

# **IV. Environmental Impact Analysis**

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## **G. Land Use**

### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to conflicts with land use plans, policies, and/or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

### **2. Environmental Setting**

#### **a. Regulatory Framework**

##### **(1) Regional**

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG)'s 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and the Los Angeles County Congestion Management Program (CMP), administered by the Los Angeles County Metropolitan Transportation Authority (Metro), which regulates regional traffic issues. In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses the attainment of state and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

##### *(a) Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

SCAG's 2016 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the

2016 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.”<sup>1</sup> The 2016 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the Regional Transportation Plan, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. As part of this new approach, the 2016 RTP/SCS establishes commitments to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning in order to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS). The 2016 RTP/SCS also establishes High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.<sup>2</sup> Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within a HQTA as designated by the 2016 RTP/SCS.<sup>3,4</sup>

The Project’s consistency with the applicable goals and policies of the 2016 RTP/SCS is analyzed in Table IV.G-4 beginning on page IV.G-41 in the impact analysis below under **Threshold (b)**.

*(b) South Coast Air Quality Management District Air Quality Management Plan*

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, the SCAQMD has prepared an AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section IV.B, Air Quality, of this Draft EIR for an analysis of the Project’s consistency with the AQMP.

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<sup>1</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. iii.

<sup>2</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

<sup>3</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 5.1: High Quality Transit Areas In The SCAG Region For 2040 Plan, p. 77.

<sup>4</sup> Los Angeles County Metropolitan Transportation Authority, High Quality Transit Areas—Southwest Quadrant map.

(c) *Los Angeles County Metropolitan Transportation Authority Congestion Management Program*

Metro administers the CMP, a state-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The CMP, last revised in 2010, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The CMP guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour be evaluated. The guidelines also require the evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Refer to Section IV.J, Transportation, of this Draft EIR, for further discussion of the Project's consistency with the CMP.

(2) Local

At the local level, several plans and regulatory documents guide development within the Project Site. As described in Section II, Project Description, of this Draft EIR, the Project Site is located within the Hollywood Community Plan area of the City of Los Angeles (City). The Hollywood Community Plan constitutes the local land use policy standards of the City of Los Angeles General Plan (General Plan) for the Hollywood area, and the City of Los Angeles Municipal Code (LAMC) governs land use through specific development and design standards, as well as building and safety codes. The Project Site is also located within the Hollywood Redevelopment Plan area, the Hollywood Signage Supplemental Use District (HSSUD), an Adaptive Reuse Incentive Area, and a Transit Priority Area (TPA) pursuant to SB 743. Applicable plans and associated regulatory documents/requirements are described below.

(a) *City of Los Angeles General Plan*

State law requires that every city and county prepare and adopt a General Plan. The City of Los Angeles General Plan, originally adopted in 1974, is a comprehensive long-term document that provides principles, policies, and objectives to guide future development and to meet the existing and future needs of the City. The General Plan consists of a series of documents, including the seven state-mandated elements: Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the Citywide General Plan Framework Element (Framework Element). The General Plan's Land Use Element is comprised of 35 local area plans known as community plans that guide land use at the

local level. As discussed above, the Project Site is located within the boundaries of the Hollywood Community Plan.

*(i) City of Los Angeles General Plan Framework Element*

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. Chapters that specifically address environmental effects in some way applicable to the Project include Land Use, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides primary objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts, and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. However, these land use categories do not connote land use entitlements or affect existing zoning for properties in the City and are intended to serve as guidelines for the Community Plans.<sup>5</sup>

Based on the Framework Element, the Project is located within a designated Regional Center. A Regional Center is defined as a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Generally different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and

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<sup>5</sup> *As indicated in Chapter 1 of the General Plan Framework, the General Plan Framework neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and Community Plans. The General Plan Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.*

commercial uses. Generally, Regional Centers are characterized by buildings of six to 20 stories (or higher). Regional Centers are usually major transportation hubs.

### Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes the goal of creating a livable city for existing and future residents that is attractive to future investment, and a city of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales. Within this chapter, “urban form” is defined as the general pattern of building height and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, open space, public facilities, as well as activity centers and focal elements. “Neighborhood design” is defined as the physical character of neighborhoods and communities within the City. The Framework Element does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the Community Plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

### Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City’s residents; and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City’s open space issues.

### Economic Development Chapter

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods.

### Transportation Chapter/Mobility Plan 2035

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in

the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. The goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the Transportation Element, the City Council initially adopted Mobility Plan 2035 (Mobility Plan) in August 2015. The Mobility Plan was re-adopted in January 2016 and amended in September 2016.<sup>6</sup> Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan.

The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, the Mobility Plan incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:<sup>7</sup>

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in the Mobility Plan is analyzed in Table IV.G-2 beginning on page IV.G-28 in the impact analysis below under **Threshold (b)**.

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<sup>6</sup> *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, adopted September 2016.*

<sup>7</sup> *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, adopted September 2016.*

### Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems (many of which are interrelated), including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element is analyzed in Table IV.G-1 beginning on page IV.G-21 and the corresponding discussion in the impact analysis below under **Threshold (b)**.

#### *(ii) City of Los Angeles General Plan Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.<sup>8</sup> Section 15 of the Conservation Element establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. As stated therein, it is the City's policy to encourage development that would protect significant land forms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources. The Project's consistency with applicable policies in the Conservation Element is analyzed under **Threshold (b)** on page IV.G-26.

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<sup>8</sup> *City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.*

*(iii) Hollywood Community Plan*

The Hollywood Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. Adopted on December 13, 1988, the specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Hollywood community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.<sup>9</sup>

As shown in Figure IV.G-1 on page IV.G-9, the current land use designation for the Project Site in the Community Plan is Regional Center Commercial. The Project's consistency with applicable land use policies in the Community Plan is analyzed in Table IV.G-3 beginning on page IV.G-30 in the impact analysis below under **Threshold (b)**.

