

## **IV. Environmental Impact Analysis**

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### **D. Land Use and Planning**

#### **1. Introduction**

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

The Project's potential impact related to the potential physical division of an established community was fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR.

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

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

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

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). These plans are described below.

###### *(a) Southern California Association of Governments 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, is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals 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.”<sup>1</sup> 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. Further, it balances the region’s future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning in order to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS).<sup>2</sup> 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.

On September 3, 2020, SCAG’s Regional Council adopted its 2020–2045 RTP/SCS, Connect SoCal (referred to as Connect SoCal or 2020–2045 RTP/SCS). On October 30, 2020, the California Air Resources Board (CARB) made the determination that the 2020–2045 RTP/SCS would meet the region’s GHG reduction target. Connect SoCal’s core vision is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to reach the region’s GHG reduction goals. As was the case under the prior RTP/SCS,<sup>3,4</sup> the Project Site is located within an HQTA as designated by the 2020–2045 RTP/SCS.<sup>5</sup>

The Project’s consistency with applicable goals of the 2020–2045 RTP/SCS for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below. A detailed list of the goals of the 2020–2045 RTP/SCS applicable to the Project Site is included in Table 1 of Appendix D of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal.

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<sup>1</sup> SCAG 2016–2040 RTP/SCS, p. iv.

<sup>2</sup> SCAG 2016–2040 RTP/SCS, p. 166.

<sup>3</sup> SCAG 2016–2040 RTP/SCS, Exhibit 5.1: High Quality Transit Areas In The SCAG Region For 2040 Plan, p. 77.

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

<sup>5</sup> SCAG, Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Priority Growth Area - High Quality Transit Areas (2045), Exhibit 3.8.

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

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and State air pollution standards. In conjunction with SCAG, the SCAQMD has prepared the 2016 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.A, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the AQMP.

**(2) Local**

Several plans, policies, 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). The Central City Community Plan (Community Plan) constitutes the local land use policy standard for the Project Site and Community Plan area. In addition, the Project is subject to the Downtown Design Guide (DDG), Downtown Street Standards and the Citywide Design Guidelines. 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, which is a comprehensive long-term document that provides principles, policies, and objectives to guide future development.

The City's General Plan is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development. The General Plan sets forth goals, objectives, and programs to guide land use policies and to 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, Conservation, 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 composed of 35 area plans known as Community Plans that guide land use at the community level. 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 for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

(1) 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 broadly described by ranges of intensity/density, heights, and lists of typical uses. These land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. They are intended to serve as a guideline for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City.<sup>6</sup> The Project Site is located within the designated Downtown Center as identified by the Framework Element.<sup>7</sup> The 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.*

<sup>6</sup> Chapter 1 of the Framework Element 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 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. Specific land use designations are determined by the community plans." 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.

<sup>7</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.



## (2) Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element 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 through a number of measures:

- 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.

## (3) Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element 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.

## (4) 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.

## (5) Economic Development Chapter

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining

commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods, and retaining industrial land uses on appropriate sites.

#### (6) Transportation Chapter

As an update to the prior Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 in August 2015. Mobility Plan 2035 was readopted in January 2016 and again in September 2016 upon consideration of additional amendments.<sup>8</sup> Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035. Refer to Subsection 2.a.(1)(a)(ii) below for a discussion of the Mobility Plan.

#### (7) Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element 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.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project Site is included in Table 2 of Appendix D of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

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<sup>8</sup> Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016*.

*(ii) 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: safety first; world class infrastructure; access for all Angelenos; collaboration, communication, and informed choices; and clean environments and healthy communities.<sup>9</sup>

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 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project is included in Table 3 of Appendix D of this Draft EIR along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy.

*(iii) Los Angeles General Plan Housing Element*

Adopted in December 2013, the Housing Element 2013–2021 of the City’s General Plan (Housing Element) identifies four primary goals and associated objectives, policies and programs. The goals are as follows:

- 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.

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<sup>9</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.*

The Project's consistency with the applicable objectives and policies set forth in the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the objectives and policies of the Housing Element applicable to the Project Site is included in Table 4 of Appendix D of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular objective or policy.

*(iv) Los Angeles General Plan Conservation Element*

The General Plan includes a Conservation Element (Conservation Element), which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. In particular, Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage, while Section 15 calls for the protection of natural and scenic vistas as aesthetic resources.

The Project's consistency with applicable policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

*(v) Los Angeles 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 Plan for a Healthy Los Angeles 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. The Plan for a Healthy Los Angeles accomplishes two policy objectives: (1) elevates existing health-oriented policies in the General Plan; and, where policy gaps exist, (2) creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan for a Healthy Los Angeles identifies seven primary goals and identifies new policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. The goals relate to the following: health and equity; development that supports physical, mental, and social well-being; parks and open space; healthy food resources; promoting a healthy environment; education and economic prosperity; and safe and just neighborhoods.

Although most of these goals apply at a regional- or citywide-level, the Project's consistency with applicable policies in the Plan for a Healthy Los Angeles adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below.

*(b) Central City Community Plan*

The Project Site is located within the Central City Community Plan Area. Last updated in 2003, 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 Framework Element. The Central City Community Plan identifies and provides for economic opportunities and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Central City Community Plan Area.

The Central City Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:

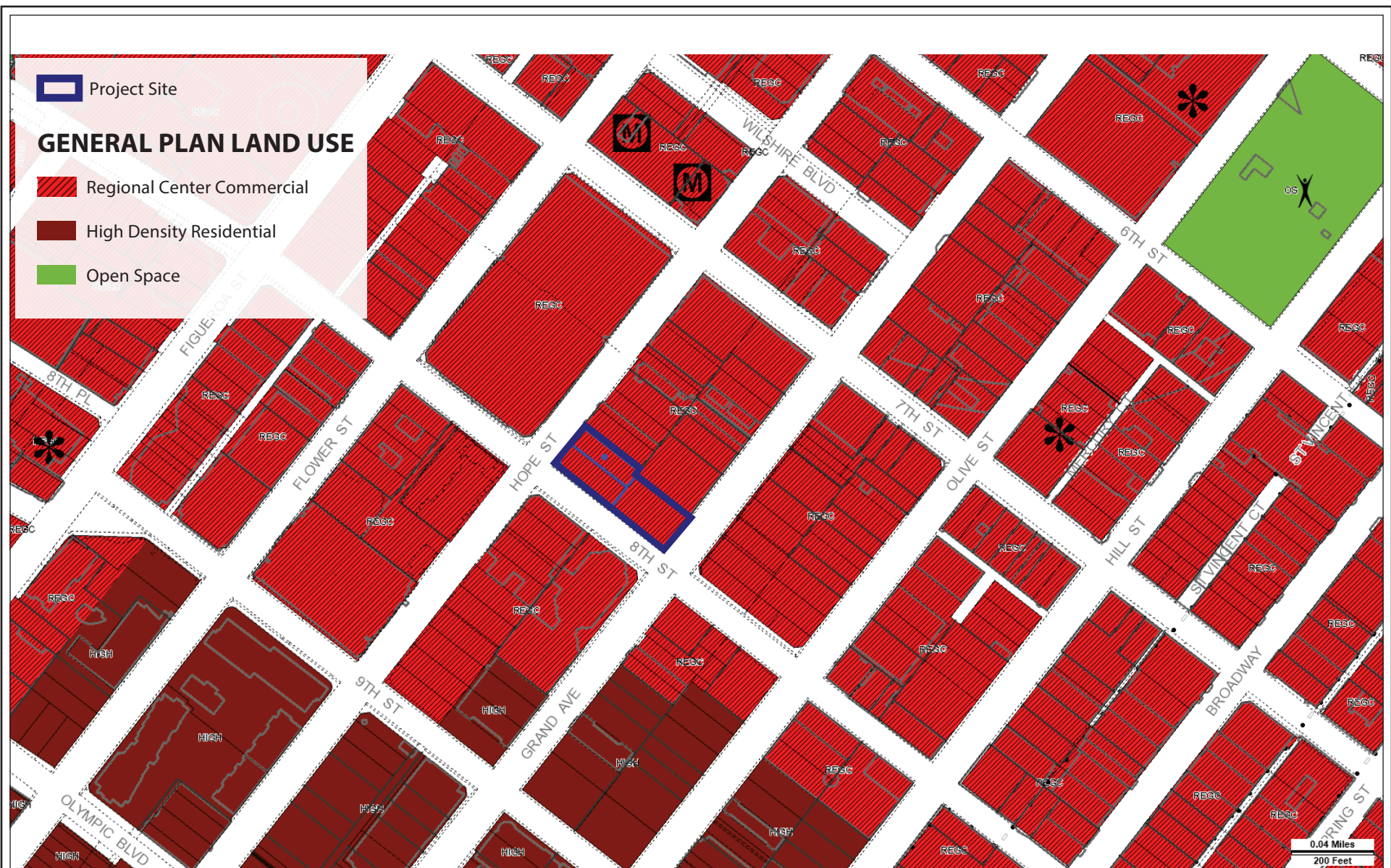
- Creating residential neighborhoods; while providing a variety of housing opportunities with compatible new housing;
- Improving the function, design and economic vitality of the commercial districts;
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance;
- Maximizing the development opportunities of the future rail transit systems while minimizing adverse impacts; and
- Planning the remaining commercial and industrial development opportunity sites for needed job producing uses that improve the economic and physical condition of the Central City Community.

