

ZA-2017-4845-ZAI



APPLICATIONS:

DEPARTMENT OF CITY PLANNING APPLICATION

THIS BOX FOR CITY PLANNING STAFF USE ONLY

Case Number ZA-2017-4845-ZAI
Env. Case Number ENV-2017-3264-EIR
Application Type ZAI
Case Filed With (Print Name) Edber Macedo Date Filed 11/17/17

Application includes letter requesting:

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

Provide all information requested. Missing, incomplete or inconsistent information will cause delays. All terms in this document are applicable to the singular as well as the plural forms of such terms.

1. PROJECT LOCATION

Street Address 1 1033-1057 South Olive Street, Los Angeles, CA 90015 Unit/Space Number
Legal Description 2 (Lot, Block, Tract) Lots FR 1, 3, 4 of Hayward's Subdivision of Part of Block 70
Assessor Parcel Number 5139-010-001, 002, 008, 010, 011 Total Lot Area 57,829

2. PROJECT DESCRIPTION

Present Use Commercial
Proposed Use Mixed Use - Residential and Commercial
Project Name (if applicable) 1045 Olive
Describe in detail the characteristics, scope and/or operation of the proposed project This request is for a Zoning Administrators Interpretation in conjunction with Case No. CPC-2017-3251-TDR-MCUP-SPR.

Additional information attached [X] YES [] NO

Complete and check all that apply:

Existing Site Conditions

- Site is undeveloped or unimproved (i.e. vacant)
Site has existing buildings (provide copies of building permits)
Site is/was developed with use that could release hazardous materials on soil and/or groundwater (e.g. dry cleaning, gas station, auto repair, industrial)
Site is located within 500 feet of a freeway or railroad
Site is located within 500 feet of a sensitive use (e.g. school, park)
Site has special designation (e.g. National Historic Register, Survey LA)

1 Street Addresses must include all addresses on the subject/application site (as identified in ZIMAS—http://zimas.lacity.org)
2 Legal Description must include all contiguously owned properties (even if they are not a part of the proposed project site)

Proposed Project Information

- Demolition of existing buildings/structures
- Relocation of existing buildings/structures
- Interior tenant improvement
- Additions to existing buildings
- Grading
- Removal of any on-site tree
- Removal of any street tree
- New construction: 751,777 square feet
- Accessory use (fence, sign, wireless, carport, etc.)
- Exterior renovation or alteration
- Change of use and/or hours of operation
- Haul Route
- Uses or structures in public right-of-way
- Phased project

Housing Component Information

Number of Residential Units: Existing 0 – Demolish(ed)³ 0 + Adding 794 = Total 794
 Number of Affordable Units⁴ Existing N/A – Demolish(ed) N/A + Adding N/A = Total N/A
 Number of Market Rate Units Existing 0 – Demolish(ed) 0 + Adding 794 = Total 794
 Mixed Use Projects, Amount of Non-Residential Floor Area: 12,504 square feet

Public Right-of-Way Information

Have you submitted the Planning Case Referral Form to BOE? (required) YES NO
 Is your project required to dedicate land to the public right-of-way? YES NO
 If so, what is/are your dedication requirement(s)? 3 ft.
 If you have dedication requirements on multiple streets, please indicate: _____

3. ACTION(S) REQUESTED

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

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

Authorizing section LAMC 12.21. A.2. Section from which relief is requested (if any): _____

Request: Request for a Zoning Administrators Interpretation to review Floor Area calculations related to balconies and open-space areas in residential projects.

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

Request: _____

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

Request: _____

Additional Requests Attached YES NO

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

⁴ As determined by the Housing and Community Investment Department

4. RELATED DEPARTMENT OF CITY PLANNING CASES

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

If YES, list all case number(s) CPC-2017-3251, ENV-2016-4630-EIR, VTT-74531-CN

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

Case No. CPC-2017-3251 Ordinance No.: _____

- Condition compliance review
- Clarification of Q (Qualified) classification
- Modification of conditions
- Clarification of D (Development Limitations) classification
- Revision of approved plans
- Amendment to T (Tentative) classification
- Renewal of entitlement
- Plan Approval subsequent to Master Conditional Use

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

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

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

Vesting Tentative Tract Map No. 74531

5. OTHER AGENCY REFERRALS/REFERENCE

To help assigned staff coordinate with other Departments that may have a role in the proposed project, please check all that apply and provide reference number if known.

Are there any outstanding Orders to Comply/citations at this property? YES (provide copy) NO

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

Development Services Case Management Number _____

Building and Safety Plan Check Number _____

Bureau of Engineering Planning Referral (PCRF) BOE letter dated May 9, 2017 from Edmund Yew

Bureau of Engineering Hillside Referral _____

Housing and Community Investment Department Application Number _____

Bureau of Engineering Revocable Permit Number _____

Bureau of Sanitation, Low Impact Development (LID) Referral # 1045 S. Olive

Other—specify _____

PROPERTY OWNER

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

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

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

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

Signature  _____

Date 11/15/2017

Print Name Elliott Kahn

Signature _____

Date _____

Print Name _____

6. PROJECT TEAM INFORMATION (Complete all applicable fields)

Applicant⁵ name Elliott Kahn
Company/Firm 1045 Olive, LLC
Address: 2200 Biscayne Boulevard Unit/Space Number _____
City Miami State FL Zip Code: 33137
Telephone (424) 653-2100 E-mail: EK@crescentheights.com
Are you in escrow to purchase the subject property? YES NO

Property Owner of Record Same as applicant Different from applicant
Name (if different from applicant) _____
Address _____ Unit/Space Number _____
City _____ State _____ Zip Code: _____
Telephone _____ E-mail: _____

Agent/Representative name Alexander Irvine
Company/Firm Irvine & Associates, Inc.
Address: 633 W. 5th Street Unit/Space Number 3200
City Los Angeles State CA Zip: 90071
Telephone (213) 694-3107 E-mail: Alex@Irvineassoc.com

Other (Specify Architect, Engineer, CEQA Consultant etc.) Legal Council
Name Ryan M. Leaderman, Esq.
Company/Firm DLA Piper
Address: 633 W. 5th Street Unit/Space Number 3200
City Los Angeles State CA Zip Code: 90071
Telephone (213) 694-3115 E-mail: ryan.leaderman@dlapiper.com

Primary Contact for Project Information Owner Applicant
(select only one) Agent/Representative Other

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

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

Space Below For Notary's Use

California All-Purpose Acknowledgement

Civil Code ' 1189

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

State of California

County of Los Angeles

On 11/15/17 before me, David Alan Stewart
(Insert Name of Notary Public and Title)

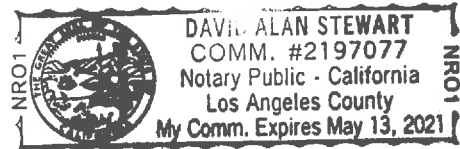
personally appeared ELLIOTT ELYHAU KAHN who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s)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

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

WITNESS my hand and official seal.

[Signature]
Signature

(Seal)



I. SUMMARY OF REQUESTS FOR ZONING ADMINISTRATOR INTERPRETATIONS

Pursuant to LAMC Section 12.21.A.2, the Applicant requests that the Zoning Administrator make the following Interpretations for the Project:

- 1) An interpretation supplementing Case No. ZA 2007-3430 ("ZAI 3430") that specifies that all parts of the Project's wrap-around balconies, including corner areas, do not fit the definition of Floor Area under Los Angeles Municipal Code ("LAMC") § 12.03, even if some or all of such areas do not count toward meeting the Project's open space requirement.
- 2) An interpretation of the LAMC to clarify that the *covered* exterior open space provided within the Project's open space building cutout features are not considered Floor Area and meet the LAMC definition of "Common Open Space" even though they are partially covered, in line with recent City precedent. The Applicant further requests that, if the building cutout areas are not counted as Common Open Space, there be an interpretation that these spaces qualify as "Recreation Rooms" under LAMC § 12.21-G.2(a)(4)(i), to allow the areas to be counted, to the available extent, as interior Common Open Space.

These Zoning Administrator Interpretations would promote City policies supporting the provision of ample open space by enabling the maximization of legitimate open space in the Project, a 70-story downtown tower on a 57,829 square foot lot where opportunities for open space are limited and commonsense interpretations are needed to ensure the Project can meet the competing goals of providing ample open space while meeting floor area limits.

II. BACKGROUND

A. Pertinent LAMC Definitions

LAMC § 12.03 provides the following definitions of Building and Floor Area:

BUILDING. Any structure having a roof supported by columns or walls, for the housing, shelter or enclosure of persons, animals, chattels or property of any kind

FLOOR AREA. The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and Basement storage areas.

B. ZAI 3430 Policy Regarding Open Space and Floor Area

As stated in ZAI 3430:

A deck or balcony that is not recessed but projects beyond the perimeter of a building is exposed to the elements, and so therefore is not habitable space that intensifies a building's use in the same way that an extra bedroom, bathroom or other habitable room

would. A balcony or deck is accessory to the main dwelling unit. In a multi-family residential project it takes the place of a front or back yard. The developer of a multi-family project complying in good faith with the Code's open space provisions should not be penalized for this compliance by having these types of balconies or decks counted against the project's floor area cap. (ZAI 3430, at p. 3.)

The requested interpretations would correspond with the policy rationale underlying ZAI 3430 to maximize recreational open space by not subjecting such open space to LAMC limitations on Floor Area applicable to new development projects such as the Project.

III. WRAP AROUND BALCONIES ARE NOT FLOOR AREA

ZAI 3430 interprets the LAMC to exclude balcony space from Floor Area if the balcony space meets certain criteria. ZAI 3430 mandates that the entirety of any: (1) balcony or deck, (2) covered or uncovered, (3) regardless of size or shape, and (4) cantilevered or supported by columns or beams, shall not create Floor Area for FAR purposes so long as it:

1. is not recessed but projects beyond the perimeter of the building;
2. remains unenclosed except for guard rails required by the Building Code;
3. qualifies as private open space under LAMC § 12.21-G.2.(b)(2).

The Project's proposed wrap-around balconies meet these criteria and should thus not count as Floor Area:

1. The Project's wrap around balconies project beyond the perimeter of the building because they extend outside of the perimeter of the building's roof and walls. See **Exhibit A**. Buildings are defined by the LAMC as "[a]ny structure having a roof supported by columns or walls, for the housing, shelter or enclosure of persons, animals, chattels or property of any kind." This interpretation should verify that the Project's balcony guard rails and support columns are not walls to verify that the entirety of the wrap-around balconies meet this criterion.
2. The Project's wrap-around balconies are unenclosed except for guard rails.
3. The Project's wrap-around balconies qualify as private open space under LAMC § 12.21-G.2 because are accessible from a single dwelling unit and include dividers and other screening separating different units' private open space, and meet the size, dimension and clearance requirements under that provision. See **Exhibit B**.

Under ZAI 3430, the entirety of balconies do not count as Floor Area, even for portions that may not count as Open Space:

While sub-subparagraph (i) further limits to 50 square feet per dwelling unit the amount of private open space that may count toward a project's total open space requirement, all qualifying private open space that a project provides shall benefit from this interpretation. (ZAI 3430, at p. 4.)

Based on this language, the requested interpretation clarifying ZAI 3430 should specify that all parts of the Project's wrap-around balconies, including corner areas, are not considered Floor Area under LAMC § 12.03, even if portions of such areas do not count toward meeting the Project's Open Space requirement. This interpretation is supported by past City actions, including the Figueroa Central project located at 1101 S Flower Street (DIR-2014-3676). As shown in the attached Elevations and Floor Area and Open Space Tabulations, this project utilized wrap around balconies and cantilevered projections which were not counted as Floor Area. See attached **Exhibit C**.

In line with General Plan policy, the entirety of the Project's wrap-around balconies, including corner areas, would be exposed to the elements, are accessory to dwelling units, are not maintained as habitable space, and do not intensify the use of the Project. Rather, as with other types of balconies, the Project's wrap-around balconies would provide usable exterior outdoor space for its residential dwelling units within a high-rise building. Moreover, the entirety of the Project's wrap around balconies would be outside of the building's exterior walls, and therefore would not meet the LAMC definition of Floor Area, which only applies to areas within a building's walls. (LAMC § 12.03.) **See Exhibit A**. Based on ZAI 3430 and the General Plan policy, the entire square footage of the Project's wrap-around balconies should thus not be counted as Floor Area, including corner areas, similar to how the City treated the Figueroa Central project, as depicted in **Exhibit C**. This commonsense interpretation should be set forth in a Zoning Administrator's Interpretation so that the Project can utilize this same interpretation of the definition of Floor Area as the Figueroa Central Project.

To account for the Project's wrap-around balconies, the City may require the Applicant to agree to a condition of approval and/or to record a covenant and agreement to ensure the entirety of wrap-around balcony space is maintained as open space. If required, the covenant and agreement should explicitly allow dividers or other screening that would separate Project balconies.

