

ORIGINAL

THE SILVERSTEIN LAW FIRM

A Professional Corporation

215 NORTH MARENGO AVENUE, 3RD FLOOR
PASADENA, CALIFORNIA 91101-1504

PHONE: (626) 449-4200 FAX: (626) 449-4205

ROBERT@ROBERTSILVERSTEINLAW.COM
WWW.ROBERTSILVERSTEINLAW.COM

March 28, 2017

Date: 3/28/17

Submitted in PLUM Committee

Council File No: 16-1462

Item No. 6

Communication From
Appellant Rep

VIA HAND DELIVERY

Los Angeles City Council
PLUM Committee
City of Los Angeles
200 N. Spring Street, Room 395
Los Angeles, CA 90012

Re: Council File No. 16-1462, objections to the Alexan Project, located at 850 S. Hill Street, Los Angeles, APN 5144-017-037; Case Numbers: ENV-2006-6302-MND; ENV-2006-6302-MND-REC1; ZA-2006-6350-YV-ZAA-SPR; VTT 65505; DIR 2015-2976-TDR-SPR

Honorable President Huizar and Members of the PLUM Committee:

I. INTRODUCTION.

This firm and the undersigned represent the Society for the Preservation of Downtown Los Angeles (hereinafter "Appellant" or "SPDTLA"). Please keep this office on the list of interested persons to receive timely notice of all hearings, votes, determinations and official filings related to the proposed approval of a mixed-use building at 850 S. Hill Street, commonly known as the Alexan Project (the "Project" or "Alexan").

Appellant submits this follow-up letter in support of its appeal of the Central Area Planning Commission's ("CAPC") approval of the Project and its determination and findings dated November 15, 2016 and December 20, 2016. This letter addresses arguments in the Applicant's February 22, 2017 letter from Parker Environmental Consultants and February 28, 2017 letter from Liner, LLP ("Liner Letter") as well as the March 24, 2017 Staff Report ("Staff Report").

SPDTLA urges the PLUM Committee to reverse the CAPC's determination and findings and deny the Project application and requested approvals on the grounds that approval of the project under these circumstances violates the California Environmental

Quality Act (“CEQA”)¹ by failing to refer the application to the CRA/LA as lead agency and by proceeding under an addendum (“Addendum”) to a mitigated negative declaration for a 2007 approval of a different project (“MND”). The CRA/LA is the lead agency with jurisdiction to assess the environmental consequences of the Project; the PLUM Committee must grant this appeal, reverse the approvals, and withdraw so the CRA/LA can perform its duties. If the City has jurisdiction (which it does not), it must either prepare a new EIR or a supplemental or subsequent EIR that fully identifies, analyzes, and mitigates or avoids the significant impacts of the Alexan Project prior to any approvals being considered or granted. Guidelines §§ 15162, 15163(a)(2).

II. THE CITY IS NOT AUTHORIZED BY THE MUNICIPAL CODE TO ACT AS LEAD AGENCY FOR PURPOSES OF CEQA REVIEW OF THE ALEXAN.

There can only be one “lead agency” under CEQA. Whenever “a project ‘is to be carried out or approved by more than one public agency, one public agency shall be responsible for preparing an EIR or negative declaration for the project. This agency shall be called the lead agency.’” City of Redding v. Shasta County Local Agency Formation Com. (1989) 209 Cal.App.3d 1169, 1174, quoting CEQA Guidelines § 15050, subd. (a). The agency tasked by law with performing environmental review and preparing the environmental documents for the Project is the CRA/LA. LAMC § 16.05G. Thus, the CRA/LA is the “lead agency” under CEQA. Moreover, the CRA/LA fulfills the definition of lead agency under CEQA by virtue of its expertise and function in approving projects in the Redevelopment Area as well as the primary responsibilities for approval of the project in that the two entitlements requested (TFAR and Site Plan Review) both require the CRA/LA’s review and approval prior to entitlements. Guidelines § 15050(b).

The Staff Report claims that the Department of City Planning “acts initially” on the Project. However the CRA/LA is required to perform the required environmental review and notices in the initial stage of the Project review. Pursuant to the municipal code, a Site Plan Review only proceeds once that review is performed by the CRA/LA.

The Applicant argues that the CRA as listed in LAMC § 16.05G no longer exists as an entity and that this office “has provided no evidence that the City has allowed the successor agency to stand in for the CRA.” (Liner Letter, at p. 5.) However, there is

¹ Unless otherwise specified, CEQA statutory references are to the Public Resources Code or “CEQA.” The CEQA Guidelines will be cited as “Guidelines.”

ample evidence in the record already because the Applicant itself and the City both admit that the CRA/LA's approval of the TFAR will be required for the Project to move forward.

Moreover, it is not within the City's purview or jurisdiction to "allow" or not allow the "successor agency to stand in for the CRA." That is controlled by State law under the Health & Safety Code, which vests in the CRA/LA, as successor to the CRA, the successor duties. See also the CRA/LA's website at <http://www.crala.org/internet-site/index.cfm>, incorporated herein by this reference, prominently stating on the home page: "Notice: ABx1-26 does not abolish the 31 existing Redevelopment Plans. The land-use authorities in the Redevelopment Plans remain in effect and continue to be administered by the CRA/LA". The fact that the Staff Report claims the CRA/LA consulted on the preparation of the Addendum also supports the fact that the CRA/LA is a successor agency to the CRA.²

Applicant's argument that the City cannot delegate environmental review to the CRA/LA is misapplied here. If the Applicant desires to challenge the City's ability to delegate its authority to the CRA/LA, it was required to challenge the ordinance enacting LAMC § 16.05G. The time for doing so has long since passed. Nevertheless, in taking on the lead agency role, the City did not in this instance improperly "delegate" its lead agency status to the CRA/LA but rather the other way around – the City usurped and the CRA/LA in effect unlawfully abdicated its responsibilities under LAMC § 16.05G as lead agency.

In addition, even if the City had a claim to be the lead agency, where two or more agencies have "a substantial claim to be the lead agency, the public agencies may by agreement designate an agency as the lead agency." Guidelines §15051, subd. (d). In effect, the City resolved this issue itself by passing an ordinance enacting LAMC §16.05G that specifies that the CRA is lead agency. The CRA/LA admits the City has yet to legislatively assume the CRA/LA's duties. Thus, both agencies are bound by statutory accord. Also, the delegation case the Applicant cites is distinguishable because

² The Staff Report's assertion at page 13 that the CRA/LA staff "coordinated the review of the project" with the Planning Department staff is called into question by the record in this case. Appellant submitted CPRA documents demonstrating that no such communication occurred between the CRA/LA and the City. Moreover, even if this attempted "blurring of the lines" were factually correct, which it is not, it still would not vest in the City jurisdiction, responsibility and powers that expressly are vested in a different agency.

it deals with a failure of the lead agency's elected decisionmaking body to review and consider an EIR prepared by a lower level Board, not a lead agency designated by statute. Kleist v. City of Glendale (1976) 56 Cal.App.3d 770, 779.

Finally, the City cannot now assert it is the lead agency, since it legislatively acknowledged the CRA's authority to perform that function in LAMC Section 16.05G. Only a proper legislative act can repeal a prior legislative act. The fact that, as the Applicant asserts, the CRA/LA may have sought to transfer its powers to the City is irrelevant because the transfer has not occurred, as admitted by the City, the Applicant and the CRA/LA. (Liner Letter, at p. 5; **Exh. 1** [CRA/LA documents].) **Even if the City purportedly "intends" to transfer authority to itself from the CRA/LA and amend LAMC § 16.05G, it has clearly failed to do so by its own admission.**

Thus, the CRA/LA is the lead agency under CEQA and the Project's Site Plan Review cannot lawfully proceed unless and until the application is properly referred to the CRA/LA to provide the required CEQA notices and review in the first instance. LAMC § 16.05G.

Finally, it appears the City has a pattern and practice of acting as lead agency for Site Plan Review despite the plain language of LAMC § 16.05G. The Staff Report acknowledges as such:

The CRA, as defined by the Los Angeles Municipal Code, has been dissolved. Following its dissolution, the Department of City Planning has assumed the role as the Lead Agency for the review of discretionary projects in designated CRA project areas.

(Staff Report, at p. 12.)

As indicated in its February 28, 2017 letter submitted to this Committee, SPDTLA has filed a Petition for Writ of Mandate and for Declaratory Relief against the City requesting the Superior Court declare that the City's pattern and practice of unlawfully assuming lead agency status violates Site Plan Review law (LAMC § 16.05G). The Staff Report's statement that the City's practice has been to assume the role as the "Lead Agency" in Redevelopment areas is an admission against interest that supports Appellant's claim for relief that the City's actions are, and have been, *ultra vires* and lacking in fundamental jurisdiction. (Staff Report, at p. 12 to 13; see also **Exh. 1** [CRA/LA documents].)

III. SUBSEQUENT REVIEW IS REQUIRED AND APPELLANT HAS MORE THAN MET THE *FRIENDS OF THE COLLEGE* FAIR ARGUMENT STANDARD.

Because the original environmental document is an MND, the substantial evidence test does not apply and the Friends of the College fair argument test applies. Friends of the College of San Mateo Gardens v. San Mateo County Community College District (2016) 1 Cal.5th 937, 953 (“Friends of the College”). The Friends of the College fair argument test is a much lower bar than applied by the City, requiring subsequent review if a project *may* or *might* have significant impacts that were not addressed in the original MND. Id. at 959. The Court stated:

In short, the substantial evidence standard prescribed by CEQA Guidelines section 15162 requires an agency to prepare an EIR whenever there is substantial evidence that the ***changes to a project for which a negative declaration was previously approved might have a significant environmental impact not previously considered in connection with the project as originally approved***, and courts must enforce that standard. . . . It therefore does not permit agencies to avoid their obligation to prepare subsequent or supplemental EIRs to address ***new, and previously unstudied, potentially significant environmental effects***.

Id. (emphasis added).

Appellant has more than met the Friends of the College standard. Appellant has demonstrated with argument and exhibits in its prior submissions to the City³ that the Alexan poses new and more severe significant unmitigated impacts that were not addressed in the 2007 MND and that must be addressed in an EIR, including but not limited to:

- Historic resource impacts, including direct impacts due to vibration/construction, as well as indirect and cumulative impacts on the

³ It should be noted that a large number of arguments presented by SPDTLA were ignored by the Staff Report issued on March 24, 2017.

Historic Core and National Historic District (**Exh. 2** [Public comments]; **Exh. 3** [Broadway Theater and Commercial District National Register Nomination Form].)

- Aesthetic impacts including relating to views of historic resources, shade and shadow, and light and glare impacts.
- Land Use Consistency.
- Traffic impacts.
- Greenhouse Gas Emissions.
- Water supply and infrastructure.

The reasons asserted by the Applicant, the Planning Department, and the CAPC to attempt to justify an Addendum all fail under the law and on the record. Appellants and others have submitted evidence sufficient to warrant subsequent environmental review under Pub. Res. Code Section 21166. Friends of the College, supra, at p. 959.

In addition to the impacts above, there are other flaws in the Addendum and potentially significant impacts due to changes in the Project and conditions that require an EIR and that render the use of an Addendum inappropriate. These include, but are not limited to, the Addendum's failure to properly address impacts related to construction noise. The Addendum's analysis of construction noise is incomplete and understates impacts. Unless properly addressed, construction-related noise may have an adverse impact that requires the preparation of an EIR or MND. More importantly, the Addendum changed noise mitigation to allow four (4) more hours of construction noise. (Addendum, at p. 22.) The conclusion that the new mitigation measure would reduce to a level of insignificance is incorrect and unsupported. The Addendum summarily concluded:

As a result of construction duration changes, Mitigation Measure 51 of the Original Project has been modified to allow structural framing and application of exterior skin facing the Eastern Columbia Tower at the easterly property line to be limited to the hours of 8:00 a.m. to 6:00 p.m. Because technically feasible sound attenuation measures will be required and the modified hours of construction are (1) permissible by the LAMC and (2) would result in a shorter overall construction period, thereby minimizing the duration of construction-related noise impacts (See

Appendix E of this IS/MND Addendum), the revised mitigation measure would ensure a less than significant impact.

(Addendum, at p. III-170.) The deletion of a mitigation requirement provided for in the 2007 MND poses potentially significant impacts and triggers the need for subsequent review.

IV. THE PLANNING DEPARTMENT'S MARCH 24, 2017 STAFF REPORT MISINTERPRETED THE SIGNIFICANCE THRESHOLDS AND IGNORED SIGNIFICANT HISTORIC RESOURCE AND AESTHETIC IMPACTS.

SPDTLA submitted a Historic Assessment report by Expert Historian Charles Fisher ("Fisher Report"). In it, he concludes that the Alexan is incompatible with the adjacent historic resources; adversely impacts historic resources and violates numerous provisions of the Downtown Design Guide ("DDG"), the Historic Downtown Los Angeles Guidelines ("HDTLAG") and with the Secretary's Standards; and would cause significant impacts to adjacent historic resources and the historic district. According to the Fisher Report, and as addressed in Appellant's February 28, 2017 objection letter, the Addendum and its Historic Resources Assessment contained significant errors, and the Project's effects on adjacent historic resources and the Broadway Theater Historic District are "significant and adverse." (Fisher Report, at p. 2.) Thus, Appellant has presented a fair argument that impacts to historic resources would be significant.

In addition, Appellant and others have submitted ample evidence that demonstrates the Project would have significant impacts to aesthetics, including views to historic resources. (Exh. 2.) The Staff Report does not fully address these issues.⁴

⁴ The fact that the Staff Report ignored aesthetic impacts of the project could be because the City Planning Department erroneously believes those impacts cannot be significant under Pub. Res. Code Section 21099. However, Pub. Res. Code Section 21099(d)(2)(B) states: "For the purposes of this subdivision, **aesthetic impacts do not include impacts on historical or cultural resources.**" (Emphasis added.) The Applicant admits the Project site is surrounded on all sides by historic resources. (MLUP, at p. 9; see Addendum, at p. III-75.) Thus, **all Project impacts related to aesthetics, obstruction of views, shading, and nighttime illumination in Sections A.1 through A.4 of the thresholds must be fully analyzed** as they all relate to impacts to historic resources and constitute significant impacts of and from the Project.

Instead, the Report asserts that the Alexan's different design from the Original Abandoned Project does not meet the thresholds of significance for impacts to historic resources because, it states, "height is not a threshold for a significant impact to historic resources under CEQA." (Staff Report, at p. 7.) First, this statement is incorrect under both the thresholds and Secretary Standards, Number 9, which provides that new construction adjacent to historic resources "shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."

Second, the Staff Report ignores the assumptions made in the original 2007 MND on which the City relies for a finding of no significant impact. The 2007 MND specifically stated that the Project *height* posed significant impacts to historic resources even *at the lower height and configuration*. Thus, a 30% greater height is a *per se* significant impact or at the very least, is substantial evidence of a fair argument that the Alexan poses significant impacts that were not addressed in the 2007 MND. This fact alone meets the standard, but in addition, the Fisher Report, along with public comments and the LA Conservancy's letters prove that the Alexan poses significant impacts to historic resources.

Finally, as addressed in Appellant's February 28, 2017 Objection Letter, the HRG Report cannot be considered substantial evidence that no new or more severe impacts will occur.

V. THE CITY CANNOT RELY ON DESIGN REVIEW MITIGATION MEASURES TO SUPPORT THE USE OF AN MND AND ADDENDUM.

When mitigation measures fail to "reduce environmental detriment to a point where clearly no significant effect will result," an MND is not appropriate and an EIR is required. Architectural Heritage Assn. v. County of Monterey (2004) 122 Cal.App.4th 1095, 1120. In order for a project to proceed via an MND (and not an EIR), all project impacts must be mitigated to a level of insignificance prior to circulation of the MND. Pub. Res Code § 21080(c)(2); Guidelines § 15070(b). The Alexan Project's mitigation measures relating to impacts to historic resources do not reduce Project impacts to a level of insignificance, and thus an EIR is required. The City has failed to meet the MND standard regarding its design review mitigation measures (Mitigation Measures 15 and 16) and its approval of the Project relying on the 2007 MND and Addendum is a violation of CEQA. Id.

L.A. CEQA Thresholds Guide, at p. A.1-5, A.2-4, require that appropriate mitigation measures include **reducing** height and mass of a project, not increasing them. Moreover, the intent of the Secretary's Standards 9 and 10 is to minimize impacts to historic resources, not increase or exacerbate them. The 2007 MND disclosed that, **as conditioned** at 21 stories and the chair design provided, the Original, Abandoned Project would not have significant impacts to aesthetics and historic resources.

Both the March 24, 2017 Staff Report and the Liner Letter describe the design review mitigation as allowing only "refinement" of the design approved and conditioned by the City in approving the entitlements at issue here. Explaining further that this measure is to "ensure continued compliance" with design requirements, the City and Applicant have admitted that the Alexan is out of compliance with the Original Abandoned project, which was conditioned on a height that was below the cap of the Eastern Columbia building and a certain design for the tower and placement of bulk in relation to the Eastern Columbia building. If the City's and Applicant's characterization of the design review mitigation is true, the 30% increase in height and 35% increase in floor area cannot be considered "refinement" allowed under existing mitigation.

Put another way, if, as the City and the Applicant claim, the mitigation now incorporated for the Alexan is legal and effective, then the city and the applicant are violating the 2007 mitigation measure because **the 30% increase in height and reconfiguration of the Project to drastically reduce views to and from the Eastern Columbia and the increase in size of the Project to that which out-scales the rest of the historic community cannot be allowed under this mitigation as intended in 2007.** The design changes posed by the Alexan are a blatant violation of the mitigation measure adopted in 2007 and re-adopted because, as addressed above, the Alexan is clearly incompatible with adjacent "historical resources and with the character of its surroundings" in "mass," "scale" and "roof heights". It is a ridiculous assertion that this type of radical change to the project can be described as "refinement" of the original design. The City and Applicant's position is *reductio ad absurdum*. Courts (and the City) should apply the facts to the law to avoid absurd results. Day v. City of Fontana (2001) 25 Cal.4th 268, 272.

The fact that the Applicant claims there are "no impacts" to historic resources by the mammoth project (Liner Letter, at p. 2) is incredible and completely contradictory to the statements relied on in 2007, namely, that in order to avoid significant impacts to historic resources even at a 6-story lower height, design review of minor design modifications was required to prevent the design from deviating too much from the

conditioned design or incorporating façade modifications that might cause incompatibility with resources.

