

PLANNING DEPARTMENT TRANSMITTAL TO THE CITY CLERK'S OFFICE

CITY PLANNING CASE:	ENVIRONMENTAL CASE:	COUNCIL DISTRICT:
CPC-2018-3336-SN-TDR-CUB-SPR-MS-1A	ENV-2018-3337-SCEA	14 – Jurado
RELATED CASE NOS.:	COUNCIL FILE NO:	PROCEDURAL REGULATIONS:
VTT-82213-2A; CPC-2018-3336-SN-TDR-CUB-SPR-MS	See Notes/Instructions below.	<input type="checkbox"/> Ch. 1 as of 1/21/24 (Not subject to Processes & Procedures Ord.) <input checked="" type="checkbox"/> Ch. 1A (Subject to Processes & Procedures Ord.)
PROJECT ADDRESS / LOCATION:		
1600 South Flower Street (1600-1618 South Flower Street, 1601-1623 South Hope Street, 426-440 West Venice Boulevard)		
APPLICANT:	TELEPHONE NUMBER:	EMAIL ADDRESS:
Jacob Taban, Venice Hope Group, LLC	(213) 745-5191	daniel@jadeent.com
APPLICANT'S REPRESENTATIVE:	TELEPHONE NUMBER:	EMAIL ADDRESS:
Alex Irvine, Irvine and Associates Inc.	(213) 437-3403	alex@irvineassoc.com
APPELLANT:	TELEPHONE NUMBER:	EMAIL ADDRESS:
Faramarz Yadegar	(213) 268-5890	sibelle.of.ca@gmail.com
APPELLANT'S REPRESENTATIVE:	TELEPHONE NUMBER:	EMAIL ADDRESS:
<input checked="" type="checkbox"/> N/A		
PLANNER CONTACT:	TELEPHONE NUMBER:	EMAIL ADDRESS:
More Song	(213) 978-1319	more.song@lacity.org
ITEMS FOR CITY COUNCIL CONSIDERATION (IE. ENTITLEMENTS, LEGISLATIVE ACTIONS):		
Appeal of: Conditional Use (CUB); Site Plan Review (SPR); Director's Determination		
FINAL ENTITLMENTS NOT ADVANCING FOR CITY COUNCIL CONSIDERATION: (UNAPPEALED OR NON-APPEALABLE ITEMS)		
<input checked="" type="checkbox"/> N/A		
ITEMS APPEALED:		
Conditional Use (CUB); Site Plan Review (SPR); Director's Determination		

ATTACHMENTS:	REVISED:	ENVIRONMENTAL DOCUMENT:	REVISED:
<input checked="" type="checkbox"/> Letter of Determination	<input type="checkbox"/>	<input type="checkbox"/> Categorical Exemption (CE) (Notice of Exemption)	<input type="checkbox"/>
<input checked="" type="checkbox"/> Findings of Fact	<input type="checkbox"/>	<input type="checkbox"/> Statutory Exemption (SE) (Notice of Exemption)	<input type="checkbox"/>
<input checked="" type="checkbox"/> Staff Recommendation Report	<input type="checkbox"/>	<input type="checkbox"/> Negative Declaration (ND)	<input type="checkbox"/>
<input checked="" type="checkbox"/> Conditions of Approval	<input type="checkbox"/>	<input type="checkbox"/> Mitigated Negative Declaration (MND)	<input type="checkbox"/>
<input type="checkbox"/> T Conditions	<input type="checkbox"/>	<input type="checkbox"/> Environmental Impact Report (EIR)	<input type="checkbox"/>
<input type="checkbox"/> Proposed Ordinance	<input type="checkbox"/>	<input checked="" type="checkbox"/> Mitigation Monitoring Program (MMP)	<input type="checkbox"/>
<input type="checkbox"/> Zone Change Map and Ordinance	<input type="checkbox"/>	<input type="checkbox"/> Sustainable Communities Project Exemption (SCPE)	<input type="checkbox"/>
<input type="checkbox"/> GPA Resolution	<input type="checkbox"/>	<input checked="" type="checkbox"/> Sustainable Communities Environmental Assessment (SCEA)	<input type="checkbox"/>
<input type="checkbox"/> Land Use Map	<input type="checkbox"/>	<input type="checkbox"/> Sustainable Communities Environmental Impact Report (SCEIR)	<input type="checkbox"/>
<input type="checkbox"/> Exhibit A – Plans	<input type="checkbox"/>	<input type="checkbox"/> Appendices	<input type="checkbox"/>
<input checked="" type="checkbox"/> Mailing List (both Word and PDF)	<input type="checkbox"/>	<input type="checkbox"/> Other:	<input type="checkbox"/>
<input checked="" type="checkbox"/> Interested Parties List	<input type="checkbox"/>		
<input checked="" type="checkbox"/> Appeal	<input type="checkbox"/>		
<input type="checkbox"/> Development Agreement	<input type="checkbox"/>		
<input type="checkbox"/> Site Photographs	<input type="checkbox"/>		
<input type="checkbox"/> Other	<input type="checkbox"/>		

NOTES / INSTRUCTIONS:

Please create Supplemental CF #25-1208-S1 for this appeal.

Copy of the SCEA is available on Planning's website:

<https://planning.lacity.gov/development-services/environmental-review/scea/south-park-towers-project-0>

CITY COUNCIL NOTICE TIMING:	NOTICE LIST (SELECT ALL):	NOTICE PUBLICATION:
<input type="checkbox"/> 10 days <input type="checkbox"/> 15 days <input checked="" type="checkbox"/> 24 days <input type="checkbox"/> N/A / None <input type="checkbox"/> Other: [enter here if applicable]	<input checked="" type="checkbox"/> Owner <input checked="" type="checkbox"/> Applicant <input type="checkbox"/> Adjacent/Abutting <input type="checkbox"/> 100' radius <input type="checkbox"/> 300' radius <input checked="" type="checkbox"/> 500' radius <input checked="" type="checkbox"/> Neighborhood Council <input checked="" type="checkbox"/> Interested Parties <input checked="" type="checkbox"/> Other: Appellant	<input type="checkbox"/> 10 days <input type="checkbox"/> 15 days <input checked="" type="checkbox"/> 24 days <input type="checkbox"/> N/A / None <input type="checkbox"/> Other: [enter here if applicable]

FISCAL IMPACT STATEMENT:

☒ Yes

☐ No

*If determination states administrative costs are recovered through fees, indicate "Yes."

PLANNING COMMISSION:	
<input checked="" type="checkbox"/> City Planning Commission (CPC) <input type="checkbox"/> Cultural Heritage Commission (CHC) <input type="checkbox"/> Central Area Planning Commission <input type="checkbox"/> East LA Area Planning Commission <input type="checkbox"/> Harbor Area Planning Commission	<input type="checkbox"/> North Valley Area Planning Commission <input type="checkbox"/> South LA Area Planning Commission <input type="checkbox"/> South Valley Area Planning Commission <input type="checkbox"/> West LA Area Planning Commission
PLANNING COMMISSION HEARING DATE:	COMMISSION VOTE:
July 10, 2025	5 - 0
LAST DAY TO APPEAL:	DATE APPEALED:
October 14, 2025	October 14, 2025
COUNCIL TIME TO ACT:	TIME TO ACT START:
<input type="checkbox"/> 30 days <input type="checkbox"/> 45 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 75 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> N/A / None <input type="checkbox"/> Other: [enter here if applicable]	<input type="checkbox"/> Appeal Filing Date <input type="checkbox"/> Received by Clerk <input checked="" type="checkbox"/> Last Day to Appeal <input type="checkbox"/> N/A / None <input type="checkbox"/> Other:
TRANSMITTED BY:	TRANSMITTAL DATE:
Cecilia Lamas Commission Executive Assistant II	October 28, 2025



LOS ANGELES CITY PLANNING COMMISSION

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

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: OCTOBER 03, 2025

Case No.: CPC-2018-3336-SN-TDR-CUB-SPR-MS

Council District: 14 – Jurado

CEQA: ENV-2018-3337-SCEA

Plan Area: Downtown

Related Case: VTT-82213-1A

Project Site: 1600 – 1618 South Flower Street; 1601 – 1623 South Hope Street;
426 – 440 West Venice Boulevard

Applicant: Jacob Taban, Venice Hope Group, LLC.
Representative: Alex Irvine, Irvine and Associates Inc.

At its meeting **July 10, 2025**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

The South Park Towers Project (Project) proposes the demolition of 89,510 square feet of commercial uses within four buildings for the construction of a two-tower, mixed-use development consisting of 250 residential dwelling units, 300 hotel guest rooms, and 13,120 square feet of ground floor retail uses, for a total of 452,630 floor area on an approximately 1.6-acre site, and up to 23 stories in building height.

1. **Found**, pursuant to Public Resources Code (PRC) Section 21155.2, after consideration of the whole of the administrative record, including the SB 375 Sustainable Communities Environmental Assessment (SCEA) No. ENV-2018-337-SCEA and Erratum dated September 2024, and all comments received, after imposition of all mitigation measures, there is no substantial evidence that the Project will have a significant effect on the environment; **Found** that the City Council held a hearing on and adopted the SCEA on October 1, 2024 pursuant to PRC Section 21155.2(b); **Found** the Project is a “transit priority project” as defined by PRC Section 21155, and the Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior EIRs, including SCAG 2020-2045 RTP/SCS EIR (SCH No. 2015031035); **Found** all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA; **Found** with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; **Found** the SCEA reflects the independent judgment and analysis of the City; **Found** the mitigation measures have been made enforceable conditions on the Project; and **Adopted** the SCEA and the Mitigation Monitoring Program prepared for the SCEA;
2. **Approved and recommended** that the City Council **adopt** the attached Modified ordinances, pursuant to Section 12.32 S of the Los Angeles Municipal Code (LAMC), an ordinance for the establishment of a Sign District (-SN Supplemental Use District) Zoning designation for the

Project Site and an ordinance to provide a comprehensive set of sign regulations for the Project Site;

3. **Approved** and **recommended** that the City Council **approve**, pursuant to LAMC Section 14.5.6 B, a Transfer of Floor Area Rights and associated Public Benefits Payment for the transfer of greater than 50,000 square feet of floor area of up to 226,121 square feet of floor area for a Transit Area Mixed-Use Project, from the City of Los Angeles Convention Center (Donor Site) at 1201 South Figueroa Street, to the Project Site (Receiver Site), thereby permitting a maximum 6:1 FAR in lieu of the otherwise permitted 3:1 FAR;
4. **Requested** that within six months of the receipt of the Public Benefits Payment by the Public Benefit Trust Fund, the Chief Legislative Analyst convene the Public Benefit Trust Fund Committee, pursuant to LAMC Section 14.5.12;
5. **Approved**, pursuant to LAMC Sections 12.24 W.1 and 12.24 S, a Conditional Use Permit for the sale and dispensing of a full line of alcoholic beverages for on-site consumption within the proposed hotel; and a 20 percent reduction in the required amount of vehicle parking;
6. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for the construction of a proposed development project which will create an increase of more than 50 dwelling units or guest rooms;
7. **Approved**, pursuant to LAMC Section 12.21 G, a Director's Determination to allow for up to a 10 percent reduction in the total required residential open space;
8. **Adopted** the attached Modified Conditions of Approval; and
9. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Choe
Second: Klein
Ayes: Cabildo, Mack, Saitman
Absent: Diaz, Lawshe, Zamora

Vote: 5 – 0



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

APPEAL PERIOD - EFFECTIVE DATE

The decision of the Los Angeles City Planning Commission is appealable to City Council within 20 days after the mailing date of this determination letter. Any appeal not filed within the 20-day period shall not be considered by the Council.

FINAL APPEAL DATE: OCTOBER 23, 2025

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

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these

Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).

This determination will become effective after the end of appeal period date listed above, unless an appeal is filed with the Department of City Planning. An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment.

An appeal may be filed utilizing the following options:

Online Application System (OAS): The OAS (<https://planning.lacity.gov/oas>) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.gov/development-services/forms>. Public offices are located at:

Metro DSC	Van Nuys DSC	South LA DSC
201 N. Figueroa Street Los Angeles, CA 90012 planning.figcounter@lacity.org (213) 482-7077	6262 Van Nuys Boulevard Van Nuys, CA 91401 planning.mbc2@lacity.org (818) 374-5050	(In person appointments available on Tuesdays and Thursdays 8am-4pm only) 8475 S. Vermont Avenue 1st Floor Los Angeles, CA 90044 planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Verification of condition compliance with building plans and/or building permit applications are done at the City Planning Metro or Valley DSC locations. An in-person or virtual appointment for Condition Clearance can be made through the City's [BuildLA](#) portal (appointments.lacity.gov).

The applicant is further advised to notify any consultant representing you of this requirement as well.



QR Code to
Online Appeal
Filing



QR Code to Forms for In-
Person Appeal Filing



QR Code to BuildLA Appointment
Portal for Condition Clearance

Attachments: Sign District Zoning Ordinance, Map, Modified Draft South Park Towers Sign District Ordinance and Appendix A - Conceptual Sign Plans, Modified Conditions of Approval, Amended Findings

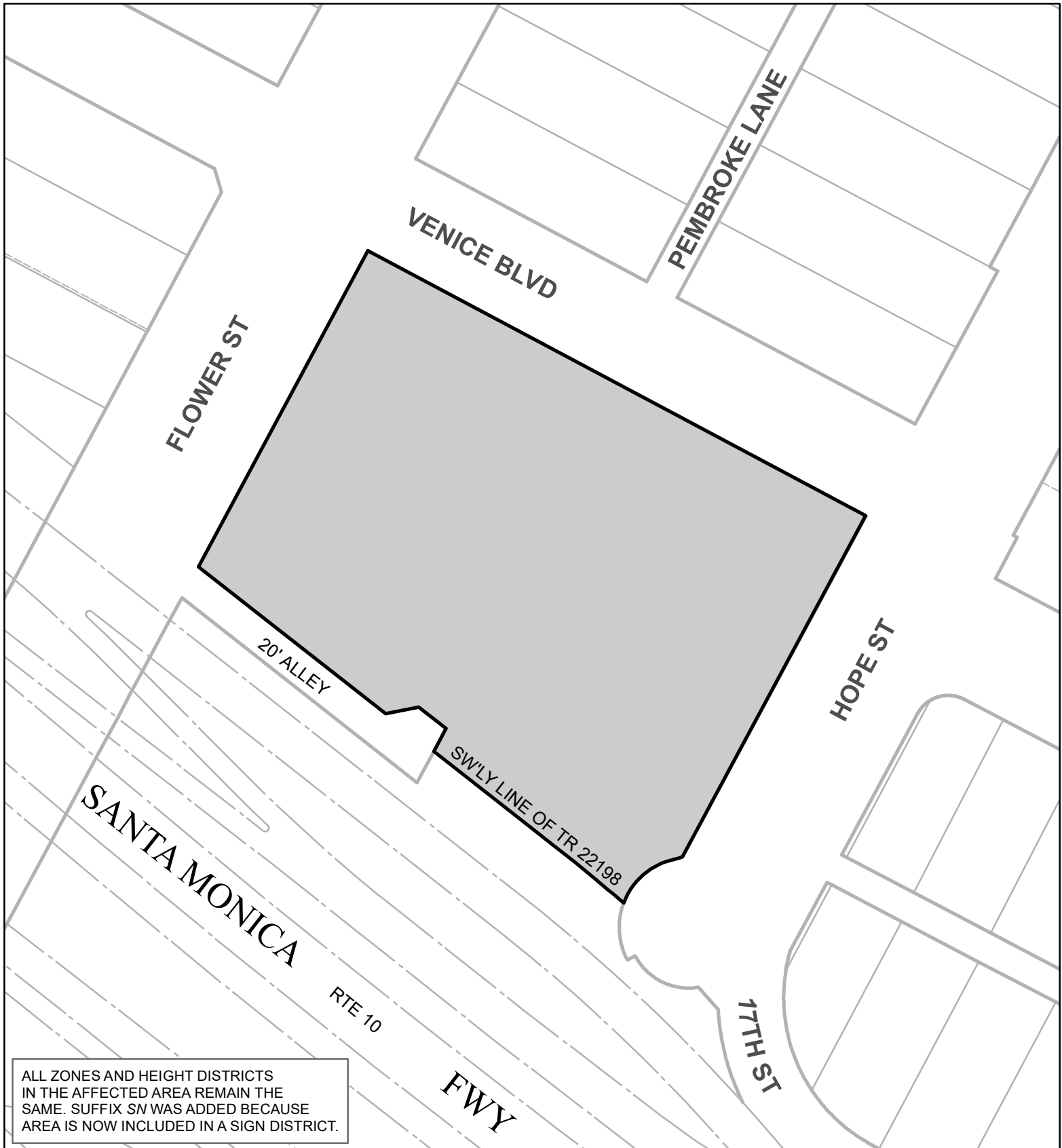
cc: Milena Zasadzien, Principal City Planner
Mindy Nguyen, Senior City Planner
More Song, City Planner

ORDINANCE NO. _____

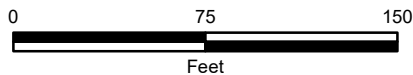
An ordinance amending Section 1.5.2 of Chapter 1A of the Los Angeles Municipal Code by amending the Zoning map.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. The Zoning Map, as established in Section 1.5.2 of the Los Angeles Municipal Code, is hereby amended by changing the zone classifications on the properties shown upon a portion of the zoning map attached thereto and made a part of Article 1, Chapter 1A of the Los Angeles Municipal Code, so that such portion of the zoning map shall set forth the zone as shown on the attached zoning map.



**SOUTH PARK TOWERS
SIGN DISTRICT**

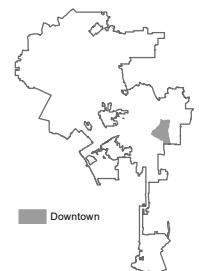


CPC-2018-3336-SN-TDR-CUB-SPR-MS

AA/Cf

070725

City of Los Angeles



DRAFT SOUTH PARK TOWERS SIGN DISTRICT
(AS MODIFIED BY THE CITY PLANNING COMMISSION ON JULY 10, 2025)

DRAFT

ORDINANCE NO. _____

An ordinance establishing the South Park Towers Sign District (Sign District) pursuant to the provisions of Section 13.11 of the Los Angeles Municipal Code (Code).

WHEREAS, the General Plan Framework identifies the South Park Towers Project (Project) site as within the Downtown Center, which is intended as the primary economic, governmental, and social focal point of Los Angeles, with an enhanced residential community, and encourages the expansion of expansion of business, tourism, and housing that distinguishes and uniquely identifies the Downtown Center;

WHEREAS, the Project Site is designated for Transit Core land uses and is located within the Downtown Community Plan area, which envisions dense centers of activity that connect users to a variety of attractions, and encourages a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism;

WHEREAS, the Project will be a mixed-use infill development incorporating commercial, hospitality, and residential uses with amenities for downtown residents and visitors to the City, supporting the City's goals of adding new hotel rooms in proximity to the Convention Center;

WHEREAS, the Project Site will require a unique and comprehensive program for on-and off-site signage that contributes to and enhances the identity of the Sign District area;

WHEREAS, a clear and consistent set of regulations established by this Sign District would provide a level of certainty for future signage for the site while remaining mindful of nearby sensitive residential uses and driver safety, providing signage compatible with the surrounding community character by limiting Digital Displays and Supergraphic Signs to Venice Boulevard and to the interior of the Project Site; and

WHEREAS, the Sign District will foster a vibrant urban environment with a unified aesthetic and sense of identity, by setting standards for uniform signage design, providing well-planned placement, design and architectural integration of signage with consideration for surrounding uses and architectural design, and improving pedestrian and traffic safety by directing functional wayfinding and building identification throughout the Project Site.

