

**PLANNING DEPARTMENT TRANSMITTAL
TO THE CITY CLERK'S OFFICE
SUPPLEMENTAL
*CF 20-0339***

CITY PLANNING CASE:	ENVIRONMENTAL DOCUMENT:	COUNCIL DISTRICT:
CPC-2016-3808-VZC-CDO-DD-SPR	ENV-2016-3809-EIR	14
PROJECT ADDRESS:		
213 South Spring Street, 200-210 South Broadway, and 232-238 West 2nd Street		
PLANNER CONTACT INFORMATION:	TELEPHONE NUMBER:	EMAIL ADDRESS:
Kathleen King	213-847-3624	Kathleen.king@lacity.org

NOTES / INSTRUCTION(S):	
<p>The attached supplemental findings are needed to demonstrate that Alternative 4A (which is the approved Project) complies with the provisions of the Center City Redevelopment Plan.</p>	
TRANSMITTED BY:	TRANSMITTAL DATE:
Raoul Mendoza	6/25/20

**DEPARTMENT OF
CITY PLANNING**

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June 25, 2020

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

SUPPLEMENTAL INFORMATION FOR THE 222 WEST 2ND STREET PROJECT; CF 20-0339

On its meeting of February 13, 2019, the City Planning Commission (CPC) recommended approval of a Vesting Zone Change and approved a Design Overlay Plan Approval, Director's Decision, and Site Plan Review for Case No. CPC-2016-3808-VZC-CDO-DD-SPR.

In a letter dated October 24, 2019, the Applicant requested that the Department of City Planning consider the recommendation of Residential Alternative 4A [With Podium] (Alternative 4A), which was analyzed as an Alternative in the 222 W. 2nd Street EIR, in place of the Project. The Draft EIR analysis identified Alternative 4A as an environmentally superior alternative as it reduces the Project's significant and unavoidable transportation impacts to a level of less than significant, while generally meeting the Project objectives to the same extent as the Project. On December 5, 2019 the Deputy Advisory Agency certified the 222 W. 2nd Street EIR and adopted the Findings, Statement of Overriding Considerations, and Mitigation Monitoring Program for Alternative 4A. As stated above, CPC approved Case No. CPC-2016-3808-VZC-CDO-DD-SPR which includes Alternative 4A.

Pursuant to Ordinance No. 186,325, as of September 30, 2019, the land use-related plans and functions of the Designated Local Authority, the former local CRA/LA, have been transferred to the City of Los Angeles. Therefore, the City can take action regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and other applicable provisions of the LAMC.

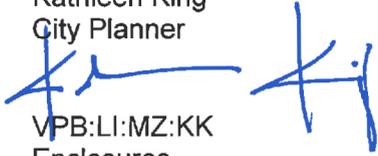
Alternative 4A must comply with the provisions of the Center City Redevelopment Plan. Attached are Findings which demonstrate Alternative 4A's compliance with the Center City Redevelopment Plan. Staff recommends that the attached findings be adopted as part of the letter of determination for Alternative 4A (on Page F-15 to be incorporated beneath the "Good Zoning Practices" subheader) and that the accompanying request for the Vesting Zone Change be approved.

PLUM Committee
CF 20-0339
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Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

Kathleen King
City Planner



VPB:LI:MZ:KK
Enclosures
Supplemental Findings

City Center Redevelopment Plan Findings

The Project Site is located in the City Center Redevelopment Plan Area, specifically the Historic Downtown Development subarea. The Redevelopment Plan for the project area was adopted on May 15, 2002, with an end date of May 15, 2032. The City Center Redevelopment Plan's primary objective is eliminating and preventing blight in the area. The findings below demonstrate that Alternative 4A is in substantial conformance with the purpose, intent, and provisions of the City Center Redevelopment Plan.