The City is relying on a 2016 historic resources assessment of Project impacts that were not disclosed in the 2007 MND and in fact go beyond the assumptions addressed and conditions imposed in 2007. These impacts are new and more severe than the significant impacts recognized in the 2007 MND, and Measures 15 and 16 do not constitute adequate mitigation of significant impacts threatened by the Alexan Project and undisclosed in the 2007 MND, as addressed in the Fisher Report. Thus, the Alexan's impacts and proposed mitigation measures must be subject to public review in an EIR.⁵ Architectural Heritage Assn., supra, 122 Cal.App.4th 1095, 1120.

Finally, the fact that the City added what it calls "technical" changes to mitigation measures to provide for an "impartial" preservation architect further supports Appellant's position that the mitigation measures for design review are inadequate. Any changes to the measures must be fully vetted in a CEQA process pursuant to a circulated EIR or MND, not an Addendum.

VI. COMPARING THE PROJECT'S SCALE AND HEIGHT TO "DOWNTOWN" AND SOUTH PARK TO AVOID A FINDING OF HISTORIC INCOMPATIBILITY VIOLATES CEQA.

CEQA defines the "environment" as "the *physical conditions* which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, *objects of historic or aesthetic significance*." Pub. Res. Code § 21060.5 (emphasis added). Guidelines § 15064(b) states that the significance of an activity may vary with the setting. Guidelines § 15125(c) provides: "Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project."

The Applicant and the City (in the Addendum and the Findings and now the Staff Report) consistently and inappropriately compare the Project to other buildings "in the downtown area" or in "South Park," buildings which are not adjacent to or neighboring the Project site. In addition, the Applicant repeatedly mischaracterizes the environmental

⁵ An EIR is also required to address the adequacy of the statements made in the HRG 2016 Report and whether any mitigation posed is adequate to reduce impacts to a level of insignificance.

setting of the Project as South Park, when, in fact, the Historic Core is a distinctive and separate area designated by the Central City Community Plan.⁶

As the Fisher Report notes, the 2016 Historic Assessment and Addendum erred in concluding the Project was located in South Park, when in fact the Project is located in the Historic Core, as evidenced by several planning maps. (Fisher Report, Maps 1-7.) The Los Angeles Conservancy commented that while the project site is “near the South Park area,” it is located “within the Historic Core and adjacent to a number of significant historic resources, including the National Register-listed Broadway Theatre and Commercial District,” causing the Conservancy to conclude, “**We strongly believe that the project should be evaluated and designed within its appropriate context, namely the Historic Core.**” (Conservancy February 24, 2017 Letter, at p. 3, emphasis added.) The Conservancy also concluded that the Applicant’s and the City’s attempts to interpret compatibility “within two vastly different neighborhood contexts” has been a cause for confusion and has actually “hampered [the project design’s] compatibility.” *Id.* at p. 3. The Staff Report makes no attempt to properly address these concerns.

The City cannot continue to compare the Project’s height and scale to South Park buildings and other buildings in the downtown area to avoid a finding of incompatibility in terms of land use and historic resource impacts. Such comparison violates CEQA and renders the City’s analysis of impacts faulty, misleading and unsupported. See Guidelines § 15064(b), determination of whether there is a significant impact “calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data.” See also Guidelines § 15144, requiring “best efforts to find out and disclose all it . . . reasonably can” about the environmental impacts of a project, and to make a “thorough investigation.” Guidelines § 15145. The City’s continued use of this demonstrably false and deceptive comparison violates those mandates.

⁶ The City Center/Historic Core is identified as an area that “links together the Central City districts to the west that contain downtown’s mix of business, finance, cultural and sports/entertainment activities to the ‘Markets’ districts to the east that represent the large and vital array of manufacturing, distribution, wholesale, industry-related retail, social service activities; the Civic Center/Little Tokyo to the north; and South Park to the south.” (Central City Community Plan, at p. I-9.)

VII. THE APPLICANT'S ASSERTION THAT THE ALEXAN'S INCREASE IN UNITS IS NECESSARY TO MEET A HOUSING CRISIS IS ERRONEOUS AND IRRELEVANT TO WHETHER SUBSEQUENT REVIEW IS REQUIRED.

The Applicant asserts this Project is required because of the need for housing in downtown. (Liner Letter, at p. 4.) The Applicant cites proposed policies not addressed in the MND or Addendum in support of its assertion that the Project is consistent with land use plans. Id.

The Applicant could have proceeded under the Abandoned Project's entitlements, which provided for 167 units at a time that the MND described as "critical" for the downtown area to increase housing units. There is no evidence in the record that the same circumstances exist and in fact, as Appellants provided in exhibits to its February 28, 2017 Objection Letter, thousands of units are already entitled and coming on-line in the Central City Community Plan ahead of this Project. Moreover, since the Applicant had the ability to build a mixed-use project at this site under previous entitlements, the Applicant's argument is a thinly-veiled attempt to maximize profits at the expense of the historic neighborhood.

Nevertheless, whether the City needs more housing is irrelevant to whether a particular project requires environmental review under CEQA. More importantly, a need for housing does not override environmental protection. If the City wishes to weigh the need for housing against environmental harm, then it must do so under an EIR and issue a statement of overriding considerations that is fully vetted by the public to hold the City accountable for its choice. Such a consideration is not appropriate here, where no such findings can be made.

VIII. SPDTLA HAS A RIGHT TO APPEAL.

The Applicant claims in its February 28, 2017 submissions to PLUM that Appellants do not have a right to appeal under CEQA, citing a recent case issued in the Fourth Appellate District in December, 2016, after Appellants filed their appeals to the PLUM. San Diegans for Open Government v. City of San Diego (4th Dist., Div. 1, 2016) __ Cal.App.5th __ ("San Diegans"). San Diegans is distinguishable from the circumstances here and does not affect Appellant's right to appeal. The argument is an eleventh-hour desperate attempt by the developer to avoid proper review of the issues posed by the Project. It should be deemed waived and rejected.

The Court in San Diegans held the City of San Diego did not abuse its discretion for rejecting a CEQA Appeal under the specific facts of that administrative appeal. By contrast, regarding the Alexan, both appeals were accepted by the Council and Clerk's office. The City of Los Angeles' appeal form clearly interpreted Pub. Res. Code Section 21151(c) broadly to include an addendum:

A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code 21151 (c)].

(Emphasis added.)

By stating, "A CEQA Document", the City's form puts the public on notice that **any** document prepared under CEQA and approved by the APC can be appealed to the City Council if the non-elected decision-making body's determination is not further appealable.

Pursuant to the City's appeal form and the usual practice in front of the City Council, on November 29, 2016, SPDTLA's appeal was personally filed at the City's planning counter. The City accepted our appeal and it was transmitted to the City Clerk, who set up Council File 16-1462. Council File 16-1462 contains SPDTLA's appeal and the appeal of the Homeowners. (**Exh. 3** [Screen shot of LA City Clerk Council File website].) The Planning Department's transmittal of the appeal to the PLUM Committee noted under "Items Appealed", the environmental case number, ENV-2006-6302-MND-REC1. The case was referred to the PLUM Committee, and PLUM set it on the agenda for hearing for February 28, 2017. This Committee's February 17, 2017 Letter to the Applicant, Appellants and "all interested parties," stated that the PLUM Committee would conduct a hearing on the appeal "to consider the following: Mitigated Negative Declaration (MND), Addendum, and related California Environmental Quality Act findings, report from the Central Los Angeles Area Planning Commission (CLAAPC), and appeals . . . from the determination of the CLAAPC in adopting the MND (ENV-2006-6302-MND-REC-1) for the construction of a 27-story (approximately 320-feet above grade), mixed-use residential project. . . ." (**Exh. 4.**)

Several people attended the scheduled February 28, 2017 hearing and submitted speaker cards, including representatives for Appellants and the Applicant. At the hearing, the PLUM stated it would take the submissions under advisement and continued the hearing date to do so. Furthermore, at no time did the Planning Department reject the appeal, and the Planning Department Staff Report did not advise Appellants or this body

that there is no right to appeal. The Council has now taken evidence and accepted the appeal by both SPDTLA and Homeowners. To not hear the appeal on the basis of Applicant's untimely and erroneous argument would be contrary to CEQA, arbitrary and capricious and an abuse of discretion, particularly since the City has always routinely accepted and heard appeals of CEQA addenda.

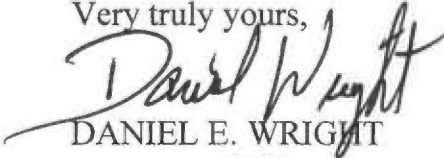
Finally, if the City rejects our appeal now in reliance on San Diegans and in response to the Applicant's arguments, under the reasoning that the City has not adopted or approved an MND for the project, **the City would be admitting it would be in violation of LAMC Section 16.05E4, which states that site plan review cannot be approved unless pursuant to the adoption of a Negative Declaration or a Mitigated Negative Declaration, or certification of an EIR.**

IX. CONCLUSION.

Appellant and others have more than met their burden to demonstrate that an addendum is inappropriate, and subsequent review is required, *inter alia*, under Pub. Res. Code § 21166 and Friends of the College.

The City must comply with CEQA and provide the public and decision makers with adequate information in an EIR regarding the true environmental impacts of the Project, and must propose alternatives and mitigation measures that would lessen those impacts. As our California Supreme Court has held: "If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action. . . . The EIR process protects not only the environment but informed self-government." Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 392.

For all of the foregoing reasons, the Project's approvals must be overturned.

Very truly yours,

DANIEL E. WRIGHT

FOR
THE SILVERSTEIN LAW FIRM, APC

Attachments

cc: CRA/LA (via email and U.S. mail)

EXHIBIT 1

CRA/LA, A DESIGNATED LOCAL AUTHORITY
(Successor Agency to the Community Redevelopment Agency of the City of Los Angeles, CA)

MEMORANDUM

6

DATE: MAY 5, 2016
TO: GOVERNING BOARD
FROM: STEVE VALENZUELA, CHIEF EXECUTIVE OFFICER
STAFF: BARRON MCCOY, CHIEF OPERATING OFFICER
CRAIG BULLOCK, SPECIAL PROJECTS OFFICER
SUBJECT: **LAND USE APPROVAL, 732 S. SPRING STREET – NON-MONETARY ACTION.** Consideration of Mitigated Negative Declaration ENV-2015-2631-MND and approval of a density variation of 49,999 square feet of floor area to allow the construction of a 24-story mixed-use development, located at 732 S. Spring Street in the City Center Redevelopment Project Area.

CT6990
ROPS N/A

RECOMMENDATIONS

That the Governing Board take the following actions:

1. Adopt a resolution certifying that the Governing Board has reviewed and considered the environmental effects of the proposed project as shown in the City of Los Angeles' Mitigated Negative Declaration ENV-2015-2631-MND ("MND"), pursuant to California Environmental Quality Act ("CEQA") Guidelines set forth in California Code of Regulations Section 15096(f) (Attachment C); and
2. Approve a density variation of not more than 49,999 square feet, pursuant to Sections 512.6 and 520 of the City Center Redevelopment Plan, by making the necessary determinations which will permit the development of a 24-story mixed-use development located at 732 S. Spring Street.

SUMMARY

The Developer, 732 Spring, LLC (Developer), is requesting that CRA/LA approve a density variation of not more than 49,999 square feet to allow for the development of a 24-story mixed-use project located at 732 S. Spring Street (Project Site) (see Attachment A, Site Map) pursuant to the City Center Redevelopment Plan. The CRA/LA has discretion under the Redevelopment Plan to approve density variations of less than 50,000 square feet.

Pursuant to Section 14.5.7 of the City of Los Angeles Municipal Code (Municipal Code), the Director of the Department of City Planning (DCP) may approve transfers of less than 50,000 square feet of floor area, following a public hearing which the DCP conducted on November 4, 2015 to approve 49,999 square feet of additional floor area at the proposed project. The Determination Letter was issued on March 8, 2016 by DCP. The appeal period expired on March 23, 2016; no appeals were filed. As a condition of approval, the Developer proposes a public benefit equivalency of approximately \$1,401,181.

The CRA/LA has the discretion under Sections 512.6 and 520 of the Redevelopment Plan to approve density variations for projects if the CRA/LA determines that (1) the application of certain provisions of the Redevelopment Plan would create an unnecessary hardship on the project; or (2) there are exceptional circumstances that apply to the property or project that do not apply generally to other properties having the same standards, restrictions and controls; and (3) permitting a variation will not be materially detrimental to the public welfare, contrary to the objectives of the Redevelopment Plan, or injurious to improvements in the area. These determinations can all be met and a density variation will allow the proposed project to move forward expeditiously.

DISCUSSION & BACKGROUND

Location

The Project Site consists of an approximately 41,306 square foot (.94 acre) right trapezoid shaped parcel, which currently is utilized as a striped surface parking lot. The Project Site is generally bound by S. Spring Street to the west; a four-story residential building (Senator Hotel apartments) to the north; S. Main Street to the east; and a 13-story mixed-use building (Great Republic Life building) to the south.

The Great Republic Life Building is a historic resource, and is listed as City Cultural Heritage Monument #957. This building is not a part of the project, and the Project will not compromise the historic integrity of the adjacent building.

The proposed project, as designed by MVE & Partners Architects (See Attachment B, Project Rendering), is located within the Historic Core of the City Center Redevelopment Project Area, which is in the southwest portion of Downtown Los Angeles, and is comprised of a mix of entertainment, sports, convention, commercial and multi-family residential land uses. The Project Site is located within the boundaries of the Downtown Design Guide which seeks to promote walkability and livability in Downtown neighborhoods by emphasizing pedestrian orientation and street activation. CRA/LA and City staff have reviewed the project and determined that it conforms to the Downtown Design Guide.

Developer Entity

The Owner is 732 Spring, LLC; the Developer is the Holland Partner Group ("Holland"). Holland is a developer of large mixed use projects in the Western United States. The firm's corporate headquarters is in Vancouver, Washington with a regional office in Long Beach, California. Holland has successfully completed two local projects: 1111 Wilshire and Glo Apartments in Downtown Los Angeles and the La Brea Gateway project at La Brea and Willoughby Avenues; it has three large in-fill mixed use projects under construction in Los Angeles, including the 8th & Spring Street high rise project directly to the west. The 732 Spring Street project will be Holland's second high rise tower in Los Angeles. The firm has successfully completed two high rise projects in Seattle, Washington and one high rise project in Portland, Oregon.

Description, Project Context and Project History

The Developer proposes to construct a 24-story, 296,215 square-foot mixed-use tower fronting Main and Spring Streets, between 7th & 8th Streets. The project consists of 411 parking spaces in two (2) levels of subterranean parking and four (4) levels of podium parking; 7,202 square feet of ground floor commercial space for retail and/or restaurant uses; and 20 levels of residential

units. The 308 condominium units consist of 139 studios, 78 one-bedroom units, and 77 two-bedroom units and 14 three-bedroom units.

Residential access will be located along Main and Spring Streets. Residential and commercial parking will be separated from one another. Ground floor retail space, the residential elevator lobby and lounge will be available to residents and their visitors on the ground floor level. Also proposed for the ground floor is vehicle and bicycle parking as well as the garbage and recycling center for the building.

Other residential amenities for the project include an outdoor swimming pool, a lounge, numerous courtyards on various levels and private patios on level six (6) and the rooftop. The open space exceeds City requirements. Parking for this building will be located in two levels of subterranean parking providing a total of 411 parking spaces. Three hundred thirty one (331) parking spaces are proposed for the residential units. The project is not required to provide parking for the retail component, per the Municipal Code, because of its location in the Downtown Business District and because the project's square footage is less than 7,500. Eighty (80) parking spaces will be provided to residents of the Republic Lofts and a connection to the two properties may be constructed at a later day. Access to the parking is proposed from Main and Spring Streets.

The project is also providing code required bicycle parking spaces for residents and visitors. The bicycle parking spaces will be on the two subterranean parking levels as well as on the four (4) levels of above grade parking, an approved deviation from the code.

The parcels for the site encompass a net site area of 41,306 square feet and is zoned C2-4D. The Site's "D" limitations restrict the FAR to 6:1, which limits the Project to 246,216 square feet, unless a density variation is granted. If the requested density variation is granted, the maximum FAR would be 13:1. As designed, the Project's FAR will be 7.22:1.

Findings to Allow Density Variation of 49,999 Square Feet

Section 512.6 of the Redevelopment Plan authorizes the CRA/LA to permit increases of less than 50,000 square feet of floor area by variation, as allowed in Section 520 of the Redevelopment Plan, upon the Governing Board making the two findings below. Based on the facts listed below, staff recommends that the Governing Board make these two Findings and approve the density variation of 49,999 square feet for the Proposed Project.

1. The application of certain provisions of this Plan would result in practical difficulties or unnecessary hardships which would make development inconsistent with the general purposes and intent of the Plan.

Section 512.1(1) of the Redevelopment Plan provides for a 6:1 floor area ratio (FAR) for properties located in the Historic Downtown Development Area, subject to exemptions set forth in the balance of Section of 512, including Section 512.6, which provides for additional floor area by variation for transactions of less than 50,000 square feet. The Developer indicates that limiting development of the Proposed Project to a 6:1 FAR would result in practical difficulties or unnecessary hardships which would make development inconsistent with the general purpose and intent of the Redevelopment Plan. A smaller project would create less opportunities for denser housing, open space, on-site trees and become economically unviable as well as not fully consistent with the goals of the Redevelopment Plan. The density variation will permit the proposed project to provide for the planting of 77 trees placed along the streetscape fronting Main and

Spring Streets as well as on level six (6) and the rooftop lounge. In addition, the project will have 35,149 square feet of open space.

Section 508.1 of the Redevelopment Plan states that the Historic Downtown Core is to "achieve a mixed use of residential, commercial, office, cultural, entertainment and institutional area primarily through the adaptive re-use of the large stock of structures or architectural and historic merit..... The predominant uses shall include both private and governmental office uses, residential uses, theaters, restaurants, local and regional serving commercial and entertainment uses, and other uses compatible with a medium to high density mixed use urban core environment."

The project showcases quality high-density residential condominiums and implements the Redevelopment Plan by providing housing near employment and transit centers. Limiting the project to a 6:1 floor area would result in a substantial reduction in the number of dwelling units which is inconsistent with the objective of the Plan to create high- and medium-density housing in the South Park area.

2. Permitting a variation will not be materially detrimental to the public welfare or injurious to property or improvements in the area or contrary to the objectives of this Plan or the applicable Community Plan.