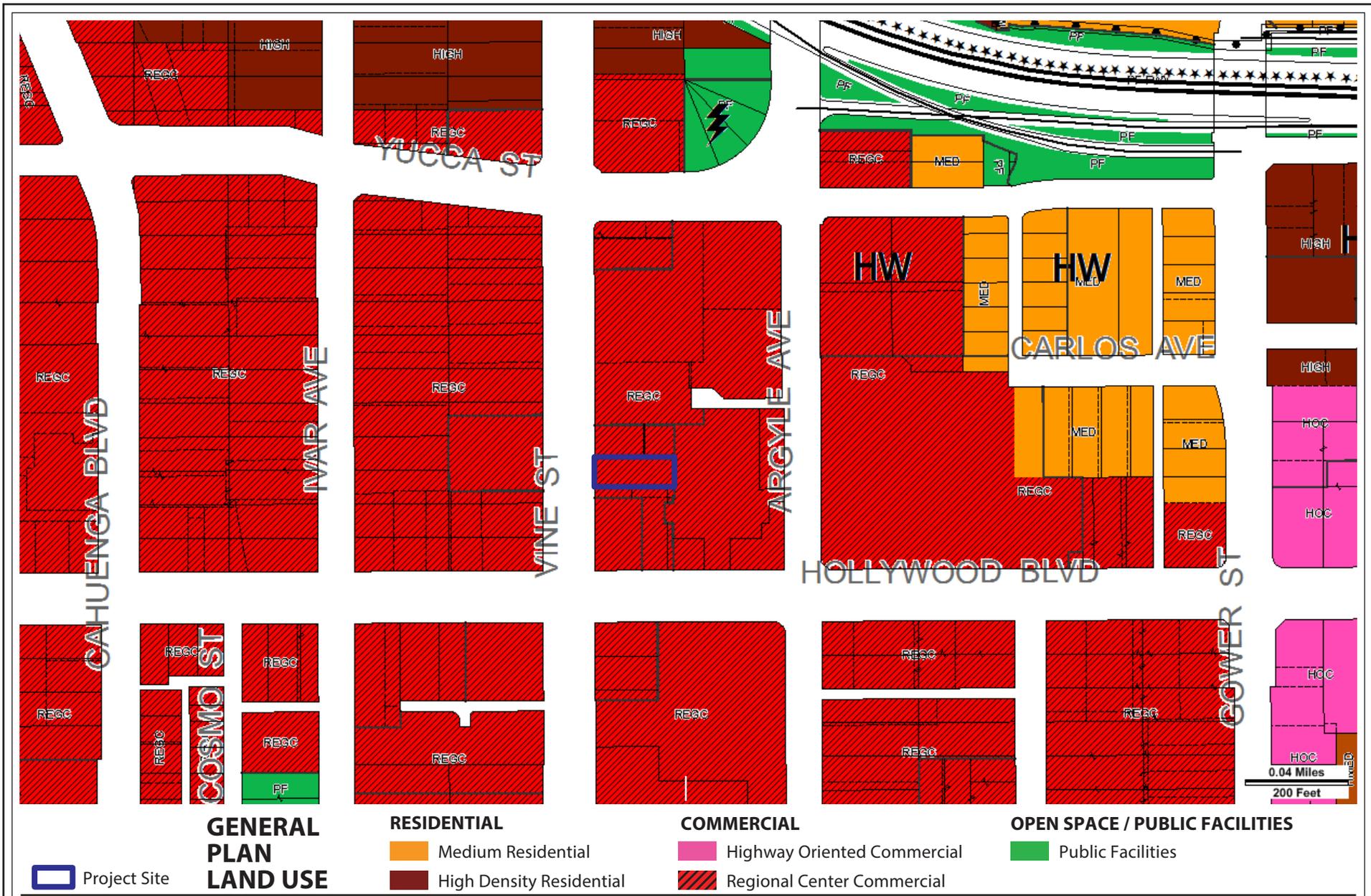
*(b) Los Angeles Zoning Code*

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Figure IV.G-2 on page IV.G-10, the Project Site is currently zoned C4-2D-SN (Commercial, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District [HSSUD]). The C4 zone permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters, as well as single- and multi-family residential uses. The Height District 2 designation, in conjunction with the C4 zone, does not impose a height limitation but it does generally impose a maximum Floor Area Ratio (FAR) of 6:1. However, the "D" limitation on the Project Site, imposed by Ordinance No. 165,659, would limit the total floor area contained in all buildings at the Project Site to a maximum FAR of 3:1.<sup>10</sup> The SN in the zoning designation indicates that the Project Site is located in the HSSUD. The Zoning Code establishes objective zoning and development standards, but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency

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<sup>9</sup> *The City of Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (www.hcpu2.org). As of November 2018, under the current draft, the Project Site's land use designation is proposed to remain Regional Center Commercial, with a proposed zone of [Q]C4-2D-SN-CPIO which would allow hotel uses, a base floor area ratio of 4.5:1, and increased floor area ratio with approval by the City Planning Commission. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Hollywood Community Plan.*

<sup>10</sup> *City of Los Angeles, Ordinance 165,659, May 6, 1990.*



**Figure IV.G-1**  
Existing Land Use Designation on the Project Site



analysis is provided below. However, a discussion of the Project's consistency with the LAMC is provided in Section A, Aesthetics, of this Draft EIR.

(c) *Community Redevelopment Agency of Los Angeles (CRA/LA) Hollywood Redevelopment Plan*

The Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986, and most recently amended on October 31, 2003. The Redevelopment Plan was adopted to support the California Community Redevelopment Law and, as such, was designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under-utilized or improperly utilized properties, eliminate blight, and improve the public welfare.<sup>11</sup>

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which challenged the constitutionality of Assembly Bill (AB)x1 26, the bill that dissolved all California redevelopment agencies. The decision upheld ABx1 26, which led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective February 1, 2012. ABx1 26, however, did not dissolve the redevelopment plans. Therefore, the Redevelopment Plan and its land use controls are still in effect.

Since the City declined to be the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed and the Governor appointed its three-member governing board to wind down the operations of the former CRA/LA. The City of Los Angeles is contemplating the transfer of land use authority of redevelopment plans from the DLA to the City of Los Angeles.<sup>12</sup> However, this transfer has not yet been completed. Accordingly, this Draft EIR addresses the Project's consistency with the Redevelopment Plan, and assumes its applicability until action from the City and/or DLA makes the Redevelopment Plan no longer applicable to the Project Site. For purposes of this Draft EIR, any references to the CRA/LA are intended to include the DLA pursuant to these recent changes.

The Hollywood Redevelopment Project Area (Redevelopment Area) encompasses approximately 1,107 acres bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south,

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<sup>11</sup> *Community Redevelopment Agency of the City of Los Angeles, Redevelopment Plan for the Hollywood Redevelopment Project, as first amended on May 20, 2003 (Ordinance No. 175,236).*

<sup>12</sup> *Los Angeles City Planning Commission Determination Letter, Case No: CPC-2018-6005-CA, March 14, 2019.*

and La Brea Avenue on the west.<sup>13</sup> The Redevelopment Plan Map, included as Exhibit A.1 to the Redevelopment Plan, designates the Project Site for Regional Center Commercial land uses. This designation is consistent with the Community Plan's designation of Regional Center Commercial for the Project Site, as set forth by Section 502 of the Redevelopment Plan, which provides that "the land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time."

According to the Redevelopment Plan, Regional Center Commercial uses shall generally provide goods and services which are designed in a manner that appeals to a regional market as well as to local markets and includes uses such as theaters, restaurants, hotels, offices, and retail or service businesses.<sup>14</sup> Section 506.3 of the Redevelopment Plan also encourages the development of new and rehabilitated residential uses in the Regional Center Commercial Land Use designation. Development in the Regional Center Commercial designation is limited to an FAR of 4.5:1. However, new development may exceed the 4.5:1 FAR limitation to a maximum of 6:1 FAR if the development meets specific objectives set forth in Section 506.2.3 of the Redevelopment Plan, or as allowed by future amendments to the Community Plan, and the Project Applicant enters into a written agreement with the CRA/LA.

The Redevelopment Plan also establishes two special districts in the Regional Center Commercial designation: the Hollywood Boulevard District, and the Hollywood Core Transition District. As indicated on the Special Districts Map (Exhibit A.3), the Project Site is located in the Hollywood Boulevard District.<sup>15</sup> The Redevelopment Plan includes specific objectives for the Hollywood Boulevard District that focus on preserving and protecting historic structures, encouraging entertainment-themed development and activity, and promoting pedestrian accessibility. The Project's consistency with applicable policies in the Redevelopment Plan is analyzed under **Threshold (b)** on page IV.G-29.

*(d) Hollywood Signage Supplemental Use District*

The HSSUD was developed to provide the following: promote appropriate and economically viable signage; limit visual clutter by regulating the number, size, and location

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<sup>13</sup> CRA/LA, *A Designated Local Authority, Hollywood Project Area Overview*, [www.crala.org/internet-site/Projects/Hollywood/](http://www.crala.org/internet-site/Projects/Hollywood/), accessed February 21, 2019.

<sup>14</sup> *Community Redevelopment Agency of the City of Los Angeles, Hollywood Redevelopment Plan, as first amended on May 20, 2003 (Ordinance No. 175236)*.

<sup>15</sup> *Community Redevelopment Agency of the City of Los Angeles, Hollywood Redevelopment Plan, as first amended on May 20, 2003 (Ordinance No. 175236)*.

of signs; minimize potential traffic hazards and protect public safety; protect street views and scenic vistas of the Hollywood Sign and the Hollywood Hills; and protect and enhance major commercial corridors and properties. Last amended by Ordinance No. 181,340, the HSSUD promotes signage that uses clear attractive graphics; coordinates with the architectural elements of the building on which the signage is located; reflects a modern vibrant image of Hollywood as the global center of the entertainment industry; and complements and protects the character-defining features of historic buildings. Permitted signage types include architectural ledge signs, awning signs, digital displays, information signs, marquee signs, monument signs, open panel roof signs, pedestrian signs, pillar signs, projecting signs, and/or skyline logos/icons, as well as certain temporary signs. Billboards and pole signs are not permitted, though legally non-conforming signs that pre-date the HSSUD may remain. Maximum permitted sign areas are also specified. The Project's consistency with the HSSUD is provided below in Subsection 3.d(1)(c) on page IV.G-36 under **Threshold (b)**.

*(e) Citywide Design Guidelines*

The Citywide Design Guidelines implement the Framework Element's urban design principles and are intended to be used by City Planning Department staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards, and therefore do not supersede regulations in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and "flexibility is necessary and encouraged to achieve excellent design."<sup>16</sup>

The Citywide Design Guidelines are divided into three sections: residential; commercial; and industrial. Within each section are a number of design principles and measures that address the different elements of site and building design and environmental sensitivity based on land use. Each section of the Citywide Design Guidelines is organized by overarching objectives, followed by a list of specific implementation strategies. The Project's consistency with the objectives of the Citywide Design Guidelines is discussed below in Subsection 3.d.(1)(b) on page IV.G-29 under **Threshold (b)**.

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<sup>16</sup> Los Angeles Department of City Planning, *Commercial Citywide Design Guidelines*, July 2013, p. 5.

(f) *City of Los Angeles Walkability Checklist*

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. City Planning Department staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and community members to create enhanced pedestrian movement, access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.<sup>17</sup>

In the field of urban design, walkability is the measure of the overall walking conditions in an area. Different factors have been identified with regard to enhancing walkability in the private versus public realms. Specific factors influencing walkability within the private realm (project elements that are not within the public right-of-way) include building orientation, building frontages, signage and lighting, on-site landscaping, and off-street parking and driveways. Contributors influencing walkability within the public realm include sidewalks, crosswalks/street crossings, on-street parking, and utilities. Street connectivity, access to transit, aesthetics, landscaping, and street furniture are additional components that are discussed in the Walkability Checklist as they also influence the pedestrian experience.

