

## **IV. Environmental Impact Analysis**

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### **F. Land Use**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to land use. Specifically, this section analyzes the Project's consistency with relevant land use plans, policies, and regulations and evaluates the relationship of the Project with surrounding land uses.

#### **2. Environmental Setting**

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

###### **(1) Local**

At the local level, several plans and regulatory documents guide development within the City of Los Angeles (City), including the City of Los Angeles General Plan (General Plan) and the Los Angeles Municipal Code (LAMC), which govern land use through specific development and design standards and building and safety codes. The Project Site is located within the Central City Community Plan (Community Plan) and City Center Redevelopment Project areas of the City. In addition, the Project Site is located within or subject to the following: Broadway Theater and Entertainment District Community Design Overlay (CDO); Broadway Streetscape Master Plan (Streetscape Plan); Historic Broadway Sign Supplemental Use District (Broadway Sign District); Downtown Design Guide; Citywide Design Guidelines; City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist); Greater Downtown Housing Incentive Area; Adaptive Reuse Incentive Area; Transit Priority Area (TPA); and a Los Angeles County Metropolitan Transportation Authority (Metro) Rail Project Area based on construction of a Metro Regional Connector portal and station within the site. 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 as a comprehensive long-term plan for future development providing guiding principles, policies, and objectives.

The City's General Plan was originally adopted in 1974 and sets forth goals, objectives, and programs to guide land use policies and meet the existing and future needs of the community. The General Plan consists of a series of documents which includes the seven state-mandated elements: Land Use, Circulation (Mobility), Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the City of Los Angeles General Plan Framework Element (Framework Element). The Land Use Element is comprised of 35 local area plans known as Community Plans that guide land use at the local level. As previously indicated, the Project Site is located within the boundaries of the Central City Community Plan area. Each of these General Plan components are discussed below.

*(i) General Plan Framework Element*

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues in the City and defines citywide policies 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. A brief description of each of the Framework Element chapters is provided below.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element is analyzed in Table IV.F-1, beginning on page IV.F-35, and the corresponding discussion in the impact analysis below.

Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are described in terms of intensity/density ranges, development heights, and lists of typical land uses: Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. These land use categories are intended to serve as guidelines for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City.<sup>1</sup>

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<sup>1</sup> As indicated in Chapter 1 of the Framework Element, it 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 the City's Community Plans. The Framework (Footnote continued on next page)

The Project Site is designated as Regional Center Commercial in the Community Plan and is located within the designated Downtown Center.<sup>2</sup> Downtown Center is defined as:

*...an international center for finance and trade that serves the population of the five county metropolitan region. Downtown is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities, and the Convention Center. The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high rise buildings.*

### Housing Chapter

The overarching goal of the Framework Element Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter provides the following policies to achieve this goal:

- Concentrating opportunities for new development in the City's Neighborhood Districts and in Community Centers, Regional Centers, and the Downtown Center, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards located near existing or planned major transit facilities and areas characterized by low-intensity or marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and
- Focusing mixed uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

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*Element expressly states that it "is not sufficiently detailed to impact requests for entitlements on individual parcels. Community Plans will be more specific and will be the major documents to be looked to for consistency with the General Plan for land use entitlements." The Executive Summary of the Framework Element similarly states that it "does not convey or affect entitlements for any property." Therefore, while the Central City Community Plan will be the primary document the City uses to evaluate consistency with the General Plan, an analysis of the consistency of the Project with the Framework Element has also been included for informational purposes.*

<sup>2</sup> Los Angeles Department of City Planning, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Figure 3-1: Long Range Land Use Diagram—Metro*, re-adopted by City Council on August 9, 2001.

### Urban Form and Neighborhood Design Chapter

The Framework Element Urban Form and Neighborhood Design Chapter establishes a goal of creating a livable City for existing and future residents. This chapter defines “urban form” as the City’s general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. “Neighborhood design” is defined as the physical character of neighborhoods and communities. 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.

### Economic Development Chapter

The Framework Element Economic Development Chapter 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

The goals of the Transportation Chapter 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 Transportation Chapter goals, objectives, policies, and related implementation programs are set forth in the General Plan Transportation Element adopted by the City in September 1999. In August 2015, the City Council adopted Mobility Plan 2035 to replace the 1999 Transportation Element. The City Council readopted Mobility Plan 2035 in January 2016 and again in September 2016 upon consideration of additional

amendments.<sup>3</sup> Accordingly, the Framework Element Transportation Chapter is now implemented through Mobility Plan 2035. Refer to Subsection 2.a.(1)(a)(iv), on page IV.F-6 for a discussion of that plan.

### Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter addresses infrastructure and public service systems, 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. 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.

#### *(ii) General Plan Conservation Element*

The City's General Plan includes a Conservation Element, Section 5 of which recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes 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>4</sup>

The Project's consistency with applicable policies set forth in the Conservation Element is analyzed in the impact analysis below in Subsection 3.c.(3)(a)(iii) on page IV.F-53.

#### *(iii) General Plan Housing Element*

Adopted in December 2013, the Housing Element 2013–2021 identifies four primary goals and associated objectives, policies and programs. The goals are as follows:

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<sup>3</sup> Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.

<sup>4</sup> City of Los Angeles *Conservation Element of the General Plan*, adopted September 26, 2001, p. II-9.

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs;
- A City in which housing helps to create safe, livable and sustainable neighborhoods;
- A City where there are housing opportunities for all without discrimination; and
- A City committed to ending and preventing homelessness.

The Project's consistency with applicable policies set forth in the General Plan Housing Element is analyzed in Table IV.F-2 beginning on page IV.F-55 in the impact analysis below.

*(iv) Mobility Plan 2035*

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. Mobility Plan 2035 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." Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:<sup>5</sup>

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

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<sup>5</sup> City of Los Angeles Department of City Planning, *Mobility Plan 2035: An element of the General Plan, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.*

Each of these goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in Mobility Plan 2035 is analyzed in Table IV.F-1 beginning on page IV.F-35 in the impact analysis below.

*(v) General Plan Health and Wellness Element—Plan for a Healthy Los Angeles*

The Plan for a Healthy Los Angeles is the Health and Wellness Element of the General Plan. Adopted in March 2015, the Health and Wellness Element provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development.<sup>6</sup> The Health and Wellness Element sets forth two policy objectives: (1) to elevate existing health-oriented policies in the General Plan and, where policy gaps exist; and (2) to create new policies to reinforce the City's goal of creating healthy, vibrant communities. The Health and Wellness Element identifies seven primary goals and identifies policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. These goals include the following:

- Los Angeles, a Leader in Health and Equity: Recognize the complexity of the issues behind poor health outcomes and the multidisciplinary and collaborative approach needed to uproot health disparities;
- A City Built for Health: Use design, construction, and public services to promote the physical, mental, and social well-being of its residents and make it easier for people to shop, buy fresh produce, visit a doctor, have meaningful social interactions, breathe cleaner air, and live and age in their community, across income levels and physical abilities;
- Bountiful Parks and Open Spaces: Support opportunities for physical activity, offer safe havens for families and children, provide spaces for social interaction, provide access to nature, and offer mental respite;
- Food that Nourishes the Body, Soul, and Environment: Include food resources that make the healthiest choice the easiest choice in all neighborhoods, while also supporting sustainable food growing and distribution within and beyond the City's jurisdiction to encourage healthy living and create a resilient, healthy and equitable food system;

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<sup>6</sup> Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, March 2015.

- **An Environment Where Life Thrives:** Provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins;
- **Lifelong Opportunities for Learning and Prosperity:** Focus on improving educational attainment, enhancing opportunities for learning at all stages of life, and workforce development, with the goal of enhancing opportunities for economic prosperity; and
- **Safe and Just Neighborhoods:** Create safe communities through community-based public safety initiatives and increase access to gang prevention resources, which includes access to economic and educational opportunities and collaborative relationships with public safety officials.

Although most of these goals apply at a regional- or citywide-level, the Project's consistency with applicable goals in the Health and Wellness Element is presented in the impact analysis below in Subsection 3.c.(3)(a)(iv) on page IV.F-54.

*(b) Central City Community Plan*

The Central City Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the General Plan Framework Element. Last updated in 2003, 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 Community Plan area within the larger framework of the City. In addition, the Community Plan guides the development and improvement of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, and protect investments to the extent reasonable and feasible.

As shown in Figure IV.F-1 on page IV.F-9, the Community Plan designates the Project Site as Regional Center Commercial, as further discussed below. The Project's consistency with applicable land use policies in the Community Plan is analyzed in Table IV.F-3 beginning on page IV.F-58 in the impact analysis below.

*(i) Central City Community Plan Update*

The City of Los Angeles Department of City Planning (DCP) is currently updating the Central City Community Plan in conjunction with an update to the Central City North Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown





## GENERAL PLAN LAND USE

### COMMERCIAL

■ Regional Center Commercial

### OPEN SPACE / PUBLIC FACILITIES

■ Open Space

■ Public Facilities

Project Site

**Figure IV.F-1**  
Land Use Designations for the Project Site and Vicinity

Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.<sup>7</sup> Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:<sup>8</sup>

- Accommodate anticipated growth through 2040 in an inclusive, equitable, sustainable, and healthy manner while supporting and sustaining Downtown's ongoing revitalization
- Reinforce Downtown's jobs orientation
- Grow and support the residential base
- Strengthen neighborhood character
- Promote a transit, bicycle, and pedestrian friendly environment
- Create linkages between districts
- Create a World-Class Streets and Public Realm

As currently proposed by the draft DTLA 2040 Plan, the Project Site will be designated as part of the Transit Core, which will allow a maximum floor area ratio (FAR) of between 10:1 and 13:1, with general uses that include regional mixed-use, multi-family residential, entertainment, and office uses. The DTLA 2040 Plan proposes the following description of the Transit Core:<sup>9</sup>

*Transit Core areas are dense centers of activity built around regional transit hubs that provide easy access for pedestrians, transit users, and cyclists to a variety of experiences and activities. These places provide a high-energy urban experience, with towers activated by ground-floor retail that engages and invites pedestrians. Buildings have high-quality design and provide visual interest. Enhanced streetscapes, paseos, and alleys create a seamless network of walkable paths that balance the high-intensity built environment. A diverse mix of office, residential, retail, cultural, and entertainment uses make these places centers of activity around the clock.*

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<sup>7</sup> City of Los Angeles, DTLA 2040, About This Project, [www.dtl2040.org](http://www.dtl2040.org), accessed April 8, 2018.

<sup>8</sup> City of Los Angeles, DTLA 2040, Downtown Core Principles, [www.dtl2040.org/core-principles.html](http://www.dtl2040.org/core-principles.html) <http://www.dtl2040.org/about.html>, accessed April 8, 2018.

<sup>9</sup> City of Los Angeles, DTLA 2040, Downtown Community Plans EIR Scoping Meeting Presentation, February 2017.

With support from Metro, the City will promote Downtown's role as the convergence point for regional transit lines connecting multiple cities across Los Angeles County. As such, the DTLA 2040 Plan will focus on Metro's new Regional Connector and existing transit station areas to improve the walkability and transit orientation of Downtown's neighborhoods.<sup>10</sup> The Regional Connector, currently under construction throughout Downtown and anticipated to open in 2021, will be a 1.9-mile underground light-rail system extension that connects the Metro Gold Line to the 7th Street/Metro Center Station.<sup>11</sup> The Regional Connector will allow for direct connections between the cities of Azusa and Long Beach and between East Los Angeles and Santa Monica, and three new stations will be added at the following locations: (1) 1st Street/Central Avenue (Little Tokyo/Arts District Station); (2) 2nd Street/Broadway (Historic Broadway Station) within the Project Site; and (3) 2nd Street/Hope Street (Grand Avenue Arts/Bunker Hill Station).<sup>12,13</sup> As such, the Regional Connector will improve access to both local and regional destinations by providing connections to other rail lines via the 7th Street/Metro Center Station, which is located approximately ¾ mile (3,800 feet) southwest of the Project Site.

The DCP, in partnership with the Downtown community, is anticipated to reflect such growth trends in the DTLA 2040 Plan and its policies, plans, and programs for Downtown. As such, the DTLA 2040 Plan will inform developers of allowable development options, densities, and intensities and bring the 2003 Central City Community Plan up-to-date as an improved planning tool.<sup>14</sup> The DTLA 2040 Plan process began in 2014, and a public scoping meeting was held in February 2017 to collect comments from agencies and the public. A Draft EIR regarding the DTLA 2040 Plan is anticipated to be released in 2019.

### *(c) Redevelopment Plan for the City Center Redevelopment Project*

The City Council established the City Center Redevelopment Project on May 15, 2002 with its adoption of the Redevelopment Plan for the City Center Redevelopment

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<sup>10</sup> City of Los Angeles, DTLA 2040, About DTLA 2040, Welcome to the Downtown Community Plans, [www.dtl2040.org/about.html](http://www.dtl2040.org/about.html), accessed April 8, 2018.

<sup>11</sup> Los Angeles County Metropolitan Transportation Authority, Regional Connector Transit Project, [www.metro.net/projects/connector/](http://www.metro.net/projects/connector/), accessed April 8, 2018.

<sup>12</sup> Los Angeles County Metropolitan Transportation Authority, Regional Connector Transit Project, [www.metro.net/projects/connector/](http://www.metro.net/projects/connector/), accessed April 8, 2018.

<sup>13</sup> As discussed further below, separate from the proposed Project, a Metro Regional Connector portal and station are currently under construction on-site.

<sup>14</sup> City of Los Angeles, DTLA 2040, About DTLA 2040, Welcome to the Downtown Community Plans, [www.dtl2040.org/about.html](http://www.dtl2040.org/about.html), accessed April 8, 2018.

Project (Redevelopment Plan).<sup>15</sup> The 879-acre area covered by the City Center Redevelopment Plan is generally bounded by Second and Third Streets to the north; San Pedro Street, Stanford Avenue, and Griffith Avenue to the east; the I-10 Freeway to the south; and Figueroa Street and the I-110 Freeway to the west. The Redevelopment Plan area is comprised of portions of the former Central Business District (CBD) Redevelopment Project area and incorporates three major sub-areas within Downtown: the Historic Downtown Sub-Area; South Park Sub-Area; and the City Markets Sub-Area. The Project Site is located at the northern end of the Historic Downtown Sub-Area.