An Initial Study and Mitigated Negative Declaration ("MND") have been prepared for the Proposed Project, and were adopted by the City Planning Department at a public hearing on November 4, 2015. The MND determined that there would be no significant impacts to the surrounding environment as a result of the project and has set forth mitigation measures designed to ensure the project's compatibility with the immediate and surrounding community. The proposed project, a mixed-use 24-story mixed use development, would be compatible with and appropriate for the existing the Historic Downtown Core neighborhood, which has a mix of residences, neighborhood-serving commercial, and public facilities. The proposed project blends into the setting created by other similar developments and adds to the promotion of Downtown as a highly urbanized, 24/7 Central City.

Community Benefits

Municipal Code Section 14.5.7(A)(3)(b)(1) stipulates that as a condition of approval of the transfer of less than 50,000 square feet of floor area, the transfer shall provide public benefits equivalent in value to the dollar amount otherwise required for a Public Benefit Payment, in conformance with Section 14.5.9 of the Municipal Code. The formula for such a payment is based on the value of the land at sale (if purchase took place within 18 months of the submittal of an application for Floor Area) or a Fair Market Value appraisal. A Public Benefit 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 child care; streetscape improvements; public arts programs; homeless services programs; or public transportation improvements in the area. The Proposed Project's requested density variation of 49,999 square feet results in a public benefit equivalent to approximately \$1,401,181. Of the total Community Benefit Payment, \$700,590 would be deposited into the City's Public Benefit Payment Trust Fund. The balance of \$700,590 payment will be made directly to Skid Row Housing Trust. These funds will be directed towards advancing major objectives of the Redevelopment Plan to eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area through public benefits that will be funded in the surrounding community.

SOURCE OF FUNDS

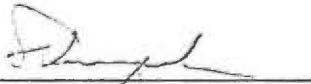
No funding is required for this action.

ROPS AND ADMINISTRATIVE BUDGET IMPACT

The approval of a density variation constitutes a "Land Use Function" as defined under Section 34173(i) of Assembly Bill 1484. On June 20, 2013, the Governing Board approved a resolution authorizing the transfer of all land use plans and functions of the successor agency to the City of Los Angeles pursuant to Section 34173(i) of the Health and Safety Code. To date, the City of Los Angeles has not taken all the necessary steps to formally assume the CRA/LA's land use authority which would effectuate such a transfer. The Department of City Planning has been advised of the actions in this memorandum and concurs with recommendations. This action is a land use approval and will not impose a financial obligation on the CRA/LA for purposes of the ROPS.

ENVIRONMENTAL REVIEW

The City of Los Angeles is the lead agency for the Proposed Project for purposes of the California Environmental Quality Act (CEQA). The City of Los Angeles, acting through its Planning Department, issued an MND on January 6, 2016, and issued its Determination Letter on March 8, 2016. No appeals were filed during the appeal period, which expired on March 23, 2016. The CRA/LA Governing Board's responsibility, as a Responsible Agency in connection with its consideration of residential land use approvals for the Project, is to consider the environmental effects of the Project as shown in the MND prior to any discretionary actions on the Proposed Project.



Steve Valenzuela
Chief Executive Officer

There is no conflict of interest known to me which exists with regard to any CRA/LA officer or employee concerning this action.

ATTACHMENTS

Attachment A – Site Map
Attachment B – Project Renderings
Attachment C – Environmental Resolution

CRA/LA, A DESIGNATED LOCAL AUTHORITY
(Successor Agency to the Community Redevelopment Agency of the City of Los Angeles, CA)

M E M O R A N D U M

3

CT2400
ROPS# N/A

DATE: JUNE 20, 2013

TO: GOVERNING BOARD

FROM: DAVID M. RICCIHELLO, CHIEF EXECUTIVE OFFICER

STAFF: JENNY SCANLIN, SENIOR OPERATIONS OFFICER
JOSH ROHMER, PROJECT MANAGER

SUBJECT: **LOS ANGELES SPORTS AND ENTERTAINMENT DISTRICT (LASED) – NON-MONETARY ACTIONS.** APPROVAL OF THE 8TH IMPLEMENTATION AGREEMENT TO THE DISPOSITION AND DEVELOPMENT AGREEMENT ("DDA") WITH L.A. ARENA LAND COMPANY, INC, FLOWER HOLDINGS, LLC, L.A. ARENA COMPANY, LLC, OLYMPIC GEORGIA PARTNERS, LLC, L.A. LIVE PROPERTIES AND THE CITY OF LOS ANGELES TO MODIFY VARIOUS PROVISIONS OF THE DDA AND ASSIGN CRA/LA'S RIGHTS AND OBLIGATIONS UNDER THE DDA AND SUBSEQUENT IMPLEMENTATION AGREEMENTS TO THE CITY OF LOS ANGELES, DEPARTMENT OF CITY PLANNING
(SD1 / CD 9)

RECOMMENDATION(S)

That the Governing Board Approve and authorize the Chief Executive Officer or designee to negotiate and execute an Eighth Implementation Agreement to the Disposition and Development Agreement ("DDA") by and among the CRA/LA, the City, L.A. Arena Land Company, LLC, ("LandCo") Flower Holdings, L.L.C. ("Flower Holdings") (LandCo and Flower Holdings shall be referred to at times as the "Developer"), and the L.A. Arena Company, LLC..

SUMMARY

The Los Angeles Sports and Entertainment District ("LASED") is located adjacent to Staples Center and the Los Angeles Convention and Exhibition Center in the South Park area of Downtown Los Angeles. (See Attachment A, Location Map) Generally bounded by Olympic Boulevard on the north, Figueroa and Flower Streets on the east, 11th Street and Pico Boulevard on the south, and the 110 Freeway on the west, the Project Site encompasses approximately 28 acres. The Project Site currently includes the LA Live, Nokia Theater, the Convention Center hotels and residential development (Ritz Carlton, Marriott), and Regal Cinema. As-yet to be developed properties include the Figueroa Central, Figueroa South and a portion of the Olympic North sites generally located to the east and north of the Staples Center along Figueroa Street and Olympic Boulevard, respectively. The Project Site was assembled by both the CRA/LA and the Developer initially to provide parking for the Staples Center Arena.

The City of Los Angeles, the CRA/LA and the L.A. Arena Development Company LLC, a subsidiary of Anshutz Entertainment Group, entered into a Disposition and Development Agreement ("DDA") dated October 31, 1997. The DDA was subsequently amended by seven Implementation Agreements.

This Eighth Implementation Agreement (see Attachment B, Draft Eighth Implementation Agreement) modifies the Schedule of Performance to conform to the City of Los Angeles' Development Agreement and remove outdated provisions for design review and development of the remaining undeveloped properties. The Agreement also modifies the LASED Cultural Facility Master Plan to remove any implied cap to payments that can be made to the GRAMMY Museum and relieve the CRA/LA of the administration of the Art Fee and Art Fee compliance monitoring. Additionally, the Eighth Implementation Agreement addresses future collection of the required Open Space Maintenance Fee for Grand Hope Park and Venice Hope Park, removing CRA/LA's collection and administration of such fee. Lastly, the Implementation Agreement allows the CRA/LA to assign its rights and obligations under the DDA to the City of Los Angeles' Planning Department, which already administers the LASED Master Plan and Development Agreement.

DISCUSSION & BACKGROUND

The City of Los Angeles, the CRA/LA and the Developer entered into the DDA in 1997. There have thus far been seven implementation agreements to the DDA, which together with the DDA, contain the terms and conditions governing such items as the acquisition and disposition of land for the Arena; the design, construction and operation of Arena; the future development within the Project; and provisions for public art, jobs outreach, and prevailing wages.

The DDA was amended by a First Implementation Agreement to the Disposition and Development Agreement dated March 26, 1998, and by a Second Implementation Agreement to Disposition and Development Agreement dated October 15, 1998, which required that the L.A. Arena Company submit a Master Plan for the Olympic/Figueroa Properties to the CRA/LA and to the City for review and approval. The CRA/LA approved a Master Plan for the Project through a Third Implementation Agreement to the Disposition and Development Agreement dated March 1, 2002. The Master Plan contemplated a mixed-use development encompassing approximately 4,000,000 square feet including a major convention hotel of at least 1,200 rooms; a second hotel of up to 600 rooms; at least 500 residential units; a live theater of up to approximately 7,000 seats; up to 1,115,000 gross square feet of retail, dining, entertainment and convention uses; up to 305,000 gross square of office space (including medical offices and a sports medicine center); and a health/sports club of up to 120,000 gross square feet. The development also included an open-air plaza to feature year-round events; a site reserved for the future expansion of the Los Angeles Convention Center; and approximately 5,300 parking spaces. A Reciprocal Easement Agreement ("REA") executed March 28, 1998 (and subsequent amendments) tied the different development sites together to allow for parking, access, and management of the spaces.

Additionally, the Third Implementation Agreement to the DDA imposed requirements on the proposed Project including providing publicly accessible open space, hotel development standards and design guidelines, and application of the CRA/LA's 1% Art Fee to the development of an on-site cultural facility with the approval of the CRA/LA. The Third Implementation Agreement to the DDA incorporated the Public Benefits Program agreed to by the Developer that addresses the development of affordable housing, jobs outreach, parks and open spaces, childcare, prevailing wage and living wages for employees of the Project. To date the Developer has complied and in some cases exceeded the requirements of this Program (See Attachment C, Community Benefits Program Compliance).

As the Developer intended to sell or transfer specific components of the Master Plan to other developers ("Project Developers"), a Fourth Implementation Agreement to the DDA was

executed on October 19, 2005 to ensure that the Developer and project developers develop their respective properties consistent with the Master Plan and amended DDAs, and further clarified that a default of any individual project developer was not considered a default of the other developers. In accordance with the DDA, the Developer was required to construct the Arena, the Parking Facilities and all onsite and offsite improvements in connection with the District. The Fourth Implementation Agreement further delineates the requirements of the Developer and the Project Developer and limits their obligations.

The Fifth Implementation Agreement to the DDA, executed on January 19, 2007, amended the Scope of Development of the Master Plan by redefining the development of the hotel parcel as a Convention Headquarters Hotel parcel with 1,000 rooms and 225 condominium units on 54 floors and a height of 660 feet. The amendment defined the quality of the hotels, allowing for two hotels within the hotel parcel and an additional 200 hotel rooms to be built on another site (this reduced the number of hotel rooms from 1,200 on the hotel parcel and 400 elsewhere, and the addition of condominiums on the hotel parcel, and an increase in the number of residential units within the Master Plan area). The approved amendments allowed for a total square footage of development of 5,609,705 square feet, as follows:

Hotel (1,408 rooms) and Ballroom	1,417,000 SF
Retail/Entertainment/Restaurant/Convention Center	1,025,699 SF
Office	341,506 SF
Residential (1,941 units)	2,705,500 SF
Cinema	<u>120,000 SF</u>
	<u>5,609,705 SF</u>

The Sixth Implementation Agreement to the DDA, executed on March 13, 2008, revised the Design Guidelines and the Master Plan to accommodate the LA Central and FIDM Residential projects by allowing for increased height and density as well as broadening the uses within the Master Plan area. The approved amendments allowed for a total square footage of development of 5,945,366 square feet, as follows:

Hotel (1,702 rooms) and Ballroom	1,624,376 SF
Retail/Entertainment/Restaurant/Convention Center	1,048,985 SF
Office	245,800 SF
Residential (2,096 units)	2,818,205 SF
Cinema	120,000 SF
Non-Residential Educational	<u>90,000 SF</u>
	<u>5,945,366 SF</u>

The Seventh Implementation Agreement to the DDA, executed on July 20, 2010, maintained the provisions of the previous agreements, added four additional parcels to the Master Plan area adjacent to the Olympic North Site (See Attachment D, Master Plan Area Map), and modified the Master Plan allocation of office, hotel and residential uses, and the Design Guidelines. The approved amendments allowed for a total square footage of development of 6,290,018 square feet, as follows:

Hotel (1,498 rooms) and Ballroom	1,389,106 SF
Retail/Entertainment/Restaurant/Convention Center Exp'n	1,046,985 SF
Office	847,600 SF
Residential (2,060 units)	2,783,294 SF

Cinema	127,327 SF
Non-Residential Educational	<u>95,706 SF</u>
	<u>6,290,018 SF</u>

All of the land use allocation changes made in the Fifth, Sixth and Seventh Implementation Agreements to the Disposition and Development Agreement have been consistent with the changes the City Planning Commission approved for the Los Angeles Sports and Entertainment District ("LASED") Specific Plan.

Although the majority of properties within the LASED are built out in accordance with the Master Plan, there are still four major sites that have not been developed. As each of the project developments move forward, they will be required to comply with the provisions previously set forth in the DDA and relevant Implementation Agreements which also set forth a number of community benefits and requirements for any development that occurs within the Master Plan area. This active DDA will require a significant level of engagement from CRA/LA staff as projects return for modifications or come in for new approvals over the next five to ten years.

In order to meet AB1X-26's goals of expediently and responsibly winding down the affairs of the Prior Agency, staff recommends assigning the CRA/LA's rights in the DDA and its Implementation Agreements to the City of Los Angeles. The City of Los Angeles is already a party to the DDA and the proposed transfer will relieve the CRA/LA of the administrative burden of managing the various components of the DDA, including art and open space fee collection and disbursement, design and plan review and approval, and compliance monitoring and management. Since many of the responsibilities and review levels of the DDA are duplicative of the work the Planning Department is required to undertake under their Development Agreement for LASED, the assignment will not overly tax their staff and relieves the Developer of reporting and answering to two separate entities.

The City of Los Angeles' Planning Department is amenable to the assignment as evidenced in the attached letter (See Attachment E).

SOURCE OF FUNDS

No CRA/LA funds are required for this action.

ROPS AND ADMINISTRATIVE BUDGET IMPACT

The recommended action is consistent with AB1x26 and AB1484, which directs the Successor Agency to expeditiously wind down the affairs of the former redevelopment agency and to continue to oversee development activities until the contracted work is completed or can be transferred to another party.

ENVIRONMENTAL REVIEW

The City of Los Angeles Planning Department was the Lead Agency pursuant to the California Environmental Quality Act (CEQA) for the preparation of the Environmental Impact Report (EIR) for the project. The City of Los Angeles Planning Commission, on May 23, 2001, and the City Council on September 4, 2001 certified the Final EIR for the Los Angeles Sports and Entertainment District Project, made written findings for each significant environmental effect of the Project and adopted a Statement of Overriding Considerations. The CRA/LA, as the

Responsible Agency under CEQA, reviewed the environmental studies, and on August 17, 2001 made findings and also adopted a statement of Overriding Consideration. The changes to the project proposed in the Seventh Implementation Agreement required environmental analysis to assess any new impacts due to the increased residential density and height. The City, as the Lead Agency, found that there were no new significant impacts from these proposed changes and adopted an Addendum to the Final EIR on November 12, 2009. The CRA/LA, as a Responsible Agency, concurred with the findings contained within the City's Addendum on February 4, 2010. No further environmental review is required because the Eighth Implementation Agreement involves no changes that may result in physical changes in the environment.



David M. Riccitiello
Chief Executive Officer

There is no conflict of interest known to me which exists with regard to any CRA/LA officer or employee concerning this action.

ATTACHMENTS

Attachment A	Location Map
Attachment B	Draft Eighth Implementation Agreement
Attachment C	Community Benefits Program Compliance
Attachment D	Master Plan Area Map
Attachment E	Letter from City Planning

EXHIBIT 2



Clare Eberle <clare.eberle@lacity.org>

Development at 9th and Hill

MacGillivray, Diane <[REDACTED]@neu.edu>

Fri, Nov 13, 2015 at 8:12 AM

To: "Clare.Eberle@lacity.org" <Clare.Eberle@lacity.org>, "Jenna.Monterrosa@lacity.org" <Jenna.Monterrosa@lacity.org>

To our City Leaders:

"Without magic, there is no art. Without art, there is no idealism. Without idealism, there is no integrity. Without integrity, there is nothing but production."

The legendary chronicler of Los Angeles, Raymond Chandler, issued this warning more than 60 years ago. But it is as true today as it was during those heady, hard-boiled, evocative times of the city's former heyday. Chandler captured the mystery and myth our city - the unique magic so many are now rediscovering as downtown reclaims its rightful place at the center of this sprawling region.

The revitalization of Downtown LA is something about which Los Angeles' leaders and city planners should be justifiably proud. Done well, it will be their legacy to the city and gift to generations yet to come. Done well, it will enable a contemporary and sustainable new way to live and work. And it will be a model for urbanization nationwide.

But the vibrancy and attraction of the city must be based on a foundation of distinctive and irreplaceable cultural assets, including its architectural jewels. These assets are drawing visitors and new residents at impressive levels. The restoration of historic theaters, stately bank buildings, and abandoned warehouses provide a critical mass of retail, restaurant and residential venues that cannot be found anywhere else in Southern California. This environment must be preserved. Without the unique differentiation, downtown Los Angeles might as well be Century City or Glendale or Marina del Rey.

The proposed development at 9th and Hill as currently rendered poses an enormous threat to the city's historic core. The proposed building will dwarf and obliterate the Eastern Columbia building, an architectural gem whose artistic integrity has withstood the test of time and taste. It will set a precedent for the disrespect and disregard of the city's historic assets. And once defaced in this way, it can never be recovered.

Rising well above any other structure in the area, the proposed building's generic modernism does nothing to advance the neighborhood atmosphere and feel in the way that the Ace Hotel has done, and the Broadway Trade center once opened, will also do. The behemoth structure exists at its currently proposed scale simply for the sake of production - to generate the maximum amount of revenue for an out-of-state-developer.

It is often said that Los Angeles has little regard for history, most especially its own. In creating an exciting new vision for the city, I hope that you feel your responsibility goes beyond the job you hold today. I hope that, like me and so many of our fellow Angelenos, you see yourself as an advocate for responsible and harmonious growth and a passionate steward of one of the greatest, most innovative cities in the world. Together, let's prove the adage wrong. History will certainly judge us if we do not.

