventory, the MFA Tower neglects to include any below-market rate units. Given this failure to include affordable units, the Project violates the policies set forth in the Housing Element. Despite this failure, the CPC omits any discussion of the Project's noncompliance with the City's housing policies and appears to dismiss the issue entirely.

Indeed, the City's failure to fully justify the Project's failure to include any affordable units runs counter to current City policy initiatives intended to spur construction of units for all community members, including Mayor Karen Bass's declaration of a local housing and homelessness emergency, which specifically found that the City "faces of critical shortage of local affordable housing." (See Declaration of Local Housing and Homelessness Emergency, July 7,

2023.) Finally, the Project's failure to include *any* affordable units renders it inconsistent with the City's identification of the MFA Parcel as a site for future residential development, including the development of more than one affordable unit, in the Housing Inventory prepared and adopted in connection with the City's Housing Element.

The CPC makes a conclusory determination without support that the Project's lack of any affordable units will not violate the state's No Net Loss Law because the City's Housing Inventory contains many potential affordable sites. (Project LOD, p. F-15.) However, without providing any analysis or facts substantiating this—for instance, how many other sites on the Housing Inventory are or are not including the number of affordable units designated in the Housing Inventory—the public cannot know if this Project contributes toward jeopardizing the sufficiency of the Housing Inventory. If every proposed project is granted a pass on including affordable units, then the Housing Inventory will quickly become inadequate to accommodate the City's Regional Housing Needs Assessment ("RHNA") allocation. Accordingly, the CPC failed to adequately quantify the Housing Inventory's ability to meet the unmet RHNA without the Project including affordable housing.

Given the lack of sufficient analysis and adequate findings on these issues, the CPC failed to support its finding of consistency with necessary evidence.

**C. The CPC Failed to Adequately Assess Future Passive or Natural Heating or Cooling Options.**

The design of a subdivision for which a tentative map is required "shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision." (Gov. Code, § 66473.1.) A tentative map of a subdivision must be disapproved if it fails to meet this design requirement. (See 64 Ops.Cal.Atty.Gen. 328.) Here, the City notes that lot layout has been considered along with the topography of the site to maximize passive or natural heating and cooling opportunities. However, applicant has not considered the proposed development of the Data Center on the adjacent site, which will necessarily impact passive or natural heating or cooling options as the building's proximity to the MFA Tower's, both of which will necessarily impact shade, prevailing breezes, and orientation. The City should request additional analysis on this issue to avoid noncompliance with the requirements of Government Code Section 66473.1.

**D. The Project is Incompatible with Future Development on Surrounding Parcels.**

When making the finding, required for SPR approval, that the Project is "compatible with existing and *future* development on adjacent properties and neighboring properties" the CPC must consider the Project's consistency with the future Data Center. (LAMC, § 16.05(F)(2) (emphasis added).)

At present, the Project's design fails to consider its potential impact on the surrounding parcels. Namely, the Project locates balconies and residential units immediately adjacent to the Digital Parcel's northern property line. Construction this close to property line results from an unreasonable assumption on the part of MFA that a valuable, underutilized infill site within Downtown's urban core would be left undeveloped forever and is incompatible with the future development on the Digital Parcel.

The CPC has failed to analyze the impact of the Project's failure to provide setbacks from neighboring parcels on the overall consistency of the Project with the surrounding development.

Under LAMC 16.05(F)(2) the CPC is required to analyze conformity with existing development but also with future development on adjacent parcels. Since May 2022, long before the issuance of the Project LOD, MFA has been fully aware of Digital Plan's for the neighboring parcel yet no analysis or consideration of these plans was included in the findings and justification related to the issuance of SPR approval. The CPC should request revisions to the MFA Tower to eliminate its inconsistency with the surrounding parcels or prepare written findings articulating the Project's consistency with future development on these parcels.

#### **IV. CONCLUSION.**

Given the analysis set forth above, we respectfully request that (i) the FEIR be revised, and recirculated, for additional review and comment, and that the City provide adequate evidence and findings to support its determinations regarding the Project Approvals and (ii) the review authority reconsider the Project's approval in light of the legal deficiencies related to the Project Approvals described above. Only after the Project's full impacts are disclosed, feasible mitigation measures identified, and adequate findings are made related to the Project's compliance with applicable policies and standards can the public and decision-makers be fully aware of the ramifications of the proposed MFA Tower and its impacts.

Very truly yours,



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# SurveyLA

Los Angeles Historic Resources Survey

## Historic Resources Survey Report Central City Community Plan Area



*Prepared for:*

City of Los Angeles  
Department of City Planning  
Office of Historic Resources



*Prepared by:*



Architectural  
Resources Group

Architectural Resources Group, Inc.  
Pasadena, CA

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# Project Overview

This Historic Resources Survey Report (Survey Report) has been completed on behalf of the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) for the SurveyLA historic resources survey of the Central City Community Plan Area (CPA). This project was undertaken from September 2015 to August 2016 by Architectural Resources Group (ARG).

This Survey Report provides a summary of the work completed, including a description of the Survey Area; an overview of the field methodology; a summary of relevant contexts, themes, and property types; and complete lists of all recorded resources. This Survey Report is intended to be used in conjunction with the **SurveyLA Field Results Master Report** (Master Report), which provides a detailed discussion of SurveyLA methodology and explains the terms used in this report and associated appendices. The Master Report, Survey Report, and appendices are available online at [www.surveyla.org](http://www.surveyla.org).

## SurveyLA Methodology Summary

Below is a brief summary of SurveyLA methodology. Refer to the Master Report discussed above for more information.

### **Field Survey Methods**

- Properties surveyed for SurveyLA are evaluated for eligibility for listing in the National Register of Historic Places, California Register of Historical Resources, and for local designation as Los Angeles Historic-Cultural Monuments (HCM) or Historic Preservation Overlay Zones (HPOZ), commonly known as historic districts.
- Field surveyors cover the entire area within the boundaries of a CPA. However, only resources that have been identified as significant within the contexts developed for SurveyLA are recorded.
- Consultants making resource evaluations meet the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History, History, or a related field.
- Surveys focus on identifying significant resources dating from about 1850 to 1980.
- All surveys are completed from the public right-of-way (from vehicles or on foot as needed).
- Digital photographs are taken of all evaluated resources.
- Field surveys do not include:

- Individual resources and historic districts (including HPOZs) that are already designated (listed in the National, California or local registers).
- Community Redevelopment Agency of Los Angeles (CRA/LA) surveys conducted concurrent with SurveyLA surveys.
- Potential HPOZ areas which have been surveyed within the last five years and are in the process of being designated.

### ***SurveyLA Resource Types***

SurveyLA identifies individual resources, non-parcel resources, historic districts and district contributors and non-contributors. Each of these is described below. Appendices A, B, and C of this Survey Report are organized by resource type.

- **Individual Resources** are generally resources located within a single assessor parcel, such as a residence or duplex. However, a parcel may include more than one individual resource, if each appears to be significant.
- **Non-Parcel Resources** are not associated with Assessor Parcel Numbers (APNs) and generally do not have addresses. Examples may include street trees, street lights, landscaped medians, bridges, and signs.
- **Historic Districts** are areas that are related geographically and by theme. Historic districts may include single or multiple parcels depending on the resource. Examples of resources that may be recorded as historic districts include residential neighborhoods, garden apartments, commercial areas, large estates, school and hospital campuses, and industrial complexes.
- **District Contributors and Non-Contributors** are buildings, structures, objects, sites and other features located within historic districts (such as residences, schools, and parks). Generally, non-contributing resources are those that are extensively altered, are built outside the period of significance, or do not relate to historic contexts and themes defined for the district.
- **Planning Districts** are areas that are related geographically and by theme, but do not meet eligibility standards for designation. This is generally because the majority of the contributing features have been altered, resulting in a cumulative impact on the overall integrity of the area and making it ineligible as a Historic District. The Planning District determination, therefore, is used as a tool to inform new Community Plans being developed by the Department of City Planning. These areas have consistent planning concepts, such as height, massing, setbacks, and street trees, which may be considered in the local planning process.



## Project Team

The Central City CPA survey team included the following personnel from ARG: Katie E. Horak, Principal, Architectural Historian and Preservation Planner; Andrew Goodrich, Associate, Architectural Historian and Preservation Planner; and Mickie Torres-Gil, Architectural Historian and Preservation Planner. Additional assistance was provided by intern Christina Park. Katie Horak served as project manager.

## Survey Area

### *Description of the Survey Area*

The boundaries of the Survey Area correspond with those of the Central City CPA, which is located in the eastern section of the city. The CPA encompasses all of Downtown Los Angeles and adjacent areas to the east that are zoned for industrial use. The Survey Area is relatively compact and is the second smallest Los Angeles CPA in terms of land area, though it is also the most densely developed. The area is trapezoidal in shape. Its boundaries are defined by Cesar E. Chavez Avenue on the north, Interstate 10/Santa Monica Freeway (10 Freeway) on the south, Alameda Street on the east, and State Route 110/Harbor Freeway (110 Freeway) on the west. The Survey Area abuts the CPAs of Central City North on the north and east, South Los Angeles and Southeast Los Angeles on the south, and Westlake on the west.

The Central City CPA is characterized by an extraordinarily diverse built environment and is somewhat informally divided into several smaller neighborhoods, each of which has a unique identity and physical character.<sup>1</sup> While the specific names and boundaries of neighborhoods are subject to interpretation and can vary widely across sources, the Central City Community Plan (2003) identifies nine neighborhoods within the CPA: Bunker Hill, Central City East, Civic Center, Convention Center, Fashion District, Financial District, Historic Core, Little Tokyo, and South Park. Two other neighborhoods, El Pueblo and the Warehouse District, are not explicitly listed in the Community Plan but have a unique identity and are also regarded as distinctive places within the CPA.<sup>2</sup> A brief description of each neighborhood is included below:

- **Bunker Hill** is located in the northwest section of the CPA. The community was originally one of the oldest neighborhoods in Los Angeles, but after World War II it was the site of a major redevelopment project undertaken by the Community Redevelopment Agency

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<sup>1</sup> Neighborhood definitions and boundaries are somewhat subjective, varying according to source; this report uses the most widely accepted definitions with an eye toward capturing the general development patterns of the Central City CPA, not parsing the exact divisions between neighborhoods as perceived today.

<sup>2</sup> Additional information regarding neighborhood boundaries was gleaned from “Your Downtown LA Vision Plan,” a vision plan for Downtown produced by the Downtown Los Angeles Neighborhood Council and the Southern California Association of Governments (SCAG).

of Los Angeles (CRA). Today it is a mixed-use neighborhood composed of office towers, hotels, multi-family residential complexes, and cultural attractions. Almost all of the buildings in Bunker Hill are high-rise structures that are sited on large parcels and open into public plazas. Several of the buildings in Bunker Hill are among the tallest in Los Angeles and help to define the city's skyline.

- **Central City East** is generally located to the east of the Historic Core and to the south of Little Tokyo. Spanning a diverse area that encompasses Skid Row, the Toy District, and adjacent industrial zones, the neighborhood contains a mix of industrial and institutional uses. Notably, it contains many Single-Room Occupancy (SRO) hotels, social service facilities, and warehousing sites that are associated with food processing. Development in this area is of a notably lower scale than in other parts of the CPA.
- The **Civic Center**, which flanks the north edge of the CPA, is the locus of government activity in Los Angeles. This neighborhood contains the second highest concentration of civic buildings in the nation and includes facilities associated with federal, state, and municipal branches of government. While a few of these buildings date to the 1920s and 1930s, most were erected after World War II. Many are oriented around an axial, landscaped promenade that is known today as Grand Park. At the west edge of the Civic Center is an iconic cluster of performance venues known as the Music Center.
- The **Convention Center** district comprises the southwest corner of the CPA and is the site of several of Los Angeles' foremost sports and entertainment venues. The neighborhood is anchored by the Los Angeles Convention Center, the Staples Center, and L.A. Live. It also includes several hotels, commercial buildings, parking facilities, and other uses that complement the area's entertainment-oriented identity.
- The **El Pueblo** district, which is located to the north of the Civic Center and the 101 Freeway, comprises what was the heart of Los Angeles in the Spanish Colonial and Mexican eras of California history. The district is oriented around a central plaza and is developed with commercial and institutional buildings, some of which date to the nineteenth century and are among the oldest extant buildings in the city. The district is home to Olvera Street, a tourist destination that celebrates Los Angeles' Mexican-era heritage. The pueblo was listed in the National Register in 1976 as the Los Angeles Plaza Historic District. The historic district was also known as El Pueblo de Los Ángeles State Historic Park, and recently was renamed El Pueblo de Los Ángeles Historical Monument.
- The **Fashion District** is located to the south and east of the Historic Core.<sup>3</sup> This area is largely composed of commercial and industrial properties that are used for the production and sale of garments and textiles, and is also an epicenter of the wholesale

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<sup>3</sup> The 2003 Central City Community Plan refers to this area as "South Markets," but since the document's publication the area has become known as the Fashion District. This community plan is currently being updated.



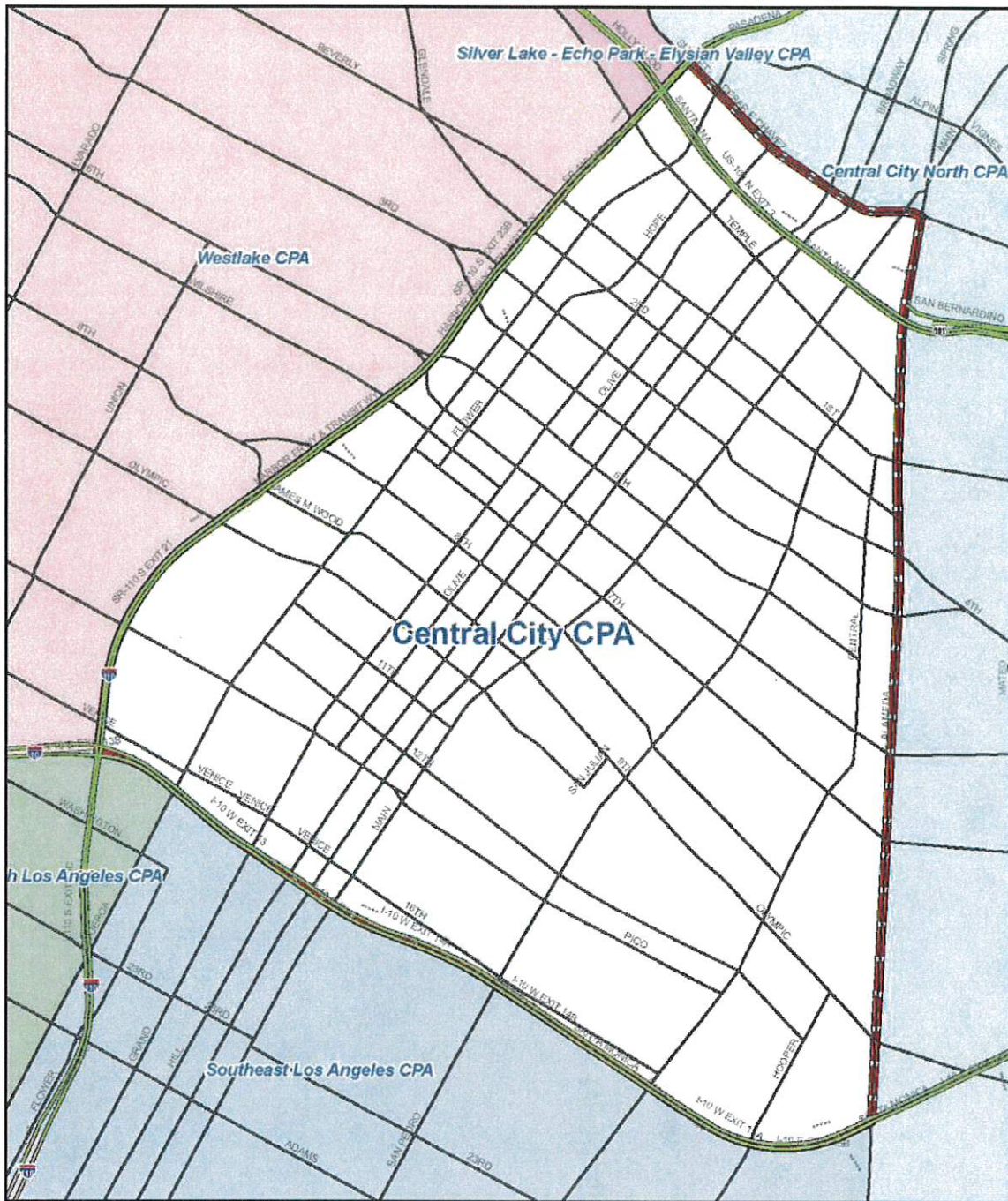
flower and produce trades. It contains an eclectic mix of low-scale commercial buildings and multi-story industrial lofts. This area was historically known as the Garment District, but was re-branded as the Fashion District in the 1970s as its focus shifted from garment production to garment sales.

- Abutting the west edge of the CPA is the **Financial District**, which is located to the south of Bunker Hill and to the west of the Historic Core. Its landscape is dominated by contemporary office towers that are occupied by banks, financial institutions, law firms, and corporate interests. Many of Los Angeles' tallest buildings are concentrated in the Financial District or nearby in Bunker Hill. While the Financial District consists largely of buildings that were constructed after World War II, the area also includes several earlier commercial buildings, especially near its eastern edge and along Seventh Street.
- The **Historic Core** is located near the center of the CPA and historically developed as the central business district of Los Angeles. This area includes a concentration of former banks, department stores, theaters, and other commercial uses that date largely to the 1910s and 1920s. Reflective of the era in which they were constructed, many of these buildings are designed in the ornate and embellished Beaux Arts style. The area languished after World War II as businesses relocated and buildings sat almost entirely unoccupied, but it has recently experienced a renaissance as many vacant buildings have been repurposed into residential lofts. The area also includes what is known as the Jewelry District, a hub of the wholesale jewelry trade, and is the site of two National Register historic districts: the Broadway Theater and Commercial District and the Spring Street Financial District, both of which were listed in the National Register in 1979.
- **Little Tokyo** is a mixed-use neighborhood that is located to the south and east of the Civic Center. Since the late nineteenth century, it has been the center of Japanese American cultural identity in Los Angeles and is home to many locally-significant businesses and institutions. While the area retains some vestiges of its late nineteenth and early twentieth century roots, many of its buildings date to the 1970s, when a redevelopment project was initiated in the area. Contemporary development consists of mixed-use commercial and residential projects. Within this neighborhood is the Little Tokyo Historic District, a National Historic Landmark (NHL) that spans the north side of First Street between San Pedro Street and Central Avenue. The Little Tokyo Historic District was listed in the National Register in 1986, and was declared an NHL in 1995.
- **South Park** is generally located at the southwest corner of the CPA, adjacent to the Convention Center district. It is a mixed-use neighborhood with a blend of commercial, residential, institutional, and industrial buildings, some of which date to the early twentieth century. Since the early 2000s, a considerable amount of infill development has occurred and consists largely of mid- and high-rise apartments, condominiums, and

hotels. Interspersed between these contemporary buildings is a handful of apartments, commercial blocks, and light industrial buildings from the early twentieth century.

- The **Warehouse District** occupies the southeast corner of the CPA and is located to the east of the Fashion District. It is primarily composed of warehouses and other utilitarian industrial uses. The area also includes a very small number of single-family dwellings and Single-Room Occupancy (SRO) hotels that are associated with early residential development patterns that once characterized the neighborhood. Like Central City East, which is located to the north, development in the Warehouse District is of a notably lower scale than in many other parts of Downtown.





## Central City Survey Area





The Survey Area contains 9,775 parcels, 8,033 of which were evaluated by the SurveyLA team. In accordance with SurveyLA methodology, properties constructed after 1980 and resources designated under local, state, and/or federal programs were not surveyed.

The Central City CPA is generally flat but is occasionally punctuated by modest hills and changes in elevation, particularly in and around the Bunker Hill neighborhood and to the north of the Hollywood Freeway/US-101 (101 Freeway). Both of these areas were historically characterized by varied topography but were almost entirely leveled in the mid-twentieth century to accommodate the westward expansion of Downtown's commercial and institutional core.

As one of the most urbanized areas of Los Angeles, the CPA has no natural features of note, though the channelized Los Angeles River is located directly to the east (outside of the CPA boundary). Rather, human-made features largely define the CPA. The area is encompassed by freeways and their associated overpasses, underpasses, and ramps. The freeways and their infrastructure include sections that are both above and below grade. Whereas the 10 and 110 Freeways are coterminous with the boundaries of the CPA, the 101 Freeway bisects it by way of a below-grade segment that is known as the "Downtown Slot" and physically separates the Civic Center from the historic El Pueblo district. Also within the CPA are two tunnels that carry vehicular traffic beneath Bunker Hill, one on Second Street and the other on Third Street, and a funicular railway (Angels Flight) that dates to 1901 and links Bunker Hill to the Historic Core. An elevated pedway network, which consists of above-grade pedestrian corridors, bridges, and stairwells, directly links several key buildings and sites in Bunker Hill. Two transit corridors that are used by the Metropolitan Transportation Authority (MTA, or Metro) and serve Downtown are located within the CPA: the Red/Purple Line subway right-of-way, which operates entirely below ground, and the Blue/Expo Line light rail right-of-way, which includes sections that run both above and below ground. A third subway corridor known as the Regional Connector is currently under construction. Entrance portals and other infrastructure associated with Metro's subway and light rail systems can be found at various points throughout the CPA.

Various land uses and associated property types are represented within the CPA. Very generally speaking, the western portion of the CPA is developed primarily with commercial properties that vary widely with regard to scale, height, age, and architectural style. Earlier examples of commercial properties, most of which are mid-rise structures and were constructed to the city's one-time height limit of 150 feet, are concentrated in the Historic Core and can also be found in some adjacent neighborhoods. Corporate office towers and other high-rise commercial buildings are located in the vicinity of Bunker Hill and the Financial District, and entertainment-related commercial uses are largely located in the Convention Center district. Lower-scale commercial development can be found in Little Tokyo and throughout the Fashion District. The eastern portion of the CPA, in contrast, is composed almost entirely of various industrial uses.

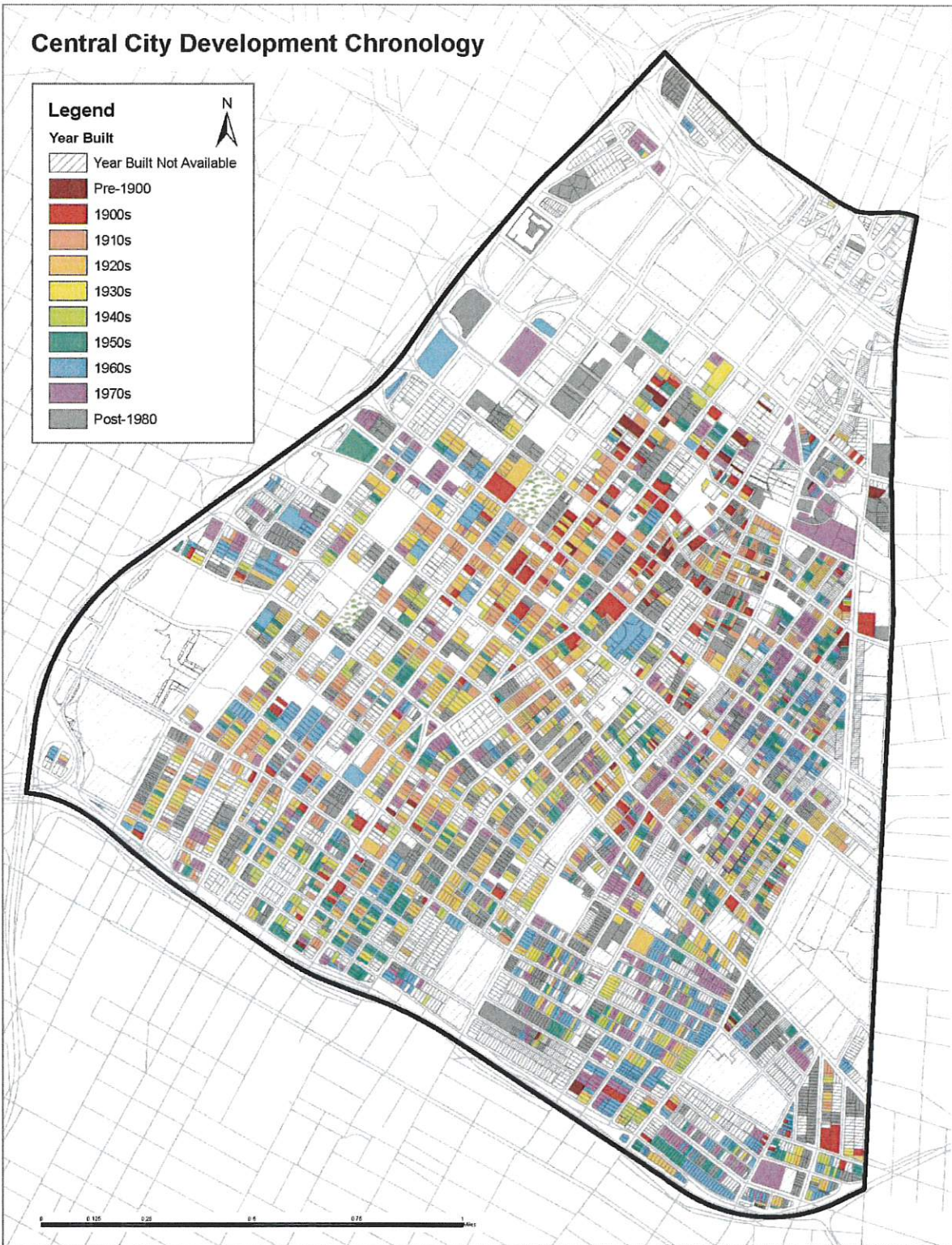
Though it is primarily a locus of commercial and institutional activity, the CPA includes some residential development as well. Following the adoption of the City's Adaptive Reuse Ordinance

in 1999, many of the early commercial buildings in the Historic Core have been repurposed into residences. Some of these converted properties are occupied exclusively by multi-family dwelling units, but others contain a mix of uses, with commercial tenants below and residential units above. Examples of multi-family residential development are also found in the South Park neighborhood and at the periphery of the CPA. Institutional uses are located at various points, though there is a concentration of civic buildings and institutional properties in and around the Civic Center. The CPA includes four public parks: Grand Park (12 acres), Pershing Square (five acres), Grand Hope Park (two and a half acres), and Spring Street Park (0.7 acres), as well as many public plazas and pedestrian promenades that facilitate circulation between key buildings and sites. Relative to other areas in Los Angeles that are more residential, Central City has a limited amount of open space.

Circulation within the CPA generally adheres to a grid pattern that is oriented at a 36-degree angle off the cardinal directions. The street grid divides the area into a series of blocks that are largely uniform in size and pedestrian in scale. Its skewed orientation, which is shared by most other neighborhoods adjacent to Downtown, can be traced back to the Laws of the Indies, which were used by the Spanish founders of Los Angeles to dictate the orientation and development of the pueblo and its environs. Many of the streets in the western half of the CPA are one-way and are arranged as couplets. Streets in the eastern, industrial section of the CPA continue to adhere to the grid, but feature longer blocks and adhere to a less regular pattern. Reflective of the area's varied topography, many of the streets in Bunker Hill feature multiple levels and separations of grade. Streets within the Toy District are defined by their meandering courses and narrow widths, which distinguishes them from the rest of Downtown's streets.