The Framework Element's Urban Design Form and Neighborhood Design Chapter recognizes that areas and communities within the City include a variety of unique elements. Thus, the Framework Element's urban design principles should not be uniformly applied throughout the City. Similarly, not every Walkability Checklist guideline is appropriate for every project. The primary goal is to consider the applicable guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm.

The Project's consistency with applicable design guidelines in the Walkability Checklist is discussed below in Subsection 3.d.(1)(e) on page IV.G-38 under **Threshold (b)**.

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<sup>17</sup> *City of Los Angeles Department of City Planning, Walkability Checklist Guidance for Entitlement Review, November 2008.*

*(g) Transit Priority Area in the City of Los Angeles*

In September 2013, Governor Edmund G. “Jerry” Brown signed Senate Bill (SB) 743, which made several changes to CEQA for projects located in areas served by transit. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines the following:

- “Employment center project” means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.
- “Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- “Transit priority area” means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

As a proposed development project with an FAR in excess of 0.75 located on a commercially zoned infill development site, the Project is an employment center project that is located on an infill site. The Project Site is also located less than 0.5 mile from an existing major transit stop (i.e., the Metro Red Line’s Hollywood/Vine Station). Therefore, the Project Site is located in a TPA, as confirmed by the City’s Zone Information and Map Access System (ZIMAS) website. As such, the Project’s parking and aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. For informational purposes, Project characteristics related to parking and aesthetics are discussed in detail in Section IV.J, Transportation, and Section IV.A, Aesthetics, respectively, of this Draft EIR.

*(h) Other City of Los Angeles Policies, Ordinances, and Plans*

The City of Los Angeles has adopted various plans, policies, and ordinances, such as the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC); the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan; Los Angeles Department of Water and Power 2015 Urban Water Management Plan, Sustainable City pLAN; LA Green Plan/ClimateLA, and the City of Los Angeles Freeway Adjacent Advisory Area for Sensitive Uses. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR, and in the Initial Study prepared for the Project, which is included in Appendix A to this Draft EIR.

## **b. Existing Conditions**

### **(1) Project Site**

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is approximately 12,240 square feet, or 0.28 acre. The Project Site is currently occupied by a 6,393 square-foot low-rise commercial restaurant and nightclub building and adjacent paved surface areas. There are no open space areas, trees or landscaping on the Project Site. Two Jacaranda street trees are located outside of the property line along Vine Street. Currently, there are no driveways providing vehicular access to the Project Site.

As previously discussed and shown in Figure IV.G-1 on page IV.G-9, the current land use designation for the Project Site in the Community Plan is Regional Center Commercial. As shown in Figure IV.G-2 on page IV.G-10, the Project Site is currently zoned C4-2D-SN.

### **(2) Surrounding Uses**

As shown in the aerial photograph provided as Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is located in a highly urbanized area characterized by low-, mid-rise, and high-rise buildings that are occupied by office, commercial, residential, restaurant, and entertainment-related uses. Land uses surrounding the Project Site include: a surface parking lot and the Capitol Records Building to the north (designated Regional Center Commercial and zoned (T)(Q)C2-2-SN); the Pantages Theater to the east (designated Regional Center Commercial and zoned C4-2D-SN); the Equitable Building containing multi-family residential uses, the 33 TAPS Bar and Grill, and various other office and commercial uses to the south (designated Regional Center Commercial and zoned C4-2D-SN); and the Redbury Hollywood Hotel to the west across Vine Street (designated Regional Center Commercial and zoned C4-2D-SN).

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to land use if it would:

***Threshold (a): Physically divide an established community;***

***Threshold (b): Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect.***

For this analysis, the Appendix G thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G threshold questions. Specifically, the *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate land use:

*(a) Land Use Consistency*

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

*(b) Land Use Compatibility*

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

In assessing impacts related to land use in this section, the City will use the State CEQA Guidelines Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

## b. Methodology

The analysis of potential land use impacts considers the Project's potential to conflict with applicable plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

### (1) Physically Divide a Community

The intent of the analysis is to determine whether the Project would be compatible with surrounding uses in relation to use, size, intensity, density, scale, and other physical and operational factors. The analysis is intended to determine whether existing communities or land uses would be disrupted, divided, or isolated by the Project, with consideration given to the duration of any disruptions. The analysis is based on aerial photography, land use maps, and field surveys in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form based on a comparison of existing land use relationships in the vicinity of Project Site under existing conditions, at the time the Notice of Preparation of this Draft EIR was issued, to the conditions that would occur with Project implementation.

### (2) Conflict with Applicable Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

The determination of whether the Project conflicts with any applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect.<sup>18</sup> CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered consistent with the provisions and general policies of an applicable City or regional plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.<sup>19</sup> More specifically, according to the ruling in *Sequoiah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

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<sup>18</sup> *Such planning and zoning documents do not include those that simply establish objective planning and development standards (e.g., Los Angeles Zoning Code, Hollywood Redevelopment Plan, etc.), which were not adopted to mitigate or avoid an environmental effect*

<sup>19</sup> *Sequoiah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

## c. Project Design Features

No specific project design features related to land use are proposed beyond the Project improvements discussed in Section II, Project Description, of this Draft EIR.

## d. Analysis of Project Impacts

### ***Threshold (a): Would the Project physically divide an established community?***

As described in Section II, Project Description, of this Draft EIR, the Project would develop a hotel with 240 guest rooms approximately 2,742 square feet of guest amenities, and approximately 5,373 square feet of shared guest and public spaces. The building would have a maximum height of 185 feet and would consist of 13 above-ground levels (including a mechanical mezzanine level above Level 1) and five subterranean levels. As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A of this Draft EIR), the proposed hotel use is consistent with other land uses in the surrounding area. All proposed development would occur within the boundaries of the Project Site as it currently exists. The Project would not physically separate or otherwise disrupt an existing residential use on or adjacent to the Project Site. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. The Project would not be out of character with the surrounding area as the Project Site is located in a highly urbanized area characterized by a mixture of low-, mid-, and high-rise buildings occupied by a mix of commercial, residential, office, and entertainment-related uses. Furthermore, the simple, contemporary design of the Project would be substantially compatible with the existing historic character of the surrounding buildings. **Therefore, the Project would not physically divide, disrupt, or isolate an established community. Impacts would be less than significant.**

### ***Threshold (b): Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

#### (1) Consistency with Local Plans and Applicable Policies

As previously discussed, various local plans and regulatory documents guide development of the Project Site. The following discussion specifically addresses the Project's consistency with applicable goals, objectives, and policies of the General Plan, including the Framework Element, Conservation Element, and the Mobility Plan; the Community Plan; the Redevelopment Plan; the HSSUD; the Citywide Design Guidelines; and the Walkability Checklist that have been adopted for the purpose of avoiding or mitigating an environmental effect.

(a) *City of Los Angeles General Plan*

(i) *City of Los Angeles General Plan Framework Element*

The Project's general consistency with the applicable objectives, and policies set forth in the Land Use Chapter of the Framework Element is analyzed in Table IV.G-1 beginning on page IV.G-21.

Land Use Chapter

As detailed in Table IV.G-1, the Project would support and would be generally consistent with policies and objectives of the Land Use Chapter of the Framework Element that seek to avoid or mitigate environmental effects. The Project is located in a TPA with convenient access to public transit, bicycle facilities, and opportunities for walking, which would facilitate a reduction in vehicle trips and encourage pedestrian and bicycle activity.

In addition, the Project would create a more pedestrian-scaled project frontage along Vine Street by recessing the ground floor level and building entrance to provide space for an outdoor landscaped seating area adjacent to the Hollywood Walk of Fame. Furthermore, the Project would be developed on an existing site with adequate transportation and utility infrastructure, as well as access to public services. Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Land Use Chapter that seek to avoid or mitigate an environmental effect.