IV. OPEN SPACE CUTOUPS AND COVERED OPEN SPACE ARE NOT FLOOR AREA AND SHOULD BE CREDITED AS COMMON OPEN SPACE

The Applicant also requests a Zoning Administrator Interpretation of the LAMC to clarify that covered exterior open space provided within an in-building open space cutouts provided within the Project are not considered Floor Area regardless of whether they meet the definition of "Common Open Space" due to being covered.

LAMC § 12.21-G.2.(a) defines Common Open Space as follows:

COMMON OPEN SPACE: Common open space shall meet each of the following requirements:

- (1) Be open to the sky and have no structures that project into the common open space area, except as provided in Section 12.22 C.20(b).
- (2) Be readily accessible to all the residents of the site,
- (3) Have a minimum area of 400 sq. ft. with no horizontal dimension less than 15 feet when measured perpendicular from any point on each of the boundaries of the open space area,

- (4) Constitute at least 50% of the total required usable open space in developments built at an R3, RAS3, R4, RAS4, and/or R5 density regardless of the underlying zone.

In projects where opportunities for outdoor space are limited, particularly for infill and high rise/high density development projects such as the Project, open space may need to be provided within the footprint of a building, either as partially covered open space or, as with the Project, as building cutouts. Moreover, in many high rise and other large scale projects like the Project, out of design aesthetic or necessity, architectural features are often designed directly over open space areas. In addition to being practical, such features can provide iconic architecture and visually stimulating design variation while meeting the purpose of LAMC § 12.21G(1) by “afford[ing] occupants of multiple residential dwelling units opportunities for outdoor living and recreation,” and “provid[ing] a more desirable living environment . . .” **See Exhibit A.**

As a result of being fully or partially covered, the City has at times taken the position that such open space is excluded from the definition of Common Open Space due to not being “open to the sky,” *and therefore that such areas should also be considered Floor Area.*

However, just because an open space area is covered does not mean the covered open space should automatically be defined as Floor Area. As with balconies, the Project’s open space cutouts are still “exposed to the elements” in that they are open to the sky on two sides, and are certainly “not habitable space that intensifies a building’s use in the same way that an extra bedroom, bathroom or other habitable room would.” (ZAI 3430, at p. 3.) The Project’s interior open space cutouts would also be accessory to the Project’s main dwelling units, and would provide permanent recreational areas for the Project’s residents and guests in line with General Plan open space policy. As with ZAI 3430’s determination regarding why balconies should not be counted as Floor Area, the “developer of a multi-family project complying in good faith with the Code’s open space provisions should not be penalized for this compliance” by having valid non-habitable open space “counted against the project’s floor area cap.” (ZAI 3430, at p. 3.) Moreover, where open space cutouts are outside of a building’s exterior walls as the case with the Project because the open space cutouts occupy multiple floors and are walled off, they should not be determined to meet the LAMC definition of Floor Area. (LAMC § 12.03.)

The fact that the Project’s interior open space cutouts are partially covered does not detract from their character as open space or render the areas as habitable Floor Area. Partial coverings enable the utilization of Common Open Space for recreational purposes in the rain and provide shade during hot weather. Coverings do not reduce the usable Common Open Space area. Rather, they create more opportunities to use the Common Open Space under different conditions. Therefore, excluding the Project’s building cutouts from its Floor Area calculation is in conformance with the intent of the General Plan and Zoning Code to promote the maximization of open space, particularly for an infill Project where opportunities for providing recreational open space are extremely limited. **See Exhibit B.** Both excluding covered Common Open Space from being Floor Area and giving Common Open Space credit to covered Common Open Space for the Project would be consistent with a number of recent City approvals.

For the 8150 Sunset project (Case Number CPC-2551-MCUP-DB-SPR), the City approved architectural features projecting over that project's 7th floor Amenity Deck. See attached **Exhibit D**. The approved floor plans call out which portions of this deck were included as Floor Area. The areas directly under the architectural projections were not counted as Floor Area. See attached **Exhibit E**. It is apparent that Common Open Space credit was given for this covered open space, and the areas covered by the architectural projections were not counted as Floor Area.

Another City precedent excluding architectural projections from being considered Floor Area is The Roy at Overland project (Case Number DIR-2014-DB-SPR). The Roy at Overland project incorporates an architectural projection/trellis feature which covers almost half of the rooftop deck. See attached **Exhibit F**. This deck is called out in the open space plan as Common Open Space. The trellis is not discussed, nor is any portion of this deck counted as Floor Area. See attached **Exhibit G**. Another example of the City excluding covered Common Open Space from being considered Floor Area is the 1400 Figueroa project (Case Number DIR-2014-1580-TDR-SPR). For this project, the City approved an architectural projection that covers a portion of the roof deck. According to the open space plan, the entire roof deck is counted as Common Open Space. There is no exclusion of the covered portion from the credited Common Open Space. See attached **Exhibit H**.

Taken together, the City has recently approved several projects that have architectural projections in credited Common Open Space areas, thus providing Common Open Space credit to valid recreational open space despite being partially covered. Importantly, the City has also excluded covered Common Open Space from being considered Floor Area.

Even though there are a number of precedents where the City has not classified area below architectural projections as Floor Area, and where the City has given exterior Common Open Space credit for covered Common Open Space, there are also a number of other projects that have received explicit entitlement approval to permit the area within covered Common Open Space to be discounted from the Floor Area calculation. These projects include the Figueroa Central project (Case Number DIR-2014-3673-SPPA). For this project, the City approved a Specific Plan Project Permit Adjustment to permit the area under the (a) cantilevered hotel pool deck and (b) residential pool deck several stories above the hotel pool deck to not count toward the building's Floor Area. See attached **Exhibit I**. This project's letter of determination states that "[a] Portion of the building is permitted to project from the façade of the main building to the property line on Figueroa Street, as shown on Exhibit A. A cantilevered hotel pool deck will project over the private setback at a height of 80 feet; this hotel pool deck will not contain floor area and only contains open space." For the Wilshire & Crescent Heights project (Case Number ZA-2008-4140), the City approved a Zoning Administrator's Adjustment to permit covered outdoor Common Open Space area located on the fifth floor podium level rooftop amenity area to be excluded in the calculation of Floor Area. See **Exhibit J**.

The Applicant believes an interpretation is necessary from the Zoning Administrator to resolve the inconsistent treatment applied to Floor Area as it relates to Common Open Space, as well as an interpretation that Common Open Space credit be provided to the building cutouts despite being partially covered, because they are fully open to the sky on two sides. The recently-

adopted revisions to the Downtown Design Guide state that determinations of open space and Floor Area should be implemented in a manner that maximizes opportunities for resident and public-serving open space, such as on rooftops, balconies, and building cutout areas, taking into account limitations on developable space that constrain many downtown development projects (Downtown Design Guide, at Page 7.) Moreover, similar to the ZAI relating to balconies, the Office of Zoning Administration could ensure that the Projects' covered open space cutout areas are maintained as open space through the recordation of an appropriate "Covenant and Agreement Regarding Maintenance of Building."

V. THE PROJECT'S BUILDING CUTOUTS SHOULD BE CONSIDERED "RECREATION ROOMS" IF THEY ARE NOT DEFINED AS COMMON OPEN SPACE

If the City does not grant exterior Common Open Space credit to the Project for its building cutouts, an additional Zoning Administrator Interpretation is requested to confirm that the building cutouts may alternatively qualify as "recreation rooms" under LAMC § 12.21-G.2(a)(4)(i). This interpretation would enable the cutout areas to receive some Open Space credit. LAMC § 12.21-G.2(a)(4)(i) states "Recreation rooms at least 600 square feet in area for a development of 16 or more dwelling units, or at least 400 square feet in area for a development of fewer than 16 dwelling units, may qualify as common open space, but shall not qualify for more than 25 percent of the total required usable open space."

The LAMC does not have definitions for the words "Recreation Room" or "Room," and therefore there are no constraints in the LAMC for adopting the reasonable interpretation that the Project's open space cutouts can be considered a "recreation room" that can count toward a portion of the Project's open space requirement under LAMC § 12.21-G.2(a)(4)(i) if such spaces are found by the Planning Department to not meet the LAMC definition of Common Open Space independently. There is no strong justification for the exclusion of building cutouts from being credited as Common Open Space since such areas satisfy recreational needs. The Project demonstrates the attractiveness of covered Common Open Space that satisfies the recreational needs of residents. See Exhibit A. Such an interpretation would be in line with General Plan policy promoting the creation of ample open space for residents and would not penalize, but would rather credit the Project for a creative solution to providing recreational open space to meet the open space requirement within the limited footprint of the Project Site.

VI. CONCLUSION

The requested Zoning Administrator Interpretations are needed to ensure that the Project's wrap around balconies and building cutouts, are not counted toward the Project's Floor Area limitation in line with City policy and prior ZAIs, and that Common Open Space credit may be received for building cutout areas. In the alternative, if Common Open Space is denied to building cutout areas, the areas should receive Common Open Space credit as Recreation Rooms. Such interpretations would promote General Plan policy in favor of supporting open space in a high rise downtown Project in line with existing City precedent, while at the same time supporting innovative design that will beautify and enable a striking new addition to the downtown skyline.

Alexander Irvine

From: Luciralia Ibarra <Luciralia.ibarra@lacity.org>
Sent: Wednesday, August 30, 2017 1:24 PM
To: Ryan M. Leaderman
Cc: Charlie Rausch (Charlie.rausch@lacity.org); Andrew J. Brady; Alexander Irvine; Tim Moran
Subject: Re: ZAI Filing for Balconies and Building Cutouts

Hi Ryan,

This email is to confirm that Major Projects is amenable to the ZAI filing with the pertinent information filled out for the ZAI request, no appointment is necessary as we have discussed the approach to the ZAI and minimal materials are warranted, routing to Charlie Rausch is correct, and I'll defer to Counter staff as to the appropriate fee.

-Luci

On Tue, Aug 29, 2017 at 12:00 PM, Ryan M. Leaderman <rleaderman@linerlaw.com> wrote:

Hi Luci,

For the ZAI application related to wrap around balconies and building cutouts, we are ready to file it.

So as to head off any issues with the Counter staff, please confirm the following:

- We should use the DCPA form, but we only need to partially fill it out with pertinent info because there is no project, the only action is to request the issuance of a ZAI.
- We can file at the Planning Counter without an appointment.
- The application and attachments should be routed to Charlie Rausch.
- The fee would be as calculated in the attached fee estimate: \$7,055.51 (see attached).

Thanks much. Please let us know if you have any questions.

Best,

Ryan



Ryan M. Leaderman, Esq.

rleaderman@linerlaw.com

[213.694.3115](tel:213.694.3115) direct

[310.804.4523](tel:310.804.4523) cell

[213.694.3101](tel:213.694.3101) fax

633 West 5th Street | Suite 3200

Los Angeles, CA 90071-2005

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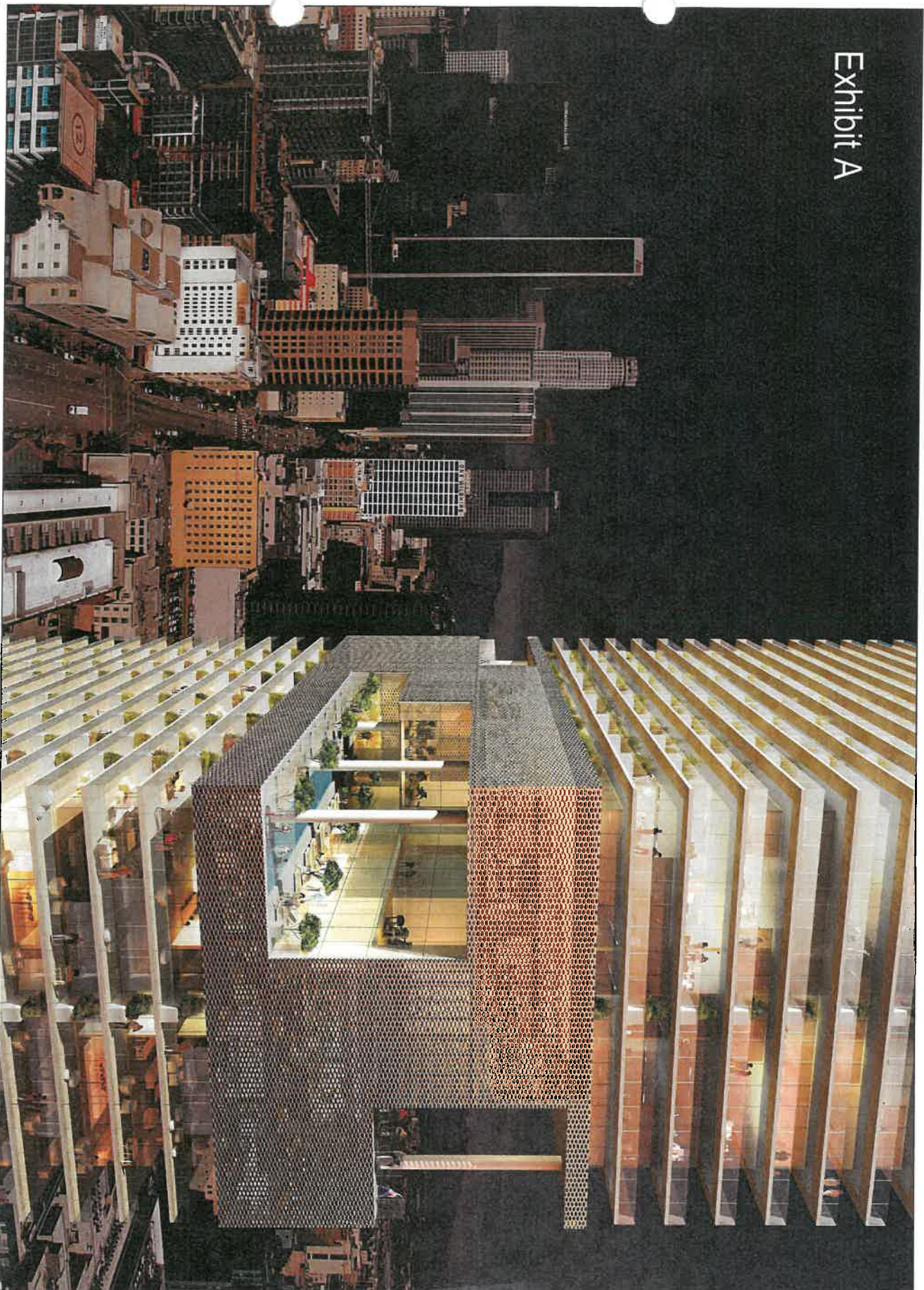
Privileged and Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or Responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer does not consent to internet email for messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of my firm shall be understood as neither given nor endorsed by it.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