The Redevelopment Plan's main objectives include the redevelopment and rehabilitation of Downtown as the major center of the Los Angeles metropolitan area; the elimination and prevention of blight and deterioration; and the creation of a modern, efficient, and balanced urban environment comprised of a variety of land uses including medium- and high-density housing, employment opportunities, an integrated transportation system, open space amenities, and other appropriate public and social services and facilities. Development within the Historic Downtown Sub-Area in particular is aimed at achieving a mixed-use residential, commercial, office, cultural, recreational, entertainment, and institutional area. Within this sub-area, the Redevelopment Plan calls for both private and government offices, residential uses, theaters, restaurants, local- and regional-serving commercial and entertainment uses, and other uses compatible with a medium- to high-density mixed-use urban core environment. Private properties designated as Regional Center Commercial (such as the Project Site) are specifically targeted for these types of uses, including business and professional offices, retail stores, and medium- and high-density housing where compatible with existing and proposed development.

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 redevelopment agencies in California. The decision upheld AB X1 26, which led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles. The dissolution of the agencies became effective February 1, 2012. However, AB X1 26 did not dissolve any redevelopment plans previously adopted by redevelopment agencies. Therefore, the City Center Redevelopment Plan and its requirements for development are still in effect. The Redevelopment Plan is now administered by CRA/LA, a Designated Local Authority and

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<sup>15</sup> CRA/LA, *City Center Project Area Overview*, [www.crala.org/internet-site/Projects/City\\_Center/](http://www.crala.org/internet-site/Projects/City_Center/), accessed May 1, 2018.

successor of the former Community Redevelopment Agency of the City of Los Angeles, until such time as plan administration is transferred to the DCP.<sup>16</sup>

In June 2012, the State passed AB 1484, which allows a city to request that all land use-related plans and functions of a former redevelopment agency be transferred to the jurisdiction that originally authorized the creation of the redevelopment agency. Pursuant to that legislation, the City Council directed DCP to prepare an ordinance that would transfer redevelopment land use plans and functions to the City of Los Angeles.<sup>17</sup> Although the City Planning Commission has approved a proposed resolution transferring land use authority for redevelopment plans to the City, as well as a proposed ordinance in order for DCP to begin implementation of active redevelopment plans upon adopt of the resolution, as of May 2018, the City Council has not taken any further action.<sup>18</sup>

Also in June 2012, the Governing Board of the CRA/LA adopted Resolution No. 16, which clarified the CRA/LA's role in discretionary land use actions and set forth the land use hierarchy between the City's General Plan, Community Plans, Zoning Ordinance, and the Redevelopment Plans. Among other things, the resolution clarifies that the land use designations and associated land use regulations set forth in a redevelopment plan for any property in a redevelopment plan area shall defer to and be superseded by the applicable General Plan, Community Plan, and Zoning Ordinance land use designations and regulations. The resolution also clarifies that future CRA/LA review of development projects shall not require discretionary land use approvals, although projects within the Redevelopment Project areas shall continue to be reviewed for Plan conformance.<sup>19</sup> As of October 2018, a draft ordinance has been prepared to formally transfer to the City the "unexpired land use related plans and functions of the former CRA," but has not yet been approved.<sup>20</sup>

While the type, size, and height of buildings in the Redevelopment Plan area are generally governed by other regulations, development standards set forth in the Redevelopment Plan that are applicable to the Project Site include a maximum FAR of 6:1

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<sup>16</sup> CRA/LA, [www.crala.org/internet-site/index.cfm](http://www.crala.org/internet-site/index.cfm), accessed May 1, 2018.

<sup>17</sup> See Council File No. 12-0014-S4, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=12-0014-s4>, accessed May 29, 2018.

<sup>18</sup> Case No. CPC-2013-3169-CA, CEQA No. ENV-2013-3170-CE, Council File No. 13-1482-S1, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=13-1482-S1>, accessed May 15, 2018.

<sup>19</sup> Governing Board of the CRA/LA, A Designated Local Authority, Resolution No. 16, adopted June 21, 2012.

<sup>20</sup> City of Los Angeles, Case No. CPC-2018-6005-CA draft ordinance.

in the Historic Downtown Sub-Area and a prohibition on billboards and supergraphics (per a Design for Development regarding signage). Development within the Redevelopment Plan area requires a determination by CRA/LA regarding Project conformance with the Redevelopment Plan and associated design guidelines and development controls.<sup>21</sup>

The Project's consistency with the Redevelopment Plan is discussed in the impact analysis below in Subsection 3.c.(3)(c) on page IV.F-62.

*(d) Los Angeles Municipal 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.F-2 on page IV.F-15, the entire Project Site is zoned [Q]C2-4D-CDO-SN (Commercial, Height District 4 with D limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). Uses permitted within the C2 zone include various types of commercial retail stores; business and professional offices; and any residential use permitted in the R4 Multiple Residential Zone provided certain conditions are met. Height District 4 with a D limitation allows an FAR of 6.0:1. The site is also subject to [Q] conditions, which were established by Ordinance No. 180,871 in 2009 as part of the adoption of the Broadway Theater and Entertainment District Design Guide (Broadway Design Guide; discussed below), which guides development within the Broadway Theater and Entertainment District CDO. The [Q] conditions prohibit certain types of land uses, particularly on the ground floor along the streetwall; dictate building form and massing, including building heights and setbacks along the streetwall, lot coverage requirements for buildings over 150 feet in height, and ground floor treatments; and specify the location of parking and mechanical equipment. Signage regulations were originally included in the [Q] conditions but were later removed by Ordinance No. 184,055 in 2016 and replaced with the Broadway Sign District (discussed below). The Broadway Sign District supports and enhances historic preservation, economic development, and revitalization of the Broadway Theater and Entertainment District and allows for a variety of signage that contributes to its historic nature. In addition, in October 1935, a 5-foot Building Line was established along Broadway by Ordinance No. 75,667.

The Greater Downtown Housing Incentive Area was created by Ordinance No. 179,076. Incentives offered to produce housing in this area are set forth in LAMC Section 12.22 C 3 and include no limitation on the maximum number of dwelling units and

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<sup>21</sup> *Governing Board of the CRA/LA, A Designated Local Authority, Resolution No. 16, adopted June 21, 2012.*



limited restrictions on yard and open space requirements, subject to certain conditions. Floor area bonuses also are permitted in this area, as set forth in LAMC Section 12.22 A 29. However, as the Project Applicant is not proposing affordable dwelling units or seeking a density bonus as part of the Project, the development incentives allowed in the Greater Downtown Housing Incentive Area would not apply to the Project. Accordingly, other provisions, including those set forth in the Project Site's [Q] conditions, would govern, and no further discussion of the Greater Downtown Housing Incentive Area is provided herein.

The Project's consistency with applicable LAMC requirements is presented in the impact analysis below in Subsection 3.c.(3)(d) on page IV.F-62.

*(e) Broadway Theater and Entertainment District Design Guide*

The Project Site lies at the northern end of the Broadway Theater and Entertainment District CDO area, where development is encouraged to reflect the overall vision of a cohesive, pedestrian-friendly, and vibrant entertainment, commercial, and mixed-use district.<sup>22</sup> To that end, the Broadway Theater and Entertainment District Design Guide provides guidelines and standards for development projects along Broadway between 2nd Street on the north and Olympic Boulevard on the south, as well as on some adjacent parcels. The Broadway Design Guide provides guidance and direction on the rehabilitation of existing structures and the design of new buildings to improve the appearance, enhance the identity, and promote the pedestrian environment of the Broadway corridor and to encourage the development of a regional entertainment district centered around its 12 historic theaters.<sup>23</sup> The following key elements are recommended to achieve this vision: a consistent streetwall at the property line, with appropriate recesses for entrances; adequate transparency; appropriate signage; increased landscape detailing (as appropriate); and protection of historic structures. The Broadway Design Guide includes guidelines and standards that outline specific measures to promote and enhance the identity of the Broadway Theater and Entertainment District.

Additional discussion of the Broadway Design Guide is provided in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. An analysis of the Project's consistency with applicable guidelines and standards in the

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<sup>22</sup> *Separate from the Broadway Theater and Entertainment District CDO area in which the Project Site is located, the Broadway Theater and Commercial District (Historic District), which is listed in the National Register of Historic Places, is located south of the Project Site; the Project Site is not included in the Historic District. For further discussion of the Historic District, refer to Section IV.C, Cultural Resources, of this Draft EIR.*

<sup>23</sup> *Los Angeles Department of City Planning, Broadway Theater and Entertainment District Design Guide, July 9, 2009 (effective October 26, 2009).*



Broadway Design Guide is provided in Appendix E of this Draft EIR and summarized below.

*(f) Broadway Streetscape Master Plan*

The Broadway Streetscape Master Plan strives to create a multi-modal, pedestrian-focused street supporting a thriving, revitalized historic theater district. The Streetscape Plan provides a vision for improvements to the Broadway corridor's public realm and offers a variety of design tools and streetscape elements, as well as criteria to apply to the individual blocks of Broadway from 2nd Street to Olympic Boulevard.<sup>24</sup> The design principles outlined in the Streetscape Plan consist of "keeping it simple;" avoiding historic recreations; striving for high levels of transparency; creating and highlighting pedestrian connections; enhancing the perception of safety; laying the foundation for a timeless streetscape; creating an environmentally responsible design; and stimulating private sector investment. The Streetscape Plan outlines design and location criteria for specific physical features relating to the reconfiguration of Broadway (e.g., transit stops, curb extensions, driveways, and streetlights) as well as a materials palette and guidelines for locating materials along Broadway.

Additional discussion of the Broadway Streetscape Master Plan is provided in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. The Project's consistency with applicable Streetscape Plan principles is discussed in the impact analysis below in Subsection 3.c.(3)(f) on page IV.F-67.

*(g) Historic Broadway Sign Supplemental Use District*

The Historic Broadway Sign Supplement Use District (Broadway Sign District), adopted on January 20, 2016, encompasses the Broadway Theater and Entertainment District and parcels fronting intersecting streets from 1st Street to 12th Street. The Broadway Sign District was established to support and enhance historic preservation, economic development, and revitalization of the Broadway Theater and Entertainment District and directly adjacent blocks, and to reduce blight along the corridor.<sup>25</sup> In addition, the Broadway Sign District allows appropriate and economically viable signage that contributes to the historic nature of the Broadway District; limits visual clutter and blight by regulating signs; minimizes potential traffic hazards and protect public safety; utilizes off-site advertising rights to incentivize investment in the rehabilitation and reactivation of

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<sup>24</sup> Los Angeles Department of City Planning, *Broadway Streetscape Master Plan*, February 14, 2013.

<sup>25</sup> Los Angeles Department of City Planning, *Historic Broadway Sign Supplemental Use District*, January 20, 2016.

existing buildings and construction of new buildings on vacant and underutilized sites; and reinforces the authenticity of Broadway as one of California's oldest and most unique historic districts. The Broadway Sign District regulations include general standards, illumination standards, and specific design, size, and location standards for various types of signs.

Additional discussion of the Broadway Sign District is provided in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. The Project's consistency with applicable signage requirements is discussed in the impact analysis below in Subsection 3.c.(3)(g) on page IV.F-68.

*(h) Downtown Design Guide: Urban Design Standards and Guidelines*

The Downtown Design Guide: Urban Design Standards and Guidelines (Downtown Design Guide), revised and adopted in June 2017, supplements the General Plan Framework Element, Central City Community Plan, and LAMC in promoting high quality design and architecture while preserving the character and scale of Downtown Los Angeles. To encourage the development of a more sustainable community, the Downtown Design Guide calls for sound choices at all levels of planning and design—from land use and development decisions to building massing and materials choices—with an emphasis on walkability and the creation of great streets, districts, and neighborhoods. The focus of the Downtown Design Guide is on the relationship of buildings to the street, including sidewalk treatment, building character adjacent to sidewalks, and transit connections. The successful treatment of these key features, coupled with attention to building façade details in the first 30 to 40 vertical feet, forms the basis for providing high quality development at a human scale.<sup>26</sup>

Additional discussion of the Downtown Design Guide is provided in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. Analysis of the Project's consistency with applicable design principles, standards, and guidelines in the Downtown Design Guide is provided in Appendix E of this Draft EIR.

*(i) Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by DCP staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant

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<sup>26</sup> City of Los Angeles, *Downtown Design Guide*, June 2017.

policies from the Framework Element and Community Plans.<sup>27</sup> 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 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>28</sup> The City’s Urban Design Studio, which is part of the DCP, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals. 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.

Additional discussion of the Citywide Design Guidelines is provided in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. Analysis of the Project’s consistency with applicable design principles, standards, and guidelines in the Citywide Design Guidelines is provided in Appendix E of this Draft EIR.

*(j) City of Los Angeles Walkability Checklist*

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review 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. DCP staff use the Walkability Checklist in evaluating a project’s 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 all community members to enhance pedestrian movement, access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in

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<sup>27</sup> *The Citywide Design Guidelines apply to all areas of the City, but are particularly applicable to those areas where geographically-specific design guidelines have not been adopted. In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter or a specific plan, the community-specific requirements shall prevail.*

<sup>28</sup> *Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5.*

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>29</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 (private areas of projects) 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.

As with the design principles included in the Framework Element's Urban Form and Neighborhood Design Chapter, the guidelines provided in the Walkability Checklist are not 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.

As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, Walk Score calculates a transit score based on the number and proximity of bus and rail routes, which generates a transit score of approximately 100 out of 100 (considered "Rider's Paradise") for the Project Site.<sup>30</sup> Similarly, Walk Score calculates bike scores based on topography, the number and proximity of bike lanes, and other cycling-related factors and gives the Project Site a bike score of approximately 79 out of 100 ("Very Bikeable"). Both of these factors contribute to the overall walkability and pedestrian environment of the Project Site and surrounding area.

Additional discussion of the Walkability Checklist is provided in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. The Project's consistency with the Walkability Checklist is presented in the impact analysis below in Subsection 3.c.(3)(h) on page IV.F-69.

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<sup>29</sup> City of Los Angeles Department of City Planning, *Walkability Checklist Guidance for Entitlement Review*, November 2008.

<sup>30</sup> Walk Score ([www.walkscore.com](http://www.walkscore.com)) calculates the transit score of an address by locating nearby bus/rail transit routes and stops. Walk Score measures how easy it is to live a car-lite lifestyle.

*(k) Adaptive Reuse Incentive Area*

The Project Site is located within a designated Adaptive Reuse Incentive Area and thus subject to the City's Adaptive Reuse Incentive Areas Specific Plan (Adaptive Reuse Plan), established by Ordinance No. 175,038. The purpose of the Adaptive Reuse Plan is to facilitate the rehabilitation and reuse of existing underutilized, neglected, or historically significant structures for residential, live/work, or hotel-related uses. The northern portion of the Project Site, within which proposed development would occur, does not include any permanent structures. Therefore, as the Project would not involve the reuse or conversion of any existing buildings, the provisions of the Adaptive Reuse Plan do not apply to the Project.