Urban Form and Neighborhood Design Chapter

The Project would be generally consistent with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element. Specifically, the Project Site is located on Vine Street within Hollywood's entertainment and commercial core and has convenient access to public transit. In addition, the Project would encourage pedestrian activity by creating a more active, pedestrian-friendly street frontage and improving the streetscape along Vine Street. These measures would serve to reduce VMT. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

The Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element. The Project is located within Hollywood's dense entertainment and commercial core and does not encroach on the City's natural resources. The Project would include an

**Table IV.G-1  
Applicable Goals, Objectives, and Policies of the Framework Element**

Objective/Policy	Would the Project Conflict?
<b>Land Use Chapter</b>	
<p><b>Goal 3A:</b> A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</p>	<p><b>No Conflict.</b> The Project is located within Hollywood's dense entertainment and commercial core and in close proximity to multiple public transit options provided by Metro and the City of Los Angeles Department of Transportation (LADOT), which would reduce traffic congestion and improve air quality through a reduction in vehicles traveling to the Project Site. Furthermore, as detailed in the Initial Study prepared for the Project which is included in Appendix A to this Draft EIR, in Section IV.I. Public Services—Fire Protection, in Section IV.K, Utilities and Service Systems—Water Supply and Infrastructure, and in Section IV.D, Energy, of this Draft EIR, the agencies that provide public infrastructure and services to the Project Site would have adequate infrastructure and capacity to serve the Project. Thus, the Project would contribute to the achievement of a more livable City.</p>
<p><b>Policy 3.1.2:</b> Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p><b>No Conflict.</b> As detailed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, in Section IV.I. Public Services—Fire Protection, in Section IV.L.1, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, and in Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this policy.</p>
<p><b>Policy 3.1.3:</b> Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.</p>	<p><b>No Conflict.</b> The Project would not conflict with the City's goal of establishing new open space opportunities. As discussed in Section II, Project Description, of this Draft EIR, the Project would provide publicly accessible, urban open space including an outdoor plaza at ground level and terraces on Level 13. Landscaping would include large planters containing a mix of trees and shrubs, which would be provided within the outdoor seating area at the Project frontage and the Level 13 terraces. Plant materials would be drought-tolerant and native to Los Angeles, where feasible.</p>
<p><b>Objective 3.2:</b> Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p><b>No Conflict.</b> The Project does not conflict with this City objective. The Project is located within Hollywood's entertainment and commercial core and is in close proximity to a variety of neighborhood-serving retail, restaurant, and entertainment-related uses, including popular tourist destinations. The Project has convenient access to a variety of public transportation options and is served by the Metro Red Line subway, as well as several bus lines operated by Metro and LADOT. The closest Metro rail station is the Hollywood/Vine Station, located</p>

**Table IV.G-1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the Framework Element**

Objective/Policy	Would the Project Conflict?
	less than 300 feet south of the Project Site. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled and an associated reduction in air pollution.
<b>Policy 3.2.3:</b> Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	<b>No Conflict.</b> The Project would support this City policy through the provision of short- and long-term bicycle parking in accordance with LAMC requirements. A total of 72 bicycle parking spaces would be provided. Pursuant to the LAMC, the provision of these required bicycle parking spaces permits a reduction in the number of required vehicular parking spaces. Furthermore, the Project would enhance the streetscape adjacent to the Project Site by providing an outdoor seating area, large planters, and a publicly-accessible coffee bar located near the entrance of the hotel, which would promote pedestrian activity.
<b>Objective 3.3:</b> Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	<b>No Conflict.</b> As detailed in the Initial Study prepared for the Project, which is included in Appendix A to this Draft EIR, the Project does not propose the development of residential dwelling units, and the construction and operation of the Project is not expected to have a significant increase in the number of employees. Therefore, population and employment growth would be well within SCAG's projections for the Los Angeles Subregion, which serve as the basis for the General Plan Framework's demographics projections and planned provisions of transportation and utility infrastructure and public services. In addition, as discussed in Section IV.I, Public Services—Fire, Section IV.L.1, Utilities and Service Systems—Energy Infrastructure, Section IV.L.2, Utilities—Water Supply and Infrastructure, , as well as the Initial Study included in Appendix A to this Draft EIR, the agencies that provide services and utilities to the Project Site would have adequate capacity to serve the Project.
<b>Urban Form and Neighborhood Design Chapter</b>	
<b>Objective 5.2:</b> Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	<b>No Conflict.</b> The Project is located on Vine Street within Hollywood's entertainment and commercial core and is in close proximity to a variety of neighborhood-serving retail, restaurant, and entertainment-related uses, including popular tourist destinations. The Project has convenient access to a variety of public transportation options and is served by the Metro Red Line, as well as several bus lines operated by Metro and LADOT. The closest Metro Red Line rail station is the Hollywood/Vine Station, located less than 300 feet south of the Project Site. The Project would contribute to the diversity of uses within the Project vicinity and develop a new hotel use that would support the needs of visitors, tourists, and business travelers.

**Table IV.G-1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the Framework Element**

Objective/Policy	Would the Project Conflict?
<b><i>Open Space and Conservation Chapter</i></b>	
<b>Objective 6.1:</b> Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	<b>No Conflict.</b> The Project is located on an infill, previously developed lot within Hollywood's dense entertainment and commercial core and does not encroach on the City's natural resources.
<b>Objective 6.2:</b> Maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.	<b>No Conflict.</b> The Project supports this City policy through the inclusion of an outdoor seating area adjacent to the Hollywood Walk of Fame and the building entrance. Outdoor terraces on Level 13 for hotel guest and public use are also proposed. Landscaping would include large planters containing a mix of trees and shrubs, which would be provided within the outdoor seating area at the Project frontage and the Level 13 terraces. Plant materials would be drought-tolerant and native to Los Angeles, where feasible.
<b>Policy 6.4.8:</b> Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.	<b>No Conflict.</b> See discussion regarding Objective 6.2 above.
<b><i>Economic Development Chapter</i></b>	
<b>Objective 7.2:</b> Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	<b>No Conflict.</b> The Project would construct a hotel with 240 hotel rooms and a "living room" concept with lounge seating and a limited service food and beverage bar called "canteenM," which would provide lodging and dining options that would support the needs of local visitors, tourists, and business travelers to the Hollywood area. The Project would result in new employment opportunities during construction and operation, thereby contributing to the economic growth of the Hollywood community. The Project Site would have convenient access to public transit and opportunities for walking and biking, which would reduce vehicle miles traveled and air pollution to ensure maximum feasible environmental quality. The Project would also incorporate sustainability features capable of achieving Silver certification under the U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED®) v4 Rating System.
<b>Policy 7.2.2:</b> Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	<b>No Conflict.</b> The Framework Element's Long Range Land Use Diagram and the Community Plan designate the Project Site as Regional Center and Regional Center Commercial, respectively. The Project is an infill development project that would construct a new hotel on a Project Site that is zoned for commercial uses and adjacent to other commercial uses. Thus, the Project would not encroach upon existing residential

**Table IV.G-1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the Framework Element**

Objective/Policy	Would the Project Conflict?
	neighborhoods. The Project Site is located on Vine Street within an area well-served by public transit, including the Metro Red Line, as well as several bus lines operated by Metro and LADOT. The closest Metro rail station is the Hollywood/Vine Station, located less than 300 feet south of the Project Site.
<b>Policy 7.2.3:</b> Encourage new commercial development in proximity to rail and bus transit corridors and stations.	<b>No Conflict.</b> See the consistency analysis for Policy 7.2.2.
<b>Infrastructure and Public Services Chapter</b>	
<b>Policy 9.3.1:</b> Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	<b>No Conflict.</b> The Project would support this City policy through compliance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which requires the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. The Project would also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Thus, Best Management Practices (BMPs) would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The treatment method proposed for the Project Site is the implementation of High Efficiency Biofiltration Systems (flow-through planters) to manage stormwater runoff in accordance with current LID requirements. With implementation of the required BMPs, impacts to water quality during operation would be less than significant. Thus, the Project would reduce the amount of hazardous substances and total amount of flow entering the wastewater system.
<b>Objective 9.6:</b> Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	<b>No Conflict.</b> Refer to Policy 9.3.1 above.
<b>Objective 9.10:</b> Ensure that water supply, storage, and delivery systems are adequate to support planned development.	<b>No Conflict.</b> As evaluated in Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would be within the Los Angeles Department of Water and Power's (LADWP) current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and no system upgrades would be required as a result of the Project.
<b>Objective 9.40:</b> Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for	<b>No Conflict.</b> Project lighting would include exterior lighting along the public areas; low-level exterior lights adjacent to buildings and along pathways for security and

**Table IV.G-1 (Continued)  
Applicable Goals, Objectives, and Policies of the Framework Element**

Objective/Policy	Would the Project Conflict?
private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	wayfinding purposes; and low-level lighting to accent signage, architectural features, and landscaping elements. Project lighting would minimize light trespass from the Project Site. All on-site exterior lighting would be automatically controlled to illuminate only when necessary and would be shielded or directed toward areas to be illuminated. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting to ensure that the Project is consistent with this goal.
<b>Policy 9.40.3:</b> Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	<b>No Conflict.</b> While this is a citywide goal, the Project would not conflict with such regulations. Please see discussion regarding Objective 9.40 above.
<hr/> <p><i>Source: Eyestone Environmental, 2019.</i></p>	

outdoor landscaped seating area adjacent to the Hollywood Walk of Fame, a popular outdoor destination, as well as outdoor terraces on Level 13 for hotel guest and public use. Landscaping would include large planters containing a mix of trees and shrubs, which would be provided within the outdoor seating area at the Project frontage and the Level 13 terraces. Plant materials would be drought-tolerant and native to Los Angeles, where feasible. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element’s Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

**Economic Development Chapter**

The Project would be consistent with the relevant objectives and policies that support the goals of the Economic Development Chapter of the Framework Element. Specifically, the Project would provide lodging and dining options that would support the needs of visitors, tourists, and business travelers to the Hollywood area and would have convenient access to public transit and opportunities for walking and biking, which would reduce vehicle miles traveled and air pollution to ensure maximum feasible environmental quality. The Project would also incorporate sustainability features capable of achieving Silver certification under the USGBC’s LEED® v4 Rating System. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the

goals set forth in the Framework Element's Economic Development Chapter that seek to avoid or mitigate an environmental effect.