Luciralia Ibarra, Senior City Planner
Department of City Planning
Major Projects
(213) 978-1378
200 N. Spring St., 7th Floor, Room 750
Los Angeles, CA. 90012

Exhibit A



OSVA
NEW YORK

110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.OSVA.COM

NO.	DATE	DESCRIPTION
1	10/15/2023	ISSUED FOR PERMITTING
2	11/01/2023	REVISED PER PERMITTING
3	11/15/2023	REVISED PER PERMITTING
4	12/01/2023	REVISED PER PERMITTING
5	12/15/2023	REVISED PER PERMITTING
6	01/01/2024	REVISED PER PERMITTING
7	01/15/2024	REVISED PER PERMITTING
8	02/01/2024	REVISED PER PERMITTING
9	02/15/2024	REVISED PER PERMITTING
10	03/01/2024	REVISED PER PERMITTING
11	03/15/2024	REVISED PER PERMITTING
12	04/01/2024	REVISED PER PERMITTING
13	04/15/2024	REVISED PER PERMITTING
14	05/01/2024	REVISED PER PERMITTING
15	05/15/2024	REVISED PER PERMITTING
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18	07/01/2024	REVISED PER PERMITTING
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28	12/01/2024	REVISED PER PERMITTING
29	12/15/2024	REVISED PER PERMITTING
30	01/01/2025	REVISED PER PERMITTING

OWNER/APPLICANT

1045 OLIVE LLC
1045 OLIVE BLVD
NEW YORK, NY 10011

CONSULTANTS

ARCHITECT OF RECORD:
OSVA ARCHITECTS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.OSVA.COM

MECHANICAL ENGINEER:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

ELECTRICAL ENGINEER:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

PLUMBING ENGINEER:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

STRUCTURAL ENGINEER:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

ENVIRONMENTAL ENGINEER:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

LANDSCAPE ARCHITECT:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

INTERIOR ARCHITECT:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

GENERAL CONTRACTOR:
MERRILL JACOBSON ENGINEERS
110 WEST 11TH STREET
NEW YORK, NY 10011
TEL: 212 692 1234
WWW.MJE.COM

KEY PLAN

1045 OLIVE BLVD
NEW YORK, NY 10011



11TH STREET
OLIVE STREET

1045 OLIVE

NEW CONSTRUCTION

PROJECT NO: 1045
SCALE: AS SHOWN

A-303

DATE: 10/15/2023

OWNER/ARCHITECT

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011

CONSULTANTS

ARCHITECT/ENGINEER
300 W. WASHINGTON ST. #10
NEW YORK, NY 10014

STRUCTURAL ENGINEER
100 W. WASHINGTON ST. #10
NEW YORK, NY 10014

MECHANICAL/ELECTRICAL/PLUMBING ENGINEER
100 W. WASHINGTON ST. #10
NEW YORK, NY 10014

MECHANICAL/ELECTRICAL/PLUMBING ENGINEER
100 W. WASHINGTON ST. #10
NEW YORK, NY 10014

MECHANICAL/ELECTRICAL/PLUMBING ENGINEER
100 W. WASHINGTON ST. #10
NEW YORK, NY 10014

KEY PLAN

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011

NEW CONSTRUCTION

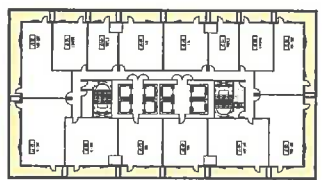
1045 OLIVE

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011

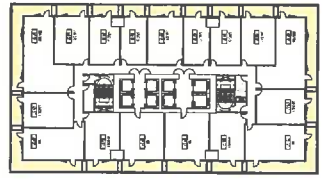
OPEN SPACE DIAGRAMS

A-005

DATE: 08.27.12



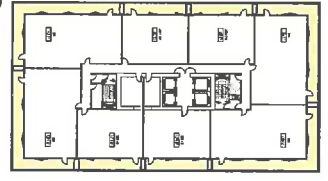
5 LEVEL 5
SCALE: 1/2" = 1'-0"
PRIVATE COMMON SPACE: 2794 SF
QUALIFIED AS PRIVATE OPEN SPACE FLOOR: 14,100 SF + 400 SF
3 FLOORS X 400 SF = 1,200 SF TOTAL



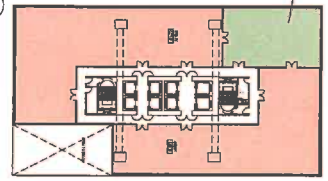
4 LEVEL 4
SCALE: 1/2" = 1'-0"
PRIVATE COMMON SPACE: 2742 SF
QUALIFIED AS PRIVATE OPEN SPACE FLOOR: 11,740 SF + 400 SF
18 FLOORS X 400 SF = 7,200 SF TOTAL



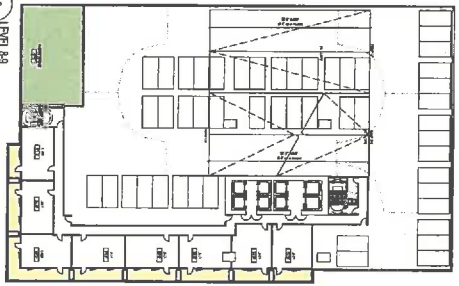
10 ROOF
SCALE: 1/2" = 1'-0"
EXTENSION COMMON OPEN SPACE: 11,948 SF



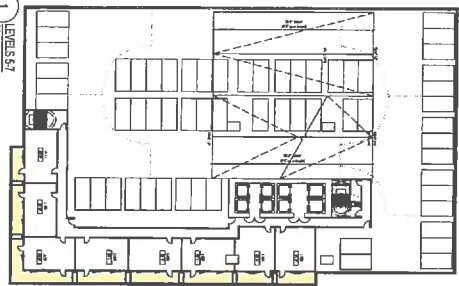
9 LEVEL 9
SCALE: 1/2" = 1'-0"
PRIVATE COMMON SPACE: 3,107 SF
QUALIFIED AS PRIVATE OPEN SPACE FLOOR: 8,156 SF + 400 SF
18 FLOORS X 400 SF = 7,200 SF TOTAL



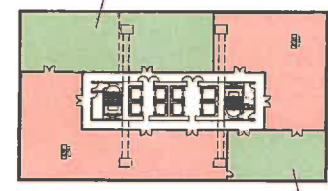
8 LEVEL 8
SCALE: 1/2" = 1'-0"
PRIVATE COMMON SPACE: 3,107 SF
EXTENSION COMMON OPEN SPACE: 1,014 SF



3 LEVEL 3
SCALE: 1/2" = 1'-0"
PRIVATE COMMON SPACE: 1,041 SF
QUALIFIED AS PRIVATE OPEN SPACE FLOOR: 8,156 SF + 400 SF
2 FLOORS X 400 SF = 800 SF TOTAL



2 LEVEL 2
SCALE: 1/2" = 1'-0"
PRIVATE COMMON SPACE: 1,041 SF
QUALIFIED AS PRIVATE OPEN SPACE FLOOR: 8,156 SF + 400 SF
3 FLOORS X 400 SF = 1,200 SF TOTAL



1 LEVEL 1
SCALE: 1/2" = 1'-0"
INTERIOR COMMON OPEN SPACE: 1,008 SF
EXTENSION COMMON OPEN SPACE: 1,014 SF

Exhibit B

COMMON SPACE REQUIREMENTS

DATE: 08.27.12

COMMON OPEN SPACE: 100% OF GROSS COMMON OPEN SPACE

1. RESERVATION FLOOR AT LEAST 10% OF GROSS COMMON OPEN SPACE

2. PRIVATE COMMON SPACE: 1.0% OF GROSS COMMON OPEN SPACE

3. PRIVATE COMMON SPACE: 1.0% OF GROSS COMMON OPEN SPACE

UNITS AND OPEN SPACE REQUIRED PER LAW: 12.17 (b)

UNIT TYPE	UNIT COUNT	SF PER UNIT	AREA
1 BR	20	100	2,000 SF
2 BR	175	175	30,625 SF
3 BR	67	175	11,725 SF
TOTAL	262	175	44,350 SF

COMMON OPEN SPACE PROVIDED:

FLOOR	AREA
1ST FLOOR	1,008 SF
2ND FLOOR	1,041 SF
3RD FLOOR	1,041 SF
4TH FLOOR	1,041 SF
5TH FLOOR	1,041 SF
6TH FLOOR	1,041 SF
7TH FLOOR	1,041 SF
8TH FLOOR	1,041 SF
9TH FLOOR	1,041 SF
10TH FLOOR	1,041 SF
TOTAL	10,410 SF

COMMON OPEN SPACE DISTRIBUTION

UNITS WITHIN 25 FT OF COMMON OPEN SPACE	UNIT COUNT	SF PER UNIT	AREA
UNITS WITHIN 25 FT OF COMMON OPEN SPACE	20	100	2,000 SF
UNITS WITHIN 25 FT OF COMMON OPEN SPACE	175	175	30,625 SF
UNITS WITHIN 25 FT OF COMMON OPEN SPACE	67	175	11,725 SF
TOTAL	262	175	44,350 SF

COMMON OPEN SPACE PROVIDED:

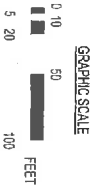
FLOOR	AREA
1ST FLOOR	1,008 SF
2ND FLOOR	1,041 SF
3RD FLOOR	1,041 SF
4TH FLOOR	1,041 SF
5TH FLOOR	1,041 SF
6TH FLOOR	1,041 SF
7TH FLOOR	1,041 SF
8TH FLOOR	1,041 SF
9TH FLOOR	1,041 SF
10TH FLOOR	1,041 SF
TOTAL	10,410 SF

LANDSCAPING AND EXTERIOR COMMON SPACE

1045 OLIVE

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011

1045 OLIVE
1045 OLIVE
NEW YORK, NY 10011



FIGUEROA CENTRAL - PROJECT SUMMARY

PROJECT: 1101 S Flower Street, Los Angeles, CA 90071
CLIENT: AN ARCADIS COMPANY
DATE: 01/15/2014
PROJECT NO.: 2014-3673
PROJECT ADDRESS: 1101 S Flower Street, Los Angeles, CA 90071
PROJECT TYPE: COMMERCIAL/RESIDENTIAL
PROJECT STATUS: PRELIMINARY DESIGN
PROJECT DESCRIPTION: A 10-story, 1.2 million square foot mixed-use development consisting of 1,200 residential units, 100,000 square feet of retail space, and 100,000 square feet of office space. The project is located on a 10-acre site bounded by Figueroa Street to the north, Flower Street to the south, and 11th Street to the east and west. The site is currently vacant and is zoned C-2 (Community Center). The project is being developed by AN Arcadis Company, a joint venture of AN Arcadis and Arcadis U.S. The project is being financed by a combination of equity and debt financing. The project is expected to be completed in 2018.