Sincerely,

Diane MacGillivray



Clare Eberle <clare.eberle@lacity.org>

Opposition to Alexan as currently scoped and request for meeting at the Eastern Columbia

Raulee Marcus. [REDACTED]@gmail.com>

Wed, Nov 4, 2015 at 3:16 PM

To: Councilmember José Huizar <huizaronline@gmail.com>, Jose Huizar <jose.huizar@lacity.org>, Eric Garcetti <mayor.garcetti@lacity.org>, Clare Eberle <clare.eberle@lacity.org>, Bryan Eck <bryan.eck@lacity.org>, Nicholas Maricich <nicholas.maricich@lacity.org>

Cc: Patricia Serenbetz <pat.serenbetz@roadrunner.com>, Lawrence Azerrad <lawrence@laddesign.net>, Natalie And Jonathan Firstenberg <nfirst228@gmail.com>, Zoe Howell <brownbettyevents@yahoo.com>, Alex Hertzberg <alex@hertzbergmedia.com>, Nancy Nigrosh <doubleen@mac.com>, Sheila Swanson <nucatl@mindspring.com>, Robert Padnick <robert.padnick@gmail.com>, Maggie Alava <alavamaggie@yahoo.com>, Denis Colomb <denis@deniscolombllifestyle.com>

To: Jose Huizar, Mayor Eric Garcetti, Clare Eberle, Bryan Eck, Nicholas Maricich

From: Raulee Marcus, owner in the Eastern Columbia building, voter, and tax payer

Subject: Alexan Project and degradation of the historic core

Date: Nov 4, 2015

I write to express extreme concern about the Trammel Crow Alexan project and its disregard of the guidelines for the historic core. I also request that you meet with the residents of the Eastern Columbia before the hearing set for mid November so that you can actively relate to our concerns. In this fashion, the scope of the project could modify and then proceed without delays and legal actions.

We are not opposed to the aesthetics of the building or to development in general.

We are opposed to having a huge building blocking our clock tower from the west. We are opposed to having exhaust fumes from the 7 story parking garage that rises to half our building height and which is currently planned 40 feet from our windows.

We are opposed to Trammel Crow ignoring the guidelines of the historic core that states development must be consistent with existing footprints. The Level respected this across Hill street so why should Trammel Crow be allowed to ignore these guidelines on the core side of Hill street? What kind of a precedent are you allowing for other developers who will only be emboldened to ignore the guidelines?

You can see how ugly blocking historic buildings can be if you go to Wilshire Blvd and see the development that blocks the historic Wiltem Theater from the West. Don't let it happen again on your watch!

New York City is pro-development but never allowed development to block the Chrysler or Empire State Buildings. Why would you as guardians of our city encourage developers to ignore guidelines to develop without respect? Do you not feel you have a responsibility to us, those who bought early in the downtown area, and who have been proponents of downtown LA? We do have a 100% voting record and we will make our will known.

We are tax payers and owners. The Alexan project will be filled with renters, not owners. Why should their rights supersede our rights? Why do you care more about them than us?

This requests that you give us a time when you will meet with us here at the Eastern Columbia. This also logs official opposition to the Alexan Project as currently scoped.

Raulee Marcus (rauleem@aol.com).

Sent from my iPad



Clare Eberle <clare.eberle@lacity.org>

9th/Hill property development

amylevinbaum@gmail.com [REDACTED]@gmail.com>

Wed, Nov 4, 2015 at 10:34 AM

To: Clare.eberle@lacity.org, Bryan.eck@lacity.org, Paul.Habib@lacity.org, Nicholas.maricich@lacity.org, jenna.monterrosa@lacity.org

To the above city officials:

We have owned property at the Eastern Columbia building, 849 S. Broadway for the past eight years. We are very concerned about the proposed Alexan development by Trammel Crow Residential.

As currently designed, Trammel Crow's proposed project is incongruous with the Historic Core. While new buildings will indeed continue to be built in the downtown area, we expect that the city will try to keep the historic parts of downtown from being obliterated by new construction.

Unfortunately, the proposed Alexan development would block the iconic Eastern Columbia clock tower from view. Currently, the clock is visible from the 10 Freeway, Hill Street, as well as many parts of downtown. The Eastern Columbia has been featured in several recent commercials, music videos, and movies. It is a unique building due to its Art Deco façade, turquoise terra cotta stone, and golden clock tower. There will never be another Eastern Columbia. It is a CIVIC TREASURE.

Like City Hall, the Griffith Observatory, the Bradbury Building, and Union Station, The Eastern Columbia is an internationally recognized symbol of Los Angeles and the public's ability to actually see and appreciate this beautiful building should not be compromised by another as yet unbuilt high-rise.

What was the point of designating the Eastern Columbia a Los Angeles Historic-Cultural Monument in 1985 if thirty years later the city of Los Angeles allows another building to obscure that which makes the Eastern Columbia a Historic Cultural Monument?

We expect more from the city of Los Angeles. It is the responsibility of the city of Los Angeles to protect its acknowledged cultural monuments and civic treasures for this generation and all future generations.

We would like to register our formal opposition to this Trammel Crow Project.

Thank you for your consideration in this matter.

Sincerely,

Dr. Ronald Baum
Amy Levin Baum

818-730-4149/aneuron77@gmail.com

818-635-8923/amylevinbaum@gmail.com

849 S, Broadway, #508
Los Angeles, California 90014,



Clare Eberle <clare.eberle@lacity.org>

Proposed Alexan development in Historic Core at 9th and Hill (Case no. DIR-2015-2976-TDR-SPR)

kgbrockman@ [REDACTED] <kgbrockman@ [REDACTED]>

Mon, Oct 26, 2015 at 2:23 PM

To: Clare.eberle@lacity.org, Bryan.eck@lacity.org, Paul.Habib@lacity.org, Nicholas.maricich@lacity.org, jenna.monterrosa@lacity.org

Dear Los Angeles City Official:

I am writing to formally log my concern regarding the proposed Alexan development, currently slated to be built on what is currently a parking lot on the northeast corner of 9th and Hill Streets, as well as demanding the environmental impact report (EIR) focusing on a shade and shadow analysis for that corner.

The Alexan is completely out of character with the lower, historic structures surrounding it like the Eastern Columbia and the Broadway Trade Center.

It in no way comports with the Historic DTLA Design Guidelines require. Indeed the guidelines specifically urge "**Encourage the scale of redevelopment to be similar to that of the surrounding Hill Street extant buildings**" Shockingly there is not a clearly defined zone of respect for developments that surround Broadway, that could foreseeably block clear visual access to some of its most iconic structures.

Because the Alexan project is so far afield of the project that had been initially proposed there, a new EIR is not only fair, it is needed. As residents and members of this community, it is something to which we are entitled.

I strongly urge you to move forward with an updated EIR for this proposed project at 9th and Hill.

Thank you for your time and attention to this matter.

Kate Brown



Clare Eberle <clare.eberle@lacity.org>

Petition for the preservation of historic sites and surroundings

Yuri <[REDACTED]@gmail.com>

Tue, Sep 15, 2015 at 4:02 PM

To: Clare.eberle@lacity.org, Bryan.eck@lacity.org, Paul.Habib@lacity.org, Nicholas.maricich@lacity.org

Dear Los Angeles City Official:

I am writing to formally log my concern regarding the proposed Alexan development, currently slated to be built on what is currently a parking lot on the northeast corner of 9th and Hill Streets, as well as demanding the environmental impact report (EIR) focusing on a shade and shadow analysis for that corner.

There has been a recent spate of developments approved in and around the historic core that are cause for concern. The Alexan is hardly the first. The 50-story high rise that is slated for 8th and Olive and the 34-story glass and steel structure pegged for 4th and Broadway are buildings that would not look anomalous in parts of South Park. They are, however, completely out of character with the lower, historic structures near the Eastern Columbia and Historic Broadway.

You are Broadway's first true advocate. There has never been another strip of theaters like it on earth. It is the literal birthplace of motion pictures. Shockingly, however, there is not a clearly defined zone of respect for developments that surround Broadway, that could foreseeably block clear visual access to some of its most iconic structures.

Because the Alexan project is so far afield of the project that had been initially proposed there, a new EIR is not only fair, it is needed. As residents and members of this community, it is something to which we are entitled. We are prepared to make this demand not only of your office, but also carry this message to other city officials, as well as the press.

I strongly urge you to move forward with an updated EIR for this proposed project at 9th and Hill because we believe that what we do today has consequences tomorrow, and we want to help preserve the gem of a downtown that we have in the great city.

Thank you for your time and attention to this matter.

Sincerely,

Yuri Huxley

Resident, investor and business owner in DTLA

310-869-2655

[REDACTED]@gmail.com

849 South Broadway, Apartment 1001
Los Angeles, CA 90014

May 21, 2016

Ms. Jenna Monterrosa
City of Los Angeles
Department of Planning
200 North Spring Street, Room 721
Los Angeles, CA 90012

Re: DIR-2015-2976-TDR-SPR - "Alexan Project"

Dear Ms. Monterrosa:

I am writing in opposition to the proposed twenty-five story glass apartment tower at 850 South Hill Street in the Historic Core of Downtown Los Angeles. I have been a resident of the City of Los Angeles since 1978, a homeowner since 1991, and a home-owning resident of the Historic Core since 2011.

Here are my principal reasons for opposing the proposal.

The proposed project is not compatible with the Historic Core; specifically with the Downtown Design Guidelines.

The scale of the project dwarfs the historic buildings which surround this site: the Hamburger (May Company) Department Store, the Eastern Columbia Building, the Blackstone Building, the May Company Garage, and the Coast Federal (Chase) Building. All were built in the period 1907-1929, when the Historic Core experienced its major growth, which essentially halted with the Great Depression in 1929. Each of the five neighboring buildings has been designated by the City of Los Angeles Cultural Heritage Commission as an Historic-Cultural Monument. All of the designations were made prior to the acquisition of the 850 South Hill property by its current owners.

The Los Angeles Conservancy, which helped to write the Downtown Design Guidelines, is opposed to this project. The City should heed their counsel.

The developer asserts that this project is compatible with the neighborhood, but offers scant evidence to support this claim. At a meeting with neighborhood residents, the developer said that it is compatible by contrasting with existing buildings. This is nonsense.

The proposed project needs a full and current Environmental Impact Report.

I understand that a statement of environmental impact is needed for new projects. The application for this project relies on the environmental statement prepared in 2007 for a project only half the size. Ten years ago, there were essentially no homeowners in the Historic Core; now there are thousands. A project of this magnitude should be supported by a current and thorough study of the impact of its construction and establishment.

As a homeowner in the historic Eastern Columbia Building, I am particularly concerned that the construction of a high rise will damage the terra cotta tile facade of our building. Not only will this be an expense but it will damage the historic character of the building. The facades of the other landmark buildings may also be in danger. These issues need to be addressed.

In addition to these major substantive concerns, there are two other issues I wish to bring to the attention of the planning department and City officials:

The developer has made many false statements in its presentations to the community.

The developer's previous proposals to the Downtown Los Angeles Neighborhood Council and to the community included misstatements. I will mention three: (1) The developer has claimed that this project is not within the Historic Core of downtown. This is just false. (2) The original proposal included five parking levels in the structure, while the developer tried to present this as three levels; when called out on this, they referred to "four and a half" levels of parking, which is not accurate. (3) The developers claimed that their proposed structure was more than fifty feet distant from the Eastern Columbia Building, when in fact their proposal was less than three feet at the nearest point.

This pattern of misstatements should be taken into account by the City. Each assertion by this out-of-town developer should be carefully scrutinized. The City should demand that the developer provide thorough evidence for each claim made.

The recommendation of the Downtown Los Angeles Neighborhood Council (DLANC) should be discounted.

Prior to this planning meeting, the developer made two presentations to the Planning and Land Use committee (PLUC) of the Neighborhood Council; the recommendation of this committee was then considered by the full Neighborhood Council, resulting in a recommendation to approve this proposal.

The City should know that, although the meetings allowed public comment, the discussion by the Committee and the Council never discussed most issues raised by those in opposition. In fact, the objections were dismissed as "nimbyism" by some, rather than being answered. One member of the committee stated that opposition by neighbors should never lead to the rejection of a proposal. The City should also know that members, including the chair of the PLUC, met with the developer privately prior to the meeting. It is clear to me that the DLANC has been "captured" by the developers, rendering their recommendation nearly valueless.

I live and walk in the Historic Core every day. Our concentration of early twentieth-century buildings and theaters is unique in the country. I see the crowds of tourists from all over the world enjoying and photographing the early twentieth century buildings that make this neighborhood so distinctive. I take pride, as an owner of a landmark building, in the condition of our building and our neighborhood. I am excited by the adaptive reuse development in historic buildings as residences, retail, theaters and offices. Moreover, the reinvention of neighborhoods

such as South Park and the Financial District with high-rises and exciting modern architecture is all welcome of the development of the City.

But the proposed glass tower at 850 South Hill detracts from the character of the Historic Core by its incompatibility and its potential for damaging historic landmark buildings.

I urge the City to reject the proposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Don Goldberg".

Donald Y. Goldberg

EXHIBIT 3

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

PH01684210

FOR NPS USE ONLY	
RECEIVED	SEP 12 1978
DATE ENTERED	MAY 9 1979

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

SEE INSTRUCTIONS IN *HOW TO COMPLETE NATIONAL REGISTER FORMS*
TYPE ALL ENTRIES -- COMPLETE APPLICABLE SECTIONS

NAME

HISTORIC
BROADWAY THEATER AND COMMERCIAL DISTRICT
AND/OR COMMON

LOCATION

STREET & NUMBER
300-849 South Broadway

CITY, TOWN
Los Angeles

STATE
California

--- VICINITY OF ---

--- NOT FOR PUBLICATION ---
CONGRESSIONAL DISTRICT
25

COUNTY
Los Angeles

CODE
06

CODE
037

CLASSIFICATION

CATEGORY	OWNERSHIP	STATUS	PRESENT USE	
<input checked="" type="checkbox"/> DISTRICT	<input type="checkbox"/> PUBLIC	<input checked="" type="checkbox"/> OCCUPIED	<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> MUSEUM
<input type="checkbox"/> BUILDING(S)	<input type="checkbox"/> PRIVATE	<input type="checkbox"/> UNOCCUPIED	<input checked="" type="checkbox"/> COMMERCIAL	<input type="checkbox"/> PARK
<input type="checkbox"/> STRUCTURE	<input checked="" type="checkbox"/> BOTH	<input type="checkbox"/> WORK IN PROGRESS	<input type="checkbox"/> EDUCATIONAL	<input type="checkbox"/> PRIVATE RESIDENCE
<input type="checkbox"/> SITE	PUBLIC ACQUISITION	ACCESSIBLE	<input checked="" type="checkbox"/> ENTERTAINMENT	<input type="checkbox"/> RELIGIOUS
<input type="checkbox"/> OBJECT	<input type="checkbox"/> IN PROCESS	<input checked="" type="checkbox"/> YES: RESTRICTED	<input type="checkbox"/> GOVERNMENT	<input type="checkbox"/> SCIENTIFIC
	<input type="checkbox"/> BEING CONSIDERED	<input type="checkbox"/> YES: UNRESTRICTED	<input type="checkbox"/> INDUSTRIAL	<input type="checkbox"/> TRANSPORTATION
		<input type="checkbox"/> NO	<input type="checkbox"/> MILITARY	<input type="checkbox"/> OTHER:

OWNER OF PROPERTY

NAME
Multiple Ownership (see list)

STREET & NUMBER

CITY, TOWN

STATE

--- VICINITY OF ---

LOCATION OF LEGAL DESCRIPTION

COURTHOUSE,
REGISTRY OF DEEDS, ETC.
Los Angeles County Hall of Records

STREET & NUMBER
320 West Temple Street

CITY, TOWN
Los Angeles

STATE
California

REPRESENTATION IN EXISTING SURVEYS

TITLE
California Historic Resources Inventory

DATE
July 1977

DEPOSITORY FOR
SURVEY RECORDS
Office of Historic Preservation

CITY, TOWN
Los Angeles

STATE
California

--- FEDERAL --- STATE --- COUNTY --- LOCAL

7 DESCRIPTION

CONDITION		CHECK ONE	CHECK ONE
<input type="checkbox"/> EXCELLENT	<input type="checkbox"/> DETERIORATED	<input type="checkbox"/> UNALTERED	<input checked="" type="checkbox"/> ORIGINAL SITE
<input checked="" type="checkbox"/> GOOD	<input type="checkbox"/> RUINS	<input checked="" type="checkbox"/> ALTERED	<input type="checkbox"/> MOVED DATE _____
<input type="checkbox"/> FAIR	<input type="checkbox"/> UNEXPOSED		

DESCRIBE THE PRESENT AND ORIGINAL (IF KNOWN) PHYSICAL APPEARANCE

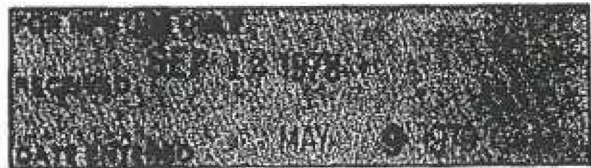
The Broadway Theater and Commercial District is a six-block complex of predominately commercial and entertainment structures done in a variety of architectural styles. The district extends along both sides of Broadway from Third to Ninth Streets and exhibits a number of structures in varying condition and degree of alteration. General styles include a variety of commercial buildings in Classical and Commercial styles, Art Deco, Moderne, and others, and many theaters in more flamboyant designs. The area is highly built up and somewhat homogeneous in streetscape, spotted by several parking lots and a few structures built after 1930. Most of the structures range in construction date from 1894 to 1931, although several have received new facades since the latter date.