Enacted on June 29, 2011, Assembly Bill 1x-26 (AB 26) revised provisions of the Community Redevelopment Law of the State of California, to dissolve all redevelopment agencies and community development agencies in existence and designate successor agencies, as defined, as successor entities. Among the revisions, the amendments to the law withdrew all authority to transact business or authorize powers previously granted under the Community Redevelopment Law (Section 34172.a.2), and vested successor agencies with all authority, rights, powers, duties and obligations previously vested with the former redevelopment agencies (Section 34172.b).

Pursuant to Ordinance No. 186,325, as of September 30, 2019, the land use-related plans and functions of the Designated Local Authority, the former local CRA/LA, have been transferred to the City of Los Angeles. Therefore, the City can take action regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and other applicable provisions of the LAMC, including LAMC Section 14.5.6.

1. To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the project area in accordance with this plan.

The Project Site is developed with a surface parking lot, currently in use as a staging and excavation area for the construction of the Los Angeles Metropolitan Transportation Authority (Metro) Regional Connector and a parking structure, located on the southern portion of the Site. Landscaping on the Project Site is limited to 19 on-site trees, 12 on-site palms, six street trees (along Broadway and Spring Street) and a narrow landscaped parkway that traverses the Site along the northern edge of the parking structure. Due to the Site being developed with a surface parking lot and a parking structure, the street frontage is relatively inactive and the northern portion of the site (where the surface parking lot is located) is underutilized. Alternative 4A would redevelop the northern portion of the Site with a new mixed-use building located directly above the Metro Regional Connector Historic Broadway Station. Alternative 4A would include 680 residential units, of which 45 units would be set aside for Workforce Housing units (6.6 percent of the total units), 10,000 square feet of ground floor commercial uses, and would feature pedestrian-scale improvements and ground floor amenities, including a landscaped paseo with benches and café seating, thus rehabilitating the Site with active uses.

2. To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.

3. To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.

4. To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.

The Project Site is zoned C2, designated Regional Center Commercial and located at the northern end of the Historic Core District within the Central City Community Plan. The Regional Center Land Use Designation is characterized by "Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages..." for which the ground floor commercial uses should encourage pedestrian activity. The Framework Element also designates the Project Site within the Downtown Center which is characterized as "an international center for finance and trade that serves the population of the five-county metropolitan region. It is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, high-rise residential towers, regional transportation facilities and the Convention Center. These uses serve the region, state, nation and world. Generally, the Downtown Center is characterized by FARs up to 13:1 and high-rise buildings." Alternative 4A would be consistent with the Framework Element's Land Use Designation as Alternative 4A would be a mixed-use, high-rise residential tower that would provide 680 residential units and 10,000 square feet of ground floor commercial space.

Alternative 4A would support the development and rehabilitation of the greater downtown area and Historic Core District, as well as contribute to the area's economic vitality by developing the Site with commercial and residential uses that complement the nearby cultural and civic institutions. Further, Alternative 4A would be consistent with Central City Community Plan's vision for the Historic Core District becoming a 24-hour community by developing the Site with a mix of uses, including a significant amount of housing that is within close proximity to retail and commercial developments and that strengthens the link between the surrounding districts/neighborhoods, including the South Park District to the south, the Civic Center /Little Tokyo District to the north, and the Financial Core and Bunker Hill Districts to the west.

5. To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.

Alternative 4A would guide growth and development in the area by redeveloping a surface parking lot with a new mixed-use building that would generate new job opportunities associated with the 10,000 square feet of ground floor commercial space. The 680 residential units proposed as part of Alternative 4A, of which 45 units would be set aside for Workforce Housing units (6.6 percent of the total units), would offer a mix of unit types for new residents, as well as provide new ground floor commercial uses located above the Metro Regional Connector Historic Broadway Station, siting new commercial growth in a location aligned with City plans and policies.

