

## **Appendix F**

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### Land Use Plan Consistency Analysis Tables

# Appendix F

## Land Use Tables

**Table 1**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
<b>Land Use Chapter</b>	
<p><b>Goal 3A:</b> A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</p>	<p><b>No Conflict.</b> The Project Site is located within the boundaries of the former Community Redevelopment Agency's (CRA) Bunker Hill Urban Renewal Project (also known as the Bunker Hill Redevelopment Project). Due to lack of funding, the Project Site was never redeveloped by the CRA and has since remained vacant aside from the Los Angeles County Metropolitan Transportation Authority (Metro) B and D Lines Pershing Square Station portal located on the southeast corner of the Project Site. The Project would revitalize an area considered to be economically depressed with a new development containing a mixture of uses located in close proximity to public transportation. Overall, the Project would provide a diversity of uses that would create a livable city that supports the needs of existing and future residents, businesses, and visitors, and would not conflict with this goal. In addition, the Project would be a mixed-use project (including affordable housing) developed within a City-designated transit priority area (TPA) and SCAG-designated high quality transit area (HQTA), and thus would contribute to a balanced distribution of land uses, conservation of natural resources, reduction of traffic congestion, assurance of environmental justice, and a healthful living environment.</p>
<p><b>Objective 3.1:</b> Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</p>	<p><b>No Conflict.</b> As discussed in Section II, Project Description, of this Draft EIR, the Project involves a new mixed-use development that would include an integrated combination of residential, hotel (e.g., hotel rooms, restaurants, ballrooms, meeting rooms, and amenities), retail, restaurant and open space (including both common publicly accessible and private open space) uses. The Project would result in a diversity of uses that would support the needs of the City's existing and future residents, businesses, and visitors, and would not conflict with this objective.</p>
<p><b>Policy 3.1.3:</b> Identify areas for establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities include a citywide linear network</p>	<p><b>No Conflict.</b> The Project would provide common open space in the form of plazas, gardens, courtyards, and landscaped terraces that would be publicly accessible during daytime hours. The common open space proposed</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
of parklands and trails, neighborhood parks, and public open spaces.	within the Project Site would include 56,881 square feet of exterior and interior common areas, which would exceed the open space requirements of the LAMC. The primary open space amenity would be a flexible open space area referred to as Angels Terrace, which would be located at the center of the Project Site. This approximately 16,847-square-foot terrace courtyard would provide shade and seating to host a wide range of cultural events and performances. <sup>a</sup> Additional common open space areas would include Hill Street Plaza and Upper California Plaza Extension. The Project's open space areas would serve the needs of existing and future residents of the Central City area. Thus, the Project would not conflict with this policy.
<b>Policy 3.1.7:</b> Allow for development in accordance with the policies, standards, and programs of specific plans in areas in which they have been adopted. In accordance with Policy 3.1.6, consider amending these plans when new transit routes and stations are confirmed and funding is secured.	<b>No Conflict.</b> The Project is located within the Bunker Hill Specific Plan area. The Project would be largely consistent with, and would help implement, the Specific Plan. For example, the proposed floor area would yield an FAR of approximately 13:1 in compliance with the Specific Plan's maximum permitted FAR for the Project Site, and the Project would comply with the Specific Plan's setback, street wall, and Pedestrian Plan requirements. While the Project would meet most of the Specific Plan criteria, a Director's Determination for Alternative Design is sought to provide relief from the strict application of the Specific Plan requirements related to Retail Street frontage uses. Additionally, the Project would develop and revitalize an underutilized site with a new high-density mixed-use development adjacent to the Metro B and D Lines Pershing Square Station portal, as called for in the Specific Plan and in numerous other City land use plans. Hence, the Project would not conflict with this policy. See Table 5 below, for further discussion.