The major east-west arteries within the Survey Area are (from north to south): Cesar E. Chavez Avenue, Temple Street, First Street, Second Street, Third Street, Fourth Street, Fifth Street, Sixth Street, Seventh Street, Eighth Street, Ninth Street, Olympic Boulevard, Pico Boulevard, and Venice Boulevard. The major north-south arteries within the Survey Area are (from east to west): Alameda Street, Central Avenue, San Pedro Street, Maple Avenue, Los Angeles Street, Main Street, Spring Street, Broadway, Hill Street, Olive Street, Grand Avenue, Hope Street, Flower Street, and Figueroa Street.





*Chronology map of the Central City CPA (ARG, 2016)*



## ***Development History***

### **Early History and the Los Angeles Pueblo**

Like most of Southern California, what would eventually become Downtown Los Angeles was undeveloped and consisted of vast expanses of barren flatlands prior to the arrival of Spanish explorers and missionaries in the eighteenth century. The area was inhabited by the Tongva people in the pre-contact period. Of the hundred or so Tongva villages that are believed to have peppered the Southern California landscape at this time, the largest, which featured a population of approximately 100, was located on the western bank of the Los Angeles River and was known as Yang-na. The exact location of Yang-na has proven difficult for historians to pinpoint – and evidence suggests that the village likely moved several times due to shifts in the course of the Los Angeles River during wet seasons – but it is believed to have been located in the general vicinity of what is now the El Pueblo district and Los Angeles Union Station.<sup>4</sup>

In 1769, the area was “discovered” by Spanish explorers associated with the Portola Expedition, an overland excursion between San Diego and Monterey that led to the Spanish colonization of California. While journeying north, explorer Gaspar de Portolá, joined by two Franciscan monks and an entourage of soldiers and mules, arrived in what is now Elysian Park and set up an overnight camp. Father Juan Crespí, who recorded details about the expedition in his diary, marveled at the beauty of the Los Angeles River and noted that the area around Yang-na had “good land for planting all kinds of grain and seeds, and is the most suitable site of all that we have seen for a mission, for it has all the requisites for a large settlement.”<sup>5</sup> Father Crespí named the river in honor of Nuestra Señora La Reina de Los Ángeles de Porciúncula, a feast that had taken place the preceding day to celebrate the birth of Catholicism’s Franciscan order.<sup>6</sup>

However, Father Crespí’s recommendation pertaining to the riverfront site was disregarded. Instead, it was decided to erect a new mission some ten miles to the east, which was founded in 1771 and was named San Gabriel Arcángel.<sup>7</sup> Consistent with the Spanish system of mutually reinforcing land uses, sites also had to be selected for new secular settlements, or pueblos, that would support the missions and would also help to reaffirm Spain’s claim to Alta California. The site near Yang-na that Father Crespí had previously identified was selected by Governor Felipe de Neve as a potential location at which to develop a pueblo. This area encompassed four square leagues that included all of what is now Downtown Los Angeles and extended outward to present-day Indiana and Hoover streets, Exposition Boulevard, and an axis that followed the course of Fountain Avenue.<sup>8</sup>

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<sup>4</sup> “Site Context for the LA Plaza de Cultura y Artes Project, Los Angeles, California,” prepared for the County of Los Angeles by SWCA Environmental Consultants, Dec. 2012, 11.

<sup>5</sup> H. Eugene Bolton, *Fray Juan Crespí: Missionary Explorer on the Pacific Coast, 1769-1774* (Berkeley: University of California Press, 1927), 146-147.

<sup>6</sup> *California Place Names: A Geographical Dictionary* (Berkeley: University of California Press, 1949), 183.

<sup>7</sup> Maynard Geiger, “The Building of Mission San Gabriel: 1771-1828,” *Southern California Quarterly* 50.1 (March 1968): 33-42.

<sup>8</sup> City of Los Angeles, *Four Square Leagues: Los Angeles Two Hundred Years Later*, undated publication, 17.

Once De Neve's proposal was approved by the Spanish Crown in 1779, the governor enlisted a group of volunteers who were tasked with venturing north to California and formally settling the new town. Known as the pobladores, these volunteers were recruited from the Sinaloa and Sonora regions of New Spain.<sup>9</sup> Though they collectively relocated from northern Mexico and held Spanish surnames, the pobladores were an extraordinarily diverse group who belonged to eleven families of various ethnic backgrounds: among the 44 recruits who completed the journey, "only two were white...of the other 42, 26 had some degree of African ancestry and 16 were Indians or mestizos, people of mixed Spanish and Indian blood."<sup>10</sup> The pobladores and several soldiers who served as escorts set out for California in early 1781.

While awaiting the arrival of these founding families, plans were laid out for the development of the new pueblo. These plans adhered to the Laws of the Indies, a set of ordinances that shaped nearly every facet of life in Colonial Spain and included specific provisions related to the physical form of new towns. Reflective of these laws, the pueblo would be oriented around a rectangular plaza that would act as its geographical center. Extending outward in each direction from the plaza would be agricultural plots on which families would erect a house and farm the land.<sup>11</sup> A church and public buildings would flank the plaza. The laws called for pueblos to be oriented at 45 degrees from true north "to provide, it was said, equal light to every side of a small house throughout the day"; however, due to the shifting course of the Los Angeles River and the area's hilly topography, only a 36-degree angle could be attained.<sup>12</sup> This geographical challenge accounts for the skewed orientation of Downtown Los Angeles' street pattern today.

El Pueblo de Nuestra Señora La Reina de Los Ángeles de Porciúncula was officially founded on September 4, 1781, when the eleven families arrived at the site by way of the San Gabriel Mission. Shortly after arriving, three of the families were deemed as "not useful" and, at their own request, were relieved of their duties. Those that remained improved the land by erecting small, wattle-and-daub shelters; planting their respective plots with wheat, beans, and corn; and constructing an irrigation canal that transported water between the river and pueblo and was named the Zanja Madre, or "Mother Ditch."<sup>13</sup> The pobladores lived alongside the Tongva, who were moved to small rancherías on the edges of the pueblo and were often recruited for labor and menial jobs around the town.<sup>14</sup> Within a decade, the pueblo was composed of 29 adobe dwellings, a chapel, a guard house, several administration buildings, and granaries serving 139 people; by 1818, the population had grown to nearly 600.<sup>15</sup> The town was an agricultural success, producing large quantities of hemp and hundreds of acres of vineyards.

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<sup>9</sup> City of Los Angeles, "Los Pobladores," accessed May 2016.

<sup>10</sup> Myrna Oliver, "William Mason: California Historian, Author," *Los Angeles Times*, Nov. 25, 2000.

<sup>11</sup> Jean Bruce Poole and Tevvy Ball, *El Pueblo: The Historic Heart of Los Angeles* (Los Angeles: Getty Conservation Institute, 2002), 9; Corey and Sarah Stargel, *Early Downtown Los Angeles* (Charleston: Arcadia Publishing, 2009), 9.

<sup>12</sup> D.J. Waldie, "L.A.'s Crooked Heart," *Los Angeles Times*, Oct. 24, 2010.

<sup>13</sup> William M. Mason, *Los Angeles Under the Spanish Flag* (Burbank: Southern California Genealogical Society, Inc., 2004), 13.

<sup>14</sup> Poole and Ball (2002), 11.

<sup>15</sup> Poole and Ball (2002), 12.



The precise location of the original pueblo is the subject of debate, but what is known is that the town site was most likely located south of the current Los Angeles Plaza and occupied a lower-lying area that was prone to flooding. In 1815, torrential rains altered the course of the Los Angeles River and caused a flood so severe that it washed away almost the entire pueblo site.<sup>16</sup> Out of necessity, the townspeople moved the pueblo to higher ground, near where the Los Angeles Plaza is located today. Shortly after relocating the pueblo, a site was selected for a new plaza church (City HCM #3, in the Los Angeles Plaza Historic District), which was built beginning in 1818 and was dedicated in 1822. New public buildings and dwellings were erected nearby including the Avila Adobe (California Historical Landmark #145, in the Los Angeles Plaza Historic District), which was built in 1818 and is the oldest extant residence in Los Angeles.

Like the rest of California, the small pueblo transitioned to Mexican rule in 1821 after Mexico won independence from Spain. The transition from Spanish to Mexican rule was marked by many social and economic changes including secularization of the missions, the easing of trade restrictions, and the division of California into expansive land grants, or ranchos, which were used for cattle ranching and agriculture.<sup>17</sup> These changes bolstered California's lucrative hide-and-tallow trade and ushered in a wave of prosperity for the Los Angeles pueblo. Enveloped by cattle ranches and vineyards, the small settlement became an economic hub among Southern California's "cow counties" and slowly, but surely experienced an uptick in its population. Development was concentrated around the plaza, which by the 1830s consisted of institutions such as the plaza church; the dwellings of wealthy cattle ranchers; and a variety of businesses including retail stores, taverns, blacksmith shops, and tanneries. The area outside of the plaza retained an agricultural flavor and consisted almost entirely of ranches and farms. Underscoring its rise in stature under Mexican rule, the pueblo was officially conferred the status of "ciudad," or city, in 1835. By the mid-1840s, the population of Los Angeles had grown to 1,250.<sup>18</sup>

During the Spanish and Mexican eras of California history, Los Angeles "remained a frontier settlement with crooked, irregular streets, house lots of various shapes and sizes, and houses constructed at different angles to the streets and plaza."<sup>19</sup> Most of the buildings within the pueblo were modest, single-story adobe structures with flat, earthen roofs and dirt floors.<sup>20</sup> The character and architecture of Los Angeles remained relatively unchanged until the latter half of the nineteenth century, after California had become a part of the United States.

#### Development in the Early American Period

In 1846, war broke out between Mexico and the United States when the latter set out to expand its territory west to the Pacific Ocean. On a promontory to the west of the pueblo, a

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<sup>16</sup> Leon Furgatch, "L.A. River – a Force to Reckon With," *Los Angeles Times*, May 18, 1997.

<sup>17</sup> Carey McWilliams, *Southern California: An Island on the Land* (Salt Lake City: Peregrine Smith, 1946), 38-39.

<sup>18</sup> Hubert Howe Bancroft, et al., *History of California: 1841-1845* (San Francisco: The History Company, 1886), 628.

<sup>19</sup> "Technical Report: Historical/Architectural Resources," prepared for the Los Angeles Rail Rapid Transit Project Environmental Impact Report (Jan. 1983), 9.

<sup>20</sup> Ibid.

battalion of Mormon soldiers affiliated with the United States Army built Fort Moore, a military fortification that remained in operation between 1847 and 1853.<sup>21</sup> The war concluded with the signing of the 1848 Treaty of Guadalupe Hidalgo, in which many Mexican territories, including California, was ceded to the United States. A steady influx of white Americans began to settle in Los Angeles in the early years of statehood, especially miners who failed to strike it rich in the gold fields of Northern California, but overall it “remained a predominantly Mexican city for the next three decades in terms of population and the use of Spanish as a common language.”<sup>22</sup>

Many of the essential characteristics that would come to characterize Downtown Los Angeles – such as its street names, circulation patterns, and long rectilinear blocks – were set into place by the City’s first official survey, which was led by Lieutenant Edward O.C. Ord in 1849. The survey was commissioned so that the City could sell portions of its pueblo lands, which were not clearly delineated at the time due to inconsistencies between Mexican and American title law.<sup>23</sup> The sale of pueblo lands was also hindered because of a rule stipulating “that municipal lands could only be sold with reference to a city map.”<sup>24</sup> Starting at the plaza church, which was at the center of the city, Ord surveyed the hundred or so adobe buildings within the plaza and continued in each direction until the entire area around the plaza was covered. Ord’s findings were depicted in a map that set the stage for future development by delineating a network of streets and blocks to the southwest of the existing plaza. Much of Downtown Los Angeles would later be developed on Ord’s orthogonal grid. Likewise, several street names codified by the Ord survey – such as Principal (Main), Primavera (Spring), Loma (Hill), Flores (Flower), and Esperanza (Hope) – are still in use today, though they have been Anglicized.<sup>25</sup>

Los Angeles nonetheless remained a remote outpost and was regarded as “one of the most isolated communities in the nation” in the early years of statehood.<sup>26</sup> As more Americans ventured west and settled in Los Angeles, the city slowly began to shift to the south of its historical nucleus around the plaza. Most new development was clustered on Main and Los Angeles streets and consisted of small, modest buildings that were constructed alongside existing adobe structures.<sup>27</sup> One of the most notable examples of this early southward shift of the city was the Bella Union Hotel (not extant) at what is now the northeast corner of Main and Temple streets. Notable as the city’s first full-fledged hostelry, the Bella Union opened in 1849 in an existing building that had previously been a general store. In addition to very modest accommodations and an on-site saloon, which was known for its hardscrabble clientele and the

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<sup>21</sup> The California Military Museum, “The Two Forts of Fort Hill,” accessed May 2016.

<sup>22</sup> City of Los Angeles, “El Pueblo de Los Angeles Historical Monument,” accessed May 2016.

<sup>23</sup> W.W. Robinson, et al., “Story of Ord’s Survey: As Disclosed by the Los Angeles Archives,” *The Quarterly: Historical Society of Southern California* 19.3 (Sept.-Dec. 1937): 121-131.

<sup>24</sup> William David Estrada, *The Los Angeles Plaza: Sacred and Contested Space* (Austin: University of Texas Press, 2008), 54.

<sup>25</sup> Glen Creason, “CityDig: Los Angeles Was Once a Small Adobe Backwater,” *Los Angeles Magazine*, Jul. 20, 2015.

<sup>26</sup> John Mack Faragher, *Eternity Street: Violence and Justice in Frontier Los Angeles* (New York: W.W. Norton and Company, 2016).

<sup>27</sup> Water and Power Associates, “Early Los Angeles Historical Buildings (1800s),” accessed May 2016.



occasional gun battle, the hotel served as an important center of social and political life in early Los Angeles. In the 1850s, several notable local institutions occupied the building including Los Angeles County's first courthouse; the headquarters of the city's first newspaper, the *Los Angeles Star*; and the offices of the Butterfield Overland Mail Company.<sup>28</sup>

Several small business blocks were subsequently constructed near the Bella Union. A cohort of enterprising developers erected new business blocks in the vicinity including the Temple Block at Main and Temple streets (1857, not extant); the Downey Block, also at Main and Temple streets (1869, not extant); and the Baker Block at Main and Arcadia streets (1878, not extant). Closer to the plaza, the three-story Pico House (California Historical Landmark #159, in the Los Angeles Plaza Historic District) was erected by ex-Mexican Governor of California Pio Pico between 1869 and 1870 and was billed as the city's finest hotel, superseding the Bella Union.<sup>29</sup> Modest houses that reflected the humble means of their inhabitants occupied the blocks in the immediate vicinity of the plaza and the Main Street commercial corridor. Areas lying to the east of the city continued to be dominated by agriculture and ranching operations. In contrast to the adobe structures that had characterized the built environment of Los Angeles in the Spanish and Mexican periods, new construction in the early years of statehood consisted of wood and brick structures, as those who arrived in Los Angeles from the Eastern United States brought their preferred architectural styles and method of construction with them.<sup>30</sup>

In his survey, Lieutenant Ord had optimistically extended the city grid as far south as 12<sup>th</sup> Street and as far west as Figueroa Street. In reality, much of this area was very slow to develop, and blocks at the farther reaches of Ord's grid generally remained untouched and "still looked and functioned like open pasture" well into the 1860s and 1870s.<sup>31</sup> However, development began to eke its way to the south and west of what was then the city's population center. One of the first developments to take place on the urban fringe was initiated in 1866, when City officials set aside an undesirable block bounded by Fifth, Sixth, Hill, and Olive streets as a public park and named it La Plaza Abaja, or "the Lower Plaza." The park remained a swath of barren land until a group of affluent landowners planted it with cypress and citrus trees in the 1870s.<sup>32</sup> After a succession of name changes and redesigns, the park was eventually named for World War I General John Pershing and is now known as Pershing Square. A second notable development project in the area occurred in 1867 when a campus was developed for St. Vincent's College (not extant). Consisting of a stately two-story building surrounded by athletic fields, the campus encompassed the block bounded by Sixth, Seventh, Broadway, and Hill

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<sup>28</sup> Maymie R. Krythe, "First Hotel of Old Los Angeles: 'The Romantic Bella Union,'" *The Historical Society of Southern California Quarterly* 33.2 (June 1951): 147-179.

<sup>29</sup> Water and Power Associates, "Early Los Angeles Historical Buildings (1800s)," accessed May 2016.

<sup>30</sup> "Technical Report: Historical/Architectural Resources," prepared for the Los Angeles Rail Rapid Transit Project Environmental Impact Report (Jan. 1983), 9.

<sup>31</sup> Nathan Masters, "From Plaza Abaja to Pershing Square," *KCET*, May 9, 2012.

<sup>32</sup> Los Angeles Conservancy, "Pershing Square," accessed May 2016.



streets and exerted a commanding physical presence at what was then the southern periphery of the city.<sup>33</sup>

#### Late Nineteenth Century Development

By 1870, Los Angeles' population had increased to 5,728, its largest number to date, yet the city exuded a small-town feel and paled in comparison to other cities such as San Francisco, whose population at this time was approaching 150,000. However, in the final quarter of the nineteenth century Los Angeles experienced a period of unprecedented growth, and for the first time began to take on a more urban character. This growth was catalyzed, in large part, by the construction of new railroad lines to Los Angeles, which forged a direct connection between Southern California and other regions and effectively put the city on the nation's radar for the first time. Los Angeles' first railroad was built between 1868 and 1869 and connected the Central City area with port facilities at San Pedro, some twenty miles to the south. Financed by entrepreneurs John Downey and Phineas Banning, the Los Angeles and San Pedro Railroad "reduced the cost of transporting goods and passengers to and from the ships" at the port.<sup>34</sup> A second major development came in 1876, when the Southern Pacific Railroad completed a railroad line from San Francisco to Los Angeles, providing Southern California with its first transcontinental rail connection. Several years later, in 1885, a second transcontinental line developed by the Atchison, Topeka and Santa Fe Company terminated in Los Angeles and provided an even more direct connection with major East Coast cities and economic markets.<sup>35</sup>

The railroads' arrival ushered in a wave of rapid growth as investors, eager to capitalize on the area's economic potential, poured their resources into local real estate. The area that formed the nucleus of early Los Angeles experienced an onslaught of new development in the late nineteenth century and emerged as an eminent political, cultural, and economic center. Generally speaking, the city experienced a southward shift at this time as a significant amount of new development occurred to the south of the plaza. "A dense core of commercial and government buildings" agglomerated in the area now known as the Civic Center, with scores of new commercial blocks erected along Main Street between the plaza and roughly Second Street. An oddly-configured intersection where Main, Spring, and Temple streets converged, known as Temple Square, emerged as the commercial heart of the city, where "professionals of all stripes – lawyers, bankers, photographers, hatters – jockeyed for offices."<sup>36</sup> Hotels were swiftly constructed nearby to accommodate newcomers who arrived in Los Angeles by train. Institutional buildings also clustered around Temple Square. At Main and Second streets, a massive new cathedral (City HCM # 17) was built, which was named for martyr Saint Vibiana and was a dominant element of the city when it opened in 1876. Civic buildings were erected nearby including a new City Hall on Broadway between Second and Third streets (1888, not extant), and what was known as the "Red Sandstone Courthouse" (1891, not extant).<sup>37</sup>

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<sup>33</sup> Stargel and Stargel (2009), 28.

<sup>34</sup> Nathan Masters, "L.A.'s First Railroad Connected the Region to the Global Economy," *KCET*, Mar. 14, 2012.

<sup>35</sup> McWilliams (1946), 117-118.

<sup>36</sup> Curtis C. Roseman, et al., *The Historic Core of Los Angeles* (Charleston: Arcadia Publishing, 2004), 7.

<sup>37</sup> Both of these buildings were subsequently demolished to accommodate the expansion of the Civic Center.

A considerable amount of residential development also occurred amid the railroad boom. By directly competing with the Southern Pacific, the Santa Fe transcontinental line touched off a “fare war” between the two companies that reduced travel costs to nearly nothing and brought droves of newcomers to Los Angeles. Many of these visitors elected to stay in Los Angeles after being introduced to its salubrious climate, which led to a substantial increase in the city’s population. To keep pace with this growth, areas around the Downtown commercial district were developed with new residences. Reflective of the diverse composition of the city’s population at the time, residential development consisted of a variety of housing types; single-family residences, apartment houses, and residential flats tended to occupy blocks farther removed from the commercial core, whereas denser rooming houses and residential hotels were more deliberately integrated into the urban fabric. Several Single-Room Occupancy (SRO) hotels arose along the corridors between Main Street and the rail depots around Alameda Street. These modest hostelries provided low-cost accommodations to seasonal workers and train crews who were “laid over” between trips, most of whom were single men.<sup>38</sup>

On the opposite end of town from the ill-reputed residential hotels was an upscale residential district known as Bunker Hill. Occupying a promontory to the west of the business district, the area had historically been seen as poorly-suited to development because of its topography and its general inaccessibility to the city. However, in 1867 developer Prudent Beaudry purchased the entire promontory and vowed to transform the scrubby, inaccessible area into a profitable real estate venture.<sup>39</sup> Over the next several years, Beaudry invested heavily in making the hill a feasible place to settle, which included the construction of a new system of water pipes and steam pumps and the platting of roads up and across the hill. By the 1880s, Bunker Hill had evolved into Los Angeles’ toniest residential district. Many of the city’s most affluent and esteemed households constructed large, Victorian-era mansions that were perched atop the hill and overlooked the city below. In part, Bunker Hill’s success was aided by advances in public transportation including a cable car line on Second Street that opened in 1885, and two funicular railways – Angels Flight (City HCM #4) and Court Flight (not extant) – that rendered it easier for passengers to travel up and down the steep eastern grade.

Characteristic of the era, many of the residential communities that developed in Central City in the late nineteenth century were restricted to middle- and upper-class whites. Ethnic and cultural minorities were typically relegated to small enclaves that tended to be located around the historic plaza and in other areas that were deemed less desirable. One of the earliest ethnic enclaves to develop in the area, a block-long stretch of Calle de los Negros (a small alley adjacent to the plaza), was occupied by Chinese American laborers. Known as Old Chinatown, it “was the center of community for Chinese in Los Angeles and included both living quarters and places of employment.”<sup>40</sup> By 1870, the area included approximately 200 Chinese American

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<sup>38</sup> Los Angeles Area Chamber of Commerce, “History of Downtown Los Angeles’ ‘Skid Row,’” n.d.

<sup>39</sup> Nathan Masters, “Rediscovering Downtown L.A.’s Lost Neighborhood of Bunker Hill,” *KCET*, Jul. 11, 2012.

<sup>40</sup> “SurveyLA Draft Chinese American Historic Context Statement,” Sept. 2013, 5.



residents, most of whom were employed as launderers, truck farmers, and vegetable peddlers. Other ethnic enclaves also arose in the vicinity including an Italian settlement around what is now Olvera Street, and a Mexican American community called Sonoratown to the north and west of the historic plaza.<sup>41</sup> A multi-ethnic Mexican and Italian community that was known as the Mateo/Cabrini district emerged in what is now the industrial district of Downtown, but was later decimated by the construction of the Santa Monica Freeway/Interstate 10.<sup>42</sup>

To the east of the commercial core at Main and Temple streets, the seeds of a Japanese American enclave were sowed when a former Japanese sailor named Charles Kame opened a small café on East First Street in 1886.<sup>43</sup> Kame's café formed the cornerstone of a small Issei (first generation Japanese) community that developed near First and San Pedro streets. By the late 1890s, other Japanese-owned restaurants set up shop in the East First Street neighborhood and "served American meals to an ethnically mixed working class who worked in the district."<sup>44</sup> The area subsequently evolved into the heart of the Japanese American community in Los Angeles as many Nikkei (Japanese immigrants) moved into the neighborhood, attracted to its relative lack of discrimination and proximity to places of employment. The area was first referred to as "Little Tokyo" circa 1905 and emerged as a thriving cultural enclave. By the 1920s, the area had become home to a sizable Japanese American population and was also the site of myriad stores and institutions that catered to its largely-immigrant community.

#### Early Twentieth Century Growth: Rise of the Central Business District

By the turn of the twentieth century, Los Angeles had unequivocally shed its small town roots and had matured into "a populous, commercialized city with increasing regional importance."<sup>45</sup> Its population had nearly doubled between 1890 and 1900, from roughly 50,000 to more than 102,000.<sup>46</sup> As the city grew in population and stature, its business district was pulled to the south and west, eventually supplanting older commercial nodes and giving rise to a thriving central business district that is known today as the Historic Core. By 1900, several prominent commercial buildings had been constructed in the area including the Bradbury Building at Second Street and Broadway (1893, City HCM #6) and the Douglas Building at Third and Spring streets (1898, City HCM #966). As more and more development occurred, and the central business district began to firmly take shape, the term "Downtown" was used to describe the area and became a part of the local lexicon. The first official reference to "Downtown Los Angeles" appeared in the *Los Angeles Herald* in 1906, and in the *Los Angeles Times* in 1909.<sup>47</sup>

Construction of the Continental Building at Spring and Fourth streets (City HCM #730) in 1904 was a particularly evocative symbol of the southward expansion of Downtown. While it was not

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<sup>41</sup> Charles Epting, *Victorian Los Angeles: From Pio Pico to Angels Flight* (Charleston: Arcadia Publishing, 2015), 32.

<sup>42</sup> "SurveyLA Latino Historic Context Statement," Sept. 2015, 20.

<sup>43</sup> National Park Service, "Little Tokyo Historic District," accessed May 2016.

<sup>44</sup> "National Register of Historic Places Nomination Form: Little Tokyo Historic District," prepared 1976-1977.

<sup>45</sup> Historic American Building Survey Documentation for the Garnier Block, HABS No. CA-2799, n.d.

<sup>46</sup> "Historical Resident Population, City and County of Los Angeles," Los Angeles Almanac, accessed May 2016.

<sup>47</sup> Nathan Masters, "How Los Angeles Got a 'Downtown,'" *KCET*, Jan. 9, 2015.

the first modern structure to arise in the area, the 13-story, Beaux Arts style building was the tallest in Los Angeles upon its completion and is generally considered to be the city's first high-rise structure.<sup>48</sup> However, as buildings were becoming increasingly taller, City officials and other Downtown stakeholders expressed concern that Los Angeles would become "Manhattanized," which threatened its image as a retreat from the dense, congested, and walled-in streets of East Coast cities. Concerned parties made the case that "high buildings make for congestion, and the experience of New York and Chicago and other large cities has demonstrated the wisdom of avoiding everything that will tend to create congestion."<sup>49</sup> They instead advocated for a more horizontal pattern of development since, at the time, Los Angeles had what seemed to be unlimited space in which to expand. In response, the Los Angeles City Council enacted an ordinance in 1905 that restricted the height of new buildings to 150 feet, or roughly 13 stories.<sup>50</sup> The height ordinance thwarted the vertical growth of Downtown and created a nearly-uniform skyline that lasted until the restrictions were repealed in the mid-1950s.

As the central business district was pulled to the south, new commercial and institutional buildings were swiftly constructed until nearly every parcel in the Historic Core was developed. Between the turn of the twentieth century and the late 1920s, the central business district took shape and matured into a quintessential American downtown. Scores of new height-limit buildings were erected to house the entire gamut of commercial uses including banks and financial institutions, hotels, offices, department stores and smaller retail outlets, theaters and concert halls, and restaurants and taverns.<sup>51</sup> Many of these buildings featured some combination of commercial uses, typically with retail on the ground story and offices up above. Reflecting the prevailing sense of prosperity, almost all were intended to be bold architectural statements that showcased an architect's mastery of the Beaux Arts tradition or other, similar architectural styles that exuded formality and were predicated on the Classical orders. Buildings constructed at the end of the 1920s and into the early 1930s often exhibited characteristics of styles that were considered to be more "modern," including Art Deco and Streamline Moderne.

