



March 15, 2016

Respondents:

DLANC Board of Directors
Stephen Kane, Secretary
Patti Berman, President
P.O. Box 13096
Los Angeles, CA 90013-0096

Transmitted Via Electronic Mail and
Via USPS Certified Mail

DLANC Planning and Land Use
Committee
Simon Ha, Chairman
P.O. Box 13096
Los Angeles, CA 90013-0096

7012 2210 0002 2244 2384

**DIR – 2015- 2976-TFAR-SPR;
ENV-2015-2977-EAF**

Grayce Liu, General Manager,
Department of Neighborhood
Empowerment
200 N. Spring Street, Suite 2005
Los Angeles, CA 90012

Mike Feuer, Los Angeles City Attorney
200 N. Main Street, 8th Floor
Los Angeles, CA 90012

Re: **Grievance Pursuant to DLANC Bylaws
Demand for Cure or Correction Pursuant to Brown Act**

Attention Respondents:

Please take Notice that the following constitutes both a legal Grievance pursuant to Article XI of the Downtown Los Angeles Neighborhood Council (“DLANC”) Bylaws and a formal Brown Act Complaint pursuant to the provisions of California Government Code Section 54950 et seq.



Statement of Facts

The Eastern Columbia Building is one of Los Angeles' most beautiful and historically significant structures. Situated within both the Los Angeles Historic Core and a National Historic District, it was designated by the Department of City Planning as Historic-Cultural Monument Number 294 in 1985. It is listed in the National Register of Historic Places as well as the California Register, and both the structure and its distinctive Clock Tower are recognized worldwide as a premier example of Art Deco Architecture.

The SP-DTLA is a 501(c)(3) non-profit, all-volunteer California Benefit Corporation representing the interests of its members – all of whom are DLANC Stakeholders - in preserving the unique, historic nature and character of existing Downtown Los Angeles Communities. The undersigned (“Claimants”) bring this Grievance and Demand individually and on behalf of the members of the SP-DTLA.

Trammel-Crow Residential (“Applicant”) is a Dallas, Texas based developer which has applied to the City under the guise of Maple Multi-Family Land CA, L.P. for permission, pursuant to Los Angeles Municipal Code sections 14.5.7 and 16.05, to construct a massive, ultra-modern, steel and glass mixed-use building within the City’s Historic Core and immediately adjacent to the residential Eastern Columbia Building. At 30 stories, the proposed commercial structure would undeniably tower over all other buildings in the Historic Core, disfigure their currently compatible appearance, and overwhelm the Eastern Columbia Building, completely blocking twenty-five percent of its iconic Clock Tower from public view. The Applicant has presented no evidence that the proposed construction will serve any public benefit and has refused all requests to reduce the proportions and appearance of its plans so as to conform to recognized and applicable compatibility standards on the ground that any reduction in size and mass of its proposed structure would not provide Applicant with what it considers sufficient “corporate yield” *i.e.* financial benefit to itself.

The DLANC Planning and Land Use Committee (“PLUC”) considered the proposed construction and Applicant’s request for special entitlements at a well-attended public meeting on January 19, 2016 (the “PLUC Meeting”). After a lengthy presentation by the Applicant and many time-restricted public comments (the overwhelming majority of which opposed the project), the Committee voted “to approve” the Application. This “approval” was presented to the full DLANC Board (the “Board”) as a “recommendation for action” at its regularly scheduled meeting on February 9, 2016 (the “NC Board Meeting”).



At the NC Board Meeting, following presentation of the PLUC recommendation, time-restricted public comment, and extensive personal opinion comment by PLUC Chairman Mr. Ha, a majority of the DLANC Board voted to approve the recommendation that a letter of support by the DLANC for the proposed project (a draft of which was not presented to either the Board or the public) be sent to the Los Angeles City Planning Department.

Because the PLUC Meeting, the NC Board Meeting and other actions by Board and Committee members were unfair, biased and unlawful, the SP-DTLA brings this formal Grievance and Demand for Cure or Correction as allowed by law, and respectfully requests (1) that the action of the Board in approving the recommendation of the PLUC be declared null and void, (2) that the PLUC be directed NOT to send any letter to the Planning Department prior to the resolution of this Grievance and Demand or, alternatively, that in the event any such letter has already been sent, that a letter of retraction immediately be sent to said Department with an explanation that the DLANC Letter of Support is withdrawn, and (3) that the participants in any Brown Act violation(s), if proved, be subject to such sanctions as are allowed by law.