6. To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.

Alternative 4A would redevelop a surface parking lot, currently in use as a staging and excavation area for construction of the Metro Regional Connector Historic Broadway Rail Station, with a 56-story, mixed-use, high-rise building that would consist of 680 residential units, of which 45 units (or 6.6 percent of the total units) would be set aside for Workforce Housing units, 10,000 square feet of ground floor commercial uses, and 74,165 square feet of open space. In total, Alternative 4A would contain up to 707,036 square feet of floor area, inclusive of the 9,810 square-foot Metro portal and plaza, for an FAR of 6:1. As proposed, Alternative 4A includes a mix of uses that would provide housing and employment opportunities immediately above the future Metro Regional

Connector Historic Broadway Rail Station, creating a modern and efficient environment for visitors, employees, and residents.

7. To create a symbol of pride and identity which give the Central City a strong image as the major center of the Los Angeles Region.

Alternative 4A would be designed in a contemporary architectural style, via a 56-story high-rise tower that is situated above the Metro Regional Connector Historic Broadway Station. The ground floor commercial uses would feature 27-foot floor-to-ceiling glass curtainwalls along the street frontages, while the residential podium would be constructed with glass and aluminum framing. These varied surface materials would provide vertical and horizontal articulation that would break up the building planes and reduce the visual massing of the building. To further break up the overall massing of the tower and to add visual interest to the building, the tower's façade would offset and recess on Levels 28 and 39. Additionally a fritted glass crown would be located on the rooftop of the tower, creating a unique roofline and contributing to the downtown Los Angeles' distinct skyline, which gives the Central City a strong image as the major center of the Los Angeles Region.

8. To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through, and out of the Central City.

The Project Site is transit accessible and in proximity to many bus transit lines, Metro rail lines and DASH service. The Project Site is well served by transit and is located approximately 0.4 miles southeast from the Civic Center/Grand Park Metro Red and Purple Line Station (located at the southwest corner of 1st Street and Hill Street) and 0.48 miles northeast of the Pershing Square Metro Red and Purple Line Station. In addition, Alternative 4A would be built above the Metro Regional Connector Historic Broadway Rail Station and would be 0.5 miles from the Metro Regional Connector 2nd Street/Hope Street and 1st Street/Central Avenue Stations. The Site is also served by Metro Bus Lines 2/302, 14, 20, 28, 30/330, 37, 40, 45, 55/355, 60, 6870, 71, 76, 78/79/378, 81, 83, 92, 96, 442, 487/489, Metro Rapid Bus Lines 728, 745, 770, LADOT Commuter Express Lines 409, 419, 422, 423, 431, 437, 438, 448, and 534, and LADOT DASH Lines A, B, D, and F. Thus, the Project Site is well served by transit.

9. To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees, and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric.

Alternative 4A would improve the streetscape by providing a pedestrian entryway to the Metro plaza, which would be designed with a decorative wood-paneled ceiling, supported by structural columns. The ceiling would gradually slope down to create a pedestrian scale façade that would span the entire length of 2nd Street and the Broadway and Spring Street corners, creating a cohesive ground floor. Alternative 4A would also include a public paseo that would provide a pedestrian pathway accessible from Broadway and the Metro plaza area across the Site to Spring Street. The paseo would be landscaped with native and adaptive native plants, and include seating areas, and create a social space able to host a variety of uses including outdoor seating and bike parking, while facilitating pedestrian circulation to and from the adjacent ground floor commercial spaces, all positioned to activate the space. As shown on the plans, 10 new street trees are proposed along the Broadway and Spring Street parkways, however given the wide range of subsurface subway facilities surrounding the Project Site, which are required by Metro, it is unclear whether the 10 proposed street trees could be planted.

Residents and visitors would be able to access the ground floor commercial uses from public paseo, 2nd Street, Spring Street, and Broadway. Further, Alternative 4A includes terraces on levels 2, 11, and 39, as well as a roof deck that would be landscaped with trees, shrubs, and other native plants and would serve the building residents.

10. To develop and implement public art into the urban fabric, integrating art into both public and private developments.