NO.	DESCRIPTION	UNIT	AMOUNT	TOTAL
1	RESIDENTIAL UNITS	1,200	1,200	1,200
2	OFFICE SPACE	100,000	100,000	100,000
3	RETAIL SPACE	100,000	100,000	100,000
4	PARKING SPACES	1,200	1,200	1,200
5	LANDSCAPING	100,000	100,000	100,000
6	UTILITIES	100,000	100,000	100,000
7	CONSTRUCTION	100,000	100,000	100,000
8	OPERATION & MAINTENANCE	100,000	100,000	100,000
9	REPAIR & REPLACEMENT	100,000	100,000	100,000
10	RENOVATION	100,000	100,000	100,000
11	DEMOLITION	100,000	100,000	100,000
12	LAND ACQUISITION	100,000	100,000	100,000
13	PERMITS	100,000	100,000	100,000
14	INSURANCE	100,000	100,000	100,000
15	LEGAL FEES	100,000	100,000	100,000
16	ARCHITECTURAL FEES	100,000	100,000	100,000
17	ENGINEERING FEES	100,000	100,000	100,000
18	LANDSCAPING FEES	100,000	100,000	100,000
19	UTILITIES FEES	100,000	100,000	100,000
20	CONSTRUCTION FEES	100,000	100,000	100,000
21	OPERATION & MAINTENANCE FEES	100,000	100,000	100,000
22	REPAIR & REPLACEMENT FEES	100,000	100,000	100,000
23	RENOVATION FEES	100,000	100,000	100,000
24	DEMOLITION FEES	100,000	100,000	100,000
25	LAND ACQUISITION FEES	100,000	100,000	100,000
26	PERMITS FEES	100,000	100,000	100,000
27	INSURANCE FEES	100,000	100,000	100,000
28	LEGAL FEES	100,000	100,000	100,000
29	ARCHITECTURAL FEES	100,000	100,000	100,000
30	ENGINEERING FEES	100,000	100,000	100,000
31	LANDSCAPING FEES	100,000	100,000	100,000
32	UTILITIES FEES	100,000	100,000	100,000
33	CONSTRUCTION FEES	100,000	100,000	100,000
34	OPERATION & MAINTENANCE FEES	100,000	100,000	100,000
35	REPAIR & REPLACEMENT FEES	100,000	100,000	100,000
36	RENOVATION FEES	100,000	100,000	100,000
37	DEMOLITION FEES	100,000	100,000	100,000
38	LAND ACQUISITION FEES	100,000	100,000	100,000
39	PERMITS FEES	100,000	100,000	100,000
40	INSURANCE FEES	100,000	100,000	100,000
41	LEGAL FEES	100,000	100,000	100,000
42	ARCHITECTURAL FEES	100,000	100,000	100,000
43	ENGINEERING FEES	100,000	100,000	100,000
44	LANDSCAPING FEES	100,000	100,000	100,000
45	UTILITIES FEES	100,000	100,000	100,000
46	CONSTRUCTION FEES	100,000	100,000	100,000
47	OPERATION & MAINTENANCE FEES	100,000	100,000	100,000
48	REPAIR & REPLACEMENT FEES	100,000	100,000	100,000
49	RENOVATION FEES	100,000	100,000	100,000
50	DEMOLITION FEES	100,000	100,000	100,000

NO.	DESCRIPTION	UNIT	AMOUNT	TOTAL
1	RESIDENTIAL UNITS	1,200	1,200	1,200
2	OFFICE SPACE	100,000	100,000	100,000
3	RETAIL SPACE	100,000	100,000	100,000
4	PARKING SPACES	1,200	1,200	1,200
5	LANDSCAPING	100,000	100,000	100,000
6	UTILITIES	100,000	100,000	100,000
7	CONSTRUCTION	100,000	100,000	100,000
8	OPERATION & MAINTENANCE	100,000	100,000	100,000
9	REPAIR & REPLACEMENT	100,000	100,000	100,000
10	RENOVATION	100,000	100,000	100,000
11	DEMOLITION	100,000	100,000	100,000
12	LAND ACQUISITION	100,000	100,000	100,000
13	PERMITS	100,000	100,000	100,000
14	INSURANCE	100,000	100,000	100,000
15	LEGAL FEES	100,000	100,000	100,000
16	ARCHITECTURAL FEES	100,000	100,000	100,000
17	ENGINEERING FEES	100,000	100,000	100,000
18	LANDSCAPING FEES	100,000	100,000	100,000
19	UTILITIES FEES	100,000	100,000	100,000
20	CONSTRUCTION FEES	100,000	100,000	100,000
21	OPERATION & MAINTENANCE FEES	100,000	100,000	100,000
22	REPAIR & REPLACEMENT FEES	100,000	100,000	100,000
23	RENOVATION FEES	100,000	100,000	100,000
24	DEMOLITION FEES	100,000	100,000	100,000
25	LAND ACQUISITION FEES	100,000	100,000	100,000
26	PERMITS FEES	100,000	100,000	100,000
27	INSURANCE FEES	100,000	100,000	100,000
28	LEGAL FEES	100,000	100,000	100,000
29	ARCHITECTURAL FEES	100,000	100,000	100,000
30	ENGINEERING FEES	100,000	100,000	100,000
31	LANDSCAPING FEES	100,000	100,000	100,000
32	UTILITIES FEES	100,000	100,000	100,000
33	CONSTRUCTION FEES	100,000	100,000	100,000
34	OPERATION & MAINTENANCE FEES	100,000	100,000	100,000
35	REPAIR & REPLACEMENT FEES	100,000	100,000	100,000
36	RENOVATION FEES	100,000	100,000	100,000
37	DEMOLITION FEES	100,000	100,000	100,000
38	LAND ACQUISITION FEES	100,000	100,000	100,000
39	PERMITS FEES	100,000	100,000	100,000
40	INSURANCE FEES	100,000	100,000	100,000
41	LEGAL FEES	100,000	100,000	100,000
42	ARCHITECTURAL FEES	100,000	100,000	100,000
43	ENGINEERING FEES	100,000	100,000	100,000
44	LANDSCAPING FEES	100,000	100,000	100,000
45	UTILITIES FEES	100,000	100,000	100,000
46	CONSTRUCTION FEES	100,000	100,000	100,000
47	OPERATION & MAINTENANCE FEES	100,000	100,000	100,000
48	REPAIR & REPLACEMENT FEES	100,000	100,000	100,000
49	RENOVATION FEES	100,000	100,000	100,000
50	DEMOLITION FEES	100,000	100,000	100,000

FIGUEROA CENTRAL
 1101 S FLOWER ST, LOS ANGELES, CA 90071

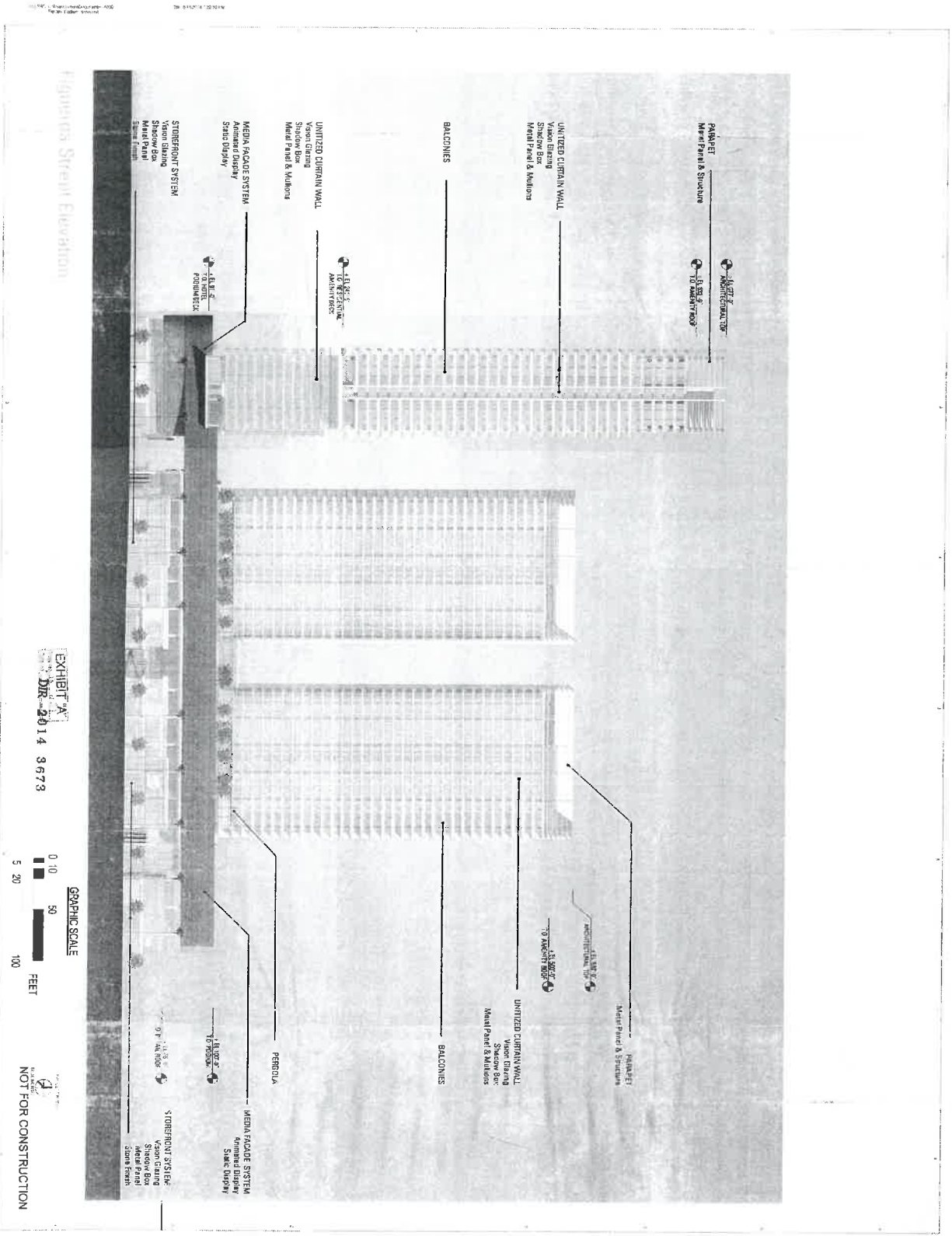
AN ARCADIS COMPANY
 AN ARCADIS COMPANY
 1101 S FLOWER ST
 LOS ANGELES, CA 90071
 TEL: 213.477.1101
 WWW.ARCADIS.COM

PROJECT NO.: 2014-3673
DATE: 01/15/2014
PROJECT ADDRESS: 1101 S Flower Street, Los Angeles, CA 90071
PROJECT TYPE: COMMERCIAL/RESIDENTIAL
PROJECT STATUS: PRELIMINARY DESIGN

GRAPHIC SCALE
 0 10 50 100 FEET

NOT FOR CONSTRUCTION

DIR 2014-3673



Figueroa Street Elevation

EXHIBIT A
DIR-2014-3673

GRAPHIC SCALE
0 10 50 100
FEET

NOT FOR CONSTRUCTION

A-0.24

ANALYSIS

NO.	DESCRIPTION	DATE	BY	CHKD.
1	PRELIMINARY	11/11/14
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FIGUEROA CENTRAL
1101 S FLOWER ST, LOS ANGELES, CA 90071

RTKL
AN ARCADIS COMPANY

PROJECT
1101 S FLOWER ST
LOS ANGELES, CA
ARCHITECTURAL ELEVATION
PROJECT NUMBER: 01003

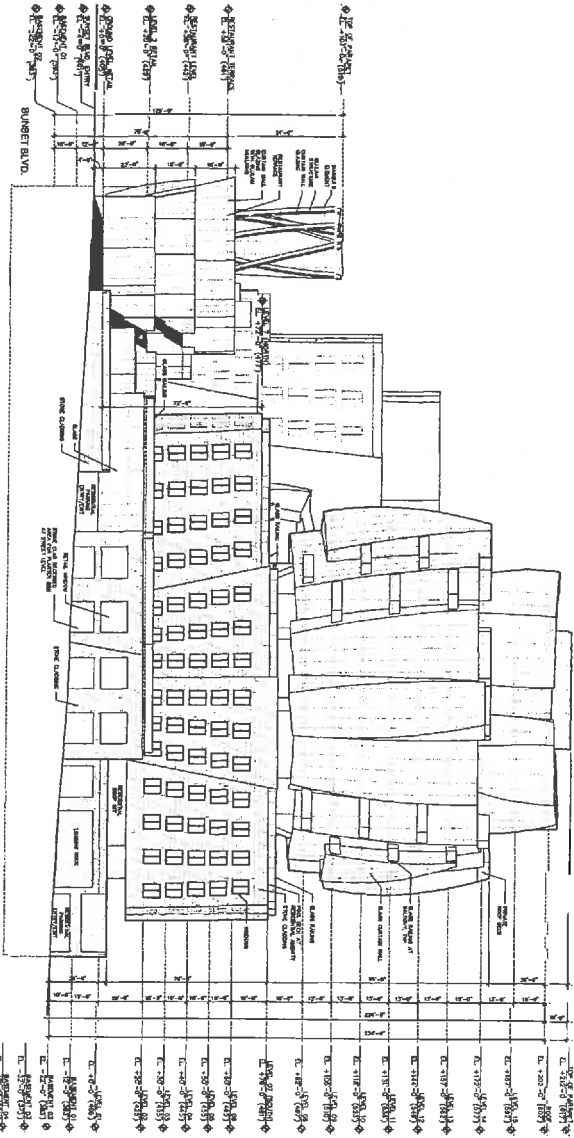
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DRAWN BY: [Name]
CHECKED BY: [Name]
SCALE: AS SHOWN