<b>Objective 3.2:</b> Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.  <b>Policy 3.2.3:</b> Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	<b>No Conflict.</b> The proposed mix of residential, hotel, retail, restaurant, and open space uses within one site would facilitate a reduction of vehicle trips and vehicle miles traveled (VMT), as well as a reduction in air pollution as the shopping and dining needs of on-site residents, hotel guests, and employees may be met within the Project Site, thereby reducing the need for off-site trips.  Additionally, the Project Site is located within a TPA, HQTA and thus is well-served by public transportation. The Project would be directly accessible by the on-site Metro B and D Lines Pershing Square Station portal. There is also a bus stop along Hill Street, across from the Project Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, and 94 and the Los Angeles Department of Transportation (LADOT)'s Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>2/302, 4, 10/48, and 794. In addition, Angels Flight, a historic funicular railway, provides a connection between Hill Street and Olive Street.</p> <p>The Project would also improve the existing sidewalks fronting the Project Site, provide 375 bicycle parking spaces for residents and visitors, and would represent the intensification of urban density in close proximity to existing bike routes and transit, all of which would promote use of alternative modes of transportation. Therefore, the Project would provide for the development of land use patterns that emphasize pedestrian/bicycle access and use.</p> <p>Based on the above, the Project would not conflict with this objective and corresponding policy.</p>
<p><b>Objective 3.4:</b> Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p><b>No Conflict.</b> The Project would provide new multi-family residential and commercial retail uses in a Regional/ Downtown Center along primary transit corridors/ boulevards, while at the same time conserving existing neighborhoods and related districts by developing and focusing residential, retail and hotel uses within a vacant Downtown infill site adjacent to transit that does not displace or otherwise impinge on existing low-density residential uses in the area.</p>
<p><b>Objective 3.7:</b> Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.</p>	<p><b>No Conflict.</b> The Project would introduce new multi-family residential housing opportunities integrated with hotel, retail, restaurant and open space uses within a site that is currently underutilized. In addition, the non-residential uses would provide new employment, lodging and commercial opportunities for the surrounding community. By providing a mixed-use project with a variety of supporting uses within an urban infill site already served by utility infrastructure, services and transit, the Project would promote the stability and enhancement of multi-family residential development in the Downtown Center and would represent growth in an area with sufficient public infrastructure and services such that resident quality of life in the area would be maintained and improved. Overall, the Project would not conflict with this objective.</p>
<p><b>Policy 3.7.1:</b> Accommodate the development of multi-family residential units in areas designated in the community plans.</p>	<p><b>No Conflict.</b> The Project Site is designated as Regional Center Commercial and zoned C2-4D (Commercial Zone, Height District 4 with Development Limitation). The development of sites and structures that integrate housing with commercial uses in concert with supporting services, recreational uses, open spaces, and amenities is encouraged in Regional Centers. The C2 zone permits residential uses as well as a wide array of commercial uses, such as retail stores, offices, hotels, schools, parks, and theaters. The Project would introduce new multi-family residential units, along with hotel, retail, restaurant</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	and open space uses, on a site designated and zoned for such uses, and within an area primarily developed with such uses. Therefore, the Project would not conflict with this policy.