Some of Downtown's major thoroughfares took on discernible identities during this period of unprecedented growth. A critical mass of banks and financial institutions arose along Spring Street, which spurred comparisons with its East Coast counterpart, Wall Street, and led to it becoming known as the "Wall Street of the West." By the 1920s, Spring Street included a "remarkably homogenous collection of financial structures" that collectively acted as the heart of economic activity in the city.<sup>52</sup> Anchored by the construction of the Bullock's Department Store at Seventh and Broadway in 1906, Seventh Street matured into an upscale shopping district in the 1910s and 1920s, and was lined with stores operated by leading retailers.<sup>53</sup>

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<sup>48</sup> "Renovation Action Taken by CRA on Two Buildings," *Los Angeles Times*, Mar. 9, 1986.

<sup>49</sup> "The Height of Buildings," *Southwest Contractor and Manufacturer* 6.1 (Nov. 1, 1910): 17.

<sup>50</sup> Ray Hebert, "No Tall Buildings: Aesthetics, Not Quakes, Kept Lid On," *Los Angeles Times*, Jul. 8, 1985.

<sup>51</sup> Roseman, et al. (2004), 7.

<sup>52</sup> National Register of Historic Places Nomination Form, "Spring Street Financial District," prepared Jul. 1977.

<sup>53</sup> Los Angeles Conservancy, "Strolling on 7<sup>th</sup> Street: Downtown's Historic Thoroughfare," Nov. 7, 2010.



Broadway emerged as a robust commercial and entertainment district and was anchored by several major department stores, variety stores, and theaters, twelve of which are still standing. More than a dozen grand movie palaces arose along the Broadway corridor between the 1910s and 1930s, each of which vied to be more opulent than its predecessors. The embellished architecture of these theaters culminated in Broadway's particularly "diverse and colorful streetscape."<sup>54</sup> One of the last theaters to be built on Broadway, the Los Angeles Theatre (City HCM #225, in the Broadway Theater and Commercial District), opened in 1931 at a cost of one million dollars and was considered to be the most lavish of Broadway's movie palaces. In addition to its extravagant French Baroque design, the venue also featured unusual amenities including an electric monitor to indicate available seats, soundproof "crying rooms" for parents with young children, a staffed playroom, and "a glamorous ladies lounge featuring sixteen private compartments, each finished in a different marble."<sup>55</sup>

Amid Los Angeles' rapid growth, local leaders deemed it a priority to modernize and expand municipal services and initiated plans to develop a new civic center complex at the north end of the central business district. At the time, civic functions were scattered across the Downtown area and lacked the cohesion and monumentality that its leaders believed were befitting of a city the size of Los Angeles. After competing visions led to multiple failed attempts and years of political wrangling, the City Council adopted a Civic Center Master Plan in 1927 that incorporated elements of previous plans that had been developed for the area by city planner Charles Mulford Robinson, the architectural firm of Cook and Hall, and a consortium of local practitioners known as the Allied Architects Association.<sup>56</sup> Bounded by First, Ord, Main, and Hill streets, the proposed civic center adhered to a north-south axis and would forge a link between civic buildings and the plaza. While most of the monumental buildings spelled out in the plan did not come to fruition, two – the Hall of Justice (1925, listed in the California Register) and Los Angeles City Hall (1928, City HCM #150) – were built and helped to anchor the new complex. A courthouse and post office building, designed by architect Gilbert Stanley Underwood, was added to the complex between 1937 and 1940 (listed in the National Register).<sup>57</sup>

While new commercial and institutional development gave rise to the central business district, industrial development was swiftly transforming the blocks east of Main Street. This area had historically been occupied by a mix of agricultural land and working-class neighborhoods, but the presence of railroad depots, warehouses, and yards along Alameda Street had paved the way for industrial development nearby in the early twentieth century. Some of the area's earliest industrial properties arose adjacent to the railroad depots and consisted of buildings that supported agriculture and food processing, both early linchpins of the Southern California

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<sup>54</sup> National Park Service, "Broadway Theater and Commercial District, Los Angeles, California," accessed May 2016.

<sup>55</sup> Los Angeles Conservancy, "Los Angeles Theatre," accessed May 2016.

<sup>56</sup> Kevin Starr, *Material Dreams: Southern California through the 1920s* (New York: Oxford University Press, 1990), 112-115.

<sup>57</sup> U.S. General Services Administration, "U.S. Courthouse, Los Angeles, CA," accessed May 2016.



economy. In the vicinity of Alameda Street were several cold storage warehouses, produce brokerages, fish markets, and other agricultural-related uses that took advantage of the area's proximity to freight rail.<sup>58</sup> As the area continued to industrialize in subsequent years, larger and more intensive industrial complexes serving the agricultural industry were built. In 1909, a multi-ethnic group of Chinese, Japanese, and Anglo farmers pooled their resources to open City Market, a wholesale produce market at San Pedro and 9<sup>th</sup> streets that eventually encompassed two city blocks.<sup>59</sup> In 1918, an even larger wholesale produce market, known as the Union Terminal Market (listed in the National Register), was constructed at the intersection of Central Avenue and 7<sup>th</sup> Street.<sup>60</sup> Designed by master architect John Parkinson, this property is notable for its immense size; its western façade alone measures a quarter of a mile in length.<sup>61</sup>

Population growth in the 1910s and 1920s sustained additional economic development and introduced many other industrial uses to the blocks east of the central business district. The area's identity as an industrial center was solidified by a sweeping zone change in 1922, which eliminated new residential uses from Downtown.<sup>62</sup> Though the area clung onto some of its historical uses such as Single-Room Occupancy (SRO) hotels, it took on a much more industrial character by the 1920s as factories, printing and publishing plants, machine shops, and various other industries encroached onto blocks that had once been predominantly residential. "Stimulated in part by the arrival of runaway shops evading unionization drives in New York," a concentration of garment factories were erected in the area to the southeast of the central business district beginning in the 1920s, sowing the seeds for a robust wholesale garment trade that today is the second largest in the nation outside of New York.<sup>63</sup> Warehouses and other more utilitarian industrial uses generally clustered in areas further south and east.

The remarkable growth of the central business district and its environs in the early twentieth century was accompanied by an equally remarkable problem – traffic congestion. Traffic jams and snarled streets quickly became issues of epic proportions due to the brisk development of the central business district and a steady increase in the number of automobiles. Further complicating the situation were the hills and buttes flanking the west end of Downtown, which limited the options into and out of the city. The city initiated a number of infrastructure projects in an attempt to improve accessibility and mitigate the worst effects of congestion. Of note were several tunnels that were bored directly through these hills to allow unobstructed circulation along Broadway (1901), Third Street (1901), Hill Street (1909), and Second Street

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<sup>58</sup> "SurveyLA Draft Historic Context Statement, Industrial Development," Aug. 26, 2011, 42-54.

<sup>59</sup> Tara Fickle, "A History of the Los Angeles City Market, 1930-1950," *Gum Saan Journal* 32.1 (2010).

<sup>60</sup> Most of the City Market property has been demolished to make way for a mixed-use development, but the Union Terminal Market remains intact and is listed in the National Register.

<sup>61</sup> "National Register of Historic Places Nomination Form: Textile Center Building," prepared 2004.

<sup>62</sup> Los Angeles Conservancy, "The Arts District: History and Architecture in Downtown L.A.," Nov. 10, 2013.

<sup>63</sup> Mary Romero, et al., *Challenging Fronteras: Structuring Latina and Latino Lives in the U.S.* (New York: Routledge, 2014), 218.

(1924).<sup>64</sup> Also to improve accessibility and alleviate traffic, the Pacific Electric Railway in the 1920s constructed a one-mile stretch of subway between the Subway Terminal Building on Hill Street and the Westlake district (not extant, though some of its infrastructure remains).<sup>65</sup> Completed in 1925, the subway transported passengers between Downtown businesses and adjacent residential areas without traversing a single Downtown street.

In addition to new transportation infrastructure, proliferation of the automobile in the 1910s and 1920s also spawned a commercial enclave to the south and west of the central business district that was oriented around the sale, repair, and maintenance of cars. Capitalizing on the enhanced role that auto travel played, particularly in Southern California, several automobile manufacturers erected large, new showrooms and repair facilities along Figueroa and Flower streets in what is now known as the South Park neighborhood. By the 1910s, the term “auto row” appeared in local newspapers and was used to describe the cluster of showrooms and associated businesses in the area.<sup>66</sup> Throughout Downtown, multi-story “auto parks” were woven into the central business district as early as the 1920s, providing patrons of department stores and other businesses with a convenient place to park their car while shopping. To entice motorists, many of these garages offered on-site services in addition to parking stalls. Some touted a rather robust menu of amenities including “a repair department manned by experts, a lubrication department, and a washing and polishing department ... a complete accessory and tire department with direct factory representation ... [and] a finely appointed ladies’ lounge.”<sup>67</sup>

Pershing Square, which had once been at the far periphery of the city center, emerged as an important focal point of civic life as the central business district migrated to the south and west. In 1910, at the height of the Downtown’s early twentieth century building boom, the park underwent a renovation by master architect John Parkinson, who imposed a formal, symmetrical plan that complemented the Beaux Arts style buildings that were being erected en masse across the central business district. Under Parkinson’s plan, the park was oriented around a central plaza and a network of diagonal walkways, and featured a lush landscaping scheme composed of wide lawns, Italian cypress, and various types of tropical foliage.<sup>68</sup> By the 1920s, the park had become “L.A.’s indispensable civic space... [and was] a place to meet, stroll, muster troops and argue a cause, with a speaker’s corner like London’s Hyde Park.”<sup>69</sup>

### Great Depression and World War II

Downtown Los Angeles had matured into a vibrant district that acted as the commercial, institutional, and industrial hub of the Southern California region by the 1920s. However, it was also around this time that some neighborhoods around Downtown experienced decline as new

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<sup>64</sup> Nathan Masters, “Lost Tunnels of Downtown Los Angeles,” *KCET*, Jan. 4, 2012. The Broadway and Hill Street Tunnels have been removed; the Second and Third Street Tunnels are extant, though the latter has been altered.

<sup>65</sup> *Ibid.*

<sup>66</sup> The terms “auto row” and “automobile row” first appear in *Los Angeles Times* articles from the early 1910s.

<sup>67</sup> “New Garage Has Features for Car Service,” *Los Angeles Times*, Sept. 13, 1925.

<sup>68</sup> Nathan Masters, “From Plaza Abaja to Pershing Square,” *KCET*, May 9, 2012.

<sup>69</sup> Wade Graham, “Why We Hate Pershing Square,” *Los Angeles Times*, Sept. 27, 2015.



development in more peripheral areas of the city slowly began to pull people away from the urban core. This trend was particularly evident in Bunker Hill. Beginning in the early twentieth century, the neighborhood lost its luster as affluent residents incrementally moved away to new residential districts in other parts of the city and, one by one, their stately mansions were subdivided into smaller, multi-family units, “most of which were occupied by single boarders in single rooms.”<sup>70</sup> Apartments and rooming houses that were erected nearby crowded out the mansions, and by about 1920 new construction in the neighborhood had ceased.<sup>71</sup> The condition of buildings deteriorated as they aged and maintenance was deferred. By 1930, local officials were flirting with the possibility of razing the buildings and leveling the hill, likening the area to a “rotten apple in the barrel” that presented “a problem of concern to the entire city.”<sup>72</sup>

The area around the plaza had also languished by the 1920s as the locus of development had shifted southward. Buildings had fallen into various states of disrepair, and since the area was inhabited mostly by poor, disenfranchised immigrant families it did not receive much public investment. Olvera Street, a narrow street extending north from the plaza, was a particularly derelict corridor that “had degenerated over the years into rubbish-strewn neglect.”<sup>73</sup> While walking down Olvera Street in 1928, socialite Christine Sterling was alarmed to learn that the Avila Adobe, Los Angeles’ oldest dwelling, had been condemned and was slated for demolition. Sterling thereafter launched a campaign to preserve the threatened adobe and rehabilitate the surrounding area into a themed marketplace that celebrated California’s Mexican heritage. With the financial support of benefactors including *Los Angeles Times* editor Harry Chandler, and with the help of prisoners who were brought on to carry out the work, Sterling was able to carry out her vision and transformed Olvera Street into a rich, albeit somewhat inauthentic, celebration of Los Angeles’ Mexican heritage. Named El Paseo de Los Angeles, the reinvigorated Olvera Street opened to the public in 1930 and attained instant success as a tourist attraction.<sup>74</sup>

Development activity throughout Downtown was stymied as the economic effects of the Great Depression reverberated. Compared to the prosperous 1910s and 1920s, in which buildings were erected en masse in the central business district and in adjacent areas, the 1930s were characterized by a relative lull in new construction as consumers spent less and local real estate became less lucrative. The development of new, upscale commercial nodes like Miracle Mile and a theater district in Hollywood also began to slowly siphon patrons away from Downtown businesses, shifting the city’s center of gravity away from the central business district and into more suburban settings.<sup>75</sup> However, in spite of these factors Downtown did not cease to be a

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<sup>70</sup> “Residence: 333 South Bunker Hill Avenue,” *On Bunker Hill*, Oct. 20, 2008, accessed May 2016.

<sup>71</sup> Nathan Masters, “Rediscovering Downtown L.A.’s Lost Neighborhood of Bunker Hill,” *KCET*, Jul. 11, 2012.

<sup>72</sup> “Dueling Babcocks,” *On Bunker Hill*, Oct. 20, 2008, accessed May 2016.

<sup>73</sup> Kevin Starr, *Material Dreams: Southern California Through the 1920s* (New York: Oxford University Press, 1990), 204-205.

<sup>74</sup> “Old Los Angeles Comes to Life Again: Thousands Attend Gala Opening of Former Olvera Street,” *Los Angeles Times*, Apr. 21, 1930. Olvera Street and the Avila Adobe are both within the boundaries of the Los Angeles Plaza National Register Historic District.

<sup>75</sup> Roseman, et al. (2004), 61.

focal point of commercial and civic life. Angelenos continued to travel Downtown to shop, and attendance at many of the theaters on and around Broadway remained strong. In 1939, a new passenger rail terminal, Los Angeles Union Station (City HCM #101), opened to the east of the historic plaza and consolidated the numerous rail depots that had historically been located further to the south.<sup>76</sup>

Between the 1920s and 1960s, Downtown was a focal point for Los Angeles' gay, lesbian, bisexual, and transgender (LGBT) community, which at the time was marginalized and subjected to discrimination and harsh treatment from law enforcement and moral crusaders. The area had been a haven for gays and lesbians since the late nineteenth century, who attended masked balls and male and female impersonation acts at local theaters to meet like-minded individuals and engage in nonconforming sexual behavior.<sup>77</sup> Turkish bathhouses in the area also evolved into clandestine gay meeting venues. After the repeal of Prohibition in 1933, a concentration of gay-friendly bars stretched between Bunker Hill and Main Street, along a stretch of Fifth Street that became known as "The Run." Pershing Square, located near the center of "The Run," became a popular "cruising" venue and was frequented by gay and bisexual men seeking sexual partners. Cruising was also a common practice at the nearby Central Library and in the bathrooms of the Subway Terminal Building.<sup>78</sup> Downtown retained an important association with the LGBT community into the postwar era, when gay institutions including a chapter of the Mattachine Society, an early homophile (gay rights) organization, and *ONE* magazine set up their headquarters in the area.<sup>79</sup>

#### Post-World War II Era: Decline and Redevelopment

After World War II, Downtown experienced a period of precipitous decline as middle and upper-income Angelenos vacated urban neighborhoods in favor of suburban environments. As more and more people left the central city for the suburbs, many businesses and institutions followed suit. Downtown's identity as a preeminent shopping and entertainment district was diminished as department stores, theaters, and other businesses that had long been occupants of the area relocated to locations nearer their customer base. Suburban migration was hastened by the construction of a vast network of freeways across Southern California, which rendered these outlying areas more accessible and allowed motorists to circumvent the central business district entirely. Four freeways were constructed near Downtown at this time: the Hollywood (US 101), Harbor (SR-110), and Santa Ana (I-5) Freeways were completed in the early 1950s, and the Santa Monica Freeway (I-10) opened nearly a decade later.<sup>80</sup> Where the 110 and 101 Freeways converged was a remarkable feat of civil engineering known as the Four Level Interchange, which was the first stack interchange in the world when it opened in 1949.<sup>81</sup> These

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<sup>76</sup> David Kipen, *Los Angeles in the 1930s: the WPA Guide to the City of Angels* (Berkeley: University of California Press, 2011), xxiii.

<sup>77</sup> "SurveyLA LGBT Historic Context Statement," Sept. 2014, 5-7.

<sup>78</sup> Los Angeles Conservancy, "Pershing Square," accessed May 2016.

<sup>79</sup> The Mattachine Society and *ONE* magazine occupied a building at 232 S. Hill Street, which is not extant.

<sup>80</sup> Nathan Masters, "Creating the Santa Monica Freeway," *KCET*, Sept. 10, 2012.

<sup>81</sup> "This Day in History: The Famous 'Four Level' Opens in Los Angeles," accessed May 2016.



freeways and their infrastructure forged boundaries around Downtown and effectively walled it in from adjacent communities. The 101 Freeway yielded a particularly profound effect in this regard by severing the connection between the Civic Center and the historic plaza.

As early as the 1950s, urban renewal and redevelopment projects dramatically changed the character and composition of Downtown's built environment, sowing the seeds for the modern skyline that characterizes some of the area in the present day. A particularly transformative project involved the extensive redevelopment of Pershing Square in the early 1950s. By this time, the park had lost its allure and had become known as a gathering place for the homeless and destitute, which drew the ire of nearby business owners and Downtown stakeholders.<sup>82</sup> In response to increasing complaints about the park's deteriorating state, and also in an effort to bring Los Angeles into the modern age of automobile travel, the park was bulldozed in 1951 to accommodate a three-level, subterranean parking garage that was built beneath the square.<sup>83</sup> Some perimeter plantings and a thin layer of grass were added, but otherwise the square was stripped of its lush, park-like qualities. Entrance and exit ramps to the garage dominated the perimeter of the property and forged a physical barrier between the park and its environs.

Using the power vested to its newly-established redevelopment agency, the City identified the once-posh residential neighborhood of Bunker Hill as the site of a massive redevelopment project after World War II. This area had experienced decline since at least the 1930s, but by the late 1940s it had devolved into one of city's most notorious slums. Studies led by the Community Redevelopment Agency of the City of Los Angeles (CRA) in the 1950s concluded that "Bunker Hill had many problems, as about 82 percent of the housing units were deteriorated, overcrowded, unhealthy, and unsafe ... the high cost of health, fire, and police services far exceeded the taxes collected ... [and] the many low-income single men, transients, and indigents who lived there attracted and created a Skid Row type of environment."<sup>84</sup> The neighborhood was also located in an area of Downtown that was ripe with development potential due to its central location and accessibility to freeways. Aided by state and federal legislation that authorized the use of eminent domain and allocated funds for the eradication of blight, the CRA developed an ambitious redevelopment plan for the neighborhood, which called for the wholesale demolition of 30 substandard city blocks, extensive grading of the hill, the platting of a new street system to overcome the area's topography, and the development of a mixed-use district composed of sleek, modern high rises. After years of planning, the Bunker Hill Redevelopment Project was approved by the City Council in 1959.<sup>85</sup>

The redevelopment of Bunker Hill was initiated in 1960 when the CRA initiated the process of purchasing the properties that lay within the identified redevelopment zone. By 1968, every structure atop the hill had been demolished apart from two Late Victorian-era residences that

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<sup>82</sup> Nathan Masters, "From Plaza Abaja to Pershing Square," *KCET*, May 9, 2012.

<sup>83</sup> Los Angeles Conservancy, "Pershing Square," accessed May 2016.

<sup>84</sup> "The Evolution of Bunker Hill: Part Four, The Studies, 1945-1959," *LA Downtown News*, Aug. 10, 1998.

<sup>85</sup> CRA-LA, "Bunker Hill Urban Renewal Project: About the Project Area," accessed May 2016.

had been landmarked and were awaiting relocation to the Heritage Square Museum.<sup>86</sup> Angels Flight (City HCM #4), a funicular from 1901 that had traversed Bunker Hill's steep grade, was also spared from the wrecking ball, though it was dismantled and remained in storage until its reassembly in the 1990s. Starting with the construction of Union Bank Plaza in 1966, Bunker Hill was transformed from a residential district into the "financial and corporate heart of Los Angeles."<sup>87</sup> Over the next several decades, sleek skyscrapers, residential towers, luxury hotels, quasi-public plazas, and an array of museums and cultural facilities were constructed on 25 superblocks that had been assembled by the CRA after the bulk of the hill had been leveled.<sup>88</sup> The redevelopment of Bunker Hill also catalyzed the development of new, corporate office towers and monumental buildings to its immediate south, particularly along 5<sup>th</sup> and 6<sup>th</sup> streets and Wilshire Boulevard. Development gravitated even further to the south in subsequent years. A notable addition to Downtown's economy and built environment was completed in 1972, when the noted architectural firm of Charles Luckman Associates completed the Los Angeles Convention Center at the intersection of Figueroa Street and Pico Boulevard.

While the redevelopment of Bunker Hill was heralded by many civic leaders, city planners, and other champions of urban renewal, the project was also a lightning rod for controversy and was met with fervent resistance, both from neighborhood residents and those who lobbied on their behalf. So that the land could be assembled and prepared for redevelopment, scores of lower-income Angelenos were evicted from their residences, most of which were deemed "blighted," and in many cases were provided less-than-adequate relocation support. Approximately 10,000 people lost their homes and were displaced as a result of the project, and of these many were poor, elderly, or belonged to minority groups that were grossly underrepresented.<sup>89</sup> The residents of Bunker Hill protested the redevelopment plan and were joined by local politicians such as Edward Roybal, who derided the project as benefiting private enterprise at the expense of the poor, but these critics ultimately found themselves "lost in the political shuffle" amid the powerful interests that backed the redevelopment project.<sup>90</sup> In addition to its profound social implications, the project was also criticized for systemically removing nearly a century of local history and neighborhood development in less than a decade.

Many of the buildings erected on Bunker Hill and its environs after World War II benefited from the repeal of Los Angeles' height limit ordinance in 1957, which had long restricted the height of all new buildings (aside from City Hall) to 150 feet.<sup>91</sup> In the absence of these restrictions on vertical growth, many of the buildings comprising Los Angeles' new financial district soared to

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<sup>86</sup> Known as the Salt Box and the Castle, both residences were moved to Heritage Square in 1969 but were subsequently destroyed by fire.

<sup>87</sup> CRA-LA, "Bunker Hill Redevelopment Project Area Implementation Plan: FY 2010-Jan. 2012," Dec. 17, 2009.

<sup>88</sup> CRA-LA, "Bunker Hill Urban Renewal Project: About the Project Area," accessed May 2016.

<sup>89</sup> Dana Cuff, *The Provisional City: Los Angeles Stories of Architecture and Urbanism* (Cambridge: MIT Press, 2000), 301.

<sup>90</sup> Elizabeth A. Wheeler, *Uncontained: Urban Fiction in Postwar America* (New Brunswick: Rutgers University Press, 2001), 90.

<sup>91</sup> Ray Hebert, "No Tall Buildings: Aesthetics, Not Quakes, Kept Lid On," *Los Angeles Times*, Jul, 8, 1985.



unprecedented heights and augmented the city's historically flat skyline. At 40 stories, Union Bank Plaza was the first building to surpass City Hall in terms of height and was soon eclipsed by even taller structures including the 42-story Crocker-Citizens Bank Tower (1969), the 55-story Security Pacific Plaza (1973), and the 62-story United California Bank Building (1973).

Redevelopment activity was not limited to Bunker Hill, but also extended into other areas in Downtown that satisfied the statutory definition of "blight." One of the more transformative and controversial examples of redevelopment activity took place in Little Tokyo, where SRO hotels and aging commercial blocks dominated the landscape and were seen as prime targets for redevelopment. Redevelopment activity in the area began with the expansion of the Los Angeles Civic Center and particularly with the construction of Parker Center in 1955, which displaced some 1,000 residents and culminated in the demolition of nearly one fourth of Little Tokyo's commercial frontage.<sup>92</sup> In 1970, the CRA formally established a Project Area in Little Tokyo and adopted a redevelopment plan that called for widespread demolition of existing buildings and the construction of new housing, office buildings, recreational space, and a community center in their place.<sup>93</sup> The new development that ensued was spearheaded in large part by Japanese corporate interests, and introduced mid-rise office towers and large, contemporary shopping plazas to the area. These new types of commercial development, coupled with the displacement of longtime area residents, many of whom were older Japanese immigrants, "challenged the community's identity which historically had been shaped by the immigrant experience."<sup>94</sup> However, the CRA's involvement in Little Tokyo also bolstered its economy and facilitated the construction of cultural institutions such as the Japanese American Cultural and Community Center, which was constructed in 1978 and opened in 1980.<sup>95</sup>

To the north and east of the new financial district, the Civic Center also experienced a dramatic evolution after World War II. While a Civic Center Master Plan had been adopted in the 1920s, and while three new public buildings had been erected under its auspices, the plan was never fully implemented due largely to financial constraints imposed by the Great Depression. In response to rapid population growth that affected both the City and County of Los Angeles after World War II, an agency known as the Civic Center Authority stressed the need to expand and centralize governmental services in a unified and cohesive civic center district. Their efforts culminated in the conception of a new, monumental Civic Center Plan in 1947.<sup>96</sup> The 1947 plan abandoned the north-south axis embraced by its predecessor and instead pivoted the trajectory of civic development to the east and west.<sup>97</sup> The plan called for large civic buildings to flank either side of a central axis that would act as the complex's "spine." Several

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<sup>92</sup> Kelly Simpson, "Three Waves of Little Tokyo Redevelopment," *KCET*, Aug. 1, 2012.

<sup>93</sup> *Ibid.*

<sup>94</sup> *Ibid.*

<sup>95</sup> Japanese American Cultural and Community Center, "History," accessed May 2016.

<sup>96</sup> Los Angeles Conservancy, "Kenneth Hahn Hall of Administration/Stanley Mosk Courthouse," accessed May 2016.

<sup>97</sup> "Civic Center: A Plan of Expansion Unfolds," *Los Angeles Times*, Jan. 2, 1948.



monumental buildings that house an array of government operations were erected in the area between the 1950s and early 1970s.

Unlike many of the nation's cities, whose central business districts were often decimated to make way for new downtowns, a majority of the historic building stock in Los Angeles remained intact. However, the westward shift of the financial district after World War II resulted in the razing of several iconic buildings and put others at risk of being demolished. To the chagrin of many Angelenos, particularly those with an interest in architecture and historic preservation, the Richfield Tower (1929), whose distinctive, black-and-gold façade rendered it one of the city's finest examples of the Art Deco style, was razed in the late 1960s and replaced by a pair of modern corporate office towers.<sup>98</sup> Other buildings suffered a similar fate, particularly those that were located around the emerging financial district and those that sat atop Bunker Hill. However, out of this trend emerged a preservation ethic among those who were interested in conserving and celebrating the city's past. After the Central Library (1926, City HCM #46) was slated for demolition in the late 1970s, a group of concerned citizens mobilized to save it. Their efforts, which ultimately proved successful, resulted in the establishment of the Los Angeles Conservancy, which is today the country's largest local non-profit preservation organization.<sup>99</sup>

As Downtown businesses moved to the suburbs, and offices and financial institutions relocated to new skyscrapers erected on and around Bunker Hill, older commercial buildings in the Historic Core were slowly, but steadily, vacated. By the 1970s, many of these buildings were unoccupied above the ground story, and some were abandoned altogether.<sup>100</sup> While a vast majority of the area's historic buildings remained intact, some were demolished and replaced by surface parking lots, which were seen by some investors as more lucrative than the vacant and often derelict buildings that they replaced. By the 1980s, the once-vibrant commercial heart of Los Angeles had become overridden by the sale and use of illicit drugs, homelessness, and other problems afflicting the nation's cities. Spring Street, which had been a thriving financial hub, became known for its motley crew of panhandlers, the mentally ill, drug addicts, and hawkers of goods "probably not obtained through the usual wholesale sources."<sup>101</sup> One area of the Historic Core that was able to remain vibrant was Broadway, which by this time had evolved into a bustling commercial district among the Latino community.