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

The City of Los Angeles has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), Los Angeles Fire Department Strategic Plan, Los Angeles Public Library Strategic Plan 2015–2020, Public Recreation Plan, 2010 Bicycle Plan (a part of the General Plan's Mobility Plan 2035), Los Angeles Department of Water and Power 2015 Urban Water Management Plan (UWMP), Sustainable City pLAN, Green LA (the City's climate action plan), and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. 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 of this Draft EIR.

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

In September 2013, California 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 (TPA) shall not be considered significant impacts on the environment." PRC Section 21099(a) defines the following:

- *"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 one-half 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.”*

In addition, PRC Section 21064.3 defines the following:

- *A “major transit stop” is “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.”*

The Project is a mixed-use project that includes 107 residential units, approximately 7,200 square feet of ground floor commercial retail uses, and 534,044 square feet of office uses. The Project Site is located on an infill site that is less than 0.5 mile from several major transit stops. Specifically, the Project Site is located approximately 700 feet from the Civic Center/Grand Park Metro Purple and Red Line station (located at the southwest corner of 1st Street and Hill Street) and 0.48 mile from the Pershing Square Metro Purple and Red Line station. In addition, the Metro Regional Connector 2nd Street/Broadway station and portal are currently under construction on-site. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site. The site is also served by Metro Bus Lines 2, 4, 30, 33, 35, 40, 45, 68, 83, 84, 92, 302, 330, 728, 733, 745, and Los Angeles Department of Transportation (LADOT) DASH Line D, the majority of which provide frequency of service intervals of 15 minutes or less during peak hours. The site is also served by other lines operated by Antelope Valley, Big Blue Bus, Commerce Bus, Gardena Bus, Montebello Bus, Santa Clarita, Foothill Transit, Orange County Transportation Authority (OCTA), and Torrance Transit Service. Therefore, the Project is located in a transit priority area, as shown in Figure IV.A-1 in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR. In addition, the City’s Zone Information and Map Access System (ZIMAS) confirms the Project Site’s location within a transit priority area, as defined in City Zoning Information (ZI) File No. 2452.<sup>31</sup>

Accordingly, the Project qualifies as a mixed-use residential and/or employment center project on an infill site within a transit priority area. As such, per SB 743 and ZI No.

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<sup>31</sup> *City of Los Angeles ZI No. 2452 provides instruction concerning the definition of transit priority projects and states “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [L.A. CEQA Thresholds Guide] shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”*

2452, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Nonetheless, for informational purposes only, Project impacts related to aesthetics and parking are discussed in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), and Section IV.J, Transportation/Traffic, respectively, of this Draft EIR.

## (2) Regional

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS); and the Los Angeles County Congestion Management Program (CMP), which regulates regional traffic and is administered by the Metro. 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 2016–2040 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 2016–2040 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians." The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, 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 2016–2040 RTP/SCS establishes commitments to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing and environmental planning in order to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS). The 2016–2040 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.

Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within an HQTA as designated in the 2016–2040 RTP/SCS.<sup>32,33</sup>

The Project's consistency with the applicable goals of the 2016–2040 RTP/SCS is analyzed in Table IV.F-5 beginning on page IV.F-73 in the impact analysis below.

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

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. 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, 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.

*(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, 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/Traffic, of this Draft EIR for further discussion of the Project's consistency with the CMP.

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<sup>32</sup> SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016.

<sup>33</sup> Los Angeles County Metropolitan Transportation Authority, High Quality Transit Areas—Southeast Quadrant map.



## **b. Existing Conditions**

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

As discussed in Section II, Project Description, of this Draft EIR, existing uses at the Project Site consist of a former surface parking lot (which is currently in use as a staging and excavation area for construction of the Metro Regional Connector 2nd Street/Broadway rail station and portal) and a five-level parking structure that includes rooftop parking and two subterranean levels. Pursuant to a right-of-entry agreement, Metro has had exclusive control and use of the northern portion of the Project Site since March 2015 and will continue to use it as a construction staging/laydown location for the Regional Connector project until September 2021. At that time, control of the former surface parking lot (with the exception of the portal area), will revert back to the Applicant. Metro's current plans call for the restoration of a paved surface area on those areas of the northern portion of the Project Site outside of the new Metro portal and plaza area following the completion of Metro's construction activities. The surface parking lot previously included 99 vehicular parking spaces. The parking structure in the southern portion of the Project Site currently provides 1,460 vehicular spaces, which are used for parking by tenants of Los Angeles Times Square, as well as public parking for other businesses, commuters, and residents in the immediate area. Access to the parking structure is provided via one driveway on Broadway and two driveways on Spring Street. Current landscaping on the Project Site is limited to street trees and a narrow landscaped parkway that traverses the center of the site along the northerly edge of the existing parking structure.

As previously discussed and as shown in Figure IV.F-1 on page IV.F-9, the Project Site is designated as Regional Center Commercial by the Central City Community Plan. As shown in Figure IV.F-2 on page IV.F-15, the entire Project Site is zoned [Q]C2-4D-CDO-SN (Qualified Commercial 2, Height District 4 with Development "D" limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District).

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

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is surrounded by a mix of commercial office, government and civic office, retail, and residential uses contained in a range of low-rise to high-rise buildings, which are physically separated from the Project Site by local roadways. Immediately to the west is an existing surface parking lot and 10-story office building fronting Broadway. To the immediate north across 2nd Street is Los Angeles Times Square, which includes an 11-story office building and a six-level parking structure fronting 2nd Street. East of the Project Site across Spring Street are single-story commercial buildings and a six-level parking structure. To the south is a surface parking lot and six

story apartment building (Hosfield Building, now known as the Victor Clothing Building) fronting Broadway, as well as a surface parking lot and five-story apartment building (Douglas Building Lofts) fronting Spring Street.

As previously indicated, the Project Site lies at the northern end of the Broadway Theater and Entertainment District CDO area. The immediate area is defined by several iconic buildings, both old and new, including the Bradbury Building to the south, the Los Angeles Times Square buildings and City Hall to the north, the new 11-story U.S. federal courthouse on Broadway between 1st and 2nd Streets, the 10-story Los Angeles Police Department (LAPD) Headquarters, and the 15-story Caltrans buildings to the north and east, respectively. Residential uses in the Project vicinity include the 50-unit Douglas Building Lofts at 257 South Spring Street, the 135-unit Higgins Building Lofts at 108 West 2nd Street, and the seven story, 40-unit Pan American Lofts at 253 South Broadway.

### 3. Project Impacts

#### a. Methodology

The analysis of potential land use impacts considers the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, as well as the compatibility of the proposed uses with surrounding land uses.

##### (1) Land Use Consistency

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site. 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 land use 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>34</sup> More specifically, according to the ruling in *Sequoyah 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>34</sup> *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

## (2) Land Use Compatibility

The intent of the compatibility 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 also 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 compatibility 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 was issued, to the conditions that would occur with Project implementation.

### b. Thresholds of Significance

#### (1) State CEQA Guidelines Appendix G

In accordance with 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): Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or***

***Threshold (c): Conflict with any applicable habitat conservation plan or natural community conservation plan.***

#### (2) 2006 L.A. CEQA Thresholds Guide

##### *(a) Land Use Consistency*

The *L.A. CEQA Thresholds Guide* states that the determination of potential significance regarding land use consistency shall be made on a case-by-case basis, considering the following factors:

- 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 *L.A. CEQA Thresholds Guide* states that the determination of significance associated with land use compatibility shall be made on a case-by-case basis, considering the following factors:

- 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, the City will use 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 threshold questions.

## **c. Analysis of Project Impacts**

### **(1) Project Design Features**

No specific Project design features are proposed with regard to land use beyond the Project characteristics discussed in Section II, Project Description, of this Draft EIR, and summarized below.

### **(2) Relevant Project Characteristics**

*(a) Proposed Land Uses*

As discussed in Section II, Project Description, of this Draft EIR, the Project involves the development of 30-story mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses. Overall, the Project's improvements (plus the Metro portal) would comprise a total of 688,401 square feet of floor area, resulting in a FAR of 5.83:1, which would replace the former surface parking lot located on the northern portion of the Project Site. The existing five-story parking structure located on the southern portion of the Project Site would remain and provide automobile

and long-term bicycle parking for the Project, as well as parking for other off-site uses as it does under existing conditions.

In general, the proposed uses would be located in distinct areas of the new building. The ground floor would include commercial spaces fronting 2nd and Spring Streets, as well as the interior of the site (i.e., facing the Metro portal and a pedestrian paseo), with a residential lobby and loading area located along Spring Street.<sup>35</sup> Office space would be provided on levels 2 through 22, while the residential uses would be on levels 23 through 30. The proposed residences would include 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units ranging from approximately 650 square feet to 1,630 square feet in size. In addition, a single basement level would house mechanical rooms and storage. As shown in the renderings provided in Figures II-4 through II-6 in Section II, Project Description, the proposed building has been designed as a series of stacked volumes of varying sizes (floorplates), with shifting footprints and alternating types of curtain walls. Overall, the height and massing of the building would shift away from Broadway toward Spring Street.

As previously indicated, the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction, would be located at the northwest corner of the Project Site. The at-grade portal would include ticket booths, kiosks, information signs, stairs, escalators, and elevators to serve the subterranean Metro station. The mixed-use building would be built above the Metro portal, with the base of level 2 essentially serving as a roof over the station entrance. A plaza surrounding the portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated and consistent with the paseo (described below), thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street. Upon completion, the Metro Regional Connector will consist of a 1.9-mile underground light-rail system connecting the Metro Gold Line to the 7th Street/Metro Center station. The Regional Connector includes the 2nd Street/Broadway rail station, as well as two additional new stations in the Downtown area.

#### *(b) Open Space and Recreational Amenities*

For tenants, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and

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<sup>35</sup> Operating hours for the loading dock would be 24 hours per day, seven days per week.

some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents.

A landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street. The Project's landscaping would include drought-tolerant plants including both native and adaptive native plant materials.<sup>36</sup> An efficient irrigation system would be installed in all landscaped areas.

*(c) Signage and Lighting*

Project lighting would include low-level exterior lights at the perimeter of the building, in the canopy over the Metro portal, and in the paseo, as needed, for aesthetic, security, and wayfinding purposes. All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring buildings and the surrounding area. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Primary façade materials would include glass and various types of metal panels such as anodized aluminum, stainless steel, or bronze-colored metal. Glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

Project signage would be integrated with and compliment the overall aesthetic character of the Project and comply with the standards and goals of the Historic Broadway Sign Supplemental Use District. Project signage could include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, building identification signs, and other sign types. Wayfinding signs would be located at access points to the on-site parking garage, paseo, commercial and residential entries,

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<sup>36</sup> *Adaptive plants are not native and not invasive, but are able to thrive in the local climate and soil conditions.*

corridors, and elevator lobbies. Metro signage would be integrated with the overall signage concept. No off premises billboard advertising is proposed as part of the Project.

*(d) Access, Circulation, and Parking*

The existing five-level parking structure located on the southern portion of the Project Site would remain and provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). The Project would require 628 tenant vehicular parking spaces per LAMC, based on bicycle parking and transit credit deductions, as well as 0.25 space per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2. Accordingly, surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.

Access to the parking structure would continue to occur via one existing driveway on Broadway and two existing driveways on Spring Street. In addition, one new driveway on Spring Street is proposed to access the loading area for the new building.

The Project does not include street dedications. However, the following sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards for required sidewalk easement widths:

- Broadway—A 12-foot sidewalk would be provided in the public right-of-way along with an additional 5-foot wide sidewalk easement on private property.
- 2nd Street—A 15-foot sidewalk would be provided. Currently, 8 feet of the sidewalk are planned to be in the public right-of-way, and 7 feet are planned to be in a sidewalk easement on private property. This may be subject to change pending Metro's final sidewalk widening plans in conjunction with the Regional Connector project on-site.
- Spring Street—A 14-foot sidewalk would be provided in the right-of-way. This would include a merger of a 5-foot over-dedication area back into the tract as part of the subdivision process. Based on the Project's plans, there may be an additional 5 feet of paving between the building and the back of the sidewalk on private property. In addition, pursuant to Metro's current sidewalk widening plans, Metro may provide a 5-foot sidewalk easement in this paved area, which could result in a 19-foot sidewalk area along Spring Street adjacent to the Project's

new building. In addition, there would be a further sidewalk easement provided on private property for the portion of Spring Street where the Project's curbside drop-off area is planned.

*(e) Sustainability Features*

The Project incorporates the principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the Project Site's location within the established Downtown Los Angeles employment hub, proximity to transit and walkable streets, and the presence of existing infrastructure needed to service the proposed uses. Additionally, a number of specific sustainable design components would be incorporated into the Project, including the following:

- Water-efficient plantings with drought-tolerant species;
- Shade trees in public areas;
- Green walls in some outdoor areas;
- Energy-efficient lighting;
- Fenestration designed for solar orientation;
- Use of recyclable materials for flooring and demisable partitions in limited amounts;
- Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking;
- Electric vehicle charging infrastructure; and
- Permeable pavement in the paseo.

The Project also would 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 stormwater reuse. As discussed in the Initial Study for the Project, included in Appendix A of this Draft EIR, Best Management Practices (BMPs) would be implemented to collect, detain, and treat runoff on-site before discharging into the municipal storm drain system. Specifically, a stormwater capture and use system (i.e., harvesting system) is proposed on-site and would include a harvesting cistern with a pre-treatment settlement device to filter out trash and debris before water is used to irrigate the landscaped areas of the Project Site. The harvesting cistern capacity would exceed that required for an 85th percentile rainfall event (per LID requirements), thus providing 100 percent treatment



*(f) Site Security Features*

The Project would include numerous security features, including private on-site security, a closed circuit security camera system, 24-hour controlled access for the office and residential floors, and security patrols of the parking structure. The Project would be designed such that entrances and exits accessing the building, open spaces, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

*(g) Discretionary Actions*

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but are not limited to, the following:

- Vesting Zone Change to amend Ordinance No. 180,871 to remove [Q] Condition No. 7 (regarding 30 percent minimum and 40 percent maximum lot coverage for the portion of buildings over 150 feet in height) to reflect the Project's proposed design (per LAMC Sections 12.32 G and 12.32 Q);
- Site Plan Review for a project with an increase of 50,000 square feet of non-residential floor area and 50 or more dwelling units (per LAMC Section 16.05);
- Design Overlay Plan Approval for a project in the Broadway CDO Zone (per LAMC Section 13.08 E);
- Vesting Tentative Tract Map No. 74320 for a 10-lot airspace subdivision for merger, resubdivision, and condominium purposes, with a request for haul route approval (per LAMC Section 17.01 and 17.15); and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, grading permits, excavation permits, revocable permits, foundation permits, and building permits.