<p><b>Policy 3.7.4:</b> Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter.</p>	<p><b>No Conflict.</b> The Project would introduce high quality multi-family dwelling units based on the standards in the Urban Form and Neighborhood Design Chapter, as discussed later in this table. Specifically, the Project would redevelop an underutilized site containing the Metro B and D Lines Pershing Square Station portal with two new structures (Tower A and Tower B) consisting of residential, hotel, retail, restaurant and open space uses above a subterranean parking garage. Additionally, the Project would incorporate numerous common and private open space and recreational amenities within the Project Site, including common open space accessible to the public during daytime hours, in the form of gardens, courtyards, and terraces. The primary open space amenity would be Angels Terrace, which would include a flexible open space area located at the center of the Project Site and would provide shade and seating to host a wide range of cultural events and performances. By replacing the existing vacant areas with a new mixed-use development and open space areas, the Project would provide a high-quality development and improve the quality of the public realm (one of the primary goals of the Urban Form and Neighborhood Design chapter). Thus, the Project would not conflict with this policy.</p>
<p><b>Goal 3E:</b> Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.</p> <p><b>Objective 3.9:</b> Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places to in which to live, work, visit, both in daytime and nighttime.</p> <p><b>Objective 3.10:</b> Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.</p>	<p><b>No Conflict.</b> The Project is a new mixed-use development on an urban infill site in a highly urbanized and active area within the City (for example, immediately adjacent to the Metro B and D Lines Pershing Square Station portal, One California Plaza (including California Plaza),<sup>c</sup> and Angels Flight). The Project's proposed uses would include housing, hotel, retail, restaurant and open space uses that would be generally accessible to the public during day time hours. The Project would be designed to be pedestrian friendly; pedestrian access would be enhanced along the perimeter and throughout the Project Site, including improvements to the existing sidewalks fronting the Project Site, and new pedestrian walkways from 4th Street, Olive Street, and Hill Street would be provided. Since the Project Site is within a TPA and HQTAs, the Project would be well served by public transit. The Project's proposed hotel and commercial uses would result in an estimated 535 permanent full-time and part-time employment positions on the Project Site. The Project's broad range of uses, accessibility, and design would reinforce the existing Downtown Center, make it a desirable place to live, work, and visit, while enhancing urban lifestyles. The</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>mixed-use development offers convenient shopping and dining options for on-site residents, hotel guests, and employees all within the Project Site. Cultural, entertainment, and culinary destinations are easily accessible to visitors, including the nearby Broad Museum, Walt Disney Concert Hall, Museum of Contemporary Art, Dorothy Chandler Pavilion, and Grand Central Market. Thus, the Project would not conflict with this goal and its corresponding objectives.</p>
<p><b>Policy 3.9.8:</b> Support the development of public and private recreation and small parks by incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.</p>	<p><b>No Conflict.</b> The Project would provide common open space that would be generally publicly accessible during daytime hours in the form of landscaped plazas and terraces, including ±17,368 square foot Hill Street Plaza, ±16,847 square foot Angels Terrace, ±2,328 square foot Olive Street Plaza, ±4,156 square foot Terrace, and ±10,914 square foot Upper California Plaza Extension, for a total of approximately 51,613 square feet. The primary open space amenity would be a flexible open space area located in the center of the Project Site, known as Angels Terrace. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Private recreation amenities for residents would include fitness areas, game rooms, lounges, and meeting rooms, while the hotel amenities would include fitness/spa facilities. The Project would also improve the sidewalks fronting the Project Site to conform with the downtown street standards and applicable requirements of the Mobility Element. Thus, the Project would not conflict with this policy.</p>