Grievance Pursuant to DLANC Bylaws Article XI

The Claimants submit this Grievance to the DLANC for action pursuant to Article XI of its Bylaws. In accordance with Section A thereof, Claimants request that this matter be placed on the Agenda of the next regular DLANC meeting, that the matter be referred to an impartial Ad Hoc Grievance Panel are required by Section B of said Article, and that the matter be resolved in accordance with the procedures set forth in sections C through G.

This Grievance is based on the following facts and arguments, all of which are discussed in greater detail below:

1. The PLUC did not consider the legal requirements for granting the Application.
2. Neither the PLUC nor the Board are qualified to determine if the proposed project satisfies the legal requirements for granting the Application.
3. The PLUC did not give sufficient consideration and weight to written opposition of the LA Conservancy.
4. The PLUC did not follow its own policies and procedures as well as the stated interest of the DLANC at large.



5. The PLUC inappropriately met privately with only the Applicant prior to the PLUC Meeting.
6. Opponents were not given a fair chance to present their case.
7. The PLUC and Board members based their decisions on personal opinion rather than on the will of the majority of the stakeholders they are charged to serve.

The PLUC did not consider the legal requirements for granting the Application.

The Applicant is not entitled by right to build its proposed massively dense, intrusive, non-conforming structure. To the contrary, in order to be granted the special permission (entitlements) it needs to satisfy its purely economic goal, it must satisfy all of the legal requirements of LAMC Sections 14.5.7 and 16.05. Neither the PLUC nor the NC Board, however, considered the express terms of either of the relevant code sections in deciding that the project should be supported by the DLANC. Both the PLUC and the Board acknowledged that the proposed project is **in fact** situated in the Historic Core and not, as Applicants have inappropriately alleged, in South Park. The PLUC and the Board also acknowledged that the proposed structure is **in fact not compatible** with the surrounding historic buildings. The PLUC and the Board failed, however, to consider that given these acknowledged facts, the Application fails to meet the requirements of the relevant code sections because at no time, despite opposition request, did the PLUC or Board actually look at or otherwise consider the law applicable to the Application.

Neither the PLUC nor the Board are qualified to determine if the proposed project satisfies the legal requirements for granting the Application.

Opponents to the project presented evidence at both the PLUC Meeting and the NC Board Meeting of the specific legal requirements the Applicant must meet in order to be granted the requested entitlement. These requirements include, among other things, consideration of and/or conformance with the following written policies, standards and guidelines: ***The Secretary of the Interior Standards and Guidelines for the Treatment of Historic Properties, the California State Historic Building Code, the County of Los Angeles General Plan, the City of Los Angeles General Plan, the Downtown Design Guidelines, the Historic Downtown Los Angeles Design Guidelines, The Central City Community Plan, the Cultural Heritage Ordinance, the Neighborhood Conservation Initiative, The Broadway Theater Entertainment District Design Guide, the Los Angeles Cultural Heritage Master Plan, SurveyLA, ReCode LA, and the California Environmental Quality Act.*** In deciding to support the Application, the Board, despite opposition request, failed to



acknowledge or consider **any** of the above-mentioned policies, standards and guidelines. Given the specific special, unique, and important legal preservation considerations and potential precedent-setting consequences of this matter, it should have been clear to both PLUC and Board members that they are not independently, personally qualified to render a competent decision on the Application. Both the PLUC and the DLANC Board had an obligation to exercise due diligence to determine that specific legal and design guidelines must be met by the Applicant, to seek expert review and advice on the Application in light of these legal and design guidelines, and to withhold any decision on the Application pending consultation with and recommendations from competent legal and preservation experts.