Homelessness and other social problems were even more rampant in the area located to the east of Main Street and the Historic Core, which had become known as Los Angeles' "Skid Row." Since the late nineteenth century, this area had been the domain of an indigent population because of its abundance of residential hotels adjacent to early rail terminals. These

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<sup>98</sup> David Gebhard and Robert Winter, *An Architectural Guidebook to Los Angeles* (Salt Lake City: Gibbs Smith, 2004), 242.

<sup>99</sup> Los Angeles Conservancy, "Central Library," accessed May 2016.

<sup>100</sup> City of Los Angeles, "Central City Community Plan," n.d., I-9.

<sup>101</sup> Bill Boyarsky, "There is a Los Angeles on Which the Recovery's Light Has Yet to Shine, *Los Angeles Times*, Jan. 1, 1984.

hotels provided cheap, short-term accommodations and were accompanied by several missions that had long operated nearby to provide “a sermon and a cup of soup for the population of hard-drinking single men.”<sup>102</sup> The area’s reputation as a bastion of urban disorder was solidified by a “policy of containment” that was adopted by the city in 1975, which sought to concentrate social service agencies and homeless individuals in an area bounded by 3<sup>rd</sup>, 7<sup>th</sup>, and Main streets and Central Avenue.<sup>103</sup> Despite the best efforts of social service organizations and not-for-profit agencies such as the Skid Row Housing Trust, which has converted thousands of dilapidated Single-Room Occupancy (SRO) hotel rooms in the area into affordable housing units, Skid Row continues to house one of the largest stable populations of homeless individuals in the United States.

Native Americans in Downtown Los Angeles were especially afflicted by homelessness in the postwar era. Spurred by the Indian Relocation Act of 1956, a federal law that encouraged Native Americans to leave reservations and assimilate into the general population, Los Angeles’ Native American population “swelled from 12,000 in 1960 to 25,000 in 1966.”<sup>104</sup> Due to a long history of marginalization, many of the Native Americans who arrived in Los Angeles from other parts of the country ended up homeless and addicted to alcohol and other substances. Many congregated along the 400 block of Werdin Place, a narrow alley that runs between Winston and Fifth streets, between Main and Los Angeles streets, which became known as “Indian Alley” and earned a reputation for its particularly dangerous conditions. However, the alley also served as a “central point where people came together and were able to find their relatives after relocation.”<sup>105</sup> An effort to improve conditions on Indian Alley was spearheaded in 1973, when a drug and alcohol treatment center known as United American Indian Involvement, Inc. (UAIL) set up shop in a derelict, three-story building at the corner of Winston Street and Werdin Place. Founded by Baba Cooper, who was reportedly Sioux, UAIL provided “hot meals, showers, beds, referrals, and emergency medical care” to homeless Native Americans, and was staffed entirely by those of Native American descent.<sup>106</sup> Though UAIL has since relocated, the Native American heritage of Indian Alley has been resurrected by the installation of murals and other examples of street art depicting significant themes and motifs in Native American culture.

Once a focal point of civic life among those who lived and worked Downtown, Pershing Square became a particularly evocative symbol of the challenges afflicting urban environments after World War II. The park devolved into a refuge for the homeless and indigent as businesses and people vacated the Historic Core. The *Los Angeles Times* in 1984 noted that “drunks and a plethora of down-and-outers tarnished the square.”<sup>107</sup> Efforts to revitalize the park were complicated by the parking access ramps that were added to its perimeter in the 1950s, which

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<sup>102</sup> “For Some, L.A.’s Skid Row is for Beginnings,” *NPR*, Apr. 20, 2009.

<sup>103</sup> *Ibid*; Los Angeles Area Chamber of Commerce, “History of Downtown Los Angeles’ ‘Skid Row,’” n.d.

<sup>104</sup> Christina Rose, “Skid Row’s Indian Alley Adorned with Native Murals to Honor Tragic Past,” accessed June 2016.

<sup>105</sup> *Ibid*.

<sup>106</sup> Nicolas G. Rosenthal, *Reimagining Indian Country: Native American Migration and Identity in Twentieth Century Los Angeles* (Chapel Hill: University of North Carolina Press, 2012), 129.

<sup>107</sup> Cecilia Rasmussen, “The (D)evolution of a Downtown Landmark,” *Los Angeles Times*, Aug. 19, 2007.



forged a barrier between Pershing Square and its environs and created an environment that many criticized as inhospitable. After financing a minor facelift of the park in preparation for the 1984 Olympics, the City embarked upon an overhaul of Pershing Square in 1992 which was carried out by architect Ricardo Legorreta, landscape architect Laurie Olin, and artist Barbara McCarren. When it re-opened in 1994, the park touted a completely new appearance with abundant hardscape features, vivid geometric structures, and a ten-story bell tower. Its design also incorporated many public art pieces and design features – including an orange grove and a stylized earthquake fault – that allude to themes in the history of Southern California.<sup>108</sup>

#### Contemporary Development and Revitalization

Some areas within the CPA suffered from deterioration in the postwar era, but Downtown was also home to an increasingly enlivened visual and performing arts culture at this time. The area's identity as a center of arts and culture was set into motion in the 1960s, when the architectural firm of Welton Becket and Associates, in collaboration with philanthropist Dorothy Buffum Chandler, developed a monumental performing arts complex at the north end of Bunker Hill. Known as the Music Center, the complex hosted numerous events including the Academy Awards, and was touted as "one of the nation's foremost cultural sites."<sup>109</sup> Other arts institutions subsequently opened nearby. In 1983, the Museum of Contemporary Art (MOCA) opened an exhibition space near Little Tokyo called the "Temporary Contemporary" before moving to a permanent site on Grand Avenue in 1986.<sup>110</sup> Construction of the performing arts-oriented Colburn School (1998), Walt Disney Concert Hall (2003), and the Broad museum (2015) have solidified Grand Avenue's identity as a focal point of the arts in Los Angeles. The arts and culture scene in Los Angeles has further been bolstered by the adoption of percent-for-art programs by both the CRA and the City's Department of Cultural Affairs, which require that a percentage of construction costs be earmarked for public art projects. These programs have resulted in the addition of many vivid and evocative art installations throughout Bunker Hill, the Financial District, and the Civic Center, which enliven the built environments of these areas.

After languishing for decades, the Historic Core experienced a renaissance beginning in the early 2000s that has transformed the neglected district into a vibrant live-work community. The resurgence of Downtown is attributed to myriad factors, some of which are more structural – such as increased interest in urban environments among young, educated adults – and others which are the direct result of policy initiatives and redevelopment directives. What is generally considered to be the single greatest policy influence on the area's revitalization was the adoption of the City's Adaptive Reuse Ordinance in 1999, which encouraged the conversion of the area's abandoned commercial buildings into residential units by expediting project review and easing certain code and zoning requirements for historic buildings.<sup>111</sup> In 2008, City Councilman Jose Huizar unveiled a revitalization plan for the Broadway corridor called Bringing

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<sup>108</sup> Los Angeles Conservancy, "Pershing Square," accessed June 2016.

<sup>109</sup> "Music Center Heralded as Cultural Milestone," *Los Angeles Times*, Jul, 10, 1960.

<sup>110</sup> University of Southern California, "Museum of Contemporary Art," accessed May 2016.

<sup>111</sup> City of Los Angeles Office of Historic Resources, "Adaptive Reuse Ordinance," accessed May 2016.



Back Broadway, which has enlivened the streetscape and has facilitated new commercial development along the street.<sup>112</sup> Due in large part to these policy initiatives, Downtown has experienced a tremendous amount of residential and commercial development and is touted as one of the nation's most up-and-coming urban areas, with a young professional population and some of "the city's hippest new restaurants and boutiques."<sup>113</sup> Public facilities such as Grand Park (2008) and Spring Street Park (2013) have opened to serve the area's steadily-increasing resident base. The area's oldest public park, Pershing Square, is on the cusp of a major remodel that will replace the present-day park design completed by Legorreta and Olin in 1992.

To the south and west of the Historic Core, the South Park neighborhood has also experienced a significant wave of new development since the early 2000s. "Dismissed for decades as an asphalt-laden wasteland" composed of small warehouses, apartment houses, and parking lots, South Park experienced a boon in 1999 when the Staples Center, a new multi-purpose sports arena, opened adjacent to the Los Angeles Convention Center and helped to cement the area's identity as a dynamic entertainment district.<sup>114</sup> Since the early 2000s, many mid and high-rise apartment, condominium, and hotel projects have been completed and have transformed the area's once-moribund blocks into a vibrant, mixed-use urban community. In 2007, the area made headlines as the site of the first new full-service grocery store to open in Downtown in several decades.<sup>115</sup> L.A. Live, a contemporary entertainment and retail complex complete with restaurants, shops, theaters, museums, and associated commercial uses, opened between 2007 and 2009 and instantly became a destination and prominent anchor of South Park. The neighborhood, like many other areas in Downtown, is poised to evolve even more in coming years as many new development projects are either under construction or in the pipeline.

## Designated Resources

The following map depicts the location of designated resources within the Central City CPA at the time of the survey. These include properties listed in the National Register of Historic Places (NR) and/or the California Register of Historical Resources (CR), California Historical Landmarks (CHL), and locally designated Los Angeles Historic-Cultural Monuments (HCM).

Many properties within the CPA have already been designated and were not evaluated as part of SurveyLA. This includes four historic districts that are listed in the National Register: the Los Angeles Plaza Historic District (designated 1972), the Broadway Theater and Commercial District (1979), the Spring Street Financial District (1979), and the Little Tokyo Historic District (1986, also listed as a National Historic Landmark in 1995). In addition, 113 properties are

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<sup>112</sup> Richard Guzmán, "A Halfway Point for Bringing Back Broadway," *Los Angeles Downtown News*, Feb. 4, 2013.

<sup>113</sup> Tamara Audi, "Los Angeles Gets Serious About its Downtown," *The Wall Street Journal*, Dec. 27, 2013.

<sup>114</sup> Roger Vincent, "Downtown L.A.'s South Park Catching a Wave of New Development," *Los Angeles Times*, Jan. 19, 2014.

<sup>115</sup> Jones Lang LaSalle, "South Park Emerging as Downtown's Most Vibrant District," Dec. 2013, 3.

individually listed as Historic-Cultural Monuments, and many others are individually listed in the National Register and/or California Register. Currently, there are no locally-designated Historic Preservation Overlay Zones (HPOZ) located within the CPA. For the most up-to-date information on designated resources refer to [ZIMAS.lacity.org](http://ZIMAS.lacity.org) and [HistoricPlacesLA.org](http://HistoricPlacesLA.org), or contact the Los Angeles Department of City Planning's Office of Historic Resources.

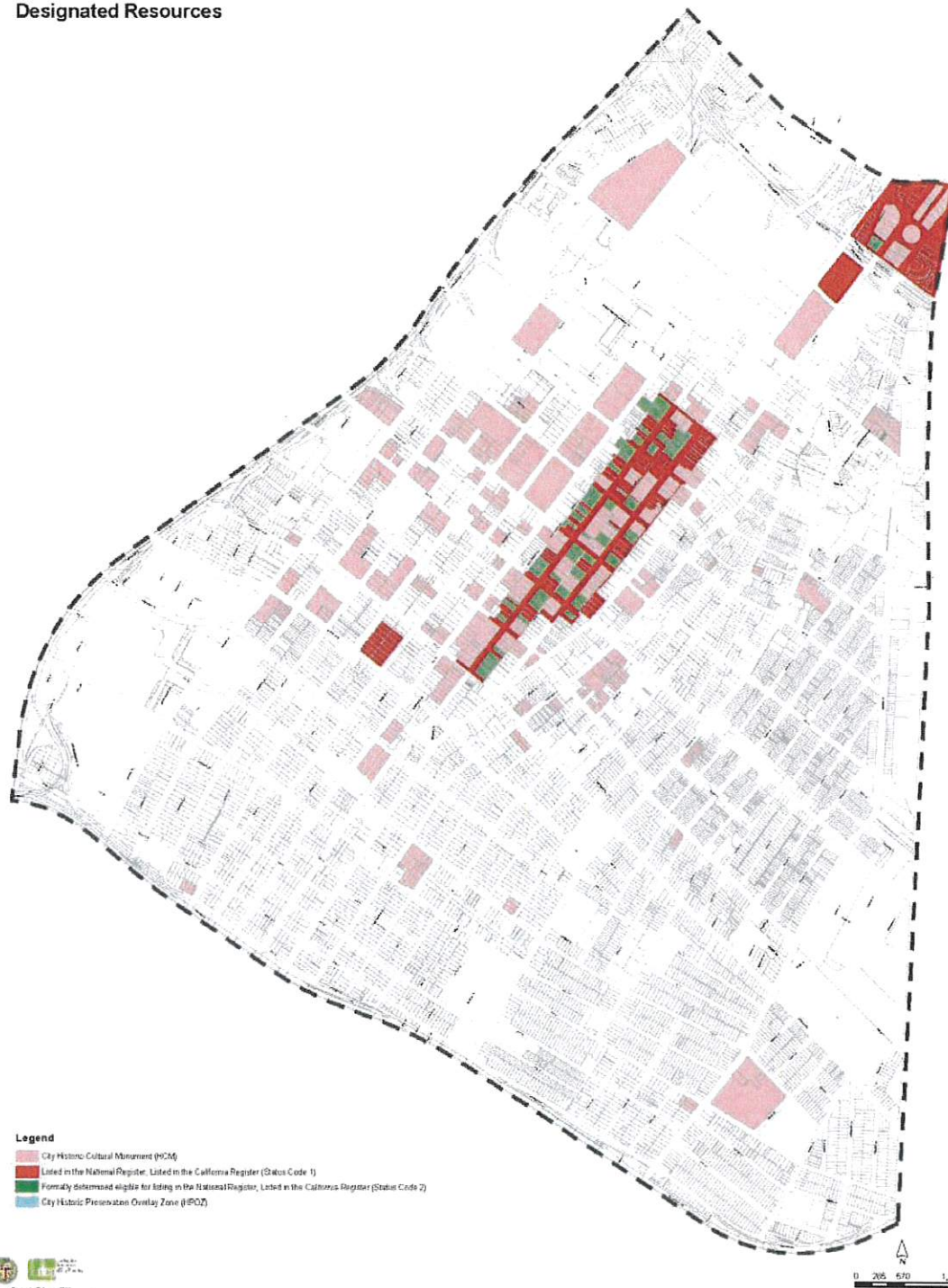
In 2009, a number of properties in the CPA were surveyed as part of the federal Section 106 and California Environmental Quality Act (CEQA) review processes for the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector project. This project involves the construction of a new subway line and associated infrastructure between the Financial District and Little Tokyo. The survey evaluated buildings and planning features within the project area against eligibility criteria for the National Register and California Register. Several resources were determined to be individually eligible for federal and/or state listing, and a grouping of buildings and site features in the Civic Center was identified as a National Register-eligible historic district. Resources identified as eligible in the Regional Connector survey were recorded as part of SurveyLA.<sup>116</sup> SurveyLA also recorded two other historic districts that had previously been determined eligible through the Section 106 review process: a commercial district near the intersection of Main and 5<sup>th</sup> streets, and a district of Single-Room Occupancy (SRO) hotels located in Central City East. Resources that were formally determined eligible for listing through the Section 106 review process are listed in the California Register.

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<sup>116</sup> The Regional Connector survey evaluated eligibility for listing in the National Register (NR) and California Register (CR). In a few instances, properties that were deemed ineligible for the NR or CR were found to meet local eligibility criteria by the SurveyLA team. Local eligibility was not assessed by the Regional Connector survey.



# Central City Designated Resources





## Community Plan Area Survey Methodology

The survey of the Central City CPA was conducted using the methodology established by the OHR for SurveyLA which includes the Citywide Historic Context Statement and customized mobile Field Guide Survey System (FiGSS).<sup>117</sup> Concurrent with the survey of the Central City CPA, one additional survey, Central City North, was also surveyed.

The fieldwork was conducted in two phases: *reconnaissance* and *documentation*. The reconnaissance phase was conducted by the project managers and key staff of both CPA surveys, all of whom meet the Secretary of the Interior's *Professional Qualifications Standards*. This phase involved a detailed and methodical review of each neighborhood, street, and individual property within the Survey Area. It was during this phase that decisions were made about which properties and districts should be documented, and how those properties should be evaluated. During this initial reconnaissance phase, surveyors reviewed pre-loaded data submitted by community members to MyHistoricLA, identified concentrations of resources that might later be recorded as eligible historic districts and planning districts, and developed lists of pre-field research tasks that would help inform the field survey. By making these decisions up front and as a team, this methodology ensures a more thoughtful approach to resource identification and evaluation, creates greater consensus among the field survey teams, and produces more consistent survey results across CPAs. This approach also substantially streamlines the next phase of field survey, enabling the field teams to document large numbers of properties quickly and efficiently.

During the reconnaissance phase, ARG created Geographic Information Systems (GIS) maps of each neighborhood; these maps were printed for use in the field. A blank map showing only street names, address numbers, and parcel lines was used by surveyors in the field for notes and comments about resources identified during the reconnaissance phase. Another map featured parcels shaded by decade of building construction, which helped to illustrate chronological development patterns and concentrations of resources.

Once the reconnaissance phase was completed, the documentation phase began. During this phase, fieldwork was conducted by teams of two. Properties that were identified during the previous phase, along with those that had significant associative qualities identified in pre-loaded data in FiGSS, were recorded and evaluated for potential historic, cultural, or architectural significance. Documentation included a digital photograph, recordation of historic features and subsequent alterations, and the reason for a property's potential historic significance. It was also during this phase that contexts and themes were applied and evaluation status codes were assigned.

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<sup>117</sup> For more information about the SurveyLA methodology, see the *SurveyLA Field Results Master Report*.

Surveyed properties included residential, commercial, institutional, and industrial buildings and important landscape and infrastructure features such as bridges, designed landscapes, and public art. All fieldwork was conducted from the public right-of-way. Following the completion of fieldwork, all survey data was reviewed in detail by a qualified survey professional to ensure accuracy and consistency throughout the data set.

Survey teams conducted research on individual properties and neighborhoods throughout the field survey process. When specific information was needed in order to complete an evaluation, additional research was conducted. Sources included building permits, historical newspapers and periodicals, Sanborn maps, tract maps, and city directories. Other sources include the collections of the Los Angeles Public Library; Online Archive of California; University of Southern California (USC); University of California, Los Angeles (UCLA); and the Library of Congress archives. This research helped with the identification of historic tract names and boundaries, names of tract subdividers, dates of subdivision, and original building uses and footprints.

Many properties within the CPA are also located within the boundaries of a Community Redevelopment Agency (CRA) project area. While the CRA commissioned historic resource surveys of several Downtown project areas, none of these surveys were completed recently. Consistent with SurveyLA methodology, parcels within CRA project areas were re-evaluated as part of SurveyLA. Findings from previous CRA surveys were referenced as needed.

# Summary of Findings

The following discussion of Property Types, Contexts, and Themes relates to the resources identified and recorded as eligible for designation.

## Summary of Property Types

In terms of land use, the Central City CPA is very diverse and includes a variety of residential, commercial, institutional, and industrial properties. These properties were built over a broad period that ranges from the nineteenth century to the present-day. Accordingly, resources identified in the survey encompass an array of property types and periods of development, with commercial, institutional, and industrial resources being the most common. Less common, but present nonetheless, are residential properties, particularly multi-family, and urban open spaces. Following is a summary of the property types within the CPA that were documented and evaluated as significant.

### *Residential Properties*

Since Downtown Los Angeles is predominantly a center of commerce, government, and industry, residential development accounts for a relatively small proportion of the Central City CPA's built environment. Relatively few residential resources were identified by the survey. This included one single-family residence that was constructed in 1908 and is located in an area that is now predominantly industrial. It is notable as the last known intact example of a single-family house in the area. The survey also identified several early apartment houses that were built between the early 1900s and 1920s, and are also rare vestiges of early residential development. All of these apartment houses are located in the South Park neighborhood. Most are simple buildings that do not embody a particular architectural style, but one was also evaluated as an excellent example of Renaissance Revival architecture. Other residential resources include a 1970s apartment tower that is notable for its modular construction, and a high-rise residential complex on Bunker Hill that played an important role in the redevelopment of the area after World War II and is also an excellent example of Corporate International architecture.

### *Commercial Properties*

Since it has long been an important center of commerce and finance, Downtown Los Angeles consists of numerous commercial resources, most of which are concentrated along corridors in the Historic Core and on superblocks in both Bunker Hill and the Financial District. Commercial resources were constructed between the late nineteenth century and the present day, and mirror the development and evolution of Downtown Los Angeles over time. Given this history, commercial properties account for a majority of resources identified in the survey; eligible



commercial property types include both individual resources and concentrations of resources (historic districts and planning districts).

Many of the commercial properties identified as individually eligible resources are mixed-use commercial buildings that were constructed between the 1910s and 1930s. Generally constructed with retail stores on the ground story and offices up above, these resources typify patterns of early twentieth century commercial development and the growth of Los Angeles' central business district. These buildings were almost always designed by noted architects and were evaluated as excellent examples of their respective architectural styles, with Beaux Arts, Renaissance Revival, and Art Deco being the most common.

Several examples of commercial lodging were identified as individually eligible resources. Specifically, the survey identified several hotels that were constructed in the early decades of the twentieth century, when the central business district was at its peak and Downtown was an important regional destination. In addition to conventional hotels, some examples of residential hotels were also identified as individual resources. Three residential hotels were identified as establishments that catered to Chinese American and African American laborers, who were employed in nearby industries but were excluded from many commercial establishments because of widespread discrimination. Others were evaluated as rare intact examples of the property type. Two small historic districts composed of early twentieth century Single-Room Occupancy (SRO) hotels were also identified by the survey. One example of a 1970s hotel building was evaluated as an excellent example of Late Modern architecture.

The survey identified properties that are individually eligible for their association with the early rise of the car and car culture. Included were several early automobile showrooms dating to the 1910s and 1920s; accessory shops, repair facilities, and other commercial uses geared toward motorists; and three examples of parking structures that date to the 1920s and are among the earliest known examples of the property type in the city. Also identified was a parking structure that was designed by noted architects Wurdeman and Becket in 1948, and was the first parking structure to be erected following the adoption of a City ordinance that required new buildings in Downtown to be accompanied by parking.

Other examples of commercial properties that were identified as individual resources include department stores dating to the early twentieth century; three examples of motion picture theaters built in the 1910s and 1920s; one example of a commercial complex notable for its association with the local fashion industry; former bank buildings that are located outside of the National Register-designated Spring Street Financial District boundaries; a handful of stores and restaurants; and several postwar office towers that are excellent examples of the Corporate International style and, in many instances, are also significant for their association with patterns of corporate growth and development after World War II. Some of these office towers are accompanied by significant designed landscapes and notable examples of public art.

The survey also identified a number of important, long-term businesses that contribute to the commercial identity of Los Angeles and are regarded as local institutions.

Three commercial historic districts and one commercial planning district were identified in the Survey Area. Two of the historic districts represent early twentieth century patterns of commercial growth and development Downtown. Each district also contains an excellent concentration of early twentieth century commercial architecture, with many notable examples of the Beaux Arts style. Several of the contributing buildings within these districts were also evaluated as individually significant resources as part of SurveyLA. The third historic district contains an excellent concentration of late nineteenth and early twentieth century commercial architecture. The planning district is significant for its association with Los Angeles' garment and textile industries, linchpins of the local economy. Since it is defined largely by its ephemeral qualities and not by its buildings or physical fabric, it does not meet eligibility standards as a historic district but may merit special consideration in local planning.

### ***Industrial Properties***

Industrial development in the Survey Area is generally confined to the area east of Main Street, which is one of the city's primary industrial zones. Industrial properties represent the third most common resource type in the Survey Area after commercial and institutional properties.

Most of the industrial resources identified in the survey were evaluated as individual resources. Some were evaluated because they represent very early patterns of industrial development in the area and are rare, intact examples of industrial properties from the late nineteenth and early twentieth centuries. Most others were evaluated as excellent examples of a particular industrial property type, such as a daylight factory or industrial loft, or for their association with a specific industry important to the economy of Los Angeles including garment manufacturing, agriculture, or food processing. Two industrial properties were evaluated since they were the site of strikes or other incidents related to the city's labor history. Two industrial resources were evaluated and recorded as historic districts.

Generally, industrial properties identified in the survey lack architectural distinction and are simple, utilitarian buildings. However, some were designed by noted architects and builders and/or are excellent examples of a particular architectural style. Of note are seven industrial lofts from the 1920s that were designed by architect W. Douglas Lee and built by contractor Florence C. Casler. Casler was an influential figure in the early industrial development of Los Angeles and helped to break down gender barriers in the construction industry, which at the time was dominated by men. She is notable as one of very few influential industrialists of her era. Buildings associated with Casler are designed in the Late Gothic Revival style, and stand out for their high quality design and impeccable attention to architectural detail.



The Garment Industry Planning District was identified by the survey, which includes a concentration of buildings that are associated with Los Angeles' garment and textile industries. These buildings collectively evoke a distinctive sense of place and reflect patterns of development related to the garment and textile trades, both of which have been important facets of the city's industrial economy since the 1920s. Since many buildings have been altered and a considerable amount of infill development has taken place, the district does not appear to retain sufficient integrity for historic district designation but may merit special consideration in local planning.

### ***Institutional Properties***

The survey identified a number of public and private institutional properties, which are not concentrated in a specific section of the Survey Area but are rather interspersed throughout its boundaries. Eligible institutional property types were recorded both as individual resources and as districts, depending on the number of significant resources present at a given site.

Institutional resources consist largely of public buildings that were built to accommodate the growth of Downtown and surrounding areas. Specifically, the survey identified four Department of Water and Power (DWP) facilities, including both distribution and receiving stations; two fire stations; two examples of telephone exchange buildings; a rare example of a pre-World War II post office; an LAUSD middle school campus dating to the post-1933 Long Beach Earthquake period of school construction; and a public health administration complex that is significant for its role in the expansion of health and medicine and was also evaluated as an excellent example of Corporate International architecture. Four examples of performing arts venues were also evaluated, which were privately funded but are regarded as civic institutions. Several examples of public art were identified, most of which are associated with an eligible building or complex.

Private institutions include two religious buildings that date to the 1920s and 1930s and are rare remaining examples of religious property types in the area, three examples of religious buildings that are significant for their association with a particular ethnic or cultural group, and three examples of buildings that were erected for important fraternal organizations. One example of a cultural and community center serving the Japanese American community of Little Tokyo was also evaluated as an individually eligible resource.

Four resources were identified as institutions important to Los Angeles' lesbian, gay, bisexual, and transgender (LGBT) community. This includes a former theater where LGBT individuals attended masked balls, a Turkish bathhouse that has been in continuous operation since 1906 and is the City's oldest gay bathhouse, and the former sites of two influential gay bars.