### Infrastructure and Public Services Chapter

The Project would be consistent with the relevant goals, objectives, and policies of the Infrastructure and Public Services Chapter of the Framework Element. Specifically, the Project would comply with the City's grading permit regulations, which require the preparation of an erosion control plan. The Project would also be required to comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. As evaluated in Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would be within LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site and no system upgrades would be required as a result of the Project. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

Based on the analysis above, the Project would be generally consistent with the relevant goals, objectives, and policies of the Framework Element.

### *(ii) City of Los Angeles General Plan Conservation Element*

As noted above, the City's Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. As discussed in the Initial Study, included as Appendix A, and in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would have no impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project would implement mitigation measures to reduce potential impacts to archaeological resources, and as discussed in Section IV.E, Geology and Soils, would implement mitigation to reduce potential impacts to paleontological resources. As analyzed in Section IV.A, Aesthetics, of this Draft EIR, the Project would obstruct existing public views of the north elevation of the Equitable Building. Thus, while not resulting in any impact due to the provisions of SB 743, the Project would not be fully consistent with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. Nonetheless, the Project would be

fully consistent with multiple other conservation objectives and policies, and would therefore be substantially consistent with the Conservation Element.

*(iii) Mobility Plan 2035*

The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan that seek to avoid or mitigate an environmental effect, as detailed in Table IV.G-2 beginning on page IV.G-28. The Project supports the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce congestion to public streets. The Project recognizes all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. In addition, the Project's proximity to a variety of public transit options would provide all residents, workers, and visitors convenient access to public transit services. Furthermore, the Project would promote the City's policies to reduce vehicle trips through the implementation of a Transportation Demand Management (TDM) Program that would outline measures to promote non-auto travel and reduce the use of single-occupant vehicle trips. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

*(iv) Hollywood Community Plan*

As previously discussed, the Project Site is currently designated for Regional Center Commercial land uses by the Community Plan. The Project's general consistency with the objectives and policies set forth in the Hollywood Community Plan is analyzed in Table IV.G-3 beginning on page IV.G-30. As discussed therein, the Project would be generally consistent with the objectives and policies that support the goals of the Community Plan that have been adopted to avoid or mitigate an environmental effect. Specifically, the Project would be located in close proximity to a variety of neighborhood-serving retail, restaurant, and entertainment-related uses, including popular tourist destinations. The Project Site would have convenient access to a variety of public transportation options, including the Metro Red Line, as well as several bus lines operated by Metro and LADOT.

As discussed in Section IV.I, Public Services-Fire, Section IV.L.1, Utilities and Service Systems—Energy Infrastructure, and Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, as well as the Initial Study included in Appendix A to this Draft EIR, the agencies that provide public services and utilities to the Project Site would have adequate capacity to serve the Project. As such, the Project would support the City's objectives and policies for ensuring that public services

**Table IV.G-2  
Applicable Policies of the Mobility Plan 2035**

Policy	Analysis of Project Consistency
<p><b>Policy 1.6:</b> Design detour facilities to provide safe passage for all modes of travel during times of construction.</p>	<p><b>No Conflict.</b> During construction of the Project, the majority of construction activities would be anticipated to be confined on-site. However, limited construction activities may be needed on adjacent right-of-ways. As part of Project Design Feature TR-PDF-1 provided in Section IV.J, Transportation, of this Draft EIR, the Project would prepare and implement a Construction Management Plan that would reduce construction-related impacts on the surrounding community. The Construction Management Plan would include safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce congestion to public streets.</p>
<p><b>Policy 2.3:</b> Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p><b>No Conflict.</b> The Project would encourage walking by creating a more pedestrian-scaled project frontage along Vine Street by recessing the ground floor level and building entrance to provide space for an outdoor landscaped seating area. The outdoor seating and glass entryway are intended to connect the Project to the street and draw pedestrians into the building, which would activate and enhance the streetscape along this portion of Vine Street, which includes a portion of the Hollywood Walk of Fame. Landscaping would include large planters containing a mix of trees and shrubs, which would be provided within the outdoor seating area at the Project frontage and the Level 13 terraces. Plant materials would be drought-tolerant and native to Los Angeles, where feasible.</p>
<p><b>Policy 3.1:</b> Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.</p>	<p><b>No Conflict.</b> The Project would support this City policy by providing safe, clearly defined access pathways to the Project for pedestrians, bicyclists, and motorists. In addition, the Project is located in an area well-served by the Metro Red Line, as well as several bus lines operated by Metro and LADOT. The closest Metro rail station is the Hollywood/Vine Station, located less than 300 feet south of the Project Site.</p>
<p><b>Policy 3.3:</b> Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p><b>No Conflict.</b> The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new hotel use located in a highly urbanized area surrounded by a mix of neighborhood-serving commercial uses, residential uses, entertainment-related uses, and popular tourist destinations.</p>
<p><b>Policy 4.8:</b> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.</p>	<p><b>No Conflict.</b> As discussed in Section IV.J, Transportation, of this Draft EIR, the Project Applicant would implement a TDM Program, which would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips.</p>

**Table IV.G-2 (Continued)**  
**Applicable Policies of the Mobility Plan 2035**

Policy	Analysis of Project Consistency
<b>Policy 5.2:</b> Support ways to reduce vehicle miles traveled (VMT) per capita.	<b>No Conflict.</b> The Project supports this City policy by locating in an area well-served by public transit. In addition, the Project would encourage pedestrian activity and provide bicycle facilities on the Project Site. Furthermore, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips.
<hr/> <i>Source: Eyestone Environmental, 2019.</i>	

and utilities are adequate to support development in the Hollywood community. Furthermore, the Project would support the City's objectives and policies for ensuring a circulation system adequate to accommodate traffic by siting the proposed hotel on an infill site in an area that is well-served by public transit provided by Metro and LADOT and implementing a TDM Program to mitigate traffic impacts. Therefore, the Project would be generally consistent with the applicable objectives and policies set forth in the Hollywood Community Plan.

*(b) Community Redevelopment Agency of Los Angeles (CRA/LA) Hollywood Redevelopment Plan*

The Project Site is currently designated for Regional Center Commercial land uses by both the Community Plan and the Redevelopment Plan. According to the Redevelopment Plan, Regional Center Commercial uses shall generally provide goods and services which are designed in a manner that appeals to a regional market as well as to local markets and includes uses such as theaters, restaurants, hotels, offices, and retail or service businesses. Thus, the hotel use proposed by the Project would be consistent with the existing Regional Center Commercial land use designation.

Development in the Regional Center Commercial designation is limited to a base FAR of 4.5:1. However, new development may exceed the 4.5:1 FAR limitation, up to a maximum of 6:1 FAR, if the development meets specific objectives set forth in Section 506.2.3 of the Redevelopment Plan, and if the project proponent enters into a binding written agreement with the CRA/LA (or appropriate successor agency) that ensures that the proposed development will occur in conformity with the Redevelopment Plan. Specifically, Section 506.2.3 permits the increased FAR "provided that the proposed development further the goals and intent of this Plan and the Community Plan and meets Objective (a) and at least one other objective listed below:

**Table IV.G-3  
Applicable Objectives and Policies of the Hollywood Community Plan**

Objective/Policy	Would the Project Conflict?
<p><b>Objective 5.</b> To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.</p>	<p><b>No Conflict.</b> As detailed in the Initial Study prepared for the Project, which is included in Appendix A to this Draft EIR, and in Section IV.I. Public Services—Fire Protection, Section IV.L.1, Energy Conservation and Infrastructure, and Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the agencies that provide public infrastructure, and services to the Project Site would have adequate infrastructure and adequate capacity to serve the Project. In addition, the Project would provide a ground-level outdoor landscaped seating area and outdoor terraces on Level 13. Landscaping would include large planters containing a mix of trees and shrubs, which would be provided within the outdoor seating area at the Project frontage and the Level 13 terraces. Plant materials would be drought-tolerant and native to Los Angeles, where feasible.</p>
<p><b>Objective 6.</b> To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.</p>	<p><b>No Conflict.</b> While this is a community-wide objective, the Project would nevertheless support its implementation. Specifically, the Project Site is located in a highly urbanized area that is well-served by public transit options provided by Metro and LADOT. The Project would provide approximately 72 short- and long-term bicycle parking spaces, in accordance with the LAMC. In addition, as discussed in Section IV.J, Transportation, of this Draft EIR, all traffic impacts resulting from the Project would be mitigated by a combination of TSM improvement funding and implementation of a TDM program.</p>
<p><b>Objective 7.</b> To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.</p>	<p><b>No Conflict.</b> The Project would not adversely affect any open space or natural features, and as discussed in Section IV.A, Aesthetics, of this Draft EIR, the Project's impacts on views would not be considered significant.</p>
<b>Circulation</b>	
<p>No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated.</p>	<p><b>No Conflict.</b> The Project seeks a zone change from C4-2D-SN to (T)(Q)C4-2D-SN to allow a maximum FAR of 6:1 in order to construct a 240-room, 13-story hotel building with a maximum height of 185 feet. The Project is conveniently located near a variety of public transportation options and is well-served by the Metro Red Line, as well as several bus lines operated by Metro and LADOT. In addition, as discussed in Section IV.J, Transportation, of this Draft EIR, all potential traffic impacts resulting from the Project would be mitigated by a combination of funding of TSM improvements and implementation of a TDM program.</p>