**(3) Project Impacts**

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

As discussed in Section VI, Other CEQA Considerations, and the Initial Study (Appendix A of this Draft EIR), the Project's proposed residential, commercial, and office

uses would be consistent with other land uses in the surrounding area and compatible with the surrounding community. Implementation of the Project would result in further infill of an already developed community with similar and compatible land uses, and all proposed development would occur within the boundaries of the Project Site as it currently exists.

In addition, the Project would not substantially or adversely change the existing land use relationships within the Project area or have the long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of any uses. **Impacts related to land use compatibility would be less than significant. Thus, the Project would not physically divide, disrupt, or isolate an established community, and Project impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

***Threshold (b): Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?***

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of the General Plan Framework Element, Conservation Element, Housing Element, Mobility Plan 2035, and Health and Wellness Element; the Central City Community Plan; LAMC; the Broadway Theater and Entertainment District Design Guide, Broadway Streetscape Master Plan and Historic Broadway Sign Supplemental Use District; and the Walkability Checklist. In addition, Project consistency with the Broadway Theater and Entertainment District Design Guide, Downtown Design Guide, and the Citywide Design Guidelines is addressed in Appendix E of this Draft EIR.

*(a) City of Los Angeles General Plan*

*(i) General Plan Framework Element*

Land Use Chapter

The Project's consistency with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Land Use Chapter is analyzed in Table IV.F-1 beginning on page IV.F-35. As detailed therein, the Project would support and be consistent with the General Plan Framework Element Land Use Chapter as it would contribute to the needs of the City's existing and future residents, businesses, and visitors by providing 107 multi-family residential units, 7,200 square feet of commercial retail uses, and

**Table IV.F-1**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
<b>Land Use Chapter</b>	
<b>Objective 3.1:</b> Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	<b>Consistent.</b> The Project would achieve this City objective by developing a new mixed-use development with a diversity of uses. Specifically, the Project would develop a total of 688,401 square feet of floor area, consisting of 107 residential units 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses that would support the needs of existing and future residents, businesses, and visitors of the Downtown community.
<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.	<b>Consistent.</b> While this policy refers to the citywide provision of public infrastructure, as discussed in Sections IV.I.1 through IV.I.5, Public Services; Sections IV.L.1 and IV.L.3, Utilities and Service Systems; and Section IV.M, Energy Conservation and Infrastructure; of this Draft EIR, as well as the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project Site would have sufficient capacity to serve the Project.
<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 parkland sand trails, neighborhood parks, and urban open spaces.	<b>Consistent.</b> While this policy relates to citywide provision of open space, the Project would provide a variety of open space areas within the Project Site, including recreational amenities for the residential and office uses, as well as a landscaped paseo connecting Broadway and the Metro portal to Spring Street. For tenants, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents. The landscaped paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving.
<b>Policy 3.1.4:</b> Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.	<b>Consistent.</b> The Long-Range Land Use Diagram shows that the Project Site is within the Downtown Center, which is described as an international center for finance and trade that serves the population of the five-county metropolitan region. In addition, the Long-Range Land Use Diagram identifies Downtown Los Angeles as the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	<p>transportation facilities, and the Los Angeles Convention Center. Furthermore, it describes the Downtown Center as generally characterized by a floor area ratio up to 13:1 and high-rise buildings.</p> <p>As discussed in Section II, Project Description, of this Draft EIR, the Project would consist of 30-story mixed-use building, consisting of 107 residential units, 7,200 square feet of commercial retail uses, and 534,044 square feet of office uses. In total, the Project would include approximately 688,401 square feet of developed floor area, corresponding to a total FAR of 5.83:1. Therefore, the Project is within the permitted FAR of 6:1 per site zoning and well below the higher FARs considered acceptable in the Downtown Center. Furthermore, the Project Site would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction. As such, the Project would be consistent with the type of development that is envisioned for the Downtown Center in the General Plan Framework.</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>Consistent.</b> The Project would be located in an area well-served by public transit, including the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction on-site, as well as existing Metro Purple and Red Line stations at Civic Center/Grand Park and Pershing Square. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site. In addition, the Project Site is served by 11 local and inter-city transit operators, including Metro LADOT DASH, Antelope Valley, Big Blue Bus, Commerce Bus, Gardena Bus, Montebello Bus, Santa Clarita, Foothill Transit, OCTA, and Torrance Transit Service. Furthermore, the Project would provide 218 long-term and 68 short-term bicycle parking spaces for residents and visitors. In addition, the ground floor commercial/retail uses, pedestrian-oriented paseo, and streetscape improvements proposed as part of the Project would promote walkability in the vicinity of the Project Site. Therefore, 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 promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution.</p>
<p><b>Policy 3.2.3:</b> Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate</p>	<p><b>Consistent.</b> See Land Use Chapter Objective 3.2.</p>

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
locations.	
<p><b>Policy 3.2.4:</b> Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.</p>	<p><b>Consistent.</b> The Project Site is currently designated for commercial uses and is surrounded by a mix of multi-family residential, commercial, office, and government uses within structures that range from low-rise to high-rise buildings.</p> <p>The Project would replace the former surface parking lot located on the northern portion of the Project Site with a single 30-story building that would provide new residential units, commercial retail uses, and office uses that would be similar to and compatible with the mix of land uses surrounding the Project Site. In addition, the Project would focus development along Spring Street and Broadway, commercial corridors that are characterized by a high degree of pedestrian activity. The Project's contemporary architectural design would be integrated with surrounding development.</p> <p>Although the proposed building would be taller than existing buildings on the immediately adjacent parcels, the scale and height of the Project would be consistent with overall development within the surrounding area and Downtown Los Angeles as a whole, as illustrated in the conceptual renderings depicting aerial views of the Project, included in Figure IV.A-7 in Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), as well as in Figure II-6 in Section II, Project Description, of this Draft EIR. The highest concentration of high-rise buildings in Downtown is located approximately three blocks southwest of the Project Site, and many other high-rise structures are located throughout the Downtown area. Thus, the Project would provide infill development within a dense urban setting that would be consistent in scale and height with surrounding development.</p>
<p><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.</p>	<p><b>Consistent.</b> As detailed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, the Project's population and employment growth would be well within SCAG's projections for the 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. As discussed in Objective 3.2 above, the Project would be located in an area well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines. The Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction on-site. In addition, as discussed in Sections IV.I.1 through IV.I.5, Public Services, Sections IV.L.1 and IV.L.3, Utilities and Service</p>

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	Systems, and Section IV.M, Energy Conservation and Infrastructure, of this Draft EIR, as well as the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project Site would have sufficient capacity to serve the Project.
<b>Objective 3.4:</b> Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers, as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	<b>Consistent.</b> The Project would develop a new mixed-use development along primary transit corridors/boulevards (Broadway and Spring Street) within the Downtown Center. The Project would replace a former surface parking lot and, as such, would not displace any land uses that contributed to the neighborhood. Also see Land Use Chapter Objectives 3.1 and 3.2 and Policies 3.1.4 and 3.2.4 above.
<b>Policy 3.4.1:</b> Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	<b>Consistent.</b> See Land Use Chapter Policy 3.1.4 for a discussion of the Project's location within the Downtown Center, Objective 3.2 for a discussion of the Project's location in an area well-served by public transit, and Policy 3.2.4 for a discussion of the Project's location within an area occupied by buildings of the same scale and character as those proposed by the Project.
<b>Objective 3.7:</b> Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	<b>Consistent.</b> While this is a citywide objective, the Project would result in growth in an area where there is sufficient public infrastructure. In addition, the Project would introduce new residential units and public amenities, including streetscape improvements and employment opportunities. See Land Use Chapter Policy 3.1.2 and Objective 3.3 for a discussion of public infrastructure and Policy 3.2.4 for a discussion of enhancement of the existing commercial district.
<b>Policy 3.7.1:</b> Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.	<b>Consistent.</b> The Project Site is located in the Downtown Center, which is defined in the Framework Long-Range Land Use Diagram and Table 3-1 as an "international center for finance and trade that serves the population of the five county metropolitan region. Downtown is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, <i>professional offices</i> , corporate headquarters, financial institutions, <i>high-rise residential towers</i> , regional transportation facilities and the Convention Center [emphasis added]. The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high-rise buildings." The proposed uses would be consistent with this definition.

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
<b>Policy 3.7.4:</b> Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	<b>Consistent.</b> As discussed below, the Project would be consistent with the relevant goals, objectives, and policies of the General Plan Framework's Urban Form and Neighborhood Design Chapter. See Urban Form and Neighborhood Design Chapter Goal 5A, Objective 5.8, and Objective 5.9 further below in this table.
<b>Objective 3.8:</b> Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.	<b>Consistent.</b> The Project would develop new residential, commercial retail, and office uses along the Broadway and Spring Street commercial corridors, which are characterized by a high degree of pedestrian activity. The proposed uses would meet the needs of the local residents and be compatible with the variety of residential, commercial, and office uses surrounding the Project Site.
<b>Policy 3.8.4:</b> Enhance pedestrian activity by the design and siting of structures.	<b>Consistent.</b> The Project would enhance pedestrian activity through building design and proposed streetscape amenities by providing ground level neighborhood-serving commercial retail uses and a landscaped paseo which would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street.
<b>Policy 3.10.4:</b> Provide for the development of public streetscape improvements, where appropriate.	<b>Consistent.</b> One of the Project's specific objectives is to enhance the pedestrian activity and street life in the area by providing ground floor retail and landscaped public open spaces that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site. The Project would provide street trees and streetscape plantings along Broadway and Spring Street. 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 in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties. Also see Land Use Chapter Policy 3.8.4 above.
<b>Policy 3.10.6:</b> Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	<b>Consistent.</b> All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring buildings and the surrounding area. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	compliance with applicable City regulations and with approval by the Bureau of Street Lighting.
<b>Objective 3.11:</b> Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.	<b>Consistent.</b> The Project would continue the redevelopment of Downtown Los Angeles by replacing a former surface parking lot with new residential, commercial, and office uses. The building's design and scope would be consistent with relevant design guidelines and new development envisioned for the Downtown Center.
<b>Objective 3.18:</b> Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.	<b>Consistent.</b> The Project would introduce a diversity of uses in an area designated as Regional Center Commercial by the Community Plan and Downtown Center by the Framework Element. As discussed above in Policy 3.1.2, agencies providing public services and utilities to the Project Site would have sufficient capacity to serve the Project. Similarly, as explained in Objective 3.2, the Project would be located in an area well-served by public transit, including the new Metro station and portal to be located on-site.
<b>Housing Chapter</b>	
<b>Objective 4.1:</b> Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion.	<b>Consistent.</b> Although this housing objective applies on a subregional level, the Project would nevertheless support it through the development of 107 new multi-family residential units, consisting of studio, one-, two-, and three-bedroom units.
<b>Objective 4.2:</b> Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	<b>Consistent.</b> As discussed in Objective 3.2 above, the Project would be located in an area well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines. The Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction on-site. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site. The Project would be located in the Downtown Center, which is characterized as a high pedestrian area. Thus, the Project would encourage and promote walkability in the high-activity Project Site vicinity. As previously discussed, the Project would be compatible in density and scale with surrounding uses. See Land Use Chapter Policy 3.2.4 for further discussion.
<b>Urban Form and Neighborhood Design Chapter</b>	
<b>Goal 5A:</b> A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of	<b>Consistent.</b> While this is a citywide goal, the Project would support it. The Project is located in Downtown Los Angeles, a high-density area featuring a mix of land uses, including commercial offices, residential, retail,



**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
those neighborhoods and functions at both the neighborhood and Citywide scales.	restaurants, entertainment, and other neighborhood services. The Project is an infill development that would revitalize a former surface parking lot by providing a high-density mixed-use development with residential, office, and ground floor commercial retail uses in proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses. The Project would be attractive to future investment and contribute to a transit-oriented mixed-use neighborhood at both the local and citywide scale when considered with other mixed-use and commercial developments within a 0.5-mile radius of the Project Site, including the related projects identified in Table III-1 and Figure III-1 in Section III, Environmental Setting, of this Draft EIR.
<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>Consistent.</b> The Project would be developed in the Downtown Center within an area well-served by public transit. As discussed in Objective 3.2 above, the Project Site would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site. In addition to four Metro rail lines, the Project Site is served by 11 local and inter-city transit operators, including Metro LADOT DASH, Antelope Valley, Big Blue Bus, Commerce Bus, Gardena Bus, Montebello Bus, Santa Clarita, Foothill Transit, OCTA, and Torrance Transit Service.
<b>Objective 5.5:</b> Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	<b>Consistent.</b> The Project is an infill development that would revitalize the Project Site by providing a mixed use development on an underutilized site. The Project would incorporate a contemporary architectural design that would complement existing development in the area. The provision of housing and street-fronting commercial uses would further provide for a vibrant urban area and enhance the livability of the neighborhood. The pedestrian paseo that would connect Broadway and Spring Street and provide pedestrian linkages to the Metro portal in the northwest portion of the Project Site would serve to enhance the neighborhood. The Project would also maximize development density adjacent to a regional transit connector, which would further enhance livability. In addition, the building façade articulation and proposed landscaping would contribute to a visually appealing streetscape and would improve the quality of the public realm by promoting pedestrian activity and further activating the streets. Overall, the uses and improvements proposed by the Project would enhance the urban lifestyle in the Project vicinity.