The survey recorded one institutional historic district that encompasses the Los Angeles Civic Center, and is composed of fifteen contributing buildings and several associated site features. The district is significant for its association with master planning efforts related to the Civic



Center, and also as an excellent concentration of various architectural styles as applied to an institutional context. This historic district had previously been determined eligible for the National Register and California Register through the federal Section 106 and California Environmental Quality Act (CEQA) review processes for the Los Angeles County Metropolitan Transportation Authority (Metro) Regional Connector Transit Corridor project. This SurveyLA evaluation recorded the findings of the previous survey.

Some institutional resources were recorded as non-parcel resources. This includes twelve air raid sirens that are associated with civil defense efforts during World War II and the Cold War. The survey also identified several excellent, cohesive concentrations of historic streetlights that were installed by the Bureau of Power and Light in the early decades of the twentieth century.

### ***Other Properties***

The survey identified three significant examples of public infrastructure. This includes a concrete tunnel (Second Street Tunnel) that dates to the 1920s, and an overpass (Temple Street Grade Separation) that was built by the Works Progress Administration in the late 1930s and was the nation's first diamond interchange. Both were constructed as part of a concerted effort on the part of public officials to alleviate traffic congestion Downtown. Also identified was a segment of a retaining wall that delineated a rooming house on Bunker Hill, which is a very rare remaining example of a site feature associated with the community prior to its redevelopment. The survey identified a network of elevated pedestrian corridors, or "pedways," in Bunker Hill.

## **Summary of Contexts and Themes**

Many of the Contexts and Themes developed as part of the SurveyLA Citywide Historic Context Statement are represented in the Central City CPA. Following is a representative sampling of some of the more common Context/Theme combinations that were used in the Survey Area, as well as several combinations that are either particularly representative or unique components of the area's developmental history. Each Context/Theme combination listed is illustrated with specific examples from the Survey Area.

Appendix A includes a complete list of all individual resources identified as meeting eligibility standards and criteria for the National Register, California Register, and/or HCM/HPOZ.

Appendix B includes a complete list of all non-parcel resources identified as meeting eligibility standards and criteria for the National Register, California Register, and/or HCM/HPOZ.

Appendix C includes a complete list of historic districts identified as meeting eligibility standards and criteria for the National Register, California Register, and/or HCM/HPOZ. This appendix also

includes Planning Districts, which do not meet eligibility standards and criteria for listing but may warrant special consideration for local planning purposes.



## Context: Commercial Development, 1850-1980

### Theme: Hotels, 1880-1980

In the early twentieth century, the hospitality industry flourished in Downtown Los Angeles as the area was experiencing an unprecedented wave of commercial growth. Numerous hotels were erected both within and around the central business district to accommodate the scores of visitors who arrived in Los Angeles by train. This Context/Theme combination was used to evaluate extant hotels that date to the early twentieth century and reflect the early growth and prominence of Los Angeles' central business district. These hotels range from more modest operations such as the St. George (top left) and El Rey (top right), to middle-of-the-road accommodations such as the Stillwell (bottom right), to the Rosslyn (bottom left), which upon its construction was considered to be the most opulent hotel in the city. Many were also evaluated as an excellent example of an architectural style and were designed by a noted architect.



**Name:** Hotel Bisbee/St. George Hotel

**Address:** 115 E. Third St.

**Architect:** Arthur L. Haley

**Date:** 1905



**Name:** El Rey Hotel

**Address:** 511 E. Sixth St.

**Architect:** Charles F. Whittlesey

**Date:** 1926



**Name:** Hotel Rosslyn

**Address:** 111 W. Fifth St.

**Architect:** Parkinson and Bergstrom

**Date:** 1912



**Name:** Hotel Stillwell

**Address:** 838 S. Grand Ave.

**Architect:** Noonan and Kysor

**Date:** 1913



## **Context: Commercial Development, 1850-1980**

### **Theme: Department Stores, 1920-1980**

Prior to World War II, almost all of Los Angeles' premiere department stores were located in the central business district, with high concentrations along the Seventh Street and Broadway commercial corridors. Department stores including the Broadway, Bullocks, Hamburgers/the May Company, and many other local retailers had a presence Downtown, which was the center of commercial activity in the city before suburban shopping malls eclipsed the central business district after World War II. This Context/Theme combination was used to evaluate five early department stores in the Survey Area. In addition to their association with commercial development, two of the buildings (top row), which were constructed for the Coulter's Dry Goods and Ville de Paris department stores, were also evaluated as excellent examples of Beaux Arts commercial architecture. Both were designed by noted architects Dodd and Richards.



**Name:** Coulter's Dry Goods Store

**Address:** 500 W. Seventh St.

**Architect:** Dodd and Richards

**Date:** 1917



**Name:** Ville de Paris

**Address:** 420 W. Seventh St.

**Architect:** Dodd and Richards

**Date:** 1917



**Name:** Famous Army and Navy Department Store

**Address:** 531 S. Los Angeles St.

**Architect:** Curlett and Beelman

**Date:** 1926



**Name:** Dearden's Home Furnishings

**Address:** 700 S. Main St.

**Architect:** John Parkinson (remodel)

**Date:** 1904

## **Context: Commercial Development, 1850-1980**

### **Theme: Commercial Development and the Automobile, 1910-1980**

#### **Sub-Theme: The Car and Car Services, 1910-1960**

Reflecting the increasing popularity and accessibility of automobile travel, a number of auto-oriented commercial properties were developed in and around the central business district in the early twentieth century. Significant examples of auto-oriented commercial development were evaluated using this Context/Theme combination. These resources include several early examples of automobile showrooms (top row) that clustered to the south and west of the central business district in what is now known as South Park; and three examples of parking structures (bottom row) that were constructed in the 1920s and are among the earliest known examples of the property type in Los Angeles. Many of the parking structures included washing, detailing, and maintenance on-site and touted these services as a way to lure in customers.



**Name:** Willys-Knight Building  
**Address:** 425 W. Eleventh St.  
**Architect:** Morgan, Walls and Morgan  
**Date:** 1919



**Name:** Felix Chevrolet  
**Address:** 1201 S. Grand Ave.  
**Architect:** William Richards  
**Date:** 1931



**Name:** Santee Public Garage  
**Address:** 840 S. Santee St.  
**Architect:** Burnett and Dodge  
**Date:** 1926



**Name:** Auto Center Garage  
**Address:** 746 S. Hope St.  
**Architect:** Noerenberg and Johnson  
**Date:** 1925



## Context: Commercial Development, 1850-1980

### Theme: Commercial Identity, 1920-1980

Downtown Los Angeles is home to several long-term businesses that, over time, have evolved into local commercial institutions. Such businesses have played an integral role in defining the area's commercial identity. This Context/Theme combination was used to evaluate local businesses that are well-known components of Downtown's commercial landscape. Several of these businesses (top row) are significant for their association with one of the many ethnic enclaves that have historically developed at the edges of the central business district. Others have been in operation for many decades such as the King Eddy Saloon (bottom left), which has officially been in operation since the lifting of Prohibition in 1933 but is rumored to have been "fronted" by a piano shop in previous years, when the consumption of alcohol was illegal. This Context/Theme combination was also used to evaluate one planning district, Santee Alley (bottom right), which has been a key destination among fashion connoisseurs since the 1970s.



**Name:** Japanese Village Plaza

**Address:** 335 E. Second St.

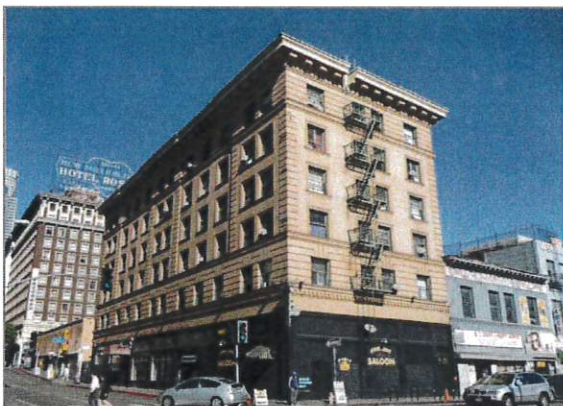
**Date:** 1978



**Name:** Paul's Kitchen

**Address:** 1012 S. San Pedro St.

**Date:** 1968



**Name:** King Eddy Saloon (inside King Edward Hotel)

**Address:** 121 E. Fifth St.

**Date:** 1933



**Name:** Santee Alley Commercial Planning District

**Location:** Santee Alley, between Olympic Bl. and 12<sup>th</sup> St

**Date:** c. 1975

## **Context: Public and Private Institutional Development, 1850-1980**

### **Sub-Context: Government Infrastructure and Services, 1850-1980**

#### **Theme: Municipal Water and Power, 1916-1980**

Population growth in and around Downtown necessitated the expansion of municipal services related to the distribution of power. Three examples of distributing stations associated with the Department of Water and Power (DWP) were evaluated using this Context/Theme combination. One of the distributing stations (bottom left) was originally used by Southern California Edison but was acquired by DWP in 1922, when Edison sold its distribution system to the City. The other two were purpose-built as DWP distributing stations. Each was also evaluated as an excellent example of a particular architectural style; the station that was originally used by Southern California Edison was designed by master architect John Parkinson.



**Name:** DWP Distributing Station No. 34

**Address:** 1027 S. Santee St.

**Date:** 1925



**Name:** DWP Distributing Station No. 9

**Address:** 926 S. Francisco St.

**Date:** 1923



**Name:** DWP Distributing Station No. 12

**Address:** 120 E. Fourth St.

**Architect:** John Parkinson

**Date:** 1903



## **Context: Public and Private Institutional Development, 1850-1980**

### **Sub-Context: Government Infrastructure and Services, 1850-1980**

#### **Theme: Municipal Fire Stations, 1900-1980**

#### **Theme: Federal Infrastructure and Services, 1850-1980**

Located within the Survey Area are several significant examples of government infrastructure and services that facilitated and sustained the community's development. Resources identified under these Context/Theme combinations are associated with different periods of the area's development history. Notable examples include facilities that were built to accommodate population growth in and around the Downtown area including two municipal fire station (top row), and a rare example of a pre-World War II post office facility (bottom left) that is one of few examples from this era in the City. The post office is a vestige of residential development that once prevailed in this area of Downtown but was incrementally supplanted by industry.



**Name:** Fire Station No. 9

**Address:** 430 E. Seventh St.

**Architect:** Orr, Strange and Inslee

**Date:** 1959



**Name:** Fire Station No. 10

**Address:** 1355 S. Olive St.

**Architect:** Orr, Strange and Inslee

**Date:** 1951



**Name:** U.S. Post Office, Market Station Branch

**Address:** 1122 E. Seventh St.

**Architect:** John M. Cooper

**Date:** 1940

## **Context: Public and Private Institutional Development, 1850-1980**

### **Sub-Context: Religion and Spirituality, 1850-1980**

#### **Theme: Religion and Spirituality and Ethnic/Cultural Associations, 1850-1980**

For many years, housing restrictions and other forms of institutionalized segregation relegated minorities to the peripheral areas around the central business district where vibrant ethnic enclaves emerged. Within these enclaves, churches not only functioned as places of worship but also served as focal points of community life. This Context/Theme combination was used to evaluate three churches associated with the various ethnic enclaves that developed around Downtown. Two of these churches (top row) are located in Little Tokyo and have longstanding associations with the Japanese American community; the third (bottom left) is a rare example of an extant church associated with Market Chinatown, a small Chinese American enclave that developed adjacent to one of the City's largest wholesale produce markets.



**Name:** Koyasan Buddhist Temple

**Address:** 342 E. First St.

**Architect:** Mieki Hayano

**Date:** 1940



**Name:** Higashi Honganji Buddhist Temple

**Address:** 505 E. Third St.

**Architect:** Kajima and Associates

**Date:** 1976



**Name:** Chinese Congregational Church

**Address:** 734 E. Ninth Pl.

**Architect:** Quintin and Westberg

**Date:** 1924



## **Context: Public and Private Institutional Development, 1850-1980**

### **Sub-Context: Cultural Development and Institutions, 1850-1980**

#### **Theme: Religious Property Types, 1850-1980**

Historically, small churches abounded in Downtown Los Angeles at a time when much of the area around the central business district was developed with residential neighborhoods. Over time nearly all vestiges of residential development patterns, including churches, have been eliminated as land in Downtown was increasingly turned over for commercial and industrial use. However, the Survey Area includes two examples of religious buildings that were constructed in the early decades of the twentieth century and were attended by those who lived nearby. Both were evaluated using this Context/Theme combination. Included is a 1920s Methodist church (left) in what is now known as Skid Row, and a 1930s Christian Science Reading Room (right) that was associated with an adjacent church building that has since been demolished. Both are rare remaining examples of religious buildings in this area of the city.



**Name:** First Free Methodist Church

**Address:** 606 E. Sixth St.

**Architect:** F.A. Brown

**Date:** 1920



**Name:** Third Church of Christ, Scientist Reading Room

**Address:** 730 S. Hope St.

**Architect:** G.A. Howard

**Date:** 1937

## Context: Public and Private Institutional Development, 1850-1980

### Sub-Context: Military Institutions and Activities, 1850-1980

#### Theme: Air Raid Sirens and Civil Defense, 1939-1960

During World War II, hundreds of air raid sirens were installed throughout Los Angeles for the purpose of civil defense and were designed to provide audible warnings of impending air assaults. The system was shut off at the end of World War II, but was reactivated in the 1950s following the onset of the Cold War. Twelve examples of air raid sirens are located in the Central City area and were evaluated under this Context/Theme combination. Two of the four federal air raid siren models – “wire spool” and “flattened birdhouse” – are represented in the CPA; all of the air raid sirens identified are installed on freestanding support poles.



**Name:** Air Raid Siren No. 93 (Wire Spool)  
**Location:** Olive St., between First St. and Second St.  
**Date:** circa 1940



**Name:** Air Raid Siren No. 9 (Wire Spool)  
**Location:** Main St. and Winston St.  
**Date:** circa 1940



**Name:** Air Raid Siren No. 8 (Wire Spool)  
**Location:** Spring St. and Temple St.  
**Date:** circa 1940



**Name:** Air Raid Siren No. 189 (Flattened Birdhouse)  
**Location:** Eighth St. and McGarry Ave.  
**Date:** circa 1940



## **Context: Public and Private Institutional Development, 1850-1980**

### **Sub-Context: Government Infrastructure and Services, 1850-1980**

#### **Theme: Public Works, 1900-1980**

#### **Sub-Theme: Street Lights and the Bureau of Street Lighting, 1900-1980**

Many of the streetlights in Downtown Los Angeles date to the early decades of the twentieth century and are notable for their ornamental attributes. Streetlights of this vintage can be found throughout Downtown, particularly along corridors in the central business district. This Context/Theme combination was used to evaluate intact, cohesive concentrations of streetlights in the Survey Area. Many feature a double-lantern design (top row) and were officially known as the "UM-1920" variety. Hundreds of UM-1920 streetlights were installed on many Downtown streets in the mid-1920s. Those on North Spring Street (bottom left) feature extended support poles that historically supported wires that supplied power to streetcars, and others, such as those on Olympic Boulevard (bottom right), were custom-designed for a particular street.



**Name:** Fourth Street Streetlights

**Location:** Fourth St., between Hill St. and Main St.

**Date:** c. 1925



**Name:** Sixth Street Streetlights

**Location:** Sixth St., between Flower St. and Main St.

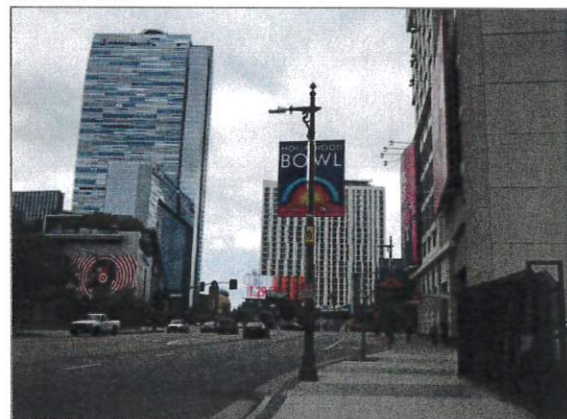
**Date:** c. 1925



**Name:** North Spring Street Streetlights

**Location:** Spring St. between First St. and Chavez Ave.

**Date:** c. 1925



**Name:** Olympic Boulevard Streetlights

**Location:** Olympic Bl., between SR-110 and Flower St.

**Date:** c. 1930



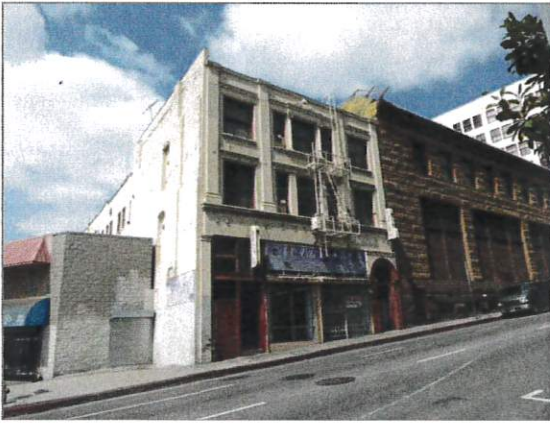
## **Context: Public and Private Institutional Development, 1850-1980**

### **Sub-Context: Civil Rights Movement – Ethnic and Gender Equality, 1942-1980**

#### **Theme: Gay Civil Rights Movement, 1942-1965**

#### **Sub-Theme: Important Events and Institutions in the Gay Civil Rights Movement, 1942-1965**

Downtown Los Angeles is home to some of the oldest known resources associated with the city's lesbian, gay, bisexual, and transgender (LGBT) community. Significant LGBT resources identified in the survey include a Turkish bathhouse from 1906 (top left) that remains in operation and is notable as the oldest operating gay bathhouse in Los Angeles; the Merced Theatre (top right), where masked balls at the turn of the twentieth century provided gays and lesbians with a safe space to engage in nonconforming sexual behavior; and buildings that were once the site of influential gay bars from the 1940s and '50s (bottom row). While these bars are no longer in business, the buildings in which they were housed remain extant.



**Name:** Palace Turkish Baths/Hotel Venice

**Address:** 132 E. Fourth St.

**Architect:** Fred R. Dorn

**Date:** 1906



**Name:** Merced Theatre

**Address:** 420 N. Main St.

**Architect:** Ezra P. Kysor

**Date:** 1870



**Name:** The Crown Jewel (site of)

**Address:** 425 W. Eighth St.

**Date:** 1910



**Name:** Gayaway Café (site of)

**Address:** 514 S. Main St.

**Date:** 1906



## Context: Architecture and Engineering, 1850-1980

Theme: Late 19<sup>th</sup> and Early 20<sup>th</sup> Century Architecture, 1865-1950

Sub-Theme: Beaux Arts Classicism, 1895-1930

Many of the early twentieth century buildings in the Survey Area are designed in the formal and ornamented Beaux Arts style. Taking its name from the *École de Beaux Arts* in Paris, the style was commonly applied to commercial and civic buildings from this era and projected grandeur, symmetry, and order. Its popularity coincided with the rise of the City Beautiful Movement, a city planning paradigm that aimed to improve urban settings through monumental architecture and civic beautification. This Context/Theme combination was used to evaluate commercial and institutional buildings that are excellent examples of the Beaux Arts style. Common features include tripartite vertical organization with a clearly delineated base, shaft, and capital; heavy cornices; balanced facades; and formally-scaled architectural details that draw upon Classicism.



**Name:** Marsh Strong Building

**Address:** 112 W. Ninth St.

**Architect:** Fred R. Dorn

**Date:** 1913



**Name:** Los Angeles Railway Building

**Address:** 1060 S. Broadway

**Architect:** Noerenberg and Johnson

**Date:** 1922



**Name:** Builders Exchange Building

**Address:** 656 S. Los Angeles St.

**Architect:** Walker and Eisen

**Date:** 1925



**Name:** Lane Mortgage Building

**Address:** 200 W. Eighth St.

**Architect:** Loy L. Smith

**Date:** 1922



## Context: Architecture and Engineering, 1850-1980

### Theme: Mediterranean and Indigenous Revival Architecture, 1887-1952

#### Sub-Theme: Renaissance Revival, 1895-1935

Similar in composition and appearance to the Beaux Arts style, the Renaissance Revival style was also a common choice for early twentieth century commercial and civic buildings. Buildings designed in the Renaissance Revival style are also characterized by their attention to symmetry, order, and incorporation of Classical style details; however, they are distinguished from their Beaux Arts counterparts by details such as arches, engaged columns, voussiors, and other decorative elements that more deliberately reference Italian Renaissance motifs. This Context/Theme combination was used to evaluate buildings that are excellent examples of the Renaissance Revival style. Almost all were designed by noted architects.



**Name:** Pacific Finance Building

**Address:** 510 W. Sixth St.

**Architect:** Dodd and Richards

**Date:** 1921



**Name:** Sun Drug Building

**Address:** 706 S. Hill St.

**Architect:** Curlett and Beelman

**Date:** 1922



**Name:** Ritz Hotel/Milner Hotel

**Address:** 813 S. Flower St.

**Architect:** Curlett and Beelman

**Date:** 1923



**Name:** Western Pacific Building

**Address:** 1031 S. Broadway

**Architect:** Walker and Eisen

**Date:** 1925



## Context: Architecture and Engineering, 1850-1980

Theme: Period Revival, 1919-1950

Sub-Theme: Late Gothic Revival, 1919-1939

Rooted in the architecture of Medieval Britain and France, the Late Gothic Revival style became popular in Los Angeles in the early twentieth century. The style's visual references to old-world architecture rendered it a popular choice for ecclesiastical and other institutional buildings. This Context/Theme combination was used to evaluate buildings in the Survey Area that are excellent examples of the Late Gothic Revival style. Of note were several industrial loft buildings that were designed in the 1920s by architect W. Douglas Lee and builder Florence Casler, whose collaboration produced some of the city's most architecturally distinguished industrial buildings. Casler is notable for breaking down gender barriers in the male-dominated building industry.



**Name:** Elias-Katz Shoe Factory

**Address:** 442 S. San Pedro St.

**Architect:** W. Douglas Lee, Florence C. Casler (builder)

**Date:** 1927



**Name:** Allied Crafts Building

**Address:** 401 E. Pico Blvd.

**Architect:** W. Douglas Lee, Florence C. Casler (builder)

**Date:** 1926



**Name:** Graphic Arts Building

**Address:** 415 E. Pico Blvd.

**Architect:** W. Douglas Lee, Florence C. Casler (builder)

**Date:** 1924



**Name:** Bendix Building

**Address:** 1206 S. Maple Ave.

**Architect:** W. Douglas Lee, Florence C. Casler (builder)

**Date:** 1929



## Context: Architecture and Engineering, 1850-1980

### Sub-Context: L.A. Modernism, 1919-1980

#### Theme: Art Deco, 1926-1939

Downtown Los Angeles features a relatively large collection of buildings designed in the Art Deco style. Art Deco, which made its official debut in Paris in 1925, reflected the optimism of the 1920s by introducing an aesthetic defined by its verticality and sharp, geometric forms. The style was more forward-reaching than the Beaux Arts and Period Revival styles, which looked to past architectural traditions for inspiration. The onset of the Great Depression meant that the opulent Art Deco style was relatively short-lived. This Context/Theme combination was used to evaluate excellent examples of the Art Deco style. The style was adapted to a variety of property types including commercial (top row), institutional (bottom left), and industrial (bottom right) buildings.



**Name:** Harris and Frank Building

**Address:** 635 S. Hill St.

**Architect:** Curlett and Beelman

**Date:** 1925



**Name:** Security Title Insurance Building

**Address:** 540 W. Sixth St.

**Architect:** Walker and Eisen

**Date:** 1929



**Name:** Southern California Telephone Co. Building

**Address:** 716 S. Olive St.

**Architect:** Morgan and Walls

**Date:** 1908; circa 1933 (remodel)



**Name:** W.M. Gottschalk and Son

**Address:** 1012 S. Santee St.

**Architect:** Russell Collins

**Date:** 1929



## **Context: Architecture and Engineering, 1850-1980**

### **Sub-Context: L.A. Modernism, 1919-1980**

#### **Theme: Corporate International, 1946-1976**

Areas of Downtown Los Angeles that experienced substantial redevelopment after World War II feature many buildings designed in the Corporate International style. The style, which emerged as an adaption of International style architecture that had helped propel Modernism into the public eye, is characterized by its rejection of historicist idioms and embrace of an aesthetic that incorporated modern materials, forms, and technologies. This Context/Theme combination was used to evaluate excellent, iconic examples of Corporate International style office towers. These buildings clearly convey the philosophy underpinning the International style as applied to a dense urban setting. Several were also evaluated under the Commercial Development context for their association with patterns of corporate development and identity after World War II.



**Name:** Union Bank Plaza  
**Address:** 445 S. Figueroa St.  
**Architect:** A.C. Martin and Associates  
**Date:** 1966



**Name:** United California Bank Building/Aon Center  
**Address:** 707 W. Wilshire Blvd.  
**Architect:** Charles Luckman Associates  
**Date:** 1973



**Name:** Crocker-Citizens Plaza  
**Address:** 611 W. Sixth St.  
**Architect:** William L. Pereira and Associates  
**Date:** 1967



**Name:** Security Pacific Plaza/Bank of America Plaza  
**Address:** 333 S. Hope St.  
**Architect:** A.C. Martin and Associates  
**Date:** 1974

## **Context: Architecture and Engineering, 1850-1980**

### **Sub-Context: L.A. Modernism, 1919-1980**

#### **Theme: Late Modernism, 1966-1980**

Many of the more contemporary buildings in Downtown Los Angeles can be classified as “Late Modern,” a broad term that is used to describe the evolution of Modernism from about the mid-1960s onward. This Context/Theme combination was used to evaluate properties that are excellent examples of various iterations of Late Modernism. Included are several buildings that feature sculptural qualities and glass skins (top row); heavy, concrete buildings that are characteristic of Brutalism (bottom left); and an iconic performing arts venue that exhibits the fragmentation and freedom of form associated with the Deconstructivist movement (bottom right).



**Name:** Bonaventure Hotel

**Address:** 404 S. Figueroa St.

**Architect:** John Portman and Associates

**Date:** 1976



**Name:** Pacific Financial Center

**Address:** 808 W. Sixth St.

**Architect:** William L. Pereira and Associates

**Date:** 1973

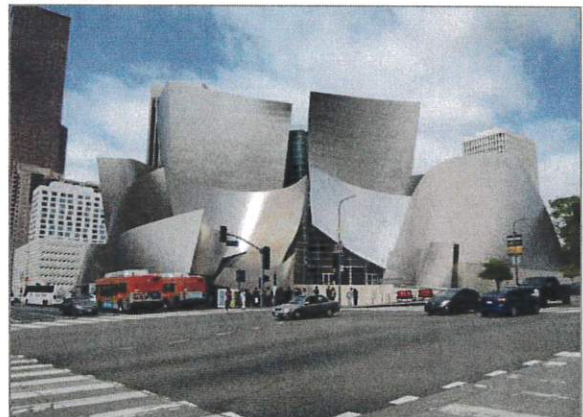


**Name:** Japanese American Cultural & Comm. Center

**Address:** 244 S. San Pedro St.

**Architect:** Kazumi Adachi, et al.

**Date:** 1978



**Name:** Walt Disney Concert Hall

**Address:** 111 S. Grand Ave.

**Architect:** Frank O. Gehry

**Date:** 2003



## **Context: Entertainment Industry, 1908-1980**

### **Theme: Commercial Properties Associated with the Entertainment Industry, 1909-1980**

While the epicenter of Los Angeles' entertainment industry is in the Hollywood area, some entertainment-related uses were also located Downtown. This Context/Theme combination was used to evaluate four examples of commercial properties that are associated with the entertainment industry. Examples include a motion picture theater (top left) that was built in 1919 for the Pantages circuit and was later occupied by Warner Bros.; two smaller motion picture theaters (top right and bottom left) located on Eighth and Main streets, respectively; and a commercial building that served as a "prop shop" for the Joseph Basch Company, which rented period furniture and other items to motion picture studios. The Pantages Theater was also evaluated under the Architecture context as an excellent example of the Beaux Arts style.