**NOW, THEREFORE,
THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

SECTION 1. ESTABLISHMENT OF THE SOUTH PARK TOWERS SIGN DISTRICT.

The City Council hereby establishes the South Park Towers Sign District (Sign District), which shall be that area of the City shown within the heavy solid line on **Map 1 - Sign District Boundary**, comprising approximately 1.7-acres of land, bounded by Venice Boulevard to the north, Flower Street to the west, an unnamed alley and the Interstate 10 Caltrans Right-of-Way to the south, and Hope Street to the east.

Map 1 - Sign District Boundary



SECTION 2. PURPOSE.

The Sign District is intended to:

- A.** Support and enhance the land uses and urban design objectives of the Downtown Community Plan;
- B.** Create a unique and recognizable identity through signage elements to enhance and contribute to the development of the South Park District of Downtown Los Angeles, draw visitors to the Convention Center and Los Angeles Sports and Entertainment District to benefit the local economy, and reduce lingering blight;
- C.** Permit a variety of signage elements to allow for creativity and flexibility in design over time;
- D.** Ensure that new signs are responsive to and integrated with the aesthetic character of the structures on which they are located;
- E.** Protect adjacent residential communities from potential adverse impacts by concentrating signage away from residential areas, setting standards for signage amounts, size, illumination and sign motion/animation, and to establish a program requiring the removal of blight; and
- F.** Coordinate the location and display of signs so as to enhance the pedestrian realm, minimize potential traffic hazards, protect public safety, and maintain compatibility with surrounding uses.

SECTION 3. APPLICATION OF SUPPLEMENTAL USE DISTRICT REGULATIONS.

- A. The regulations of this Ordinance are in addition to those set forth in the Planning and Zoning provisions of the Code. These regulations do not convey any rights not otherwise granted under the provisions and procedures contained in the Code or other relevant ordinances, except as specifically provided for in this Ordinance.
- B. Wherever this Ordinance contains provisions that establish regulations that are different from, more restrictive than, or more permissive than those contained in the Code, this Ordinance shall prevail.
- C. All signs authorized by this Ordinance must comply with applicable State and federal laws, including California's Outdoor Advertising Act (OAA) (Business and Professions Code Sections 5200-5486) and applicable safety provisions in the California Vehicle Code, including Vehicle Code Sections 21465, 21466, and 21466.5. Nothing in this Ordinance can or is intended to alter or avoid applicable State and federal requirements.

SECTION 4. DEFINITIONS.

Whenever the following terms are used in this Ordinance, they shall be construed as defined in this Section. Words and phrases not defined here shall be construed as defined in Section 4C.11 (Signs) or Section 14.3 (Glossary) of the Code.

Digital Display. A sign face, building face, or any building or structural component that displays still images, scrolling images, moving images, or flashing images, including video and animation, through the use of grid lights, cathode ray projections, light emitting diode displays, plasma screens, liquid crystal displays, fiber optics, or other electronic media or technology that is either independent of or attached to, integrated into, or projected onto a building or structural component, or that may be changed remotely through electronic means and that is located within the Sign District.

Off-Site Sign. A sign located within the Sign District that displays any message directing attention to a business, product, service, profession, commodity, activity, event, person, institution, or any other commercial message, which is generally conducted, sold, manufactured, produced, or offered or occurs elsewhere than within the boundaries of the Sign District.

On-Site Sign. A sign located within the Sign District that is other than an Off-Site Sign.

Supergraphic Sign. A sign, located within the Sign District, consisting of an image projected onto a wall or printed on vinyl, mesh or other material with or without written text, supported and attached to a wall by an adhesive and/or by using stranded cable and eye-bolts and/or other materials or methods, and that does not comply with the following provisions of the Code: Sections 4C.11.6.C.9. (Projecting Signs), 4C.11.6.C.5. (Marquee Signs), 4C.11.2. (Temporary Signs), 4C.11.1.E.3 (Original Art Murals, Vintage Original Art Murals & Public Art Installations).

SECTION 5. PROCEDURAL REQUIREMENTS.

- A. **Building Permits.** The Los Angeles Department of Building and Safety (LADBS) shall not issue a permit for a sign, a sign structure, sign illumination, or alteration of an existing sign within the Sign District unless the sign complies with: (1) the requirements of this Ordinance

as determined by the Director of Planning (Director); and (2) applicable requirements of the Code and State and federal laws.

- B. Director Sign-Off Required.** With respect to the following signs, only a ministerial Director Sign-Off on the permit application will be required prior to issuance by LADBS of a building permit for a sign within the Sign District. An application for a Digital Display or Supergraphic Sign should be submitted at the same time as an application for the new building or upgrades to an existing façade of a building on which such sign is proposed to be located, as feasible:

1. Digital Displays which are On-Site Signs
2. Supergraphic Signs which are On-Site Signs

The Director shall approve the permit if the sign is within the Sign District and otherwise complies with all the applicable requirements of this Ordinance and Appendix A (Conceptual Sign Plans), the applicable requirements of the Code, and State and federal laws. The Director's approval shall also be indicated by stamping and dating the permit plans.

- C. Exempt Signs, Murals, and Art Installations.** LADBS permit applications for the following sign types, Original Art Murals, and Public Art Installations shall be subject to LADBS review and approval, and/or Department of Cultural Affairs review and approval, and the applicable requirements of the Code, but are exempt from Director's review and do not require a Director's Sign-Off:

1. Awning Signs
2. Illuminated Canopy Sign
3. Marquee Signs
4. Monument Signs
5. Original Art Murals
6. Pedestrian Sign
7. Projecting Sign
8. Public Art Installations
9. Roof Signs
10. Temporary Signs
11. Wall Signs
12. Window Signs

- D. Project Compliance.** LADBS shall not issue a permit for the following signs unless the Director has issued a Project Compliance approval, pursuant to the procedures set forth in Section 13B.4.2 (Project Compliance) of the Code and the applicable standards set forth in Section 7 (General Requirements) and Section 8 (Standards for Specific Types of Signs) of

this Ordinance. An application for a Digital Display or Supergraphic Sign should be submitted at the same time as an application for the new building or upgrades to an existing façade of a building on which such sign is proposed to be located, as feasible:

1. Digital Displays which are Off-Site Signs
2. Supergraphic Signs which are Off-Site Signs

E. Requests for Deviations, Modifications, and Interpretations of Regulations.

1. The procedures for adjustments, exceptions, and interpretations to this Ordinance shall follow the procedures set forth in Section 13B.4 (Specific Plan Implementation) of the Code. In addition, an adjustment process may be utilized for an adjustment to any sign locations which are not in substantial conformance with Appendix A (Conceptual Sign Plans), but otherwise are consistent with the intent and purposes of the Sign District, do not individually or in the aggregate exceed the size limits under Section 7.A.1 (Digital Displays, Sign Area) or Section 7.B.1 (Supergraphic Signs, Sign Area) of this Ordinance, and do not exceed any applicable illumination standards of the Sign District, Code, or other applicable law. For the purposes of this Ordinance, a sign shall be considered in substantial conformance if it is within one story in height on the vertical axis and 10 feet on the horizontal axis from the location depicted in Appendix A (Conceptual Sign Plans). However, under no circumstance may the location change of an Off-Site Sign be to a location that is primarily visible from the adjacent freeway.
2. The procedures for modifications of entitlement shall follow the procedures set forth in Section 13B.5.4 (Modification of Entitlement) of the Code. In addition, a Modification of Entitlement process may be utilized for a modification to any sign, any sign support structure or to the Appendix A (Conceptual Sign Plans) that results in a change of a sign from a Digital Display to a Supergraphic Sign.
3. The procedures for amendments of this Ordinance shall follow the procedures set forth in Section 13B.1.2 of the Code.

SECTION 6. GENERAL REQUIREMENTS.

- A. General Requirements of Code.** Unless specified in this Ordinance to the contrary, the general sign requirements set forth in the Code and the underlying CX3 Use District shall apply to this Sign District for permits, plans, design and construction, materials, street address numbers, identification, maintenance, prohibited locations and sign illumination. However, Digital Displays and Supergraphic Signs do not count towards the total sign area allocation of four square feet per linear foot of building frontage as identified in Section 4C.11.5.C.2 (Total Sign Area Allowed) of the Code. A building permit shall be obtained from LADBS, for any signs, sign structures, and/or sign alterations, other than changes to or replacement of sign face copy, in accordance with the applicable provisions of the Code.
- B. Permitted Signs.** Except as otherwise prohibited in Section 6.C (Prohibited Signs) of this Ordinance, and notwithstanding Section 4C.11.1.C.8 (Prohibited Signs) of the Code, all signs described and regulated in Section 7 (Standards for Specific Types of Signs) of this Ordinance, all signs otherwise permitted by the Code, and all previously legally permitted signs shall be permitted within the Sign District subject to applicable State and federal law.
- C. Prohibited Signs.** The following signs shall be prohibited:

1. Inflatable Devices
 2. Pole Signs
 3. Any sign not specifically authorized by this Ordinance or by the Code or that does not comply with applicable State and federal laws
- D. Freeway Exposure.** Signs that are viewed primarily from a freeway, as defined in Section 4C.11.1.C.6.b (Freeway Exposure) of the Code, are prohibited.
- E. General Sign Area and Location Requirements.** The sign area and location of signage is subject to standards identified in Sections 6 (General Requirements) and Section 7 (Standards for Specific Types of Signs) of this Ordinance, Section 4C.11.1.C.9 (Prohibited Locations) of the Code, and applicable provisions of State and federal law, including the OAA and the Vehicle Code. In addition, no sign shall be placed over the exterior surface of any opening of a building, including its windows, doors, and vents, unless the Los Angeles Fire Department (LAFD) determines, in writing, that the sign would not create a hazardous condition.
- F. Illumination.** All signs may be illuminated by either internal or external means. The illumination regulations set forth in the Code shall apply except as set forth herein. Methods of signage illumination may include but are not limited to electric lamps, such as neon tubes; fiber optics; incandescent lamps; LED; LCD; cathode ray tubes exposed directly to view; shielded spotlights and wall wash fixtures. In addition, signage shall be subject to the following regulations:
1. **Lighting onto Residential Units.** All externally illuminated signs shall be designed, located, or screened so as to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit. If signs are to be externally lit, the source of the external illumination shall be shielded from public view on adjoining or other residential or commercial lots.
 2. **Sign Illumination Limitations.** In accordance with Section 4C.11.1.C.3 (Sign Illumination Limitations) of the Code, no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. However, sign illumination for Digital Displays and Supergraphic Signs shall be exempt from any applicable provisions from Section 4C.10.1 (Outdoor Lighting) of the Code.
 3. **Reflective Materials.** Signage shall not use highly reflective materials such as mirrored glass.
 4. **Green Code.** All light sources, including illuminated signage, shall comply with the applicable provisions of CALGreen (Part 11 of Title 24, California Code of Regulations), California Energy Code (Part 6 of Title 24, CCR) 130.3 and Section 140.8 and the Green Code of the City of Los Angeles.
 5. **Digital Display Illumination Standards.**
 - a. **Brightness.** Digital Displays shall have a nighttime luminance, from sunset to

sunrise, no greater than 300 candelas per square meter (cd/m^2), all white, and a daytime brightness, from sunrise to sunset, no greater than 5,000 cd/m^2 . The Digital Displays shall transition smoothly at a consistent rate from their daytime luminance to their maximum permitted nighttime luminance levels, beginning not less than 45 minutes prior to sunset, and concluding not more than 45 minutes after sunset. After sunrise, signs will transition smoothly from the applicable nighttime maximum luminance of 300 cd/m^2 for 45 minutes, up to their daytime luminance.

- b. **Adjustment of Luminance.** Each Digital Display shall be fully dimmable and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day and applicable lighting standards.
- c. **Beam Spread.** All light emitting diodes used within a Digital Display shall have a maximum horizontal beam spread of 165 degrees and maximum vertical beam spread of 90 degrees, facing primarily downwards and shall conform to the applicable provisions of the Code as well as federal and State laws, including the California Business and Professions Code and Vehicle Code.

G. Sign Illumination Plan. An initial signage illumination plan for the Digital Displays is provided as Appendix A (Conceptual Sign Plans), attached to Appendix K (Lighting Technical Study) in the SCEA (ENV-2018-3337-SCEA for the South Park Towers Project). No further signage illumination plan shall be required for signs that conform to the Appendix A (Conceptual Sign Plans). Signs that are not in conformance with the Appendix A (Conceptual Sign Plans) may be required, in addition to all other enforcement mechanisms and liabilities under the Code, to conform to a signage illumination plan imposed by the City or a court. If a new or revised signage illumination plan is required, it shall be submitted to the Director as part of the Project Compliance or other entitlement procedures for Digital Displays set forth in Section 5.D (Project Compliance) and Section 5.E (Requests for Deviations, Modifications, and Interpretations of Regulations) of this Ordinance. The signage illumination plan shall be prepared by a lighting design expert, and those portions of the plan setting forth the wattage draw must be certified and stamped by an electrical engineer certified by the State of California. The plan shall include specifications for all illumination, including maximum luminance levels, and shall provide for the review and monitoring of the displays by the City at the expense of the owner of the sign in order to ensure compliance with the regulations of this section.

1. Illumination Testing Protocol for Digital Displays. Prior to the operation of any Digital Display, the applicant shall conduct testing to indicate compliance with the illumination regulations of this Ordinance, and provide a copy of the results, along with a certification from an LADBS approved testing agency, to the Director and to LADBS stating that the testing results demonstrate compliance with the requirements of this Ordinance. The testing shall be at the applicant's expense and shall be conducted as follows:

- a. **Illuminance Testing.** In order to determine whether the illumination complies with the Code and the requirements of this Ordinance, a representative testing site shall be established on or next to those light sensitive receptors, as defined by the City's CEQA Guidelines, outside of the Sign District area, which have the greatest exposure to signage lighting on each of the four facades of the Project. A light meter mounted to a tripod at eye level, facing the project buildings, shall be calibrated and measurements taken to determine ambient light levels with the sign

on. A reading shall then be taken to determine the ambient light levels with the illuminated sign on and off. The difference between the two measurements shall be the amount of light the sign casts onto the sensitive receptor.

- b. **Re-testing.** In addition, if as a result of a complaint or otherwise, LADBS may undertake a preliminary investigation and determine if it has cause to believe the Project's signage lighting is not in compliance with this Ordinance, the Code, or other applicable laws. LADBS may request, at the expense of the applicant or its successor, that the testing protocol outlined in this section be implemented to determine compliance. If the testing reveals that the signage is not in compliance with this Ordinance, the applicant or its successor shall immediately adjust the signage illumination to bring it into compliance and shall be subject to all of the enforcement provisions of the Code including administrative citations for continuing daily violations.

H. **Refresh Rate.** The Refresh Rate is the rate at which a Digital Display may change content. The Refresh Rates are as follows and shall apply to Digital Displays as set forth in Section 7.A (Standards for Specific Types of Signs, Digital Displays) of this Ordinance.

- 1. **Controlled Refresh Rate.** The Controlled Refresh Rate shall be no more frequent than one refresh event every eight seconds, with an instant transition between images. The sign image must remain static between refreshes.
- 2. **Full Animation.** Full Animation shall permit images, videos, animation, parts and/or illumination that change, move, stream, scroll, or otherwise incorporate motion to change at an unrestricted rate.
- 3. **Vehicular Safety Features.** Digital Displays which are visible from any public street shall incorporate the following measures:
 - a. Digital Displays shall not incorporate driver interaction features.
 - b. Digital Displays shall not use colors or images that replicate or could be confused with traffic safety signage.
 - c. Digital Displays shall not use stroboscopic or flashing images.
 - d. Digital Displays shall use dissolves for transitions between static and animated content.

I. **Visual Maintenance.** All signs shall be maintained to meet the following criteria at all times:

- 1. The building and ground area around the signs shall be properly maintained. All unused mounting structures, hardware and wall perforation from any abandoned/removed sign shall be removed and building surfaces shall be restored to their original condition.
- 2. All sign copy shall be properly maintained and kept free from damage and other unsightly conditions, including graffiti.
- 3. All sign structures shall be kept in good repair and maintained in a safe and sound condition and in conformance with all applicable codes.

4. Razor wire, barbed wire, concertina wire, or other barriers preventing unauthorized access to any sign shall be hidden from public view.
5. No access platform, ladder, or other service appurtenance, visible from the sidewalk, street, or public right-of-way, shall be installed or attached to any sign structure.
6. Signs that are no longer serving the current tenants, including sign structures, shall be removed and the building facades originally covered by the signs shall be repaired and/or resurfaced with materials and colors that are compatible with the facades.

J. Hazard Review.

1. In connection with the adoption of this Ordinance, the City has completed the initial review otherwise required under Section 4C.11.1.C.5 (Hazard to Traffic) of the Code for signs that adhere to the specifications set forth in this Ordinance and, therefore, shall require no further hazard or Code compliance review, except as set forth below.
2. In the event: (i) any Digital Display is not in substantial conformance with the Appendix A (Conceptual Sign Plan); (ii) any sign does not adhere to the requirements of this Ordinance or requires an adjustment, exception or amendment to this Ordinance; or (iii) any sign that utilizes New Technologies, as set forth in Section 6.K (New Technologies) of the Ordinance, the proposed sign will require a permit from LADBS; and prior to submission to LADBS, must be submitted to the Los Angeles Department of Transportation (LADOT) for hazard evaluation and determination per Section 4C.11.1.C.5 (Hazard to Traffic) of the Code. Until LADOT determines that any such sign, individually or in the aggregate with other signs authorized under this Ordinance, do not constitute a hazard, LADBS shall not issue a permit for the sign or sign structure.
3. The City retains all rights to regulate all signs or to change the regulations applicable to any sign or to the Sign District created by this Ordinance without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity. In the event the City receives evidence or otherwise reasonably believes that any sign, including any sign that is in substantial conformance with the Appendix A (Conceptual Sign Plans) and adheres to the requirements of this Ordinance, is or is being operated in a manner that is, or otherwise constitutes, a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or which creates a condition that endangers the safety of persons or property, the City may act immediately to address the hazard or danger without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity. In addition, LADBS may refer any sign to LADOT for hazard evaluation and determination per Section 4C.11.1.C.5 (Hazard to Traffic) of the Code, and the City may order the suspension or modification of operations of any sign pending the LADOT's hazard review and determination without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity. If LADOT determines that a sign constitutes a hazard or creates a hazard or danger to traffic, pedestrians or other persons or property, the City may make the suspension or modification of the hazardous operation of the sign permanent without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity.

- K. New Technologies.** The Director may permit the use of any technology or material which did not exist as of the effective date of this Ordinance, provided that the material is approved by LADBS and that the technology or material is permitted under applicable State and federal

laws, utilizing the Director's Interpretation procedure outlined in Section 13B.4.6 (Specific Plan Interpretation) of the Code, if the Director finds that such technology or material is consistent with the regulations described herein.