**Table IV.G-3 (Continued)**  
**Applicable Objectives and Policies of the Hollywood Community Plan**

Objective/Policy	Would the Project Conflict?
<b>Service System</b>	
Such development shall be sequenced and timed to provide a workable, efficient, and adequate balance between land use and service facilities at all times.	<b>No Conflict.</b> The Project Site is located in an urbanized area with established service facilities. As discussed in Section IV.I, Public Services-Fire, Section IV.L.1, Utilities and Service Systems—Energy Infrastructure, and Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and in the Initial Study included in Appendix A to this Draft EIR, the Project would not require the construction of utility infrastructure and the Project would not conflict with this objective. In addition, in-lieu fee payments and compliance with regulatory requirements would ensure adequate capacity to service facilities.
No increase in density shall be effected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development.	<b>No Conflict.</b> The Project is seeking a zone change from C4-2D-SN to (T)(Q)C4-2D-SN to allow a maximum FAR of 6:1 in lieu of 3:1. The Project Site is located in an urbanized area with established public service facilities and utilities. As discussed in Section IV.I, Public Services-Fire, Section IV.L.1, Utilities and Service Systems—Energy Infrastructure, and Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and in the Initial Study included in Appendix A to this Draft EIR, the Project would not result in significant impacts to public services and utilities. In addition, compliance with regulatory measures would ensure that public services and utilities would have adequate capacity to service the Project.
<hr/> <p><i>Source: Eyestone Environmental, 2019.</i></p>	

- a) to concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs;
- b) to provide for new development which compliments [sic] the existing buildings in areas having architecturally and/or historically significant structures or to encourage appropriate development in areas that do not have architecturally and/or historically significant buildings;
- c) to provide focal points of entertainment, tourist or pedestrian oriented uses in order to create a quality urban environment;
- d) to encourage the development of appropriately designed housing to provide a balance in the community;

- e) to provide for substantial, well designed, public open space in the Project Area; and
- f) to provide social services or facilities for social services which address the community's needs."

Furthermore, to approve an agreement permitting development in excess of 4.5:1 FAR, the CRA/LA must make the following findings and determinations:

- 1) The proposed development conforms with the provisions and goals of the Redevelopment Plan and any applicable Design(s) for Development or requirements of the Hollywood Boulevard District or Hollywood Core Transition District.
- 2) Permitting the proposed development serves a public purpose objective such as: the provision of additional open space, cultural facilities, public parking, or the rehabilitation of an architecturally or historically significant building.
- 3) Any adverse environmental effects especially impacts upon the transportation and circulation system of the area caused by proposed development shall be mitigated or are overridden by other social, economic or physical considerations, and statements of findings are made.

The Project would result in approximately 73,440 square feet of new floor area and a FAR of 6:1 and would exceed the base allowable FAR of 4.5:1 under the Redevelopment Plan's Regional Center Commercial designation. Therefore, the Project is requesting a Vesting Zone/Height District Change from C4-2D-SN to (T)(Q)C4-2D-SN to allow for a FAR of 6:1, along with a binding written agreement with the CRA/LA or appropriate successor agency to allow FAR in excess of 4.5:1. The Project would meet Objectives (a), (b), and (c) set forth in Section 506.2.3 of the Redevelopment Plan. Therefore, the Project would be consistent with Section 506.2.3 of the Redevelopment Plan and would be allowed to exceed the 4.5:1 FAR limitation to a maximum FAR of 6:1.

Specifically, the Project is located less than 300 feet north of the Metro Red Line Hollywood/Vine Station and along Vine Street. The Project would also implement a TDM Program and fund TSM improvements to mitigate all traffic impacts to meet Objective (a). The Project would integrate the design of the proposed hotel building with the existing historic structures through the use of similar materials, massing, and form to meet Objective (b). The simple, contemporary design of the Project would be substantially compatible with the existing historic character of the surrounding buildings such as the Equitable Building and the Capitol Records Building. In addition, the maximum height of 185 feet for the proposed 13-story hotel would be generally consistent with the height of the

13-story Capitol Records Building and the 12-story Equitable Building. Furthermore, the Project will create a more pedestrian-scaled project frontage along Vine Street by recessing the ground floor level and building entrance to provide space for an outdoor landscaped seating area to meet Objective (c). Due to the Project's consistency with these objectives, the CRA/LA can make the required findings for the written agreement to allow the Project's FAR in excess of 4.5:1, as further explained below.

- 1) The Project conforms with the provisions and goals set forth in the Redevelopment Plan and the objectives for the Hollywood Boulevard District, as analyzed in Table IV.F-1 beginning on page IV.G-34. As discussed therein, the Project would meet the needs of the residential, commercial, arts and entertainment sectors by providing lodging and dining options within Hollywood's commercial and entertainment core for visitors, tourists, and business travelers. There are no adopted Designs for Development or supplemental requirements of the Hollywood Boulevard District or Hollywood Core Transition District.
- 2) Permitting the proposed development would serve a public purpose objective, because the Project would create new employment opportunities during construction and operation of the Project, including employment opportunities in the hotel industry. The Project would also support and encourage all modes of travel, including pedestrian, bicycle, vehicle, and public transit systems by enhancing pedestrian access, installing streetscape improvements, and providing 79 vehicular parking spaces and 72 bicycle parking spaces. Hotel guests and visitors would also have convenient access to public transit options provided by Metro and LADOT. Furthermore, the Project would ensure that new development is sympathetic to, and complements the existing scale of the area by constructing a contemporary building that is compatible in form, height, and materials to the existing historic buildings adjacent to the Project Site.
- 3) As described throughout Section IV, Environmental Impact Analysis, of this Draft EIR, while the Project would produce temporary and intermittent noise and vibration impacts during construction, it would not result in any long-term or permanent significant adverse environmental impacts. Moreover, as described in Section IV.J, Transportation, of this Draft EIR, the Project would not result in any significant impacts upon the transportation system of the area.

Based on the analysis above and the analysis of the Project's consistency with the applicable goals of the Hollywood Redevelopment Plan and objectives of the Hollywood Boulevard District, the Project would be consistent with the Redevelopment Plan.

**Table IV.F-1  
Project Consistency with Applicable Goals and Objectives of the Hollywood Redevelopment Plan**

Goals/Objectives	Analysis of Project Consistency
<p><b>Goal 3:</b> Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.</p>	<p><b>Consistent.</b> The Project would develop a hotel that includes 240 short-term overnight hotel rooms and a limited service food and beverage bar called “canteenM,” which would provide lodging and dining options for local visitors, tourists, and business travelers. Furthermore, the Project would create new employment opportunities during construction and operation of the Project, including employment opportunities in the hotel industry. Thus, providing a diversity of uses within Hollywood’s commercial and entertainment core that would meet the needs of the residential, commercial, and entertainment sectors.</p>
<p><b>Goal 5:</b> Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; and g) promoting rehabilitation and restoration guidelines.</p>	<p><b>Consistent.</b> While directed to the CRA/LA and not individual development projects, the Project would be consistent with this goal, as it would develop a 13-story hotel building that would generally be compatible with the height and massing of the historic 13-story Capitol Records Building and the 12-story Equitable Building. The Project would provide a 14-foot easterly rear yard setback above Level 2, and a 15-foot southerly side yard setback to reduce the perceived massing and scale of the building and minimize impacts to the Pantages Theatre and the Equitable Building. The clean, contemporary design of the proposed building would complement the various architectural styles of the surrounding buildings. The Project would utilize materials and elements to create an architecturally distinct building that would visually integrate the Project with the surrounding historic buildings. In addition, the Project’s mechanical equipment would be located below-grade and at the building’s rooftop, behind a screen that will conceal the equipment from public view.</p>
<p><b>Goal 6:</b> Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development and expansion of all sectors of the entertainment industry and the preservation of landmarks related to the entertainment industry.</p>	<p><b>Consistent.</b> The Project will support the retention, development and expansion of the entertainment industry by providing new lodging and dining opportunities in Hollywood, in close proximity to existing and proposed entertainment industry offices and production facilities.</p>
<p><b>Goal 11:</b> Recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria</p>	<p><b>Consistent.</b> As described in Section IV.C, Cultural Resources, of this Draft EIR, while the Project Site does not contain any historic resources, the Equitable Building, Pantages Theater, and Capitol Records Building are three historic resources in close proximity to the Project Site. The 13-story height of the Project is generally compatible with the height and massing of the 13-story Capitol Records Building and the 12-story Equitable Building. Furthermore, The Project would integrate the design of the proposed building with the existing historic structures by using similar materials, massing, and form. The simple, contemporary design of the Project would be</p>