**Name:** Pantages Theatre/Warner Bros. Theatre  
**Address:** 411 W. Seventh St.  
**Architect:** B. Marcus Priteca  
**Date:** 1919



**Name:** Olympic Theatre/Bard's 8<sup>th</sup> Street Theatre  
**Address:** 313 W. Eighth St.  
**Architect:** Lewis A. Smith  
**Date:** 1927



**Name:** Regent Theatre  
**Address:** 448 S. Main St.  
**Architect:** A. Lawrence Valk; Stiles Clements (remodel)  
**Date:** 1914



**Name:** Joseph Basch Company Showroom  
**Address:** 1031 S. Hill St.  
**Architect:** Walker and Eisen  
**Date:** 1920

## **Context: Industrial Development, 1850-1980**

**Theme: Agricultural Roots, 1850-1965**

**Sub-Theme: From Farm to Market, 1900-1960**

Agriculture was one of the first linchpins of Los Angeles' economy and accounted for much of its early industrial development. Industrial properties that played an important supporting role in the distribution of agricultural goods tended to concentrate near the railroad terminals along Alameda Street, to the east of the central business district. This Context/Theme combination was used to evaluate examples of early twentieth century industrial buildings that convey early patterns of agriculture-oriented industrial development in the area. Included is a cold storage warehouse from 1905 (left), which was built to store produce and other raw food items; and a produce brokerage building (right), also from 1905, which housed office and warehouse space and was an important administration center within the local produce trade. The produce brokerage building was also evaluated for its association with the Chinese American community; a portion of the building was occupied by the Market and Produce Bank, which catered to Chinese American produce merchants and was one of few banks that accommodated people of Chinese descent in an era when Asian Americans were confronted by rampant discrimination.



**Name:** Los Angeles Ice and Cold Storage Company  
**Address:** 715 E. Fourth St.  
**Architect:** Eisen and Wyman  
**Date:** 1905



**Name:** Produce Exchange Building  
**Address:** 333 S. Central Ave.  
**Date:** 1905



## **Context: Industrial Development, 1850-1980**

### **Sub-Context: Manufacturing for the Masses, 1883-1980**

#### **Theme: Garments and Textiles, 1896-1980**

Since the early twentieth century, Los Angeles has been one the nation's foremost producers of garment and textiles, surpassed only by New York City in terms of volume. Garment factories concentrated to the south and east of the central business district and tended to occupy tall, industrial loft buildings that supported the industry's working environmental and organizational structure. Several excellent, intact examples of garment factories were evaluated using this Context/Theme combination. Most are vernacular buildings that lack articulation, but others, including the Cooper Building (bottom right), are architecturally distinguished and were also evaluated as excellent examples of their respective architectural style.



**Name:** McComas Building  
**Address:** 120 E. Eighth St.  
**Architect:** John M. Cooper  
**Date:** 1923



**Description:** Brownstein-Louis Company  
**Address:** 1214 S. Stanford Ave.  
**Builder:** John M. Cooper  
**Date:** 1930



**Name:** Calo Building  
**Address:** 443 S. San Pedro St.  
**Architect:** W. Douglas Lee  
**Date:** 1923



**Name:** Cooper Building  
**Address:** 860 S. Los Angeles St.  
**Architect:** Curlett and Beelman  
**Date:** 1924



## **Context: Industrial Development, 1850-1980**

### **Theme: Industrial Design and Engineering, 1887-1965**

This Context/Theme combination was used to evaluate properties that are excellent examples of a particular variety of industrial design. Industrial lofts and daylight factories are the two most common industrial property types in Downtown Los Angeles. Industrial lofts (top row) are characterized by their vertical orientation, which was an attempt to maximize the amount of usable floor space on relatively compact urban lots. Daylight factories (bottom row) feature expansive bands of industrial sash windows, distinctive roof forms, and other innovative design features that aim to maximize the amount of natural light that enters into the building. Most buildings evaluated under this Context/Theme were designed by master architects, who were known for other types of projects but also incorporated industrial design into their repertoire.



**Name:** Continental Pacific Building

**Address:** 1013 S. Los Angeles St.

**Architect:** B. Marcus Priteca

**Date:** 1925



**Name:** Walter Building

**Address:** 808 S. Wall St.

**Architect:** Russell and Ellison

**Date:** 1924



**Name:** Western Electric Company

**Address:** 1757 E. Olympic Blvd.

**Architect:** Morgan, Walls and Clements

**Date:** 1925



**Name:** Los Angeles Rubber Stamp Company

**Address:** 1500 S. Los Angeles St.

**Architect:** Walker and Eisen

**Date:** 1924



## **Context: Other Context, 1850-1980**

### **Theme: Events or Series of Events, 1850-1980**

This Context/Theme was used to evaluate industrial properties that are significant for their association with Los Angeles' labor history. In 1901, the predominantly-female workforce of the Excelsior Steam Laundry (left) participated in a laundry workers' strike that called attention to poor working conditions in the city's seven major laundry companies. Strikers called for a closed shop agreement, a ten-hour work day, and equal pay for women and men. The laundry strike set the stage for future labor disputes that would roil Los Angeles in subsequent years. The second resource associated with labor (bottom right) historically served as the headquarters of the International Ladies Garment Workers' Union. In the 1930s, dressmakers belonging to the union went on strike, which significantly influenced the treatment of women employed in the garment and textile industries. This building was the location at which union members were registered, organized into shop groups, and issued identification cards which provided them with access to meals, groceries, and a weekly cash allowance.



**Name:** Excelsior Steam Laundry

**Address:** 424 S. Los Angeles St.

**Date:** 1893



**Name:** International Ladies Garment Workers' Union

**Address:** 1108 S. Los Angeles St.

**Date:** 1923

## Context: Other Context, 1850-1980

### Theme: Events or Series of Events, 1850-1980

This Context/Theme combination was also used to evaluate the Los Angeles Civic Center Historic District. Developed between 1925 and 1972, the monumental civic buildings and associated site features comprising the district convey patterns of development associated with a Civic Center Master Plan for Los Angeles that was conceived in 1927 and amended in 1947. Aside from the earliest buildings in the civic center, buildings within the district are generally designed in the Corporate International style. The district was previously identified as eligible for the National Register and California Register through the Section 106 and California Environmental Quality Act (CEQA) review processes, respectively. The findings of this previous determination were recorded as part of SurveyLA.



**Description:** Civic Center Historic District Contributor

**Address:** (Hall of Justice)

**Architect:** Allied Architects Association

**Date:** 1925



**Description:** Civic Center Historic District Contributor

**Address:** 150 N. Los Angeles St.(Parker Center)

**Architect:** Welton Becket and Associates

**Date:** 1955



**Description:** Civic Center Historic District Contributor

**Address:** 135 N Grand Ave (Dorothy Chandler Pavilion)

**Architect:** Welton Becket and Associates



**Description:** Civic Center Historic District Contributor

**Address:** 320 W. Temple St. (Hall of Records)

**Architect:** Neutra and Alexander



Date: 1964

Date: 1962

**Context: Other Context, 1850-1980**

**Theme: Events or Series of Events, 1850-1980**

This Context/Theme was also used to evaluate two cohesive examples of commercial districts dating to this period, one on Seventh Street and the other on Hill Street. The central business district of Los Angeles took shape between the turn of the twentieth century and the early 1930s, when many new commercial buildings were constructed along Downtown's major streets. These arteries evolved into bustling commercial corridors that were flanked by myriad commercial uses including department stores, retail shops, theaters, banks and financial institutions, eateries, and offices. Each district was also identified as an excellent concentration of early twentieth century – and particularly Beaux Arts – commercial architecture. Since these districts contain some of the best examples of commercial architecture in Los Angeles, many contributing buildings were also evaluated as individually eligible resources. Several are already listed in the National Register, California Register, and/or as City Historic-Cultural Monuments.



**District:** Hill Street Commercial Historic District  
**Period of Significance:** 1906-1934



**District:** Seventh Street Commercial Historic District  
**Period of Significance:** 1906-1928



**Description:** Hill Street District Contributor  
**Address:** 638 S. Hill St. (Bullocks Annex)  
**Date:** 1928



**Description:** Hill Street District Contributor  
**Address:** 701 S. Hill St. (Foreman and Clark Building)  
**Date:** 1928





**Description:** Seventh Street District Contributor  
**Address:** 700 S. Grand Ave. (Brockman Building)  
**Date:** 1912



**Description:** Seventh Street District Contributor  
**Address:** 515 W. Seventh St. (Brock and Company)  
**Date:** 1922



**Description:** Seventh Street District Contributor  
**Address:** 431 W. Seventh St. (L.A. Athletic Club)  
**Date:** 1911



**Description:** Seventh Street District Contributor  
**Address:** 505 W. Seventh St. (Bank of Italy)  
**Date:** 1923



**Description:** Seventh Street District Contributor  
**Address:** 215 W. Seventh St. (Union Oil Building)  
**Date:** 1911



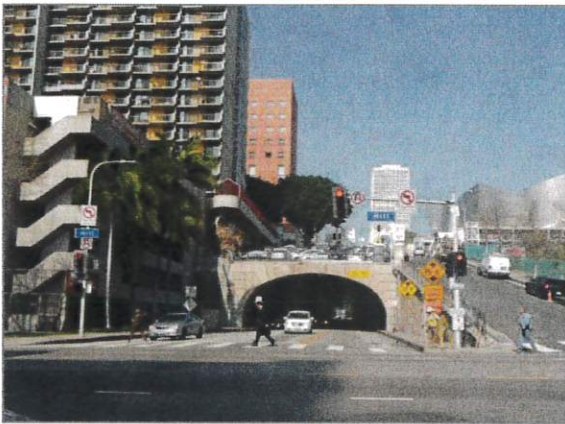
**Description:** Seventh Street District Contributor  
**Address:** 701 S. Broadway (State Theatre)  
**Date:** 1924



## Context: Other Context, 1850-1980

### Theme: Design/Construction, 1850-1980

This Context/Theme was used to evaluate examples of infrastructure in the Survey Area that are significant for their physical design. Examples include a concrete tunnel (top left) that was constructed in the 1920s to alleviate congestion in the central business district, and a network of elevated pedestrian corridors, or “pedways,” (bottom row), which were part of a visionary urban design scheme for Bunker Hill and provide direct pedestrian links between key buildings and sites in the area. The pedway system was named for Calvin S. Hamilton, who served as the city planning director of Los Angeles and oversaw the system’s initial construction.



**Name:** Second Street Tunnel

**Location:** Second St., between Hill St. and Figueroa St.

**Date:** 1924



**Name:** Calvin S. Hamilton Pedway

**Location:** Bunker Hill

**Date:** 1974

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# LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

[www.planning.lacity.org](http://www.planning.lacity.org)

## LETTER OF DETERMINATION

MAILING DATE: **SEP 26 2023**

**Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR**

Council District: 14 – de León

CEQA: ENV-2017-506-EIR (SCH. No. 2019050010)

Plan Area: Central City

Related Cases: VTT-74864-CN-1A; ZA-2021-7053-ZAI-1A

**Project Site:** 754 South Hope Street; 609 – 625 West 8th Street

**Applicant:** MFA 8th Grand and Hope LLC  
Representative: Edgar Khalatian, Mayer Brown LLP

At its meeting of **July 13, 2023**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following Project:

Construction of a 50-story, mixed-use development comprised of 580 residential dwelling units and up to 7,499 square feet of ground floor commercial uses on a 34,679 square-foot site. The Project would provide vehicular parking in three subterranean levels and eight above-grade levels. The building would have a maximum height of 592 feet, and a Floor Area Ratio (FAR) of 9.25:1 (554,927 square feet) and would require the export of approximately 89,750 cubic yards of soil. To accommodate the Project, an existing surface parking lot and four-story parking structure would be demolished.

1. **Found**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the Project was assessed in the previously certified Environmental Impact Report No. ENV-2017-506-EIR, certified on September 26, 2023; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project;
2. **Recommended** that the City Council **approve**, pursuant Section 14.5.6 A of the Los Angeles Municipal Code (LAMC), a Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area, for the transfer of up to 346,853 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to the Project Site (Receiver Site), thereby permitting a maximum 9.25:1 FAR in lieu of the otherwise permitted 6:1 FAR;
3. **Requested** that within six months of the receipt of the Public Benefits Payment by the Public Benefit Trust Fund, the Chief Legislative Analyst convene the Public Benefit Trust Fund Committee, pursuant to LAMC Section 14.5.12;
4. **Dismissed** as not necessary, pursuant to LAMC Section 12.27, a Zone Variance to allow 60 percent of the required residential parking spaces as compact spaces, and to allow the parking of compact spaces in a tandem configuration;
5. **Approved**, pursuant to LAMC Section 12.27, a Zone Variance to allow relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction;
6. **Approved**, pursuant to LAMC Section 12.27, a Zone Variance to allow relief to allow reduced drive aisle widths of 24 feet in lieu of the required drive aisle width;



7. **Approved**, pursuant LAMC Section 11.5.7 E, a Specific Plan Project Permit Adjustment for a Director's Determination for an Alternative Design to allow a deviation from the Ground Floor Treatment regulations in Section 4 of the Downtown Design Guide;
8. **Approved**, pursuant LAMC Section 11.5.7 E, a Specific Plan Project Permit Adjustment to allow a deviation from Section 5 of the Downtown Design Guide to allow building and balcony projections up to nine feet and 25 feet into the sidewalk easements along Hope Street and Grand Avenue respectively, and allow projections to begin at an elevation of 25 feet above grade along Hope Street and Grand Avenue;
9. **Approved**, pursuant to LAMC Section 12.21 G.3, a Director's Decision to allow 79 trees to be planted on-site in lieu of the otherwise required 145 trees, and to allow an in-lieu fee to be paid for the remaining 66 required on-site trees; and
10. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for a development project which creates an increase of more than 50 dwelling units;
11. **Adopted** the attached Conditions of Approval; and
12. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Noonan  
Second: Lawshe  
Ayes: Cabildo, Choe, Mack, Millman, Zamora  
Recuse: Gold  
Absent: Leung

**Vote: 7 – 0 – 1**



Cecilia Lamas, Commission Executive Assistant II  
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

**Effective Date/Appeals:** The decision of the Los Angeles City Planning Commission related to Transfer of Floor Area Rights (TFAR) is appealable to City Council by the Applicant if disapproved in whole or in part. The decision of the Los Angeles City Planning Commission related to the remaining approvals is appealable to City Council within 15 days after the mailing date of this determination letter. Any appeal not filed within the 15-day period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles, CA 90012; or 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401.

**FINAL APPEAL DATE: OCT 11 2023**

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final

pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Conditions of Approval, Findings, Appeal Filing Procedures

c: Milena Zasadzien, Principal City Planner  
Alan Como, Senior City Planner  
Polonia Majas, City Planning Associate



## CONDITIONS OF APPROVAL

### Entitlement Conditions

1. **Site Development.** The use and development of the property shall be in substantial conformance with the plans submitted with the application, marked Exhibit A, stamp-dated, July 13, 2023, except as may be revised by this action. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning, with each change identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization. The project shall be constructed in a manner consistent with the following project description:
  - a. The Project shall be limited to 580 dwelling units, and 7,499 square feet of ground floor commercial, retail and restaurant uses, totaling up to 554,927 square feet of floor area.
2. **Development Service Center.** Prior to sign-off on building permits by the Department of City Planning's Development Services Center for the project, the Department of City Planning's Major Projects Section shall confirm, via signature, that the project's building plans substantially conform to the conceptual plans stamped as Exhibit "A", as approved by the City Planning Commission.

Note to Development Services Center: The plans presented to, and approved by, the City Planning Commission (CPC) included specific architectural details that were significant to the approval of the project. Plans submitted at plan check for condition clearance shall include a signature and date from Major Projects Section planning staff to ensure plans are consistent with those presented at CPC.

### 3. Transfer of Floor Area Rights

- a. **Floor Area.** The Development shall not exceed a maximum Floor Area Ratio (FAR) of 9.25:1 and a total floor area of 554,927 square feet. The Transfer Payment and Public Benefit Payment shall be pro-rated to the amount of TFAR being acquired in the event the maximum amount of TFAR is not required. The buildable area of a Transit Area Mixed Use Project used to calculate the base floor area shall be 34,679 square feet with a 6:1 FAR. Changes to the Project that result in a 20 percent decrease in floor area, or more, shall require new entitlements. The Department of City Planning reserves the right to confirm the accuracy of the requested floor area, and to verify the calculation of the Transfer Payment and Public Benefit Payment at any time prior to the issuance of the building permit, or 24 months after the final approval of the Transfer and the expiration of any appeals or appeal period, or any extensions permitted by the Director in accordance with Section 14.5.11 of the LAMC.
- b. **TFAR Transfer Payment.** The Project is subject to and shall pay a TFAR Transfer Payment in conformance with Section 14.5.6 through 14.5.12 of the Code. Such payment shall be based on the actual amount of floor area transferred to the Project site.
  - i. The total amount of floor area authorized to be transferred from the Los Angeles Convention Center by this action shall not exceed 346,853 square feet. The total floor area of the Project Site (Receiver Site) shall not exceed 554,927 square feet.
  - ii. The Applicant shall provide a TFAR Transfer Payment consistent with LAMC Section 14.5.10 in the amount of \$5 per square foot, or \$1,734,265.00 for the

transfer of 346,853 square feet from the Los Angeles Convention Center located at 1201 South Figueroa Street (Donor Site) to the Project Site (Receiver Site).

- c. **Public Benefit Payment.** The Project is subject to and shall pay a Public Benefit Payment in conformance with Section 14.5.6 through 14.5.12 of the Code.

- i. The Applicant shall provide a Public Benefit Payment consistent with LAMC Section 14.5.9 in the amount of \$9,828,451.84 provided that at least 50 percent (or \$4,914,225.92) of the Public Benefit Payment consist of cash payment by the Applicant to the Public Benefit Trust Fund. Direct provision payments shall be paid directly to the recipients and not to the City of Los Angeles. Proof shall be provided in the form of a cleared check or bank statement and a letter signed by the Executive Director of each organization. Consistent with the TFAR Ordinance, the Project shall provide 50 percent (or \$4,914,225.92) of the Public Benefit Payment by directly providing the following public benefits:

1. A payment to the Los Angeles City Council District 14's Public Benefits Trust Fund for Affordable Housing in the amount of \$4,914,225.92 (100 percent). The funds shall be utilized for construction and operation of affordable housing developments.

- ii. At the time of issuance of the Certificate of Occupancy for the Project, the Applicant shall provide an update to the file from each recipient of direct provisions detailing how the money has been spent thus far.

- iii. The Applicant shall pay the required Public Benefit Payment, less the cost of the Direct Provision of Public Benefits, in cash to the Public Benefit Trust Fund, pursuant to the terms of Transfer of Floor Area Rights Ordinance No. 181,574, Article 4.5 of the LAMC. The Public Benefit Payment proof of cash payment and direct provision of public benefits is required upon the earliest occurrence of either:

1. The issuance of the building permit for the Project; or
2. Twenty-four months after the final approval of the Transfer and the expiration of any appeals or appeal period; should the Applicant not make the required payments within the specified time, the subject approval shall expire, unless extended by the Director in writing.

### **Zone Variance Conditions**

4. **Reduced Drive Aisle Width.** Vehicular drive aisles shall be allowed at a minimum width of 24 feet.
5. **Parking Stall Design.** Relief shall be provided from the requirement to provide the otherwise required additional 10-inch clear space for parking stall when adjoined on their longer dimension by an obstruction.

### **Specific Plan Adjustment Conditions**

6. **Ground Floor Treatment.** The Project shall provide a minimum of 47 percent street frontage along Hope Street, 35 percent street frontage along Grand Avenue, and 67 percent frontage along 8<sup>th</sup> Street to accommodate commercial/active residential uses.



7. **Sidewalk Easement Projections.** The following building and balcony projections shall be permitted in the sidewalk easement, consistent with Exhibit A, stamp dated July 13, 2023:
- a. Grand Avenue. The building shall be allowed to project up to 19 feet into the required sidewalk easement beginning at a height of 25 feet above the sidewalk.
  - b. Hope Street. The building shall be allowed to project up to 9 feet into the required sidewalk easement beginning at a height of 25 feet above the sidewalk.

#### **Director's Decision Conditions**

8. **Landscaping.** Prior to the issuance of a building permit, a landscape and irrigation plan shall be submitted to the Department of City Planning for approval. The landscape plan shall be in substantial conformance with the landscape plan stamped Exhibit A, dated July 13, 2023.
9. **Required Trees.** The Project shall plant 79 trees on-site and shall pay an in-lieu fee for the remaining 66 required on-site trees pursuant to LAMC Section 62.177(d).

#### **Site Plan Review Conditions**

10. **Common and Private Open Space.** Common and Private Open Space shall conform to the requirements of the LAMC and shall not be enclosed or be converted into habitable space.
11. **Tree Wells.** The minimum depth of tree wells and planters on the rooftop, any above grade open space, and above a subterranean structure shall be as follows:
- a. Minimum depth for trees shall be 42 inches.
  - b. Minimum depth for shrubs shall be 30 inches.
  - c. Minimum depth for herbaceous plantings and ground cover shall be 18 inches.
  - d. Minimum depth for an extensive green roof shall be 3 inches.

The minimum amount of soil volume for tree wells on the rooftop or any above grade open spaces shall be based on the size of the tree at maturity:

- a. 220 cubic feet for a tree 15 – 19 feet tall at maturity.
  - b. 400 cubic feet for a tree 20 - 24 feet tall at maturity.
  - c. 620 cubic feet for a medium tree or 25 – 29 feet tall at maturity.
  - d. 900 cubic feet for a large tree or 30 - 34 feet tall at maturity.
12. **Tree Maintenance.** All newly planted trees must be appropriately sized, staked and tied; provided with a watering moat; and shall be properly watered and maintained.
13. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.
14. **Trash and Recycling.**
- a. All trash collection and storage areas shall be located on-site and shall not be visible from the public right-of-way.
  - b. Trash receptacles shall be stored in a fully enclosed building or structure.

c. Trash/recycling containers shall be locked when not in use.

15. **Mechanical Equipment.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public right-of-way. All screening shall be setback at least five feet from the edge of the building.
16. **Construction Signage.** There shall be no off-site commercial signage on construction fencing during construction.

### **Environmental Conditions**

17. **Implementation.** The Mitigation Monitoring Program (MMP), attached as “Exhibit B” and part of the case file, shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Project Design Features (PDF) and Mitigation Measure (MM) and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.
18. **Construction Monitor.** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant’s compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant’s Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

19. **Substantial Conformance and Modification.** After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a



new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

**20. Tribal Cultural Resource Inadvertent Discovery.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
- The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

### **Administrative Conditions**

21. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Planning Department for placement in the subject file.
22. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.
23. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.
24. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.
25. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
26. **Building Plans.** Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the City Planning Department and the Department of Building and Safety.
27. **Project Plan Modifications.** Any corrections and/or modifications to the Project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, Housing Department, or other Agency for Code compliance, and which involve a change in site plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.
28. **Indemnification and Reimbursement of Litigation Costs.** The Applicant shall do all of the following:
  - (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.



- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

## FINDINGS

### A. ENTITLEMENT FINDINGS

#### Transfer of Floor Area Rights Findings

1. **The increase in Floor Area generated by the proposed Transfer is appropriate with respect to location and access to public transit and other modes of transportation, compatible with other existing and proposed developments and the City's supporting infrastructure, or otherwise appropriate for the long-term development of the Central City.**

The Project would involve the construction of a 50-story mixed-use building with a maximum height of 592 feet. The Project's commercial and residential uses would total 554,927 square feet of floor area, consisting of 580 residential units, 7,499 square feet of ground-floor commercial retail and restaurant uses, parking, and residential open space amenities.

The Project Site is close to several bus transit lines, rail lines, and local shuttle service. Specifically, the Project Site is located approximately two blocks away from the 7th/Metro Center Metro Rail station, which contains the Metro B, D, A, and L Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro bus lines, including local and rapid lines, as well as Los Angeles Department of Transportation's (LADOT's) Commuter Express lines, run south along Grand Avenue, with the nearest stop midblock on Grand Avenue between 7th Street and 8th Street. Metro Lines 66 and 81, as well as LADOT's Commuter Express Lines 419, 431, 437 and 534 and Antelope Valley Transit Authority's (AVTA) Commuter Line 785, run west on 8th Street. LADOT's DASH Lines have stops within one block north on 7th Street and within one block west on Flower Street. Also, within two to three blocks of the Project Site are Silver Lines 910 and 950; Foothill Transit Lines SS, 493, 495, 497, 498, 499 and 699; Santa Monica's Big Blue Bus Line R10; Torrance Transit Line 4X; and Montebello Bus Lines 40 and 50. These bus lines connect passengers to the Project Site from various locations across the City and throughout Los Angeles County. Additionally, the Project Site is within walking distance of various employment opportunities in the Downtown area.

The intensity and mix of the residential and commercial uses are compatible with the current density and mix of uses in the downtown Los Angeles area. The Project Site is located in an area which is developed with low- to high-rise, mixed-use buildings. Immediately to the north of the Project Site are two above-grade parking garages, an eight-story parking structure along Hope Street and a four-story parking structure along Grand Avenue. Across Hope Street to the west is a recently renovated mixed-use development (The Bloc) that encompasses an entire city block and includes a 33-story office tower and a 26-story hotel tower, with a nine-story parking and retail podium. To the east of the Project Site, across Grand Avenue is a 112-foot-tall mixed-use residential and commercial development, which includes a ground floor grocery store. To the south of the Project Site are multiple office/commercial buildings and other residential developments, including a high-rise, residential tower (i.e., 8th+Hope) with a height of 246 feet immediately to the southwest at 801 S. Hope Street, a mixed-use high-rise building at 801 S. Grand Avenue with a height of 310 feet, a mixed-use high-rise building 888 S. Hope Street with a height of 370 feet, and three other high-rise residential towers (i.e., Atelier at 801 S. Olive Street with a height of 358 feet; the approved 29-story 845 S. Olive Street Tower; and the 820 S. Olive/825 S. Hill Street Tower with a height of 637 feet) to the southeast on Olive Street between 8th Street and 9th Street. In the Project vicinity, are other high-rise buildings that include commercial and residential uses.



The increase in floor area generated by the proposed transfer will allow the development of a compatible mixed-use project consisting of 580 residential units with varying unit types, and 7,499 square feet of restaurant and retail uses on the Receiver Site. The Project is considered an infill development within a highly urbanized area of the City, which is designated for high-density residential development by the Community Plan. The Project Site is approximately 34,679 square feet and is permitted a maximum 6:1 FAR (or 208,074 square feet of floor area) as restricted by the D Limitation pursuant to Ordinance 164,307 - Subarea 1910. The Applicant has requested a Transfer of 346,853 square feet of floor area from the Donor Site located at 1201 South Figueroa Street (Los Angeles Convention Center), to permit a maximum 9.25:1 FAR (554,927 square feet) on the Receiver Site. The Transfer is appropriate for the long-term development of Central City because it will enable the Project to include residential, retail, and restaurant uses that would complement the other uses in the Financial Core District which contains numerous high-rise office buildings, a variety of commercial opportunities, and nearby entertainment attractions such as the Staples Center, Los Angeles Convention Center, and L.A. Live. The Transfer would allow more residents to live, work, and shop within the Financial Core District, while promoting access to the different amenities and attractions and contributing more retail and restaurant options within the area for residents and visitors. The Transfer would also contribute to the revitalization and modernization of Downtown Los Angeles including job creation and increased City tax revenue generation, maintaining the strong image of downtown as the major center of the metropolitan region, and serving as a linkage and catalyst for other downtown development.