- L. Alterations, Repairs or Rehabilitation.** Any alteration, repair or maintenance work on a legally permitted sign or sign structure shall be governed by the Code and applicable State and federal laws.
- M. Materials.** The materials, construction, application, location and installation of any sign shall be in conformance with the Los Angeles Building Code and the Los Angeles Fire Code.

SECTION 7. STANDARDS FOR SPECIFIC TYPES OF SIGNS.

A. Digital Displays. Digital Displays shall comply with the following regulations:

- 1. Sign Area.** An individual Digital Display shall not exceed 664 square feet in sign area. The total combined area of all Digital Displays in the Sign District shall not exceed 1,368 square feet in area.
- 2. Number and Location.** Digital Displays shall be installed in substantial conformance with the number and locations identified in the Appendix A (Conceptual Sign Plans), provided that the total of all Digital Displays shall not exceed 1,368 square feet. For the purposes of this Ordinance, a sign shall be considered in substantial conformance if it is within one story on the vertical axis and 10 feet on the horizontal axis from the location depicted in the Appendix A (Conceptual Sign Plans), provided that a Lighting Study demonstrates that the Digital Display conforms with all illumination standards of this Ordinance. In addition, any location for a Digital Display in the Appendix A (Conceptual Sign Plans) may instead be replaced with a Supergraphic Sign.
- 3. Design.**
 - a. Digital Displays may use grid lights, cathode ray projections, light emitting diode displays, plasma screens, liquid crystal displays, fiber optics, or other electronic media or technology developed in the future but may not include strobe lights, flashing lights, revolving beacon, or any other technology that interferes with traffic safety or visibility or is prohibited by applicable State or federal law.
 - b. Digital Displays shall be integrated into the architectural design of the building and shall align with major building elements such as window banding or vertical changes in material or texture. Signs which are in substantial conformance as to the design indicated in the Appendix A (Conceptual Sign Plans) are deemed to meet the requirement for architectural compatibility.
- 4. Illumination.** Digital Displays shall be internally illuminated and subject to the applicable illumination standards of Section 6 (General Requirements) of this Ordinance.
- 5. Refresh Rates and Operation.**
 - a. Digital Displays not visible from the freeway may be permitted the Full Animation Refresh Rate.

- b. Digital Displays shall operate only during the time period beginning at 7:00 a.m. and ending at 12:00 a.m.
 - c. No Digital Display shall be made operative until a Temporary or Permanent Certificate of Occupancy has been issued for the building on which the Digital Display is located.
 - 6. **On-Site and Off-Site Standards.** Digital Displays may be On-Site or Off-Site Signs. Sections 4C.11.3.C.1 (Location), 4C.11.3.C.2 (Area), 4C.11.3.C.3 (Height), and 4C.11.3.C.4 (Spacing) of the Code for Off-Site Signs shall not apply.
 - 7. **Sign Reduction Program.** As set forth under Section 8 (Sign Reduction) of this Ordinance, no building permit shall be issued for any Off-Site Digital Display prior to approval of a Sign Reduction Plan and Project Compliance for that sign, incorporating the terms and sign reduction ratios of Section 8 (Sign Reduction) of this Ordinance. Digital Displays that are On-Site Signs are exempt from this requirement.
- B. Supergraphic Signs.** Supergraphic Signs shall comply with the following regulations:
- 1. **Sign Area.** In lieu of a Digital Display as permitted under Section 7.A of this Ordinance, a Supergraphic Sign may instead be permitted. The replacement Supergraphic Sign would then be subject to the sign area limitations for Digital Displays, as indicated in Section 7.A above.
 - 2. **Number and Location.** Replacement Supergraphic Signs shall be installed in substantial conformance with the number and locations identified in the Appendix A (Conceptual Sign Plans), provided that the total of all Digital Displays or replacement Supergraphic Signs shall not exceed 1,368 square feet. For the purposes of this Ordinance, a sign shall be considered in substantial conformance if it is within one story on the vertical axis and 10 feet on the horizontal axis from the location depicted in the Appendix A (Conceptual Sign Plans).
 - 3. **Design.**
 - a. A Supergraphic Sign that is comprised of vinyl or other material may be attached to a wall with an adhesive or by mechanical means approved by LADBS and the LAFD, if applicable.
 - b. Supergraphic Signs comprised of mylar or other film-like transparent material, such as perforated vinyl, may be applied directly to windows subject to the provisions of Section 6.D of this Ordinance.
 - c. Supergraphic Signs may adhere to windows provided that such signs have been scored into ten smaller portions for each glass panel that the sign covers or as otherwise approved by the LAFD.
 - d. Supergraphic Signs shall not obstruct outward views from windows.
 - e. Supergraphic Signs shall be integrated into the architectural design of the building and shall align with major building elements such as window banding or vertical changes in material or texture. Signs which are in substantial conformance as to the design indicated in Appendix A (Conceptual Sign Plans) are deemed to

meet the requirement for architectural compatibility.

4. **Illumination.** Supergraphic Signs may be non-illuminated, or externally illuminated with the light source shielded from view.
5. **Operation.** No Supergraphic Sign shall be installed until a Temporary or Permanent Certificate of Occupancy has been issued for the building on which the Supergraphic Sign is located.
6. **On-Site and Off-Site Standards.** Supergraphic Signs may be On-Site or Off-Site Signs. Sections 4C.11.3.C.1 (Location), 4C.11.3.C.2 (Area), 4C.11.3.C.3 (Height), and 4C.11.3.C.4 (Spacing) of the Code for Off-Site Signs shall not apply.
7. **Sign Reduction Plan.** As set forth under Section 8 (Sign Reduction) of this Ordinance, no building permit shall be issued for any Off-Site Supergraphic Sign prior to approval of a Sign Reduction Plan and Project Compliance for that sign, incorporating the terms and sign reduction ratios of Section 8 of this Ordinance. Supergraphic Signs that are On-Site Signs are exempt from this requirement.

SECTION 8. SIGN REDUCTION.

Sign reduction is required for all Digital Displays and Supergraphic Signs that are Off-Site Signs. An applicant shall seek approval of a Sign Reduction Plan by filing a Project Compliance application with the Director, pursuant to Section 13B.4.2 (Project Compliance) of the Code. The application shall demonstrate compliance with the following requirements:

- A. **Removal of Off-Site Signage.** A property owner or ground lessee within the Sign District area shall be permitted to install Digital Displays and Supergraphic Signs that are Off-Site Signs only if the property owner or ground lessee demonstrates the removal of existing, legally permitted Off-Site Signs, including non-conforming Off-Site Signs, in existence as of the effective date of this Ordinance, that are removed from any other property located within the boundaries of Council District 14 or the Downtown Community Plan, based upon the following sign reduction ratios:
 1. **Supergraphic Signs.** Each square foot of new Supergraphic Sign area shall be offset by a minimum reduction of one square feet of existing Off-Site Sign area.
 2. **Digital Displays.** Each square foot of new Digital Display sign area shall be offset by a minimum reduction of two square feet of existing Off-Site Sign area.
- B. **Proof of Legal Status, Removal Rights and Indemnification.** At the time of application for each Off-Site Sign, the Sign Reduction Plan shall not be approved unless the applicant submits the following with the application form:
 1. **Valid Building Permit.** A valid building permit, to the extent available, demonstrating that the sign to be removed constitutes a legal use.
 2. **Property Owner's Statement.** A written statement from the owner of the property from which the sign(s) will be removed, and the owner of the sign(s) to be removed, attesting that they have the legal right to remove the sign at issue and agree that once removed, the sign(s) at issue may not be reinstalled. This written statement must be signed under penalty of perjury and notarized.

- 3. Indemnification.** An executed agreement from the applicant promising to defend and indemnify the City against any and all legal challenges filed by a third party relating to the removal of the sign(s).
- C. Proof of Sign Removal.** With respect to each removed Off-Site Sign, the applicant shall submit a final demolition permit and photographic evidence that such sign has been removed prior to the issuance of any building permit for any Off-Site Digital Display or Supergraphic Sign subject to this Section of this Ordinance.
- D. Transfer of Rights.** The removal of Off-Site signage pursuant to this Section shall not be used to install signs on any property outside of this Sign District, or in violation of the requirements of this Ordinance. Under no circumstances shall the removal of Off-Site signage be credited more than once for the approval of an Off-Site Digital Display or Supergraphic Sign within the Sign District.

SECTION 9. SEVERABILITY.

If any provision of this Ordinance or its application to any person or circumstance is held to be unconstitutional or otherwise invalid by any court of competent jurisdiction, the invalidity shall not affect other provisions, clauses or applications of said Ordinance, which can be implemented without the invalid provision, clause or application, and to this end, the provisions and clauses of this Ordinance are declared to be severable. The City Council hereby declares that it would have passed this Ordinance and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.

SECTION 10.

The City Clerk shall certify to the passage of this Ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; and one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

SOUTH PARK TOWERS

SIGN DISTRICT

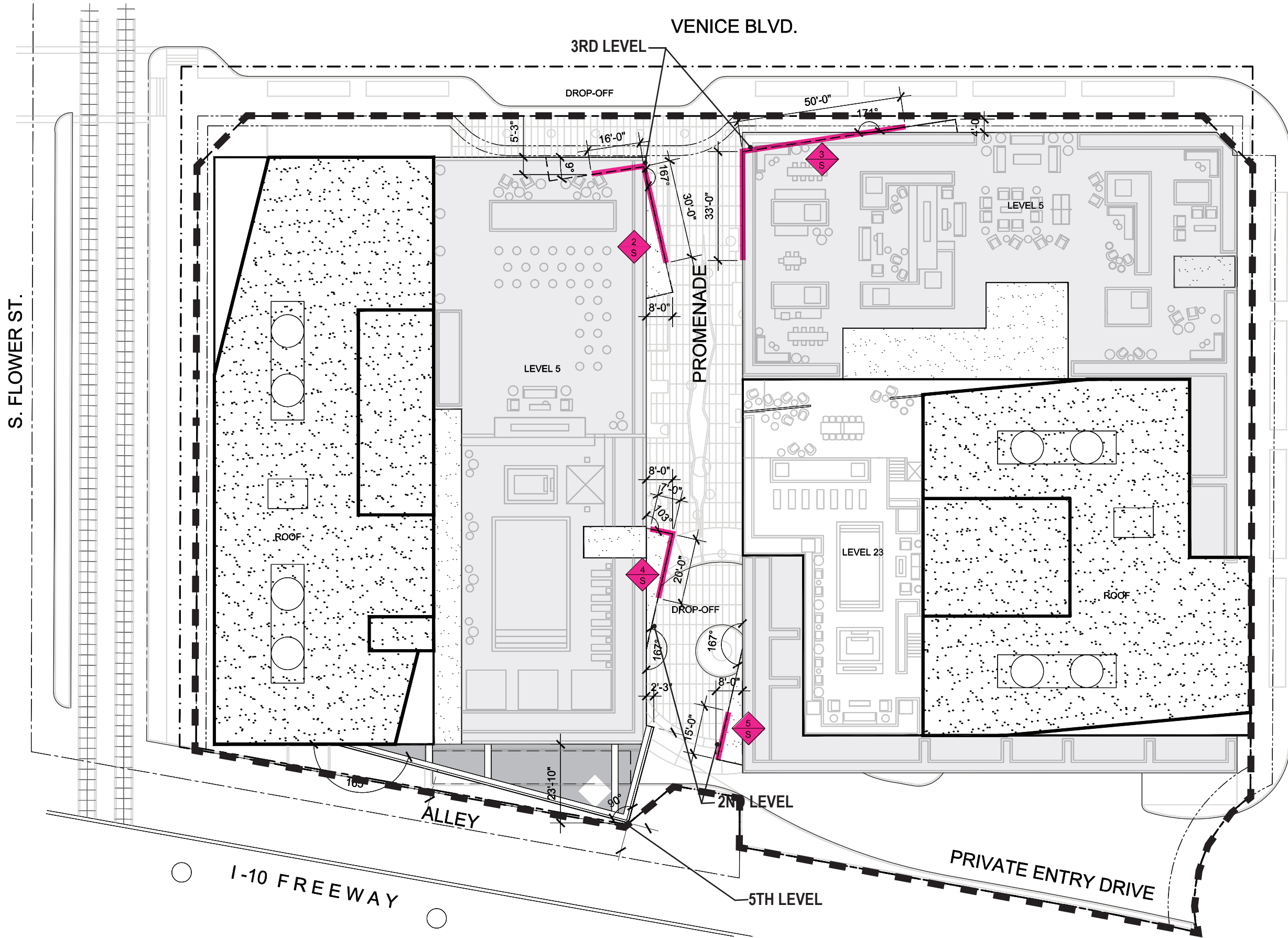
APPENDIX A - CONCEPTUAL SIGN PLAN

SHEETS

- 01 Sign Matrix
- 02 Sign Plan
- 06 Signs 2 & 3
- 07 Signs 2 & 3
- 08 Street View from North
- 10 Aerial View from North

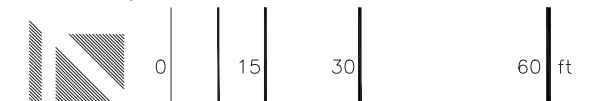
SIGN TYPE	ID #	SIGN HEIGHT	SIGN WIDTH	MAX ANGLE FROM WALL	MAX PROJECTION FROM WALL	AREA PER SIGN FACE	TOTAL AREA PER SIGN	HEIGHT TO BOTTOM	HEIGHT TO TOP	FREEWAY FACING / VISIBLE	LEVEL
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-2	8FT	16FT	9°	-5FT3IN	128 SF	268 SF	27FT	35FT	NO	3
		8FT	30FT	167°	8FT	240 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-3	8FT	50FT	171°	4FT	400 SF	664 SF	27FT	35FT	NO	3
		8FT	33FT	0°	0FT	264 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-4	8FT	7FT	103°	8FT	56 SF	216 SF	17FT	25FT	NO	2
		8FT	20FT	167°	8FT	160 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-5	8FT	15FT	167°	8FT	120 SF	120 SF	17FT	25FT	NO	2

NOTE: STRUCTURAL PLANS AND CALCULATIONS STAMPED AND SIGNED BY A LICENSED ENGINEER SHOWING THE SIGN CONSTRUCTION MATERIALS AND METHOD(S) OF ATTACHMENT TO THE BUILDING SHALL BE PROVIDED AT TIME OF PERMIT.