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Goals and Objectives of the Hollywood Redevelopment Plan**

Goals/Objectives	Analysis of Project Consistency
	substantially compatible with the existing historic character of the surrounding buildings and would not create any significant impacts on nearby historic resources.
<p><b>Goal 12:</b> Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.</p>	<p><b>Consistent.</b> The Project Site is located on Vine Street within an area well-served by public transit, including the Metro Red Line, as well as several bus lines operated by Metro and LADOT. The closest Metro rail station is the Hollywood/Vine Station, located less than 300 feet south of the Project Site. The Project would provide streetscape improvements adjacent to the Project Site, including an outdoor landscaped seating area to enhance the pedestrian environment and encourage walkability. The Project would also provide 79 vehicular parking spaces within five levels of subterranean parking and 72 bicycle parking spaces. Therefore, the Project would support and encourage all modes of travel, including pedestrian, bicycle, vehicle, and public transit systems, thereby reducing VMT.</p>
<b>Hollywood Boulevard District</b>	
<p><b>Objective 2:</b> Ensure that new development is sympathetic to and complements the existing scale of development.</p>	<p><b>Consistent.</b> The proposed 13-story hotel building would generally compatible with the height and massing of the historic 13-story Capitol Records Building and the 12-story Equitable Building. The Project would provide a 14-foot easterly rear yard setback above Level 2, and a 15-foot southerly side yard setback to reduce the perceived massing and scale of the building and minimize impacts to the Pantages Theatre and the Equitable Building. The clean, contemporary design of the proposed building would complement the various architectural styles of the surrounding buildings. The Project would utilize materials and elements to create an architecturally distinct building that would visually integrate the Project with the surrounding historic buildings. Proposed building materials would include painted concrete, aluminum, glass, and metal.</p>
<p><b>Objective 4:</b> Encourage entertainment, theater and tourist related uses.</p>	<p><b>Consistent.</b> The Project would construct a 13-story hotel which would provide 240 short-term, overnight hotel rooms within Hollywood's commercial and entertainment core for visitors, tourists, and business travelers.</p>
<p><b>Objective 5:</b> Provide adequate parking for new and existing uses.</p>	<p><b>Consistent.</b> As discussed in Section II, Project Description, of this Draft EIR, the Project would provide 79 vehicular parking spaces within five subterranean levels of parking, accounting for permitted reductions for providing adequate bicycle parking in accordance with LAMC Section 12.21.A.16 as well as a further permitted reduction in parking requirements in connection with a legislative land use ordinance (i.e., the Project's requested</p>

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Goals and Objectives of the Hollywood Redevelopment Plan**

Goals/Objectives	Analysis of Project Consistency
	zone and height district change) pursuant to LAMC Section 12.32 P. All vehicular parking would be valet only.
<b>Objective 6:</b> Reinforce and enhance the existing pedestrian environment.	<b>Consistent.</b> The Project would provide streetscape improvements adjacent to the Project Site, including an outdoor landscaped seating area and an enhanced Project frontage and entryway. Landscaping would be provided at the building entrance and within the outdoor seating area, and would include a mix of trees, shrubs, and large planters. Plant materials would be drought-tolerant and native to Los Angeles, where feasible.
<hr/> <p><i>Source: Eyestone Environmental, 2019.</i></p>	

*(c) Hollywood Signage Supplemental Use District*

The Project would not include any of the types of signs that are prohibited in the HSSUD pursuant to Ordinance No. 181,340. No on- or off-site signage would be included as part of the proposed original art murals. Furthermore, the Project would comply with the design standards for specific types of signs set forth in Ordinance No. 181,340, including, but not limited to, standards related to location, dimensions, area, height, spacing, and materials. Therefore, the Project would be generally consistent with the applicable signage requirements in the HSSUD.

*(d) Citywide Design Guidelines*

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As discussed below, the Project would not conflict with the six objectives of the Citywide Design Guidelines which serve to reduce the number of vehicle miles traveled.

**Objective 1: Consider Neighborhood Context and Linkages in Building and Site Design.**

The Project Site is located in an area that is highly urbanized, visually eclectic, and lacks a consistent visual character and cohesive theme. The hotel use proposed for the Project Site is substantially compatible with the surrounding uses, which include the Redbury Hollywood Hotel located adjacent to the Project Site, and the W Hotel, located approximately 300 feet to the south across Hollywood Boulevard. Currently, the Project

Site is occupied with a two-story commercial building and paved surface areas. The Project would construct a hotel development on an infill site, which would result in a more cohesive and vibrant street environment along Vine Street when compared to the existing conditions. The Project would create a strong street wall along Vine Street by locating the building at the front property line. To create a more inviting and pedestrian friendly environment, the ground floor level of the building would be recessed to provide space for an outdoor landscaped seating area. The outdoor seating and glass entryway are intended to connect the Project to the street and draw pedestrians into the building, which would activate and enhance the streetscape along this portion of Vine Street.

**Objective 2: Employ High Quality Architecture to Define the Character of the Commercial Districts.**

As depicted in Figure IV.A-3 through Figure IV.A-7 and discussed in Section IV.A, Aesthetics, the Project would be designed in a contemporary architectural style that would complement the existing historic buildings surrounding the Project Site. The building fenestration on the east and west elevations would exhibit a simple, clean cellular pattern that is articulated by the painted aluminum window frames. The south elevation would be characterized by a recessed vertical light court. The north elevation would be a solid wall and would not have any openings, but would feature an original art mural. Mechanical equipment would be located on the northern portion of the building roof and setback to minimize the view from Vine Street. In addition, the mechanical equipment would be wrapped in 20-foot tall metal mesh to screen mechanical equipment from public view. Building materials would include painted concrete, aluminum, metal, and glass.

**Objective 3: Augment the Streetscape with Pedestrian Amenities.**

The Project would activate and enhance the streetscape adjacent to the Project Site by providing an outdoor landscaped seating areas and glass entryway, which are intended to connect the Project to the street and draw pedestrians into the building. Landscaping would be provided at the building entrance and outdoor seating area, and would include a mix of trees, shrubs, and large planters. Plant materials would be drought-tolerant and native to Los Angeles, where feasible.

**Objective 4: Minimize the Appearance of Driveways and Parking Areas.**

Project parking would be located within five subterranean levels and would not be visible to the public. The Project would provide a single two-way driveway off of Vine Street that would be integrated with the Project street frontage and lead to the subterranean parking levels.

**Objective 5: Include Open Space to Create Opportunities for Public Gathering.**

As previously described, the Project would include an outdoor seating area at the front entrance of the hotel building and outdoor terraces on Level 13 that create opportunities for public gathering.

**Objective 6: Improve the Streetscape by Reducing Visual Clutter.**

The Project would include landscaping and enhanced streetscape to serve as an accent to the overall design of the Project while ensuring adequate spacing and scale. Project signage would be designed to be aesthetically compatible with the types of signage and uses within the community and would include a monument sign located adjacent to the Project entrance. The Project would include low-level exterior lights adjacent to the proposed building for security and wayfinding purposes and would avoid unnecessary lighting fixtures. Low-level accent lighting to highlight architectural features, landscape elements, and the Project's signage would also be incorporated. As provided in Project Design Feature AES-PDF-7 in Section IV.A, Aesthetics, all new street and pedestrian outdoor lighting would be shielded and directed towards the interior of the Project Site such that the light source does not project directly upon any adjacent property. In addition, as provided in Project Design Features AES-PDF-4 through AES-PDF-6 in Section IV.A, Aesthetics, all major utilities would be placed underground and all equipment and trash areas would be required to be screened from public view.

*(e) City of Los Angeles Walkability Checklist*

As previously indicated, the Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The guidelines address the following topics, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting.

The Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist, and would implement a number of relevant design elements in order to foster a vibrant and visually appealing pedestrian environment. The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. Recommended implementation strategies that would be incorporated into the Project include: creating a continuous and predominantly straight sidewalk; providing adequate sidewalk widths; and

creating a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (i.e., bicycle racks, planters, benches).

The Walkability Checklist strategies regarding crosswalks and street crossings do not apply to the Project because no internal roadways are located or proposed within the Project Site, and the Project does not propose any changes to existing crosswalks or street crossings within public rights-of-way.

The Walkability Checklist strategies regarding on-street parking do not apply to the Project because no internal roadways are located or proposed within the Project Site. Furthermore, the Project would include five levels of subterranean parking with 79 vehicular parking spaces to provide parking for the hotel in accordance with the vehicular parking requirements of the LAMC.

The objective of the utilities section is to minimize the disruption of views and visual pollution created by utility lines and equipment. The Project would screen rooftop equipment and locate trash enclosures within the hotel building so as not to detract from the visual character of the Project Site. In addition, all major utilities would be installed underground. Utilities would also be located away from building entrances. As such, the Project would support the implementation strategies related to the undergrounding and screening of utilities.