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
<p><b>Policy 5.7.1:</b> Establish standards for transitions in building height and for on-site landscape buffers.</p>	<p><b>Consistent.</b> The height of the Project would be consistent with buildings heights in the Downtown area, which consist of mid- and high-rise structures. The building would be comprised of a series of stacked volumes, with the height and massing of the building shifting away from Broadway toward Spring Street, which would provide a transition in building height as experienced from Broadway and 2nd Street. In addition, the Project would incorporate various surface materials that would provide horizontal and vertical articulation that break up the building planes and reduce the visual mass of the building. Landscaping, including street trees and plantings as well as landscaping within the pedestrian paseo, would provide a visual transition.</p>
<p><b>Objective 5.8:</b> Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.</p>	<p><b>Consistent.</b> As a development within the Downtown Center and a Project Site that is designated as a Regional Center Commercial, the Project would improve the streetscape and promote pedestrian activity by providing ground floor commercial retail uses featuring extensive windows to encourage pedestrian activities and create a human-scale frontage design. In addition, the Project would promote walkability by encouraging the use of public transit since the Project Site would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction.</p>
<p><b>Policy 5.8.4:</b> Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.</p>	<p><b>Consistent.</b> Project signage would be aesthetically compatible with the proposed building's architecture. Project signage would include general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, information signs associated with the parking structure, and building and tenant identification signs. Metro signage would be integrated with the overall signage concept. No off-premises billboard advertising is proposed as part of the Project. All proposed signage would be designed in conformance to applicable LAMC requirements, the Historic Broadway Sign Supplemental Use District goals and standards, and the Downtown Design Guide, as applicable.</p>
<p><b>Objective 5.9:</b> Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.</p>	<p><b>Consistent.</b> The Project would incorporate elements that promote individual and community safety. Specifically, as provided in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security; a closed circuit security camera system; 24-hour controlled access for the office and residential floors; security patrols of the parking structure; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building; and sufficient lighting of parking areas to maximize visibility</p>

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	and reduce areas of concealment.
<b>Open Space and Conservation Chapter</b>	
<b>Policy 6.3.3:</b> Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.	<b>Consistent.</b> The Project's public open space areas, including the paseo, would be designed for maximum visibility and safety and would incorporate crime prevention elements, such as natural surveillance, natural access control, and territorial reinforcement to separate public and private spaces. Also see Urban Form and Neighborhood Design Chapter Objective 5.9 for a discussion of security features implemented as part of the Project.
<b>Policy 6.4.4:</b> Consider open space as an integral ingredient of neighborhood character, especially in targeted growth areas, in order that open space resources contribute positively to the City's neighborhoods and urban centers as highly desirable places to live (see Chapter 5: Urban Form and Neighborhood Design).	<b>Consistent.</b> The Project would include a total of 27,765 square feet of usable common open space and 800 square feet of usable private open space. This open space would include ground level landscaped areas, including the pedestrian paseo; landscaped terraces; rooftop gardens; gathering spaces including barbeque and outdoor dining areas; and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. The open space and recreational amenities for the Project would exceed the open space requirement of 12,675 square feet, as set forth by LAMC. The landscaped areas at the ground level would result in a more aesthetically appealing streetscape when compared to existing conditions and would contribute positively to the neighborhood.
<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>Consistent.</b> See Open Space and Conservation Chapter Policy 6.4.4 above.
<b>Economic Development Chapter</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>Consistent.</b> The Project would support this objective by providing approximately 7,200 square feet of commercial retail uses and 534,044 square feet of office uses to increase the employment base in the Project area, help meet needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality.
<b>Policy 7.2.3:</b> Encourage new commercial development in proximity to rail and bus transit	<b>Consistent.</b> The Project would develop approximately 7,200 square feet of commercial retail uses in an area

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

<b>Objective/Policy</b>	<b>Analysis of Project Consistency</b>
corridors and stations.	well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines. The Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction.
<b>Policy 7.2.5:</b> Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	<b>Consistent.</b> See Economic Development Chapter Objective 7.2 and Policy 7.2.3 above.
<b>Objective 7.6:</b> Maintain a viable retail base in the city to address changing resident and business shopping needs.	<b>Consistent.</b> See Economic Development Chapter Objective 7.2 above.
<b>Policy 7.6.3:</b> Facilitate the inclusion of shopping facilities in mixed-use developments that serve the needs of local residents and workers. If necessary, consider utilizing financing techniques such as land write-downs and density bonuses.	<b>Consistent.</b> See Economic Development Chapter Objective 7.2 above.
<b>Policy 7.9.2:</b> Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.	<b>Consistent.</b> The Project would provide 107 dwelling units in an area designated by the Community Plan as a Regional Center Commercial and in an area well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines, as well as in an area where sufficient transportation and utility infrastructures are already readily available. The Project Site also would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction. Accordingly, the Project would concentrate future residential development along a mixed-use/transit corridor within a Regional Center Commercial area, as identified in the General Plan Framework Element, to optimize the impact of the City capital expenditures on infrastructure improvements.
<b>Transportation Chapter</b>	
<b>Objective 2:</b> Mitigate the impacts of traffic growth, reduce congestion and improve air quality by implementing a comprehensive program of multi-modal strategies that encourages physical and operational improvements as well as demand management.	<b>Consistent.</b> As detailed in Section IV.J, Transportation/Traffic, of this Draft EIR, Project Design Feature TR-PDF-2 entails implementation of a Transportation Demand Management (TDM) Program, which would be beneficial to traffic flow, transit service, pedestrian circulation, and overall mobility in the Project area. The TDM Plan would include an on-site employee transportation coordinator, TDM website information, TDM promotional materials, a transit welcome package, carpool program for employees, a Guaranteed Ride Home Program for employees, public transit stop enhancements, convenient parking/amenities for bicycle riders, a local hiring program, flexible/alternative

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	work schedules, a parking cash-out program, and contributions to the City of Los Angeles Bicycle Trust Fund and LADOT Mobility Hub Program, which would further the City's goals to reduce VMT. The Project also would provide fixed-fee financial contributions towards funding traffic signal upgrades in the surrounding area pursuant to Mitigation Measures TR-MM-1 through TR-MM-4.
<b>Policy 2.11:</b> Continue and expand requirements for new development to include bicycle storage and parking facilities, where appropriate.	<b>Consistent.</b> The Project would provide 218 long-term bicycle parking spaces within the existing parking structure and 68 short-term bicycle parking spaces located outside and adjacent to the parking structure and the new building, as well as within the Metro plaza per the LAMC. Per TR-PDF-2 set forth in Section IV.J, Transportation/Traffic, bicycle parking may include bicycle racks, locked cages, or something similar. Shower facilities would be provided for employees who commute to work via bicycle. In addition, Metro may provide additional bicycle parking within the Metro plaza.
<b>Policy 3.13:</b> Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and along mixed-use boulevards; promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design.	<p><b>Consistent.</b> As discussed previously, a landscaped paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street.</p> <p>As also discussed above, the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction, would be located at the northwest corner of the Project Site. The at-grade portal would include ticket booths, kiosks, information signs, stairs, escalators, and elevators to serve the subterranean Metro station. The mixed-use building would be built above the Metro portal, with the base of level 2 essentially serving as a roof over the station entrance. A plaza surrounding the portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated and consistent with the paseo, thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street.</p>
<b><i>Mobility Plan 2035 (which implements the Framework Element Transportation Chapter)</i></b>	
<b>Policy 1.6:</b> Design detour facilities to provide safe passage for all modes of travel during times of construction.	<b>Consistent.</b> As identified in Project Design Feature TR-PDF-1 in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project includes a requirement to develop a Construction Traffic Management Plan to minimize

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	potential construction impacts to the surrounding area related to construction trucks, worker trips, and any possible sidewalk and lane closures and ensure safe passage for all modes of travel during Project construction. The Construction Traffic Management Plan would formalize how construction is carried out and identify specific actions required to reduce effects on the surrounding community. The Construction Traffic Management Plan would be based on the nature and timing of the specific construction activities for the Project and consider other projects under construction in the immediate vicinity of the Project Site.
<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.	<b>Consistent.</b> One of the primary objectives of the Project is to enhance the pedestrian activity and street life in the area by providing ground floor retail and landscaped public open spaces that work harmoniously with the future station portal for the Metro Regional Connector line that will be located on the site. Another primary objective is to incorporate the principles of smart growth and environmental sustainability by capitalizing on the Project Site's location within the established Downtown Los Angeles employment hub in proximity to transit and walkable streets.
<b>Policy 2.10:</b> Facilitate the provision of adequate on and off-street loading areas.	<b>Consistent.</b> The Project includes an off-street loading dock accessed via Spring Street to ensure deliveries can be unloaded on-site and avoid any impacts to surrounding streets during Project operation.
<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.	<b>Consistent.</b> The Project would promote this policy by providing adequate vehicular and pedestrian access and bicycle facilities, as previously discussed. In addition, the Project would be located in an area well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines. The Project Site would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction.
<b>Policy 3.2:</b> Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	<b>Consistent.</b> Any Project infrastructure in the public right-of-way would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the Americans with Disabilities Act (ADA) and the City during Project construction and operation.
<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.	<b>Consistent.</b> The Project would promote equitable land use decisions that result in fewer vehicle trips by providing new development consisting of residential, commercial retail, and office uses in proximity to jobs, destinations, and other neighborhood services in a transit-rich area.
<b>Policy 3.4:</b> Provide all residents, workers and visitors with affordable, efficient, convenient,	<b>Consistent.</b> As previously discussed, the Project would be located in an area well-served by public transit, including

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
and attractive transit services.	the on-site Metro Regional Connector station and portal, which are currently under construction, and numerous other nearby rail stations and bus lines. Thus, residents, workers, and visitors of the Project would be well-served by affordable, efficient, convenient, and attractive transit services.
<b>Policy 3.8:</b> Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	<b>Consistent.</b> See Transportation Chapter Policy 2.11 above.
<b>Policy 3.9:</b> Discourage the vacation of public rights-of-way.	<b>Consistent.</b> The Project would not involve the vacation of any public rights-of-way. Sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards for required sidewalk easement widths.
<b>Policy 4.8:</b> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	<b>Consistent.</b> As identified in Section IV.J, Transportation/Traffic, the Project would implement a TDM Program to promote peak period trip reduction by reducing dependence on single-occupancy vehicles. See Transportation Chapter Objective 2 above for further discussion.
<b>Policy 4.13:</b> Balance on-street and off-street parking supply with other transportation and land use objectives.	<b>Consistent.</b> The existing five-level parking structure located on the southern portion of the Project Site would remain and provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). The Project would require 628 tenant vehicular parking spaces per LAMC, based on bicycle parking and transit credit deductions, as well as 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2. Accordingly, surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.
<b>Policy 5.2:</b> Support ways to reduce vehicle miles traveled (VMT) per capita.	<b>Consistent.</b> The Project includes residential uses, commercial retail uses, and office uses located in a commercial corridor characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by public transportation. The Project would also promote pedestrian activity through building design and streetscape amenities and bicycling opportunities. Furthermore, the Project would implement a

**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. Therefore, the Project would support ways to reduce VMT.
<b>Policy 5.4:</b> Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	<b>Consistent.</b> While this policy applies to large-scale goals relative to fuel sources, technologies and infrastructure, the Project would facilitate the use of alternative-fuel, low-emitting, and fuel-efficient vehicles by providing parking spaces that are equipped with electric vehicle charging stations as identified in Project Design Features GHG-PDF-1 and GHG-PDF-2.
<b>Policy 5.5:</b> Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	<b>Consistent.</b> The Project would comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and stormwater reuse. As discussed in the Initial Study for the Project, included in Appendix A of this Draft EIR, BMPs would be implemented to collect, detain, and treat runoff on-site before discharging into the municipal storm drain system. Specifically, a stormwater capture and use system (i.e., harvesting system) is proposed on-site and would include a harvesting cistern with a pre-treatment settlement device to filter out trash and debris before water is used to irrigate the landscaped areas of the Project Site. The harvesting cistern capacity would exceed that required for an 85th percentile rainfall event (per LID requirements), thus providing 100 percent treatment.
<b>Infrastructure and Public Services Chapter</b>	
<b>Goal 9P:</b> Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	<b>Consistent.</b> Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting would also be used to highlight signage, architectural features, and landscaping elements throughout the Project Site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting that would minimize light trespass from the Project Site. All exterior lighting would be shielded or directed toward the areas to be lit to limit spill-over onto off-site uses. In addition, the Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. Project lighting would meet all applicable LAMC lighting standards and would adhere to the streetscape lighting standards as established by the Downtown Design Guide and the illumination standards included in the Historic Broadway Sign Supplemental Use District.
<b>Policy 9.3.1:</b> Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	<b>Consistent.</b> As discussed in Section IV.L.2, Utilities and Service Systems—Wastewater, in accordance with the wastewater reduction requirements for new non-residential and high-rise residential construction set forth in the LAMC



**Table IV.F-1 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the General Plan Framework**

Objective/Policy	Analysis of Project Consistency
	(LAMC Chapter IX, Article 9, Section 99.05.303.2), the Project would be required to demonstrate a 20-percent reduction in potable water to comply with the City of Los Angeles Green Building Code. Wastewater generated from the Project Site would be conveyed via the local collector sanitary sewer system to the Hyperion Water Reclamation Plant for treatment.
<b>Objective 9.6:</b> Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	<b>Consistent.</b> See Mobility Plan 2035 Policy 5.5 above.
<b>Objective 9.10:</b> Ensure that water supply, storage, and delivery systems are adequate to support planned development.	<b>Consistent.</b> As evaluated in Section IV.L.1, Utilities and Service Systems–Water Supply and Infrastructure, of this Draft EIR, based on LADWP’s demand projections provided in its 2015 UWMP and the Water Supply Assessment (WSA) prepared for the Project, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.
<b>Objective 9.40:</b> Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for 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.	<b>Consistent.</b> See Infrastructure and Public Services Chapter Goal 9P above.
<b>Policy 9.40.1:</b> Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	<b>Consistent.</b> See Infrastructure and Public Services Chapter Goal 9P above.
<b>Policy 9.40.2:</b> Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	<b>Consistent.</b> See Infrastructure and Public Services Chapter Goal 9P above.
<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>Consistent.</b> See Infrastructure and Public Services Chapter Goal 9P above. Furthermore, as analyzed in Section IV.A, Aesthetics (Visual Character, Views, Light-Glare, and Shading), of this Draft EIR, the Project would not result in significant lighting impacts.
<hr/> <p><i>Source: Eyestone Environmental, 2018.</i></p>	

approximately 534,044 square feet of office uses. In addition, development of the Project in an area with convenient access to public transit, including the on-site Metro Regional Connector 2nd Street/Broadway station and portal, which are currently under construction, and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled (VMT), and air pollution, while supporting the City's objective to encourage new residential uses and employment opportunities near transit.