<p><b>Goal 3G:</b> A Downtown Center as the primary economic, governmental, and social focal point of the region with an enhanced residential community.</p> <p><b>Objective 3.11:</b> Provide for the continuation and expansion of government, business, cultural, entertainment, visitor serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.</p>	<p><b>No Conflict.</b> Located on an underutilized urban infill site within the City's Downtown Center, the Project would provide a mix of uses within two towers, Tower A and Tower B, which would complement other Downtown towers in the surrounding area with its contemporary architecture and variation in tower height and orientation. Both towers would share part of a podium that would include a residential lobby, hotel lobbies, hotel meeting and event spaces, retail, restaurant and open space uses. At heights of 854 feet and 494 feet, the two towers are designed to have differing heights placed adjacent to each other to create a sense of a "gateway" into the Project Site and a transition between the high-rise buildings atop Bunker Hill to the west and the City's Historic Core to the east. In addition, the Project would include Angels Terrace, a flexible open space area located at the center of the Project Site that would host a wide range of cultural events and performances. The Project would enhance the Downtown Center with a mixed-use development adjacent to One California Plaza (including California Plaza),<sup>b</sup> the Metro B and D Lines Pershing Square Station portal, and</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>Angels Flight, in close proximity to businesses, and accessible public transit options. The mix of uses offers convenient shopping and dining options for on-site residents, hotel guests, and employees all within the Project Site. The Project's location offers a unique cross-section of cultural, entertainment, and culinary experiences that only Downtown can offer with iconic institutions such as, the nearby Broad Museum, Walt Disney Concert Hall, Museum of Contemporary Art, Dorothy Chandler Pavilion, and Grand Central Market. Therefore, the Project would not conflict with this goal and corresponding objective.</p>
<p><b>Policy 3.13.5:</b> Support the development of recreational and small parks in areas developed with mixed-use structures.</p>	<p><b>No Conflict.</b> As previously indicated, the Project would provide common open space in the form of gardens, courtyards, and terraces that would be generally publicly accessible during daytime hours. The primary publicly accessible open space amenity would be Angels Terrace, which would function as a flexible open space area located at the center of the Project Site. Interior common areas would include residential amenities such as fitness areas, game rooms, lounges and meeting rooms, as well as fitness/spa facilities for the hotels. Additional common and private open space areas would be provided throughout the Project Site. The common open space proposed to be provided within the Project Site would total 56,881 square feet, exceeding LAMC requirements and providing open space for both Project residents/tenants/guests and the greater Downtown area. In accordance with LAMC requirements, the Project would be subject to the payment of fees for the purpose of developing park and recreational facilities for new residents. Therefore, the Project would not conflict with this policy</p>
<p><b>Policy 3.13.6:</b> Design multi-family residential units to minimize the impacts of traffic and noise and incorporate recreational and open space amenities to support the needs of the residents.</p>	<p><b>No Conflict.</b> By providing a mixed-use project with a variety of supporting uses within a single urban infill site, the Project would facilitate a reduction of vehicle trips as the shopping needs of on-site residents, hotel guests, and employees may be met within the Project Site, thereby reducing the need for off-site trips. Additionally, the Project Site is well-served by public transportation and would be directly accessible by the adjacent Metro B and D Lines Pershing Square Station portal located on the southeastern corner of the Project Site. There is also a bus stop along Hill Street, across from the Project Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, and 94 and LADOT's Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines 2/302, 4, 10/48, and 794. In addition, Angels Flight, a historic funicular railway, provides a connection between Hill Street and Olive Street. The Project would provide 375 bicycle parking spaces for residents and visitors to promote the use of alternative</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>modes of transportation. Lastly, as discussed in detail in Policy 3.1.3 and Policy 3.13.5, above, the Project would incorporate recreational and open space amenities to support the needs of the on-site residents and the surrounding community. The above would minimize traffic and traffic noise and support the needs of residents of both the Project and the greater Downtown Center area. Thus, the Project would not conflict with this policy.</p>