Pursuant to the Central City Community Plan, the land use designation for the Project Site is Regional Center Commercial, as shown in Figure IV.D-1 on page IV.D-10. The Project's consistency with applicable goals, objectives, and policies in the Central City Community Plan adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below. A detailed list of the goals, objectives and policies of the Central City Community Plan applicable to the Project Site is included in Table 5 of Appendix D of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

*(i) Central City Community Plan Update (DTLA 2040 Plan)*

It should also be noted that the City of Los Angeles Department of City Planning (DCP) is currently updating the Central City Community Plan and the Central City North Community Plan, whose areas together make up Downtown Los Angeles (sometimes





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

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 Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.<sup>10</sup> Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:<sup>11</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

Project Site is currently designated as Regional Center Commercial by the existing adopted Central City Community Plan. Under the DTLA 2040 Plan, the Project Site is currently proposed to be designated as part of the Transit Core, which would allow a base floor area ratio (FAR) of 9:1 and a maximum FAR of 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.<sup>12</sup> The DTLA 2040 Plan proposes the following description of the Transit Core area:<sup>13</sup>

*Transit Core areas are dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form ranges from Moderate Scale to High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and*

<sup>10</sup> City of Los Angeles, *Downtown Los Angeles Community Plan Update*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed September 15, 2021.

<sup>11</sup> City of Los Angeles, *Downtown Los Angeles Community Plan Update*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed September 15, 2021.

<sup>12</sup> Los Angeles Department of City Planning, *Downtown Community Plan Update, Fall 2020 Draft*.

<sup>13</sup> Los Angeles Department of City Planning, *Downtown Community Plan Update, Fall 2020 Draft*.

*entertainment uses makes these places centers of activity around the clock.  
The residential density of the Transit Core is limited by floor area.*

The DTLA 2040 Plan will be the first Community Plan to apply new zoning as part of the City's comprehensive Zoning Code update. The DTLA 2040 Plan will inform developers and homeowners of allowable development options, densities, and intensities, outline strategies for how to accommodate planned growth. 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. In 2019 and 2020, City Planning released the draft policy documents as well as proposed land use and zoning updates. The DTLA 2040 Plan Draft Environmental Impact Report was published in 2020 and was followed by a public comment period. Subsequently, a virtual public hearing was held on December 8, 2020. The DTLA 2040 Plan was approved by the City Planning Commission (CPC) on September 23, 2021, and has not yet been adopted by the City Council. Note that as the DTLA 2040 Plan has not been adopted and the Project includes a Vesting Tentative Tract Map (VTTM), the current adopted Central City Community Plan is the local adopted community plan that is evaluated in the impact analysis below.<sup>14</sup>

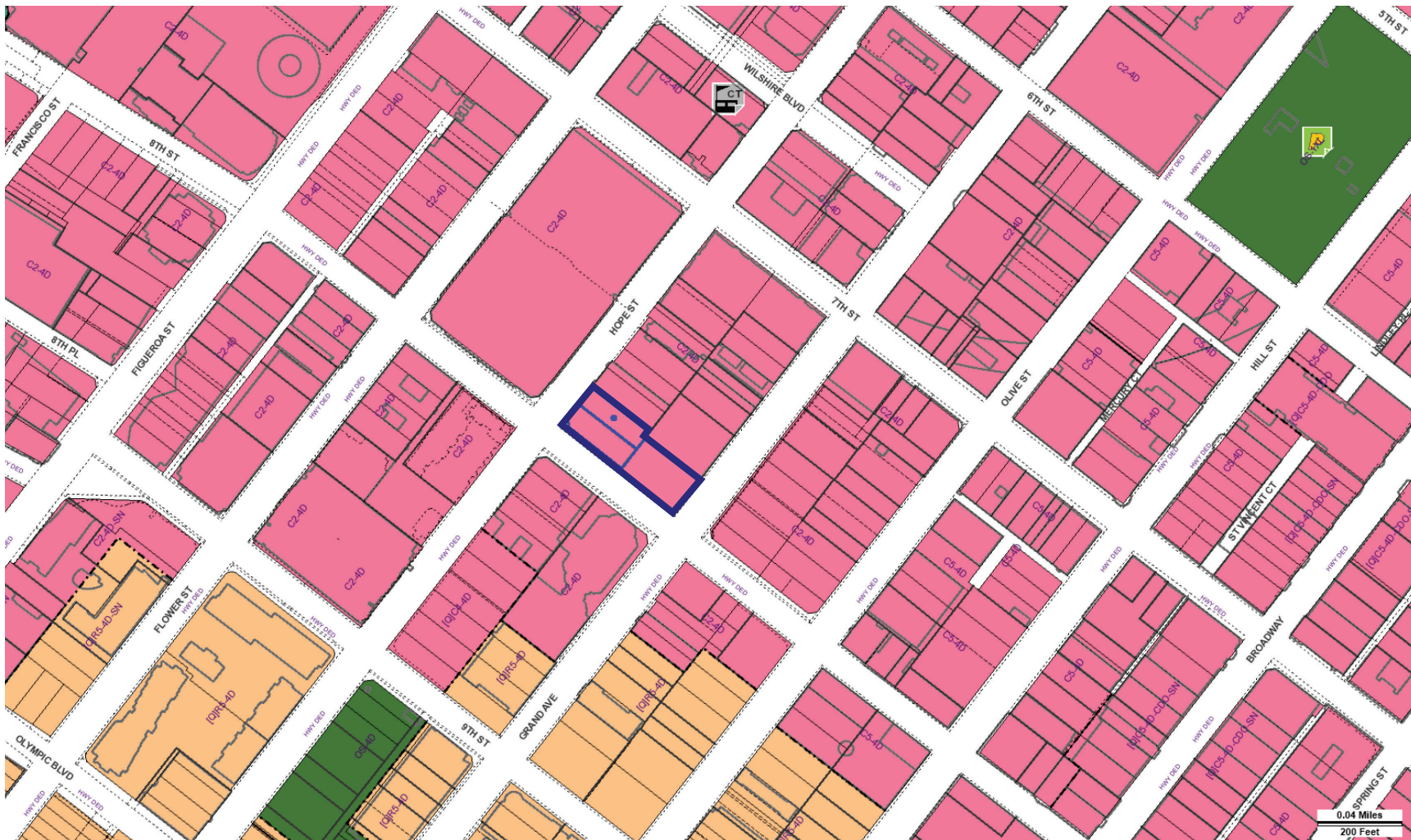
#### *(c) Los Angeles Municipal Code*

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.D-2 on page IV.D-13, the Project Site is designated by the LAMC as C2-4D (Commercial Zone, Height District 4 with Development Limitations). The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1. However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6:1 without a transfer of floor area rights (TFAR), pursuant to Ordinance No. 164,307.

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<sup>14</sup> LAMC Section 17.15-C,1 states that: "The approval or conditional approval of a vesting tentative map shall confer a vested right to proceed with development in substantial compliance with the ordinances, policies and standards in effect on the date the application is deemed complete, and with the conditions of approval imposed and specifically enumerated by the Advisory Agency, including the submittal of a detailed grading plan under an approved grading permit prior to recordation of the final map. Such rights shall not include exemptions from subsequent changes in the Building and Safety and Fire regulations contained in Chapters V and IX of the Los Angeles Municipal Code and policies and standards relating thereto."