Buildings contributing to the character of the district:

1. Bradbury Building (304 S. Broadway): 1893; five-story brick and stone commercial structure designed by George Wyman; has ornate iron balconies and elevators now famous; completely restored (on National Register). NHL
6. Trustee Building (340 S. Broadway): 1905; 4-story brick and concrete shop and office structure by Parkinson & Bergstrom; tiled facade has been altered and part of cornice removed.
8. O.T. Johnson Block (350 S. Broadway): 1895; 3-story brick and iron structure by R.B. Young; Italianate design with fluted columns and arched windows; parapet with ballastrade removed.
9. O.T. Johnson Building (356 S. Broadway): 1902; 7-story brick structure in Romanesque design by John Parkinson; glazed pressed-brick facade with little alteration.
11. Judson-Rives Building (424 S. Broadway): 1906; 10-story reinforced concrete and brick structure by C.R. Aldrich with a granite and terra cotta facade; theater installed on first floor in 1924 and lobby remodeled in 1929.
12. Bumiller Building (430 S. Broadway): 1906; 6-story reinforced concrete structure with terra cotta ornamentation by Morgan & Walls; iron grillwork added to facade.
17. Chester Williams Building (215 W. 5th Street): 1926; 12-story reinforced concrete on steel frame structure by Curlett & Beelman with ornamental bands and a rounded corner, glazed cotta facade designed to look like cut stone.
18. Jewelry Trades Building (220 W. 5th Street): 1912; 8-story concrete structure by Morgan, Walls and Morgan; Romanesque design with terra cotta facade and ornamentation including arched windows and heavy cornice.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



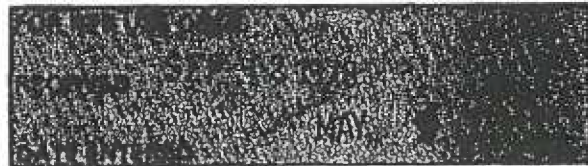
CONTINUATION SHEET

ITEM NUMBER 4 PAGE 1

Property Owners

1. Western Management Corp.
448 S. Hill St., Los Angeles, CA 90013
2. Homero & Belinda Meruelo
322 S. Broadway, Los Angeles, CA 90012
3. Canada Shoe Mexicana, Inc.
304 S. Broadway, Rm. 414, Los Angeles, CA 90012
4. True Acceptance Company
P.O. Box 3201, Hollywood, CA 90028
5. System Auto Parks, Inc. & Phillip L. Cullen
P.O. Box 3201, Hollywood, CA 90028
6. Abe Wiess, et al.
121 N. Flores St., Los Angeles, CA 90048
7. Cornelia R. Possart & Haim Mizrahi
348 S. Broadway, Los Angeles, CA 90013
8. Eli & Lillian Sasson
724 S. Broadway, Los Angeles, CA 90013
9. Eli & Lillian Sasson
724 S. Broadway, Los Angeles, CA 90013
10. Title Insurance & Trust Co.
433 S. Spring St., Los Angeles, CA 90013
11. 424 Broadway Company
409 Santa Monica Blvd., #201, Santa Monica, CA 90401
12. Consolidated Drug
68457 Highway 111, Rm. 7, Palm Springs, CA 92262
13. Intracal Properties, Inc.
P.O. Box 38015, San Francisco, CA 94138
14. Intracal Properties, Inc.
P.O. Box 38015, San Francisco, CA 94138
15. Intracal Properties, Inc.
P.O. Box 38015, San Francisco, CA 94138

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

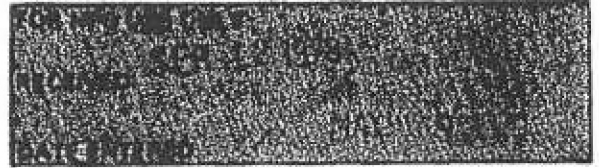
CONTINUATION SHEET

ITEM NUMBER 4 PAGE 2

-
16. Michael Manno 512 S. Broadway, Los Angeles, CA 90013
 17. Herbert E. Edwards, et al.
112 W. 9th St., Los Angeles, CA 90015
 18. Michael Manno 512 S. Broadway, Los Angeles, CA 90013
 19. Michael Manno 512 S. Broadway, Los Angeles, CA 90013
 20. Sherril C. & Dorothy Corwin
8727 W. 3rd St., Los Angeles, CA 90048
 21. Security Pacific National Bank, Tr.
P.O. Box 60802 Terminal Annex, Los Angeles, CA 90060
 22. Bruce Corwin & Irving X. Fuller
8727 W. 3rd St., Los Angeles, CA 90048
 23. Standard Management Co., agents
125 W. 4th St., Los Angeles, CA 90013
 24. David & Sherry Gold
308 S. Hill St., Los Angeles, CA 90013
 25. Western Management Corp., et al.
448 S. Hill St., Los Angeles, CA 90036
 26. First Avenue Realty Company
6030 Wilshire Blvd., Los Angeles, CA 90036
 27. Oceanside Plaza Corp., et al.
448 S. Hill St., Los Angeles, CA 90013
 28. Desmond's Building Company
205 South Broadway, Los Angeles, CA 90012
 29. Holly D. Thomson
1500 Bryant Bldg., Kansas City, MO 64016
 30. Sherrill C. Corwin
8727 W. 3rd St., Los Angeles, CA 90048
 31. Sherrill C. Corwin, et al.
8727 W. 3rd St., Los Angeles, CA 90048

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER

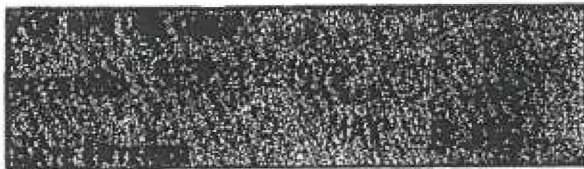
4

PAGE

3

-
32. Title Insurance & Trust Company ✓
433 S. Spring St., Los Angeles, CA 90014
33. Crocker National Bank, tr.
P.O. Box 54427, Los Angeles, CA 90014
34. Downtown Center Building
219 W. 7th St., Rm. 01117, Los Angeles, CA 90014
35. Downtown Commercial Center, Ltd.
219 W. 7th St., Rm. 500, Los Angeles, CA 90014
36. John J. McAndrews & Roger M. Sullivan
1200 Wilshire Blvd., Los Angeles, CA 90017
37. Southern California Petroleum Corp.
4250 Wilshire Blvd., Los Angeles, CA 90005
38. Eli & Lillian Sasson
728 S. Broadway, Los Angeles, CA 90013
39. Massachusettes Life Insurance Co.
4401 Wilshire Blvd., Los Angeles, CA 90010
40. Metropolitan Theater Corp. & S. Broidy
8727 W. 3rd St., Los Angeles, CA 90048
41. Chapman Investment Co.
P.O. Box 17777, Irvine, CA 92713
42. G. Krowl & H.S. Russell
1201 E. California Blvd., Pasadena, CA 91109
43. Jack & Annette Neddleman
120 E. 8th St. Floor 5, Los Angeles, CA 90014
44. Corwin Theater Corp.
8727 W. 3rd St., Los Angeles, CA 90048
45. Jack & Annette Needleman
120 W. 8th St., Floor 5, Los Angeles, CA 90014
46. George Srere Estate Co.
820 S. Broadway, Los Angeles, CA 90014

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

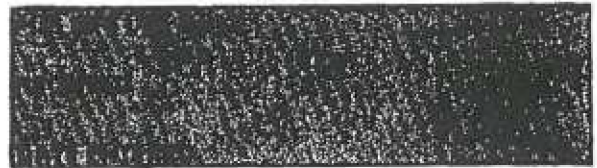
CONTINUATION SHEET

ITEM NUMBER 4 PAGE 4

47. Jack & Annette Needleman
120 E. 8th St., Floor 5, Los Angeles, CA 90014
48. Jack & Annette Needleman
120 E. 8th St., Floor 5, Los Angeles, CA 90014
49. Jack Needleman
120 E. 8th St., Floor 5, Los Angeles, CA 90014
50. Jack & Annette Needleman
120 E. 8th St., Floor 5, Los Angeles, CA 90014
51. Eastern Columbia, Inc.
800 W. 1st St., #200, Los Angeles, CA 90012
52. Eastern Columbia, Inc.
800 W. 1st St., #200, Los Angeles, CA 90012
53. Eastern Columbia, Inc.
800 W. 1st St., #200, Los Angeles, CA 90012
54. United States Steel & Carnegie Pension Fund
801 S. Broadway, Los Angeles, CA 90014
& May Co.
801 S. Broadway, Los Angeles, CA 90014
55. Morton Bowman, et al.
981 Whittier Dr., Beverly Hills, CA 90210
56. Issacs Brothers Co.
9441 Wilshire Blvd., Beverly Hills, CA 90212
57. Prudential Ins. Co. 2049 Century Park East, Rm. 2550
Los Angeles, CA 90067 & Issacs Bros. Co, 888 7th Ave.,
New York, New York 10019
58. Al Stillman 619 N. Canon Dr., Beverly Hills, CA 90210
59. 731 South Broadway Venture
619 N. Canon Dr., Beverly Hills, CA 90210
60. Issacs Bros. Co., 9441 Wilshire Blvd., Beverly Hills, CA 90212
& Dwight & George Whiting, 609 S. Grand Ave., Rm. 617, Los Angeles, CA 90014

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER 4 PAGE 5

61. Arthur Letts, % Security Pacific Bank
P.O. Box 60802 Terminal Annex, Los Angeles, CA 90060
62. United California Bank Trust, et al.
P.O. Box 55011, Los Angeles, CA 90055
63. Hollenbeck Home for the Aged
P.O. Box 55011, Los Angeles, CA 90055
64. Walter J. Thompson Co., Ltd.
3278 Wilshire Blvd., Los Angeles, CA 90010
65. J.A. Mackey, et al. 950 Casiano Rd., Los Angeles, CA 90049
66. J.A. Mackey, et al. 950 Casiano Rd., Los Angeles, CA 90049
67. Tennessee Ravenwood Properties, Inc.
P.O. Box 17, Nashville, Tenn., 37202
68. Prudential Insurance Co. of America
2049 Century Park East, Rm. 2550, Los Angeles, CA 90067
69. Prudential Insurance Co. of America
2049 Century Park East, Rm. 2550, Los Angeles, CA 90067
70. Prudential Insurance Co. of America
2049 Century Park East, Rm. 2550, Los Angeles, CA 90067
71. Prudential Insurance Co. of America
2049 Century Park East, Rm. 2550, Los Angeles, CA 90067
72. Prudential Insurance Co. of America
2049 Century Park East, Rm. 2550, Los Angeles, CA 90067
73. Francis H. Lindley, et al, tr.
530 W. 6th St., Rm. 310, Los Angeles, CA 90014
74. O.H. Churchill Company
448 S. Hill St., #1110, Los Angeles, CA 90013
75. Crocker National Bank, Tr.
P.O. Box 54410, Terminal Annex, Los Angeles, CA 90054
76. Walter J. Thompson Co., Ltd.
3278 Wilshire Blvd., Rm. 302, Los Angeles, CA 90054

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER

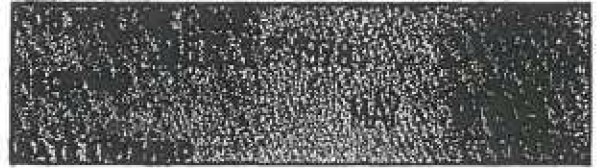
4

PAGE 6

-
77. Franelena, Inc.
441 9th Ave., New York, New York 10001
 78. E.J. Gindi-University of Judaism Foundation
6525 Sunset Blvd., Los Angeles, CA 90028
 79. Paul A. & Lucille K. Weilein
714 W. Olympic Blvd., Los Angeles, CA 90028
 80. Barbara J. Twomey, Admx. for Estate of Belle Young
46-245 E. El Dorado Dr., Indian Wells, CA 92260
 81. Western Management Corp.
5333 McConnell Ave., #525T, Los Angeles, CA 90066
 82. Jack E. Gindi
5333 McConnell Ave., #523-T, Los Angeles, CA 90066
 83. Elinor W. Griffin
445 S. Figueroa St., 36th Floor, Los Angeles, CA 90017
 84. La Mirada Business Property Inc.
1633 26th St., Santa Monica, CA 90404
 85. Title Insurance & Trust Co. et al
888 7 Ave., 25th Floor, New York, NY 10019
 86. Bonita C. Bayless, et al.
888 7 Avenue, New York, NY 10019
 87. Commadore Investment Group
441 9th Ave., #125, New York, NY 10001
 88. 431 S. Broadway Venture
9171 Wilshire Blvd., Los Angeles, CA 90210
 89. 425 South Broadway Realty Company
P.O. Box 754, Beverly Hills, CA 90210
 90. Michael Kamen & Al Stillwell
424 S. Broadway, Rm. 200, Los Angeles, CA 90013
 91. Laura Properties
357 S. Broadway, Los Angeles, CA 90013

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER

4

PAGE

7

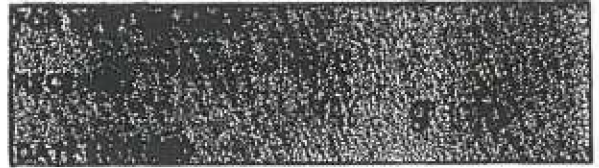
-
92. Security Pacific National Bank, Tr.
P.O. Box 60802, Terminal Annex, Los Angeles, CA 90054
93. J.M. Seiroty 849 S. Broadway, Los Angeles, CA 90014
94. Morton Wexler & Misayo Akita
251 S. Main St., Los Angeles, CA 90012
95. Morton Wexler
251 S. Main St., Los Angeles, CA 90012
96. Helen Cowan
1477 S. Canfield Ave., Apt. 203, Los Angeles, CA 90035
97. Max I. Mosler, et al.
225 S. Rodeo Dr., Beverly Hills, CA 90212
98. Abigail J. Laughlin, et al.
315 S. Broadway, #604, Los Angeles, CA 90013
99. Million Dollar Theater Building
307 S. Broadway, Los Angeles, CA 90013

Parking Lots Within the District:

- A. 312 S. Broadway Central Theater Corporation
820 S. Broadway, Los Angeles, CA 90014
- B. 332 S. Broadway Joshua D. Mason, Admin. for
Deceased Estate of Sarett Russo
1350 Avenue of the Americas, NY, NY 10019
- C. 400 S. Broadway ✓ Allright Cal Inc.
707 Brown Bldg., Austin, Texas 78701
c/o Robert Hudspeth
400 S. Broadway, Los Angeles, CA 90013
- D. 420 S. Broadway Title Insurance & Trust Co.
433 S. Spring St., Los Angeles, CA 90013
- E. 826 S. Broadway Jack & Annette Needleman
120 E. 8th St., Los Angeles, CA 90014
- F. 843 S. Broadway ✓ Eastern Columbia Inc.
800 W. 1st St., #200, Los Angeles, CA 90012

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



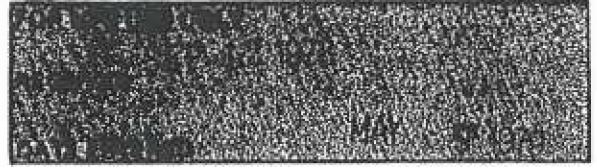
CONTINUATION SHEET

ITEM NUMBER 7 PAGE 2

19. O.T. Johnson Building #2 (510 S. Broadway): 1905; 5-story brick building with pressed-brick facade by R.B. Young; upper windows form almost solid bands, cornice removed and first floor altered.
20. Roxie Theater (518 S. Broadway): 1931; 2-story concrete and brick theater with shops on facade flanks; designed in Art Deco style by J.M. Cooper with floral patterns and grillwork on facade; marquee is new.
21. Cameo Theater (528 S. Broadway): 1910; 2-story brick and concrete theater by A.F. Rosenheim; facade features a large rounded pediment above entrance; remodeled in 1924 and some alterations since then.
22. Arcade Theater (534 S. Broadway): 1910; 7-story office and theater building of reinforced concrete with grey stucco facade by Morgan & Walls; facade shows Renaissance influence with Grecian columns.
23. Arcade Building (540 S. Broadway): 1924; 12-story concrete office structure with two wings connected by inner connection by Kenneth MacDonald; designed to resemble Burlington Arcade in London.
24. Hubert-Thom McAn Building (546 S. Broadway): 1900; 3-story brick building in Italianate style with decorative arched windows by John Parkinson, facade is of pressed brick, alterations include removal of original parapet.
25. Silverwood's Building (558 S. Broadway): 1920; 5-story reinforced concrete building with terra cotta details by Walker & Eisen, first floor alterations.
26. Finney's Cafeteria (217 W. 6th Street): 1904; 4-story brick structure with very plain facade; interior redesigned in 1913 by Plummer and Feil to Dutch motif with tiles by Ernest Bachelder.
27. Walter P. Story Building (610 S. Broadway): 1908; 11-story office building of reinforced concrete by Morgan & Walls; terra cotta facade with heavy cornice, decorative bands, arched windows, etc.
28. Desmond's Building (614 S. Broadway): 1924; 6-story concrete structure in Spanish Baroque styling by A.C. Martin; has a polychrome terra cotta facade with twisting columns, balconies, and ornamental pediment.
29. Broadway Cafeteria (618 S. Broadway): 1928; 2-story Spanish Colonial restaurant of concrete by Charles F. Plummer with terra cotta and wrought iron facade.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



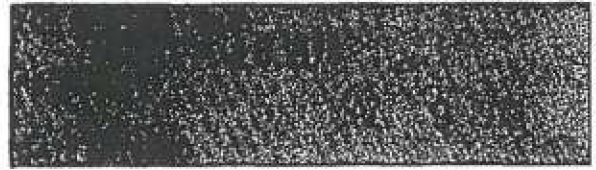
CONTINUATION SHEET

ITEM NUMBER 7 PAGE 3

30. Palace Theater (636 S. Broadway): 1910; 5-story brick and concrete theater and office structure by G. Albert Landsburgh in French Renaissance styling; terra cotta facade features arched windows, heavy cornice, and carved figures.
31. Forrester Building (638 S. Broadway): 1907; 8-story concrete structure by C.F. Whittlesey with terra cotta and stone facade including heavy cornice and arched windows; facade covering on first three stories.
32. J.E. Carr Building (644 S. Broadway): 1908; 8-story concrete structure by R.B. Young with enamelled terra cotta and brick facade featuring heavy cornice and arched windows, facade covering extends across lower four floors.
35. Lankershim Hotel (700 S. Broadway): 1902; 9-story brick hotel by R.B. Young; three sections with stone and pressed brick facade; most ornamentation removed.
36. Yorkshire Hotel (710-14 S. Broadway): 1909; 6-story brick and concrete structure by Parkinson & Bergstrom with facade of pressed brick and terra cotta with tile; has tile cornice and arched windows.
37. Parmelee Building (716 S. Broadway): c. 1907; 6-story concrete structure with facade stuccoed but potentially restorable; cornice and other features removed.
38. Barker Brothers Building (722 S. Broadway): 1909, 7-story concrete and brick structure by R.B. Young; original pressed-brick facade features cornice and lugsills but these were removed and building is now plain but restorable.
40. Globe Theater (744 S. Broadway): 10-story concrete theater and office building with stone and brick facade by Morgan, Walls, & Morgan, and many ornamental features such as arched windows, cornice, and ornamental bands with gargoyles.
41. Chapman Building (756 S. Broadway): 1911, 13-story concrete structure with three sections above first two floors by Ernest McConnell, terra cotta and brick facade has fluted columns, ornamental moldings, heavy cornice, and ornamental bands.
42. Tower Theater (802 S. Broadway): 1927; 4-story theater building with shops on 8th St. side by S. Charles Lee in French Renaissance styling, terra cotta facade includes many details such as urns, stained-glass window, and a large clock tower on corner.
43. Singer Building (806 S. Broadway): 1922; 7-story concrete structure in Italian Renaissance style by Meyer & Holler; has a terra cotta and pressed-brick with little alteration.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER 7 PAGE 4