The PLUC did not give sufficient consideration and weight to written opposition of the LA Conservancy. LAMC Section 14.5.7 (which the Committee and the NC Board failed to review) requires, among other things, that an Applicant's plans must comply with the Downtown Design Guide, which in turn specifies, "*Projects in the Historic District must comply with the Historic Downtown Los Angeles Design Guidelines (July 2002) sponsored by the Los Angeles Conservancy.*" Despite this clear statement, the PLUC in voting "to approve" the project and the Board in accepting the PLUC's recommendation (1) failed to read and consider the Historic Downtown Los Angeles Design Guidelines, and (2) rejected (by failing to read and/or discuss) the written opinion of the LA Conservancy that the proposed project does not meet requisite design standards. As author of the Historic Downtown Los Angeles Design Guidelines, the Conservancy is without question the highest and best authority on whether or not a proposed development in the Historic Core meets those Guidelines. Despite this fact, which was repeatedly brought to their attention by Claimants, both the PLUC and the Board ignored the Conservancy's written expert opinion, adopting instead an oral statement from PLUC Chairman Mr. Ha that in his personal view, the Application meets the requirements of the Historic Downtown Design Guidelines. Because this biased, unsupported and non-expert oral statement of one member's personal opinion formed the basis for both the PLUC's recommendation and the Board's decisions, both are fatally flawed.

The PLUC did not follow its own policies and procedures as well as the stated interest of the DLANC at large. The PLUC has developed and made public specific written Development Principles, Criteria and Guidelines for the Evaluation of Proposed Projects, which were formally adopted for use by the Board February 25, 2009 ("Principles, Criteria and Guidelines"). Attached hereto is a letter entitled "Request to Deny Applicant/Position Statement" dated January 19, 2016, which details specifically how the Application deviates from the



PLUC's own stated Principles, Criteria and Guidelines (the "Position Statement). Although submitted to both the PLUC and the Board, the Position Statement was ignored by both entities. Because the PLUC did in fact fail to follow its own Principles, Criteria and Guidelines in recommending that the Board support the Application, its recommendation and the Board's subsequent adoption thereof must both be considered null and void.

The Committee inappropriately met privately with only the Applicant prior to the Committee Meeting. At the PLUC Meeting, five (5) Committee members admitted that they attended a private meeting with the Applicant. No public notice of this meeting was given, and, despite the PLUC's knowledge of significant and substantial controversy surrounding and opposition to the Application, no stakeholders or other known opponents were invited to attend. At the least, for the PLUC to hold a private meeting between a substantial number of Committee and Board Members and developers without inviting even one member of the known opposition clearly violates the DLANC's stated Mission and Policies (and that of all Neighborhood Councils), including, without limitation, the obligation to represent the community it serves fairly, openly and transparently. Moreover, as set forth in the Brown Act Demand for Cure or Correction below, Claimants believe the meeting constituted a violation of law, and request that an official investigation be undertaken to determine if legal sanctions are in order.

Opponents were not given a fair chance to present their case. First, the PLUC held a private meeting of undisclosed duration with the Applicant in advance of the PLUC Meeting without public notice or invitation to known opponents. Next, at the PLUC Meeting, the Applicant was given unlimited time to present its plans and argument, while all those opposing the Application, whether organized groups or individuals, were limited to one (1) minute in length, and timely filed written opposition was neither read or considered. Finally, at the NC Board Meeting, opponents again were substantially limited in their time to present opposing arguments, despite the complex legal and factual nature of this matter and the NC Board's clear lack of knowledge of relevant law and fact. In addition, timely filed written materials submitted in advance of the meeting were again neither read nor considered by members of the Board. Although strict speaker time limits may be appropriate in some cases (*i.e.* to manage a meeting by avoiding repetition), they are not appropriate if they serve to prevent the full, fair and orderly presentation of legitimate, opposing views. In this matter, especially given the prior private meeting between the Applicant and members of the Board and the Applicant's unlimited presentation time at both meetings, failure by the PLUC and the Board read written opposition and to allow opposing stakeholders sufficient time to present arguments in a cohesive, cogent,



and coherent manner violated both the DLANC Policy “to respect the . . . expression of views of all individuals, groups and organizations within the community” and its Mission “to provide an inclusive and open forum for public discussion.” The PLUC’s and Board’s failure to allow adequate time for opposition argument not only prejudiced the opposition, it deprived the Board of any real ability to reasonably and fairly consider all sides of this very controversial issue.