## GENERALIZED ZONING

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|---|---|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #e91e63; border: 1px solid black; margin-right: 5px;"></span> C2, C4, C5 | <span style="display: inline-block; width: 15px; height: 15px; background-color: #2e7d32; border: 1px solid black; margin-right: 5px;"></span> OS |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #ff9800; border: 1px solid black; margin-right: 5px;"></span> R5         | <span style="display: inline-block; width: 15px; height: 15px; border: 2px solid blue; margin-right: 5px;"></span> Project Site                   |

**Figure IV.D-2**  
Zoning Designations for the Project Site and Vicinity

(d) *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 and relevant policies from the Framework Element and Community Plans.<sup>15</sup> The Citywide Design Guidelines were established in order to carry out common design objectives that maintain neighborhood form and character while promoting design excellence and innovative development solutions. The Citywide Design Guidelines are not intended to supersede the LAMC and/or other regulatory documents such as specific plans and overlays. Community plans and specific plans can also contain design guidelines that better address the specific needs of different geographic areas and communities. As such, in cases where the Citywide Design Guidelines conflict with a provision in a Community Plan's Urban Design chapter, specific plan, overlays, or other local design guidelines, the community-specific requirement will prevail.<sup>16</sup> Additionally, as stated in the Citywide Design Guidelines, although each of the objectives and corresponding 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 creativity encouraged to achieve excellency in design."<sup>17</sup> The City's Urban Design Studio, which is part of the Department of City Planning, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals.<sup>18</sup>

In October 2019, the City Planning Commission adopted a new set of Citywide Design Guidelines that consolidates the guidelines into a single document in order to establish a more efficient and effective design review process. The new set includes adopted City policies and up-to-date design solutions that were not considered in the 2011 version, and input from different City departments such as the Department of Building and Safety, Bureau of Engineering, Cultural Affairs, and the Mayor's Sustainability and

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<sup>15</sup> As stated in the Citywide Design Guidelines, such guidelines apply to all areas, but is particularly applicable to those areas within the City that do not have adopted design guidelines. In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan's Urban Design chapter, specific plan, overlays, or other local design guidelines the community specific requirement shall prevail. Therefore, as the Project is located within the boundaries of the Downtown Design Guide Map, the Project would be required to conform to the provisions of the Downtown Design Guide.

<sup>16</sup> City of Los Angeles Department of City Planning, Citywide Design Guidelines, adopted by the City Planning Commission on October 24, 2019.

<sup>17</sup> City of Los Angeles Department of City Planning, Citywide Design Guidelines, October 24, 2019, p. 9.

<sup>18</sup> City of Los Angeles Department of City Planning, Urban Design Studio, [planning.lacity.org/urbandesign/](http://planning.lacity.org/urbandesign/), accessed May 19, 2020.

Resiliency teams.<sup>19</sup> The new set also now incorporates the goals and policies of the 2008 City of Los Angeles Walkability Checklist Guidance for Entitlement Review.<sup>20</sup>

These new Citywide Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. These design guidelines are then followed by a set of best practices that illustrate different ways to satisfy the guidelines. The best practices are organized into three spatial categories: Site Planning, Building Design, and Right-of-Way. The best practices are not mandatory but provide examples of how guidelines can be achieved. Projects are encouraged to utilize any combination of the best practices or an alternative design solution to achieve the intent of each guideline.

The Project's consistency with the guidelines adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

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

On April 24, 2009, the Los Angeles City Council approved a General Plan Amendment to the Central City Community Plan to revise Chapter V of the Central City Community Plan text to incorporate the DDG. The DDG was created to implement common design objectives that maintain neighborhood form and character while promoting design excellence, creative infill development solutions, and sustainable development practices and innovations. As such, the DDG encourages the development of an increasingly livable and sustainable Downtown community. The DDG focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The successful treatment of these key features, coupled with particular attention to the details of a project within the first 30 to 40 vertical feet, forms the basis for providing high quality development at a human scale. The updated DDG was adopted by the City Planning Commission in June 2017 as an official guide for development within the Downtown area. The Project's consistency with applicable standards and guidelines in the DDG adopted for the purpose of avoiding or mitigating an environmental effect is included in Table 6 of Appendix D and discussed in the impact analysis below.

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<sup>19</sup> City of Los Angeles City Planning Commission, Recommendation Report, Case No. CPC-2019-1098-MS, October 24, 2019.

<sup>20</sup> City of Los Angeles Department of City Planning staff previously used the Walkability Checklist to assess projects seeking discretionary approval for new construction. The primary goal was to consider the applicable Walkability Checklist guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm.

*(f) 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 (Chapter IX, Article 9, of the LAMC); Los Angeles Department of Water and Power 2015 Urban Water Management Plan; Sustainable City pLAn/L.A.'s Green New Deal; Los Angeles Fire Department (LAFD) Strategic Plan; Los Angeles Public Library (LAPL) Strategic Plan 2015–2020; Public Recreation Plan; 2010 Bicycle Plan (a part of the General Plan's Mobility Plan 2035); 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.

## **b. Existing Conditions**

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

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is located at 754 S. Hope Street and 609 and 625 W. 8th Street in the City of Los Angeles. The Project Site encompasses a total of approximately 34,679 square feet of existing lot area (0.80 acre). With the merger, the lot area is 36,178 square feet (0.83 acre). The Project Site is currently developed with a low-rise four-level parking structure and a surface parking lot that is entirely paved and devoid of landscaping. The existing parking structure and surface parking lot currently provide 324 parking spaces, which are used for commercial parking by businesses in the area.<sup>21</sup> Vehicular access for the existing commercial parking structure and surface parking lot is currently provided from four existing driveways with four existing curb cuts: one existing curb cut along Grand Avenue, two existing curb cuts along 8th Street, and one existing curb cut along Hope Street. A chain-link fence lines two sides of the parking lot along 8th Street and Grand Avenue. One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street.

The Project Site is located within the planning boundary of the Central City Community Plan and is designated as Regional Center Commercial. The entire Project Site is zoned as C2-4D (Commercial, Height District No. 4 with Development Limitation).

As identified by the City's Zone Information and Map Access System (ZIMAS) the Project Site is also located within the DDG Project Area, Transit Priority Area (TPA), Greater Downtown Housing Incentive Area, Adaptive Reuse Incentive Area, former Los

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<sup>21</sup> A total of 34 spaces for an adjacent building located at 611 W. 6th Street are included in covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248).

Angeles State Enterprise Zone, and Transit Oriented Communities Area.<sup>22,23,24</sup> The Project Site is also located within an HQTAs as designated by SCAG.<sup>25</sup>

## (2) Surrounding Uses

The Project Site is located in an urbanized area dominated by mid- to high-rise buildings. Surrounding uses in the vicinity of the Project Site are similarly zoned C2-4D and developed with commercial, office, retail, restaurant, multi-family residential, and parking uses. Immediately to the north of the Project Site are two parking structures—an eight-story structure along Hope Street and a four-story structure along Grand Avenue. Across Hope Street to the west of the Project Site is a parking structure and business/commercial development (i.e., The Bloc), consisting of a department store, Sheraton Grand Hotel, gym, cinema, retail and restaurant uses, and an office tower at 700 S. Flower Street and 711 S. Hope Street. To the east of the Project Site is a mixed-use development (i.e., Eighth & Grand), consisting of a mid-rise residential complex with a ground floor market at 788 S. Grand Avenue. To the south of the Project Site are multiple office/commercial buildings and other residential developments, including a high-rise residential tower (i.e., 8th+Hope) immediately to the southwest at 801 S. Hope Street, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier at 801 S. Olive Street; 845 S. Olive Street Tower; and 820 S. Olive/825 S. Hill Street Tower) to the southeast on Olive Street between 8th Street and 9th Street. In the Project vicinity, beyond these land uses are other high-rise buildings that include commercial and residential uses.

<sup>22</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope Street and 609 and 625 W. 8th Street 8, <http://zimas.lacity.org/>, accessed April 29, 2020.