44. Rialto Theater (812 S. Broadway): 1917, 2-story theater building with pink stucco facade, by O.P. Dennis; has many alterations including removal of original triangular pediment and interior remodeling.
45. Apparel Center Building (814 S. Broadway): 1923; 12-story concrete structure in Spanish Renaissance styling by Walker & Eisen, colorful terra cotta facade with decorative cornice and arched windows; alterations to first floor.
46. Braun Building (820-22 S. Broadway): 1913, 6-story reinforced concrete building by W.J. Saunders, glazed brick and terra cotta facade with some ornamentation and alteration to the first floor interior and exterior.
48. Anjac Fashion Building (830 S. Broadway): 1927; 12-story concrete structure in Gothic Revival styling by Walker & Eisen with terra cotta facade, almost matches the Orpheum Theater next door in style.
49. Orpheum Theater (842 S. Broadway): 1925; 13-story concrete theater and office structures in Spanish Renaissance styling by Schultze & Weaver and G.A. Landsburgh; brick and terra cotta facade includes rows of urns and ornamental bands with brackets.
50. Ninth and Broadway Building (NW 9th & Broadway): 1929; 13-story concrete structure in Zig Zag Moderne style by Claude Beelman with terra cotta facade and very little alteration.
51. Eastern Columbia Building (849 S. Broadway): 1930; 14-story concrete structure in Moderne styling with terra cotta exterior of turquoise with gold trim; designed by Claude Beelman with a large clock tower that is still operative.
54. May Company (SW 8th & Broadway): 1906; 5-story department store of concrete with terra cotta ornamentation, designed by A.F. Rosenheim in Classical styling with a heavy cornice and decorative garlands; the major addition on the south side of the structure (1929) is of the same style with two additional stories; there have been many alterations to the interior.
55. Merritt Building (301 W. Eighth Street): 1914; 5-story concrete structure with stone facade by the Reid Brothers (San Francisco); Italian Renaissance style with Ionic columns and heavy cornice; many alterations on first two levels.
57. Issacs Building (737-47 S. Broadway): 1913; 8-story concrete structure with Gothic details and a glazed and molded terra cotta facade; has a large facade covering on most of the northern half and other alterations to first floor.
59. Cheney Block (731 S. Broadway): 1913; 4-story brick and concrete structure with a remodeled facade of the 1940's; blends very well with the district.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

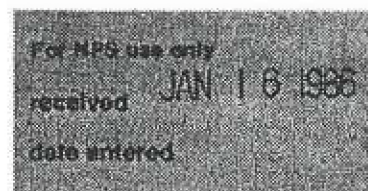
ITEM NUMBER

7

PAGE 5

60. Woolworth's (719 S. Broadway): 1920; 3-story reinforced concrete structure by Weeks & Day, facade altered to an Art Deco-Zig Zag Moderne style in 1941 and building next door added to it.
61. United Building (703 S. Broadway): 1920; 12-story concrete theater and office building by Weeks & Day in Spanish Renaissance styling with patterned brick and terra cotta ornamentation including Moorish windows and a rounded building corner.
62. Bullock's (641 S. Broadway): 1906; 7-story brick structure by Parkinson & Bergstrom with terra cotta facade details including a heavy cornice; has several additions and the interior has been completely remodeled.
63. Bullocks-Hollenbeck (639 S. Broadway): 1912; 10-story brick and concrete structure by Morgan & Walls with a brick and terra cotta facade that is almost identical to Bullocks next door.
68. Mailing's (617-19 S. Broadway): 1930; 2-story concrete structure in French Renaissance design by S. Charles Lee that was the southern flank of the Los Angeles Theater next door; alterations to street level.
69. Los Angeles Theater (615 S. Broadway): 2-story theater of concrete and terra cotta in French Renaissance design by S. Charles Lee; features fluted columns with urns, eagles, etc.; has a new marquee.
72. Norton Building (601-5 S. Broadway): 1906; 6-story brick and concrete office building; the facade was completely altered in 1940 with new design but the structure blends very well with the district and is not out of the time period.
73. Wood Brothers Building (315 W. 6th Street): c. 1922; 3-story concrete and brick structure with terra cotta decoration which blends very well with the district.
74. Swelldom Building (NW 6th and Broadway): 1920; 3-story retail building in Italian Renaissance design by Pierpont and Walter S. Davis, reinforced concrete with glazed terra cotta facade; cast iron roof trim removed.
75. Metropolitan Annex (553 S. Broadway): c. 1923; 6-story concrete and brick structure with terra cotta details; alterations to the street-level frontage.
77. Hartfields (537 S. Broadway): 1931; 6-story reinforced concrete and brick structure in Art Deco styling; very little alteration.
79. Reed's (533 S. Broadway): 1931; 2-story reinforced concrete structure features a "marble" facade with reliefs; little apparent alteration.

United States Department of the Interior
National Park Service
National Register of Historic Places
Inventory—Nomination Form



Continuation sheet

Item number 7

Page 5A

Addendum: Description of additional buildings comprising the Bullock's complex.
The buildings are all united by historical function and internal circulation.

Buildings comprising the complex are coded under the number (62) assigned to the original Bullock's Building in the National Register nomination. The added letters are assigned in the order in which the buildings were acquired by Bullock's as part of its department store operations. The earliest expansion was into the adjacent Hollenbeck Building, already designated as #63 in the district nomination. Subsequent additions, in order, are as follows:

62A. Pease Building (1906) Hudson/Munsel

Originally used as a furniture store, this 8 story building was acquired by Bullock's in 1917. A bridge was constructed over St. Vincent Place and a tunnel beneath at that time to connect the building with the Hollenbeck Building (#63).

62B. Eshman Building (1909) Morgan/Walls

This 7 story building in characteristic Beaux Arts 3-part vertical division became part of Bullock's in or before 1919.

62C. Bridge (1921) ----

The bridge was constructed to connect the Eshman Building with the original Bullock's Department Store. It spans St. Vincent Place, connecting the upper 6 stories of both buildings, creating internal circulation between the two on all levels. Stylistically it repeats the design of the earlier Bullock's building, creating the appearance of a skillfully integrated addition. A tunnel below St. Vincent Place also connects the two buildings.

62D. Gennet Building (1922) Parkinson/Hubbard

The next addition to the Bullock's complex was this tall, slender Beaux Arts building--10 stories tall and only two bays wide. The lower two stories were remodeled in 1934 to create the appearance of a unified design with the adjacent Mackey Building.

62E. Hart Building/Hart '24 (1924) Parkinson/Parkinson

This building duplicated the nearby Gennet Building in height, width and styling. It is now indistinguishable from the adjacent 1928 Hart Building.

62F. Hart Building/Hart '28 (1928) Parkinson/Parkinson

The design of the earlier 1924 Hart Building was expanded to fill out the block by adding five more bays on the Hill Street side and four bays on Seventh Street in Beaux Arts styling. Fenestration is dominated by 3-part Chicago windows.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Inventory—Nomination Form**

For NPS use only
received *11/4/86*
date entered

Continuation sheet

Item number 7

Page 5B

62G. Mackey Building (1934) Parkinson/Parkinson

The upper six stories of the Mackey Building repeat the appearance of the adjacent Gennet Building. The lower two floors are Moderne in styling; this design was expanded across the base of the Gennet Building, uniting the two buildings visually in 1934. Internal circulation exists between the buildings.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER 7

PAGE 6

80. Broadway Interiors (529 S. Broadway): c. 1928; 5-story brick and concrete building with a flat facade and some remaining terra cotta ornamentation; street-level frontage modification.
83. Remick Building (517-19 S. Broadway): c. 1902; 6-story brick structure with decorative facade including arched windows and twisting columns between window openings.
84. Fifth Street Store (501-515 S. Broadway): 1927; 11-story concrete structure with terra cotta and brick facade by A.E. Curlett; a minor amount of ornamentation has been removed.
85. Metropolitan Building (315 W. Fifth Street): 1913; 9-story concrete and terra cotta structure by Parkinson & Bergstrom with ornamental features including a heavy cornice, etc.; major alteration to street-level frontage on both sides.
88. Wilson Building (431 S. Broadway): c. 1909; 3-story brick and concrete structure with massive alteration in 1932; facade ornament includes heavy cornice with brackets, columns topped by capitals, and floral designs on the surface.
90. Broadway Mart Center (401-23 S. Broadway): 1913; 10-story concrete structure by Parkinson & Bergstrom with a brick and terra cotta facade including many ornamental details.
91. Nelson Building (355 S. Broadway): 1897; 7-story brick and plaster structure originally by Frank Van Trees with a mass of ornamentation; alterations removed all ornament and left flat plaster surface with a rounded corner; still blends with the district although very plain now.
94. Karl's (341-45 S. Broadway): 1903; originally a four-story brick structure by A.M. Edelman, the building was altered to two stories but much of the original terra cotta decoration remains.
98. Grand Central Market (315 S. Broadway): 1897; Broadway elevation is a 6-story brick structure with terra cotta ornamentation including heavy cornice and arched entrance; large facade covering now hides much of it; Hill St. addition by Thornton Fitzhugh in 1905 is 8 stories with little alteration to it, mostly concrete with brick.
99. Million Dollar Theater (307 S. Broadway): 1917; 12-story concrete theater and office building by A.C. Martin in Spanish Renaissance design, theater interior by W.C. Woollett; much ornamentation with little alteration. (Nominated to National Register in September, 1977.) *NR*

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER 7

PAGE 7

Nonconforming Intrusions Detracting From the Integrity of the District:

2. Blackstone Building (318-322 S. Broadway): c. 1907; originally a 5-story and basement reinforced concrete and brick structure, now three stories with much alteration and most ornament removed; is potentially restorable. ✓
3. Shannon Building (326 S. Broadway): c. 1912; 2-story brick structure with an arched facade of stucco recently applied. ✓
4. Joe's Coffee Shop (328 S. Broadway): 1-story cement structure of recent vintage.
5. MGM Photographia (336 S. Broadway): 1-story cement structure in gold with an awning; very recent origin.
7. Judson's (346-8 S. Broadway): c. 1907; 1-story brick building divided in half; facade completely cluttered with signs. ✓
10. Licha's (412 S. Broadway): 1-story food stand of cement blocks, very contemporary.
13. A & M Sportswear (438 S. Broadway): 1-story cement structure of contemporary design.
14. (Food Stand) (444 S. Broadway): one-story structure of contemporary style.
15. California Imports (446 S. Broadway): 2-story cement block structure of contemporary origin.
16. Gebhard Building (450 S. Broadway): c. 1900; 2-story brick structure by R.B. Young with a new facade that completely covers the original. ✓
33. Cliftons Cafeteria (648 S. Broadway): c. 1916; 4-story brick building with arched windows and reliefs on facade; facade now completely covered by metal grate but should be relatively easy to remove. ✓
34. Haas Building (660 S. Broadway): 1914; a 12-story concrete structure originally with a mass of terra cotta ornamentation by Morgan, Walls, & Morgan; alteration in 1974 left the building completely "modernized" with typical tile and glass facade.
39. Parking Structure (730 S. Broadway): c. 1967; multi-level parking structure of concrete and steel in contemporary design with several stores below.
47. "Burgers" (828 S. Broadway): one-story, concrete-block structure of recent origin.
52. Maggy's Clothing (847 S. Broadway): 1-story cement block structure of recent origin.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**



CONTINUATION SHEET

ITEM NUMBER 7

PAGE 8

53. Wig House (845 S. Broadway): 1-story cement block structure of contemporary origin.
56. Hartfield's (749 S. Broadway): c. 1912; 4-story brick structure with a very modern stucco facade. ✓
58. Rowley Building (735 S. Broadway): c. 1908; 4-story brick building with a very modern "marble" facade. ✓
64. Hoffman Building (635-37 S. Broadway): c. 1906; 4-story brick business building, although facade is fairly new it is potentially restorable and still similar to the original. ✓
65. Baker Building (633 S. Broadway): c. 1911; 4-story brick structure with a newer facade that blends very well with the district. ✓
66. C.H. Baker's (629 S. Broadway): c. 1911; northern half of the Baker Building, 4-story brick and concrete structure with facade completely remodeled in contemporary design. ✓
67. Kress Building (621 S. Broadway): c. 1919; 5-story concrete and brick structure with new facade. ✓
69. Eastman's (611 S. Broadway): 1930; part of the northern flank of the Los Angeles Theater, 2-story concrete with facade of recent vintage. ✓
71. Young Age Shop (609 S. Broadway): 1930; part of northern flank of Los Angeles Theater, 2-story concrete with new facade. ✓
76. Barry's (543 S. Broadway): c. 1901; 4-story brick structure with 2 modern facades, 1 on each side. ✓
78. Emperor Building (535 S. Broadway): c. 1903; 5-story brick structure with a contemporary, flat facade. ✓
81. Reeves Building (525 S. Broadway): 1903; 5-story brick building by John Parkinson with a glazed metal and synthetic stone facade; very little original ornament which included a balcony and pediment was removed but facade is potentially restorable. ✓
82. "Levis" (521 S. Broadway): c. 1903; 2-story brick structure with a flat stucco facade of recent origin. ✓

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET

ITEM NUMBER

7

PAGE 9

86. Newberry's Annex (443 S. Broadway): 4-story brick structure with flat, modernized facade.
87. Zody's (437 S. Broadway): c. 1942; 3-story structure with a flat stucco facade of recent design.
89. Wise Shop #2 (425 S. Broadway): 3-story brick building with flat, modernized facade.
92. Zobel Building (351 S. Broadway): c. 1912; 6-story brick structure with a new flat stucco facade. ✓
93. (Building) (347-9 S. Broadway): c. 1908; 2-story brick structure with a flat stucco facade of recent origin. ✓
95. Wise Shop (337-39 S. Broadway): c. 1900; 2-story (originally 4) brick structure with facade stuccoed over the original ornamentation removed. ✓
96. Jacoby Brothers Building (333 S. Broadway): c. 1900; originally a 4-story brick structure with decorative cornice, this building was altered to two stories and some of the facade stuccoed flat; it is still similar to the original however and blends somewhat with the district. ✓
97. Broadway Market (329 S. Broadway): c. 1900; 3-story brick building that originally had an ornamental facade including arched window openings and a heavy cornice; altered in recent years to a flat stucco facade. ✓

8 SIGNIFICANCE

PERIOD	AREAS OF SIGNIFICANCE -- CHECK AND JUSTIFY BELOW			
<input type="checkbox"/> PREHISTORIC	<input type="checkbox"/> ARCHEOLOGY-PREHISTORIC	<input type="checkbox"/> COMMUNITY PLANNING	<input type="checkbox"/> LANDSCAPE ARCHITECTURE	<input type="checkbox"/> RELIGION
<input type="checkbox"/> 1400-1499	<input type="checkbox"/> ARCHEOLOGY-HISTORIC	<input type="checkbox"/> CONSERVATION	<input type="checkbox"/> LAW	<input type="checkbox"/> SCIENCE
<input type="checkbox"/> 1500-1599	<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> ECONOMICS	<input type="checkbox"/> LITERATURE	<input type="checkbox"/> SCULPTURE
<input type="checkbox"/> 1600-1699	<input checked="" type="checkbox"/> ARCHITECTURE	<input type="checkbox"/> EDUCATION	<input type="checkbox"/> MILITARY	<input type="checkbox"/> SOCIAL/HUMANITARIAN
<input type="checkbox"/> 1700-1799	<input type="checkbox"/> ART	<input type="checkbox"/> ENGINEERING	<input type="checkbox"/> MUSIC	<input checked="" type="checkbox"/> THEATER
<input checked="" type="checkbox"/> 1800-1899	<input checked="" type="checkbox"/> COMMERCE	<input type="checkbox"/> EXPLORATION/SETTLEMENT	<input type="checkbox"/> PHILOSOPHY	<input type="checkbox"/> TRANSPORTATION
<input checked="" type="checkbox"/> 1900-	<input type="checkbox"/> COMMUNICATIONS	<input type="checkbox"/> INDUSTRY	<input type="checkbox"/> POLITICS/GOVERNMENT	<input type="checkbox"/> OTHER (SPECIFY)
		<input type="checkbox"/> INVENTION		

SPECIFIC DATES 1893 BUILDER/ARCHITECT various

STATEMENT OF SIGNIFICANCE

The Broadway Theater and Commercial District is a six-block thoroughfare containing the vestiges of the Los Angeles theater and commercial center developed from the early 1890's to the early 1930's. The area is significant not only for this activity, but also for the high concentration of important architectural creations which document the development of both commercial and theater growth in Los Angeles, and the evolution of progressive design for these types of structures.

Prior to the turn of the century the commercial center in Los Angeles was located near the intersection of Spring and First Streets. The area of Broadway below Third Street was primarily residential until small businesses located there in the 1890's. Construction of the new city hall in the late 1880's on Broadway between Second and Third Streets was a primary impetus in turning the commercial district southward to take advantage of the close proximity of municipal headquarters. By 1900, several large business structures including the Bradbury Building (1893), the Grand Central Market (Homer Laughlin Block in 1897), the Nelson Building (Grant Building in 1897), and several smaller blocks, the O.T. Johnson Block (1895), the Hubert-Thom McAn Building (1900), and the Jacoby Brothers store (1900) began to change the Broadway skyline and pulled the business center further south.

The 1900-1910 period was a decade of rapid development in Los Angeles, as well as all of southern California. Broadway was a perfect example of this growth along just one street. Although many small blocks were built to about Sixth Street at this time, including the large O.T. Johnson Building (1902), Finney's Cafeteria (Gebhart Building in 1904), the Reeves Block (1903), the Remick Block (1902), Karl's Shoes (1903), and a number of small brick structures, the dramatic turning point in this development was the announcement that Hamberger's (now the May Company) was going to build a large department store at Broadway and Eighth Street, then generally considered too far south of the business district. This statement by one of the city's largest retailers was met with skepticism by local businessmen. However, as construction of Hamberger's began in 1905, many investors followed suit so that before the end of the decade a number of important structures were added to the district including the Trustee Building and O.T. Johnson Building #2 in 1905, the Judson-Rives, Bumiller, Hoffman, Norton, and Bullock's buildings in 1906, the Blackstone, Forrester, and Parmelee buildings in 1907, the W.P. Story and J.E. Carr structures in 1908, and the Barker Brothers and Wilson Buildings in 1909.

9 MAJOR BIBLIOGRAPHICAL REFERENCES

Assessment Records of Los Angeles County, 1900-1940. Los Angeles County Archives.

Building Permits. Department of Buildings & Safety. Los Angeles City Hall.