SIGN TYPE LEGEND

 NON-FREEWAY FACING / VISIBLE
SUPERGRAPHIC OR DIGITAL DISPLAY SIGN



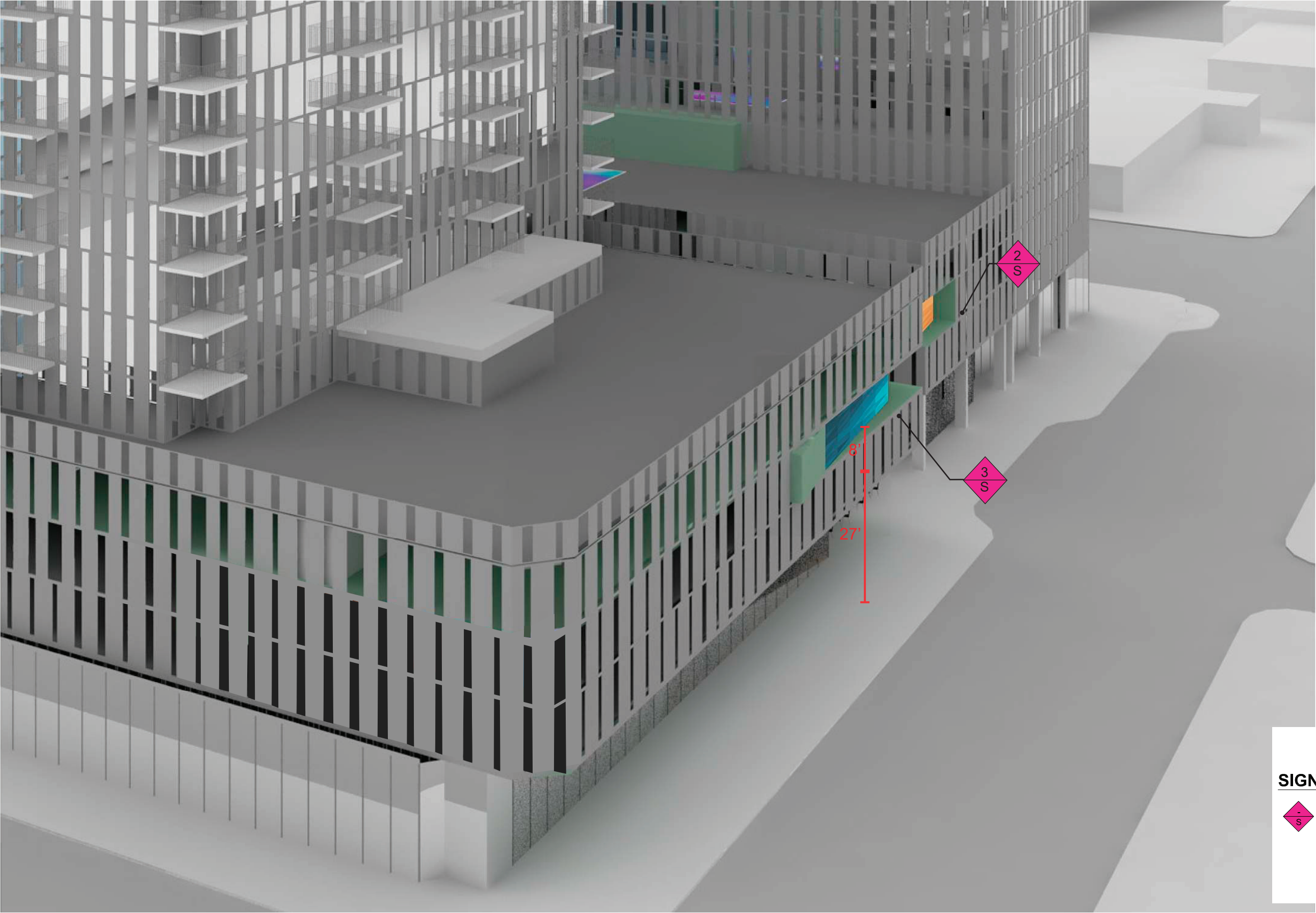
02

Ground Level Plan

South Park Towers Sign District
Appendix A - Conceptual Sign Plan

07 10 25





SIGN TYPE LEGEND

 NON-FREEWAY FACING / VISIBLE
SUPERGRAPHIC OR DIGITAL DISPLAY SIGN



SIGN TYPE LEGEND



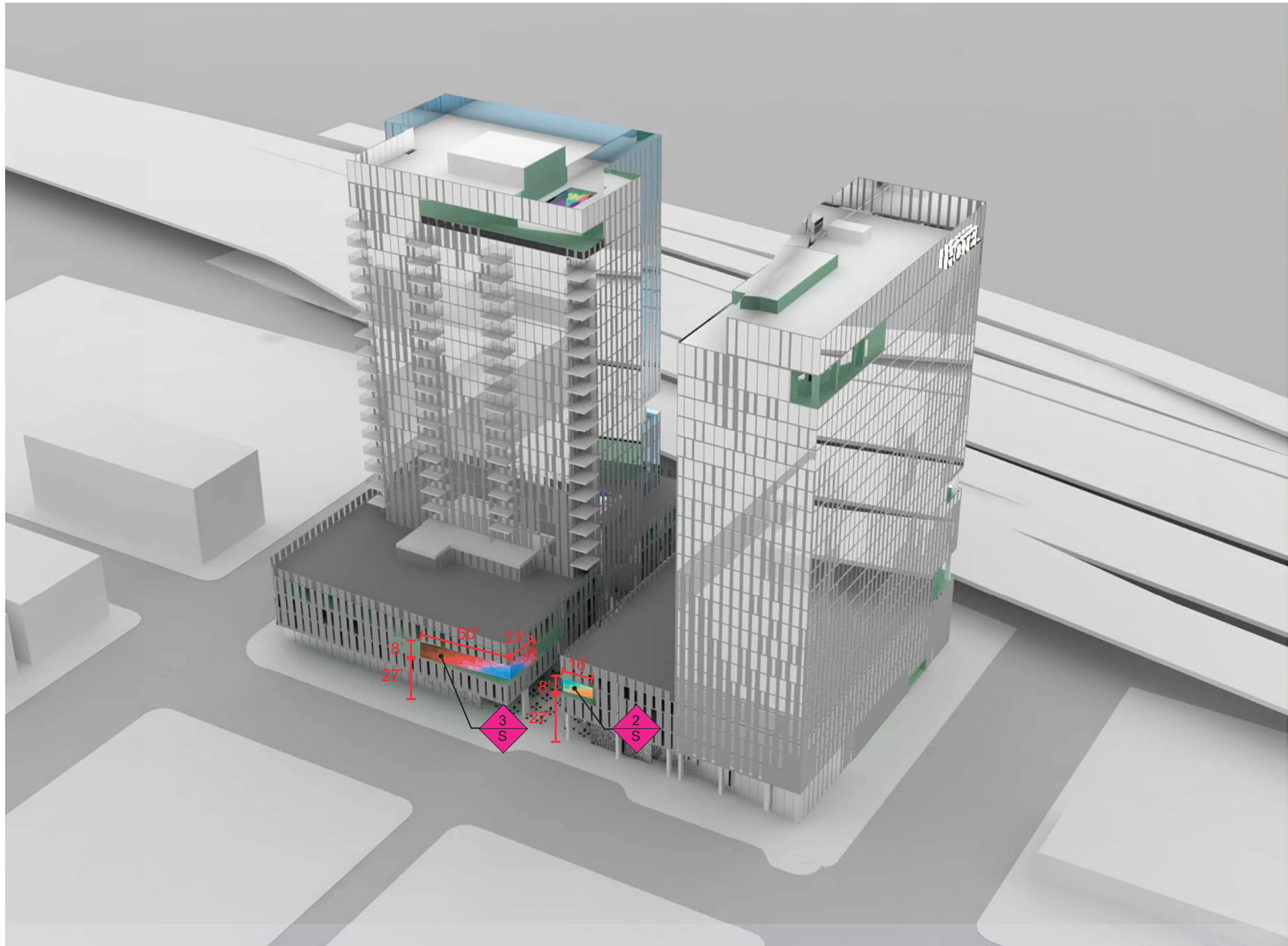
NON-FREEWAY FACING / VISIBLE
SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

08

Street View from North

South Park Towers Sign District
Appendix A - Conceptual Sign Plan

07 10 25



SIGN TYPE LEGEND



NON-FREEWAY FACING / VISIBLE
SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

CONDITIONS OF APPROVAL

(As Modified by the City Planning Commission at its meeting on July 10, 2025)

Pursuant to LAMC Sections 14.5.6, 12.24 W.1, 12.24 S, 16.05, and 12.21 G, the following conditions are hereby imposed upon the use of the subject property.

Transfer of Floor Area Conditions

1. **Floor Area.** The Project shall not exceed a total floor area of 452,630 square feet. The Transfer Payment and Public Benefit Payment shall be pro-rated to the amount of TFAR being acquired in the event the maximum amount of TFAR is not required. The lot area used to calculate the base floor area shall be 75,503 square feet with a 3:1 FAR. The buildable area of a Transit Area Mixed Use Project used to calculate the maximum floor area shall be 110,035 square feet with a 6:1 FAR. Changes to the Project that result in a 20 percent or greater decrease in floor area shall require new entitlements. The Department of City Planning reserves the right to confirm the accuracy of the requested floor area, and to verify the calculation of the Transfer Payment and Public Benefit Payment at any time prior to the issuance of the building permit, or 24 months after the final approval of the Transfer and the expiration of any appeals or appeal period or any extensions permitted by the Director in accordance with Section 14.5.11 of the LAMC.
2. **TFAR Transfer Payment.** The Project is subject to and shall pay a TFAR Transfer Payment in conformance with LAMC Sections 14.5.6 through 14.5.12. Such payment shall be based on the actual amount of floor area transferred to the Project Site.
 - a. The total amount of floor area authorized to be transferred from the Los Angeles Convention Center (Donor Site) by this action shall not exceed 226,121 square feet. The total floor area of the Project Site (Receiver Site) shall not exceed 452,630 square feet.
 - b. The Applicant shall provide a TFAR Transfer Payment consistent with LAMC Section 14.5.10 in the amount of five dollars per square foot of floor area transferred, equal to \$1,130,605 for the transfer of 226,121 square feet from the Los Angeles Convention Center located at 1201 Figueroa St (Donor Site) to the Project Site (Receiver Site).
3. **Public Benefit Payment.** The Project is subject to and shall pay a Public Benefit Payment in conformance with LAMC Sections 14.5.6 through 14.5.12.
 - a. The Applicant shall provide a Public Benefit Payment consistent with LAMC Section 14.5.9 in the amount of \$2,275,495 provided that at least 50 percent (\$1,137,748) of the Public Benefit Payment consists of a cash payment by the Applicant to the Public Benefit Payment Trust fund. Direct Provision payments shall be paid directly to the recipients. Proof shall be provided in the form of a cleared check or bank statement and a letter signed by the Executive Director of each organization. Consistent with the LAMC, the Project shall provide 50 percent (\$1,137,747) of the Public Benefit Payment as a direct provision payment by directly providing the following public benefit:
 - i. A payment to the City of Los Angeles Council District 14 Public Benefits Trust Fund for Affordable Housing in the amount of \$1,137,747. The funds shall be utilized for construction and operation of affordable housing developments.

- b. At the time of issuance of the Certificate of Occupancy for the Project, the Applicant shall provide an update to the file from the recipient of direct provisions detailing how the money has been spent thus far.
- c. The Applicant shall pay the required Public Benefit Payment, less the cost of the Direct Provision of Public Benefits, in cash to the Public Benefit Trust Fund, pursuant to the terms of Ordinance No. 181,574 (Article 4.5 of the LAMC). The Public Benefit Payment proof of cash payment and direct provision of public benefits is required upon the earliest occurrence of either:
 - i. The issuance of the building permit for the Project; or
 - ii. Twenty-four months after the final approval of the Project and the expiration of any appeals or appeal period.

Should the Applicant not make the required payments within the specified time, the subject approval shall expire, unless extended by the Director in writing.

- 4. The Project shall comply with any urban design standards and guidelines adopted by the City Planning Commission for the area, including the Downtown Design Guide, and any other applicable design guidelines.

Conditional Use Permit Conditions

- 5. The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission or its designee to impose additional corrective Conditions, if, in their opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
- 6. **Use.** Authorized herein is the sale and dispensing of a full line of alcoholic beverages for on-site consumption only in conjunction with a proposed hotel. The grant shall be subject to the following limitations:
 - a. Alcoholic beverage service shall be permitted within the following areas of the hotel:
 - Minibars in the 300 new guest rooms
 - In-room dining (room service) in the 300 new guest rooms
 - A 950 square-foot bar on Level 1
 - A 950 square-foot lounge on Level 1
 - A 1,200 square-foot indoor dining room on Level 1
 - A 575 square-foot outdoor dining area on Level 1
 - A maximum of six meeting rooms on Level 5 encompassing a total of 6,125 square feet
 - A 5,200 square-foot outdoor event terrace on Level 5
 - A 4,281 square-foot outdoor pool and sun terrace on Level 5
 - A 1,470 square-foot outdoor terrace on Level 9
 - b. Seating shall be limited to the following:
 - A maximum of 38 indoor seats within the bar on Level 1
 - A maximum of 38 indoor seats within the lounge on Level 1
 - A maximum of 65 indoor seats within the indoor dining room on Level 1
 - A maximum of 38 outdoor seats within the outdoor dining area on Level 1

- A maximum of 262 total indoor seats within the six meeting rooms on Level 5
 - A maximum of 350 outdoor seats within the event terrace on Level 5
 - A maximum of 42 outdoor seats within the pool and sun terrace on Level 5
 - A maximum of 10 outdoor seats within the terrace on Level 9
- c. The number of seats shall not exceed the maximum allowable occupant load as determined by the Department of Building and Safety.

7. Hours of Operation.

- a. Hours of operation for alcoholic beverage service within the following areas of the hotel shall be as follows:
- 24 hours daily for the guest rooms (in-room minibars and in-room dining [room service])
 - 6:00 a.m. to 2:00 a.m. daily for all other areas designated in Condition No. 6
- b. No after-hours use is permitted, except routine clean-up. This includes but is not limited to private or promotional events, special events, excluding any activities which are issued film permits by the City.

8. Security.

- a. All exterior portions of the site shall be adequately illuminated in the evening so as to make discernible the faces and clothing of persons utilizing the space. Lighting shall be directed onto the site without being disruptive to persons on adjacent properties.
- b. A camera surveillance system shall be installed and operating at all times to monitor the interior, entrance, exits and exterior areas, in front of and around the premises. Recordings shall be maintained for a minimum period of 30 days and are intended for use by the Los Angeles Police Department.
- c. The applicant shall be responsible for monitoring both patron and employee conduct on the premises and within the parking areas under their control to assure behavior that does not adversely affect or detract from the quality of life for adjoining residents, property owners, and businesses.
- d. Loitering is prohibited on or around these premises or the area under the control of the applicant. "No Loitering or Public Drinking" signs shall be posted in and outside of the subject facility.
- e. At least one on-duty manager with authority over the activities within the facility shall be on the premises at all times that the facility is open for business. The on-duty manager's responsibilities shall include the monitoring of the premises to ensure compliance with all applicable State laws, Municipal Code requirements and the conditions imposed by the Department of Alcoholic Beverage Control (ABC) and the conditional use herein. Every effort shall be undertaken in managing the facility to discourage illegal and criminal activity on the subject premises and any exterior area over which the building owner exercises control, in effort to ensure that no activities associated with such problems as narcotics sales, use or possession, gambling, prostitution, loitering, theft, vandalism or truancy occur.

9. There shall be no Adult Entertainment of any type pursuant to LAMC Section 12.70.

10. No conditional use for dancing has been requested or approved herein. Dancing is prohibited.
11. There shall be no live entertainment or amplified music on the premises. There shall be no karaoke, disc jockey, or topless entertainment.
12. Coin operated game machines, pool tables or similar game activities or equipment shall not be permitted. Official California State lottery games and machines are allowed.
13. **Good Neighbor Program.** Prior to the utilization of this grant, a telephone number and email address shall be provided for complaints or concerns from the community regarding the operation of the hotel. The phone number and email address shall be posted at the hotel lobby.

Complaints shall be responded to within 24-hours. Each tenancy shall maintain a log of all calls and emails, detailing: (1) date complaint received; (2) nature of complaint, and (3) the manner in which the complaint was resolved.

14. **STAR/LEAD/RBS Training.** Within the first six months of operation, all employees involved with the sale of alcohol shall enroll in the Los Angeles Police Department "Standardized Training for Alcohol Retailers" (STAR) or Department of Alcoholic Beverage Control "Licensee Education on Alcohol and Drugs" (LEAD) training program or the Responsible Beverage Service (RBS) Training Program. Upon completion of such training, the applicant shall request the Police Department or Department of Alcohol Beverage Control to issue a letter identifying which employees completed the training. STAR or LEAD or RBS training shall be conducted for all new hires within three months of their employment.
15. The Applicant shall be responsible for maintaining free of litter the area adjacent to the premises over which they have control, including the sidewalk in front of the Project Site.
16. The approved conditions shall be retained on the premises at all times and produced immediately upon request of the Police Department, Department of Alcoholic Beverage Control, or the Department of Building and Safety. The on-site Manager and employees shall be knowledgeable of the conditions herein.
17. An electronic age verification device shall be purchased and retained on the premises to determine the age of any individual and shall be installed on at each point-of-sales location. This device shall be maintained in operational condition and all employees shall be instructed in its use.
18. Smoking tobacco or any non-tobacco substance, including from electronic smoking devices, is prohibited in or within ten feet of the outdoor dining areas in accordance with Los Angeles Municipal Code Section 41.50 B.2.c. This prohibition applies to all outdoor areas of the project site if the outdoor area is used in conjunction with food service and/or the consumption, dispensing, or sale of either alcoholic or non-alcoholic beverages.
19. The applicant(s) and all tenancies shall comply with 6404.5(b) of the Labor Code, which prohibits smoking within any place of employment. The applicant/any tenancy shall not possess ashtrays or other receptacles used for the purpose of collecting trash or cigarettes/cigar butts within the interior of the subject establishment.
20. **Designated Driver Program.** Prior to the utilization of this grant, the operator of the hotel, and each operator of each restaurant/bar/lounge establishment if applicable, shall establish

a “Designated Driver Program” which shall include, but not be limited to, signs/cards, notation on websites/social media, notifying patrons of the program, at each establishment location. The signs/cards/website/social media shall be visible to the customer and posted or printed in prominent locations or areas of each establishment. These may include signs/cards on each table, at the entrance, at the host station, in the waiting area, at the bars, or on the bathrooms, or a statement in the menus, a website, or on social media.

21. Any music, sound or noise which is under control of the applicant shall not constitute a violation of Sections 112.06 or 116.01 of the Los Angeles Municipal Code (Citywide Noise Ordinance) and shall not be audible beyond the subject premises. At any time during the term of the grant a City inspector may visit the site during operating hours to measure the noise levels using a calibrated decibel/sound level meter. If, upon inspection, it is found that the noise level exceeds those allowed by the Citywide Noise Ordinance, the owner/operator will be notified and will be required to modify or, eliminate the source of the noise or retain an acoustical engineer to recommend, design and implement noise control measures within property such as, noise barriers, sound absorbers or buffer zones.
22. **Private Events.** Any use of any tenancy for private events, including corporate events, birthday parties, anniversary parties, weddings or other private events which are not open to the general public, shall be subject to all the same provisions and hours of operation stated herein.
23. The Applicant shall not sublet any portion of the premises to outside “promoters” for nightclub activity.
24. **MViP – Monitoring Verification and Inspection Program.** Prior to the effectuation of this grant, fees required per LAMC Section 19.01 E.3 - Monitoring of Conditional Use Permits, Inspection, and Field Compliance for Review of Operations and Section 19.04 - Miscellaneous ZA Sign Offs shall be paid to the City.
 - a. Within 24 months from the beginning of operations or issuance of a Certificate of Occupancy, a City inspector will conduct a site visit to assess compliance with, or violations of, any of the conditions of this grant. Observations and results of said inspection will be documented and included in the administrative file.
 - b. The owner and operator shall be notified of the deficiency or violation and required to correct or eliminate the deficiency or violation. Multiple or continued documented violations or Orders to Comply issued by the Department of Building and Safety which are not addressed within the time prescribed, may result in additional corrective conditions imposed by the Zoning Administrator.
25. At any time during the period of validity of this grant (authorizing the sale of alcoholic beverages), if it is determined that the new operation is not in substantial conformance with the approved floor plan, or the operation has changed in mode or character from the original approval, or if documented evidence be submitted showing a continued violation(s) of any condition(s) of this grant resulting in a disruption or interference with the peaceful enjoyment of the adjoining and neighboring properties, the City Planning Commission or their designee reserves the right to require that the owner or operator file a Plan Approval application, in association with the appropriate fees, and a 500-foot notification radius. The purpose of the plan approval will be to review the operation of the premise and establish conditions applicable to the use as conducted by the new owner or operator, consistent with the intent of the Conditions of this grant. Upon this review, the City Planning Commission or their designee may modify, add, or delete conditions, and if warranted, reserves the right to conduct this public hearing for nuisance abatement/revocation purposes.

- 26. Vehicle Parking.** The Project shall be permitted a reduction of 20 percent in the required amount of vehicle parking. Prior to the issuance of a building permit, the Applicant shall update the plans stamped Exhibit A, dated July 10, 2025, with corrected vehicle parking requirements for all proposed uses, to the satisfaction of the Department of City Planning, Major Projects.

Site Plan Review Conditions

- 27. Site Development.** The use and development of the Project Site shall be in substantial conformance with the plans stamped Exhibit A, dated July 10, 2025. No change to the plans will be made without prior review by the Department of City Planning, Major Projects, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the Project conditions.
- 28. Landscaping.** Prior to the issuance of a building permit, a landscape and irrigation plan shall be submitted to the Department of City Planning for approval. The landscape plan shall be in substantial conformance with the landscape plan stamped Exhibit A, dated July 10, 2025. Minor deviations from the requirements provided below may be permitted by the Department of City Planning to permit the existing landscaping conditions provided that the plantings are well established and in good condition.
- 29. Parking Structures.**
- a. All above-grade levels of the Project's parking podium shall be consistent with the façade treatments in the plans stamped Exhibit A, dated July 10, 2025.
 - b. Entrances, elevators, and stairs for parking structures shall be easily accessible and highlighted architecturally.
- 30. Parking Covenant.** The Project shall maintain eight vehicle parking spaces for the exclusive use of the property located at 1721 South Flower Street, as required by Condition No. 7 of Case No. ZA-2003-9927-CUX-PA5-1A. Additionally, the Project Site shall maintain clear signage stating that patrons of 1721 South Flower Street may park in this location, as required by Condition No. 8c of Case No. ZA-2003-9927-CUX-PA5-1A.
- 31. Design.**
- a. Along the project's ground floor façade along Venice Boulevard, the project shall incorporate no less than a total of 200 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Along the project's ground floor façade along Hope Street, the project shall incorporate no less than a total of 75 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Along the project's ground floor façade along Flower Street, the project shall incorporate no less than a total of 25 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Transparent/glazed surfaces must be a minimum of four feet in height to count towards this requirement.
 - b. All building façades shall utilize a minimum of two different materials. Windows, doors, balcony railings, and decorative features (such as light fixtures, planters, etc.) are excluded from meeting this requirement.
 - c. The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or

films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

- d. Glass used in building façades shall be non-reflective or treated with a non-reflective coating in order to minimize glare from reflected sunlight.
- e. The Applicant shall incorporate additional roof articulation design features for the two proposed towers, to the satisfaction of the Department of City Planning, Major Projects.

32. Paseo. The Project shall provide a minimum 4,200 square-foot hardscaped and landscaped pedestrian paseo extending north-south through the middle of the Project Site, from Venice Boulevard to the alley, as shown in Exhibit A, July 10, 2025. The Paseo shall meet the following requirements:

- a. Remain publicly accessible 24 hours a day, and gates or other barriers blocking pedestrian access through the paseo shall be prohibited. No motorized vehicles shall be permitted, except for emergency vehicles used during an emergency.
- b. Incorporate one publicly accessible seat for every 200 square feet of area. Seating reserved for the use of restaurants or an outdoor dining establishment shall not count towards meeting this requirement.
- c. Provide supportive amenities conducive to first-last mile connections, multi-modal transportation, and mobility hubs, including bikeshare stations, Wi-Fi, and transit information.
- d. Provide signage indicating public use (i.e., containing the phrase “Open to the Public”) and also include contact information for maintenance or emergency.
- e. At least 40 percent of the Paseo area, excluding any outdoor dining areas associated with a restaurant tenant space, shall be landscaped with planting.
- f. The Paseo shall be lined with active ground floor uses (as outlined in the Downtown Design Guide) along a minimum of 50 percent of its frontage on both sides.
- g. The Paseo shall be maintained in good condition by the Project operator and/or owner for the life of the Project.