<sup>23</sup> PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

<sup>24</sup> On July 11, 2013, California Governor Edmund G. Brown Jr. signed legislation that resulted in the repeal of the Enterprise Zone Act and the dissolution of Enterprise Zones. However, the City Council adopted an action on December 18, 2013 that approved the continuation of the reduced parking provision for former Enterprise Zone areas.

<sup>25</sup> SCAG 2020–2045 RTP/SCS, Connect SoCal, Exhibit 3.8: Priority Growth Areas—High Quality Transit Areas.

### 3. Project Impacts

#### a. Thresholds of Significance

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

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

***Threshold (b): Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

As discussed below, the Project's potential impact regarding the physical division of an established community set forth in Threshold (a) was evaluated in the Initial Study included in Appendix A of this Draft EIR and impacts were determined to be less than significant. For the analysis of consistency with plans, the analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate land use consistency:

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

#### b. Methodology

The determination of whether the Project conflicts with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect is based upon a review of the previously identified plans, policies, and regulations that are applicable to the Project Site and were adopted to mitigate or avoid an environmental effect. State CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

*...if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.*

Analysis of potential conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. As discussed in the Office of Planning and Research (OPR), State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, 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. Further, 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, but need not be in perfect conformity with every plan policy.<sup>26</sup>

### c. Project Design Features

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

### d. Analysis of Project Impacts

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

Land use compatibility or the physical division of an established community was evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR (also refer to Section VI., Other CEQA Considerations, of this Draft EIR). As discussed therein, the Project Site is located in a highly urbanized area. The Project would replace the existing low-rise four-level parking structure and surface parking lot on-site with a new mixed-use project comprised of 580 residential units and up to 7,499 square feet of

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<sup>26</sup> *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

commercial/retail/restaurant uses. The proposed uses are consistent with types of land uses already present or under construction in the surrounding area. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, as determined in the Initial Study, the Project would not physically divide an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Therefore, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.

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

**(1) Impact Analysis**

***(a) Consistency with Regional Plans***

***(i) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy***

The Project's general consistency with the applicable goals set forth in the SCAG RTP/SCS is discussed in Table 1 of Appendix D of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. The Project would support the goals of the RTP/SCS to improve the productivity of the region's transportation system and to improve mobility, accessibility, reliability, and travel safety for people and goods. The Project would also support the RTP/SCS goals to support an integrated regional development pattern and transportation network, reduce greenhouse gas emissions and improve air quality. The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of rail and bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG HQTAs and TPAs, as defined by PRC Section 21099. In addition, the Project would provide 251 bicycle parking spaces and would enhance pedestrian activity in the area by providing improved sidewalks and human-scale commercial/retail/restaurant frontages on the ground floor. The Project would be designed with LEED Certified or equivalent green building standards (refer to Project Design Feature GHG-PDF-1 in Section IV.C. Greenhouse Gas Emissions) and would feature vehicle parking spaces equipped with electric vehicle (EV) charging stations as well as additional facilities capable of supporting future electric vehicle supply equipment (EVSE). As such, the Project would support development of diverse housing types in areas that are supported by multiple transportation options. The Project would



maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with the applicable goals of the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

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

The SCAQMD is responsible for developing plans for ensuring that air quality in the South Coast Air Basin conforms with federal and State air pollution standards. In conjunction with SCAG the SCAQMD has prepared the 2016 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. As further detailed and analyzed in Section IV.A, Air Quality, of this Draft EIR, the Project would not conflict with the applicable policies set forth in SCAQMD's AQMP.

*(b) Consistency with Local Plans and Applicable Policies*

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, including the Framework Element, Housing Element, Conservation Element, Mobility Plan 2035, the Los Angeles Health and Wellness Element; the Central City Community Plan; LAMC; Citywide Design Guidelines; and DDG that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

*(i) Los Angeles General Plan*

(1) General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix D of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

*(a) Land Use Chapter*

The Framework Element's Land Use Diagrams designate districts, centers and mixed-use boulevards. As discussed above, the Project Site is located in an area that is identified as the Downtown Center on the Framework Element's Long Range Land Use

Diagram for the City's Metro area. The Project would support the applicable goals, objectives, and policies of the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by replacing a parking structure and surface parking lot with a contemporary high-rise development with 580 residential units and up to 7,499 square feet of ground floor, neighborhood-serving commercial/retail/restaurant uses. The Project would support the City's policy to provide for the siting and design of new development that enhances the character of commercial districts by introducing a mixed-use development within the Project Site that would feature a similar mix of land uses to the existing uses surrounding the Project Site. As such, the Project would create additional housing to meet a growing demand in the Downtown Center, provide short- and long-term employment opportunities, and would be consistent with the type of development that is envisioned for the Downtown Center. In addition, the Project's mix of uses, sidewalk design and landscaping improvements in an area with convenient access to public transit and opportunities for walking and biking would promote a safe and improved pedestrian environment and facilitate a reduction of vehicle trips and vehicle miles traveled.

Therefore, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

*(b) Housing Chapter*

The Project would support the City's goal to provide an equitable distribution of housing opportunities by type and costs by providing a mixed-use development that would include a variety of new multi-family residential units, including 108 studios, 258 one-bedroom units, 66 one-bedroom units with dens, 143 two-bedroom units, and five two-bedroom plus den or three-bedroom units. The Project would therefore also support and not conflict with the City's objective to plan the capacity for and develop incentives to encourage production of housing units of various types to meet the projected housing needs of the future population by introducing a range of new multi-family residential units to a site that currently only provides parking uses. The Project would also support the City's objective to encourage the location of new multi-family housing in proximity to transit by locating a mix of multi-family housing types in an area well-served by public transit. The Project Site is located approximately two blocks from the Metro 7th Street/Metro Center Station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. The Project Site and vicinity within a 0.25-mile radius is currently served by a total of seven local and inter-city transit operators. Metro also operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the

area. Additional transit lines within the Study Area include nine LADOT Commuter Express lines, five LADOT Downtown Area Short Hop (DASH) bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. Therefore, the Project would not conflict with the applicable goal and objectives set forth in the Framework Element's Housing Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

*(c) Urban Form and Neighborhood Design Chapter*

The Project would promote the applicable goals and objectives of the Urban Form and Neighborhood Design Chapter by introducing a new mixed-use development that would activate the existing site. Specifically, the Project would redevelop an existing parking structure and surface parking lot by providing a modern residential building with ground floor commercial retail and restaurant uses that are in close proximity to transit stations and lines. The Project would also incorporate elements that promote individual and community safety such as security cameras; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel and reduce areas of concealment; and designing entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Therefore, the Project would not conflict with the applicable objective that supports the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

*(d) Open Space and Conservation Chapter*

The Project would promote the goals and objectives of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. The Project would contribute to the open space system by providing open space and recreational amenities for Project residents. The Project would provide 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, 8,596 square feet of outdoor covered open space, and 28,100 square feet of private balcony space. The Project is requesting a site-specific Zoning Administrator's Interpretation (ZAI) to count and credit the Project's 8,596 square feet of covered exterior open space towards the Project's common open space requirement. Specifically, the Project would provide indoor and outdoor common open space in a tiered terrace arrangement, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. Private balconies serving residential units begin on Level 3 of the Project, the first level that

includes residential units. These proposed open spaces would be provided on-site and privately managed. As such, the Project would serve to reduce the demand on parks and recreational facilities in the vicinity of the Project Site. Therefore, the Project would not conflict with the applicable objectives that support the goals set forth in the Framework Element's Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(e) Economic Development Chapter

The Project would support the City's objective to establish a balance of land uses through the development of a mixed-use project with residential and commercial/retail/restaurant uses in an area well-served by public transit. The proposed neighborhood-serving commercial/retail/restaurant uses would foster continued economic investment and complement the employment base (e.g., existing residential, office, hotels, and entertainment venues) of the Central City Community Plan area and the Downtown Center, and provide amenities to meet the needs of local residents. In addition, the Project Site would have 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. Thus, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(f) Infrastructure and Public Services Chapter

Project construction activities would occur in accordance with City grading permit regulations and National Pollutant Discharge Elimination System (NPDES) requirements to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would implement on-site filtration and infiltration drywells in accordance with the Low Impact Development Ordinance to collect, detain, treat, and discharge runoff on-site, which would minimize the discharge of pollutants in stormwater runoff. Furthermore, as provided in the Project's Water Supply Assessment and Section IV.I, 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. In addition, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

## (2) Mobility Plan 2035

The Project's general consistency with the applicable policies set forth in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 3 of Appendix D of this Draft EIR. As discussed therein and in Section IV.G, Transportation, of this Draft EIR, the Project would support the plan's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan and Worksite Traffic Control Plan. Pursuant to Project Design Feature TR-PDF-1, the plans would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. In addition, the Project would ensure high quality pedestrian access in all site planning and public right-of-way modifications. Vehicular access to the Project Site for residents would be provided on Hope Street and Grand Avenue. Service, delivery, and trash collecting vehicles would access the Project Site from Hope Street and would exit on Grand Avenue. An on-site porte-cochère would be located in the center of the Project Site for pick-up and drop-off. Visitors, taxis, and rideshare vehicles would enter the Project Site from either Hope Street or Grand Avenue, access the porte cochère, and exit via Grand Avenue. As such, vehicular loading and drop-off would occur within the building's parking structure, and the Project's circulation activities would provide a safe and comfortable walking environment.