The PLUC and Board members based their decisions on personal opinion rather than on the will of the majority of the stakeholders they are charged to serve. NC’s do not (or should not) exist for the exclusive benefit of Board and Committee members, and Board and Committee members have a very serious obligation in accepting office to put aside personal opinion and prejudice in favor of representing the public they serve. In arriving at their decisions, both the PLUC and the Board ignored the facts that a clear majority of DLANC stakeholders oppose the proposed project, that over 1,000 concerned individuals have petitioned for its denial, and that it is opposed by the over 6,500 members of the LA Conservancy which is the definitive voice on appropriate development in the LA Historic Core. Of the approximately 100 people present at the PLUC Meeting, only the Applicant’s paid representatives and a very few individuals who claimed to be business stakeholders spoke in favor of the project. At the Board meeting, only the developer spoke in its favor. As stated above, opponents were not given a full and fair opportunity to present their arguments at either the PLUC or Board meeting, and timely filed written opposition was not read or considered by members of the PLUC or the Board. Following the Public Comments at both meetings, in considering how to rule, not one member of the PLUC or Board referred to the law, community opinion or DLANC policy; all deliberations by the PLUC and Board members were based entirely and exclusively on the members’ individual personal opinions, which then were reflected in the final votes. **The purpose of a Neighborhood Council is to represent the interests of the community it serves and not the interests or opinions of individual Board members or of non-stakeholder economically motivated developers.** The PLUC and Board both failed to live up to this purpose and their decisions accordingly must be rejected in order for this and all Neighborhood Councils to retain credibility as representatives of the stakeholders they are charged with the duty to serve.



Brown Act Demand for Cure or Correction

California Government Code Section 54960.1(b)

As noted above, it has been admitted by the PLUC that five (5) out of the ten (10) Committee members met privately with the Applicant in advance of public hearings by the Committee and NC Board on the Application. While it may under certain circumstances be appropriate for less than a voting majority of the voting members of a PLUC or NC Board to meet for the purpose of fact gathering or due diligence, the fact that fully half the PLUC attended this meeting, without inviting opponents or arranging to likewise meet independently with known opposition, is at the very least disturbing. It is also logical to assume that there were communications back and forth among all of the PLUC members to schedule such an event, which, if this occurred, constitutes a Brown Act violation. Finally, whereas ordinarily a vote of 5 would not constitute a majority of the 10 voting members of the Committee, in this case, Claimants believe that at the time of the private meeting, it was known by those attending that one committee member would be required to recuse herself so that **a vote of 5 would in fact constitute a majority vote of the Committee on this matter.**

Under these circumstances, at the least, the Department of Neighborhood Empowerment and the City Attorney should commence an investigation to determine (1) if any prohibited serial communications among Board members occurred, (2) if, based upon a totality of the facts, a violation or violations of the Brown Act occurred, and (3) if so, what, if any, sanctions should be imposed pursuant to California Government Code Section 5490 et seq. in order to maintain the integrity of the Neighborhood Council system. In addition, until the conclusion of that investigation, Claimants request that any findings by the PLUC and NC and official letter(s) sent regarding Application be suspended. Should the investigation reveal any improprieties whatsoever, then any determinations made by PLUC and NC regarding the Application should be declared null and void.

Sincerely,

Alex Hertzberg, Executive Director
Patricia Serenbetz, Deputy Director
Geraldynn Krajeck, Secretary-Treasurer
Bill Cooper, Member-at-Large

BOARD OF DIRECTORS

Society for the Preservation of Downtown Los Angeles

In conformance with California Commercial Code §3401(b) 



cc: Eric Garcetti, Mayor of Los Angeles
Jenna Monterrosa, Department of City Planning
Vince Bertoni , Department of City Planning
Ken Bernstein, Office of Historic Resources
Sara Hernandez, Office of Jose Huizar
Shawn Kuk, Office of Jose Huizar
Clare Eberle, Office of Jose Huizar
Linda Dishman, Los Angeles Conservancy



Mr. Simon Ha, Chairman
Ms. Patti Berman, President
Mr. Ted Nathanson
Mr. Tyler Murphy
Ms. Quinn Tang