EXHIBIT "A"

Page No. 25 of 55

Case No. CR-101-1571-104-00-50L

Exhibit D



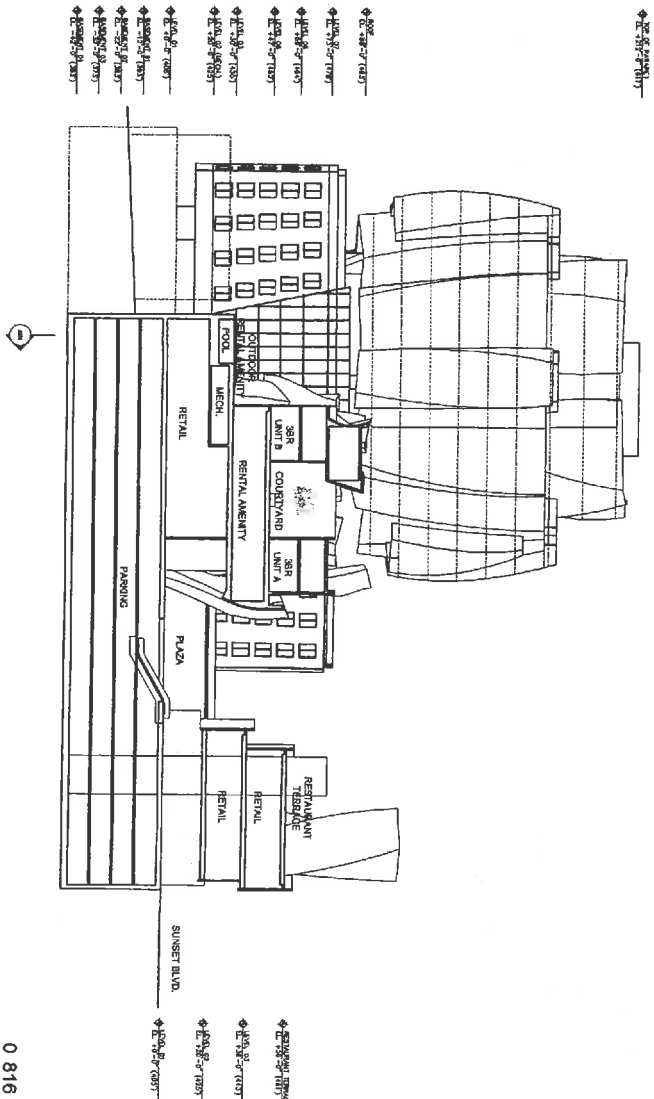
GEHRY PARTNERS, LLP

8150 SUNSET

ENVIRONMENTAL IMPACT REPORT
ALTERNATIVE B
WEST ELEVATION

DATE: 11/11/11
SCALE: 1/8" = 1'-0"
PROJECT: 8150 SUNSET
SHEET: A120

Exhibit D



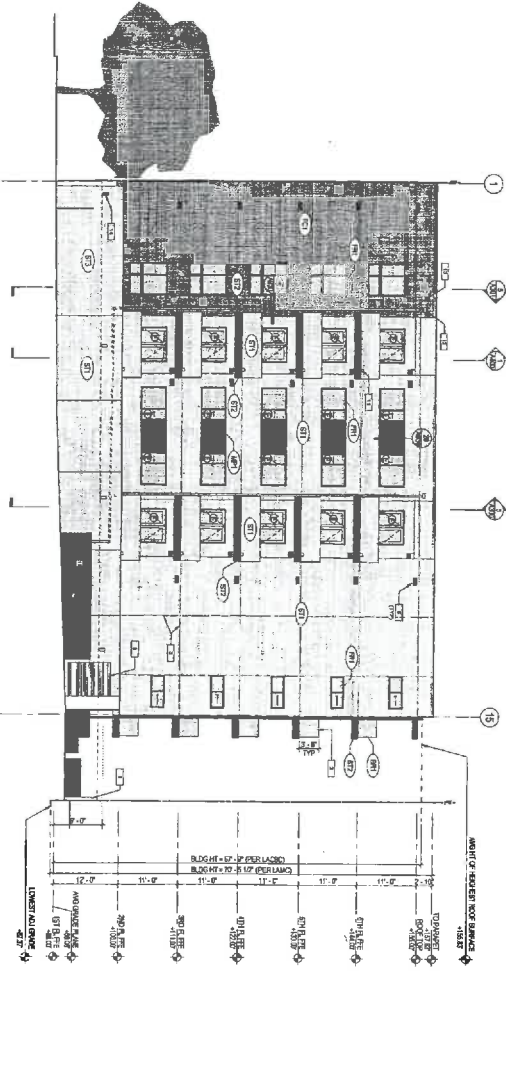
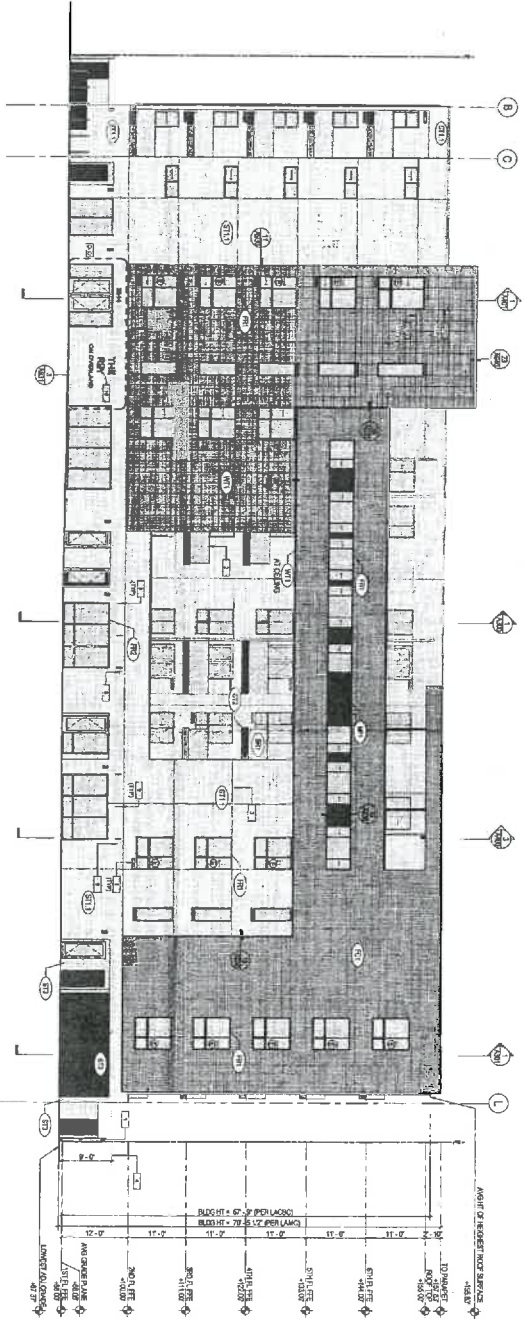
8150 SUNSET
 ENVIRONMENTAL IMPACT REPORT
 SECTION LOCUS WEST

GEHRY/PARTNERS, LLP
 ARCHITECT
 1000 AVENUE OF THE STARS
 LOS ANGELES, CALIFORNIA 90064
 (310) 422-3000

0 816 32 64

A 125

Exhibit F



NOTES

1. 8" x 16" H&V FRACTIONAL CHALK LINE
2. WALL
3. FLOORING
4. FLOOR CONTROL CHECKS SEE DET.
5. FLOOR FINISH SEE DET.
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15. FLOOR FINISH SEE DET.

DATE: 11/13/2016
 13 of 21

SHEET NOTES

1. SEE THE ARCHITECT'S GENERAL NOTES FOR INFORMATION

LEGEND

- 1. FLOOR FINISH, 2" X 8" S&W FLOOR
- 2. FLOOR FINISH, SMOOTH TROWEL
- 3. MASTER FINISH, 2" X 8" S&W FLOOR
- 4. MASTER FINISH, SMOOTH TROWEL
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THE ROY @ OVERLAND

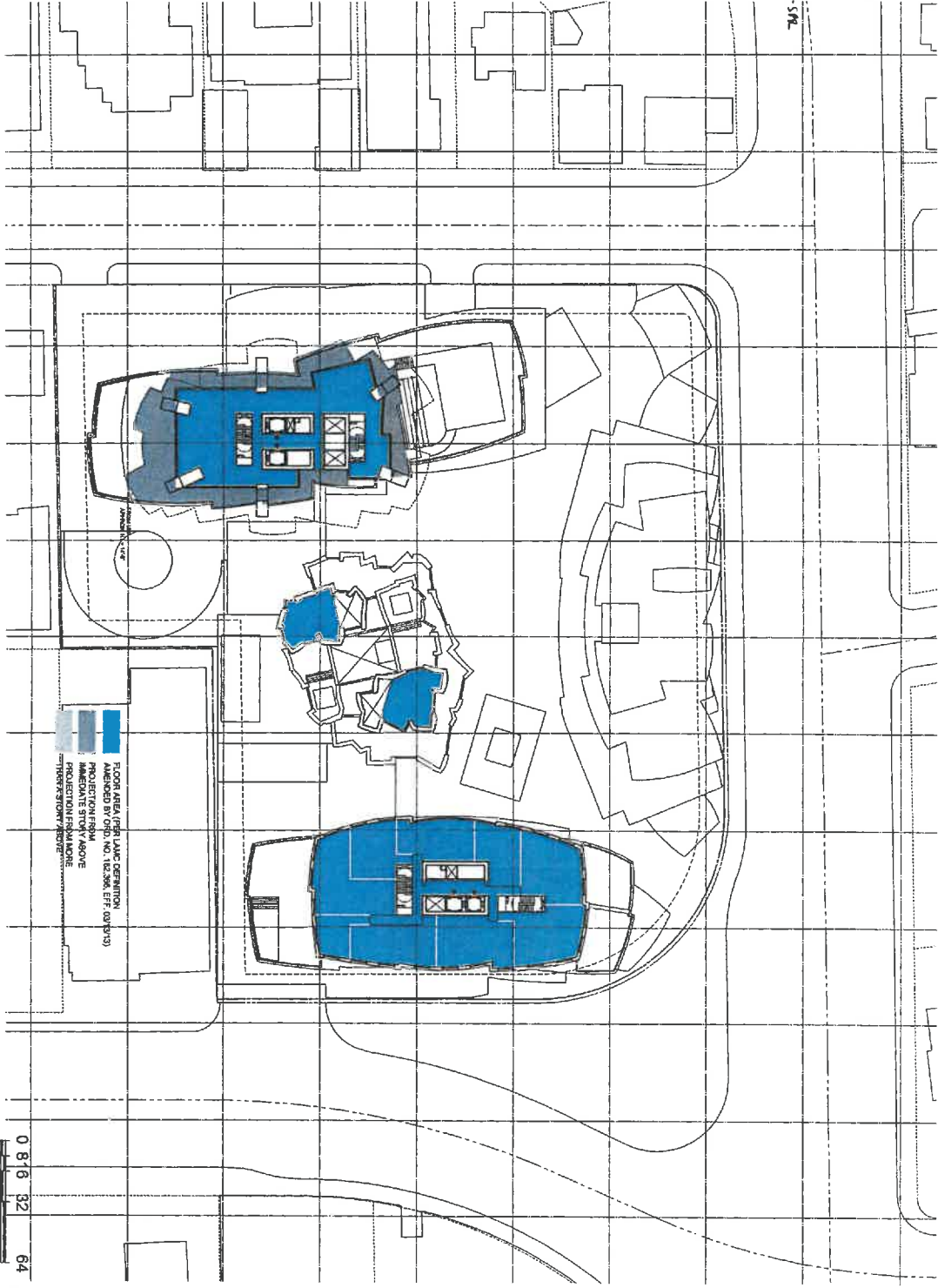
3544 - 3558 OVERLAND AVE.
 LOS ANGELES, CA 90034