The Project also would support the City's policy to locate and design new development that enhances the character of commercial districts by introducing a compatible mix of land uses that would be integrated with the surrounding built environment. Additionally, the Project would include streetscape improvements as well as a landscaped pedestrian paseo to enhance the pedestrian experience in Downtown. **Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Land Use Chapter.**

#### Housing Chapter

The Project would support the City's objective to provide an adequate supply of housing units of various types through the development of 107 new multi-family residential units, consisting of studio, one-, two-, and three-bedroom units. In addition, the Project would locate new multi-family housing in proximity to transit, including numerous bus lines along the adjacent streets, nearby existing and proposed Metro stations, and the on-site Metro Regional Connector 2nd Street/Broadway station and portal, which are currently under construction. **Therefore, as discussed in detail in Table IV.F-1 beginning on page IV.F-35, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Housing Chapter.**

#### Urban Form and Neighborhood Design Chapter

The Project generally would be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Urban Form and Neighborhood Design Chapter. The Project would specifically support the City's goal to create a livable City for existing and future residents by introducing a new mixed-use development that would activate the site with new residential, commercial retail, and office uses. These uses would be consistent and compatible with the mix of residential, retail, restaurant, office, and government uses surrounding the Project Site and would serve the surrounding community and businesses. In addition, the Project would incorporate elements that promote individual and community safety, including private on-site security; a closed circuit security camera system; 24-hour controlled access for the office and residential floors; security

patrols of the parking structure; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. Project lighting would include low-level exterior lights on the building and along pathways for security and wayfinding purposes and would be designed to provide for efficient, effective, and aesthetically-pleasing lighting solutions that would minimize light trespass from the Project Site. In addition, the Project's contemporary architectural design would feature pedestrian-scale improvements and ground-level amenities in order to integrate with surrounding uses in an area characterized by a high degree of pedestrian activity. **Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Urban Form and Neighborhood Design Chapter.**

#### Open Space and Conservation Chapter

The Project would include a variety of open space and recreational amenities for residents and visitors. For tenants, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents, consistent with LAMC requirements.

A landscaped paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street. The Project's landscaping would include drought-tolerant plants including both native and adaptive native plant materials.<sup>37</sup> An efficient irrigation system would be installed in all landscaped areas.

In addition, the Project would incorporate elements that promote individual and community safety throughout the Project Site, including open space areas that are well-lit

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<sup>37</sup> *Adaptive plants are not native and not invasive, but are able to thrive in the local climate and soil conditions.*

and equipped with a closed circuit camera system to allow for constant monitoring of such areas to ensure public safety and security at all times. **Therefore, as discussed in more detail in Table IV.F-1 beginning on page IV.F-35, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Open Space and Conservation Chapter.**

#### Economic Development Chapter

As presented in Table IV.F-1, the Project would support the City's objective to balance land uses through the development of a mixed-use project with residential, commercial retail, and office uses in an area well-served by public transit. The proposed commercial retail and office uses would complement the employment base (e.g., existing residential, office, hotels, and government facilities) of the Community Plan area and the Downtown Center, meet the needs of local residents, and foster continued economic investment. **Thus, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Economic Development Chapter.**

#### Transportation Chapter/Mobility Plan 2035

The Project would support the objective to mitigate the impacts of traffic growth through the implementation of a TDM Plan that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The Project also would promote the Transportation Chapter's policy regarding bicycle storage by providing a total of 218 long-term and 68 short-term bicycle spaces per the LAMC. With respect to Mobility Plan 2035, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by implementing a Construction Traffic Management Plan that incorporates safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimizes the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduces congestion to public streets and highways. The Project would ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment. The Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and bicycle facilities. Additionally, given the location of the Project Site along major transit corridors, the Project would provide all residents, guests, employees, and patrons convenient access to transit services. **Therefore, the Project would be consistent with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035 and the General Plan Framework's Transportation Chapter.**

### Infrastructure and Public Services Chapter

The Project would support the City's policy and objective to reduce the total amount of flow entering the stormwater system, as well as pursue effective and efficient approaches to protecting water quality by implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. The Project would comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and stormwater reuse. As discussed in the Initial Study for the Project, included in Appendix A of this Draft EIR, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. Specifically, a stormwater capture and use system (i.e., harvesting system) is proposed on-site and would include a harvesting cistern with a pre-treatment settlement device to filter out trash and debris before water is used to irrigate the landscaped areas of the Project Site. The harvesting cistern capacity would exceed that required for an 85th percentile rainfall event (per LID requirements), thus providing 100 percent treatment. Furthermore, as discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, 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. **Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Infrastructure and Public Services Chapter.**

**Based on the analysis above, the Project would be consistent with the relevant goals, objectives, and policies of the General Plan Framework.**

#### *(ii) Conservation Element*

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project Site is currently developed with a former surface parking lot (currently used by Metro for construction staging and excavation) and does not contain any historic resources. However, there are seven historic resources within a one-block radius of the Project Site. The seven historic resources include the Times-Plant Complex, Mirror Building, Executive Building, Higgins Building, Douglas Building, Irvine-Byrne Building, and Victor Clothing Building. As detailed in Section IV.C, Cultural Resources, the Project would have a less-than-significant impact on these historic resources. **Therefore, the Project would be consistent with the primary objective and policy regarding the protection of cultural and historic resources set forth in the Conservation Element.**

*(iii) Housing Element*

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is analyzed in Table IV.F-2 beginning on page IV.F-55. Specifically, the Project would provide a variety of housing types (i.e., studio, one-, two-, and three-bedroom units) in an area that is pedestrian-friendly and served by public transit; provide housing offerings for various income groups; and provide opportunities for residential development in an area designated as Downtown Center and Regional Center Commercial. The Project would also promote the construction of green building by incorporating sustainable design features, including energy conservation and water conservation measures, alternative transportation programs, a pedestrian- and bicycle-friendly site design, and waste reduction measures. **Accordingly, the Project would be consistent with the applicable policies set forth in the Housing Element.**

*(iv) Mobility Plan 2035*

Refer to the combined discussion of Project consistency with the General Plan Framework Element Transportation Chapter and Mobility Plan 2035, presented above. The Project's consistency with applicable policies in Mobility Plan 2035 is analyzed in Table IV.F-1 beginning on page IV.F-35.

*(v) Health and Wellness Element—Plan for a Healthy Los Angeles*

The Project would support applicable goals and objectives of the Health and Wellness Element by introducing a mixed-use development and incorporating a variety of open space areas within the Project Site in order to promote walkability and biking and contribute to the creation of a healthy community. The Project includes active and passive recreational spaces. For tenants, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents, consistent with LAMC requirements.

The Project would promote pedestrian activity and walkability by locating retail uses on the ground floor and developing a landscaped pedestrian paseo between the new building and the existing parking structure to the south. In addition, the Project would create multi-modal transit options for Project users by providing ample bicycle parking and improving the streetscape, which would enhance the pedestrian experience.

**Table IV.F-2**  
**Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021**

<b>Policy</b>	<b>Analysis of Project Consistency</b>
<b>Objective 1.1:</b> Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.	<b>Consistent.</b> The Project would develop a total of 107 residential units, consisting of studio, one-, two-, and three-bedroom units, which may ultimately consist of either condominiums or apartment units. Construction of the Project would meet a growing demand for housing in the Downtown area.
<b>Policy 1.1.3:</b> Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.	<b>Consistent.</b> The Project would result in new construction of a range of housing types (i.e., studio, one-, two-, and three-bedroom units). See also Objective 1.1 above.
<b>Policy 1.1.4:</b> Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.	<b>Consistent.</b> The Project would expand residential development opportunities in a designated Regional Commercial Center and Downtown Center, which is well-served by local and regional transit. Also see Objective 1.1.
<b>Objective 2.2:</b> Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.	<b>Consistent.</b> The Project would create a mixed-use development consisting of residential, commercial retail, and office uses. The Project would also be located in an area well-served by public transit, including multiple bus lines, four Metro rail lines, and the Metro Regional Connector 2nd Street/Broadway rail station which would be located on-site. The Project would provide bicycle parking and amenities within the Project Site to encourage alternative modes of transportation. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate sustainability features to support and promote environmental sustainability.
<b>Policy 2.2.1:</b> Provide incentives to encourage the integration of housing with other compatible land uses.	<b>Consistent.</b> The Project would provide new residential, commercial retail, and office uses to serve Project residents/tenants and the surrounding community. These uses would be compatible with and supportive of the various residential, commercial, restaurant, and entertainment uses in the area.
<b>Objective 2.3:</b> Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.	<b>Consistent.</b> As discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate environmentally sustainable design features, including those required by the Los Angeles Green Building Code. Project design features would be incorporated to reduce energy and water usage and wastewater and solid waste generation, thereby promoting the construction of a sustainable building to minimize the Project's effects on the environment and minimize the use of non-renewable resources.
<b>Policy 2.3.2:</b> Promote and facilitate reduction of water consumption in new and existing housing.	<b>Consistent.</b> As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would incorporate Project Design Feature WAT-PDF-1 to reduce water usage. More specifically, the new residential units would be equipped

**Table IV.F-2 (Continued)**  
**Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021**

Policy	Analysis of Project Consistency
	with high efficiency toilets, clothes washers, and dishwashers and low-flow kitchen/lavatory faucets and showerheads, among other water-saving devices.
<b>Policy 2.3.3:</b> Promote and facilitate reduction of energy consumption in new and existing housing.	<b>Consistent.</b> As discussed in Section IV.M, Energy Conservation and Infrastructure, of this Draft EIR, the Project would improve energy efficiency and reduce energy consumption in new housing. The Project includes Project Design Features GHG-PDF-1 and GHG-PDF-2, discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which include features to reduce energy consumption. In addition, the Project would implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips by providing incentives for using alternative travel modes.
<b>Policy 2.3.4:</b> Promote and facilitate reduction of waste in construction and building operations.	<b>Consistent.</b> As discussed in Section IV.L.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, per Project Design Feature SW-PDF-1, the Project would provide recycling containers on-site during construction, in accordance with City Ordinance No. 171,687. Furthermore, the Project would implement Project Design Features SW-PDF-2 and SW-PDF-3 to reduce construction-related solid waste generation through the use of recycled building materials and the recycling of construction and demolition debris. In particular, in accordance with SW-PDF-3, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements.  During operation, per SW-PDF-1, the Project would provide recycling containers and associated storage areas on-site during the operational phase, in accordance with City Ordinance No. 171,687. Additionally, the Project would comply with the City's Green Building Ordinance, as applicable. Furthermore, the Project would comply with the recycLA franchise system, which is now operational. Finally, with implementation of a solid waste diversion program in accordance with SW-PDF-4, the Project would achieve at least a 75 percent waste diversion rate, consistent with the AB 341 recycling goal effective in 2020, as well as the City's Green LA Plan.
<b>Objective 2.4:</b> Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.	<b>Consistent.</b> See General Plan Framework Element Land Use Chapter Policy 3.2.4 and Housing Chapter Objectives 4.1 and 4.2, addressed in Table IV.F-1 on page IV.F-35. As further discussed under Land Use Chapter Policy 3.2.4, the Project's contemporary architectural design would be integrated with the surrounding built environment. In particular, the proposed building would be similar in size and scale to other Downtown development. In addition, consistent with Housing Chapter Objectives 4.1 and 4.2, the Project would provide a mix of housing types, consisting of



**Table IV.F-2 (Continued)**  
**Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021**

Policy	Analysis of Project Consistency
	studio, one-, two-, and three-bedroom units, and encourage and promote walkability in the high-activity Project Site vicinity for a livable neighborhood.
<b>Policy 2.4.3:</b> Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces.	<b>Consistent.</b> As discussed above, the Project would incorporate Project design features to reduce energy and water consumption. The Project would include 27,765 square feet of usable common open space and 800 square feet of usable private open space. For tenants, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. See also Policies 6.3.3 and 6.4.8 of the General Plan Framework Element Open Space and Conservation Chapter in Table IV.F-1 on page IV.F-35.
Source: Eyestone Environmental, 2018.	

The Project would also incorporate elements to promote individual and community safety. Specifically, as provided in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security; a closed circuit security camera system; 24-hour controlled access for the office and residential floors; security patrols of the parking structure; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. **Therefore, the Project would be consistent with applicable goals set forth in the Health and Wellness Element.**

**Based on the analysis above, the Project would be consistent with the relevant goals, objectives, and policies of the General Plan.**

*(b) Central City Community Plan*

The Project's consistency with the objectives and policies set forth in the Community Plan is analyzed in Table IV.F-3 beginning on page IV.F-58. As discussed therein, the Project generally would be consistent with the objectives and policies that support the Community Plan's goals. In particular, the Project would support the City's objectives and

**Table IV.F-3**  
**Project Consistency with Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Analysis of Project Consistency
<b>Residential</b>	
<b>Objective 1-2:</b> To increase the range of housing choices available to Downtown employees and residents.	<b>Consistent.</b> The Project would support this objective through the development of new multi-family residential units, consisting 107 of studio, one-, two-, and three-bedroom units.
<b>Objective 1-3:</b> To foster residential development which can accommodate a full range of incomes.	<b>Consistent.</b> See Objective 1-2 above.
<b>Policy 1-3.1:</b> Encourage a cluster neighborhood design comprised of housing and services.	<b>Consistent.</b> The Project would provide new housing opportunities, commercial retail uses, and office uses in a high-density environment located along transit corridors.
<b>Commercial</b>	
<b>Policy 2-1.2:</b> To maintain a safe, clean, attractive, and lively environment.	<p><b>Consistent.</b> To promote and maintain a safe environment, the Project would incorporate various security features. Specifically, as discussed in Section IV.I.1, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security, a closed circuit security camera system, 24-hour controlled access for the office and residential floors, and security patrols of the parking structure. In addition, the Project would provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking structure, and points of entry into the building. The Project entrances to, and exits from, the building, open spaces, and pedestrian walkways would be open and in view of surrounding sites.</p> <p>To promote and maintain a clean environment, the Project would include trash receptacles and recycling bins for residents, guests, employees, and commercial patrons.</p> <p>With the addition of pedestrian and bicycle amenities, streetscape plantings, and a landscaped paseo connecting to the Metro plaza, the Project would provide and maintain an attractive and lively outdoor environment that would be compatible with the surrounding area. The Project would provide a pedestrian-oriented environment by locating high-density residential and retail uses in proximity to public transit; by providing landscape and streetscape improvements; and by introducing ground floor commercial retail uses. Project development would function harmoniously with the future Metro portal located on the Project Site, thereby enhancing pedestrian activity and street life in the area. In addition, the design of the Project would be consistent with applicable design guidelines and would further enhance the site's urban appeal and walkability. All of these elements would further contribute to a safe, clean, attractive, and lively urban</p>

**Table IV.F-3 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Analysis of Project Consistency
	environment.
<b>Policy 2-2.1:</b> Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force and businesses.	<b>Consistent.</b> The Project includes 7,200 square feet of commercial retail uses that would serve the area, and 534,044 square feet of office uses that would create job opportunities in the area. These uses would augment the employment base of the Community Plan area, meet the needs of local residents, and continue building on the strengths of the existing labor force and businesses in Downtown Los Angeles.
<b>Policy 2-2.3:</b> Support the growth of neighborhoods with small, local retail services.	<b>Consistent.</b> See Policy 2-2.1 above.
<b>Government and Public Facilities</b>	
<b>Objective 4-1:</b> To encourage the expansion and additions of open spaces as opportunities arise.	<b>Consistent.</b> The Project would provide a variety of open space areas within the Project Site, including recreational amenities for residents and office employees. As previously indicated, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents.
<b>Policy 4-4.1:</b> Improve Downtown's pedestrian environment in recognition of its important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers, and visitors.	<b>Consistent.</b> The Project's location relative to the future Metro Regional Connector station portal on-site would enhance opportunities for pedestrian/transit connections. The Project would function harmoniously with the Metro portal, providing ground floor retail adjacent to the portal entrance and incorporating a mid-block pedestrian paseo traversing the site. By increasing commute options, the provision of a high-density mixed-use building adjacent to a regional transit line would enhance the quality of life for residents, workers, and visitors and further add to the efficiency of the transit system. In addition, the Project would include sidewalk easements along Broadway, 2nd Street, and Spring Street in order to comply with the City's General Plan Mobility Plan 2035 standards. This, along with proposed landscaping and streetscaping as well as ground level building articulation, would activate the public realm, thereby improving the pedestrian environment. Overall, the Project would improve the pedestrian environment, recognizing opportunities to maximize pedestrian connections between the Metro station portal and the surrounding area.