The Project will be easily accessible via public transit, is consistent with both existing and proposed development in the Financial Core District, will be in close proximity to jobs, housing, and a wide range of uses and public services, can be served by the existing utilities, and will support the development planned for the Central City Community Plan Area. Thus, the proposed Transfer will be appropriate for the Receiver Site.

## 2. The Transfer serves the public interest.

As part of the Transfer Plan, a Public Benefit Payment is required and must serve a public purpose, such as: providing for affordable housing; public open space; historic preservation; recreational; cultural; community and public facilities; job training and outreach programs; affordable childcare; streetscape improvements; public arts programs; homeless services programs; or public transportation improvements. The transfer serves the public interest by facilitating a project that will contribute to the sustained economic vitality of the Central City area, and by contributing a total Public Benefit Payment of \$9,828,451 (based on a formula that includes the transfer of 346,853 square feet) and a TFAR Transfer Payment of \$1,734,265 (based on the transfer of 346,853 square feet from the Convention Center multiplied by \$5), in accordance with LAMC Section 14.5.10. The Public Benefit Payment consists of a 50 percent cash payment of \$4,914,225 to the Public Benefit Payment Trust Fund, and 50 percent of the payment for public benefits to be directly provided by the Applicant, as indicated in the table below. As such, the Transfer of Floor Area serves the public benefit interest as it complies with the specific requirement for the transfer to occur.

<b>Public Benefit Payment Transfer Plan</b>	
Total Public Benefit Payment	\$9,828,451
50% Public Benefit Cash Payment	\$4,914,225
50% Public Benefit Direct Provision	\$4,914,225
<b>Allocation of Public Benefit Direct Provision</b>	

Council District 14 Public Benefits Trust Fund for Affordable Housing	100%	\$4,914,225

**3. The Transfer is in conformance with the Community Plan and any other relevant policy documents previously adopted by the Commission or the City Council.**

The Receiver Site (Project Site) of the Transfer is located within the Central City Community Plan, and has a land use designation of Regional Commercial and is zoned C2-4D. The Community Plan describes the Transfer of Floor Area Rights (TFAR) as follows (Page III-19): “The transfer of floor area between and among sites is an important tool for Downtown to direct growth to areas that can best accommodate increased density and from sites that contain special uses worth preserving or encouraging.”

The Site is subject to Development D Limitation, contained in Subarea 1910 of Ordinance No. 164,307, which limits the FAR of a building to 6:1, unless a transfer of floor area is approved. The transfer will re-allocate 346,853 square feet of unused, allowable floor area from the Donor Site (Los Angeles Convention Center) and permit a maximum FAR of 9.25:1 on the Receiver Site, which will be consistent with the Community Plan and other relevant policy documents, which provides for a transfer of floor area up to a 13:1 FAR.

The Transfer will permit the development of the Receiver Site with a Project that is consistent with the objectives and policies of the Central City Community Plan, including:

*Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.*

*Objective 2-1: To improve Central City’s competitiveness as a location for offices, business, retail, and industry.*

*Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.*

*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 theaters, and other specialty uses to reinforce existing pockets of activity.*

The Project will provide up to 580 residential units, including three-bedroom units, two-bedroom units, one-bedroom units, and studio units on a site located in the Financial Core District of the Community Plan. In addition, the project would provide 7,499 square feet of ground-floor commercial space, consisting of restaurants and retail stores fronting 8<sup>th</sup> Street. The Project’s supply of residential units and restaurant and retail uses aligns with the Community Plan’s vision for the Financial Core District, achieving Objective 1-2. The project will bridge the gap between housing and employment by providing homes for the increasing numbers of downtown workers, achieving Objective 2-1 and Objective 2-4.

In addition, the project site is located near the Los Angeles Sports and Entertainment District (LASED) (approximately 0.4 miles to the southwest) and the Convention Center (approximately 0.7 miles southwest) and will be consistent with the Central City Community Plan’s vision for the Financial Core District as a Convention Center/Arena Sphere of Influence



by developing the site with a mix of uses that complement the entertainment and commercial uses within the LASED and the Convention Center. The proximity of the project site to LASED and the Convention Center will locate patrons and residents within walking distance to various businesses, conventions, trade shows, and tourist destinations and provide a linkage to the other surrounding Central City Community Plan Districts.

The project will provide commercial spaces allowing for restaurant and retail uses, helping to create an active, 24-hour downtown that will serve the residents and employees of the Financial Core District, as well as visitors. The addition of new uses, as well as up to 580 residential units in the Financial Core District supports the existing retail base by strengthening current and creating new residential demand for goods and services, as well as creating synergy between different commercial uses in the Central City Community Plan area. The project will also improve the streetscape along 8th Street, Hope Street, and Grand Avenue with street lighting, trees, landscaping, and bicycle parking, enhancing the overall pedestrian environment.

Therefore, the Project is consistent with the applicable Central City Community Plan Objectives and Policies.

### **Zone Variance Findings**

In order for a variance to be granted, all five of the legally mandated findings delineated in City Charter Section 562 and Los Angeles Municipal Code Section 12.27 must be made in the affirmative. Following (highlighted) is a delineation of the findings and the application of the relevant facts of the case to same:

**4. That the strict application of the provisions of the zoning ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations.**

The Project site consists of a 34,679 square-foot (0.80-acres) property which fronts 8<sup>th</sup> Street to the south, Hope Street to the west, Grand Avenue to the east, and a shared lot line on the north side. The Project involves the construction of a 50-story mixed use development comprised of 580 residential dwelling units and up to 7,499 square feet of ground floor commercial uses on a 34,679 square foot site. The Project would provide vehicular parking in three subterranean levels and eight above-grade levels, and a total of 640 parking spaces with a mixture of standard and compact spaces, with code required electrical vehicle charging spaces. The building will have a maximum height of 592 feet, and a floor area ratio of 9.25:1 (554,927 square feet).

The Project has requested a Variance to deviate from the required driveway aisle width of 27 feet, 4 inches for standard parking stalls and 25 feet, 4 inches for compact parking stalls, and to provide a 24 feet drive aisle for all parking areas. Additionally, the Project is requesting a deviation from the requirement to provide a 10-inch clear space from parking stall obstructions. The Project proposes ingress/egress from both Hope Street and Grand Avenue with a circular drop-off area on the ground floor and access to all parking garages and no driveways along 8<sup>th</sup> Street. The Project was designed with no driveways on 8<sup>th</sup> Street to promote a high-quality pedestrian environment at street level, with active ground floor uses that wrap around the building's corners. Additionally, the Project has been conditioned to require parking stalls to be designed in compliance with LAMC 12.21 A.

The driveway aisle and 10-inch clear space deviation is imperative to provide the necessary parking for the mixed-use project that would contribute to the supply of market-rate housing

and employment within the Financial Core District with the Central City Community Plan of the Downtown Area.

The Project as proposed also supports the City's housing goals and provides economic benefits in employment and tax revenue. Therefore, the Project as proposed would not result in practical difficulties of unnecessary hardship inconsistent with the general purposes and intent of the underlining zone.

**5. That there are special circumstances applicable to the subject property such as size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity.**

The Project is an infill development within an urban setting, and is zoned C2. The C2 zone requires a minimum lot size of 5,000 square feet and a minimum lot width of 50 feet. The existing lot dimensions are 107 feet along Hope Street and 100 feet along Grand Avenue, and 336 feet along 8<sup>th</sup> Street. This is a relatively wide property compared to its depth compared to other existing high-rise, mixed-use projects in the vicinity. In order to achieve an efficient layout of parking spaces and circulation, the building is oriented lengthwise along 8<sup>th</sup> Street. As a result, the parking garage is narrow, which limits the amount of parking that can be provided on each level, as well as constraining the drive aisle width and turning radii between the parking stalls. The Project is required pursuant to the Downtown Design Guide to provide 75 percent of its ground floor frontage along 8<sup>th</sup> Street with active uses, and was designed with no driveways on 8<sup>th</sup> Street in order to enhance the pedestrian realm by eliminating vehicular and pedestrian conflicts. Therefore, site access and vehicular ramps could only be located along the rear property line, with one driveway on Hope Street and one on Grand Avenue. This is an additional circumstance that limits the configuration of vehicular circulation in the garage.

The Downtown Street Standards require a 17-foot-wide sidewalk with a 7-foot-wide average sidewalk easement along Grand Avenue, a 15-foot-wide sidewalk with a 3-foot-wide average sidewalk easement along Hope Street, and a 12-foot-wide sidewalk with a 5-foot-wide sidewalk easement. While sidewalk and easement widths are required for other downtown projects, the subject property has three street frontages which, in combination with the lot configuration and driveway access issues mentioned above, represents special circumstances that do not apply to other properties in the vicinity.

Therefore, the reduced drive aisle width and reduction in clearance space adjacent to an obstruction allow for a building configuration that is suitable for the lot size shape, and internal circulation. As such, there are special circumstances related to the size, shape, and location of the lot that do not generally apply to other properties in the vicinity. Therefore, the variance requests are necessary to develop the subject site in a manner consistent with the general plan, community plan, and nearby development.

**6. That the variance is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property in the same zone and vicinity but which, because of the special circumstances and practical difficulties or unnecessary hardships, is denied to the property in question.**

The existing lot dimensions are 107 feet along Hope Street and 100 feet along Grand Avenue, and 336 feet along 8<sup>th</sup> Street. This is a relatively wide property compared to its narrow depth compared to other existing high-rise, mixed-use projects in the vicinity. In order to achieve an efficient layout of parking spaces and circulation, the building is oriented lengthwise along 8<sup>th</sup> Street. As a result, the design of the parking garage is narrow, which limits the amount of



parking that can be provided on each level, as well as constraining the drive aisle width and turning radii between the parking stalls. The Project is required pursuant to the Downtown Design Guide to provide 75 percent of its ground floor frontage along 8<sup>th</sup> Street with active uses, and was designed with no driveways on 8<sup>th</sup> Street in order to enhance the pedestrian realm by eliminating vehicular and pedestrian conflicts. Therefore, site access and vehicular ramps could only be located along the rear property line, with one driveway on Hope Street and one on Grand Avenue.

The Downtown Street Standards require a 17-foot-wide sidewalk with a 7-foot-wide average sidewalk easement along Grand Avenue, a 15-foot-wide sidewalk with a 3-foot-wide average sidewalk easement along Hope Street, and a 12-foot-wide sidewalk with a 5-foot-wide sidewalk easement. While sidewalk and easement widths are required for other downtown projects, the subject property has three street frontages which, in combination with the lot configuration issues mentioned above, represents an unnecessary hardship. Therefore, the granting of the variance is necessary for the preservation and enjoyment of a substantial property right and use generally possessed by other property in the same zone and vicinity but which, because of the special circumstances and practical difficulties or unnecessary hardships, is denied to the subject property.

**7. That the granting of the variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the same zone or vicinity in which the property is located.**

The Project involves the construction of a 50-story mixed use development comprised of 580 residential dwelling units and up to 7,499 square feet of ground floor commercial uses on a 34,679 square foot site. The Project would provide vehicular parking in three subterranean levels and eight above-grade levels, and a total of 640 parking spaces with a mixture of standard and compact spaces. The Project will improve existing site conditions by redeveloping an underutilized lot, and will enhance the public welfare and surrounding neighborhood by providing wider sidewalks and other pedestrian improvements, and by eliminating the existing driveways along 8<sup>th</sup> Street, consolidating vehicular access to the rear of the site. The variance requests to reduce the drive aisle width and to provide an additional 10-inch clear space to parking stall widths adjacent to an obstruction would be internal to the Project's vehicular parking garage, and therefore, do not constitute an unsafe or hazardous environment for surrounding properties or other properties in the vicinity. The conditions and circumstances which create the need for the variance are unique to the subject property, as is the method of relief from those circumstances. Therefore, the reduced drive aisle width and relief from clearance requirement will not affect other properties or property rights in the vicinity. The Project as conditioned will not be materially detrimental to the public welfare or injurious to the property or improvements in the same zone and vicinity in which the property is located.

**8. That the granting of the variance will not adversely affect any element of the General Plan.**

The Central City Community Plan designates the site for Regional Commercial land uses and allows for a corresponding zone of C2-4D. The Project Site's C2 zone permits an array of land uses including office, hotel, residential and commercial uses. The Project Site's Height District No. 4 has no height limit and permits a FAR of 13:1. However, the "D" limitation restricts the FAR to 6:1 unless a Transfer of Floor Area (TFAR) is approved (Ordinance No. 164,307). The Project includes a TFAR entitlement request which would allow an FAR of 9.25:1. Therefore, the Project's proposed maximum FAR would result in 554,927 square feet of floor area. There is no limit on the maximum number of dwelling units and the Greater Downtown Housing Incentive Area (ZI 2385) allows for zero setbacks along the front, side and rear property lines.

The Downtown Design Guide and Downtown Street Standards regulate street frontage standards, pedestrian walkways, and roadway improvement requirements, among other design regulations.

A stated goal of the Central City Community Plan is the continued economic and social viability of Central City which “depends on the contributions of a stable population and vibrant, cohesive neighborhoods. Therefore, a primary objective of the Central city Plan is to facilitate the expansion of housing choices in order to attract new and economically and ethnically diverse households.” Furthermore, the Community Plan includes the following objectives and policies which the proposed project advances:

**Objective 1-2:** To increase the range of housing choices available to Downtown employees and residents.

**Objective 1-3:** To foster residential development which can accommodate a full range of incomes

**Policy 1-3.1:** Encourage a cluster neighborhood design comprised of housing and services.

The use of the property for a mixed-use residential and commercial purposes is consistent with the Regional Commercial land use designation and corresponding C2 zone and supports Objective 1-2, Objective 1-3 and Policy 1-3.1 of the Central City Community Plan. The variance requests to reduce the drive aisle widths and to allow relief from 10-inch clear space requirements do not change the allowable uses permitted by the land use designation and zone and are instead necessary to provide parking and internal circulation for the Project. In conjunction with other entitlement requests, the variance requests for the Project would be in substantial conformance with the General Plan and the Central City Community Plan. Granting the variance would not adversely affect any element of the General Plan and granting of the variances will not adversely affect any element of the General Plan.

### **Project Permit Adjustment (Director’s Determination for Alternative Design) Findings**

- 9. There are special circumstances applicable to the project or project site which make the strict application of the urban design regulation(s) impractical.**

#### **Ground Floor Treatment**

Pursuant to Section 4 of the Downtown Design Guide, Hope Street and Grand Avenue are designated as Retail Street and requires that at least 75 percent of the Project’s street frontage, excluding access to parking, must be designed to accommodate active uses such as retail, professional office, or live work uses building lobbies, recreation rooms, common areas, gathering or assembly spaces cultural facilities, and courtyards with direct access to each of these uses from the sidewalk. The Downtown Design Guide also requires where retail streets intersect other streets, the ground floor retail space should wrap the corner onto the intersecting streets, excluding driveways used for vehicular ingress and egress.

The Project includes an entitlement request for a Project Permit Adjustment for an alternative design to the ground floor requirements of the Downtown Design Guide along 8th Street, Grand Avenue and Hope Street. Excluding vehicular driveways, the 8<sup>th</sup> Street building frontage is approximately 320.9 feet, and proposes 216.9 feet, or approximately 67 percent of the frontage length, of active uses (commercial and residential lobby areas) and 104 feet,

33 percent of non-active uses (stairwell and drop off and outdoor lobby area). Grand Avenue's building street frontage is 71.1 feet, and proposes 25 feet, or approximately 35 percent of the frontage length, of active uses (commercial uses) and 46.1 feet of non-active uses (mechanical equipment rooms and stairwell); and Hope Street's building frontage is 69.1 feet, and proposes 32.5 feet, or 47 percent, of active uses (commercial) and 36.6 feet of non-active use (mechanical equipment room)

The Project Site's narrow average lot width of 107.5 feet and the 34,679 square-foot lot size and the need to place required mechanical areas and stairways constrain the Project's ability to meet the 75 percent active street frontage requirement. Nonetheless, to enhance the ground floor facades facing the street and Porte cochere/drop off area along 8<sup>th</sup> Street, the ground floor mechanical utility rooms and code required stairwell exit areas were design to complement the streetscape façade of the active uses along each street. The building's street facing elevations have been designed to integrate architectural elements such as finished ceramic tile and decorative woven metal screen. These design features complement the building's street facing facade by eliminating blank walls and providing an attractive visual relief to support the pedestrian realm. In addition, retail space would be visible at and wrap around the corners of 8<sup>th</sup> Street and Grand Avenue and 8<sup>th</sup> Street and Hope Street, in accordance goals established by the Downtown Design Guide. This would further support the Downtown Design Guide's intent to enhance street level interest and promote pedestrian traffic.

Therefore, the lot width, lot dimension and building constraints discussed above represent special circumstances applicable to the Project site which make the strict application of the urban design regulations of the Downtown Design Guide impractical. The proposed ground floor treatment alternative design of the Project achieves the overall objectives of the Downtown Design Guide requirements to promote design excellence and creative infill development solutions.

### **Sidewalk Easement Projections.**

The Downtown Street Standards requires a 12-foot sidewalk and 5-foot sidewalk easement along 8<sup>th</sup> Street, a 15-foot sidewalk and 3-foot average sidewalk easement along Hope Street, and a 17-foot sidewalk and 7-foot average sidewalk easement along Grand Avenue. Pursuant to Section 3 of the Downtown Design Guide, buildings may project horizontally up to a maximum of 5 feet over the required sidewalk easement at a minimum vertical height of 40 feet above the sidewalk to accommodate street trees. The Project includes an entitlement request for a Project Permit Adjustment for an alternative design to allow building and balcony projections of up to 9 feet into the 3-foot average sidewalk easement area (variable easement from 1.5 to 9 feet in width along Hope Street), in lieu of a maximum 5 foot projection into a sidewalk easement; to allow building projections of up to 19 feet into the 7-foot average sidewalk easement (variable easement from 3.5 to 21 feet in width) along Grand Avenue, in lieu of a maximum 5-foot projection; and to allow projections to begin at an elevation of 25 feet above the sidewalk along Hope Street and Grand Avenue, in lieu of a minimum of 40 feet above the sidewalk.

The Project would otherwise comply with the Downtown Design Guide projection requirements along 8<sup>th</sup> Street. The balconies along 8<sup>th</sup> Street, would not project into the sidewalk easement at a height lower than 40 feet below the sidewalk. However, due to the site's narrow average lot width of 107.5 along Hope Street and Grand Avenue, the building



must maximize its dimensions along all facades, and therefore, requires the building to project into the sidewalk easement along Hope Street and Grand Avenue. To accommodate the Project's parking demand and parking maneuverability and dimension requirements within the building the alternative design is requested. Hope Street's building façade includes parking uses. On Grand Avenue, the building is designed so that the façade is wrapped with active uses, with commercial on the ground floor, residential leasing offices on the second floor, and residential units beginning on the third floor, which is where the building projection into the sidewalk easement would occur. This design places residential uses near the sidewalk, which fosters pedestrian safety and enhances the public realm. Since the sidewalk along Hope Street and Grand Avenue is 15 feet and 17 feet wide, respectively, there is sufficient horizontal width to accommodate pedestrian walkability, as well as providing adequate space for street tree canopy growth. This alternative design would advance the Downtown Design Guide's purpose to provide sidewalks that are walkable and accommodate a variety of uses.

Therefore, the lot dimension and building constraints discussed above represent special circumstances applicable to the project site which make the strict application of the Downtown Design Guide regulations impractical. Through the proposed alternative design, the Project nonetheless achieves the overall objectives of the Downtown Design Guide, Urban Design requirements to promote design excellence and creative infill development solutions.

**10. In granting the request, the Director has imposed project requirements and/or decided that the proposed project will substantially comply with all applicable specific plan regulations.**

The alternative design to allow building and balcony projections of up to nine feet into the three-foot average sidewalk easement area (variable easement from 1.5 to nine feet in width along Hope Street), in lieu of a maximum five-foot projection into a sidewalk easement; to allow building projections of up to 19 feet into the seven-foot average sidewalk easement (variable easement from 3.5 to 21 feet in width) along Grand Avenue, in lieu of a maximum five-foot projection; and to allow projections to begin at an elevation of 25 feet above the sidewalk along Hope Street and Grand Avenue, in lieu of a minimum of 40 feet above the sidewalk, and the alternative design to allow ground floor active uses to deviate from the 75 percent ground floor treatment required in the Downtown Design Guide would continue to advance the Downtown Design Guide's purpose to provide sidewalks that are walkable and accommodate a variety of uses. The Project would enhance the pedestrian experience along the street frontages and continue to provide required sidewalk widths and sidewalk easements along the streets abutting the Project. The Project would also meet the ground floor treatment requirements by providing storefront entries along the sidewalks. Additionally, the ground floor treatment along the streets which include glass and aluminum store front systems, decorative woven metal screen, ceramic tile advances the Downtown Design Guide vision of avoiding blank walls. The project, as proposed and conditioned, substantially complies with the provisions of the Downtown Design Guide with regard sidewalk easement projections along Grand Avenue, and ground floor requirements for active uses. Therefore, the Project will substantially comply with the applicable Downtown Design Guide regulations.

**11. 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.**

The Project was designed to adhere to the development requirements of the Downtown Design Guide. Due to the narrow lot width and lot size constrains the Project applicant

proposes an alternative design approach to sidewalk easement projections along Hope Street and Grand Avenue, and an alternative design approach for ground floor active use requirements along 8<sup>th</sup> Street, Grand Avenue and Hope Street. These deviations are appropriate to develop the proposed mix-use building consisting of 580 residential units and ground floor commercial, retail and restaurant uses. The alternative design to the sidewalk easement projections and ground floor treatment frontage requirements is appropriate in that it substantially complies with the provisions of the Downtown Design Guide with regard sidewalk easement projections along Grand Avenue, and ground floor requirements for active uses and would not pose any detrimental effects on surrounding properties and public-rights-of way.

The Project will improve existing site conditions and the surrounding neighborhood, as well as enhancing the public welfare through the provision of wider sidewalks, street trees, bicycle infrastructure, security lighting, landscaping, and active uses along a significant portion of the building's ground floor.

The Project's contemporary building design and architectural elements including prefinished aluminum frame doors and windows, vision and spandrel glass, ceramic tile, and decorative metal woven screen, the Project's alternative design to sidewalk easement projections along Grand Avenue and Hope Street and alternative design to ground floor treatment along 8<sup>th</sup> Street, Grand Avenue and Hope Street would be compatible with the neighborhood character of the surrounding district.

The Project will enhance the surrounding neighborhood by redeveloping a site currently used for parking with a mixed-use development that provides residential housing with ground floor commercial, retail, restaurant uses, and necessary upgrades to the existing streetscape. Finally, the Environmental Impact Report prepared for the Project found that the project would have less than significant impacts with incorporated mitigation for most impact categories, except for temporary construction-related noise and vibration impacts. As these impacts are temporary in nature, the Project would not have a permanent detrimental effect on surrounding properties. The benefits of the Project have been balanced against the significant and unavoidable impacts, and the City has found that the Project's benefits outweigh and override the significant unavoidable impacts relating to noise and vibration. Therefore, in consideration of the above, the project would not have detrimental effects on surrounding properties and public rights-of-way.

**12. The project incorporates mitigation measures, monitoring of 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.**

The Environmental Impact Report (EIR) determined that the Project has less than significant impact with mitigation measures for Cultural Resources (Archeological Resources), Geology and Soils (Paleontological Resources), and Noise (On-Site construction Vibration – Building Damage). The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a less than significant level. Based on the information and analysis set forth in the EIR, the project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the project.

The EIR determined that the environmental impacts for Noise (Construction; Groundborne Noise and Vibration Human Annoyance - Construction) are significant and unavoidable. In order to approve the Project with significant unavoidable impacts, the City has adopted a Statement of Overriding Considerations. The City recognized that significant and unavoidable impacts would result from implementation of the project. Having (i) adopted all feasible

mitigation measures, (ii) rejected as infeasible the alternatives to the project, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City found that each of the Project's benefits outweigh and override the significant unavoidable impacts relating to noise and vibration identified above.

Mitigation measures identified for the project are described and included in the certified EIR, and the Mitigation Monitoring Program (MMP). The City found that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP. Each of the mitigation measures identified in the MMP have been incorporated into the Project as conditions of approval. Therefore, the Project incorporates mitigation measures, monitoring of 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.

### **Director's Decision Findings**

#### **13. That the open space provided conforms with the objectives of LAMC Section 12.21 G.**

Pursuant to LAMC Section 12.21 G.3, the Project is required to plant one tree for every four dwelling units proposed. The Project proposes 580 residential dwelling units, which would require a total of 145 on-site trees. The Applicant requests a Director's Decision to permit the planting of 79 on-site trees, in lieu of the otherwise required 145 on-site trees, in conjunction with the payment of an in-lieu fee for the remaining 66 required on-site trees, in accordance with LAMC Section 62.177(d). The property lies within the Central City Community Plan and the Greater Downtown Incentive Area (ZI No. 2385), in accordance with the Greater Downtown Incentive Area no setbacks are required. However, the Downtown Street Design Guide requires a 3-foot average sidewalk easement along Hope Street, a 7-foot average sidewalk easement along Grand Avenue and a 5-foot sidewalk easement along 8th Street. The Downtown Design Guide permits up to 5 feet of building and balcony projections into these easements at 40 feet above grade. The Project's limited ground floor area available for planting trees, the 34,679 square foot lot size, and the placement of the structure within and abutting the required sidewalk easement areas would limit ground floor areas available for planting trees. In accordance with LAMC Section 62.177(d), and as conditioned, the Applicant requests to pay an in-lieu fee of \$2,612 for each of the 66 trees that are not planted on-site, for a total of \$172,392. The Project will provide the required common and private open space therefore meeting the objectives of the LAMC Section 12.21 G.

#### **14. That the proposed project complies with the total usable open space requirements.**

Pursuant to LAMC Section 12.21 G.3, the Project is required to provide 63,600 square feet of usable open space and 25% of the common open space area is required to be landscaped, which the Project complies with. The Project is also required to plant one tree for every four dwelling units proposed. The Project proposes 580 residential dwelling units, which would require a total of 145 on-site trees.

The Project would provide 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, and 8,596 square feet of outdoor/covered space, and 28,100 square feet of private open space. Pursuant to ZA-2021-7053-ZAI the 8,596 square feet of covered exterior open space would count towards the common open space requirements per LAMC Section 12.21 G.3. The Project would also provide private balconies for most of the dwelling units, which would comprise a total of 28,100 square feet of private open space. Therefore, the Project would provide 65,193 square feet of open space, which would exceed the 63,600



square feet of open space required for the Project. Additionally, providing fewer code required trees would not reduce the total usable open space area and therefore the project would continue to meet the usable open space requirements.

### **Site Plan Review Findings**

#### **15. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.**

**Framework Element.** The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework's Long-Range Diagram identifies the Project Site as located within the Downtown Center, an international center for finance and trade, the largest government center in the region, and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation, and Convention Center facilities. The Downtown Center is generally characterized by high-rise buildings and floor area ratios up to 13:1.