DATE: 11/13/2016
 13 of 21

A200

Exhibit G



GEHRYPARTNERS, LLP
 ARCHITECT
 12941 BEATRICE STREET
 SUITE 1000
 SAN FRANCISCO, CALIFORNIA 94028
 (415) 460-5500

8150 SUNSET
 AIRBORNE FILM COMPANY CAMPUS

ALTERNATIVE 9
 FLOOR AREA DIAGRAM
 LEVEL 07 FLOOR PLAN

DATE
 2018-05-13

SK-0124-7

D/



Exhibit H

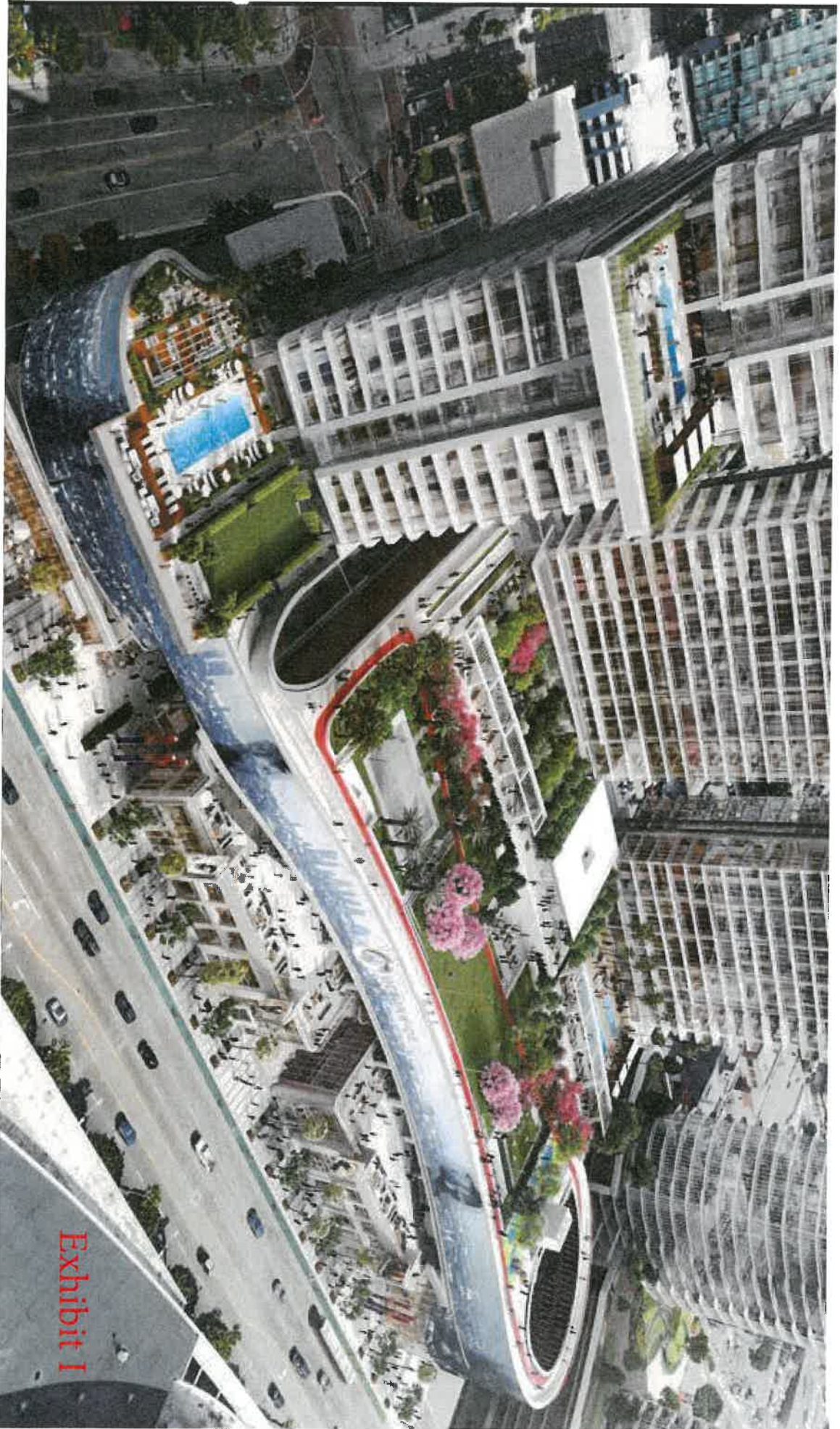
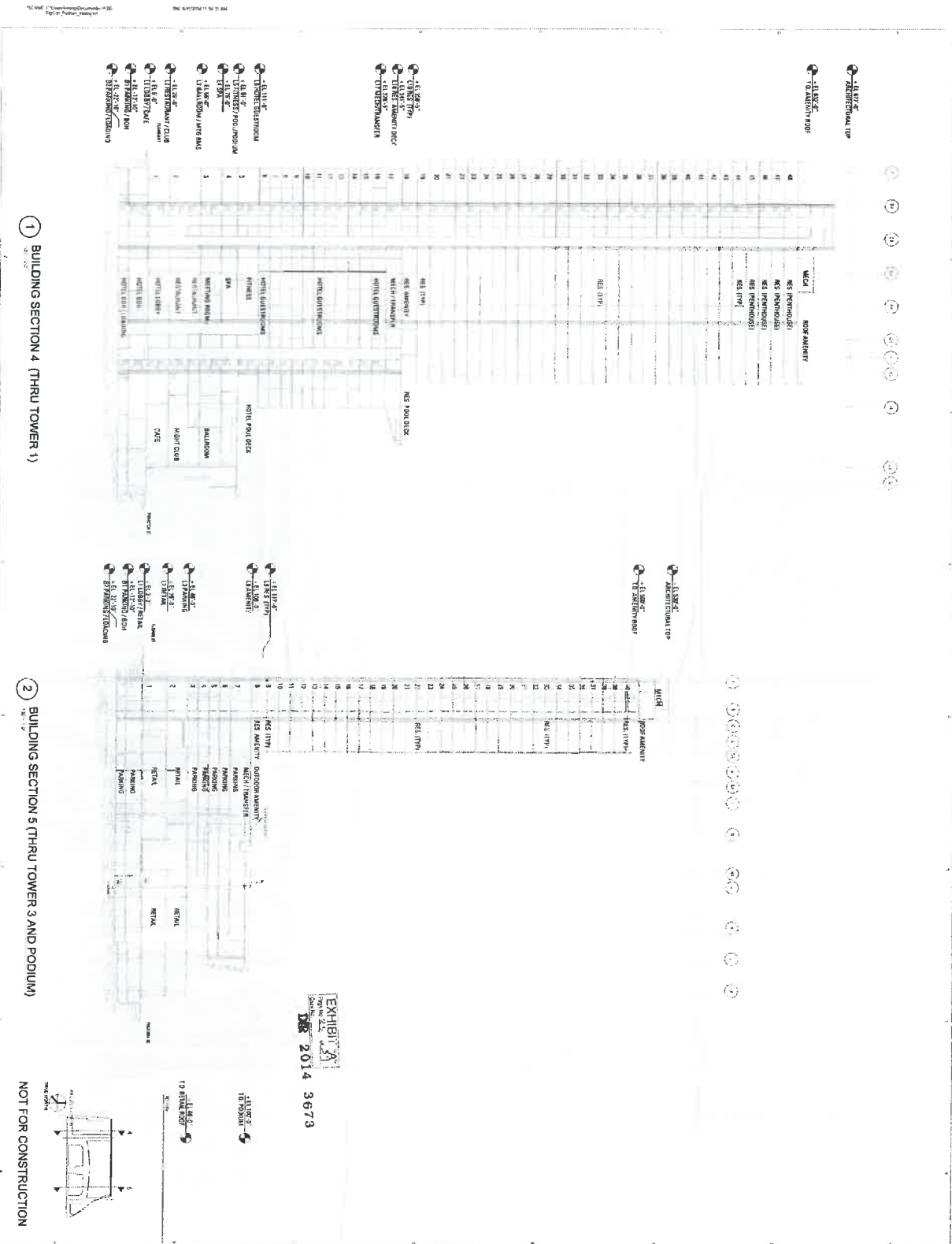


Exhibit I

Exhibit I



FIGUEROA CENTRAL
1101 S FLOWER ST, LOS ANGELES, CA 90071

AN ARCADIS COMPANY
RTKL

A-0.30
OVERALL BUILDING SECTION

DIR 2014-3673

NOT FOR CONSTRUCTION

Exhibit I

DEPARTMENT OF CITY PLANNING

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT
RENEE DAKE WILSON
VICE-PRESIDENT

ROBERT L. AHN
MARIA CABILDO
CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
DANA M. PERLMAN
MARTA SEGURA

JAMES K. WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300

CITY OF LOS ANGELES CALIFORNIA



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

MICHAEL J. LOGRANDE
DIRECTOR
(213) 978-1271

ALAN BELL, AICP
DEPUTY DIRECTOR
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
www.planning.lacity.org

LOS ANGELES SPORTS AND ENTERTAINMENT DISTRICT SPECIFIC PLAN PROJECT PERMIT COMPLIANCE MODIFICATION PROJECT PERMIT ADJUSTMENT

January 16, 2015

Applicant / Owner

Song Feng
Tohigh Construction Investment, LLC
865 South Figueroa Street
Suite 3150
Los Angeles, CA 90017

Representative

David A. Goldberg
Armbruster Goldsmith & Delvac, LLP
11611 San Vicente Boulevard
Suite 900
Los Angeles, CA 90049

**CASE NO. DIR-2005-7453-SPP-SPPA-M3, DIR-2014-3673-SPPA
MODIFICATION TO SPECIFIC PLAN PROJECT
PERMIT COMPLIANCE
SPECIFIC PLAN PROJECT PERMIT ADJUSTMENT
CEQA: ENV-2000-3577-EIR & Addendum
Related Case: VTT-69414
Location: 1101 South Flower Street
Council District: 14 – Huizar
Plan Area: Central City Community Plan
Specific Plan: Los Angeles Sports and Entertainment
District
Land Use: High Density Residential, Regional Center
Commercial
Zone: LASED
District Map: 127-5A207
Legal Description: Tract No. 53384-C**

Last Day to File an Appeal: February 2, 2015

DETERMINATION

Pursuant to Los Angeles Municipal Code Section 11.5.7 and the Los Angeles Sports and Entertainment District Specific Plan (LASED), (Ordinance No. 174,225, amended by Ordinance No. 181,334), as the designee of the Director of Planning, I hereby:

Exhibit I

Approve with Conditions a Modification to a Specific Plan Project Permit Compliance Review to allow the construction of a 1,488,101 square foot mixed-use development with three towers: the North Tower will be built at 632 feet in height with a 45-foot spire, the South Tower will be built at 500 feet in height with a 30 foot spire, and the New South Tower will be built at 500 feet in height with a 30 foot spire. The project includes 504 residential units, 183 hotel rooms with ancillary retail, restaurant and entertainment uses, and 166,583 square feet of retail space. The North Tower will include 164 units and both South Towers will each include 170 units. The project will provide 1,464 parking spaces within two subterranean parking levels and five above grade levels.

Approve with Conditions Specific Plan Project Permit Adjustments from Section 10.A.4 of the LASED Specific Plan to increase the upper limit of the 160 to 455 -foot Tower Height Zone by less than 10% to 500 feet and to permit a height of up to 632 feet for the North Tower, which constitutes a less than 10% increase to the permitted maximum height of 575 feet.

Find that the previously adopted **Environmental Impact Report, ENV-2000-3577-EIR**, certified on September 4, 2001 and subsequently adopted Addenda to the Final Environmental Impact Report, together with the Addendum, as the project's environmental clearance pursuant to the California Environmental Quality Act and Section 21082.1(c)(3) of the California Public Resources Code is adequate environmental clearance and complies with the California Environmental Quality Act.

The project approval is based upon the attached Findings, and subject to the attached Conditions of Approval.

Exhibit I

CONDITIONS OF APPROVAL

SPECIFIC PLAN COMPLIANCE CONDITIONS

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, Plan Implementation Division, 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, the project conditions, or the project permit authorization.
2. **Use and Floor Area.** The subject site shall be limited to a maximum of 504 residential dwelling units within 1,038,171 square feet of floor area; 166,583 square feet of floor area of retail/restaurant use on the ground floor; a maximum of 183 hotel rooms and ancillary hotel space including a health club/spa, nightclub, restaurants and retail, within 283,347 square feet of floor area. The project shall contain a total maximum of 1,488,101 square feet of floor area.
3. **Height.** The North Tower shall not exceed a height of 632 feet plus a 45-foot spire. The South Tower shall not exceed a height of 500 feet plus a 30-foot spire. The New South Tower shall not exceed a height of 500 feet plus a 30-foot spire. All heights shall be measured according to the "Height, Tower" definition contained in the Specific Plan. Any structures on the roof, such as air conditioning units and other equipment shall be fully screened from view of any abutting properties. The podium portion of the building shall not exceed a height of 100 feet which shall be measured according to the "Height, Podium" definition contained in the Specific Plan.
4. **Parking.** The project shall provide a minimum of 1.25 parking spaces per dwelling unit for a minimum of 630 parking spaces for the residential uses. The project shall provide 1 parking space for each 1,000 square feet of retail/entertainment/restaurant/health club use, 1 space for each 100 square feet of entertainment use, and a total of 105 parking spaces for the hotel use. A minimum total of 1,094 parking spaces shall be required on-site. The project shall provide a maximum of 1,464 parking spaces. These parking spaces shall be provided in the locations as depicted in Exhibit A.
5. **Bicycle Parking.** The project is exempt from LAMC 12.21 A.4, 12.21 A.4(c), 12.21 A.16 and 12.21.1 A.5 (the Bicycle Parking Ordinance 182,386). However, as required by project specific Transportation Demand Management measures, the project shall provide bicycle racks on site to the satisfaction of LADOT.
6. **Streetscape.** The project shall comply with the LASED Streetscape Plan. All required street trees shall be as required by the Streetscape Plan.
 - a. A minimum 15-foot wide sidewalk and 8-foot private setback shall be provided along Figueroa Street.
 - b. A minimum 15-foot wide sidewalk shall be provided along 11th Street, 12th Street and Flower Street.
 - c. The area identified as the "Gallery Entry Forecourt" on Exhibit A, and enhanced with a "red carpet" LED walkway is permitted to vary from the required Streetscape

Exhibit I

Plan. In this particular location, fronting on Figueroa Street, the public right-of-way may be enhanced as shown on Exhibit A. All remaining public rights-of-way shall be developed in accordance with the LASED Streetscape Plan.