**Table IV.F-3 (Continued)**  
**Project Consistency with Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Analysis of Project Consistency
<b>Policy 5-2.1:</b> Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.	<b>Consistent.</b> See Policy 2-1.2 above.
<b>Circulation</b>	
<b>Objective 11-4:</b> To take advantage of the district's easy access to two mass transit rail lines, the freeway system, and major boulevards that connect Downtown to the region.	<b>Consistent.</b> See Policy 4-4.1 above.
<b>Policy 11-6.1:</b> Preserve and enhance Central City's primary pedestrian-oriented streets and sidewalks and create a framework for the provision of additional pedestrian friendly streets and sidewalks which complement the unique qualities and character of the communities in Central City.	<b>Consistent.</b> See Policy 4-4.1 above.
<b>Objective 11-7:</b> To provide sufficient parking to satisfy short-term retail/business users and visitors but still find ways to encourage long-term office commuters to use alternate modes of access.	<p><b>Consistent.</b> The existing five-level parking structure located on the southern portion of the Project Site would remain and provide the required vehicular parking and long-term bicycle parking for the proposed uses. More specifically, the existing 1,460 parking spaces within the garage would be reconfigured to provide 1,436 vehicular spaces and 218 long-term bicycle parking spaces (plus an additional 68 short-term bicycle parking spaces to be provided outside and adjacent to the parking structure and the new building, as well as within the Metro plaza). The Project would require 628 tenant vehicular parking spaces per the LAMC, based on bicycle parking and transit credit deductions, as well as 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2. Accordingly, surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.</p> <p>As previously discussed, the Project would also include a TDM Plan to reduce vehicle trips and VMT, and the future Metro Regional Connector 2nd Street/Broadway station would be located on-site. See Policy 2-1.2 above for further discussion.</p>
<hr/> <p><i>Source: Eyestone Environmental, 2018.</i></p>	

policies to coordinate the development of the Central City area with that of other parts of the City and metropolitan area and to provide housing to satisfy the varying needs and desires of all economic segments of the Community Plan area through the development of new residential, commercial retail, and office uses in Downtown Los Angeles. The Project's 107 studio, one-, two-, and three-bedroom units would provide needed housing in the Central City Community Plan area.

To maintain and promote a safe environment, the Project would incorporate elements that promote individual and community safety. As previously discussed, the Project would include private on-site security; a closed circuit security camera system; 24-hour controlled access for the office and residential floors; security patrols of the parking structure; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. To promote a clean environment, the Project would include trash receptacles and recycling bins for residents, guests, employees, and commercial patrons. With the addition of pedestrian and bicycle amenities, streetscape plantings, and a landscaped paseo connecting to the Metro plaza, the Project would provide and maintain an attractive and lively outdoor environment that complements the surrounding area. Furthermore, the Project would provide a variety of recreational and open space areas within the Project Site, including recreational amenities for residents and employees. For tenants, amenity decks offering a variety of social and community spaces would be provided on levels 8, 15, 19, and 27 and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. A total of 27,765 square feet of usable common open space and 800 square feet of usable private open space would be provided for Project residents, consistent with LAMC requirements.

In addition, the commercial retail and office uses would augment the employment base of the Community Plan area, thus meeting the needs of local residents and continuing to build on the strengths of the existing labor force and businesses in Downtown Los Angeles.

**Based on the above and as presented in Table IV.F-3 beginning on page IV.F-58, the Project would be consistent with the general intent of the Community Plan.**

*(c) Redevelopment Plan for the City Center Redevelopment Project*

As previously indicated, CRA/LA Resolution No. 16 clarifies that the Redevelopment Plan's land use designation and associated land use regulations shall defer to and be superseded by the applicable General Plan, Community Plan, and Zoning Ordinance land use designations and regulations, which are addressed throughout this analysis. Nonetheless, the Project is subject to review by CRA/LA for conformance with the Redevelopment Plan.

The Project would comply with relevant development standards set forth in the Redevelopment Plan. Specifically, the Project's FAR of 5.83:1 (including the Metro portal) would fall below the maximum FAR of 6:1 established for the Historic Downtown Sub-Area. Additionally, Project signage would not include billboards or supergraphics; in fact, Project signage would comply with the stricter standards set forth in the Broadway Sign District, as discussed below. Table IV.F-4 beginning on page IV.F-63 evaluates the Project's consistency with the relevant objectives from the Redevelopment Plan and demonstrates the Project's general conformance with the Plan. **As presented in Table IV.F-4, the Project would be consistent with the general intent of the Redevelopment Plan.**

*(d) Los Angeles Municipal Code*

The Project Site is zoned [Q]C2-4D-CDO-SN (Qualified Commercial 2, Height District 4 with Development "D" limitation, Broadway Theater and Entertainment District Community Design Overlay, Historic Broadway Sign Supplemental Use District). The proposed uses are permitted within the C2 zone, and the Project's total FAR of 5.83:1 (including the Metro portal on-site) would be below the allowable FAR of 6:1 for Height District 4 with the applicable D limitation. There is no applicable building height limitation.

As previously indicated, development within the Broadway Theater and Entertainment District CDO is governed by [Q] conditions that prohibit certain types of land uses, particularly on the ground floor along the streetwall; dictate building form and massing, including building heights and setbacks along the streetwall, lot coverage requirements for buildings over 150 feet in height, and ground floor treatments; and specify the location of parking and mechanical equipment. The Project Applicant requests a Vesting Zone Change per LAMC Sections 12.32 G and 12.32 Q to amend Ordinance No. 180,871 to eliminate or modify [Q] Condition No. 7, which requires a 30 percent minimum and 40 percent maximum lot coverage for the portion of a building over 150 feet in height, in order to reflect the Project's design. According to the DCP Staff Report for Ordinance No. 180,871, the purpose of [Q] Condition No. 7 is to provide flexibility while ensuring appropriate tower separation on the small infill lots that are characteristic of the Broadway corridor. However, at 2.7 acres in size, the Project Site is not only large for the Broadway corridor, but large for Downtown's urban context. As a result, application of the subject [Q]

**Table IV.F-4  
Project Consistency with Applicable Objectives of the City Center Redevelopment Plan**

Objective	Analysis of Project Consistency
1. To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.	<b>Consistent.</b> The Project is an infill development that would revitalize an underutilized site (i.e., a former surface parking lot) by providing a high-density mixed-use development with residential, office, and ground floor commercial retail uses in proximity to existing and future transit lines, employment opportunities, shops, restaurants, and entertainment uses. In addition, the Project's contemporary architectural design would feature pedestrian-scale improvements and ground-level amenities in order to integrate with surrounding uses in an area characterized by a high degree of pedestrian activity.
2. To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.	<b>Consistent.</b> The Project would support the development of Downtown as a major center through its contemporary and distinct design. As demonstrated throughout this analysis, the Project would be consistent with applicable goals, policies, and regulations set forth in relevant plans, including the General Plan Framework and Central City Community Plan.
3. To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.	<b>Consistent.</b> The Project would provide needed housing in an area projected for population growth. As detailed in Section IV.H, Population, Housing, and Employment, of this Draft EIR, the Project's population and employment growth would be well within SCAG's projections for the 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.
4. To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.	<b>Consistent.</b> The Project would support this objective by providing approximately 7,200 square feet of commercial retail uses and 534,044 square feet of office uses to increase the employment base in the Project area, help meet needs of local residents, generate tax revenues for the City, and foster continued economic investment. Refer to Section IV.H, Population, Housing, and Employment, of this Draft EIR for related discussion.
5. To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.	<b>Consistent.</b> Although this objective is aimed at agency-level activities, the Project would nonetheless support it. Refer to the discussion of Objectives 1 and 2, above.  The provision of housing and street-fronting commercial uses would provide for a vibrant urban area and enhance the livability of the neighborhood. The pedestrian paseo that would connect Broadway and Spring Street and provide pedestrian linkages to the Metro portal in the northwest portion of the Project Site would serve to enhance the neighborhood. The Project would also

**Table IV.F-4 (Continued)**  
**Project Consistency with Applicable Objectives of the City Center Redevelopment Plan**

Objective	Analysis of Project Consistency
	maximize development density adjacent to a regional transit connector, which would further enhance livability. In addition, the building façade articulation and proposed landscaping would contribute to a visually appealing streetscape and would improve the quality of the public realm by promoting pedestrian activity and further activating the streets. Overall, the uses and improvements proposed by the Project would enhance the urban lifestyle in the Project vicinity.
6. To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.	<b>Consistent.</b> Refer to the discussion of Objectives 1, 3, 4, and 5 above. The Project would provide a pedestrian-oriented environment by locating high-density residential and retail uses in proximity to public transit; by providing landscape and streetscape improvements; and by introducing ground floor commercial retail uses. Project development would function harmoniously with the future Metro portal located on the Project Site, thereby enhancing pedestrian activity and street life in the area. In addition, the design of the Project would be consistent with applicable design guidelines and would further enhance the site's urban appeal and walkability. All of these elements would further contribute to a safe, clean, attractive, and lively urban environment.
7. To create a symbol of pride and identity which gives the Central City a strong image as the major center of the Los Angeles region.	<b>Consistent.</b> Although this objective is aimed at agency-level activities, the Project would nonetheless support it. Refer to the discussion of Objectives 1 and 2, above.
8. To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through and out of the Central City.	<b>Consistent.</b> Although this objective is aimed at agency-level activities, the Project would nonetheless support it. Development of the Project in an area with convenient access to public transit, including the on-site Metro Regional Connector 2nd Street/Broadway station and portal, which are currently under construction, and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution, while supporting other City objectives to encourage new residential uses and employment opportunities near transit.
9. To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees, and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric.	<b>Consistent.</b> In addition to open space and recreational amenities for Project tenants, the Project would provide a variety of publicly-accessible open space areas within the Project Site, including a landscaped paseo which would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. The Project also would enhance pedestrian activity through



**Table IV.F-4 (Continued)**  
**Project Consistency with Applicable Objectives of the City Center Redevelopment Plan**

Objective	Analysis of Project Consistency
	building design and proposed streetscape amenities by providing ground level neighborhood-serving commercial retail uses, some of which would open on to the Metro plaza on-site. In addition, street trees and streetscape plantings would be introduced along Broadway and Spring Street. Also refer to the discussion of Objectives 5 and 6, above.
12. To provide a full range of employment opportunities for persons of all income levels.	<b>Consistent.</b> Refer to the discussion of Objective 4, above.
13. To provide high and medium density housing close to employment and available to all ethnic, social and economic groups, and to make an appropriate share of the City's low- and moderate-income housing available to residents of the area.	<b>Consistent.</b> The Project would provide new housing opportunities, commercial retail uses, and office uses in a high-density environment. More specifically, the Project would develop a total of 107 residential units, consisting of studio, one-, two-, and three-bedroom units, which may ultimately consist of either condominiums or apartment units. Construction of the Project would meet a growing demand for housing in the Downtown area, which would be available to people of all ethnic, social and economic groups.
15. To establish an atmosphere of cooperation among residents, workers, developers, business, special interest groups and public agencies in the implementation of this Plan.	<b>Consistent.</b> Although this objective is aimed at agency-level activities, the Project would nonetheless support it. The Project's environmental review and entitlement process has included various meetings and consultations with City planners, agency representatives, community stakeholders, and neighbors in a cooperative effort to ensure a high-quality and compatible development.
<hr/> Source: <i>Eyestone Environmental</i> , 2018.	

condition would result in an unintended consequence (i.e., over-sized tower floorplates). Specifically, as the lot area of the Project Site is 118,051 square feet, application of [Q] Condition No. 7 would result in floorplates for portions of the tower above 150 feet in height of between 35,415 and 47,220 square feet. Floorplates of this size are impractically large and do not meet industry standards for either residential or office buildings. Eliminating the lot coverage constraints would allow for a more slender architectural tower design, resulting in the preservation of views of the sky as intended by [Q] Condition No. 7.

The Project would not include any of the prohibited land uses set forth in Ordinance No. 180,871 and would meet all other [Q] conditions regulating building form and massing, ground floor treatment, parking, urban design, and mechanical equipment (signage conditions are superseded by the Broadway Sign District, discussed below). The Project

also would require approval of a Design Overlay Plan per LAMC Section 13.08 E for development in the Broadway CDO, thus ensuring consistency with the [Q] conditions.

In addition, the proposed building footprint would comply with the 5-foot Building Line established along Broadway by Ordinance No. 75,667. Moreover, the Project would undergo Site Plan Review per LAMC Section 16.05, which is required for projects with a net increase of 50,000 square feet of non-residential floor area or a net increase of 50 or more dwelling units. This process would further ensure compliance with applicable land use regulations.

With regard to LAMC parking requirements, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would require 628 tenant vehicular parking spaces per LAMC Section 12.21 A 4(p), based on bicycle parking and transit credit deductions, as well as 0.25 spaces per residential unit of guest parking pursuant to Advisory Agency Parking Policy 2006-2.<sup>38</sup> The existing five-level parking structure located on the southern portion of the Project Site would remain and be reconfigured to provide 1,436 vehicular parking and long-term bicycle parking for the proposed uses. Accordingly, surplus parking would remain available for the nearby Los Angeles Times Square buildings located on the north side of 2nd Street (subject to several off-site parking covenants recorded on the Project Site), as well as for lease to other uses in the area.<sup>39</sup> The Project would also provide 218 long-term and 68 short-term bicycle parking spaces on-site per the LAMC. Therefore, the Project would comply with applicable LAMC parking requirements.