As also detailed in Section IV.G, Transportation, of this Draft EIR, the Project would comply with Mobility Plan 2035 and the Downtown Street Standards along Hope Street and Grand Avenue. Along Hope Street, the Project would meet the 28-foot half roadway width and would dedicate three feet to meet the required 43-foot half right-of-way width and 15-foot sidewalk width. The Project would also provide a 3-foot average sidewalk easement on Hope Street. Along Grand Avenue, the Project would meet the 45-foot half right-of-way width, 28-foot half roadway width, 17-foot sidewalk width, and 7-foot average sidewalk easement requirements. Along 8th Street, the Project would provide a 6-foot average sidewalk easement, which exceeds the 5-foot requirement, and a 12-foot sidewalk width, but would seek a two-foot waiver of dedication and improvements on the west side of 8th Street and a 10-foot waiver of dedication and improvements on the east side of 8th Street through the Project's VTTM. The half roadway width would remain 23 feet rather than the required 33 feet, and the half right-of-way width would be 35 feet. The Project would therefore provide a wider sidewalk along 8th Street, and would maintain the consistency of the roadway curb line and the number of traffic lanes with the block east of the Project Site. To the west of the Project Site, the half-roadway width increases to 33 feet between Hope Street and Flower Street but then reduces back to 23 feet between Flower Street and Figueroa Street. The waivers would still allow the City to meet its mobility needs. As discussed above, LADOT has determined that the required street widening would not be necessary as the required street widening would not enhance the

existing circulation system and there would be no loss in the standard sidewalk width, and has recommended waiving the widening.<sup>27</sup> Pedestrian access to the Project Site and surrounding areas would be maintained and improved with the expansion and reconstruction of the existing sidewalk, which would provide access from the site to nearby amenities and public transportation. Pedestrians crossing 8th Street would have a shorter distance to cross and wider sidewalks to walk on, therefore addressing safety and mobility needs for pedestrians.

Overall, pedestrian access to the Project Site and surrounding transit-rich area would be maintained and improved with the expansion and reconstruction of the existing sidewalk. Furthermore, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle parking facilities. The Project Site is also located within the Central City Parking District (LAMC Section 12.21-A,4(p)) and the Exception Downtown Parking District (LAMC Section 12.21-A,4(i)), which are areas with reduced parking requirements created by City Council. As discussed above, the Project is located approximately two blocks from the 7th Street/Metro Center Rail Station and is within the vicinity of numerous bus lines provided by Metro, LADOT, Foothill Transit, Orange County Transportation Authority, Santa Monica Big Blue Bus line, and Torrance Bus. Thus, the Project would encourage alternative modes of transportation and support the reduction of vehicle trips. Therefore, the Project would be consistent with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect.

### (3) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies and objectives set forth in the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 4 of Appendix D of this Draft EIR. As discussed therein, the Project would expand opportunities for residential development in a designated Downtown Center and Regional Center Commercial area by providing a variety of housing types (i.e., studio, one-, two-, and three-bedroom units). Specifically, the Project would develop 580 new multi-family residential units, consisting of 108 studios, 258 one-bedroom units, 66 one-bedroom units with dens, 143 two-bedroom units, and five two-bedroom with den or three-bedroom units. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating the Project in a designated HQTAs and TPAs, with transit options including the 7th Street/Metro Center Station and numerous bus lines. As such, the Project would promote housing within an urbanized area that is pedestrian-friendly and well-served by public transit. The Project would also promote the

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<sup>27</sup> Email communication from LADOT (Wes Pringle) to Department of City Planning (Polonia Majas), February 11, 2020. See Appendix G of this Draft EIR.

construction of green buildings by incorporating sustainable design features, including energy conservation, water conservation, a pedestrian- and bicycle-friendly site design, and waste reduction measures. As explained below, the Project is requesting a TFAR which requires the provision of public benefits. A portion of the required benefits for a TFAR may be allocated towards affordable housing or other public benefits.<sup>28</sup> Therefore, the Project would not conflict with the applicable objectives and policies set forth in the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect.

#### (4) Los Angeles General Plan Conservation Element

As identified in Subsection 2.a.(2)(a)(iv), the Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources. The Project's consistency with this objective and this policy is analyzed below.

As discussed in the Initial Study, which is included as Appendix A of this Draft EIR, the Project Site is currently developed with a parking structure and a surface parking lot that is entirely paved and devoid of landscaping. One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street. The Project Site does not include protected trees. As part of the Project along the street frontage, the street trees would be removed, and a row of street trees would be planted along 8th Street, Hope Street, and Grand Avenue. These trees would be selected in coordination with the City of Los Angeles Department of Urban Forestry.

Due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. As such, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and

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<sup>28</sup> *Transfer of Floor Area Rights—Central City Community Plan and City Center Redevelopment Project Areas, LAMC Section 14.5.3 Definitions: Public Benefits means amenities provided to the public including, but not limited to, providing for affordable housing; public open space; historic preservation; recreational, cultural, community and public facilities; job training and outreach programs; local hiring; payment of prevailing wages; affordable child care; streetscape improvements; sustainability features; public arts programs; homeless services programs; or public transportation improvements.*

surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site.

In addition, as detailed in the Initial Study, which is included as Appendix A of this Draft EIR, the Project would include mitigation measures to ensure that impacts to archaeological and paleontological resources would be less than significant. Specifically, the Project would include periodic inspections of excavation and grading activities performed by a qualified archaeologist and a qualified paleontologist to ensure that if archaeological and/or paleontological resources are encountered, proper evaluation, salvaging, and surveying of such materials shall occur with implementation of recommended actions before ground-disturbing activities can resume on-site.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect.

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

As identified in Subsection 2.a.(2)(a)(v), the Health and Wellness Element includes the goal to 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. Under this goal, the Health and Wellness Element includes a policy to reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health. The Project's close proximity to nearby retail, restaurants, and jobs would promote pedestrian and transit accessibility by way of the 7th Street/Metro Center Station (two blocks from the Project Site) and the numerous bus lines within the vicinity. The Project would also further encourage alternative transportation choices by providing bicycle racks along Hope Street and Grand Avenue and within the Project Site's ground and subterranean levels. As such, the Project would support the Health and Wellness Element's efforts to reduce vehicle use through implementation of smart growth mixed land use patterns, which would support the reduction of air pollution. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.



### (6) Central City Community Plan

The Project's general consistency with the objectives and policies set forth in the Central City Community Plan and adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 5 of Appendix D of this Draft EIR.

The Project would increase the range of housing choices available to Downtown employees and residents. by removing a parking structure and surface parking lot and introducing 580 new multi-family residential units and neighborhood-serving commercial/retail/restaurant uses. These uses would complement the employment base of the Central City 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. The Project's close proximity to the 7th Street/Metro Center Station and numerous bus lines would also encourage use of public transit, and the provision of bicycle parking areas would promote bicycle use. Ground level uses would also feature extensive windows and continuous balconies. The balconies would be situated and would project into the right-of-way at a lower elevation of 25 feet above grade to activate the street and sidewalk and introduce a human scale element and visual interest to pedestrians. Furthermore, as previously discussed, the Project would be located in a designated HQTAs and TPAs and would include street improvements to comply with the requirements of Mobility Plan 2035. As such, the Project would provide opportunities to improve Downtown's pedestrian environment and circulation, and reduce parking demand and VMT by encouraging use of alternative modes of transportation available in the immediate vicinity of the Project Site.