Greene and Behrendt Photograph Collections. Los Angeles County Museum of Natural History Archives. (see continuation sheet)

10 GEOGRAPHICAL DATA

ACREAGE OF NOMINATED PROPERTY 27+

QUADRANGLE NAME			QUADRANGLE SCALE				
UTM REFERENCES <u>8 20</u>							
A	<u>11</u>	<u>38,98,90</u>	<u>3,76,83,4,0</u>	B	<u>11</u>	<u>38,98,90</u>	<u>3,76,82,5,0</u>
	ZONE	EASTING	NORTHING		ZONE	EASTING	NORTHING
C	<u>11</u>	<u>38,92,0,0</u>	<u>3,76,73,4,0</u>	D	<u>11</u>	<u>38,91,0,0</u>	<u>3,76,78,0,0</u>
E				F			
G				H			

VERBAL BOUNDARY DESCRIPTION

(See Continuation Sheet)

LIST ALL STATES AND COUNTIES FOR PROPERTIES OVERLAPPING STATE OR COUNTY BOUNDARIES

STATE	CODE	COUNTY	CODE
STATE	CODE	COUNTY	CODE

FORM PREPARED BY

NAME / TITLE

Tom Sitton Curatorial Assistant

ORGANIZATION

Los Angeles County Museum of Natural History

DATE

October 20, 1977

STREET & NUMBER

900 Exposition Blvd.

TELEPHONE

213-746-0410 x 241

CITY OR TOWN

Los Angeles

STATE

California

12 STATE HISTORIC PRESERVATION OFFICER CERTIFICATION

THE EVALUATED SIGNIFICANCE OF THIS PROPERTY WITHIN THE STATE IS:

NATIONAL

STATE

LOCAL

As the designated State Historic Preservation Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the National Park Service.

STATE HISTORIC PRESERVATION OFFICER SIGNATURE

Kenneth M. Ellison

TITLE

SHPO

DATE

SEP 7 1978

FOR NPS USE ONLY

I HEREBY CERTIFY THAT THIS PROPERTY IS INCLUDED IN THE NATIONAL REGISTER

William J. Montoya

DATE

5/9/79

KEEPER OF THE NATIONAL REGISTER

TEST: *Bill Tolovich*
CHIEF OF REGISTRATION

DATE

May 9, 1979

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

FOR NPS USE ONLY
RECEIVED
SEP 12 1978
MAY 9 1979
DATE ENTERED

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET

ITEM NUMBER 8 PAGE 1

The Lankershim Hotel (1902) and the Yorkshire Hotel (J.D. Hooker Building in 1909) were built during this period to help support the district. By 1910, Broadway was the commercial and retail thoroughfare of the city.

In the next decade still more new structures appeared which increased retail trade and office space in the district. The Chapman Building and Baker Building (1911), the Jewelry Trades Building and Bullock's-Hollenbeck (1912), the Metropolitan, Issacs, Cheney, and Broadway Mart Center buildings (1913), and the Merritt Building (1914) provided additional growth in this area. Clifton's Cafeteria (Boos Brothers Restaurant in 1916) was also built at this time, as were many of the theaters that eventually made Broadway the theatrical center of Southern California.

The real estate and building boom of Southern California in the 1920's is probably best illustrated in the further development of Broadway during this decade. A number of notable structures including Silverwood's, Woolworth's, and the Sweldom Building (1920), the Singer and Wood Brothers buildings (1922), the Metropolitan Theater Annex and the highly colorful Apparel Center Building (originally the Wurlitzer Building) in 1923, Desmond's (1924), the Chester Williams Building (1926), the Anjac Fashion Building and the Fifth Street Store (1927), and the Ninth & Broadway and Eastern-Columbia buildings (1929-30) were all completed during this decade. Along with the Broadway Cafeteria (1928) and several more theaters, the district as it appears today was substantially complete by 1930. Other than Hartfield's and Reed's (1931), the only major changes since that time have been a number of facade alterations and the addition of several intrusions which include parking structures and small food stands.

As the commercial center of the Southland, the Broadway district continued to function in this capacity until well after World War II. As suburban shopping centers began to increase in number and popularity, major retailers along Broadway found it convenient to place regional stores in these centers to attract customers living a good distance from downtown Los Angeles. Along with other factors, the increase of these shopping centers diminished the trade that once came to Broadway. The area now serves a clientele that, for the most part, resides in and near the downtown area.

The development of Broadway as a commercial district coincides with its emergence as the theatrical center for the Southland. At the turn of the century the major theaters of Los Angeles (the Merced, Grand Opera House, and the Burbank) were located along Main Street. In 1903 the Mason Opera House (now demolished) opened on Broadway and began the accelerated development of the theatrical district on this street. The Orpheum (now the Palace),

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET

ITEM NUMBER 8 PAGE 2

Clune's (now the Cameo), and the Pantages (now the Arcade) opened in 1911 and were the first theaters to locate within the present district. Following these pioneers were the Morosco (Globe) in 1912, the Rialto in 1917, the Million Dollar in 1918, Loew's State Theater (United Building) in 1920, the Metropolitan in 1923, the new Orpheum in 1925, the Tower in 1928, the Los Angeles in 1930, and finally the Roxie in 1931. Of these, only the Metropolitan has since been razed.

The importance of the theater district in the home of the motion picture industry is clearly evident. The theaters provided drama, comedy, and vaudeville presentations until full-length motion pictures became popular. Thomas Tally, Sid Grauman, Oliver Morosco, and others vied for the honor of city impresario as the theaters along Broadway became larger and more numerous. Theater architecture was more flamboyant than commercial styles and the influx of theatrical structures helped to provide variety for the Broadway streetscape. In all, theater development along Broadway provided a major source of revenue and a location for premieres for the movie industry, an important form of entertainment for Southern Californians, and a variety of architectural designs which gave a unique character to Broadway.

The zenith of the Broadway theater district was in the 1920's. In 1922 the Egyptian Theater was built on Hollywood Boulevard in the midst of movie studios, and in 1926 Sid Grauman's Chinese Theater opened further down the street. The major theater chains were now beginning to establish Hollywood as the center for motion picture theaters. Although several Broadway theaters were built as late as 1931, the new trend had already been clearly established.

It is surprising now that so many of the theaters built on Broadway have survived even though the theatrical center moved so long ago. The structures that remain on Broadway, typically flamboyant in design both inside and out, are still viable movie houses from both economic and functional standpoints. As older theatrical sections of many cities have since been leveled for new use, the Broadway theater network continues to provide motion picture entertainment in buildings that are remarkably intact considering their uninterrupted use over so many years.

Architecturally, the Broadway district contains some of the best examples of commercial and theater architecture in Southern California. The Bradbury Building, Million Dollar Theater, and Eastern-Columbia Building are well-known, and the Los Angeles Theater is considered to be the best example of theater architecture in the entire Southland. The district is represented by a number of important styles including American Commercial, Sullivanesque, Italianate (O.T. Johnson Block), Romanesque (Jewelry Trades Building and the

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET

ITEM NUMBER 8 PAGE 3

O.T. Johnson Building), Spanish Renaissance (United Building, Apparel Center Building, Million Dollar Theater, etc.), French Renaissance (Tower and Los Angeles theaters), Italian Renaissance (Merritt Building and Swelldom Building), Spanish Baroque (Desmond's), Gothic Revival (Anjac Fashion Building and Issacs), Art Deco (Woolworth's, Hartfield's, and the Roxie Theater), and Zig Zag-Moderne (Eastern-Columbia and Ninth & Broadway buildings), among others. Architects from New York (Schultze & Weaver), Seattle (B. Marcus Priteca), Oakland (Weeks & Day), and San Francisco (G. Albert Landsburgh, and Kenneth MacDonald, and the Reid Brothers), as well as local architects Morgan & Walls, R.B. Young, George Wyman, A.F. Rosenheim, A.C. Martin, A.M. Edelman, Meyer & Holler, J.M. Cooper, C.R. Aldrich, Walker & Eisen, Curlett & Beelman, S. Charles Lee, C. F. Whittlesey, and others have contributed to the architectural integrity of the street. Although not always consistent in scale, Broadway as a whole contains some of the best examples of commercial and theater architecture in Southern California that could possibly be integrated in such a compact area.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET

ITEM NUMBER 9

PAGE 1

Insurance Maps of Los Angeles, California. New York: Sanborn Map Company, 1906-37.

Los Angeles Daily Journal, October 4, 1895, 8; October 11, 1895, 8; May 7, 1897, 4; October 22, 1900, 4; November 2, 1900, 4.

Los Angeles Evening Express, November 21, 1927, p. 8.

Los Angeles Herald, January 1, 1894, p. 7.

Los Angeles Times, 1894-1977. (Articles on specific buildings are too numerous to list. See individual site survey sheets available at the California State Office of Historic Preservation or at the Natural History Museum of Los Angeles County.)

Exhibitor's Herald, April 28, 1928, p. 86; May 12, 1928, p. 123.

Southwest Contractor & Manufacturer, May 11, 1912, p. 40; June 1, 1912, p. 40; June 1, 1912, p. 22; April 3, 1915, p. 8.

Southwest Builder & Contractor, October 17, 1919, p. 17; January 9, 1920; May 17, 1920, p. 10; July 16, 1920, p. 11; July 23, 1920, p. 16; August 27, 1920, p. 13; September 3, 1920, p. 18; February 3, 1922, p. 29; November 3, 1922, p. 14; January 21, 1924, p. 12; July 4, 1924, p. 50; December 26, 1924, p. 51; May 20, 1927, p. 56; July 1, 1928, pp. 41-3; June 26, 1929, p. 56; May 31, 1929, p. 57; July 12, 1929, p. 67; February 14, 1930, p. 19; February 28, 1930, p. 5; May 2, 1930, p. 45; May 30, 1930, p. 25; January 24, 1941, p. 30; April 25, 1941, p. 40.

Architectural Digest, V, no. 2 (1926), 82-3; VI, no. 3 (1928), 31-3; VII, no. 2 (1929), 125; VIII, no. 2 (1931), 56-9.

Architect & Engineer, September 1911, pp. 34-50; May 1918, pp. 80-6; February 1923, pp. 60-70; June 1926, pp. 18-20, 67; July 1927, p. 77.

Boyarski, Bill & Nancy, "Picture Palace Splendor," Westways, September, 1971, pp. 11-17+.

"In Winter's Outdoor Land," Sunset, XX, n. 3 (January, 1908), 212-58.

Owen, J. Thomas, "The Theater in Los Angeles," Los Angeles County Museum Quarterly, Vol. I, no. 3-4 (Winter-Spring, 1962-3), 32-7.

Western Architect, Vol. 33, no. 9 (September, 1924), 105-6.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE



**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET

ITEM NUMBER 9 PAGE 2

Gebhard, David, & Winter, Robert. A Guide to Architecture in Southern California. Los Angeles: Los Angeles County Museum of Art, 1965.

Hall, Ben. The Best Remaining Seats. New York: Branhall House, 1961.

Hill, Laurence L. La Reina: Los Angeles in Three Centuries. Los Angeles: Security Trust and Savings Bank, 1929.

Scott, J.E. Los Angeles, the Old and the New. Los Angeles: Western Insurance News, 1911.

Souvenir Office and Buildings Directory. Los Angeles: Howes & LeBerthnon, 1903.

Vision. Los Angeles: Sun Drug Company, c. 1926.

Works Projects Administration. Los Angeles: A Guide to the City and its Environs. New York: Hastings House, 1941.

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

FOR NPS USE ONLY	
RECEIVED	SEP 12 1978
DATE ENTERED	MAY 9 1979

CONTINUATION SHEET

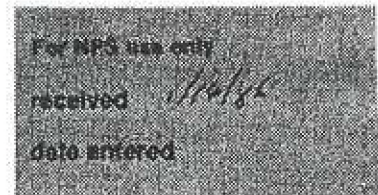
ITEM NUMBER 10

PAGE 1

An irregular area in the downtown business district generally following both sides of Broadway beginning at the intersection of Broadway and Third Street, extending 186' eastward along Third St., 170' southward, 44' westward, 79.6' southward, 23' eastward, 363' southward to Fourth St., then 39' westward to Frank Court, to Fifth St., then 31' westward, then 100' southward, then 35' eastward then 165' eastward to Spring St., then 120' southward on Spring St., then 117' southward to Sixth St., then 15' westward, then southward along an alley to Ninth St., then westward along Ninth St. to a point 165' west of Broadway, then 236' northward to Eighth St., then 212' Eastward along Eighth St., then 116' northward then 50' westward, then 470' northward to 7th St., then 10' eastward, then 80' northward to Sixth St., then 125' northward, then 138' eastward, then 80' northward to Sixth St., then 29' eastward to Lindley Place, then north along Lindley Place to Fifth St., then 200' northward, then 165' westward to Hill St., then 41' northward, then 165' eastward, then 120' northward, then 42' westward, then 39' eastward, then 80' northward, then 16' westward, then 39' northward, then 42' eastward, then 80' northward, then 16' westward, then 122' northward to Fourth Street, then 39' eastward, then 123' northward, then 40' westward, then 240' northward, then 166' westward to Hill St., then 121' northward, then 132' eastward, then 120' northward to Third St., then 194' eastward to the original point.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Inventory—Nomination Form**



Continuation sheet

Item number 10

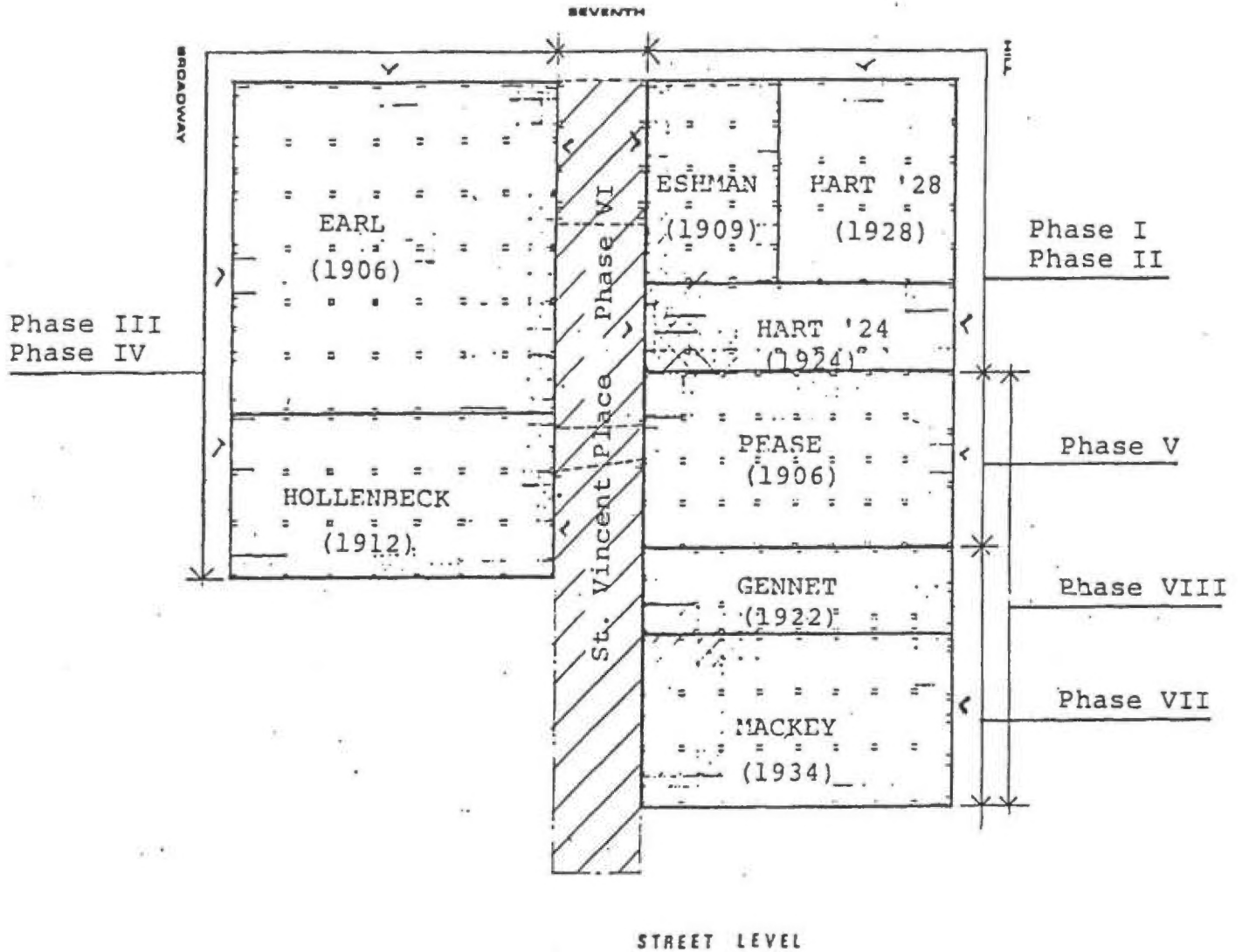
Page 1

VERBAL BOUNDARY DESCRIPTION (Revised 12/26/85)

(Note: All changes in direction are at a right angle from the previous direction.)

The boundary encompasses an irregular area in the downtown business district generally following both sides of Broadway beginning at the southeast corner of the intersection of Broadway and Third Street, extending 185.53' eastward along Third Street, then approximately 161' southward, 44.4' westward, 79.6' southward, 23' eastward, approximately 365' southward to Fourth Street, then continuing 60' southward across Fourth Street to Frank Court, then continuing southward along Frank court to the south side of Fifth Street, then 40' westward, then 100' southward, then 40' eastward, then 260' southward, then 165' eastward to Spring Street, then 119.6' southward on Spring Street, then 165.18' westward, then 120.5' southward to Sixth Street, then continuing southward 60' across Sixth Street, then continuing southward along an alley to the northern edge of Ninth Street, then westward approximately 163' along Ninth Street, then continuing 80' across Broadway, then continuing 165' westward, then approximately 235' northward, then 159.5' westward to Hill Street, then 363.5' northward along Hill Street to Eighth Street, then 212' eastward along Eighth Street, then 185.6' northward, then 50' westward, then approximately 550' northward to intersection of the northern edge of Seventh Street and St. Vincent Court, then approximately 158.5' westward to Hill Street, then 312' northward along Hill Street, then 138.4' eastward to St. Vincent Court, then 74.44' northward, then 138.37' westward, then 125' northward, then 158.34' eastward, then 140' northward to northern edge of Sixth Street at its intersection with Lindley Place, then northward along Lindley Place to northern edge of Fifth Street, then continuing approximately 201' northward, then 165.18' westward to Hill Street, then 41.87' northward, then 165.18' eastward, then 120.4' northward, then 12.82' westward, then 0.9' northward, then 13.71' westward, then 39.34' northward, then 42.41' eastward, then 79.56' northward, then 16.19' westward, then 0.14' northward, then 79.32' westward, then 123.6' northward, then 78.99' eastward, then 60' northward across Fourth Street, then 40.09' eastward, then approximately 124' northward, then 39.96' westward, then approximately 239' northward, then 165.88' westward to Hill Street, then 121.34' northward, then 132.5' eastward, then 120.36' northward to Third Street, then approximately 279' eastward to the point of beginning.