Within the Walkability Checklist, building orientation addresses the relationship between building and street as a means of improving neighborhood character and the pedestrian environment. Recommended implementation strategies that would be incorporated into the Project include: a grade level entrance from the public right-of-way to the hotel for pedestrians; a primary entrance to the hotel that is visible from the street and sidewalk; complying with Americans with Disabilities Act (ADA) guidelines at primary pedestrian entrances; and locating hotel at the front property line to create a strong street wall.

In terms of off-street parking and driveways, the primary objective is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include: maintaining continuity of the sidewalk; accommodating vehicle access to and from the Project Site with as few driveways as possible; and illuminating all parking areas and pedestrian walkways.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As previously described, the Project would include an outdoor landscaped seating area that would improve the streetscape adjacent to

the Project Site. In so doing, the Project would achieve the following implementation strategies: plantings that complement pedestrian movement and views, and plantings that complement the character of the built environment.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. As depicted in the visual simulations provided in Figure IV.A-3 through Figure IV.A-7 and discussed in Section IV.A, Aesthetics, the Project would address many of the relevant implementation strategies, including: incorporating different textures, colors, materials, and distinctive architectural features that add visual interest; adding scale and interest to building façades by articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; and by including overhead architectural features, that provide shade and reduce heat gain while providing public open space at the street and on Level 13.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: pedestrian visibility, building identification, and facilitation of access; adequate lighting levels to safely light pedestrian paths; adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and the use of fixtures that are “dark sky” compliant.

Based on the Project elements previously described and the analysis herein, the Project would support the applicable Walkability Checklist objectives and implement relevant strategies. As such, the Project would be consistent with relevant aspects of the Walkability Checklist.

## (2) Consistency with Regional Plans

The Project’s general consistency with the applicable goals and principles set forth in the 2016 RTP/SCS that were adopted to avoid or mitigate an environmental effect is analyzed in Table IV.G-4 beginning on page IV.G-41. As described therein, the Project would be generally consistent with the applicable goals and principles set forth in the 2016 RTP/SCS.

## (3) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would be substantially consistent with the whole of applicable goals, policies, and objectives in local and regional land use plans that have been adopted to avoid or mitigate an environmental effect. **As such, impacts related to land use consistency would be less than significant.**

**Table IV.G-4**  
**Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy**

Goals and Principles	Would the project conflict?
<b>RTP/SCS Goals</b>	
Maximize mobility and accessibility for all people and goods in the region.	<b>No Conflict.</b> The Project is an infill development within the urbanized Hollywood community of the City and is surrounded by a mature network of roads and freeways that provide local and regional access. The Project Site is also located in proximity to several public transit opportunities, including the Metro Red Line subway and numerous bus lines operated by the Metro and LADOT. The closest Metro Red Line station is the Hollywood/Vine Station located less than 300 feet south of the Project Site. The availability and accessibility of public transit in the project area is evidenced by the Project Site's location within a designated High-Quality Transit Area (HQTA). <sup>20</sup> The 2016 RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. In addition, the Project would provide a total of 72 bicycle parking spaces for the visitors to the hotel that would promote walking and the use of bicycles. Thus, the Project's convenient location, proximity to a variety of transportation options, and design features would maximize mobility and accessibility for visitors and guests of the hotel.
Ensure travel safety and reliability for all people and goods in the region.	<b>No Conflict.</b> The Project does not include any hazardous design features that could pose safety issues to travelers.
Preserve and ensure a sustainable regional transportation system.	<b>No Conflict.</b> As discussed in Section IV.J, Transportation, of this Draft EIR, Project impacts related to the Los Angeles County Congestion Management Plan, which serves as the monitoring and analytical basis for regional transportation funding decisions, would be less than significant.
Maximize the productivity of our transportation system.	<b>No Conflict.</b> The Project would support the use and productivity of the public transportation system by concentrating new development within an HQTA, as discussed above. Refer to the goal to "Maximize mobility and accessibility for all people and goods in the region," above.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	<b>No Conflict.</b> The Project is located in an area that allows for convenient access to entertainment, retail, restaurant, and other neighborhood-serving commercial uses, as well as to a variety of public transit options. The Project's proposed outdoor plaza and streetscape improvements would promote walkability in the vicinity of the Project Site. In addition, the Project would provide a total of

<sup>20</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

**Table IV.G-4 (Continued)**  
**Applicable Goals and Principles of SCAG's Regional Transportation Plan/Sustainable Communities Strategy**

Goals and Principles	Would the project conflict?
	<p>approximately 72 bicycle parking spaces within the Project Site that would encourage guests and visitors to bicycle to and from the Project. In addition, the Project would promote walking by enhancing the streetscape surrounding the Project Site.</p> <p>As set forth in Project Section IV.J, Transportation, of this Draft EIR, the Project would implement a TDM Program that would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips, thereby facilitating a reduction in vehicle miles traveled and improved air quality. Furthermore, as discussed in Section IV.B, Air Quality, of this Draft EIR, Project impacts related to air quality would be less than significant. Therefore, the Project's location and design features would encourage active transportation within the Project Site and surrounding area, which would help to protect the environment and health of residents</p>
Actively encourage and create incentives for energy efficiency where possible.	<p><b>No Conflict.</b> As detailed in Section II, Project Description, of this Draft EIR, the Project incorporates the principles of smart growth and environmental sustainability, as evidenced by its mixed-use nature, proximity to transit and walkable streets, and the presence of existing infrastructure. The Project Site is specifically located less than 300 feet north of the Hollywood/Vine Station, which is served by the Metro Red Line, and is within walking distance to numerous bus lines, including those with service that runs every 15 minutes or less during daytime hours. The Project would incorporate LEED® features capable of achieving Silver certification under the USGBC's LEED® v4 Rating System, including features that would reduce resources and energy consumption, encourage water conservation and solid waste recycling, integrate renewable energy generation, and support alternative modes of travel.</p>
Encourage land use and growth patterns that facilitate transit and active transportation.	<p><b>No Conflict.</b> Refer to the discussion above regarding the goal to "Maximize mobility and accessibility for all people and goods in the region."</p>
<p>Source: Eystone Environmental, 2019.</p>	

## 4. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 106 related projects, as well as the Hollywood Community Plan Update, in the vicinity of the Project Site. The related projects generally consist of infill development and

redevelopment of existing uses, and include residential, commercial, office, restaurant, retail, school, studio, entertainment-related, and hotel uses, as well as combinations thereof. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies, and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as the Project would generally be consistent with applicable land use plans and policies that were adopted to mitigate or avoid an environmental effect, the Project would not incrementally contribute to cumulative inconsistencies with respect to such plans and policies. Therefore, cumulative impacts related to consistency with applicable land use plans would be less than significant and would not be cumulatively considerable.

With regard to land use compatibility, there are numerous related projects located within a few blocks of the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. The proposed developments comprise a variety of uses, including apartments, condominiums, office, restaurants, retail uses, studios, entertainment, hotel, medical, as well as mixed-use developments incorporating some or all of these elements. The Project would be compatible with the various developments planned throughout the surrounding vicinity, including the nearest related projects to the Project Site. Related Project No. 3, the Yucca Street Condominium Project, would construct an approximately 180-foot residential tower at the southwest corner of Yucca Street and Argyle Avenue, adjacent to the Capitol Records Building. Related Project No. 2, the Pantages Theater Office Project, which is located at 6225 West Hollywood Boulevard, would involve the renovation and expansion of the Pantages Theatre to create 210,000 square feet of office space. Related Project No. 1, the Millennium Hollywood Project, located at 1740 North Vine Street immediately north of the Project Site, would develop apartments, hotel uses, a health club, office uses, retail uses and restaurant uses within several buildings with maximum heights of up to 585 feet. The balance of the related projects would not cause cumulative land use impacts related to land use compatibility due to either distance and/or existing intervening development. In any event, based on the mix of uses and buildings that currently comprise the Hollywood Community Plan area as well as the related projects that are proposed or approved or are under construction, as detailed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, the Project would be compatible with the various existing developments and related projects in the immediate vicinity of the Project Site as well as with the existing and proposed uses planned throughout the surrounding vicinity. In addition, while the Project in combination with the related projects represents a continuing trend of infill development at increased densities, future development inclusive of the Project would also serve to modernize the Project vicinity, and would provide sufficient infrastructure and amenities to serve the needs of a growing population. Such related projects are not expected to fundamentally alter the existing land use relationships in the community, and as with the Project, the related projects would be required to comply with relevant land use policies. Furthermore, as

analyzed above, the Project's proposed mix of hotel and publicly-accessible restaurant uses would be compatible with surrounding land uses. For these reasons, the Project's incremental contribution with respect to land use compatibility would not be cumulatively considerable and the cumulative impact of the Project and the related projects on land use compatibility would be less than significant.

## **5. Mitigation Measures**

Project-level and cumulative impacts with regard to land use would be less than significant. Therefore, no mitigation measures would be required.

## **6. Level of Significance After Mitigation**

Project-level and cumulative impacts related to land use would be less than significant.