Mr. Scott Bytof
Ms. Lauren Mishkind
Mr. John Swartz
Mr. Rick Rodriguez

PLANNING AND LAND USE COMMITTEE
DLANC

RE: ALEXAN PROJECT – 850 SOUTH HILL STREET

Case Number: DIR 2015-2976-TFAR-SPR

**REQUEST TO DENY APPLICATION
POSITION STATEMENT**

Mr. Chairman, Mme. President, and Members of the Committee:

Thank you for taking the time to consider this statement and the grant of time. We are most appreciative for the forum as well as to Trammell Crow Residential/Maple Multi-Family Land CA, LP (hereinafter “Developers”) for listening to the concerns voiced by the community and this Committee in the November meeting, and making changes to their proposed Alexan Project, APN 5144—017-037 (hereinafter “Project”). However, the substance of the Developers’ changes falls far short of meeting the standards set forth by this Committee, the governing Downtown Design Guidelines, The General Plan of the City of Los Angeles as well as the Los Angeles Municipal Code. This position statement will demonstrate the specific areas by which the Developers’ application (MASTER LAND USE PERMIT APPLICATION, dated August 12, 2015, including the revised Case Filing, filed January 14, 2016, (hereinafter “MLUP Application”)) fails to meet the applicable standards. We recognize the value City Planning places upon the stated opinion of Neighborhood Councils in determining whether to grant, request changes to, or deny applications for land use entitlements. We respectfully ask that this Committee recommend that our Council formally oppose the application for all of the following reasons.

Introduction.

Developments that contribute nothing more than to the "urbanization" of the City, without consideration or respect for the character of the neighborhoods in which they propose to be sited, are not in keeping with any stated law or policy.



Background.

The Developers cannot build the Project as proposed by right, and thus they have applied to City Planning for permission, and seek support for the Project from this Committee and our Council.

Contrast versus Compatible.

The law requires that developments be **compatible** with the unique nature and character of the neighborhoods in which they propose to be built.

The Developers in the development of the Project, have elected to **contrast** with the surrounding buildings and the standards set forth in the Downtown Design Guidelines (i.e. **Historic Downtown Los Angeles Design Guidelines** (July 2002), hereinafter “HDTLAG,” / **Downtown Design Guide** (June 15, 2009), hereinafter “DDG”).

The Developers elected to render the Project **compatible** with the buildings in South Park. This violates the standards set forth in the HDTLAG / DDG / Los Angeles Municipal Code (See below).

THE LOS ANGELES CONSERVANCY has determined the Project to be incompatible with the applicable standards, Guidelines and law, out of character with the surrounding neighborhood and thus has formally opposed this project in their letter dated January 19, 2016.

Project Location.

The location of the Project is located within the Historic Core of Downtown Los Angeles Historic Downtown). This is established in Exhibit A – Map of the Study Area established by the HDTLAG [p.5] and:

“The study area for the *Design Guidelines* is defined as S. Hill Street on the west, S. Main Street to the east, 3rd Street on the north, and 9th Street on the south, and includes both sides of each street at the boundaries. While this is a set study area, these design guidelines could be applied to a broader area of the City’s downtown.” HDTLAG [p.2]

As well as in Exhibit B – Historic Downtown, DDG [p.3 Figure 1-1 The Design Guide Applies to the Highlighted Districts]. As well as in Exhibit C – Historic Core, Business Improvement District, District Boundaries Map.



Standards.

In order to be approved, an MLUP Application needs to satisfy the provisions set forth within the following:

- (1) Downtown Los Angeles Neighborhood Council – Planning and Land Use Committee **Development Principles, Criteria and Guidelines for the Evaluation of Proposed Projects** (Adopted February 25, 2009) (hereinafter “DLANC Principles and Guidelines”)
- (2) **Historic Downtown Los Angeles Design Guidelines** (July 2002) (hereinafter “HDTLAG”) / **Downtown Design Guide** (June 15, 2009) (hereinafter “DDG”)
- (3) Los Angeles Municipal Code (hereinafter “LAMC”).

This position statement will demonstrate that the Developer’s MLUP Application fails to meet any of the standards set forth in any of the above.

(1) DLANC Principles and Guidelines.