ST VINCENT SQUARE

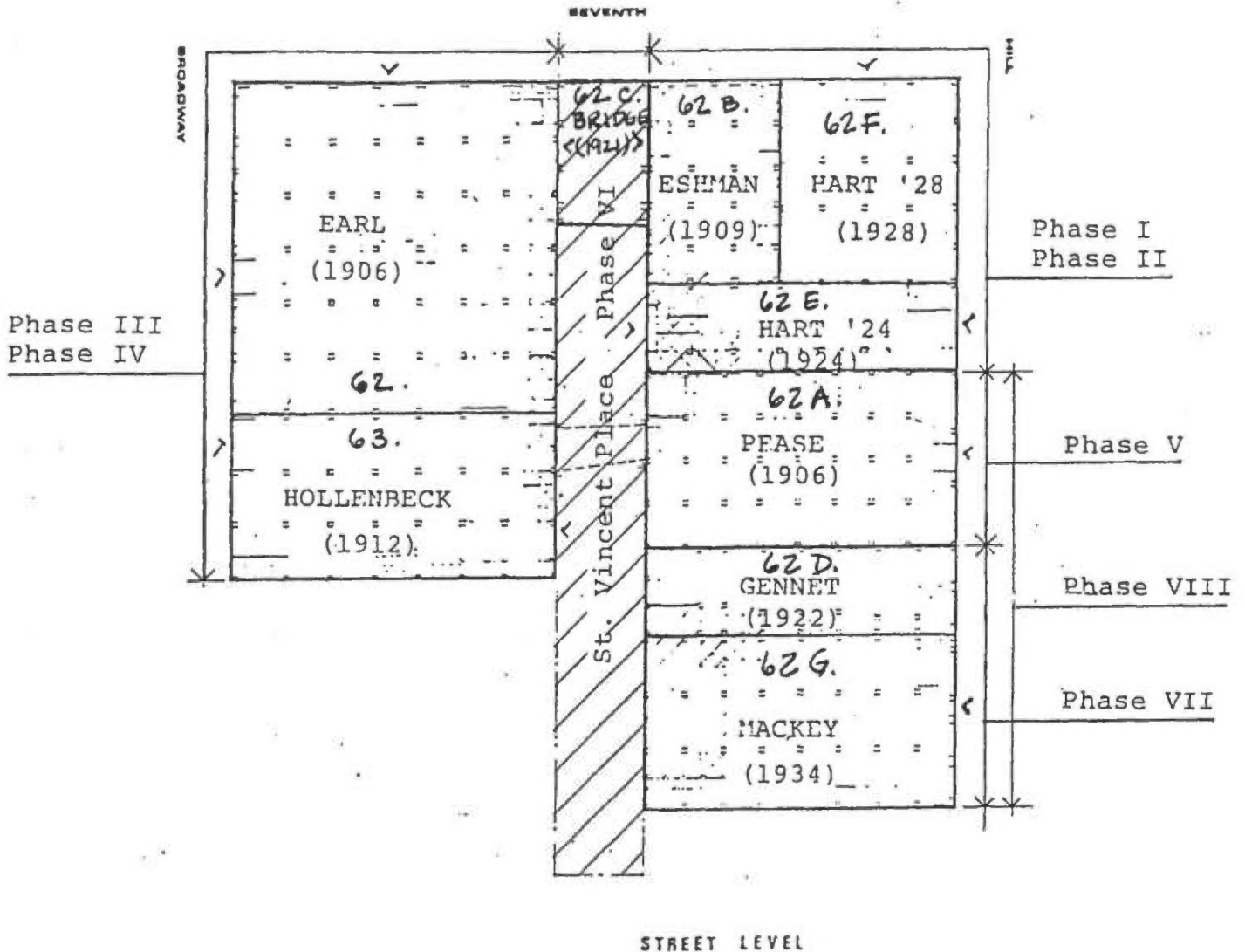


ARCHITECTS

MACKY	Parkinson / Parkinson
GENNET	Parkinson / Hubbard
PEASE	Hudson / Munsel
HART '24	Parkinson / Parkinson
HART '28	Parkinson / Parkinson
ESHMAN	Morgan / Walls
Earl	Parkinson / Bergstrom
HOLLLENBECK	Parkinson / Bergstrom

ST VINCENT SQUARE

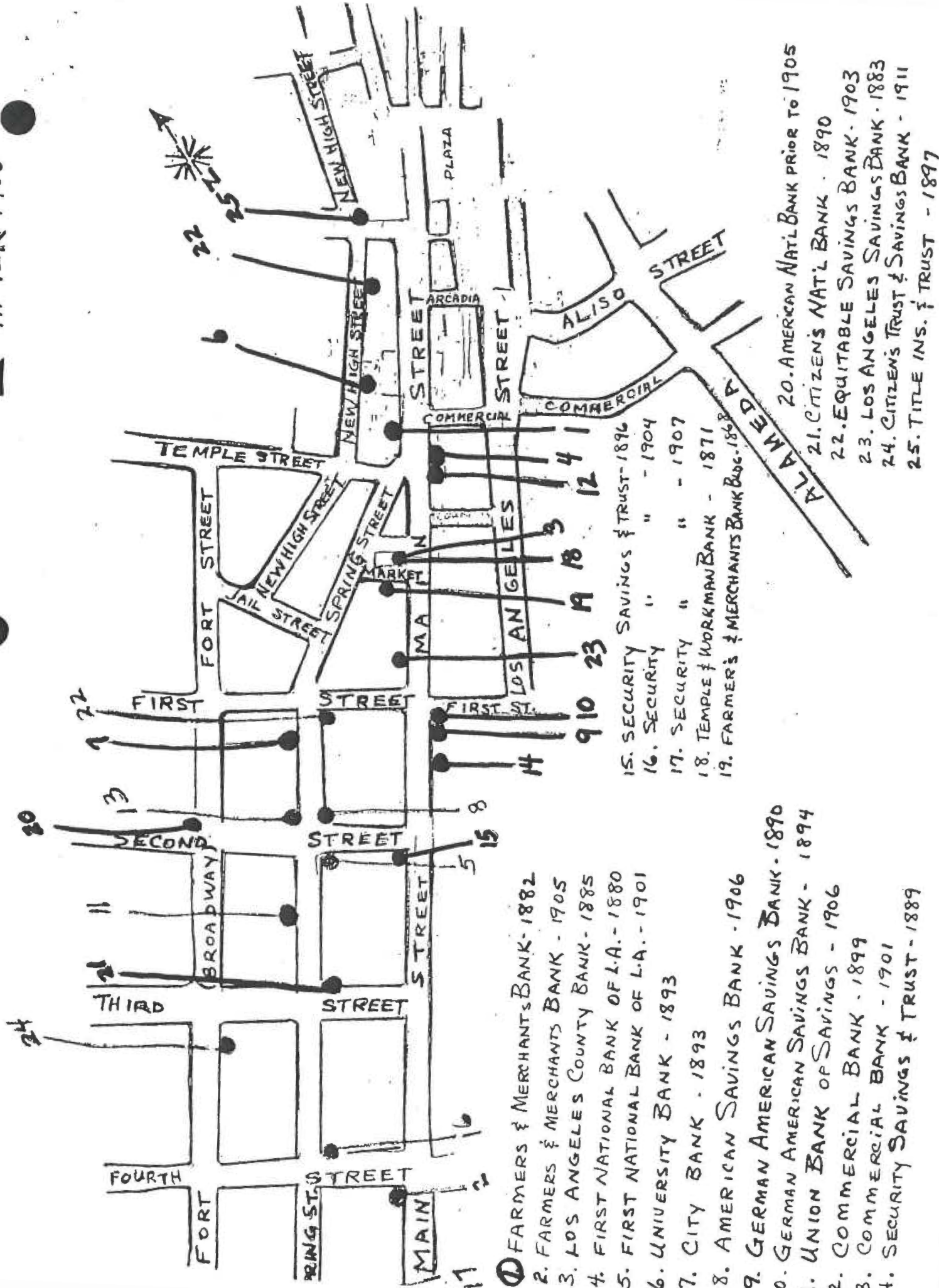
(formerly Bullock's Department Store)



<u>Nomination Code</u>	<u>Building</u>	<u>Construction</u>	<u>Architect</u>
62G	MACKEY	(1934)	Parkinson / Parkinson
62D	GENNET	(1922)	Parkinson / Hubbard
62A	PEASE	(1906)	Hudson / Munsel
62E	HART '24	(1924)	Parkinson / Parkinson
62F	HART '28	(1928)	Parkinson / Parkinson
62B	ESHMAN	(1909)	Morgan / Walls
62	Earl	(1906)	Parkinson / Bergstrom
63	HOLLENBECK	(1912)	Parkinson / Bergstrom
62C	BRIDGE	(1921)	- - -

Total 1.06 acres

Fig. 1

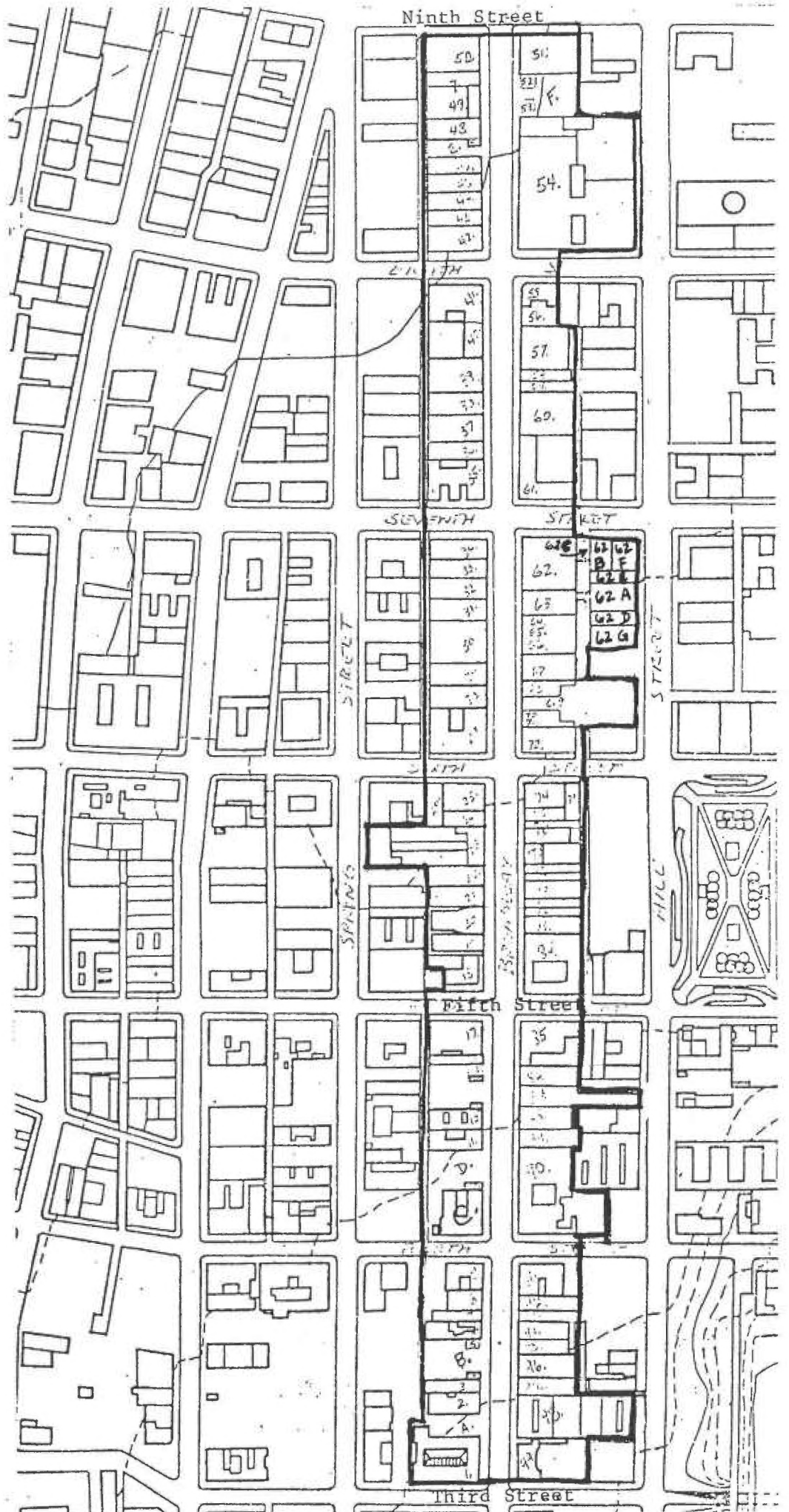


- 1. FARMERS & MERCHANTS BANK - 1882
- 2. FARMERS & MERCHANTS BANK - 1905
- 3. LOS ANGELES COUNTY BANK - 1885
- 4. FIRST NATIONAL BANK OF L.A. - 1880
- 5. FIRST NATIONAL BANK OF L.A. - 1901
- 6. UNIVERSITY BANK - 1893
- 7. CITY BANK - 1893
- 8. AMERICAN SAVINGS BANK - 1906
- 9. GERMAN AMERICAN SAVINGS BANK - 1890
- 10. GERMAN AMERICAN SAVINGS BANK - 1894
- 11. UNION BANK OF SAVINGS - 1906
- 12. COMMERCIAL BANK - 1899
- 13. COMMERCIAL BANK - 1901
- 14. SECURITY SAVINGS & TRUST - 1889
- 15. SECURITY SAVINGS & TRUST - 1896
- 16. SECURITY " " - 1904
- 17. SECURITY " " - 1907
- 18. TEMPLE & WORKMAN BANK - 1871
- 19. FARMERS & MERCHANTS BANK Bldg. - 1868
- 20. AMERICAN NAT'L BANK PRIOR TO 1905
- 21. CITIZENS NAT'L BANK - 1890
- 22. EQUITABLE SAVINGS BANK - 1903
- 23. LOS ANGELES SAVINGS BANK - 1883
- 24. CITIZENS TRUST & SAVINGS BANK - 1911
- 25. TITLE INS. & TRUST - 1897

Revised Boundary Map
12/26/85

BROADWAY THEATRE AND
COMMERCIAL DISTRICT

Los Angeles
Los Angeles County
California



1" = 425'

EXHIBIT 4

Council File: 16-1462


Title

850 South Hill Street / 225 West 9th Street / California Environmental Quality Act (CEQA) Appeal

Date Received / Introduced

12/20/2016

Last Changed Date

02/28/2017

Expiration Date

02/28/2019

Reference Numbers

Case: DIR-2015-2976-TDR-SPR-1A

Environmental: ENV-2006-6302-MND-REC-1

Council District

14

Pending in Committee

Planning and Land Use Management Committee

Initiated by

Area Planning Commission (APC) / Central

File Activities

Date	Activity
02/28/2017	Planning and Land Use Management Committee continued item to/for March 28, 2017 .
02/24/2017	Planning and Land Use Management Committee scheduled item for committee meeting on February 28, 2017.
12/22/2016	Area Planning Commission (APC) / Central document(s) referred to Planning and Land Use Management Committee.
12/20/2016	Document(s) submitted by Area Planning Commission (APC) / Central, as follows:

Online Documents (Doc)

Title	Doc Date
Communication from City Planning - Appeal Analysis	03/24/2017
Communication from Appellant No. 1 Representative	02/28/2017
Communication from Appellant No. 1 Representative	02/28/2017

Council Vote Information

No votes were found.

EXHIBIT 5

HOLLY L. WOLCOTT
CITY CLERK

SHANNON HOPPE
EXECUTIVE OFFICER

When making inquiries relative
to this matter, please refer to
the Council File No. 16-1462

City of Los Angeles
CALIFORNIA



ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. Spring Street, Room 395
Los Angeles, CA 90012
General Information: (213) 978-1133
FAX: (213) 978-1040

BRIAN WALTERS
DIVISION MANAGER

clerk.lacity.org

DIR-2015-2976-TDR-SPR
Council District 14

February 17, 2017

NOTICE TO APPELLANT(S), APPLICANT(S) AND INTERESTED PARTIES

You are hereby notified that the Planning and Land Use Management (PLUM) Committee of the Los Angeles City Council will hold a public hearing on **Tuesday, February 28, 2017** at approximately **2:30 PM** or soon thereafter in the Edward R. Roybal Board of Public Works Session Room, Room 350, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (entrance on Main Street), to consider the following: Mitigated Negative Declaration (MND), Addendum, and related California Environmental Quality Act findings, report from the Central Los Angeles Area Planning Commission (CLAAPC), and appeals filed by Alex Hertzberg, Society for the Preservation of Downtown Los Angeles (Representative: Daniel Wright, The Silverstein Law Firm, APC) and Sheila Swanson, Eastern Columbia Homeowners' Association (Representative: Robert L. Glushon, Kristina Kropp; Luna and Glushon) from the determination of the CLAAPC in adopting the MND (ENV-2006-6302-MND-REC-1) for the construction of a 27-story (approximately 320-feet above grade), mixed-use residential project with 305 dwelling units and 6,171 square feet of ground floor commercial space, with a total of 336 vehicular and 342 bicycle parking spaces, consisting of approximately 257,569 square feet of floor area with a proposed floor area ratio of 7.45:1, based on a Transfer of Floor Area Rights request, for the property located at 850 South Hill Street (840, 844, 846, 848, 850, 852, 856 South Hill Street; 217, 219, 221, 223, 223 1/2, 225 West Ninth Street), subject to modified Conditions of Approval.

Applicant: Garth Erdosy, Maple Multi-Family Land CA, LP
Representative: Alex Irvine, Craig Lawson and Co. LLC

If you are unable to appear at this meeting, you may submit your comments in writing. Written comments may be addressed to the City Clerk, Room 395, City Hall, 200 North Spring Street, Los Angeles, CA 90012. In addition, you may view the contents of Council file No. 16-1462 by visiting: <http://www.lacouncilfile.com>

Please be advised that the PLUM Committee reserves the right to continue this matter to a later date, subject to any time limit constraints.

Zina H. Cheng, Legislative Assistant
Planning and Land Use Management Committee
zina.cheng@lacity.org or (213) 978-1537

Note: If you challenge this proposed action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Clerk at or prior to, the public hearing. Any written correspondence delivered to the City Clerk before the City Council's final action on a matter will become a part of the administrative record. The time in which you may seek judicial review of any final action by the City Council is limited by California Code of Civil Procedure Section 1094.6 which provides that an action pursuant to Code of Civil Procedure Section 1094.5 challenging the Council's action must be filed no later than the 90th day following the date on which the Council action becomes final.