As discussed in more detail in Section IV.I.5, Public Services—Parks and Recreation, of this Draft EIR, LAMC Section 12.21 G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 12,675 square feet of usable open space, as shown in Table IV.I.5-2 in Section IV.I.5, Public Services—Parks and Recreation. The Project would provide a total of approximately 27,765 square feet of common usable open space, consisting of both indoor and outdoor open space for residents, and approximately 800 square feet of private usable open space in the form of balconies. Thus, the Project would

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<sup>38</sup> *Parking requirements, including required bicycle parking and credit reductions, are based on LAMC Sections 12.21.A4 (Off-Street Automobile Parking Requirements), 12.21.A4(i) (Exception Downtown Business District), 12.21.A4(k) (Fractional Space), 12.21.A4(p) (Exception for Central City Area), 12.21.A4(x)(3) (Exception for Specified Exception Areas), and 12.21.A16(a)(2) (Bicycle Parking for Commercial Uses).*

<sup>39</sup> *Off-site parking covenants per County of Los Angeles Recorder Instrument Nos. 90-2043634, 97-1672752, 98-854779, and 05-1924091. Accordingly, under the covenants a total of 69 parking spaces (67 regular spaces and 2 handicap spaces) would be set aside.*

meet and exceed the LAMC's requirement for the provision of usable open space. Additional LAMC open space requirements and associated fee requirements are addressed in Section IV.I.5, Public Services—Parks and Recreation, as well.

**Based on the above, the Project would be consistent with applicable LAMC requirements.**

*(e) Broadway Theater and Entertainment District Design Guide*

The Broadway Design Guide sets forth guidelines and standards for development along a six-block portion of Broadway between 2nd Street and Olympic Boulevard, as well as on adjacent parcels, including the Project Site. The guidelines and standards that address new construction reinforce the existing historic development patterns of the Broadway corridor and provide a site planning framework for infill projects. As discussed in detail Appendix E of this Draft EIR, the Project would support and generally be consistent with the Broadway Design Guide. Specifically, the Project would incorporate an innovative and contemporary design that would complement the Broadway corridor's historic elements (refer to Section IV.A, Aesthetics (Visual Character, Views, Light/Glare, and Shading), of this Draft EIR for further discussion of design/visual compatibility with the nearby historic resources). The proposed building would incorporate variations in building planes and other architectural features to reduce the effect of massing and provide a pedestrian scale adjacent to public streets. Overall, the height and massing of the building would shift away from Broadway toward Spring Street. The Project would further promote pedestrian activity by providing ground floor commercial retail uses and a landscaped pedestrian paseo traversing the site from Broadway to Spring Street, which would be integrated with the Metro plaza. Appropriate signage, lighting, and landscaping would be incorporated to complement the Broadway corridor.

**Based on the above and as presented in Appendix E of this Draft EIR, the Project generally would comply with the standards and guidelines established by the Broadway Design Guide.**

*(f) Broadway Streetscape Master Plan*

The Broadway Streetscape Master Plan provides a vision for improvements to the Broadway corridor's public realm and includes an array of design tools, criteria, and streetscape elements. The Streetscape Plan also includes a materials palette and guidelines for locating such materials along Broadway. Pursuant to the Streetscape Plan, street trees introduced as part of the Project would be planted at approximately 20-foot intervals where possible and would include species recommended in the Streetscape Plan. Existing street light locations would be retained, with new street lights added, as necessary. Any new street lights would be replicas of the historic street lights. The Project would also

include a landscaped paseo in a “pedestrian paseo opportunity” area identified in the Streetscape Plan. As called for in the Plan, the paseo would provide a pedestrian connection between Broadway and Spring Street, as well as to and from the Metro portal. Materials and wayfinding elements would be consistent with those identified in the Streetscape Plan and would complement the surrounding area without adding visual clutter.

**Based on the above, the Project would be consistent with the vision and goals established in the Broadway Streetscape Master Plan.**

*(g) Historic Broadway Sign Supplemental Use District*

The Broadway Sign District encompasses the Broadway Theater and Entertainment District CDO and parcels fronting intersecting streets from 1st Street to 12th Street, which includes the Project Site. As previously discussed, the Broadway Sign District regulations include general standards, illumination standards, and specific design, size, and location standards for various types of signs. The Project would include a variety of signs, including general ground level and wayfinding pedestrian signage around the perimeter of the building and in the paseo, informational signs associated with the parking structure, and building and tenant identification signs. Exterior wayfinding signs would be located at access points to the on-site parking garage, paseo, and commercial and residential entries. Metro signage would be integrated with the overall signage concept. No off premises billboard advertising is proposed as part of the Project.

Project signage would comply with the general standards outlined in the Broadway Sign District including those related to materials, maintenance, and sign type. With regard to the illumination standards, illuminated Project signage would be designed, located, and/or screened so as to minimize light trespass onto the exterior walls of residential units and windows of commercial buildings. In addition, the Project would adhere to all of the illumination standards regarding nighttime brightness and maximum total lumen output, and no signs would use highly reflective materials such as mirrored glass. Furthermore, the Project would comply with the specific design, location, and size standards for each type of sign (e.g., awning signs, building identification signs, information signs, pedestrian signs, wall signs, window signs), as outlined in the Broadway Sign District.

**Based on the above, the Project would be consistent with the vision and goals established in the Historic Broadway Sign Supplemental Use District.**

*(h) City of Los Angeles Walkability Checklist*

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 Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use use projects. The Walkability Checklist addresses 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 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 and open space; creating a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (i.e., street trees along Broadway, and Spring Street); providing adequate sidewalk widths (sidewalk easements would be provided along Broadway, 2nd Street, and Spring Street in compliance with the City's Mobility Plan 2035 standards); and incorporating closely planted shade-producing street trees.

The Walkability Checklist strategies regarding crosswalks and street crossings are aimed at maximizing safety and convenience. While the Project does not include crosswalks or street crossings, appropriate curbs would be provided at the corners of 2nd Street/Broadway and 2nd Street/Spring Street to facilitate safe pedestrian movement, including pedestrian and bicycle access to the Metro portal on-site. In addition, a sidewalk easement would be provided on the Project Site along Spring Street where the Project's curbside drop-off area is planned.

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, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, sufficient off-street parking would be provided to meet applicable LAMC parking requirements.

The objective of the Walkability Checklist's 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 and utility areas within the 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 buildings and the street as a means of improving neighborhood character and the pedestrian environment. In accordance with the recommended implementation strategies, the Project would designate grade level entrances from the public right-of-way for pedestrians. In addition, given the Project's location above the future Metro Regional Connector 2nd Street/Broadway rail station, the Project's design would be integrated with the on-site Metro portal, and building entrances would be located to create a direct path from the transit stop so as to facilitate access and pedestrian traffic flow. In addition, with the building sited near the property line along 2nd Street and Spring Street, the primary building entrances would be visible from adjacent streets and accessible from the sidewalks. Along Broadway, where the building would be set back from the roadway to accommodate the Metro portal, an "outdoor room" would be created via the plaza, incorporating planted areas, benches and café seating, and bicycle parking. With respect to the ground floor commercial retail uses, multiple public entrances would be maintained with doors unlocked during regular business hours and designed in compliance with Americans with Disabilities Act (ADA) guidelines. The Project includes a paseo connecting Broadway and the Metro portal to Spring Street, thereby incorporating a mid-block passageway to facilitate pedestrian movement through the Project area. The paseo would incorporate canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, permeable paving, and appropriate lighting, thus creating a visually interesting, comfortable, and safe pedestrian environment. Finally, the Project would use architectural features to provide continuity along the street frontage where openings in the building wall occur.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining the continuity of the sidewalk; accommodating vehicle access to and from the site with as few driveways as possible; incorporating architectural features on parking structure façades that respond to the neighborhood context and contribute to "placemaking;"; illuminating all parking areas and pedestrian walkways; and using architectural features to provide continuity along the street frontage where openings in the building wall occur.

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 introduce substantial landscaping and streetscaping on and adjacent to the Project Site. In so doing, the Project would achieve the following implementation strategies: providing canopy trees in planting areas in addition to the street trees; providing planting that complements pedestrian movement or views; and providing planting that complements 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 discussed above, 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 the building façade through articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; discouraging blank walls; including overhead architectural features, such as awnings, canopies, trellises or cornice treatments, that provide shade and reduce heat gain; contributing to neighborhood safety by providing windows at the street that act as “eyes on the street;” devoting 75 percent of façades for ground floor retail uses to pedestrian entrances and pedestrian-level display windows; and utilizing the building wall for security between the structure and the street, eliminating the need for fences at the street.

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: including signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to building entrances; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are “dark sky” compliant.

**Based on the Project elements described above 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.**

*(i) Consistency with Regional Plans—2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*

The Project's general consistency with the applicable goals and principles set forth in the 2016–2040 RTP/SCS is analyzed in Table IV.F-5 beginning on page IV.F-73. **As described therein, the Project would be generally consistent with the applicable goals and principles set forth in the 2016–2040 RTP/SCS.**

*(j) Conclusion Regarding Land Use Impacts Related to Regulatory Consistency*

**Based on the analysis above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to Threshold (b) and land use policy consistency would be less than significant.**

***Threshold (c): Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?***

As discussed in Section VI, Other CEQA Considerations, and the Initial Study (Appendix A of this Draft EIR), the Project Site would not conflict with any applicable habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized area and does not support any habitat or natural community, and no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Project Site. **Thus, the Project would have no impact with respect to Threshold (c). The Project would not conflict with the provisions of an adopted habitat conservation or natural community conservation plan, and no further analysis is required.**



**Table IV.F-5**  
**Project Consistency with Applicable Goals and Principles of SCAG's 2016–2040 Regional**  
**Transportation Plan/Sustainable Communities Strategy**

Goals and Principles	Analysis of Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	<p><b>Consistent.</b> Although this goal applies at a regional level, the Project would be developed in an existing urbanized area with an established network of roads and freeways that provide local and regional access, including to the Project Site. The Project Site is currently served by four Metro rail lines and 11 local and inter-city transit operators, including Metro LADOT DASH, Antelope Valley, Big Blue Bus, Commerce Bus, Gardena Bus, Montebello Bus, Santa Clarita, Foothill Transit, OCTA, and Torrance Transit Service. In addition, the Project Site would house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction. Additional Metro Regional Connector stations are under construction at 2nd Street/Hope Street and 1st Street/Central Avenue, which are both within a 0.5-mile radius of the Project Site. Furthermore, the Project would provide 218 long-term and 68 short-term bicycle parking spaces for residents and visitors. The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a designated SCAG HQT<sup>40</sup> and a City of Los Angeles TPA, as defined in ZI No. 2452. In summary, the Project would maximize mobility and accessibility by providing opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking.</p>
Ensure travel safety and reliability for all people and goods in the region.	<p><b>Consistent.</b> As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project does not include any hazardous design features that could pose safety issues to travelers. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections.</p> <p>Furthermore, during construction, temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions, would be provided to direct traffic around any closures as required in the Construction Traffic Management Plan (see Project Design Feature TR-PDF-1 in Section IV.J, Transportation/Traffic, of this Draft EIR). Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access or access to emergency routes. Appropriate construction traffic control</p>

<sup>40</sup> Los Angeles County Metropolitan Transportation Authority (Metro), "High Quality Transit Areas—Southwest Quadrant."

**Table IV.F-5 (Continued)**  
**Project Consistency with Applicable Goals and Principles of SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy**

Goals and Principles	Analysis of Project Consistency
	measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g. bicycling and walking).	<p><b>Consistent.</b> Refer to the discussion under “Maximize mobility and accessibility for all people and goods in the region,” above.</p> <p>As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would implement a TDM program that would include strategies to promote non-automobile travel (i.e., active/non-motorized transportation, such as bicycling and walking) and reduce the use of single-occupant vehicle trips, thereby facilitating a reduction in vehicle miles traveled and improved air quality, which would contribute to the protection of the environment and the health of the community's residents. As identified in Section II, Project Description, and Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the Project would include specific design features to support and promote environmental sustainability. These features include energy conservation, water conservation, and waste reduction. With implementation of regulatory requirements and Project design features, impacts related to air and GHG emissions, which directly relate to the environment and the health of the City's residents, would be less than significant.</p>
Encourage land use and growth patterns that facilitate transit and active transportation.	<p><b>Consistent.</b> The Project would introduce a new mixed-use development along primary transit corridors/boulevards. As discussed above, the Project would be located in an area well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines. The Project Site would also house the Metro Regional Connector 2nd Street/Broadway rail station and portal, which are currently under construction. In addition, the Project would provide 218 long-term and 68 short-term bicycle parking spaces. As such, the Project would provide opportunities for the use of alternative modes of transportation, thereby encouraging the use of transit and non-motorized transportation.</p>
<hr/> <p><i>Source: Eyestone Environmental, 2018.</i></p>	

## 4. Cumulative Impacts

Cumulative growth in the greater Project area includes 173 specific known development projects as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. These related projects primarily include retail/commercial, residential, office, and hotel uses. Much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan Update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing. According to the DTLA 2040 projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.<sup>41</sup>

The related projects generally consist of infill development and redevelopment of existing uses, which is encouraged by the land use policies for the Downtown area. As with the Project, the related projects as well as development associated with the Community Plan Update would be required to comply with relevant land use policies and regulations. **Therefore, as the Project would generally be consistent with applicable land use plans, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts with regard to regulatory framework would not be cumulatively considerable, and cumulative impacts would be less than significant.**

As it relates to land use compatibility, the proposed developments comprise a variety of uses, including residential, office, restaurant, retail, school, and 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 (Related Project Nos. 3, 7, 22, 41, 78, and 133, which propose residential, retail, restaurant, and government uses), as well as with existing uses in the immediate area. 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 area and provide sufficient infrastructure and amenities to serve the growing population. Such related projects are not expected to fundamentally alter the existing land use relationships in the community but, rather, would concentrate development on particular sites and promote a synergy between existing and new uses. Furthermore, the Project's proposed mix of residential, commercial retail, and office uses would be compatible with surrounding land uses. **Thus, the Project would not have a cumulatively considerable impact with**

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<sup>41</sup> Growth projections current as of December 2018. Source: City of Los Angeles, DTLA 2040, About This Project, [www.dtl2040.org/](http://www.dtl2040.org/), accessed December 6, 2018.

respect to land use compatibility. As such, the combined land use compatibility impacts associated with the Project's incremental effect and the effects of other related projects would not be significant.

## **5. Mitigation Measures**

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

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

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