Alternative 4A would be required to comply with LAMC Section 91.107.104, which requires any applicant proposing a commercial building shall be required to pay a fee in accordance with the Arts Development Fee. The fees shall be paid prior to issuance of a building permit, but does not apply to any residential portion of a building. Thus, Alternative 4A would be required to pay a fee for any retail space.

11. To preserve key landmarks which highlight the history and unique character of the City, blending old and new in an aesthetic realization of change or growth with distinction, and facilitating the adaptive reuse of structures of architectural, historic, or cultural merit.

Alternative 4A would redevelop a surface parking lot with a 56-story mixed-use high-rise building. No landmarks and/or historical or cultural buildings or features are located on the Project Site. Alternative 4A would meet the Broadway CDO Standards under Guidelines one which requires that new construction be pedestrian-oriented and compatible with the mixed-use development along Broadway, while also differentiated from existing historic buildings.

The proposed building would be differentiated from the nearby historic buildings by its contemporary materials, however the tallest portion of the building would be gradually oriented away from Broadway and toward Spring Street, reflecting, to a degree, the height and massing of the Mirror Building directly north of the Project Site across 2nd Street. Thus, the design of the proposed building is responsive to the height and massing of the buildings that surround it. The building's features, including the ground floor transparent uses, podium massing and height and public pedestrian paseo would be compatible with the surrounding historic buildings' features. The 10-story podium would mirror the building height and form of the surrounding older structures, such as the Victor Clothing Building and the Bradbury Building, both which are located on Broadway. Thus, Alternative 4A would contribute to the blending of the old and new in an aesthetic realization of distinctive change and growth.

12. To provide a full range of employment opportunities for persons of all income levels.

Alternative 4A would introduce 680 residential units, of which 45 units would be set aside for Workforce Housing units (6.6 percent of the total units), and 10,000 square feet of ground floor commercial uses such as restaurants and retail stores, resulting in a range of employment opportunities. Therefore, Alternative 4A's new residential, restaurant, and retail uses, employment opportunities, transit-oriented location, public paseo, and ensure the Alternative would be consistent with the Redevelopment Plan's Objectives.

Conformance with Requirements of the City Center Redevelopment Plan

(a) Section 502 - Redevelopment Plan Map

Section 502 pertains to the relationship between the Redevelopment Plan and the other plans that address development in City Center area and defers to the General Plan, Community Plan, and any applicable zoning ordinance regarding allowable land uses and is further clarified by the

CRA/LA in a memorandum dated June 21, 2012.¹ The Project Site is designated as a Downtown Center in the General Plan Framework, Regional Center Commercial in the Central City Community Plan, and in the [Q]C2-4D-CDO-SN zone. The recommended Vesting Zone Change would remove Q Condition No. 7 of Ordinance No. 180,871 for the Project Site. The Ordinance, which became effective on October 26, 2009, established the Broadway Theater Entertainment District Community Design Overlay (Broadway CDO) and contains Q Conditions, which provide context-specific regulations pertaining to use and design. Q Condition No. 7 requires that the lot coverage for portions of buildings over 150 feet shall be no less than 30 percent of the lot and no more than 40 percent of the lot. The Applicant is requesting a Vesting Zone Change to deviate from this requirement and provide floorplates ranging from 9,812 square feet (8.31 percent lot coverage) to 12,371 square feet (10.48 percent lot coverage). No General Plan Amendment is proposed as part of Alternative 4A. Therefore, Alternative 4A would comply with Section 502 of the Redevelopment Plan.

(b) Section 503.6 - Residential Uses within Commercial Areas

Section 503.6 allows for the residential uses in commercial areas so long as it is consistent with the applicable Community Plan, permitted by the zoning and LAMC, and conforms to the four criteria; promote community revitalization, promote the goals and objective of the Plan, be compatible with and appropriate for the commercial uses in the vicinity, and meet design and location criteria by the Agency.