- d. The applicant shall record a covenant guaranteeing to the City that the project shall improve and maintain the public right-of-way in accordance with the LASED Streetscape Plan to the satisfaction of the Bureau of Engineering.
7. **Building Projection.** A portion of the building is permitted to project from the façade of the main building to the property line on Figueroa Street, as shown on Exhibit A. A cantilevered hotel pool deck will project over the private setback at a height of 80 feet; this hotel pool deck will not contain floor area and only contains open space.
8. **Lot Coverage.** The three high rise residential towers shall have a maximum lot coverage of 60% of the lot area at their base (101-175-foot level), 20% at the 176-500-foot level, and 10% at the 501-632 foot-level. These lot coverages reflect approval of a Project Permit Height Adjustment and shall be located with the dimensions as shown on Exhibit A.
9. **General Open Space.** The landscape and design of all open spaces shall be in accordance with Exhibit A. A total of 101,309 square feet of general open space shall be provided as shown on Exhibit A and shall be in accordance with the LASED Specific Plan Design Guidelines.
 - a. The dimensions of the required Plaza (Entry Forecourt as labeled on the plans) shall be revised so as to not include areas that are not open to the sky. It shall be a minimum of 1,000 square feet.
 - b. The project shall provide a minimum of one roof terrace.
10. **Residential Open Space.** The project shall provide 130,557 of common residential open space. A minimum of 75,600 square feet of the provided common residential open space shall meet the LASED Specific Plan standards for Residential Open Space Requirements in Section 10.B.2 of the Specific Plan including providing a minimum of 25% planted area, except that this requirement shall not apply to any indoor recreation room counted toward the residential open space requirements.
11. **Landscape Plan.** All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Department of City Planning Department. The Final Landscape Plan shall include a revised Open Space Summary which matches the Open Space types and standards contained in the LASED Specific Plan Design Guideline 8.
12. **Drop-off/Valet/Loading Space.** Approval of the proposed drop-off/valet spaces along 11th Street, 12th Street and Flower Street as shown on Exhibit A is subject to final approval by LADOT and the Bureau of Engineering as to required terms and conditions. The required 15-foot wide sidewalk along 11th Street, 12th and Flower Street shall be provided at all points along the street as part of the public right-of-way or as part of an easement, as required per the approved LASED Streetscape Plan. No portion of the building shall project over the required public sidewalk or sidewalk easement.

Exhibit I

Tower, at 632 feet in height, exceeds the Tower Height limits and thus has requested a Specific Plan Project Permit Adjustment, which is discussed below.

Permitted Uses

The proposed project is a mixed-use tower with 183 hotel rooms, 504 dwelling units, and 166,583 square feet of Retail/Entertainment/Restaurant uses. These are all permitted uses within the Specific Plan.

Yard and Setback Requirements

The project will provide the required private setback of 8 feet on Figueroa Street, per Appendix A. However, as permitted in this Determination letter, a portion of the building is permitted to project from the façade of the main building to the property line on Figueroa Street, over the private setback of 8 feet. A cantilevered hotel pool deck will project over the private setback at a height of 80 feet; this hotel pool deck will not contain floor area and only contains open space. The cantilevered hotel pool deck is described in more detail below.

G. Section 10: Urban Design Regulations

- 1) Section 10.A.4 Building Height and Massing for Figueroa Central Subarea. Section 10.A.4 requires a maximum permitted podium height not to exceed 100 feet; requires a maximum permitted tower height not to exceed 575 feet. This section requires towers adjacent to Figueroa Street to be set back 20 feet from the edge of the podium that is adjacent to Figueroa Street. It also limits the allowed lot coverage for towers based on the heights of those towers. The proposed project consists of three towers on top of a podium. All three towers are setback at least 20 feet from the edge of the Podium adjacent to Figueroa Street. The podium height, which is 100 feet, complies with Section 10.A.4. Excluding rooftop mechanical equipment and screening and spires, the height of the North Tower is 632 feet which constitutes a less than 10% increase in overall height; the applicant has requested a Specific Plan Project Permit Adjustment for the increased height, which is described below. Excluding rooftop mechanical equipment and screening and spires, the proposed height of the South Towers are 500 feet which complies with the requirement.

The applicant is requesting a Specific Project Permit Adjustment to increase the Tower Height zone for towers up to 455 feet in height to 500 feet in height, which is a less than 10% increase to the permitted height zone. The Specific Plan requirements and the project proposal is described in the table below:

Height Range of Combined Towers	Permitted Lot Coverage Range for Combined Towers	Proposed Lot Coverage Range for Combined Towers
0-100 feet height	100%	82.8%
100-160 feet height	60%	40.4%
160-455 feet in height	20%	19.9%
455-500 feet in height	20%	19.9%
501-632 feet in height	10% see below	7.9% see below

Approval of a Specific Plan Project Permit Adjustment is required to Specific Plan Section 10.A.4 b. to increase the Tower height zone for towers up to 455 feet in

Exhibit I

or through the Department of City Planning website at <http://cityplanning.lacity.org>. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

Michael J. LoGrande
Director of Planning

Approved by:



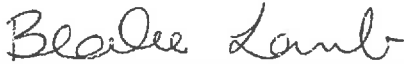
Daniel Scott, Principal City Planner

Reviewed by:



Shana Bonstin, Senior City Planner

Prepared by:

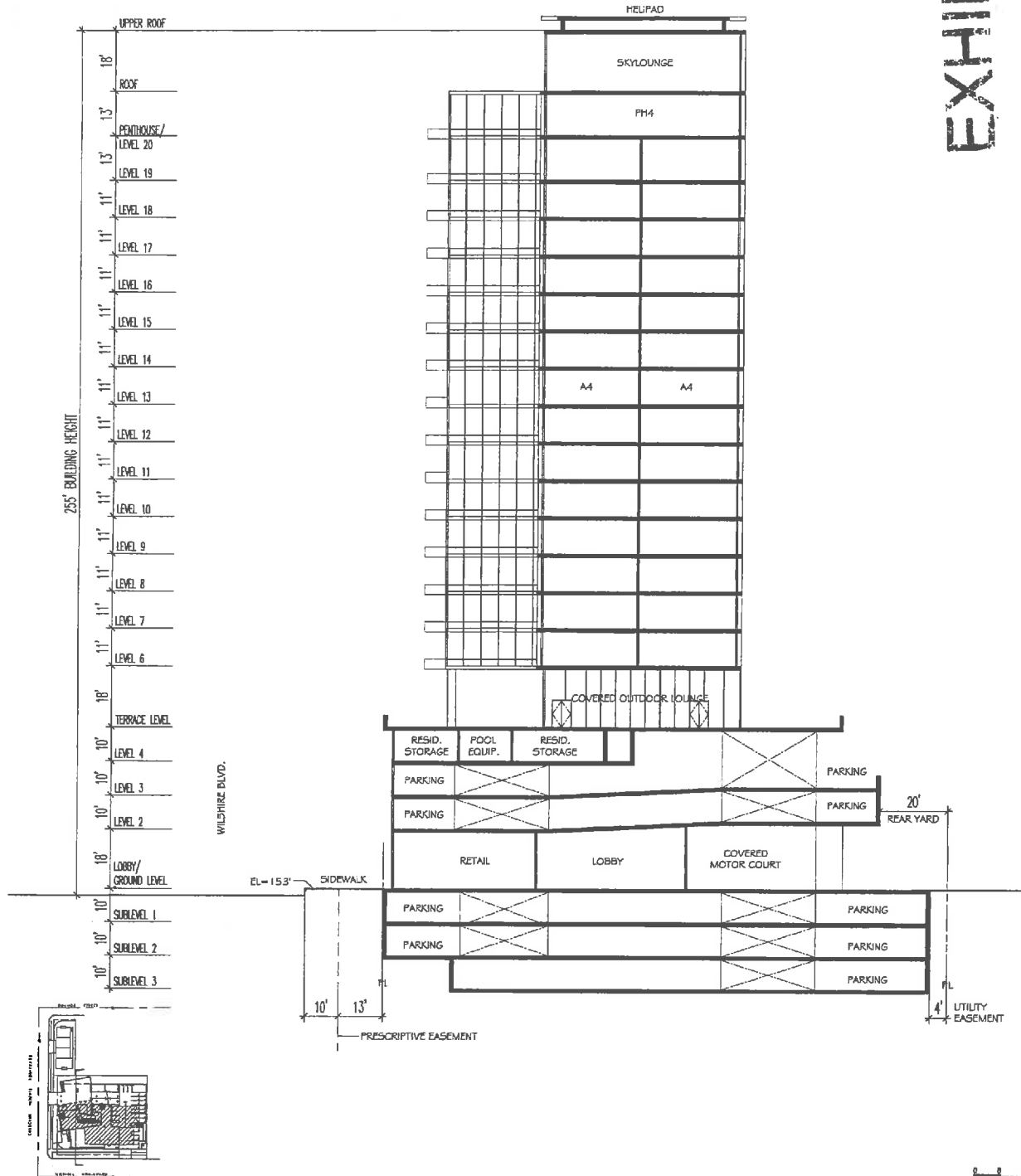


Blake E. Lamb, City Planner
(213) 978-1167

Exhibit J

EXHIBIT "A"

NA-2008-446
p 16 of 44



5-27-10

GMP ARCHITECTS-LA
 411 WILSHIRE BLVD, SUITE 820
 LOS ANGELES, CA 90017
 T 213-234-1118
 F 213-234-0118
 www.gmparchitects-la.com

VTTM - 158 UNIT PROJECT

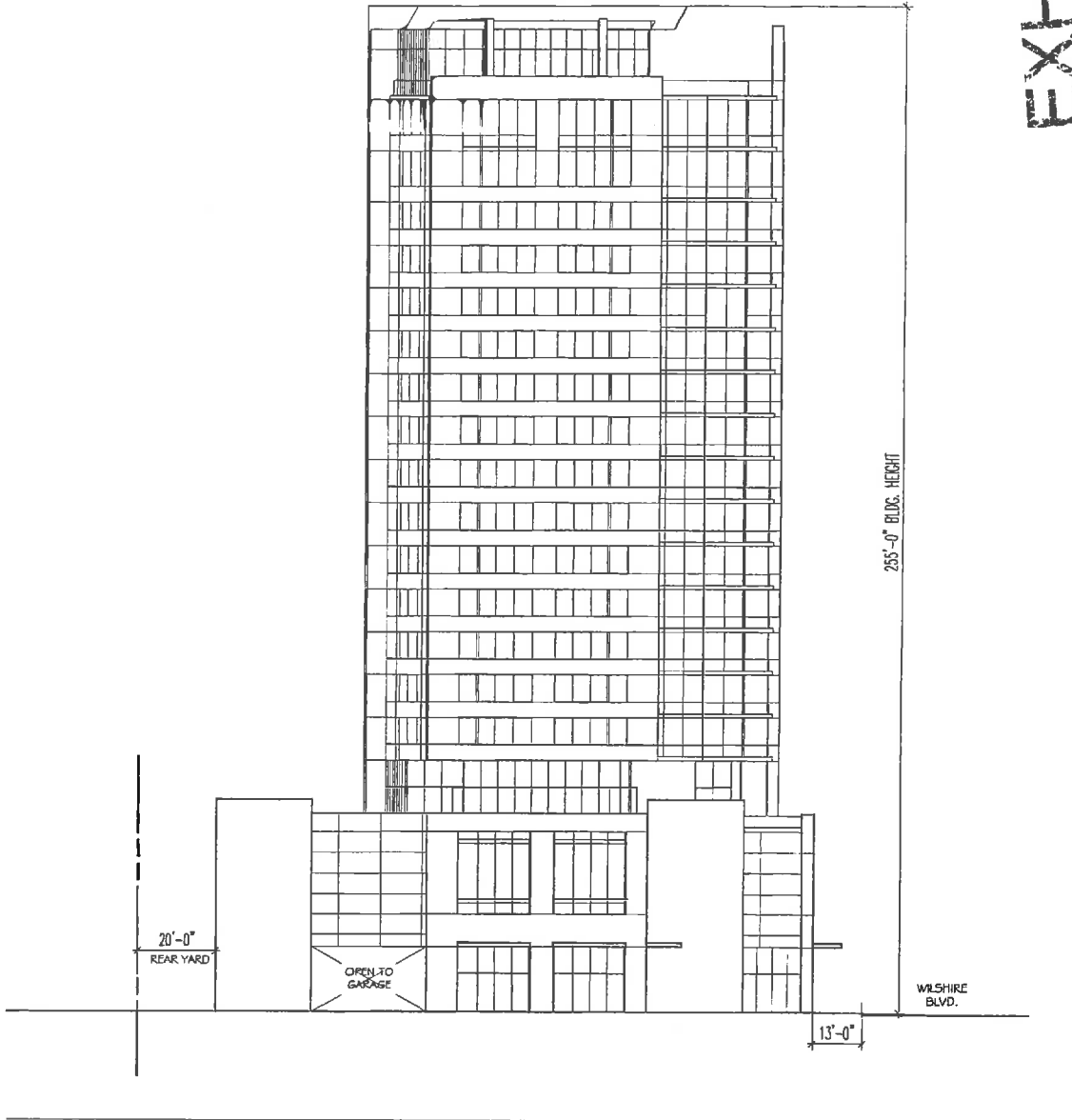
SECTION
 2.02

WILSHIRE/CRESCENT HEIGHTS

THE HANCOCK COMPANY
 2845 204th Street, Suite 100, Torrance, CA 90503
 310-209-1100