33. Pick-Up/Drop-Off Zones. Pick-up/drop-off curb cutouts on the street are prohibited along the Project’s street frontages. Pick-up/drop-off shall be conducted on-site or along the street curbs only.

34. Tree Wells. The minimum depth of tree wells and planters on the rooftop, any above-grade open space, and above a subterranean structure shall be as follows:

- a. Minimum depth for trees shall be 42 inches.
- b. Minimum depth for shrubs shall be 30 inches.
- c. Minimum depth for herbaceous plantings and ground cover shall be 18 inches.
- d. Minimum depth for an extensive green roof shall be three inches.

The minimum amount of soil volume for tree wells shall be based on the size of the tree at maturity as follows:

- a. 220 cubic feet for a tree 15 - 19 feet tall at maturity.
 - b. 400 cubic feet for a tree 20 - 24 feet tall at maturity.
 - c. 620 cubic feet for a medium tree or 25 - 29 feet tall at maturity.
 - d. 900 cubic feet for a large tree or 30 - 34 feet tall at maturity.
- 35. Tree Maintenance.** New trees planted within the public right-of-way shall be spaced not more than an average of 30 feet on center, unless otherwise permitted by the Urban Forestry Division, Bureau of Public Works.
- 36. Utilities.** All utilities shall be fully screened from view of any abutting properties and the public right-of-way.
- 37. Signage.** There shall be no off-site commercial signage on construction fencing during construction.
- 38. Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.
- a. Areas where nighttime uses are located shall be maintained to provide sufficient illumination of the immediate environment so as to render objects or persons clearly visible for the safety of the public and emergency response personnel.
 - b. All pedestrian walkways, storefront entrances, and vehicular accessways shall be illuminated with lighting fixtures.
 - c. Light fixtures located on the Project Site (and not in the public right-of-way) shall be harmonious with the building design. Wall mounted lighting fixtures to accent and complement architectural details at night shall be installed on the building to provide illumination to pedestrians and motorists.
- 39. Construction Generators.** The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. The Project construction contractor shall use on-site electrical sources and solar generators to power equipment rather than diesel generators, where feasible.
- 40. Mechanical Equipment.** All mechanical equipment shall be fully screened from view of any abutting properties and the public right-of-way.
- 41. Trash/Storage.** All trash collecting and storage areas shall be located on-site and not visible from the public right-of-way. Trash receptacles shall be enclosed and/or covered at all times. Trash/recycling containers shall be locked when not in use.
- 42. Graffiti Removal.** All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
- 43. Construction Traffic Management Plan.** The Applicant shall prepare a Construction Traffic Management Plan which will include a construction work site traffic control plan, DOT

recommends that the construction work site traffic control plan be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work.

44. **Project Access and Circulation.** The Applicant shall contact LADOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design. Driveway placement and design shall be approved by the Department of City Planning in consultation with LADOT.
45. **Worksite Traffic Control Requirements.** A construction work site traffic control plan shall be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <http://ladot.lacity.org/businesses/temporary-traffic-control-plans> to determine which section to coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.
46. **Transportation Demand Management (TDM) Program.** In addition to the TDM strategies cited in the Mitigation Measure of the MMP, the project shall prepare and submit a TDM program to DOT for review prior to the issuance of the first building permit for this project with a final TDM program to be approved by DOT prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:
 - Implement a Neighborhood Friendly Street improvement as identified in the Mobility Plan 2035, which may include curb extensions, wayfinding signage, diverters, bicycle loop detection, shared lane markings, etc.
 - Enhance the environment for bicyclists and pedestrians;
 - Vehicle trip reduction incentives and services for Project employees and/or tenants;
 - Onsite education and/or information on alternative transportation modes;
 - Flexible/alternative work schedules and telecommuting programs;
 - Incentives for using alternative travel modes such as discounted monthly transit passes, carpool and vanpool preferential load/unload areas or designated parking spaces, a "parking cash-out" subsidy, and/or unbundled parking;
 - Convenient and secure bicycle storage within a bicycle locker, an attended cage, or a secure parking room;
 - Bicycle parking beyond the requirement of the Bicycle Parking Ordinance No. 185,480;
 - On-site lockers for employees who bicycle or use another active means of getting to work;
 - Implementation of first and last mile solutions that can increase the use of transit by bridging the gap between transit stops/stations and a commuter's origin or final destination;
 - Unbundled parking from the commercial leasing cost and from the housing cost;

- A one-time fixed-fee contribution of \$50,000 prior to the issuance of the first certificate of occupancy for the project to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the proposed project area;
- Participate and membership of a Transportation Management Organization (TMO) serving the area where the Project is located;
- Record a Covenant and Agreement to ensure that the TDM program will be maintained.

- 47. LADOT Physical Improvements.** The project proposes to restripe the westbound approach of 17th Street within the existing roadway width to accommodate one shared through/left-turn lane and two through lanes on 17th Street as illustrated in Attachment 4. This would require the removal of approximately two unmetered parking spaces on 17th Street.

The applicant shall be responsible for the cost and implementation of any necessary traffic signal equipment modifications, bus stop relocations and lost parking meter revenues associated with the proposed transportation improvement described above. All proposed street improvement and associated traffic signal work within the City of Los Angeles must be guaranteed through BOE's B-Permit process, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 972-8687, to arrange a pre-design meeting to finalize the proposed design. Costs related to any relocation of bus zones and shelters, to modifying or upgrading traffic signal equipment, and that are necessary in order to implement the proposed mitigations shall be incurred by the applicant.

If a proposed traffic mitigation measure does not receive the required approval during plan review, a substitute mitigation measure may be provided subject to the approval of LADOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is environmentally equivalent or superior to the original measure in mitigating the project's significant traffic impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant traffic impact would remain.

- 48. Development Review Fees.** LAMC Section 19.15 identifies specific fees for traffic study review, condition clearance, and permit issuance. The Applicant shall comply with any applicable fees per this ordinance.
- 49. Street Trees and Pedestrian Lighting.** Street trees and pedestrian lighting in the public right-of-way shall be selected and designed to be consistent with existing trees and lighting in the area as approved the Department Public Works – Urban Forestry Division and the Department of Cultural Affairs.
- 50. Maintenance.** The subject property, including any trash storage areas, associated parking facilities, sidewalks, driveways, yard areas, parkways, and exterior walls along the property lines, shall be maintained in an attractive condition and shall be kept free of trash and debris.

Director's Determination Conditions

- 51. Open Space.** The Project shall be permitted a maximum 10 percent reduction in the total required usable open space, provided that any reduction is to the common open space portion only.

Environmental Conditions

- 52. Implementation.** The Mitigation Monitoring Program (MMP), attached as “Exhibit C” and part of the case file, shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Project Design Features (PDF) and Mitigation Measure (MM) and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

- 53. Construction Monitor.** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

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

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

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

- 55. Inadvertent Discovery of Tribal Cultural Resources.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground

Disturbance Activities (demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the project site), the potential tribal cultural resources shall be properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find, i.e. within a radius of 60 feet, and contact the following: (1) all California Native American tribes that are recognized by the California Native American Heritage Commission as affiliated with the area of the Project Site; (2) and the Department of City Planning.
- The applicant shall retain a qualified archaeological monitor, identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified.
- If the archaeological monitor determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the Applicant shall consult with the archaeological monitor and with any tribes that respond on the recommended disposition and treatment of any Tribal Cultural Resource encountered during all Ground Disturbing Activities.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the tribe that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities in the vicinity of the find (i.e. within a radius of 60 feet) until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by the tribe, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by the tribe and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

56. Inadvertent Discovery of Human Remains. In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

57. Inadvertent Discovery of Archaeological Resources. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. The applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified archaeologist and approved by the Department of City Planning must be followed unless avoidance is determined to be unnecessary or infeasible by the qualified archaeologist. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

58. Inadvertent Discovery of Paleontological Resources. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified paleontologist and approved by the Department of City Planning must be followed unless avoidance is determined to be unnecessary or infeasible.

by the qualified paleontologist. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

- 59. Prohibition on Pile Drivers.** The use of pile drivers during Project construction is prohibited.

Administrative Conditions of Approval

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

of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

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

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

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

For purposes of this condition, the following definitions apply:

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

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

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

FINDINGS

(As Amended by the City Planning Commission at its meeting on July 10, 2025)

ENTITLEMENT FINDINGS

Supplemental Use District – Sign District Findings

The South Park Towers Project (Project) proposes the construction of a new, mixed-use residential and commercial development consisting of two high-rise towers. An outdoor paseo would bisect the Project Site, running north-south between the two towers. The South Park Towers Project Sign District (Sign District) consists of four Supergraphic signs and/or Digital Displays, with a total of approximately 1,368 square feet of sign area, located along the tower facades facing the paseo and on angled projecting walls at the corners of the two towers anchoring the paseo from each side. Following are the findings for the establishment of a Supplemental Use District, as required by Los Angeles Municipal Code (LAMC) Section 12.32.

1. The action substantially conforms with the purposes, intent and provisions of the General Plan.

The Sign District is in substantial conformance with the purposes, intent, and provisions of the General Plan, including the relevant provisions of the Framework Element and Land Use Element, as explained below:

Framework Element

The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element designates the Project area as a "Downtown Center," identified as an international center for finance and trade that serves the population of the five-county metropolitan region. Downtown Los Angeles is the largest government center in the region and the location of major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, and regional transportation facilities. The Downtown Center is generally characterized by a Floor Area Ratio (FAR) of up to 13:1 and high-rise buildings.

The Project is consistent with the objectives and policies of the Framework Element as described below:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

Goal 3C: *A Downtown Center as the primary economic, governmental, and social focal point of the region with an enhanced residential community.*

Objective 3.11: *Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.*

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

Objective 5.9: *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*

The Sign District would enhance and contribute to the form and function of the Downtown Center by concentrating signage along major arterial roadways and activity corridors, such as Venice Boulevard and the publicly accessible paseo bisecting the Project Site. The Sign District would create a sense of place and a lively pedestrian environment by adding vibrant signage, reinforcing the development as a Downtown destination, and contributing to Downtown as a thriving commercial, residential and visitor-serving area as well as the ongoing revitalization of Downtown. The Sign District would also maximize visibility of the Project's location near the core of the City's hospitality and entertainment hub and would highlight the vibrance and vitality of the area as the location of major cultural, entertainment, and hotel facilities. The proposed mix of uses would further support the development of the Project Site and surrounding area as a dense urban core with a variety of housing, commercial, and entertainment-supporting uses.

The Sign District would provide a comprehensive set of signage regulations for the Project Site, primarily focused on creating a unique and recognizable identity through signage elements to enhance and contribute to this part of the Downtown area, draw visitors to the neighborhood, and benefit the local economy, while fostering a vibrant environment with a unified aesthetic. The Sign District would be strategically located to be compatible with and substantially in line with other sign districts and signage near the Project Site, by proposing similar signage types, including Off-Site Signs, Digital Displays, and Supergraphic Signs; and comparable hours of operation and refresh rates, creating level opportunities for commercial identification and advertising as with other sites located within the Downtown Center area.

The Sign District would ensure the signs are architecturally integrated onto the buildings. All of the proposed signs would be mounted on distinct structures protruding and angled from the buildings in the same manner, providing a consistent and coherent design. Illumination from the proposed signage would provide additional ambient lighting along the Project Site frontages and promote safety.

As discussed above, the signage would support the Project Site as a regional destination, spurring additional economic activity and supporting the existing Downtown community which continues to see investment and development; and any off-site advertising, as discussed above, would contribute to the economic vitality of the City as well as the community. As such, the Sign District would support the Downtown Center, in line with the objectives of the Framework Element.

Land Use Element (Downtown Community Plan)

The Project Site is located within the Downtown Community Plan, one of 34 Community Plans which together form the Land Use Element of the General Plan. The Downtown Community Plan designates the Project Site for Transit Core land uses. Transit Core areas

are envisioned as “dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form is High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock. The residential density of the Transit Core is limited by floor area. In the Downtown Plan this land use designation has a max FAR range of 10.0-13.0.” Specifically, the Sign District supports the following goal and policies of the Downtown Community Plan.

Goal LU 11: *An urban form that connects people and places and creates a walkable environment.*

Policy LU 11.12: *Ensure that signs contribute positively to the urban fabric, complement neighborhood character, and are oriented towards pedestrians.*

Policy LU 11.13: *Consideration of new sign districts should be limited to entertainment focused areas with regional draws.*

As with the Framework Element, the Downtown Community Plan envisions a dense urban core developed with a variety of residential, commercial, entertainment, and supporting uses in this location. The Project furthers these goals by providing a mix of residential, commercial service, and hospitality uses, all of which would be complemented by the Sign District that enhances the Project’s location near the core of the City’s commercial, entertainment, and hospitality hub. The area serves as a major regional draw and the Sign District would enhance that urban fabric. Therefore, the Sign District substantially conforms with the goals and policies of the Downtown Community Plan.

2. The proposed ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.

The proposed Sign District is a single property encompassing approximately 1.6 acres in a Commercial Zone and thus meets the technical requirements for the establishment of a Sign District as defined in LAMC Section 13.11. The Sign District proposes a comprehensive sign program for the Project, primarily focused on enhancing the form and function of the surrounding area as a major urban entertainment and hospitality hub in the region, and reduce lingering blight.

The Sign District conforms to the public necessity, convenience, and general welfare of the City and reflects good zoning practice. The Project Site is located in the southern part of Downtown Los Angeles, a heavily urbanized neighborhood developed with a variety of dense urban uses. The Project Site is located one block east of the Los Angeles Convention Center and in proximity to the many entertainment and hospitality uses along Figueroa Street, such as LA Live and Crypto.com Arena, and is in close proximity to multiple transit lines and stations including the Metro A and E light-rail lines.

The Supergraphic Signs and Digital Displays would be primarily located along the tower facades facing the internal paseo and architecturally integrated into building cut-outs and on angled projecting walls at the corners of the two towers anchoring the paseo from each side. In particular, the Sign District would enhance the identity of the surrounding neighborhood by providing signs that would be architecturally integrated into the design of the building, functioning to enhance the unique character of the Project Site, and to complement the land use and urban design objectives articulated in the Downtown Community Plan. The Sign District proposes tailored signage regulations that will support economic development goals by creating an engaging visual environment in line with the

form and function of the surrounding area, while promoting general welfare by minimizing any potential impacts associated with lighting and clutter. The proposed Sign District fosters a unified aesthetic and sense of identity that complements the surrounding area while ensuring intentional placement of signage with consideration for surrounding uses. The Sign District would be strategically located to be compatible with and substantially in line with other sign districts within approximately one mile of the Project Site, including the Convention Center and Arena Sign District (Ordinance No. 188,078), the Figueroa and Pico Sign District (Ordinance No. 185,666), the Figueroa and Olympic Sign District (Ordinance No. 182,200), the Figueroa and Seventh Street Sign District (Ordinance No. 181,637), and the Historic Broadway Sign Supplemental Use District (Ordinance No. 184,056), as well as signage permitted within the Los Angeles Sports and Entertainment District (LASED)t Specific Plan, reflecting good past and present zoning practices.

In addition, the Sign District establishes criteria for signage design, standards, locations, illumination levels, and the types of permitted and prohibited signs. Appropriate and balanced sign regulations are essential to maintaining compatibility with surrounding development while fostering a vibrant urban environment. The Sign District would prohibit signs such as inflatable devices, pole signs, and any signs not specifically authorized by the Sign District or that do not comply with applicable state and federal law. Most sign types would be subject to the Chapter 1A sign standards of the LAMC. For the signs regulated by the Sign District, the Sign District prescribes assurances as to design, standards, and location for architectural integration; illumination and refresh rates to ensure minimization of light trespass on sensitive receptors; and has been reviewed by the Department of Transportation (LADOT) for hazard evaluation and determination per LAMC Section 4C.11.1.C.5, and will not pose a safety hazard.

The Sign District also includes a Sign Reduction Program aimed at reducing visual blight by requiring the removal of existing, legally permitted off-site signs (including nonconforming off-site signs) within the boundaries of Council District 14 or the Downtown Community Plan area, at a 2:1 ratio for every square foot of new Digital Displays with off-site advertising and a 1:1 ratio for every square foot of new Supergraphics with off-site advertising. As such, the Sign District would support zoning policies to enhance the physical appearance of the community. As such, the Sign District supports public necessity, convenience, general welfare, and good zoning practice.

Transfer of Floor Area Rights Findings

Following are the findings for a Transfer of Floor Area (TFAR) for Projects involving a Transfer on a Receiver Site within the Central City TFAR Area which is not located within the City Center Redevelopment Project Area¹, as required by LAMC Section 14.5.6 A.2.

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

¹ The Downtown Community Plan has dissolved the City Center Redevelopment Plan, and therefore while the Project was previously within the Redevelopment Plan area, the Project is no longer subject to the provisions of the City Center Redevelopment Plan, and therefore for the purposes of the Findings, is subject to the Findings for projects not located within a Redevelopment Plan.

The Project proposes the construction of a new, mixed-use residential and commercial development consisting of two high-rise towers. Tower 1 (Hotel Tower) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space, and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space. The Project would result in a total of 452,630 square feet of floor area.

The Project Site is located in the southern part of Downtown Los Angeles, bounded by Venice Boulevard to the north, Hope Street to the east, the Interstate 10 freeway to the south, and Flower Street to the west. Surrounding development includes low-rise commercial and warehouse buildings and four- and six-story affordable housing buildings directly abutting the Project Site, and larger mid- and high-rise residential and hotel buildings farther to the north and west.

The Project Site is well-served by existing infrastructure, as the area is currently developed with a mix of high density uses in the surrounding area, as well as by public transit, including both rail and bus service. Metro operates Lines 33 and 81, with stops at the intersection of Venice Boulevard and Flower Street, and Venice Boulevard and Hope Street (both intersections which abut the Project Site). Commuter Express operates express lines to destinations throughout the greater Los Angeles area with a stop at the intersection of Venice Boulevard and Flower Street. Downtown Area Short Hop (DASH) Route F, which runs between the Bunker Hill neighborhood and the University of Southern California, stops at the intersection of Venice Boulevard and Figueroa Street, one block west of the Project Site. The Metro A and E light-rail line tracks also directly abut the Project Site to the west, running at-grade along Flower Street, although the Project Site is located halfway between two stops, with the Pico Station located approximately 1,300 feet north of the Project Site, and the Grand / LATTC Station located approximately 1,000 feet south of the Project Site. In addition to available public transit, regional access to the Site is also provided by the Interstate 10 and 110 freeways, which intersect approximately 1,500 feet west of the Project Site. Venice Boulevard, abutting the Project Site to the north, is a major east-west arterial roadway in the area, while Figueroa Street, a major north-south arterial roadway in the area, is located one block west of the Project Site.