As explained above, Alternative 4A meets the goals and objectives of the Redevelopment Plan by redeveloping a surface parking lot with a 56-story mixed used development consisting of 680 residential units, of which 45 units would be Workforce Housing Units (6.6 percent of the total units) and 10,000 square feet of active ground floor commercial uses. Alternative 4A would be compatible with the other commercial uses in the vicinity as there are many similar mixed-use developments in the area, that provide ground floor commercial space and residential units. The Alternative's ground floor commercial space, public paseo, and the Metro plaza would activate the streets of the area promoting pedestrian activity. Alternative 4A has also been designed to comply with the Broadway CDO Standards and is permitted by the zoning and LAMC. Therefore, Alternative 4A would comply with Section 503.6 of the Redevelopment Plan.

(c) Section 508. 1 – Historic Downtown Development Area

Section 508.1 states that the following three land uses shall be allowed in the Historic Downtown Development Area; Public Land, Private Land, and Private Land Alternate Use. Alternative 4A is a mixed-use residential and commercial development that would be consistent with the uses listed for Private Land Alternate Use (any use permitted by the applicable Community Plan) as Alternative 4A provides 680 residential units, a public paseo, and ground floor commercial uses such as a restaurant and retail store which would provide a service to the community. Therefore, Alternative 4A would comply with Section 508.1 of the Redevelopment Plan.

(d) Section 509 - Limitations on Type

Section 509 states that the type, size and height of buildings shall be limited by applicable federal, State and local statutes, codes, ordinances and regulations and as generally diagrammed in Exhibit No. 4 of the Redevelopment Plan. Alternative 4A would be consistent with the intent of the Redevelopment Plan as well as the Central City Community Plan and applicable sections of the

¹ CRA/LA, A designated Local Authority. Clarification Regarding Discretionary Land Use Action. http://www.crala.org/internet-site/Meetings/Board_Agenda_2012/upload/June_21_2012_Item_13.pdf. Accessed February 21, 2020.

LAMC. The Project Site is located in Height District 4D, with unlimited building height and a development limitation of 6:1 FAR. The Project Site is also located in the Historic Downtown Development Area, which limits FAR to 6:1. Therefore, Alternative 4A would comply with Section 509 of the Redevelopment Plan.

(e) Section 512.1 - Maximum Floor Area Ratios

Section 512.1 requires that the maximum floor area ratios for any parcel in the Historic Downtown Development Area to be no more than six times the parcel area. In total, Alternative 4A would contain up to 707,036 square feet of floor area, inclusive of the 9,810 square-foot Metro portal and plaza on a 2.71 net acre lot for an FAR of 6:1. Therefore, Alternative 4A would comply with Section 512.1 of the Redevelopment Plan.

(f) Section 513 - Open Space, Landscaping, Light, Air and Privacy.

Section 513 of the Redevelopment Plan defines the approximate amount of total open space to be provided in the Redevelopment Plan area and also states that sufficient space shall be maintained between buildings to provide adequate light, air, and privacy. While this provision applies to the entire CRA Project Area and is not meant to be directly applied to individual development projects, Alternative 4A would provide open space areas to generally support this plan provision. The residential tower would be located more than 80 feet from any offsite existing and future high-rise buildings in the area, which would provide sufficient space between the tower and any off-site high-rise buildings. Landscaping would be provided in the public paseo, terraces, and building rooftop. Alternative 4A would also comply with open space requirements under LAMC Section 12.21.G.

(g) Section 514 - Signs, Billboards and Skyline Signage.

Section 514 prohibits billboards and requires that all other signage conform to the City's signage standards. All signage would comply with the City's sign standards, including the Broadway Sign District. Therefore, Alternative 4A conforms with Section 514 of the Redevelopment Plan.

(h) Section 515 - Utilities.

Section 515 requires that all utilities be placed underground if physically and economically feasible. Alternative 4A conforms to Section 515 as all utility lines would be placed underground or screened from public view.