<p><b>Objective 3.15:</b> Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic-quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.</p> <p><b>Policy 3.15.2:</b> Work with developers and the Metropolitan Transportation Authority to incorporate public- and neighborhood-serving uses and services in structures located in proximity to transit stations, as appropriate.</p>	<p><b>No Conflict.</b> The proposed mixed-use development would be located within a 2.24-acre urban infill lot currently consisting of vacant land and the Metro B and D Lines Pershing Square Station portal. The Project would improve the physical space and visitor experience at the station portal with a café and enhanced publicly accessible arrival plaza with landscaping, trees, and seating. The Project's proposed hotel and commercial uses would generate an estimated 535 permanent full-time and part-time jobs on the Project Site, which is conveniently accessible by the Metro B and D Lines and 48 Metro, DASH, CE, Foothill Transit, Santa Monica Big Blue Bus, Torrance Transit, and Montebello Bus lines (e.g., Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, LADOT Commuter Express 419, etc. (for the full listing, see Table 2 in the Transportation Assessment included as Appendix J of this Draft EIR). Furthermore, the Project would be developed within the Downtown Center, in an area of mixed-use mid- and high-rise structures (e.g., One California Plaza, 350 Grand, Two California Plaza, etc.), rather than within a low-density residential neighborhood, and thus would not represent the encroachment of incompatible land uses into a low-density neighborhood. Thus, the Project would not conflict with this objective and corresponding policy.</p>
<p><b>Policy 3.15.6:</b> Establish standards for the inclusion of bicycle and vehicular parking at and in the vicinity of transit stations; differentiating these to reflect the intended uses and character of the area in which they are located (e.g., stations in some urban areas and "kiss-and-ride" facilities may have limited parking, while those in suburban locations may contain extensive parking).</p>	<p><b>No Conflict.</b> The Project Site currently includes the Metro B and D Lines Pershing Square Station portal, which would be integrated with the Project. In addition, as previously discussed the Project would include a complementary set of mixed-uses that would reduce vehicle trips and vehicle miles traveled; improvements to the existing sidewalks fronting the Project Site; pedestrian connections to the adjacent California Plaza Lower and Upper Levels, Angels Flight, and Metro B and D Lines Pershing Square Station portal; 375 on-site bicycle parking spaces meeting LAMC requirements; and 750 on-site vehicle parking spaces exceeding parking requirements. Thus, the Project would not conflict with this policy.</p>
<p><b>Goal 3L:</b> Districts that promote pedestrian activity and provide a quality experience for the City's residents.</p> <p><b>Objective 3.16:</b> Accommodate land uses,</p>	<p><b>No Conflict.</b> The key elements of the Project include the re-landscaping of the arrival plaza at the Metro B and D Lines Pershing Square Station portal, enhancing the experience of the Angels Flight funicular by restoring its</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	historic relationship with neighboring buildings and their occupants, creating an active pedestrian environment along the street frontages, and providing functional pedestrian connections to and from California Plaza and its adjacent office buildings and streets. Additionally, the Project would enhance pedestrian access along the perimeter and throughout the Project Site with the improvement of the existing sidewalks fronting the Project Site and new pedestrian walkways from 4th Street, Olive Street, and Hill Street. The Project also includes a pedestrian paseo (North Paseo), that would extend from the corner of 4th Street and Olive Street to the proposed new staircase adjacent to Angels Flight. The Project would also limit curb cuts along Hill Street to maintain existing pedestrian movement to/from the Metro B and D Lines Pershing Square Station portal. Thus, the Project would not conflict with this goal and its corresponding objective.
<b>Policy 3.16.2:</b> Locate parking in pedestrian districts to the rear, above or below the street-fronting uses.	<b>No Conflict.</b> Parking within the Project Site would be provided within a three-level subterranean parking. Thus, the Project would not conflict with this policy.
<b>Objective 3.17:</b> Maintain significant historic and architectural districts while allowing for the development of economically viable uses.	<b>No Conflict.</b> The Project Site is located in close proximity to the historic Broadway Theater and Commercial District to the east. However, the Broadway Theater and Commercial District (District) is physically separated from the Project Site by Hill Street and a half-block of intervening development (i.e., existing structures fronting the far side of Hill Street), with the bulk of the District located on the half block on either side of Broadway. The Project would not directly nor indirectly affect the District, as discussed further in Section IV.B, Cultural Resources, of the Draft EIR. While the Project would introduce a new visual element to the area, it would not affect the setting of the District, nor would it obscure any of the important views of the buildings within the District. Therefore, the Project would not conflict with this objective.