To maintain and promote pedestrian safety, the Project would include, but not be limited to, a closed circuit security camera system; proper lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify secure routes; Project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways designed, to the extent practicable, to be open and in view of surrounding site. To promote a clean environment, the Project would include numerous trash receptacles and recycling bins for residents, guests, employees, and commercial patrons. To provide and maintain an attractive and lively environment, the Project would redevelop an existing site occupied by a parking structure and surface parking with a modern-style, mixed-use building that would complement the surrounding area.

Based on the above and as presented in Table 5 in Appendix D of this Draft EIR, the Project would not conflict with the applicable objectives and policies of the Central City Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

*(ii) Los Angeles Municipal Code*

The Project is a mixed-use development that consists of 580 residential units and up to 7,499 square feet of neighborhood-serving commercial/retail/restaurant uses. The proposed uses would be located within a high-rise, 50-story building with above and below ground parking and a maximum building height of 592 feet. Upon completion, the Project would have a total floor area of up to 554,927 square feet and a total FAR of 9.25:1.<sup>29</sup>

Under the existing land use designation and zoning, the Project would be consistent with the allowable uses under C2-4D zoning. The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also allows any land use permitted in the C1.5 and C1 zones, which, in turn, allow R4 and R3 Multiple Dwelling zones, which include multiple dwelling units. Height District 4 within the C2 zone does not impose any height limit with a maximum FAR of 13:1. However, the maximum permitted floor area of the Project Site is restricted by the “D” development limitation, which limits the FAR to 6 times the buildable area of the lot (6:1) without a transfer of floor area pursuant to Ordinance 164,307. Per Footnote No. 3 of the Central City Community Plan, Regional Commercial land uses with Height District 4-D are limited to a 6:1 FAR, except for transfer of floor area up to 13:1. Per LAMC Section 14.5.3, for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way.

For the purpose of calculating the maximum floor area rights through the TFAR, the existing lot area (34,679 square feet) is used in addition to the area between the exterior lot lines of the Project Site to the centerline of the street. The sum of both areas which totals 60,022 square feet (Buildable Area) is applied. With a FAR of 6:1, the Project Site’s lot area of 34,679 square feet would permit a total floor area of approximately 208,074 square feet. Pursuant to LAMC Section 14.5.6, the Applicant is requesting approval of a TFAR to the Project Site (Receiver Site) from a Donor Site which, in this case, is the City-owned Los Angeles Convention Center at 1201 South Figueroa Street. With a FAR of up to 13:1 through the TFAR, the Project Site would be permitted a total floor area of approximately 780,286 square feet. Through the TFAR, the Project would request approximately 346,853 square feet of additional total floor area to increase the floor area of the Project to 554,927 square feet for a FAR of 9.25:1. As such, the Project with the TFAR would exceed the base FAR of 6:1 but would result in a FAR that is less than the maximum 13:1 FAR allowed by the Community Plan in Height District No. 4 through TFAR. In addition, and in

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<sup>29</sup> *The Project’s FAR is calculated based on buildable area measured to the center line of the street, which is approximately 60,022 square feet.*

accordance with LAMC Section 14.5.9, the Project would provide a Public Benefit Payment as a result of the TFAR to serve a public purpose.

The Project would also involve the request for approval of a Vesting Tentative Tract Map (VTTM) pursuant to LAMC Section 17.15 in order to merge three (3) existing lots and portions of the public right-of-way, including: i) eight feet along the west side of 8th Street; ii) corner cuts on both sides of 8th Street; iii) a limited dedication of three feet along Hope Street; iv) to re-subdivide the land into one ground lot and nine airspace lots; and v) to waive the 2-foot and 10-foot street dedications along the west side and east side of 8th Street, in order to maintain the 23-foot half-roadway and provide for the 12-foot required sidewalk, through the VTTM. LADOT has determined that the required street widening would not be necessary as the required street widening will not enhance the existing circulation system and there will be no loss in the standard sidewalk width, and has recommended waiving the widening.<sup>30</sup> Furthermore, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and bicycle parking facilities.

Per the Greater Downtown Housing Incentive Area Ordinance, LAMC Section 12.22-C,3(a), Project density is not subject to a lot area limitation. The TFAR request is allowable under the Project Site's "D" development limitation, and, with its approval, the Project's FAR would comply with LAMC zoning requirements. The proposed density complies with LAMC zoning requirements under the Greater Downtown Housing Incentive Area Ordinance and the Central City Community Plan.

As previously discussed, the Project is subject to the 2017 DDG. Per the Greater Downtown Housing Incentive Area Ordinance, LAMC Section 12.22-C,3(a), no yard requirements apply to the Project Site, except as required by the DDG. As detailed further below, the DDG dictates that retail streets in the Financial Core, such as the portions of Hope Street and Grand Avenue adjacent to the Project Site, include setbacks of 0 to 3 feet. In addition, pursuant to LAMC Section 12.22-A,30.C(e), the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 DDG to allow for projections over the sidewalk to begin at a lower elevation of 25 feet above grade in lieu of the minimum 40 feet above grade requirement as outlined in the DDG. Refer to the DDG analysis below for further discussion.

Based on the proposed residential units, the total open space requirement for the Project is 63,600 square feet. LAMC Section 12.21-G requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or

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<sup>30</sup> Email communication from LADOT (Wes Pringle) to Department of City Planning (Polonia Majas), February 11, 2020. See Appendix G of this Draft EIR.

greater may count as common open space, but cannot qualify for more than 25 percent of the total required usable open space. For the Project, 25 percent of the total required usable indoor open space equates to approximately 15,900 square feet. In addition, the LAMC allows no more than 50 square feet of private open space per dwelling unit to be counted toward the total required usable open space.

The Project would provide 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, and 8,596 square feet of outdoor/covered space. The Applicant would request a ZAI pursuant to LAMC Section 12.21-A,2 to count and credit the 8,596 square feet of covered exterior open space towards the common open space requirements per LAMC Section 12.21-G,3. In addition, the ZAI would be requested to clarify that the covered open space areas provided within the building cut-outs of the Project would not be considered “floor area” as defined by the LAMC. The Project would also provide private balconies for 562 of the 580 proposed dwelling units, which would comprise a total of 28,100 square feet of private open space. The balconies would project four feet into the public right-of-way and begin projecting at a height of 25 feet above the sidewalk. Although the balconies would typically be required to project at an elevation of 40 feet above grade due to provisions in the DDG, the Project is requesting relief from this requirement through a Specific Plan Project Permit Adjustment and will plant trees in the public right-of-way that will conform to the Urban Forestry Division’s standards. The balconies projecting at 25 feet above grade would therefore not inhibit any tree growth or maturity. Therefore, with approval of the requested ZAI, the Project would provide a total of 65,193 square feet of proposed open space, which would exceed the 63,600 square feet of open space required for the Project.

As discussed above, the Project would provide indoor and outdoor common open space in a tiered terrace arrangement, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. As such, the Project would conform with the open space objectives outlined in LAMC Section 12.21-G, which include affording occupants of multiple residential dwelling units opportunities for outdoor living and recreation; providing safer play areas for children as an alternative to the surrounding streets, parking areas, and alleys; improving the aesthetic quality of multiple residential dwelling units by providing relief to the massing of buildings through the use of landscape materials and reduced lot coverage; and providing a more desirable living environment for occupants of multiple residential dwelling units by increasing natural light and ventilation, improving pedestrian circulation and providing access to on-site recreation facilities.

With regard to landscaping, pursuant to LAMC Section 12.21-G, a minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, and trees. Therefore, the Project would be required to provide a minimum of approximately 8,875 square feet of planted common open space. The Project would provide approximately 8,896 square feet of planted common area, which would exceed the requirement. Therefore, the Project would be consistent with this provision of the LAMC.