(i) Section 516 – Parking and Loading Facilities

Section 516 requires that all parking be provided consistent with the standards of the LAMC and that parking and loading areas be screened/out of view from the public. Alternative 4A would provide commercial and residential parking that meets the requirements of the LAMC. Parking for Alternative 4A would be located all on site, within the existing parking structure comprised of two subterranean levels and five above-ground levels. In addition, the loading area for the commercial ground floor space would be located on-site at the southeast corner away from the Metro plaza and the building's primary frontage along 2nd Street. Loading would largely be contained on-site, but in the event that any loading would have to occur outside the boundaries of the Site, a drop-off area would be located along Spring Street. Therefore, Alternative 4A conforms with Section 516 of the Redevelopment Plan.

(j) Section 517 – Setbacks

Section 517 requires that all setback areas be landscaped, paved for accessibility, and maintained by the owner. Alternative 4A would include a landscaped and hardscaped, public paseo that traverses the Site.

The Broadway CDO Guideline No. 3 requires a continuous streetwall by locating new buildings at the property line or the prevailing setback and Q Conditions have been adopted to ensure compliance with and implementation of essential components of the Broadway Theater and Entertainment District Design Standards and Guidelines. Specifically, Q Condition Nos. 3 and 6 require that ground floor commercial uses shall be built to the property line or prevailing setback, whichever applies, and that all new buildings shall be built to any property along Broadway and any perpendicular street (which would include 2nd Street). Where the Broadway CDO Q Conditions and Broadway Design Guidelines differ from the Downtown Design Guidelines, the Broadway W Conditions and CDO supersede the Downtown Design Guidelines. However, if the Broadway CDO is silent on a topic, the Downtown Design Guidelines are applicable.

The Project Site is subject to a five-foot Building Line imposed along the Broadway frontage per Ordinance No. 75,667. The ground floor commercial uses would be built to the shared property line between the northeasterly side of the Metro plaza and the subject site; and to the property line along 2nd Street. The podium built over the Metro plaza would not encroach into the five-foot Building Line. It should be noted that the Site is located within a Metro Rail Project Area and, as shown on Vesting Tentative Tract (VTT) Map No. 74320, Lots 2, 3, and 7 are owned by Metro and would be occupied by the Metro plaza, portal and station. The Metro plaza area (Lot 3) would occupy the immediate frontage along Broadway and a portion of 2nd Street, however the ground floor uses would be built to the property line adjacent to the Metro plaza. All setbacks would be consistent with existing zoning and the requirements of the Broadway CDO. Therefore, Alternative 4A conforms with Section 517 of the Redevelopment Plan.

(k) Section 522 – Design Guidelines and Development Controls

Section 522 requires that all new improvements to existing and proposed developments be in accordance with the Redevelopment Plan and any other applicable design guidelines and development controls. As clarified by CRA/LA, land use regulations, shall defer to and are superseded by the underlying General Plan, Community Plan, and Zoning Ordinance, including the codified sections of the current Downtown Design Guide, and the Broadway CDO Standards. Alternative 4A would include a public paseo, street trees if not restricted by the subsurface subway improvements, and a modern building design that respects the historic context along Broadway, with residential and ground floor commercial street fronts in support of a pedestrian-oriented ground floor design. Alternative 4A is consistent with the design guidelines and standards in the Broadway CDO, which supersede the Downtown Design Guide. Therefore, Alternative 4A conforms to Section 522 of the Redevelopment Plan.

(l) Section 523 - Variances, Conditional Use Permits, Building Permits and Other Land Development Entitlements

Section 523 requires that no zoning variance, conditional use permit, building permit, demolition permit or other land development entitlement be issued without approval from the CRA/LA. Alternative 4A requests the following entitlements: a Vesting Zone Change, a Design Overlay Approval, a Director's Decision, and Site Plan Review. As stated in Ordinance No. 186325, the City Planning Department has assumed the roles and authority of the former CRA/LA, so the City Planning Department would ensure that all entitlements are consistent with the intent of the

Center City Redevelopment Plan. Therefore, the Alternative 4A conforms to Section 523 of the Redevelopment Plan.