PLUC MISSION STATEMENT

We recognize that the redevelopment of Downtown has both social and economic impacts, and that *the on-going transformation of our metropolis is occurring against the background of cultural and historic resources that must be preserved.*

GUIDING PRINCIPALS

2. We believe that *land use and planning decisions under our jurisdiction must be evaluated in regard to their potential impact on all residents of the Downtown Los Angeles community*
3. We believe that *Downtown Los Angeles has great cultural and historic significance. Our decisions will be guided by the need to preserve the culture and history of Downtown Los Angeles’ neighborhood districts.*



CRITERIA FOR EVALUATION

2. Design Excellence

Excellence of design should be a high priority when considering any project and its possible variances in new development in Downtown Los Angeles. Downtown Los Angeles should welcome exciting, challenging design. *These new designs should take cues from the existing neighborhood character as well as address existing building typologies, densities, and intensities of use.*

3. Area Enhancement

Building form, surface, and scale should add to the interest of the area. *Buildings of civic and community importance should be of an architecture **appropriate** to their importance to the community.*

6. Development Suitability

General Plan amendments, zone changes, and variances have the potential to establish unwanted precedents in downtown Los Angeles and *any development proposal with such a request should be carefully reviewed for consistency with recent land use plans, policies, and decisions.*

DEVELOPMENT GUIDELINES

HEIGHT LIMITS

5. Building Heights: DLANC encourages the densification of arterials and transit oriented districts (one half mile radius from major transit stops and stations), the gradual increase of height limits into these areas, and *the protection of historic neighborhoods.*

(2a) Historic Downtown Los Angeles Design Guidelines (July 2002)

PURPOSE

The historic character of downtown is one of its greatest assets, and the *Design Guidelines* are intended to highlight and promote these features. They serve as a tool to enhance economic activity and attract investment in the area by *encouraging high quality, historically **compatible** design.* HDTLAG [p.1]

PROJECT GOALS

*Recommend approaches for in-fill construction that achieve design solutions **compatible** with the historic and architectural context* HDTLAG [p.4]



NEW CONSTRUCTION KEY POINTS

Construct new buildings, of **compatible** design with the surrounding neighborhood, on existing surface parking lots. HDTLAG [p.11]

NEW CONSTRUCTION OVERVIEW

New additions, exterior alterations, or related new construction should not destroy historic materials, features, and *spatial relationships* that characterize a building or historic district. The new work should be differentiated from the old, yet ***be compatible with the historic materials, features, size, scale and proportions, and massing to protect the integrity of the property and the environment.*** (Secretary's Standard Number 9). HDTLAG [p.129] (also City of Los Angeles General Plan)

In any district, *common design characteristics, such as **building height and bulk, rhythm of openings, and materials, establish parameters for compatible infill construction.*** HDTLAG [p.130]

The Historic Downtown today has more than 20 open parking lots of varying sizes on prime building sites . . . *Construction of **appropriately scaled, compatibly designed infill buildings** for these sites would restore the urban streetscape and offer great opportunities for creative new construction.* HDTLAG [p.130-1]

Construct new buildings, of **compatible** design with the surrounding neighborhood, on parking lot sites. HDTLAG [p.131]

(2b) Downtown Design Guide (June 15, 2009)

AREAS TO WHICH THE DESIGN GUIDE APPLIES/RELATIONSHIP TO OTHER REGULATIONS

Projects in the Historic Downtown must comply with the Historic Downtown Los Angeles Design Guidelines (July 2002) sponsored by the Los Angeles Conservancy as well as with the Design Guide. Where there is a conflict, the Historic Downtown Los Angeles Design Guidelines shall take precedence.

The Design Guide is intended to provide guidance for creating a livable Downtown. It includes both standards (requirements) and guidelines (suggestions). Standards typically use the word “shall”, an active verb (such as, “provide” or “install”), a clear directive (“are not permitted” or “are required”). Guidelines typically use the word “should” or “consider.” *Projects must comply with standards and are strongly encouraged to comply with guidelines.*



In the spirit of affording maximum creativity, projects that do not adhere to the letter of every provision in the Design Guide, but none-the-less demonstrate a clear alternative approach which is superior to and achieves all the prominent objectives of the Design Guide, will be recognized as valid alternative. [DDG p.2]

BUILDING DESIGNS

Respect historically significant districts and buildings, including **massing and scale**, and **neighborhood context**, while at the same time, encouraging innovative architectural design that expresses the identity of contemporary urban Los Angeles. [DDG p.7]

(3) Los Angeles Municipal Code

SEC. 14.5.7. DIRECTOR'S DETERMINATION.