LAMC Section 12.21-G requires the planting of one 24-inch box tree per every four new dwelling units. Based on the 580 dwelling units proposed by the Project, 145 trees would be required. In addition, the Project's construction would require the removal of seven existing street trees, which would be subject to the Board of Public Works approval. Removed street trees would be replaced at a 2:1 ratio in accordance with the policies of the Bureau of Street Services, Urban Forestry Division. As such, 14 street trees would be required to be planted in the right-of-way to replace the street trees. However, due to the physical constraints of the right-of-way and Project Site, the Project would be able to accommodate the planting of 10 of the 14 street tree replacements in the public right-of-way and 79 of the 145 trees on-site, within the Project. Per Ordinance No. 185573 (effective July 5, 2018), a Director's Decision under LAMC Section 12.21-G,3 may determine that a site cannot feasibly accommodate a required tree and allow an in-lieu fee to be used to satisfy a Development Tree Planting Requirement. The Project would provide 10 trees along the street and 79 trees on-site. Pursuant to LAMC Section 62.177, the Applicant would request to pay a Development Tree Planting Requirement In-Lieu Fee for a total of 70 trees (66 on-site and 4 off-site in the public right-of-way) otherwise required to be planted pursuant to LAMC Section 12.21-G,2.(a)(3) and the Board of Public Works replacement policy. With approval of this request, the Project would be consistent with LAMC open space and tree planting requirements.

As discussed in Section IV.G, Transportation, of this Draft EIR, residential automobile parking for the proposed uses would be provided in accordance with LAMC Section 12.21-A,4(p), which requires one parking space for each dwelling unit of three or fewer habitable rooms and 1.25 parking spaces for each dwelling unit of more than three habitable rooms. This would require the Project to provide 634 residential parking spaces. However, by providing bicycle parking in accordance with the Bicycle Parking Ordinance per LAMC Section 12.21-A,4, the Project would only be required to provide 602 vehicle parking spaces for residential units. As such, the Project would comply with the LAMC by providing a total of 640 parking spaces, which would include 602 parking spaces for the on-site residential units, 34 covenanted parking spaces<sup>31</sup> and four surplus parking spaces.

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<sup>31</sup> Required vehicle parking spaces within the Project Site for the 611 West 6th Street building pursuant to covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248).

In accordance with LAMC Section 12.21-A,16 and the Bicycle Parking Ordinance, the Project would also provide 251 bicycle parking stalls.

Pursuant to LAMC Section 12.27, the Project would request three Zone Variances. The Project would request to provide reduced drive aisle widths of 24 feet in lieu of the otherwise required 27-foot 4-inch drive aisle for a 8-foot 6-inch wide standard stall and 25-foot 4-inch drive aisle otherwise required for a 7-foot 6-inch wide compact stall as outlined in LAMC Section 12.21-A,5(a). The Project would also request to provide 60 percent of the required residential primary parking spaces as compact spaces, in lieu of the required minimum of one primary standard space for each residential unit otherwise required by LAMC Section 12.21-A,5(c), and to permit the parking of compact spaces in a tandem configuration. Lastly, the Project would also request a Zone Variance to allow relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction, such as a fence, wall, column, post or similar obstruction, otherwise required by LAMC Section 12.21-A,5(a)(1)(ii). Therefore, with the requested Zone Variances, the Project would comply with the applicable LAMC parking requirements.

With regard to the proposed parking garage, pursuant to LAMC Section 12.21-A,2, the Applicant requests a ZAI to clarify that private parking garages can implement the use of a 24-hour parking attendant service, through recordation of a covenant and agreement, in order to attend to and serve residential parking provided in a tandem configuration within the private parking garage.

In summary, with approval of the requested discretionary actions, the Project would be consistent with all applicable provisions of the LAMC adopted for the purpose of avoiding or mitigating an environmental effect.

*(iii) Citywide Design Guidelines*

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

The Project would introduce commercial/retail/restaurant uses and a residential lobby at the ground level with lighting for building entries and walkways to provide for pedestrian orientation and allow clear identification of secure routes. The Project would

also design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways with pedestrian safety features to reduce areas of concealment such that visibility would be maximized between vehicles and pedestrians. In addition, the Project would also widen the sidewalks along 8th Street and add street trees to provide an enhanced and accessible pedestrian experience. As such, these Project elements would provide additional pedestrian amenities for the community and provide a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.

The Project would prioritize pedestrian access by providing multiple pedestrian access points for patrons of the commercial/retail/restaurant uses on 8th Street and Hope Street. Residents on foot would access the residential lobby of the building from 8th Street.

Vehicle access to the Project Site would be provided via two driveways—one Hope Street and one along Grand Avenue. The driveways along Hope Street and Grand Avenue would be located at the northern-most points of the Project Site. As such, the Project would orient parking and driveways as far from corners as possible, as recommended by Guideline 2. Visitors, taxis, and rideshare vehicles would be able to access the Project Site via Hope Street or Grand Avenue to arrive at an internal porte cochère without entering the subterranean or above grade garage. After accessing the porte cochère, visitors, taxis, and rideshare vehicles would exit the site on Grand Avenue. Service vehicles would enter the Project Site via the Hope Street access point, which would have clear signage, and exit the Project Site via the Grand Avenue driveway. The Project's loading, receiving, and trash staging would all be located within the building and would not interfere with on-site pedestrian and vehicular circulation, which would support a best practice outlined in Guideline 2. Thus, consistent with a best practice of Guidelines 2, the Project's drop off/pick-up areas would not be located along adjoining sidewalks.

Overall, the Project would carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project would activate the ground floor along primary street frontages by introducing commercial/retail/restaurant uses to a site that is currently occupied solely by parking uses. To activate the street and sidewalk, these new uses would feature extensive windows at the ground level, and continuous balconies would be situated 25 feet above grade. As such, the Project would introduce a human-scale element and visual interest to pedestrians, visitors, and occupants. Consistent with Guideline 3, the Project would avoid long blank walls and would ensure that ground floor uses maintain a high degree of

transparency and maximize a visual connection to the street. As previously discussed, the Project would include new street trees and bicycle parking. As such, the Project would employ community-serving assets within the sidewalk area.

The Project would also support Guideline 3 and the building design recommendation for high-rise buildings to utilize podiums and rooftop areas as common areas. Specifically, the Project would provide indoor and outdoor common open space in a tiered terrace arrangement, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. In addition, the Project would also be consistent with Guideline 3 in that the outdoor spaces and private residential balconies provide views onto sidewalks.

Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

Guideline 8: Protect the site's natural resources and features.

The Project Site is located in an urbanized area and is currently developed with a low-rise parking structure and a surface parking lot that is entirely paved and devoid of landscaping. As discussed above, seven existing street trees adjacent to the Project Site would be removed, and a row of street trees would be planted along 8th Street, Hope Street, and Grand Avenue. Due to physical constraints, the Project would be able to accommodate the planting of 10 of the 14 street tree replacements required in the public right-of-way. These trees would be selected in coordination with the Urban Forestry Division of the City of Los Angeles Department of Public Works. In addition, the Project would include 79 trees on-site and would request to pay a Development Tree Planting Requirement In-Lieu Fee for a total of 70 trees (66 on-site and 4 off-site in the public right-of-way) otherwise required to be planted pursuant to LAMC Section 12.21-G,2.(a)(3) and the Board of Public Works replacement policy. Therefore, the Project would contribute to the City's natural resources that improve air quality. As such, the Project would support Guideline 8.

Guideline 9: Configure the site layout, building massing, and orientation to lower energy demand and increase the comfort and well-being of users.

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would incorporate energy-efficient design methods and technologies, Energy Star-labeled products and appliances and energy-efficient lighting technologies and fenestration



designed for solar orientation. Refer to Project Design Feature AIR-PDF-2 in Section IV.A, Air Quality, of this Draft EIR; Project Design Feature GHG-PDF-1 in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR; and Project Design Feature WAT-PDF-1 in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. The proposed use of continuous balconies along portions of the building would also provide passive shading for indoor spaces, reducing energy consumption and allowing for increased natural daylighting and natural ventilation via fully-operable balcony doors and windows. Therefore, the Project configure the building to lower energy demand and increase the comfort and well-being of users.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

Consistent with recommendations under Guideline 10, the Project would plant a row of street trees along 8th Street, Hope Street, and Grand Avenue that would be selected in coordination with the City's Urban Forestry Division. In addition, as discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project would manage stormwater through on-site infiltration and drywells. As such, the Project would support Guideline 10 by introducing green infrastructure and incorporating stormwater best management practices.