The 8<sup>th</sup>, Grand and Hope Project involves the construction of a 50-story mixed use building with a maximum height of 592 feet above grade. The Project's commercial and residential development would total 554,927 square feet of floor area, consisting of 580 residential units, 7,499 square feet of ground-floor commercial retail and restaurant uses, and approximately 65,193 square feet of residential open space amenities. The residential uses would be located on levels 3 through 49 and vehicle parking would be provided within three subterranean levels and eight above-grade levels.

The Project satisfies the following objectives and policies of the Land Use Chapter of the General Plan Framework:

*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.*

*Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.*

*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.*

*Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.*

The Project will provide new multi-family housing, commercial retail, and restaurants in the City's Downtown Center, as well as providing a public benefit in the way of a contribution towards affordable housing, including to the Council District's Affordable Housing Trust Fund. The Project will support Objective 3.4 and Policy 3.4.1 by providing a high density of residential units and ground-floor commercial/retail/restaurant uses, within a neighborhood that is in close proximity to many transit opportunities. The Project will support Objective 3.15 and Policy 3.15.3 as the site is designated as a Transit Priority Area, and is well-served by public transit, including both rail and bus service. The site is located two blocks from the entrance to the 7<sup>th</sup>/Metro Center Rail Station, which provides rail service to the Metro A, B, D, and L Lines which is considered a hub of the regional rail network. Furthermore, the project would enhance the pedestrian activity of the area through the provision of ground floor commercial uses and along 8<sup>th</sup> Street, Hope Street and Grand Avenue, and will provide streetscape improvements, supporting Objective 3.16. At the corner of Hope Street and 8<sup>th</sup> Street, the Project will include areas for outdoor seating. In addition, there will be no driveway curb cuts along 8<sup>th</sup> Street and the sidewalks around the project site would be improved with street trees, landscaping, pedestrian lighting, and bicycle racks. The Project's commercial and residential uses, amenities, and proximity to public transit will encourage pedestrian activity and provide an incentive for residents not to use their cars for commuting errands, dining, entertainment, and employment, thereby reducing vehicle trips.

The Project advances numerous goals and policies contained in the Framework Element's Economic Development chapter, including the following:

*Goal 7A: A vibrant economically revitalized City.*

*Goal 7D: A City able to attract and maintain new land uses and businesses.*

*Goal 7G: A range of housing opportunities in the City.*

The Project would redevelop the site by replacing an existing surface parking lot and four-story parking structure with a mixed-use high-rise building, which includes residential units and commercial, retail, and restaurant uses. The Project would provide for more housing opportunities in the area with a mixture of unit types, while introducing new commercial, retail and restaurant opportunities, which will serve the residents of the neighborhood. The mix of uses and additional residents will contribute to the Downtown Center, further supporting nearby businesses and job centers with new residents and shopping and dining opportunities. These components of the Project will contribute to employment opportunities and economic growth, strengthen the commercial sector, and contribute to a balance of land uses that meets the needs of residents.

**Housing Element.** The City's Housing Element for 2021-2029 was adopted by City Council on June 14, 2022. The Proposed Project would meet the objectives and policies set forth in the Housing Element as described below.

***Policy 1.1.2: Plan for appropriate land use designations and density to accommodate an ample supply of housing units by type, cost, and size within the City to meet housing needs, according to Citywide Housing Priorities and the City's General Plan.***

***Objective 1.2:*** Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.

***Policy 1.2.2:*** Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.

***Policy: 3.1.2:*** Promote new development that furthers Citywide Housing Priorities in balance with the existing architectural and cultural context.

***Policy 3.1.3:*** Develop and implement design standards that promote quality residential development.

***Objective 3.2:*** Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.

***Policy 3.2.2:*** Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.

***Policy 3.2.5:*** Promote and facilitate the reduction of water, energy, carbon and waste consumption in new and existing housing.

The Project will further key Housing Element policies and objectives by providing additional supply of housing units by type, cost, and size to meet housing needs and Citywide housing priorities noted in Policy 1.1.2, Objective 1.2, Policy 1.2.2. The Project would provide 580 residential units which include a unit mix consisting of three-bedroom units, two-bedroom units, one-bedroom units, and studio units. The Project also supports Objective 3.2 and Policy 3.2.2 of supporting a mix of units that will accommodate a mixture of incomes, and uses that provide access to jobs, amenities, services and transportation options. The Project would construct a mixed-use building that is close to multiple transit options and include a total of 27 short-term and 224 long term bicycle parking spaces to support multi-modal transportation options for the residential and commercial uses. Additionally, the Project is located in the transit-rich Downtown Center, that is served by many local and rapid bus lines and train lines. By providing residential units, restaurants, and retail at the site, the Project will encourage walking, active transportation, and public transit usage, thereby reducing vehicular trips and overall vehicle miles traveled. The Project would also support Policy 3.1.3 of promoting quality development by the Project's use of quality materials use which consist of utilizing a mix of glass and aluminum storefront system, ceramic tile, aluminum panels, pre-finished aluminum frame and cap rail with clear continuous glass, and decorative woven metal screen to provide for a varied texture and transparent for the retail uses and residential lobby area. The podiums also utilize pre-finished aluminum frame and continuous clear, opaque and low e coating glass and partial vision glass with fritted inner layer. The ceramic tile at the ground level would include a glazed finish to soften the façade of the building and create a warm and inviting experience for visitors and residents. Lastly, the Project supports Policy 3.2., the building would incorporate sustainability features such as Energy Star-Labeled products by incorporating Project Design Feature GHG-PDF-1. Additionally, the Project's Project Design Features GHG-PDF-1 and WAT-PDF-1 would incorporate water conservation features, such as high-efficiency toilets with flush volume of 1.1 gallon of water per flush or less, showerheads with a flow rate of 1.5 gallons per minute or less, and drip/subsurface irrigation.



### **Required RHNA Finding**

The Project is located on a parcel identified in the Inventory of Sites prepared for the 2021-2029 Housing Element, which was anticipated to accommodate 1.59 lower-income units. The Project includes zero lower-income units. Therefore, the Project would result in fewer units by income category than those identified in the Housing Element.

The Project would meet the objectives and policies set forth in the Housing Element as described above.

Pursuant to Government Code (GC) Section 65863(b)(2), the City finds that while the proposed project would result in fewer units by income category than those identified in the Inventory of Sites prepared for the 2021-2029 Housing Element, the remaining sites identified in the Housing Element of the General Plan are adequate to meet the requirements of GC Section 65583.2 and to accommodate the jurisdiction's share of the regional housing need pursuant to GC Section 65584. As of April 1, 2023, the City's remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low-Income Units, 67,086 Low Income Units, 74,964 Moderate Income Units, and 168,892 Above-Moderate Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low-Income Units, 332,096 Low Income Units, 63,107 Moderate Income Units, and 907,466 Above-Moderate Income Units. The excess Above-Moderate Income Unit capacity may accommodate both Moderate and Above-Moderate Unity RHNA Allocations. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the planning period, and in compliance with the requirements of GC 65583.2.

**Plan for a Healthy Los Angeles.** The Project meets the policies set forth in the General Plan's Health and Wellness Element.

*Policy 5.1: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.*

*Policy 5.7: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors, and others susceptible to respiratory diseases.*

**Air Quality Element.** The Project meets the policies set forth in the General Plan's Air Quality Element.

*Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.*

*Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations*

Policy 5.1 and 5.7 of the Plan for a Healthy LA, the Health and Wellness Element, and Policy 4.2.3 of the Air Quality Element are policy initiatives related to the reduction of air pollution and greenhouse gases. As mentioned above, the Project includes features described in Project Design Feature AIR-PDF-1, the Project would include where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators will be used during construction. Additionally, AIR-PDF-2 notes that the Project will not include the use of natural gas-fueled fireplaces in the proposed residential units. The Project would include EV parking and charging stations in accordance with LAMC requirements to encourage reduction in transportation fuel usage. Taken together, the conditions would provide for the public welfare and public necessity by reducing the level

of pollution and greenhouse gas emissions to the benefit of the neighborhood and the City. As conditioned, the Project will be consistent with the aforementioned policies, as well as Policy 5.1.2 of the Air Quality Element, by ensuring that future developments are compatible with alternative fuel vehicles and shift to non-polluting sources of energy. EV project features are also good zoning practices because they provide a convenient service amenity to the occupants or visitors who use electric vehicles and utilize electricity on site for other functions. In addition, the Project promotes usage of public transportation and active transportation to support California's greenhouse gas emission reduction targets. As such, the Project improves habitability for future residents of the Project and minimizes impacts on neighboring properties.

**Mobility Plan 2035.** The project also meets the policies set forth in the General Plan's Mobility Element.

*Policy 2.3: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

*Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*

*Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.*

*Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.*

The Project would provide a combination of ground floor commercial, retail, and restaurant uses and a residential lobby area while improving the streetscape conditions along 8<sup>th</sup> Street, Grand Avenue, and Hope Street, with trees, landscaping, street lighting, and bicycle racks. The Project is also required to provide full width concrete sidewalks as identified by the Downtown Street Standards, and any upgrades necessary to comply with Americans with Disabilities Act (ADA) requirements. Pedestrian access to the commercial components of the Project would be provided along all street frontages, with an outdoor seating area at the corner of 8<sup>th</sup> Street and Hope Street, while access to the residential component of the project is provided via one entrance on 8<sup>th</sup> Street and one entrance on Grand Avenue. The Project also supports Policy 3.3 as it is designated in a Transit Priority Area, and is well-served by public transit, including both rail and bus service. The site is located two blocks from the entrance to the 7<sup>th</sup>/Metro Center Metro Rail Station, which provides rail service to the Metro B, D, A and L Lines and is considered a hub of the regional rail network. In addition, the Project supports Policy 3.8 as it provides short-term bicycle parking on Grand Avenue and Hope Street and long-term bicycle parking located on the subterranean level. As mentioned previously, the Project would include EV parking and charging stations in accordance with LAMC requirements to encourage reduction in transportation fuel usage.

**Central City Community Plan.** The Central City Community Plan, a part of the Land Use Element of the City's General Plan, states the following objectives and policies that are relevant to the Project:

*Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.*

*Objective 1-3: To increase the range of housing choices available to Downtown employees and residents.*

*Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.*

*Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.*

*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 theaters, and other specialty uses to reinforce existing pockets of activity.*

The Project would provide up to 580 residential units, including a mix of studio, one-bedroom, two-bedroom, and three-bedroom units on a site located in the Financial Core District of the Central City Community Plan. In addition, the project would provide 7,499 square feet of ground floor commercial space, consisting of retail and restaurant use fronting 8<sup>th</sup> Street, Grand Avenue and Hope Streets, as well as a residential lobby along 8<sup>th</sup> Street. The Project's residential units and commercial uses align with the Community Plan's overall vision for the Central City as a community which "creates residential neighborhoods; while providing a variety of housing opportunities with compatible new housing." The Project also furthers the Community Plan's vision by improving "the function, design and economic vitality of the commercial districts, and achieving Objective 1-2, Objective 1-3 and Objective 2-1. The Project will contribute new housing choices and increase employment opportunities by providing a mixture of residential unit types for the growing numbers of downtown workers. Furthermore, the ground floor commercial component would provide additional business opportunities within the Community Plan.

In addition, the Project Site is well-served by public transit, including both rail and bus service. The site is located two blocks from the entrance to the 7<sup>th</sup>/Metro Center Metro Rail Station, which provides rail service to the Metro B, D, A and L Lines and is considered a hub of the regional rail network. The Project is also located 0.40 miles southwest from the Los Angeles Sports & Entertainment District (LASED) and approximately 0.73 miles from the Convention Center and will be consistent with the Central City Community Plan's Policy 2-1.2, Objective 2-4 and Policy 2-4.1 by redeveloping a property used solely for parking with a mixed-use residential and commercial development that would add new uses near the LASED and the Convention Center. The Project would contribute to creating a lively environment by activating this part of downtown and fostering a walkable neighborhood proximate to existing businesses, conventions, trade shows, and tourist destinations, and provide a linkage to the other surrounding Central City Districts.

The Project will provide flexibility in commercial spaces allowing for restaurant and retail uses, helping to create an active, 24-hour downtown that will serve the residents and employees of the Financial Core District, as well as visitors. The addition of new commercial uses, as well as up to 580 residential units in the Financial Core District supports the existing retail base by strengthening and creating new residential demand for goods and services, as well as creating synergy between different commercial uses in the Central City Community Plan area. The Project's ground floor uses would contribute to pedestrian activity which would further strengthen the walkability of the neighborhood. The Project will improve the streetscape along 8<sup>th</sup> Street, Hope Street and Grand Avenue lighting, trees, landscaping, and bicycle parking, enhancing the overall pedestrian environment.



Therefore, based on the above, the Project is consistent with the purposes, intent and provisions of the General Plan, and will serve to implement the goals and objectives of the Central City Community Plan.

**16. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The Project site is located within the Downtown Center of the City of Los Angeles, and within the Central City Community Plan area, Financial Core District. The immediate vicinity is characterized by a mix of commercial, restaurant, bar, office, surface parking and high-rise residential uses. The 0.80-acre site is currently developed with a surface parking lot and a four-story parking structure.

Immediately to the north of the Project Site are two parking structures, an eight-story structure along Hope Street and a four-story structure along Grand Avenue. Across Hope Street to the west is a parking structure and business/commercial development (i.e., the Bloc), consisting of a department store, Sheraton Grand hotel, gym cinema, retail and restaurant uses and an office tower at 700 S. Flower Street and 711 S. Hope Street. The property to the east of the Project Site, across Grand Avenue is a 7-story, mixed-use residential/commercial development with a ground floor grocery store. The properties to the south, across 8<sup>th</sup> Street consist of multiple office/commercial buildings, and other residential developments, including a mid-rise residential tower immediately to the southwest, and mixed-use mid-rise buildings and properties to the north adjacent to the Project Site include multi-level parking garages.

The Project would develop the site with a mixed-use building that includes 580 multi-family residential units. The Project will also provide a total of 7,499 square feet of ground floor and commercial space which includes restaurants and retail. The residential uses would be located on levels 3 through 49 and vehicle parking would be provided within three subterranean levels and eight above-grade levels. Residential common indoor and outdoor open space would be provided at the podiums on levels 10, 21, and 35 and would include a gym and fitness center, co-working areas, various lounge areas, dining areas, kitchen, pool, spa, firepit, and multiple outdoor seating areas. Indoor common areas would be located on Levels 3, 11, and 36 and include dog run areas, dog care, fitness mezzanine, and wellness suite. The Project's indoor and outdoor common areas would total 65,193 square feet. The design and proposed mixed-use commercial and residential would complement the existing built environment, contribute to the market-rate housing supply and employment sector within the Financial Core District within the Central City Community Plan of the Downtown area. Outdoor seating for the commercial component would be situated at the southwest corner of the project along 8<sup>th</sup> and Hope Street.

As mentioned above, the project area is highly urbanized, with various commercial and residential uses and other similar mid- to high-rise mixed-use developments. The Project site's proximity to major transit stops, and the site's Regional Commercial designation allows for residential and commercial uses. The Project's ground-floor uses would incorporate transparent and active storefront design on the public streets to create a pedestrian oriented retail environment, while encouraging transit usage. The following Project elements were designed in a manner which is compatible with both existing and future developments in the area:

- A. Building Design. The building's proposed design would be consistent with the design policies set forth in the Citywide Design Guidelines. The building elevations utilizes a

consistent architectural design feature, building materials and changes in building step back from Hope Street to break up massing and create a consistent architectural theme for the development. The parking podium would use a screening design covering the above ground parking levels. At the ground floor, the commercial and residential lobby entrances would utilize a mix of glass and aluminum storefront system, ceramic tile, aluminum panels, pre-finished aluminum frame and cap rail with clear continuous glass, and decorative woven metal screen to provide for a varied texture and transparent for the retail uses and residential lobby area. The podiums also utilize pre-finished aluminum frame and continuous clear, opaque and low e coating glass and partial vision glass with fritted inner layer. The ceramic tile at the ground level would include a glazed finish to soften the façade of the building and create a warm and inviting experience for visitors and residents. The facade of the Project's tower would primarily use glass to allow for natural lighting into the residential units, while the wraparound projecting balconies on most of residential level would provide shade and minimize solar gain throughout the building, highlighting the Project's energy efficiency and sustainability. The tower would also use the same screening design pattern from the podium to provide variety in the tower façade and highlight the outdoor open space and amenities throughout the tower. As mentioned above, the Project provides open space at various podium levels and at different indoor levels of the tower. The open spaces areas within the top of the podiums and the tiered design would help break the façade of the tower and provide unique focal points. Overall, the Project's contemporary architecture complements and enhances the surrounding developments.

- B. Height/Bulk. The Project would reach a maximum building height 592 feet above grade (50-stories). The height of the building is consistent with existing and future development in the immediate area. Around the immediate vicinity of the Project Site are high-rise buildings such as the two mixed-use buildings at 801 S. Grand Avenue (22-stories tall) and 888 S. Hope Street (395 feet tall), and three other high-rise residential towers to the southeast on Olive Street between 8<sup>th</sup> Street and 9<sup>th</sup> Street, 801 S. Olive Street (317 feet tall), 845 S. Olive (350 feet tall, approved, not constructed), and 820 S. Olive (636 feet tall). The proposed building would be comprised of four above-ground tiers which step back from Hope Street and the design serves to articulate the buildings elevation and provide visual interest. The project tiered levels also provide an innovative design solution to accommodate open space within each podium of a high-density development with limited lot area. Additionally, the four-tiered design breaks down the building's massing by providing multiple step backs used to further reduce the bulk and scale of the structure. Overall, the height and bulk of the project would be comparable to that of the high-rise mixed-use developments in the immediate vicinity and contribute to the City's skyline.
- C. Setbacks. The property lies within the Central City Community Plan and the Greater Downtown Incentive Area (ZI No. 2385), in accordance with the Greater Downtown Incentive Area no setbacks are required. However, the Project will comply with the requirements of the Downtown Street Design Guide and the Downtown Design Guide. The Downtown Design Guide requires that adjacent to retail (either on Retail Streets or adjacent to ground floor space designed for retail use in other locations), the building street wall (as defined in Table 6-1) shall be located at or within a few feet of the back of the required average sidewalk width. The building placement along the average sidewalk width along Hope Street and Grand Avenue is placed within the back of the required average sidewalk easements. Additionally, setbacks adjacent to retail, if any, shall be primarily hardscape and may be used for outdoor dining and other commercial activities. The setbacks adjacent to retail include hardscape and therefore complies with the setback requirements.

- D. Off-Street Parking. The project will provide residential and 20 covenanted parking spaces (per two recorded covenant and agreement for off-street parking spaces) for an adjacent building located at 611 West 6<sup>th</sup> Street (per a covenanted and recorded parking agreement) on-site in accordance with the Municipal Code and will be located in three levels of subterranean parking, eight above grade on levels 2 through 9 and four at grade parking spaces. In addition, the Project would include infrastructure for electric vehicle charging stations to facilitate the use of electric vehicles. The Project will also provide long-term and short-term bicycle parking in accordance with the Municipal Code. The long-term bicycle parking will be secure and accessible for residents within the subterranean parking levels, while short-term bicycle parking will be accessible along building frontages at Hope Street and Grand Avenue.
- E. Loading. Any loading or noise-generating back-of-house uses are located away from the street frontages, via a street level loading area located along an internal loading area, accessed from Hope Street. Mechanical equipment and utilities are also appropriately screened within the building and on the building's roof.
- F. Lighting. Implementation of the Project will introduce new light sources, including streetlights, interior building lighting, exterior security lighting, exterior architectural lighting, and individual tenant sign lighting. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site to provide for efficient, effective, and aesthetic lighting solutions which will be shielded to minimize light trespass from the site.
- G. Landscaping. Open space and landscaping for the project is concentrated on the common open space areas throughout the podium levels. The podium open spaces include a multitude of outdoor amenities, including barbeque areas, pool, lounge areas, seating, spa, yoga, and fitness decks and a firepit. Onsite landscaping includes utilizing native shrubs, perennials, and canopy trees and landscaping would also be installed on ground level along 8<sup>th</sup> Street and throughout all the open space levels of the building. The streetscape would also enhance walkability through the provision of shade canopy trees and landscaping along 8<sup>th</sup> Street, Grand Avenue and Hope Street.
- H. Trash Collection. The Project includes an enclosed trash room area on the ground level which would be completely screened from view from adjacent public rights of way. All trash receptacles will be located within the enclosed trash room. Per the LAMC the Project is required to include a recycling area or room for the collection of glass, cans, paper and plastic recyclable materials. Trash and recycling facilities will be kept secure from unauthorized entry.

As described above, the Project consists of an arrangement of buildings and structures (including height, bulk, and setbacks), off-street parking facilities, loading areas, landscaping, trash collection, and other such pertinent improvements that will be compatible with existing and future development on adjacent and neighboring properties. The arrangement of the proposed development is consistent and compatible with existing and future development on neighboring properties.

**17. The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

The Project will result in the creation of new residential and commercial uses on a site that is currently developed with a four-level parking structure and a surface parking lot. The Project would provide indoor and outdoor residential amenities located on Levels 3, 10, 11, 21, 22,



35, and 36. Residential common indoor and outdoor open space would be provided at the podiums on levels 10, 21, and 35 and would include a gym and fitness center, co-working areas, various lounge areas, dining areas, kitchen, pool, spa, firepit, and multiple outdoor seating areas. Indoor common areas would be located on Levels 3, 11, and 36 and include dog run areas, dog care, fitness mezzanine, and wellness suite. Additionally, the Project would provide residential open space areas within private wraparound cantilevered balconies for most of the residential units. The Project's total square footage for the indoor and outdoor common and private areas would total 65,193 square feet.

Lastly, the Project's 4-tiered tower design decreases the building mass and provides additional visual relief for the residents of the adjacent mixed-use development east and west of the project site. The tower's configuration and design will ensure that sufficient natural lighting and air circulation would be provided for the project's residents and surrounding neighbors. Therefore, the project will not result in negative impacts on neighboring properties.

## **B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS**

The City of Los Angeles (the "City"), as Lead Agency, has evaluated the environmental impacts of the 8<sup>th</sup>, Grand and Hope Project by preparing an Environmental Impact Report (EIR) (Case Number ENV-2017-506-EIR / SCH No. 2019050010). The EIR was prepared in compliance with the California Environmental Quality Act of 1970, Public Resources Code Section 21000 et seq. (CEQA) and the California Code of Regulations Title 14, Division 6, Chapter 3 (the "CEQA Guidelines").

The 8<sup>th</sup>, Grand and Hope EIR, consisting of the Draft EIR and Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and impacts of the 8<sup>th</sup>, Grand and Hope (Project), located at 754 South Hope Street, 609 - 625 West 8th Street (Site or Project Site). The Project involves the construction and operation of a 50-story mixed-use high-rise with a height of 592 feet at the top of the parapet roof at residential development with ground floor commercial uses on a 0.80-acre site. The Project would include up to 580 residential units, 7,499 square feet of ground-floor commercial uses, three subterranean and eight above-ground parking, and residential open space amenities.

The Draft EIR was circulated for a 46-day public comment period beginning on November 18, 2021, and ending on January 5, 2022. The Final EIR was then distributed on January 20, 2023. The Advisory Agency certified the EIR on May 26, 2023 ("Certified EIR") in conjunction with the approval of the Project (VTT-74876-CN) which was subsequently appealed in June 2023 to the City Planning Commission. In connection with the certification of the EIR, the Advisory Agency adopted CEQA findings and a mitigation monitoring program. The decision-maker adopted the mitigation monitoring program in the EIR as a condition of approval. All mitigation measures in the previously adopted Mitigation Monitoring Program are imposed on the project through Conditions of Approval, to mitigate or avoid significant effects of the proposed Project on the environment and to ensure compliance during Project implementation.

## **NO SUPPLEMENTAL OR SUBSEQUENT REVIEW IS REQUIRED**

CEQA and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387) allow the City to rely on the previously certified EIR unless a Subsequent or Supplemental EIR is required. Specifically, CEQA Guidelines Sections 15162 and 15163 require preparation of a Subsequent or Supplemental EIR when an EIR has been previously certified, or a negative declaration has previously been adopted and one or more of the following circumstances exist:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

None of the above changes or factors has arisen since the Project approval. There are no substantial changes to the Project, and the Project is substantially the same as the approved Project. No substantial changes have been identified to the surrounding circumstances, and no new information of substantial importance has been identified since the Project. There is no evidence of new or more severe significant impacts, and no new mitigation measures are required for the project.

Accordingly, there is no basis for changing any of the impact conclusions referenced in the certified EIR's CEQA Findings. Similarly, there is no basis for changing any of the mitigation measures referenced in the certified EIR's CEQA Findings, all of which have been implemented as part of the Project's conditions of approval. There is no basis for finding that mitigation measures or alternatives previously rejected as infeasible are instead feasible. There is also no reason to change the determination that the overriding considerations referenced in the certified EIR's CEQA Findings, and each of them considered independently, continue to override the significant and unavoidable impacts of the Project.

Therefore, as the Project was assessed in the previously certified EIR, and pursuant to CEQA Guidelines Section 15162, no supplement or subsequent EIR or subsequent mitigated negative declaration is required for the Project, as the whole of the administrative record demonstrates that no major revisions to the EIR are necessary due to the involvement of new significant environmental effects or a substantial increase in the severity of a previously identified significant effect resulting from changes to the project, changes to circumstances, or the existence of new information. In addition, no addendum is required, as no changes or additions to the EIR are necessary pursuant to CEQA Guidelines Section 15164.

## RECORD OF PROCEEDINGS

The record of proceedings for the decision includes the Record of Proceedings for the original CEQA Findings, including all items included in the case files, as well as all written and oral information submitted at the hearings on this matter. The documents and other materials that constitute the record of proceedings on which the City of Los Angeles' CEQA Findings are based are located at the Department of City Planning, 221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90021. This information is provided in compliance with CEQA Section 21081.6(a)(2).

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at <https://planning.lacity.org/development-services/eir> (to locate the documents, search for the environmental case number). The Draft and Final EIR are also available at the following Library Branches:

- Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071
- Little Tokyo Branch Library, 203 South Los Angeles Street, Los Angeles, CA 90012
- Pico Union Branch Library, 1030 S. Alvarado Street, Los Angeles 90006
- Chinatown Branch Library, 639 North Hill Street, Los Angeles, CA 90012
- Echo Park Branch Library, 1410 West Temple Street, Los Angeles, CA 90026
- Felipe de Neve Branch Library, 2820 West 6th Street, Los Angeles, CA 90057





## **LOS ANGELES CITY PLANNING APPEAL FILING PROCEDURES**

Entitlement and CEQA appeals may be filed using either the Online Application System (OAS) or in person Drop Off at DSC (Development Services Center).

**Online Application System:** The OAS (<https://planning.lacity.org/oas>) allows appeals to be submitted entirely electronically online; fee payment is by credit card or e-check.

**Drop off at DSC:** Appeals of this determination can be submitted in person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.org/development-services/forms>. Public offices are located at:

### **Metro DSC**

(213) 482-7077

201 N. Figueroa Street

Los Angeles, CA 90012

### **Van Nuys DSC**

(818) 374-5050

6262 Van Nuys Boulevard

Van Nuys, CA 91401

### **West Los Angeles DSC**

(CURRENTLY CLOSED)

(310) 231-2901

1828 Sawtelle Boulevard

West Los Angeles, CA 90025

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable Los Angeles Municipal Code provisions.

**An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination.** Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure that DSC staff members have adequate time to review and accept the documents, and to allow appellants time to submit payment.



QR Code to Online  
Appeal Filing



QR Code to Forms  
for In-Person Filing