(b) Conditions of Approval.

(2) The Transfer must **comply with any** urban design standards and guidelines adopted by the City Planning Commission for the area, including **the Downtown Design Guide**, and **other applicable design guidelines**;

SEC. 16.05. SITE PLAN REVIEW.

F. In granting an approval, the Director, or the Area Planning Commission on appeal, shall find:

1. that the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and **any applicable specific plan**;

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

3. that any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.



We support and encourage development that is appropriate to the Historic Core. The proposed Project itself has merit, but as proposed, it is not appropriate to the proposed site.

Dated January 19, 2016

Alex Hertzberg
Executive Director,
Society for the Preservation of Downtown Los Angeles

EXHIBIT A
MAP OF THE STUDY AREA ESTABLISHED BY
THE HISTORIC DOWNTOWN LOS ANGELES DESIGN GUIDELINES
JULY 2002 / PAGE 5

historic downtown LOS ANGELES design guidelines

MAP OF
STUDY
AREA

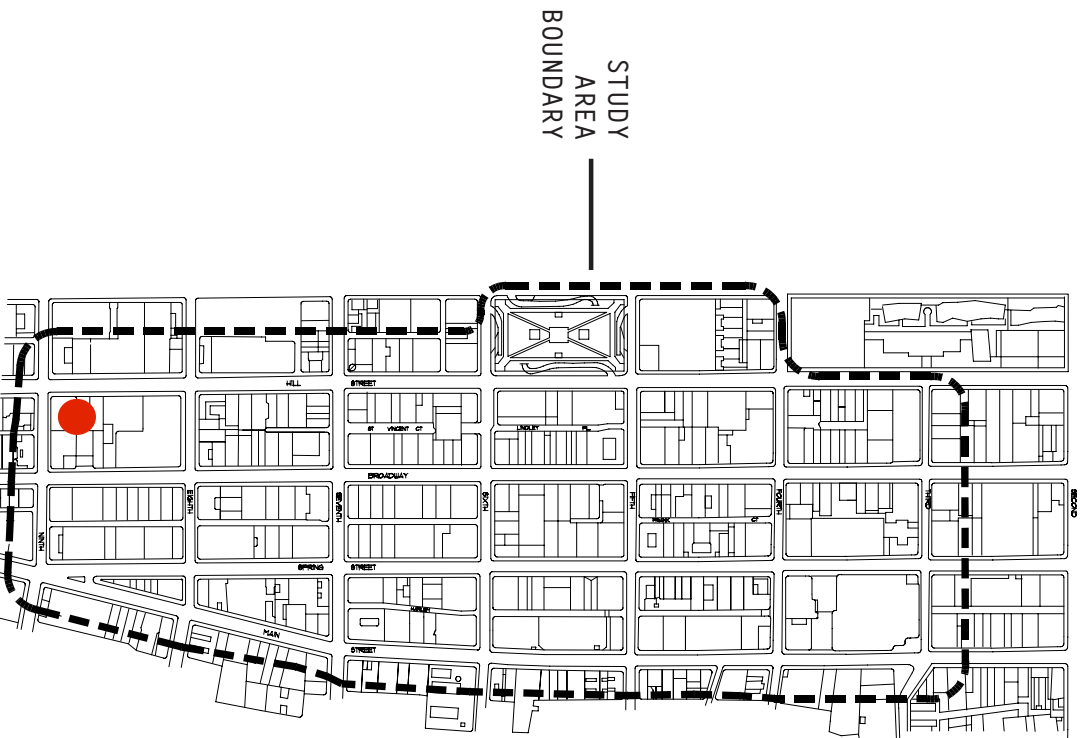


EXHIBIT B
DOWNTOWN DESIGN GUIDE
JUNE 15, 2009
FIGURE 1-1 / PAGE 3



Figure 1-1 The Design Guide Applies to the Highlighted Districts

EXHIBIT C
HISTORIC CORE
BUSINESS IMPROVEMENT DISTRICT
DISTRICT BOUNDARIES MAP



HISTORIC CORE
BUSINESS IMPROVEMENT DISTRICT

DISTRICT BOUNDARIES