Exhibit J

EXHIBIT "A"
CA-2000-4140
p 20 of 24



5-27-10

GMP ARCHITECTS-LA
811 WILSHIRE BLVD. SUITE 1000
LOS ANGELES, CA 90017
T 213-234-0118
F 213-234-0119
www.gmparchitects-la.com

V T M - 158 UNIT PROJECT

CRESCENT HEIGHTS ELEVATION (WEST)

3.01

WILSHIRE/CRESCENT HEIGHTS

THE HANCOCK COMPANY
3601 GUNPOWDER BLVD. SUITE 1000
LOS ANGELES, CA 90018
TEL 310-551-1100 FAX 310-551-1101

MICHAEL LOGRANDE
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

R. NICOLAS BROWN
SUE CHANG
LOURDES GREEN
LINN K. WYATT
MAYA E. ZAITZEVSKY

CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF
CITY PLANNING

S. GAIL GOLDBERG, AICP
DIRECTOR

OFFICE OF
ZONING ADMINISTRATION

200 N. SPRING STREET, 7TH FLOOR
LOS ANGELES, CA 90012

(213) 978-1318
FAX: (213) 978-1334

www.lacity.org/PLN

Exhibit J

July 27, 2010

Kevin Batchelor (A)(O)
Wilshire Crescent Heights, LLC
5847 San Felipe, Suite 3600
Houston, TX 77057

Jessica Pakdaman (R)
Craig Lawson & Co., LLC
8758 Venice Boulevard, Suite 200
Los Angeles, CA 90034

CASE NO. ZA 2008-4140(ZAA)(SPR)
ZONING ADMINISTRATOR'S
ADJUSTMENT, SITE PLAN
REVIEW

6233-6245 West Wilshire Boulevard,
652-658 ½ South Crescent Heights
Boulevard

Boyle Heights Planning Area

Zone : [Q]C4-2D-O, [Q]R3-1-O

D. M. : 135B177

C. D. : 5

CEQA : ENV-2008-0729-MND

Legal Description : Lots 15-19, Tract
7555

Pursuant to Los Angeles Municipal Code Section 12.28, I hereby APPROVE:

an adjustment from Section 12.21-C,1(a) of the Los Angeles Municipal Code to permit the buildable area of the lot to be based upon the original lot lines, including the lot areas used for required street dedications, the 13-foot prescriptive easement area along Wilshire Boulevard and the lot area used for required yard setbacks;

an adjustment from Section 12.16-C,2 of the Los Angeles Municipal Code to permit a 0-foot easterly side yard setback on Master Lot No. 1 for floors 1 through 4 in lieu of the 16 feet required in the [Q]C4-2D-O Zone;

an adjustment from Sections 12.21.1-A,2 and 12.21.1-A,5 of the Los Angeles Municipal Code to permit the covered outdoor common open space area located on the fifth floor podium level rooftop amenity area to be excluded in the calculation of floor area; and

Pursuant to Los Angeles Municipal Code Section 16.05, I hereby APPROVE:

a site plan review for a development with 50 or more dwelling units,

upon the following additional terms and conditions:

The applicant is requesting a zero-foot side yard setback only for the commercial and parking podium portion (Levels 1 through 4). The residential portion of the tower and townhouse units will all observe the required setbacks. Since the easterly side yard abuts a commercially-zoned property, granting the adjustment would lead to a development that would be consistent with surrounding uses.

The applicant is requesting the overhang area at the fifth floor podium deck level be excluded from the calculation of floor area since it is intended to serve as covered outdoor open space that will complement the uncovered outdoor open space also provided on the fifth floor podium deck level. The overhang area is open on three sides and is architecturally integrated into the residential tower above.

The granting of the adjustment will allow for the development to be compatible and consistent with the surrounding uses. The requested adjustments will lead to a project that will be project will be developed at an FAR of 4.5:1, which will be consistent with surrounding uses. Granting the requested entitlements

2. The granting of an adjustment will be in conformance with the intent and purpose of the General Plan of the City.

The Wilshire Community Plan is "intended to promote an arrangement of land use, circulation, and services, which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the District, within the large framework of the City." The granting of the adjustments will create opportunities for new housing and attract residents and local employees to area. The development will complement surrounding uses by providing density along the Wilshire Corridor, providing a mixed use development to promote a complement of uses, and help promote safety by providing eyes on the street.

The project will be in conformance with the Transportation Element, which states the following:

Objective 3 Support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards in the Community Plans.

Also, granting the requested adjustments will lead to a development that is in conformance with the Wilshire Community Plan. The Plan describes the following:

- Improved land use transitions are needed between commercial uses and single-family and multiple-family areas.
- Increased off-street parking areas and facilities, open space, and recreational facilities are needed, particularly in multiple family residential areas.
- New development needs to be coordinated with the availability of public infrastructure.

- Improved appearance of strip commercial developments is needed, with concise, clear signage, better visual identity, adequate parking, and convenient access.
- Improvements to the appearance of new construction is needed through additional landscaping and more imaginative architecture to offset an otherwise severe industrial appearance along some major thoroughfares.

The applicant has requested that the 13-foot prescriptive easement be included as part of the calculation of the buildable area. By granting this request, the applicant would be able to develop with a buildable area that technically should not have been paved, while maintaining the easement along Wilshire Boulevard. While adjustments for side yards are not mentioned in the Community Plan, granting the request for such would allow for parking and commercial uses to be provided to bring convenience to residents and local neighbors. The project would provide adequate parking, while bringing in neighborhood-serving retail to reduce automobile use, and promote stronger interactions between residential and commercial uses within the local area. Finally, the applicant is requesting the overhang area at the fifth floor podium deck level be excluded from the calculation of floor area since it is intended to serve as covered outdoor open space that will complement the uncovered outdoor open space also provided on the fifth floor podium deck level. Granting this request would be consistent with the General Plan since it would create more opportunities for residents to use the outdoor open space, without increasing floor area. The requested adjustment for the covered open space area to be excluded from floor area calculations would lead to a development that has a floor area ratio of 4.5:1, be in scale with surrounding buildings along Wilshire Boulevard.

3. **The granting of an adjustment is in conformance with the spirit and intent of the Planning and Zoning Code of the City.**

Buildable Area Designation

The requested adjustment to base buildable area on the lot area prior to street dedications, including the 13-foot prescriptive easement, is in conformance with the spirit and intent of the Planning and Zoning Code of the City. The project locates a high-rise mixed use building on a site zoned [Q]C4-2D-O with a Regional Center Commercial land use designation. The site is along Wilshire Boulevard, a major corridor. The intent of the code is to allow for development that is compatible with existing uses. Granting the adjustment will lead to a development that is in scale and compatible with other developments along Wilshire Boulevard.

Reduced Easterly Yard Setback

The spirit and intent of the yard setback requirement is to allow for light, air, and privacy for the residential dwelling units. The residential tower of the proposed project will meet all yard setback requirements. Also, the parking podium will observe the required rear yard setback, and serve as a buffer between the

proposed project and existing residential development. The easterly yard setback abuts a commercially-zoned property, more specifically, the associated surface parking lot that serves the mid-rise office building. Therefore, the reduced easterly side yard setback will have no impact on access to light, air, and privacy for any nearby residential dwelling units.

Covered Outdoor Area

Most of the amenity deck is open to the sky, but a portion is recessed under an overhang of the residential tower above. This overhang area is intended to be common open space and will not be enclosed as a portion of the building, and, therefore, should not be counted as floor area. Covering a portion of the outdoor common open space complements the uncovered open space by providing an outdoor area that can be utilized in the rain and provides shade during hot weather. Covering this area does not reduce the usable open space area so much as it creates more opportunities to use the outdoor open space. Therefore, the requested adjustment to exclude the covered open space area from the floor area calculations is in conformance with the spirit and intent of the Planning and Zoning Code.

4. **There are no adverse impacts from the proposed adjustment or any adverse impacts have been mitigated.**

Buildable Area Designation

The proposed high-rise tower will not extend into the 13-foot prescriptive easement area (or areas lot to street dedications), except as permitted by the Department of Building and Safety by airspace easement or revocable permit. The proposed project will be in line with surrounding development, and there will be no adverse impacts from the requested adjustment.

Reduced Easterly Yard Setback

There will not be any adverse impacts on the property to the east because that property is currently developed with an office building and associated surface parking. These uses do not need the light, air, and privacy that are the intent of the residential setback requirements. The Draft EIR for the proposed project also analyzes the proposed reduced easterly yard setback, and finds that no significant land use compatibility or consistency issues would result from the proposed project.

Covered Outdoor Area

Most of the amenity deck is open to the sky, but a portion is recessed under an overhang of the residential tower above. This overhang areas has been designed to be common open space and will not be enclosed as a portion of the building, and therefore, should not be included as part of floor area calculations. Covering a portion of the outdoor common open space complements the uncovered open space by providing an outdoor area that can be utilized during rainy days, and can

provide shade during hot weather. Covering this area does not increase the actual floor area of the building, since this area is intended as outdoor area. The covered amenity area creates more opportunities to use the outdoor open space, without increasing floor area. The requested adjustment to the covered open space area to be excluded from floor area calculations would lead to a development that has a floor area ratio of 4.5:1, and addresses the overall impacts with mitigation measures and project benefits to address any adverse impacts.

5. **The site and/or existing improvements make strict adherence to zoning regulations impractical or infeasible.**

Buildable Area Designation

The project site has special circumstances that make strict adherence to zoning regulations impractical and infeasible. The City paved over a portion of the private property abutting the Wilshire Boulevard right-of-way. In doing so, the City obtained a prescriptive easement to use the property and did not acquire the property outright. Therefore, the existing improvements, i.e., sidewalk paving located within an easement on private property, should not preclude the proposed project from using this area, including the area lost to street dedications, in density and floor area calculations.

Reduced Easterly Setback

Strict adherence to zoning regulations is impractical and infeasible because they reduce the lot's usable space in a manner not applicable to surrounding developments. The project site is located in a [Q]C4 Commercial Zone and is surrounded by existing improvements – residential and commercial development as well as associated surface parking - that have no setback needs or requirements. Also, the required easterly side yard setback allows for more of the project site to be utilized for the proposed project, while having no negative impact on the abutting property, which is improved with an office building and associated surface parking. Thus, requiring the easterly side yard setback would result in a more constrained project site, making development of the project both impractical and infeasible.

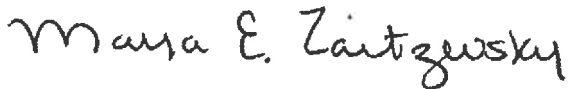
Covered Outdoor Area

The covered outdoor common open space area will be available to the residents of the proposed project in the same manner as the uncovered outdoor area. This area is open on all sides (except where the residential tower exists). There are no plans or intent to enclose this area as floor area, so the overhang area should not count as floor area. The proposed project meets the total open space requirements of LAMC Section 12.21-G. Therefore, there are no adverse impacts to the residents of the proposed project or to the surrounding community from the proposed adjustment to exclude the covered common open space area from floor area calculations.

The custodian of the documents or other material which constitutes the record of proceedings upon which the Director's decision is based is the City of Los Angeles, Planning Department, located at 200 North Spring Street, Room 750, Los Angeles, California 90012.

I concur with the report prepared by, Henry Chu Planning Staff for the Office of Zoning Administration, on this application and approve same.

HENRY CHU
City Planner
(213) 473-9919



MAYA E. ZAITZEVSKY
Associate Zoning Administrator
Direct Telephone Number (213)978-1416

MEZ:jjq

cc: Councilmember Paul Koretz
Fifth District
Adjacent Property Owners