The Applicant has requested a transfer of 226,121 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to permit a maximum of 452,630 square feet of floor area on the Project Site (Receiver Site). The Transfer is appropriate for the long-term development of the Central City because it will result in the development of a high-rise residential and hotel project that would be similar in form to other developments in this part of the City and would further contribute to the function of Downtown as a densely-developed, high-rise urban core. The Project is located in close proximity to many similar and compatible high-rise residential, hotel, and commercial developments, such as those near the Los Angeles Convention Center and along Figueroa Street. The Project would contribute to the Downtown economy by creating jobs, increase City tax revenue generation, support the continued evolution of Downtown into a "24-hour community" by adding residential units, and serving as a link and catalyst for other development in the area. As such, the Project is centrally located and near transit, would be compatible with its densely developed surroundings and the City's supporting utility infrastructure, and would be in close proximity to jobs, housing, and a wide range of uses and public services. Therefore, the proposed Transfer will be appropriate for the Receiver Site.

4. The Transfer serves the public interest.

As part of the Transfer Plan, a Public Benefit Payment is required and must serve a public purpose, such as: providing for affordable housing; public open space; historic preservation; recreational; cultural; community and public facilities; job training and outreach programs; affordable child care; streetscape improvements; public arts programs; homeless services programs; or public transportation improvements. The Transfer serves the public interest by facilitating a project that will contribute to the sustained economic vitality of the Downtown area, and by contributing a total Public Benefit Payment of \$2,275,495 (based on a formula that includes the Transfer of 226,121 square feet) and a TFAR Transfer Payment of \$1,130,605 (based on the Transfer of 226,121 square feet multiplied by \$5 per square foot transferred), in accordance with LAMC Section 14.5.10, as depicted in the table below. The Public Benefit Payment consists of a 50 percent payment of \$1,137,748 to the Public Benefit Payment Trust Fund, and a 50 percent payment of \$1,137,747 for public benefits to be directly provided by the Applicant to the CD 14 Affordable Housing Trust Fund. As such, the Transfer of Floor Area serves the public benefit interest as it complies with the specific requirement for the transfer to occur.

SOUTH PARK TOWERS PROJECT PUBLIC BENEFIT PAYMENT TRANSFER PLAN		
TFAR TRANSFER PAYMENT		
Total Payment:	\$1,130,605	Public Benefits Trust Fund
PUBLIC BENEFIT PAYMENT		
Public Benefit Payment (Cash):	\$1,137,748	Public Benefits Trust Fund
Public Benefit Payment (Direct Provision):	\$1,137,747	CD 14 Affordable Housing Trust Fund
Total Payment:	\$2,275,495	

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

The Downtown Community Plan presently designates the Project Site for Transit Core land uses. The Project Site is vested in the C2-2D-O Zone (Commercial Zone, Height District 2 with “D” Development Limitations, Oil Drilling District)². The “D” Development Limitations established under Ordinance No. 164,307 (effective January 30, 1989) limit FAR on the Project Site to 3:1, subject to permissible increases through the TFAR process. The requested Transfer will reallocate 226,121 square feet of floor area from the Los Angeles Convention Center to the Project Site.

The Transfer is consistent with the Downtown Community Plan, which envisions high-rise developments with unlimited height and density and maximum FAR range of 10:1-13:1 on sites with the Transit Core land use designation. The Project further supports the following goals and policies of the Downtown Community Plan:

² The Project was deemed complete on July 10, 2018 and is vested under the zoning regulations in effect at that time. Therefore, the new [HB3-G1-5][CX3-FA][CPIO-O] zoning designation, including the Downtown Community Plan Implementation Overlay (CPIO), does not apply.

Goal LU 1: A sustainable, innovative, and diversified downtown for all that offers a full range of opportunities and experiences.

Policy LU 1.1: Ensure the development of complete neighborhoods with diverse uses and resilient infrastructure, parks, streetscapes, transit, and community amenities.

Goal LU 2: Housing production and preservation through public and private action that results in a housing supply to meet projected growth in a manner that is safe, livable, and affordable to a full range of income levels; reinforces the character of neighborhoods; and add to the vitality of downtown.

Goal LU 4: A diversity of housing options that supports the co-location of housing with a range of uses.

Policy LU 4.1: Balance housing and employment uses to encourage vibrancy and reinforce Downtown as a community, as well as a destination.

Policy LU 4.3: Promote shared on-site amenities, including usable open space in new development projects.

Goal LU 6: A broad-based economy that leverages downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.

Policy LU 6.1: Promote Downtown as the primary regional center for employment by dedicating and prioritizing space for jobs across a variety of enterprises.

Policy LU 6.3: Make Downtown economically competitive through improvements to the public realm.

Policy LU 6.4: Support efforts to expand Convention Center business and position the City to host world class events like the Olympic Games.

Goal LU 19: Dense centers of employment, housing, and entertainment uses with the highest intensity of development, well-served by a convergence of multiple transit lines.

Policy LU 19.2: Ensure a vibrant mixture of land uses, including office, hotel, retail, residential, cultural, and entertainment, that together reinforce Downtown as the primary center of urban activity in the Southern California region.

Policy LU 19.3: Encourage the redevelopment of underutilized buildings and properties to accommodate demand for housing and jobs that contribute to a vibrant Downtown.

Goal LU 20: The primary economic, social, and cultural focal point of Los Angeles that serves the region, state, nation, and world. A center for innovation and a desirable place for businesses and institutions to locate.

Policy LU 20.2: Prioritize space for employment, retail, and entertainment uses, supported by an enhanced public realm, to attract and sustain workers.

Policy LU 20.6: Facilitate the development of hospitality serving uses, such as hotels, near cultural, entertainment, and institutional centers with a regional draw, and in close proximity to transit.

The Project Site is located in the southern part of Downtown Los Angeles, a heavily urbanized neighborhood developed with some of the highest intensities of employment, housing, and entertainment uses in the City. The Project Site is located one block east of the Los Angeles Convention Center and many entertainment and hospitality uses along Figueroa Street, and is in close proximity to multiple transit lines and stations including the Metro A and E light-rail lines. Within less than one mile of the Project Site are major destinations such as the Los Angeles Convention Center, the Crypto.com Arena, the Peacock Theater, and LA LIVE, as well as several newer, high-rise residential and commercial developments. As such, the Project Site is well-positioned for high-density development that would maximize the form and function of the surrounding area as a major activity center, employment hub, and entertainment destination in the region.

The Project Site is currently developed with low-rise commercial buildings and surface parking, which the Project would demolish for the construction of a new mixed-use residential and commercial development consisting of two high-rise towers, including a 22-story Hotel Tower with 300 guest rooms and 3,120 square feet of ground floor commercial space, and a 23-story Residential Tower with 250 dwelling units and 10,000 square feet of ground floor commercial space that would complement the existing concentration of high-rise high-intensity residential and commercial developments in Downtown Los Angeles. In addition, the Project would collocate residential units, hotel guest rooms, and commercial services, thereby providing housing, jobs, and services on the same site. These uses would complement similar uses in the surrounding area, provide a range of uses for the community, and create a balance between housing and employment uses.

The Project would also add housing with a variety of housing unit typologies, including studio, one-bedroom, two-bedroom, and three-bedroom units to a site where there currently is none, thereby serving a diverse range of the community and supporting the transformation of Downtown Los Angeles into a “24-hour” neighborhood. The Project would also provide space for services and amenities for residents and visitors alike, most notably a paseo that would connect the two towers and serve as a functional and inviting shared amenity. The paseo would include landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking, enhancing connectivity between the buildings and contributing to the overall design of the Project and urban form of the community. As such, the Project would support the housing production goals of the Downtown Community Plan by providing a diverse range of residential unit typologies, while also creating employment and service uses to support the development of a holistic community.

The Project would also support the role of Downtown Los Angeles as the primary regional center in the City by adding 300 hotel guest rooms in support of the many nearby economic and entertainment draws. The hotel would further support the City’s efforts to attract conventions, increased business, and to host the Olympics in 2028 by providing more guest rooms to accommodate such functions.

In addition, the Project would implement improvements to the adjacent public rights-of-way, including the installation of new sidewalks, street lighting, and street trees, which would create a safer, more attractive, and engaging pedestrian environment and enrich the quality of the public realm. Such improvements would enhance walkability and access to nearby destinations and transit and contribute to a vibrant, high-density urban environment. As such, the Project would advance goals of making Downtown Los Angeles economically competitive by creating job-generating uses that support the function of Downtown as a tourist, business, and entertainment hub, and by contributing to public realm improvements that support a thriving and accessible urban environment.

Goal LU 10: *Development patterns that create a connected and seamless experience while reinforcing the identity of Downtown's special places.*

Policy LU 10.1: *Strategically concentrate the highest densities and intensities within the Plan area to respond to historic development patterns and match infrastructure investment.*

Policy LU 10.2: *Reinforce the distinct qualities of each neighborhood, and ensure that growth complements and is compatible with existing character and historic resources; and supports community needs.*

Policy LU 10.4: *Support infill development that responds and contributes to neighborhood character.*

The Transit Core land use designation envisions some of the highest development intensities in the City, with unlimited height and density and maximum FARs of 10:1 to 13:1. The Project would redevelop existing low-rise commercial buildings and surface parking with a new, mixed-use residential and commercial development consisting of two high-rise towers. The Project would both be compatible with various other high-rise developments in the area and support goals of further developing this neighborhood's character as a tall and dense urban core.

Goal LU 11: *An urban form that connects people and places and creates a walkable environment.*

Policy LU 11.1: *Require active ground floors and street frontages that improve walkability and connectivity, especially between transit stations and nearby destinations.*

Policy LU 11.2: *Encourage development that is well integrated with the public realm to create an inviting urban environment.*

Policy LU 11.3: *Incentivize the inclusion of paseos through large sites to improve pedestrian access.*

Policy LU 11.4: *Encourage building design that connects and orients people toward destinations and activity centers.*

Goal LU 22: *Distinctly urban neighborhoods that have the highest levels of pedestrian activity, well-designed buildings that meet the sky to create an interesting skyline, and ground floors that meet the street to contribute to a vibrant public realm.*

Policy LU 22.1: *Encourage well-designed, intensive development that contributes to a safe and inviting pedestrian realm and includes substantial benefits that reinforce Downtown's character and enhance livability.*

Policy LU 22.2: *Foster and reinforce a cohesive, pedestrian-friendly, and inviting streetscapes that promote walking, bicycling, and transit use. Encourage the creative infill of landscaped setbacks and inoperative spaces, such as those resulting from inconsistent streetwalls.*

Policy LU 22.5: *Promote the activation of ground floors of buildings and public plazas with enlivening uses such as kiosks and shops to create a lively urban environment and seamless interaction between private open space and sidewalks.*

Policy LU 22.6: Encourage new developments to contribute to the pedestrian and open space network with publicly accessible plazas and paseos. Design these spaces with appropriate shade and landscaping.

Policy LU 22.11: Seek opportunities to adapt alleys into sustainable, safe, inviting, and vibrant spaces that function as publicly accessible open space and pedestrian paths of travel, while accommodating necessary vehicular and loading functions.

The Project Site is currently developed with low-rise commercial buildings, surface parking, and a private alleyway, all with minimal street-level activation and which serve to create a stark pedestrian environment. The Project would significantly improve the physical environment and pedestrian experience on the Project Site and in the immediate vicinity by providing wider sidewalks, landscaping, and commercial storefronts along Venice Boulevard as the primary street frontage, thereby activating the streetscape, creating a lively urban environment, and facilitating movement to and along the Project Site. In addition, a publicly accessible paseo would replace the existing private alley in approximately the same place, turning a vehicle driveway into a pedestrian pathway featuring landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking. With commercial storefronts and a comprehensive signage program (as previously discussed in Finding Nos. 1 and 2) oriented along the paseo and framing the corners of the two towers at the intersection of Venice Boulevard, the Project would draw pedestrians in to the Project Site and enhance movement in the area.

The Project would also support access for all modes of travel, including by vehicle, pedestrian, and bicycle by purposefully locating short-term bicycle parking throughout the Project Site along the primary street frontages, the paseo, and in front of the ground floor commercial spaces, to increase convenience and useability. Therefore, the Project fosters a cohesive environment and streetscape that is conducive and attractive to all modes of transit.

Goal PO 1: A well maintained, accessible, and highly utilized open space system and public realm network that serves the growing population of Downtown residents, workers, and visitors.

Policy PO 1.3: Support the creation of different open space typologies, such as parklets, dog parks, and other facilities, to serve a variety of users and needs.

Goal LU 18: Legible and comfortable spaces to engage in physical activity, experience nature, and find respite.

Policy LU 18.1: Promote a pedestrian environment that enhances thermal and visual comfort and provides opportunities for resting and socializing.

Policy LU 18.4: Provide space for recreational facilities for the health and enjoyment of Downtown workers, residents, and visitors.

The paseo would provide over 4,200 square feet of publicly accessible open space and would provide landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking, which would provide a variety of amenities and serve a range of users. In addition, the Project would provide usable open space and amenity areas for residents and hotel guests, including indoor lounge and fitness rooms and outdoor terraces and pool decks, across both towers which would recreation amenities for workers, residents, and visitors alike. While the paseo would be privately maintained, as conditioned, it shall remain

publicly accessible at all times. As such, the Project would support goals to provide and maintain open space in the Downtown area.

Downtown Design Guide

In addition, as part of the TFAR entitlement, the Project is subject to the Downtown Design Guide, which was adopted by the City Planning Commission on June 8, 2017. The Downtown Design Guide supplements the City's General Plan and helps shape well-designed projects by setting forth standards and guidelines for sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing and street wall, on-site open space, architectural detail, streetscape improvement, and signage prepared at a finer grain specifically for the Downtown neighborhood districts; and encourages Downtown Los Angeles to develop as a more sustainable community with an emphasis on walkability and the making of great streets, districts and neighborhoods. The Downtown Design Guide also focuses on the relationship of the buildings to the street, including sidewalk treatment, the character of the building as it adjoins the sidewalk and connections to transit.

The Project meets several of the Design Guide standards and guidelines by providing visual articulation and variation to enrich the pedestrian experience and contribute to the quality of the streetscape that help define the pedestrian environment at the street level. The Project would activate street frontages, especially Venice Boulevard as the primary frontage, with ground floor commercial storefronts with extensive glazing to activate the streetscape. The Project would also improve the public right-of-way by widening the sidewalk and creating a publicly accessible paseo with enhanced paving and decorative features, creating an inviting experience for all pedestrians and drawing pedestrians into the Project Site. The paseo would further serve to reduce massing and building length on the Project Site.

Additionally, the Project would be appropriately scaled and consistent with similar developments in the vicinity. While the Project Site is generally surrounded by low- and mid-rise buildings, this part of Downtown continues to experience rapid growth with the introduction of taller buildings with a variety of residential, commercial service, and hotel uses being introduced within an area previously concentrated with low-scale commercial uses. With a maximum height of 23 stories and 260 feet, the Project would be similar in scale to, or shorter than, other high-rise developments nearby, including the 37-story Moxy and AC Hotel tower and the 43-story Hope + Flower apartment towers, one block north of the Project Site. Furthermore, the Hotel and Residential Towers have been designed to ensure adequate spacing between each tower and between the Project Site and adjacent properties. Specifically, the two towers are oriented to be offset and designed such that both towers have outdoor podium decks on Level 5; above Level 5, the Hotel Tower rises above the western portion of its podium and leaves the eastern portion open to the sky, while the Residential Tower rises above the southern portion of its podium and leaves the northern portion open to the sky, resulting in an effective separation of over 90 feet between the two towers. As such, the Project creates both internal setbacks between the two towers as well as external setbacks above the ground floor, which serve to improve the Project's useability and compatibility with surrounding properties.

Section 4.C of the Downtown Design Guide requires that at least 75 percent of all street frontages (not designated as Retail Streets) be lined with active uses or residential units with street-facing entrances. The intent of this design requirement is to activate primary corridors with glazing and transparency associated with active uses to enhance the streetscape and pedestrian environment. Although the Project does not meet this requirement along Flower Street and Hope Street, immediately abutting the Project Site, Flower Street is lined with light-rail tracks, while Hope Street terminates against the

Interstate 10 freeway; as a result, neither frontage serves to facilitate pedestrian movement throughout the broader neighborhood, nor are they conducive to active or residential uses at the street level. However, the Project does meet this requirement along the proposed paseo, which is lined with commercial storefronts and the primary hotel and residential lobbies. The paseo functions as a primary activity corridor for the Project, while Hope Street and Flower Street serve “back-of-house” functions; nevertheless, both Hope Street and Flower Street would still feature building entrances and an amount of activation with commercial storefronts at the intersections with Venice Boulevard (and have been conditioned as such). As such the Project substantially meets the intent of this design requirement to activate the ground level of the Project Site.

The Project, as proposed, substantially complies with all other applicable standards in the Downtown Design Guide. Therefore, based on the above, the Project substantially supports the relevant goals of the Downtown Community Plan, as well as the Downtown Design Guidelines, and is consistent with the Community Plan and other applicable policy plans.

Conditional Use (On-Site Alcohol Sales and Reduced Parking) Findings

Following are the findings for a Conditional Use Permit to permit the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel, and to allow a 20 percent reduction in the required amount of vehicle parking, as required by LAMC Sections 12.24 E, 12.24 W.1, and 12.24 S.

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

The Project proposes the construction of a new mixed-use residential and commercial development which includes a 22-story hotel building with 300 hotel guest rooms. The Applicant requests a Conditional Use Permit for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel to allow for alcoholic beverage service within the hotel guest rooms in the form of in-room minibars and in-room dining (room service), a bar and lounge by the lobby, a dining room and associated outdoor dining area on the ground floor, meeting rooms, outdoor terrace areas and pool deck on Level 5, and an outdoor terrace on Level 9.

The sale and dispensing of alcoholic beverages in conjunction with the proposed hotel would provide a service that is beneficial to the community by adding to the number of available dining venues and entertainment establishments offering food and alcohol in conjunction with the proposed use. The request would support the development of the proposed hotel and Project as a whole, which will improve the site with a new and modern development with enhanced landscaping, physical improvements, and activity-generating uses compared to the existing improvements on the site. Patrons would be drawn to the area due to the lodging, entertainment, and dining options available, and offering a full range of alcoholic beverages within the hotel portion of the Project would enhance the experience for visitors, employees, and residents nearby. The Project would also increase the economic vitality of the area by developing a new hotel use, maximizing its location within a Transit Priority Area and in proximity to the Los Angeles Convention Center and the Los Angeles Sports and Entertainment District (LASED), thereby supporting the form and function of the surrounding area as a major activity center, employment hub, and entertainment destination in the region. The ability to offer a full line of alcoholic beverages would also allow the hotel to remain competitive with similar uses in the area, as alcohol service is commonly expected by patrons as a part of such uses.

In addition, the request for reduced vehicle parking is appropriate in this location because the Project Site is located in a heavily urbanized commercial core in close proximity to a variety of transit options, including multiple bus lines and light-rail stations within one-quarter mile of the Project Site. In such a location, the request would enable the provision of services and amenities in a dense high-rise development without overburdening the Project to provide more vehicle parking than is necessary.

Thus, the sale and dispensing of a full line of alcoholic beverages, and request for a 20 percent parking reduction, in this location will both provide a valuable community service and enhance the physical environment.