Based on the discussion above, the Project would not conflict with the Citywide Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

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

The DDG provides common design objectives that maintain neighborhood form and character while promoting design excellence, creative infill development solutions, and sustainable development practices and innovations. The DDG focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The DDG's standards and guidelines identified as those adopted for the purpose of avoiding or mitigating an environmental effect include the following topics: Livable and Sustainable Design, Sidewalks and Setbacks; Ground Floor Treatment, Parking and Access, Massing and Street Wall, On-Site Open Space and Landscaping, and Streetscape Improvements. Refer to Table 6 of Appendix D of this Draft EIR for further detail.

The Project would promote a more livable and sustainable Downtown by providing a cohesive design and relationship between the neighborhood, street, and proposed development. The Project location would provide residents and visitors with accessible transportation choices, including the 7th Street/Metro Center Station, a hub of the regional

rail network, and numerous bus lines running in the vicinity. The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a TPA and SCAG-designated HQTAs. In addition, the Project would provide improved sidewalks with street trees, a widened sidewalk along 8th Street, and ground level commercial/retail/restaurant uses to improve pedestrian travel and public use around the Project Site. The proposed building would incorporate a tiered terrace arrangement throughout the vertical levels of the building to provide open space elements. Furthermore, the Project would comply with the City Green Building Code and LEED certified or equivalent building standards to implement energy conservation, water conservation, and waste reduction features. As such, the Project would not conflict with the DDG standards and guidelines related to livable and sustainable design.

The Project's sidewalk improvements would allow for the placement of street trees to serve as a barrier between the roadway and the zone of pedestrian movement. The Project would also include pedestrian-scale lighting fixtures in accordance with Bureau of Street Lighting and DDG standards. As such, the Project would improve upon the existing conditions to provide a safe and comfortable pedestrian environment. The street trees would also be selected with approval from the Urban Forestry Division and would be able to grow and mature without being obstructed by the proposed balconies. Pursuant to LAMC Section 12.22-A,30(e), the Applicant would request a Specific Plan Project Permit Adjustment to deviate from the provisions of the DDG to allow for balcony projections over the sidewalk to begin at a lower elevation of 25 feet above the sidewalk in lieu of a minimum vertical height of 40 feet above the sidewalk, as recommended by the DDG to accommodate the planting of street trees. Thus, with approval of the request, the Project would not conflict with the DDG standards and guidelines related to sidewalks.

The DDG encourages variations in setbacks along street frontages and dictates that retail streets in the Financial Core include setbacks of 0 to 3 feet. The portions of Hope Street and Grand Avenue adjacent to the Project Site are identified as retail streets in the Financial Core and would meet the setback guidelines. Therefore, the Project would be consistent with the intent of the DDG standards and guidelines related to setbacks.

Per Figure 3-1 of the Downtown Design Guide, at least 75 percent of a development's ground floor street frontage along retail streets, excluding access to parking, must be designed to accommodate retail, professional office, live-work uses. The property consists of a corner narrow site with limited frontages on Hope Street and Grand Avenue, which are retail streets, make strict compliance with percentages and length-of-storefront conditions impractical to comply with once a limited amount of wall surface is set aside for necessary elements for the operation of the building, such as exit stairs, ventilation louvers and equipment necessary to operate the building. As such, pursuant to LAMC Section 12.22-A,30(e), the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide to provide less than 75 percent

active uses along the retail streets of Hope Street and Grand Avenue. Therefore, with approval of this Specific Plan Project Permit Adjustment, the Project would not conflict with the DDG standards and guidelines related to street frontages along Hope Street and Grand Avenue.

In addition, pursuant to Section 4.C of the DDG, along other (non-retail) streets, at least 75% of the ground floor street frontage shall be designed to accommodate either active uses or residential units with individual entries along the street. Furthermore, similar to active uses provided on retail streets, any active use provided on non-retail streets is required to meet a minimum depth of 25 feet. The proposed uses along 8th Street, a non-retail street, would not meet the DDG requirement to provide a minimum of 75 percent active uses along non-retail streets. As such, pursuant to LAMC Section 12.22-A,30(e), the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide to provide less than 75 percent active uses along the non-retail street of 8th Street. Therefore, with approval of this Specific Plan Project Permit Adjustment, the Project would not conflict with the DDG standards and guidelines related to street frontages along 8th Street.

Furthermore, the Project would locate parking, loading, and vehicular circulation to promote sidewalk/street wall continuity and reduce conflicts with pedestrians. The Project would allow service, delivery, and trash collection vehicles to enter the Project Site via Hope Street and exit via Grand Avenue. Visitor, taxi, and rideshare vehicles would have assigned passenger pick-ups and drop-offs within the ground level porte cochère on-site. Given the narrow site conditions, more than three aboveground parking levels are necessary to adequately serve the Project. The parking podium would be screened and integrated into the design of the building façade. As detailed in Section IV.G, Transportation, of this Draft EIR, the Project would comply with requirements in Section 321, Driveway Design, of LADOT's Manual of Policies and Procedures along Hope Street and Grand Avenue to provide an adequate number of driveways with adequate widths. The Project would reduce the number of existing curb cuts on the Project Site from four to two. The Project's driveways on Hope Street and Grand Avenue are located near driveways on adjacent garage properties immediately to the north and as far from intersections as possible to maintain continuity of the sidewalk to the greatest extent possible around the site. In addition, the Project's longest street frontage, on 8th Street, would run the full block without being interrupted by a driveway. Furthermore, the Project would encourage alternate modes of transportation by providing parking in accordance with the City's Bicycle Parking Ordinance. Therefore, the Project would not conflict with the DDG standards and guidelines related to parking and access and would also comply with the City's Above Grade Parking Advisory.

As discussed above, the proposed building would be comprised of landscaping and four above-ground tiers with varying stepbacks from Hope Street. Through the stepped tower massing, the urban street wall would be articulated by the mass of the first tier of the

building. The proposed commercial/retail/restaurant uses on the ground level would be designed with window treatments, architectural design features, and building articulations to enhance the pedestrian realm. The Project would provide an attractive sidewalk design that would promote pedestrian activity in the surrounding area. Thus, the Project would not conflict with DDG standards and guidelines related to massing and street walls.

The Project would also provide a variety of on-site open space in accordance with the DDG. The Project would provide trees and landscaping as well as approximately 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, 8,596 square feet of outdoor covered open space, and 28,100 square feet of private balcony space. The Project would also provide pedestrian-scale windows on the ground floor to encourage visitor activity. As such, the Project would incorporate amenities and landscaping that serve residents, encourage outdoor activities, and provide pedestrian comfort along streets.

The Project would not conflict with standards and guidelines related to tree species, planting, and spacing. On the ground level, the Project would remove the seven existing street trees adjacent to the Project Site to accommodate construction, and would replace the removed trees by planting a row of street trees along 8th Street, Grand Avenue, and Hope Street. The replacement street trees would be selected with approval from and in accordance with the City's Urban Forestry Division and would be able to grow and mature without being obstructed by the proposed balconies, which would be situated at 25 feet above grade. As discussed above, pursuant to LAMC Section 12.22-A,30.C(e), the Applicant would request a Specific Plan Project Permit\_Adjustment to deviate from the provisions of the DDG to allow for balcony projections over the required sidewalk easement to begin at a lower elevation of 25 feet above grade instead of the 40 feet above grade otherwise required. As such, the Project's street tree spacing, planting, and irrigation would comply with the DDG.

Based on the above and as presented in Table 6 in Appendix D of this Draft EIR, the Project would not conflict with the applicable standards and guidelines of the DDG adopted for the purpose of avoiding or mitigating an environmental effect.

*(c) Conclusion*

**Based on the analysis provided above, the Project would not conflict with the applicable goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with relevant environmental policies in applicable plans. As such, Project impacts with respect to Threshold (b) would be less than significant.**

## (2) Mitigation Measures

Project-level impacts with regard to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts with regard to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

# e. Cumulative Impacts

## (1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 74 related projects in the vicinity of the Project Site. The related projects generally consist of infill development including mixed use, retail, restaurant, residential, and office uses. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies, and would be subject to CEQA review. Therefore, the Project and the related projects would not have significant cumulative land use impacts. In addition, as discussed above, as the Project would not conflict with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts with regard to land use would be less than significant. Thus, no mitigation measures would be required.

## (3) Level of Significance After Mitigation

Cumulative impacts related to land use were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.