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

The Project Site is currently developed with four low-rise commercial and warehouse buildings and associated surface parking and alley areas. The Project proposes the demolition of all existing improvements for the construction of a new mixed-use residential and commercial development consisting of two high-rise towers. Tower 1 (Hotel Tower) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space on the ground floor; and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space on the ground floor. The Project would result in a total of 452,630 square feet of floor area, and a maximum height of 260 feet (for the 23-story Residential Tower).

The Applicant requests a Conditional Use Permit for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel. Alcoholic beverage service is proposed within the hotel guest rooms in the form of in-room minibars and in-room dining (room service), a bar and lounge by the lobby, a dining room and associated outdoor dining area on the ground floor, meeting rooms, outdoor terrace areas and pool deck on Level 5, and an outdoor terrace on Level 9. Proposed hours of alcoholic beverage service are 24 hours daily for the hotel guest rooms and from 6:00 a.m. to 2:00 a.m. daily for all other uses including the bar, lounge, dining areas, meeting rooms, and terraces.

The Project Site is located in the southern part of Downtown Los Angeles, bordered by Venice Boulevard to the north, Hope Street to the east, the Interstate 10 freeway to the south, and Flower Street to the west. Immediately to the west and north of the Project Site, major commercial, hotel, and entertainment uses are part of the existing Los Angeles Convention Center and LASED. The Project would introduce a new hotel with a request for a full line of alcoholic beverages and a residential tower (not part of the alcohol request), thereby supporting the form and function of the surrounding area. While the Project Site is generally surrounded by low- and mid-rise buildings, this part of Downtown continues to experience rapid growth with the introduction of taller buildings with a variety of residential, commercial service, and hotel uses being introduced within an area previously concentrated with low-scale commercial uses. With a maximum height of 23 stories and 260 feet, the Project would be similar in scale to or shorter than other high-rise developments nearby, including the 37-story Moxxy and AC Hotel tower and the 43-story Hope + Flower apartment towers, one block north of the Project Site. As discussed in Finding Nos. 1, 5, and 8, the Project is located on a site designated for tall high-rise developments; as such, the Project would be consistent with the scale of development envisioned for this location and within the range of heights of existing developments in the surrounding area.

The Project would support planning goals envisioning the surrounding area as a thriving mixed-use community consisting of residential, commercial, and entertainment uses all

integrated into a walkable and transit-accessible neighborhood. Moreover, the Project's hotel component is immediately adjacent to commercial uses to the north and west, as well as the Metro E and A transit lines that run along South Flower Street, thereby locating the hotel further away from residential uses along Hope Street. Additionally, by limiting the alcohol request to on-site use only within the hotel, the alcohol service is contained and carefully regulated.

The sales of alcohol would not be detrimental to the Project's residents and nearby residential uses, as the establishments serving alcohol would be carefully controlled and monitored and are typical and expected in conjunction with hotel and ancillary restaurant uses. The proposed hours of operation for the restaurant/bar area are from 6:00 a.m. to 2:00 a.m. daily, in keeping with typical restaurant operations and other alcoholic beverage service requests commonly found throughout the City. Thus, the Project is not expected to have any significant additional adverse impacts and will be compatible with adjacent properties and the surrounding community. Nonetheless, conditions have been imposed to encourage responsible management and deter criminal activity. These conditions will ensure that the operation complies with all applicable regulations and that no aspects of the operation will adversely affect the surrounding area.

In addition, the request for reduced vehicle parking is appropriate in this location because the Project Site is located in a heavily urbanized commercial core in close proximity to a variety of transit options, including multiple bus lines and light-rail stations within one-quarter mile of the Project Site. In such a location, the request would enable the provision of services and amenities in a dense high-rise development without overburdening the Project to provide more vehicle parking than is necessary. The Project would still provide 283 vehicle parking spaces to meet the needs of the proposed uses on-site.

Therefore, as proposed and conditioned, the sale and dispensing of a full-line of alcoholic beverages and request for a 20 percent parking reduction at this location will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, of the public health, welfare, and safety and the development of the community.

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

The elements in the General Plan establish policies and provide the regulatory environment for managing the city and for addressing concerns and issues. The majority of the policies derived from the elements in the General Plan are in the form of Code Requirements, which collectively form the LAMC. The requested alcoholic beverage service is a conditionally permissible use, and thus does not propose to deviate from the requirements of the LAMC.

Pursuant to LAMC Section 12.36 D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. This finding is substantially identical to the finding found earlier in this document as Finding Nos. 1, 5, and 8 as well as Finding No. 12 below, which are hereby incorporated by reference. As discussed previously and below, the Project would be consistent with the purposes, intent and provisions of the General Plan and its applicable elements, including the Framework Element, Transportation Element, Health and Wellness Element, Air Quality Element, and the Land Use Element (Community Plan). Approval of the Project would enhance the built environment in the surrounding neighborhood and would provide a function that is fitting and compatible with the desired use of the subject property, the character of the surrounding community, and the commercial viability of the region as a whole.

The Project's proposed request for the sale and dispensing of a full line of alcoholic beverages for on-site consumption within the proposed hotel would be consistent with the Project's land use designation (Transit Core) and its associated goals and policies. Additionally, the area surrounding the Project Site is urbanized and features a range of similar mixed commercial developments, including multi-family apartments, hotels with restaurants and bars, as well as the Los Angeles Convention Center and LASED. Alcohol sales for on-site consumption as part of the hotel in the Project would be beneficial to public convenience and welfare, as the uses are situated in an infill location that is easily accessible to nearby visitors, employees, and residents.

The ability for the Project to offer a full line of alcoholic beverages would allow the hotel and ancillary restaurant/bar uses to remain competitive with other similar establishments in the area, as alcohol service is a common and expected component of such uses, and enhance the amenities offered. This would help ensure a vibrant mixture of land uses, reinforcing Downtown as the primary center of urban activity in the region.

In addition, the request for reduced vehicle parking is appropriate in this location because the Project Site is located in a heavily urbanized commercial core in close proximity to a variety of transit options, including multiple bus lines and light-rail stations within one-quarter mile of the Project Site. In such a location, the request would enable the provision of services and amenities in a dense high-rise development without overburdening the Project to provide more vehicle parking than is necessary, consistent with City goals to encourage transit and facilitate high-density development in such designated areas.

Therefore, the sale and dispensing of a full line of alcoholic beverages for on-site consumption as part of the hotel in the Project and request for a 20 percent parking reduction would be in substantial conformance with the General Plan and Community Plan.

Additional findings required per LAMC Section 12.24 W.1 (Conditional Use for Alcoholic Beverages):

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

The Project Site is zoned C2, which permits both commercial and residential development as well as the sale and dispensing of alcoholic beverages. The Project proposes a hotel and residential tower with ground-floor commercial uses. The request, in conjunction with the proposed hotel and its ancillary amenity spaces, will enhance the economic vitality of the surrounding community by providing additional dining, lodging, and recreational amenities.

As a hotel development with alcoholic beverage sales incidental to hotel and restaurant services, the proposed operations are unlikely to have any significant adverse impacts. The proposed hours of operation are from 6:00 a.m. to 2:00 a.m. daily, in line with typical restaurant operations and other alcoholic beverage service requests commonly found throughout the City. Alcoholic beverage service will be self-contained within designated areas on the Project Site and thus are unlikely to significantly impact adjacent properties. Furthermore, the closest commercial uses adjacent to the Project Site are located 100 to 200 feet to the west, while the nearest residential uses are approximately 300 feet southeast of the Site. As such, the Project is not expected to have any significant additional adverse impacts and will be compatible with adjacent properties and the surrounding community.

Negative impacts commonly associated with the sale of alcoholic beverages, such as criminal activity, public drunkenness, and loitering, will be mitigated by the imposition of conditions that require responsible management and deter loitering. Employees will undergo training on the sale of alcoholic beverages, including training provided by the Los Angeles

Police Department's (LAPD) Standardized Training for Alcohol Retailers (STAR) Program. Additional conditions regarding excessive noise, noise prevention, and litter management will safeguard the residential community.

Therefore, as proposed and conditioned, the sale and dispensing of a full line of alcoholic beverages within the proposed hotel will not adversely affect the welfare of the pertinent community.

- 10. The granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages, including beer and wine, in the area of the City involved, giving consideration to applicable State laws and to the California Department of Alcoholic Beverage Control's guidelines for undue concentration; and also giving consideration to the number and proximity of these establishments within a one thousand foot radius of the site, the crime rate in the area (especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace and disorderly conduct), and whether revocation or nuisance proceedings have been initiated for any use in the area.**

According to the California Department of Alcoholic Beverage Control (ABC) licensing criteria, four on-site and two off-site consumption licenses are allocated to the subject census tract (Census Tract 2240.1). Currently, there are three active on-site licenses and three active off-site licenses in this census tract.

According to statistics provided by LAPD's Central Bureau, Central Division within Crime Reporting District No. 192, which has jurisdiction over the subject property, a total of 269 crimes were reported in 2024, including 144 Part I crimes and 125 Part II crimes. This is compared to the Citywide average of 89 crimes and the High Crime Reporting District average of 106 crimes for the same reporting period. Alcohol-related Part II crimes reported include DUI (1) and Miscellaneous Other Violations (16). These numbers do not reflect the total number of arrests in the subject reporting district for the year, as arrests made in the calendar year may reflect crimes reported in previous years.

Concentration can be deemed undue when the addition of a license negatively impacts a neighborhood. However, concentration is not undue when the approval of a license provides a public service and benefits the community. In active commercial areas where there is a demand for licenses beyond the allocated number, the ABC has recognized that high-activity retail and commercial centers are supported by significant employee populations, in addition to the growing resident population base in the area. The ABC has discretion to approve an application if there is evidence that normal operations will not be contrary to public welfare and will not interfere with the quiet enjoyment of property by residents.

In this case, the subject property is located in the southern part of Downtown Los Angeles, a heavily urbanized and densely developed commercial core anchoring various entertainment venues, hotels, and restaurants. The Project will provide new and unique services and cater to both local residents and workers, as well as tourists and visitors, offering a complementary and beneficial service in this location. Additionally, an alcohol license would not be unusual or unexpected for a proposed new hotel with ancillary dining/bar services. In addition, the Project would add a new on-site license and thus would not exceed the allocated number of licenses to the census tract.

Furthermore, the Project will not adversely affect the public welfare, as the proposed self-contained operations within a new upscale hotel with incidental alcoholic beverage service

are unlikely to have a significant direct impact on the local crime rate, particularly considering the relatively low number of alcohol-related crimes in the area.

The proposed hotel and ancillary uses with alcoholic beverage service will be desirable uses in an area designated for such uses and part of a larger development, which would benefit from oversight of the building complex as a whole. The Project will provide valuable services and amenities to workers, visitors, and residents, and, as conditioned, will not negatively impact the area. Nonetheless, operational conditions have been incorporated to address noise, safety, and security, ensuring the proposed use is conducted with due regard for surrounding properties and reducing any potential crime issues or nuisance activity. Therefore, as proposed and conditioned, the sale and dispensing of a full line of alcoholic beverages within the proposed hotel will not result in undue concentration.

11. The proposed use will not detrimentally affect nearby residentially zoned communities in the area of the City involved, after giving consideration to the distance of the proposed use from residential buildings, churches, schools, hospitals, public playgrounds and other similar uses, and other establishments dispensing, for sale or other consideration, alcoholic beverages, including beer and wine.

The Project Site is zoned C2, which permits the hotel, residential, and ground-floor commercial uses proposed as part of the Project, as well as the sale and dispensing of alcoholic beverages. The following sensitive uses have been identified within 1,000 feet of the subject property:

- Multi-family residential buildings, 1600 and 1624 South Hope Street, located approximately 60 feet east (across Hope Street) from the Project Site
- LA Pilgrim Church, 1329 South Hope Street, located approximately 1,000 feet north of the Project Site
- Glory Church of Jesus Christ, 1801 South Grand Avenue, located approximately 450 feet south of the Project Site
- California Hospital Medical Center, 1401 South Grand Avenue, located approximately 250 feet north of the Project Site
- Venice Hope Park, a privately-owned open space, located approximately 230 feet north of the Project Site

Consideration has been given to the distance between the subject establishment and the above-referenced sensitive uses. The Project will not be detrimental to the surrounding neighborhood. The Project Site is located in the southern part of Downtown Los Angeles within a major entertainment center and commercial hub with a high concentration of entertainment venues, hotels, and restaurants. While residentially-zoned properties are in proximity to the Project Site, the surrounding area is considered a mixed-use neighborhood with existing residential, retail, office, and entertainment uses, and it would not be unusual for residentially-zoned properties to be located in proximity to alcohol-serving establishments.

In addition, the other sensitive uses are located farther away from the Project Site and are separated by several other properties serving as buffers from the Project. Additionally, the park across from the Project Site is a gated park with business hours, limiting its use, particularly in the evenings when alcoholic beverage service is more likely to be busier.

The sale of alcoholic beverages as part of the lobby restaurant/bar lounge and other amenity areas is a standard practice for hotels to attract and cater to their clientele and would be incidental to the Project's primary operation as a hotel with ancillary amenities. The sale of

alcoholic beverages within the proposed Project would be part of a new upscale hotel, and all alcohol service in such a facility would occur within a carefully controlled environment managed by a seasoned operator.

Moreover, the Project has been conditioned to protect the health, safety, and welfare of the surrounding neighbors from potential effects of excessive noise or disruptive behavior. Operational conditions have been incorporated to address noise, safety, and security, ensuring the proposed use is conducted with due regard for surrounding properties and reducing any potential crime issues or nuisance activity. Furthermore, the Project is consistent with the zoning and aligns with the existing uses adjacent to the development and the subject request would contribute to the neighborhood and serve the needs of neighboring residents, employees, and visitors.

Therefore, as proposed and conditioned, the sale and dispensing of a full line of alcoholic beverages within the proposed hotel will not detrimentally affect nearby residentially zoned communities or any other sensitive uses in the area.

Site Plan Review Findings

Following are the findings for Site Plan Review, for a development project which creates, or results in a net increase of 50 or more dwelling units and/or guest rooms, as required by LAMC Section 16.05.

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

The Project Site is currently developed with four low-rise commercial and warehouse buildings comprising approximately 89,510 square feet of floor area, as well as associated surface parking and alley areas. The Project proposes the demolition of all existing improvements for the construction of a new, mixed-use residential and commercial development consisting of two high-rise towers. Tower 1 (Hotel Tower) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space; and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space. The Project would result in a total of 452,630 square feet of floor area, with a maximum height of 260 feet (for the 23-story Residential Tower). An outdoor publicly accessible paseo would bisect the Project Site, running north-south between the two towers, connecting Venice Boulevard to the north to a proposed circular drive-aisle on the southern portion of the Project Site.

The Los Angeles General Plan sets forth goals, objectives and programs that guide both Citywide and community-specific land use policies. The General Plan is comprised of a range of State-mandated elements, including, but not limited to Housing and Conservation, Land Use, Noise, Safety, and Transportation. The City's Land Use Element is divided into 34 Community Plans that establish parameters for land use decisions within those sub-areas of the City. The Project is consistent with the various elements of the General Plan, including the Framework Element, Mobility Element (Mobility Plan 2035), Health and Wellness Element, Air Quality Element and the Land Use Element (Downtown Community Plan).

Framework Element

The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles,

including the Project Site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services.

The Project is consistent with the goals and objectives of the Framework Element as described below:

Chapter 3: Land Use

The Land Use Chapter of the Framework Element identifies objectives and supporting policies relevant to the Project Site. Those objectives and policies seek, in part, to encourage the development of commercial uses and structures that integrate a mix of commercial and residential uses. The Project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it accommodates development of a hotel, apartments, and commercial uses in accordance with the applicable policies of the Downtown Community Plan. Specifically, the Project would be consistent with the following goals and objectives, as set forth in the General Plan Framework Land Use Chapter:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

Objective 3.1: *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*

Objective 3.2: *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

Policy 3.2.3: *Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.*

Objective 3.4: *Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.*

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

The Project would provide a diverse mix of uses, including a hotel, residential units, and ground floor commercial space on an infill site in a heavily urbanized and central location. The Project would also provide 25,768 square feet of residential open space within the

Residential Tower in compliance with the LAMC, including a podium terrace with a pool, fitness center, lounge, and roof terrace. Additionally, some residents will have access to private open space in the form of balconies. The Hotel Tower would also provide amenity and recreation spaces, including two terraces totaling approximately 11,000 square feet and a 1,663 square-foot fitness center. Additionally, the Project would provide development that emphasizes pedestrian and bicycle access. A publicly accessible paseo bisecting the Project Site and connecting Venice Boulevard to the circular driveway in the rear of the Project would provide a usable and inviting amenity between the two Towers, featuring landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking and adding additional open space opportunities to the community. Bicycle parking spaces would be provided in accordance with LAMC requirements for residents, employees, and visitors on the ground floor at various locations throughout the Project Site, including short-term bicycle parking located along the street and paseo frontages and in front of the ground floor commercial spaces to both improve convenience and activate more of the Project Site. With this complementary mix of uses and integrated amenities, the Project will serve the needs of the City's existing and future residents, employees, and visitors.

The Project Site is located in a transit-rich area in close proximity to multiple bus and rail lines and stations, including the Pico Station and Grand/LATTC Station on the Metro A and E light-rail lines, ideal for the proposed scale and nature of development. The wide availability and proximity of transit options and colocation of uses in this location will provide convenient alternatives to driving, helping to reduce vehicle miles traveled and supporting the City's sustainability and mobility goals.

Thus, the Project would develop a mix of residential and commercial uses on a centrally-located site conducive to a variety of transit options, in support of goals advocating for such developments.

Chapter 5: Urban Form and Neighborhood Design

The Project is consistent with the following goals and objectives of the General Plan Framework Urban Form and Neighborhood Design Chapter:

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

Objective 5.2: *Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.*

Policy 5.2.2: *Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime (see [Chapter 3: Land Use](#)). Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics.*

Objective 5.5: *Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*

Objective 5.9: *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*

Policy 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.

The Project proposes a high-quality development that builds upon the existing urban modern architectural character of the surrounding area. The Project incorporates contemporary architectural design elements that are compatible with similar newer mid- and high-rise developments in the vicinity. The exterior building materials and features include retractable glass walls, metal panel screens, digital signs (as part of the Sign District), metal railings on residential balconies, and painted artwork within various terraces, which create a sleek contemporary design that complements other similar developments in the surrounding area.

The Project includes a variety of features that improve the enhance the public realm, including active ground floor frontages with commercial spaces and outdoor seating, street trees, and bike parking. Ground floor commercial spaces will have tall glass walls to increase transparency and improve the streetscape where there currently are plain building walls. The paseo is designed with decorative pavement, landscaped planters, and stainless steel planters and would replace an existing private alleyway, thereby physically improving the property and enhancing pedestrian safety. As such, the Project would enhance both the Project Site and the surrounding area.

Chapter 7: Economic Development

The Project is consistent with the following goals of the General Plan Framework Economic Development Chapter:

Goal 7A: A vibrant economically revitalized City.

Goal 7B: A City with land appropriately and sufficiently designed to sustain a robust commercial and industrial base.

Goal 7C: A City with thriving and expanding businesses.

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

Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.

Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements

The Project would contribute to the continued growth and success of the Downtown neighborhood by redeveloping a site currently developed with low-rise commercial buildings and surface parking with high-rise buildings containing a mix of residential and commercial uses. The Project would create 250 residential units of various types, including studios, one-bedroom, two-bedroom, and three-bedroom units, and bring additional housing to Downtown; 300 hotel guest rooms to support the economy and tourist and entertainment

industries; and ground floor commercial space to provide services and amenities for residents and visitors alike. The Project Site is in a centrally located and heavily urbanized urban core, ideal for the concentration of such uses. With its strategic location along major transit corridors and a complementary mix of residential and commercial uses, the Project would help accommodate future population growth while providing jobs and serving visitors. By concentrating development near transit infrastructure, the Project supports the optimization and sustainability of recent and planned infrastructure investments.

Housing Element

The City's Housing Element for 2021–2029 (Housing Element) was adopted by the Los Angeles City Council on November 24, 2021. The Project is consistent with the following goal, objective, and policy of the Housing Element:

Goal 3: *A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.*

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

Policy 3.2.1: *Promote the integration of housing with other compatible land uses at both the building and neighborhood level.*

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

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

The Project would redevelop a site currently occupied by low-rise commercial buildings and surface parking with a new high-rise, mixed-use residential and commercial development. The Project proposes a Residential Tower containing 250 dwelling units of various sizes, including studio, one-bedroom, two-bedroom, and three-bedroom units. The Project also includes a Hotel Tower with 300 guest rooms, and over 13,000 square feet of ground floor commercial space. Together, the Project's mix of uses reflects a sustainable land use pattern that provides housing, jobs, services, and amenities.

The Project is also located in a Transit Priority Area in close proximity to various modes of transit, which helps reduce the Project's overall environmental footprint and supports lower per capita greenhouse gas emissions by promoting alternatives to private vehicle use. The Project would also implement improvements in the public right-of-way, including new sidewalks, street trees, and upgraded street lighting. These enhancements will improve pedestrian safety, increase walkability, and enrich the overall public realm, thereby facilitating the use of transit and promoting health through a pedestrian-oriented design.

Therefore, by introducing sustainable buildings and a land use pattern that combines a hotel and multi-family housing within a mixed-use development with convenient access to jobs, amenities, and transportation, the Project directly supports the goals, objectives, and policies of the Housing Element.

Mobility Element (Mobility Plan 2035)

The Mobility Plan 2035, adopted in September 2016, serves as the Mobility Element of the General Plan and guides development of a citywide transportation system with the goal of ensuring the efficient movement of people and goods and recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, reduction of vehicle trips, and focused growth in proximity to public transit. The Mobility Plan 2035 includes goals that define the City's high-level mobility priorities and sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The Project would be in conformance with the following policies of the Mobility Element:

Chapter 2: World Class Infrastructure

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

Chapter 3: Access for All Angelenos

Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City's transportation system.

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

Policy 3.5: Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.

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

The Project Site is located within a designated Transit Priority Area and is well-served by public transit, including both rail and bus service. Specifically, the Project Site is located approximately 1,300 feet south of the Pico Station and approximately 1,000 feet north of the Grand/LATTC Station on the Metro A and E light-rail lines. Additionally, eight local and regional transit operators operate bus lines within one-quarter mile of the Project Site, including Metro, LADOT DASH, LADOT Commuter Express, Foothill Transit, Orange County Transportation Authority, Santa Monica Big Blue Bus, Gardena Municipal Bus Lines, and Montebello Bus Lines.

The Project's site design emphasizes safe, convenient access to surrounding neighborhood amenities and transit while fostering an active pedestrian and bicycle-friendly environment by providing multimodal access for vehicles, pedestrians, and bicycles. Vehicular access would be provided via a single driveway off Hope Street to the rear of the Project Site, minimizing the impacts of vehicles on pedestrians. Pedestrian access across the Project Site would be provided via a publicly accessible paseo; and bicycle parking would be provided in several locations along the street frontages, along the paseo, and near the entrances to the ground floor commercial spaces and tower lobbies, as well as within both the Hotel Tower and Residential Towers. The Residential Tower would feature a dedicated

workspace within the long-term bicycle parking room on the ground floor, conveniently located near the elevators and lobby. These amenities are designed to encourage cycling and walking, thereby promoting healthier lifestyles and reducing emissions

The Project would collocate residential, commercial service, and hotel uses within one cohesive development, reflective of a land use pattern that would provide greater convenience and accessibility and reduce vehicle trips. The Project is also within walking distance of numerous destinations in Downtown Los Angeles, including retail, restaurants, and entertainment venues along Figueroa Street. The proximity to key regional destinations such as the Los Angeles Convention Center, Crypto.com Arena, Peacock Theater, and L.A. LIVE would allow hotel guests and residents to travel without relying on private vehicles, further reducing overall vehicle trips.

Streetscape improvements would enhance the pedestrian environment around the Project Site. The Project would also implement improvements in the public right-of-way, including upgraded sidewalks, street trees, and street lighting. The ground floor street frontages and along the paseo would be activated with commercial uses and lobbies for the two towers.

The Project would create a mixed-use residential and commercial development with thoughtful bicycle parking siting, streetscape-activating ground floor commercial uses lining the primary corridors, and a pedestrian-oriented paseo in a transit-rich location. In addition, the Project would implement all required dedications and improvements, such as sidewalk widening, to meet the needs of all forms of mobility. Accordingly, the Project would be consistent with the street standards and mobility objectives outlined in Mobility Plan 2035.

Health and Wellness Element

Adopted in March 2015, the Plan for a Healthy Los Angeles lays the foundation to create healthier communities for all Angelenos. As the Health and Wellness Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City of Los Angeles will strive to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The Project is consistent with the following:

Chapter 2: A City Built for Health

Policy 2.2: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.

Chapter 5: An Environment Where Life Thrives

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

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

Air Quality Element

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

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

The Project would develop two, new high-rise towers with 300 hotel guest rooms, 250 residential units, and over 13,000 square feet of ground floor commercial uses in the southern part of Downtown Los Angeles, an area well-served by multiple public transit lines and experiencing rapid growth and high-rise development. By locating residential and commercial uses near transit and existing entertainment, residential, and commercial destinations, the Project would reduce vehicle miles traveled and decrease reliance on single-occupancy vehicle trips. The Project would also promote bicycle access by including short-term bicycle parking in a variety of locations along the street frontages, paseo, and ground floor commercial spaces, as well as by providing long-term bicycle parking located within both the Hotel Tower and Residential Towers. The Residential Tower would feature a dedicated workspace within the long-term bicycle parking room on the ground floor, conveniently located near the elevators and lobby. These amenities are designed to encourage cycling and walking, thereby promoting healthier lifestyles and reducing emissions.

The Project would also enhance the public realm by creating a central paseo bisecting the Project Site, along with landscaping and new trees. Additionally, both the Hotel and Residential Towers would offer open space in the form of terraces, fitness centers, lounges, and pool decks. By providing recreational opportunities for residents and visitors, the Project would contribute to a healthy urban environment and helping to reduce pollution.

In line with smart growth principles, the Project would deliver infill development adjacent to employment centers and transit, while incorporating sustainable building practices. The Project would comply with CALGreen and the Los Angeles Green Building Code, thereby reducing energy and water use. Additionally, per code requirements, at least 30 percent of the total code-required parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of spaces would be equipped with EV chargers. The Project's proximity to major transit infrastructure would also encourage the use of alternative modes of transportation and further reduce energy consumption and emissions, which would directly support a reduction in per capita greenhouse gas emissions from residents, employees, and visitors, particularly those traveling by private vehicle. Through adherence to applicable codes and conditions, the Project would be consistent with other relevant policies, including Policy 5.1.2 of the Air Quality Element, by ensuring that new development is energy-efficient and promotes the use of clean, non-polluting energy sources. The EV parking also provides a valuable amenity for residents, employees, and visitors who utilize electric-powered equipment or vehicles.

In summary, the Project would provide service amenities that improve the habitability and functionality of the development for on-site users while minimizing impacts on neighboring properties. As such, the Project would foster a healthy built environment, encourage sustainable living, reduce air pollution, and support land use policies aimed at lowering per capita greenhouse gas emissions.

Land Use Element (Downtown Community Plan)

The Project Site is located within the Downtown Community Plan, one of 34 Community Plans which together form the Land Use Element of the General Plan. Pursuant to LAMC Section 12.36, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. As detailed above in Finding Nos. 1, 5, and 8, the Project is in substantial conformance with the purposes, intent and provisions of the Downtown Community Plan as well as the Downtown Design Guide. As such, the Project substantially conforms with the Land Use Element of the General Plan.

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

The Project Site is located in the southern part of Downtown Los Angeles and is bounded by Venice Boulevard to the north, South Hope Street to the east, an unnamed alley and the Interstate 10 freeway to the south, and Flower Street to the west. The Project Site is currently developed with four low-rise commercial buildings and associated surface and rooftop parking. A private alleyway bisects the Project Site and provides access from Venice Boulevard to the rear parking area. The Project proposes to demolish all existing improvements for the development of a new mixed-use development consisting of a 22-story Hotel Tower with 300 guest rooms, a 23-story Residential Tower with 250 residential dwelling units, and 13,120 square feet of ground floor commercial space. At completion, the Project would total 452,630 square feet of floor area, and would rise to a maximum of 260 feet (for the Residential Tower).

Bulk, Mass, Height

The Project Site is located in a heavily urbanized area and generally surrounded by low- and mid-rise commercial and residential buildings, although several high-rise developments are located one- to two-blocks west and north of the Project Site. To the north of the Project Site, across Venice Boulevard, are a one-story commercial building and the Venice Hope Park. To the east of the Project Site, across Hope Street, are four- and six-story affordable housing buildings. To the south of the Project Site, across the public alley, is the Interstate 10 freeway. To the west of the Project Site, across Flower Street, are one-story warehouse buildings and surface parking.

While the Project Site is generally surrounded by low- and mid-rise buildings, this part of Downtown continues to experience rapid growth with the introduction of taller buildings with a variety of residential, commercial service, and hotel uses being introduced within an area previously concentrated with low-scale commercial uses. With a maximum height of 23 stories and 260 feet, the Project would be similar in scale to or shorter than other high-rise developments nearby, including the 37-story Moxy and AC Hotel tower and the 43-story Hope + Flower apartment towers, one block north of the Project Site. As discussed in Finding Nos. 1, 5, and 8, the Project is located on a site designated for tall high-rise developments; as such, the Project would be consistent with the scale of development envisioned for this location and within the range of heights of existing developments in the surrounding area.

The Project design consists of two towers each above a five-story podium which would mirror the prevailing mid-rise massing in the immediate vicinity of the Project Site. Above the podium level, the towers are slender and rectangular-shaped and face perpendicular to

each other, creating variation in mass and form. Additionally, both towers feature open terrace levels and architectural features that cut into the tower buildings, adding visual interest and further reducing bulk and mass.

As such, the Project employs architectural design features to reduce perceived scale, and the proposed height, bulk, and mass of the Project would be consistent with the scale of existing and future proposed developments within the surrounding neighborhood.

Setbacks

The Project is subject to the setback requirements of the underlying C2 Zone. Pursuant to LAMC Section 12.22 A.18, setbacks are not required for mixed-use residential and commercial projects in the C2 Zone provided that such projects provide only commercial uses on the ground floor and only residential uses on the upper floors. The Project meets these requirements and therefore is not required to provide any building setbacks. However, the Project provides step-backs at the upper levels, as both towers have outdoor podium decks on Level 5; above Level 5 the Hotel Tower rises above the western portion of its podium and leaves the eastern portion open to the sky, while the Residential Tower rises above the southern portion of its podium and leaves the northern portion open to the sky. As such, the Project creates both appropriate separation distances between the two towers as well as external step-backs above the ground floor.

Off-Street Parking and Loading Areas

Vehicular access to the Project would be provided from a driveway off of Hope Street at the southeastern corner of the Project Site, which leads to a circular on-site pick-up/drop-off area and ramps leading to the parking levels in each tower. Loading areas are also located off of the circular driveway. All driveways and access would be designed in accordance with the LADOT standards. By siting vehicular access and loading along the rear of the Project Site, the Project minimizes impacts and interruptions on the streetscape and orients the Project's active uses towards the primary street and paseo frontages.

The Project would provide 283 vehicle parking spaces for the proposed uses, including eight spaces reserved for the property at 1721 South Flower Street, as required by Condition No. 7 of Case No. ZA-2003-9927-CUX-PA5-1A, within three above-grade parking levels contained within two podium structures (one at the base of each proposed tower building). The parking levels would be screened with metal panels and mesh, as depicted in the architectural plans in Exhibit A, to shield the view of cars and headlights from view from any public rights-of-way. The Project would also install 10 percent of the total provided parking spaces with EV chargers and design an additional 20 percent of the total provided parking spaces for EVSE, in compliance with the LAMC.

The Project would also provide bicycle parking spaces in accordance with LAMC requirements. Short-term bicycle parking would be located throughout the Project Site at the ground floor along the street frontages, within the paseo, and in front of the commercial storefronts, thereby enhancing convenience and useability. Long-term bicycle parking would be located within dedicated storage lockers in both the Hotel Tower and Residential Tower.

Landscaping

Currently, there are no existing trees or other significant landscaping on the Project Site. The Project would provide new landscaping on the Project Site in the form of landscaped planters along the paseo and planted trees at the ground level and on the upper and rooftop outdoor terraces in each tower. The Project would also cover a minimum of 25 percent of

the provided residential open space with ground cover, trees, or other plant cover. The Project would also plant new street trees in the public right-of-way (per the requirements and to the satisfaction of the Bureau of Street Services, Urban Forestry Division). As such, the Project would improve the existing Project Site with additional landscaping that would enhance the physical environment of the surrounding community.

Trash Collection

As conditioned, all trash and recycling areas would be enclosed and screened from public view, accessed via the vehicle driveway at the rear of the Project Site. Enclosing trash collection with the building envelope will prevent any negative impacts on surrounding properties.

Lighting & Building Signage

The Project would introduce new residential, hotel, and commercial service uses that would include accent and security lighting in compliance with LAMC requirements, and consistent with lighting levels provided for adjacent commercial and residential uses. In addition, as discussed in Finding Nos. 1 and 2, the Project includes a proposed Sign District that would permit a variety of sign types and dimensions, including Supergraphic and Digital Display signs, displaying both on-site and off-site signage. The proposed Sign District includes a comprehensive set of development standards and guidelines governing signage illumination, including limitations that restrict light intensity to no more than three foot-candles above ambient lighting as measured at the property line of the nearest residentially zoned property, and illumination for Digital Display signs to no more than 5,000 candelas per square meter during the daytime and no more than 300 candelas per square meter during the nighttime. In addition, certain light types such as strobe and flashing lights are prohibited. The Sign District would also require illumination testing protocols and certification from LADBS for digital displays to ensure ongoing compliance with these regulations. Therefore, the Project's lighting and signage features will be in compliance with the LAMC or as otherwise permitted by the proposed Sign District.

14. Any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

The Project would include a total of 25,768 square feet of residential open space in the Residential Tower, including a 2,043 square-foot lobby/lounge on the ground floor; a 9,630 square-foot outdoor podium terrace, a 2,000 square-foot indoor fitness center, and a 1,500 square-foot indoor lounge on Level 5; a rooftop outdoor terrace on Level 23 that would include a pool, multiple seating areas, a fireplace, planters and trees, and a 676 square-foot indoor amenity room on Level 23. Certain residential units would also have access to private balconies, with 5,050 square feet of such balconies counting towards LAMC requirements (although in practice the balcony areas would total a greater amount). The Project would also provide additional open space which is not counted towards the Project's residential open space requirement, such as the 4,200 square-foot publicly accessible paseo, an additional 1,800 square-foot outdoor terrace on Level 9, and recreational and service amenities in the Hotel Tower, including two outdoor terraces totaling 11,000 square feet and a 1,663 square-foot fitness center. As such, the Project provides recreational and service amenities for residents and visitors alike, which will minimize impacts on neighboring properties.

Director's Determination Findings

Following are the findings for the request to 10 percent reduction in the total required usable open space, as required by LAMC Section 12.21 G.3(c).

15. The open space provided conforms with the objectives of LAMC Section 12.21 G.

The purpose of LAMC Section 12.21 G is to ensure that residential projects include a sufficient amount of open space to provide recreational amenities and improve habitability for residents. An Applicant may request a reduction of 10 percent in the required amount of residential open space provided such reduction is in the required amount of common open space only. With the number and typology of residential units proposed, the Project would be required to provide 26,925 square feet of open space. As the Project proposes 5,050 square feet of private open space to be counted towards LAMC requirements by way of balconies, the Project would otherwise be required to provide 21,875 square feet of common open space. In conjunction with the requested 10 percent reduction in common open space, a total of 19,688 square feet of common open space would be required. The Project proposes 20,718 square feet of common open space and a total 25,768 square feet of open space within the Residential Tower, and thus meets the requirements of this section.

The Residential Tower includes a 2,043 square-foot lobby/lounge on the ground floor; a 9,630 square-foot outdoor podium terrace, a 2,000 square-foot indoor fitness center, and a 1,500 square-foot indoor lounge on Level 5; a rooftop outdoor terrace on Level 23 that would include a pool, multiple seating areas, a fireplace, planters and trees, and a 676 square-foot indoor amenity room on Level 23. Certain residential units would also have access to private balconies, with 5,050 square feet of such balconies counting towards LAMC requirements (although in practice the balcony areas would total a greater amount). The Project would also provide additional open space which is not counted towards the Project's residential open space requirement, such as an additional 1,800 square-foot covered outdoor terrace on Level 9, the 4,200 square-foot publicly accessible paseo, and recreational and service amenities in the Hotel Tower, including two outdoor terraces totaling 11,000 square feet and a 1,663 square-foot fitness center. As such, the Project provides recreational and service amenities for residents and visitors alike, and meets the intent of the LAMC.

16. The proposed project complies with the total usable open space requirements.

The Project complies with the various requirements of useable open space as outlined in LAMC Section 12.21 G(2). Common open space would constitute more than 50 percent of the total amount of open space, be open to the sky, be readily accessible to all residents, and meet the dimensional and siting requirements outlined in the LAMC. A minimum of 25 percent of outdoor open space would be planted and trees planted above the ground floor would have adequate soil depth to ensure viability. The Project would also provide common indoor open space and private open space in the form of balconies for certain residential units, all of which would meet the dimensional and sizing requirements outlined in the LAMC. As such, the Project meets the requirements of this section.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

The City of Los Angeles, as the Lead Agency, prepared a Sustainable Communities Environmental Assessment (SCEA), Case No. ENV-2018-3337-SCEA, and an Erratum dated September 2024, for the proposed Project, which includes the construction of a two-tower, mixed-use development consisting of 250 residential dwelling units, 300 hotel guest rooms, and 13,120 square feet of ground floor commercial uses. At its meeting on October 1, 2024 (Council File No. 24-0812) and after consideration of all comments received regarding the SCEA and the Project,

the City Council adopted the SCEA pursuant to Public Resources Code (PRC) Section 21155.2(b), finding that the Project is a "transit priority project" as defined by PRC Section 21155 and has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior Environmental Impact Reports (EIRs), including SCAG 2020-2045 RTP/SCS EIR; finding all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA; finding with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; finding the SCEA reflects the independent judgement and analysis of the City; finding the mitigation measures have been made enforceable conditions on the project; and adopted the SCEA and the Mitigating Monitoring Program prepared for the SCEA.