<p><b>Goal 3N:</b> Mixed-use, multi-family residential and commercial areas that enhance the quality of life for the City's existing and future residents and businesses.</p> <p><b>Objective 3.18:</b> Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.</p>	<b>No Conflict.</b> The Project would promote the stability and enhancement of the surrounding mixed-use (e.g., multi-family residential, commercial, etc.) neighborhood by introducing new multi-family residential housing opportunities integrated with hotel, retail, restaurant and open space uses within a currently underutilized urban infill site. Both the residential and hotel uses would include amenities (e.g., health clubs, spas, etc.) for residents and hotel guests. By providing a mixed-use project with a variety of supporting uses within one site, the Project offers convenient shopping and dining options for hotel guests, tenants, and employees, reducing the need to own or have access to a vehicle. The Project's location within the City's Downtown Center and close proximity to neighborhood

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	serving uses, such as retail, restaurants, and grocery stores, as well as arts and entertainment destinations as described above, offers hotel guests, tenants, and employees convenient access to said amenities by foot or public transit. Additionally, public infrastructure and services are sufficient in the area to serve the Project. Lastly, the Project would enhance the local area by replacing a vacant underutilized site with modern mixed-use development constructed to modern building standards, with landscaped terraces and high-quality architecture. Therefore, the Project would not conflict with this goal or its corresponding objective.
<b>Housing Chapter</b>	
<p><b>Goal 4A:</b> An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.</p> <p><b>Objective 4.1:</b> Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.</p>	<p><b>No Conflict.</b> The Project would include a wide-range of new housing opportunities, including for-sale condominiums and apartment units (comprised of a mix of market rate and affordable units, with affordable housing comprising 5 percent of the total units). The Project would include 180 condominium units consisting of one-, two-, and three-bedroom units, and 252 apartment units consisting of studio, one-, two-, and three-bedroom units. Thus, the Project would not conflict with this goal and its corresponding objective.</p>
<p><b>Objective 4.2:</b> Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.</p>	<p><b>No Conflict.</b> The Project would develop 180 condominium units and 252 apartment units within a 2.24-acre lot which currently includes the Metro B and D Lines Pershing Square Station portal. In addition, the Project Site is served by multiple bus routes. Furthermore, the Project would be located on a site surrounded on all sides by mid- and high-rise mixed-use development; no lower-density residential neighborhoods are located adjacent to or within the immediate vicinity of the Project Site. Thus, the Project would not conflict with this objective.</p>
<b>Urban Form and Neighborhood Design Chapter</b>	
<p><b>Objective 5.2:</b> Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.</p>	<p><b>Not Conflict.</b> The Project would further the City's objective to encourage development in centers along transit that already function as centers for the surrounding neighborhood, community and region by developing a high-density mixed-use project on an urban infill site in the Downtown Core immediately adjacent to the existing Metro B and D Lines Pershing Square Station portal.</p>
<p><b>Objective 5.5:</b> Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.</p>	<p><b>No Conflict.</b> The Project Site is currently vacant and underutilized, with the exception of the Metro B and D Lines Pershing Square Station portal. The Project would redevelop the Project Site with residential, hotel, retail, restaurant and open space uses. The proposed uses would be distributed throughout a series of terraced levels</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>and in two towers that would be constructed above a subterranean parking structure. The Project would also re-landscape the arrival plaza at Metro B and D Lines Pershing Square Station portal, enhance the experience of the Angels Flight funicular by restoring its historic relationship with neighborhood buildings and their occupants, create an active pedestrian environment along the street frontages by siting retail/restaurant uses at the ground floor on Hill Street and utilizing clear glass with articulated mullions along the street frontages to enhance visibility and transparency between the Project's ground floor uses and the pedestrian realm, and provide functional pedestrian connections to and from California Plaza and its adjacent office buildings and streets. The Project also would improve the physical space and visitor experience at the Metro B and D Lines Pershing Square Station portal with a café. Various common and private open space areas and recreational amenities would also be incorporated. The Project would provide common open space that would be generally available to the public during daytime hours in the form of plazas, gardens, courtyards, and landscaped terraces, the square footage of which would exceed LAMC requirements. The primary open space amenity Angels Terrace, would be located at the center of the Project Site. Trees and other landscaping elements would also be provided along the streets surrounding the Project Site. Lastly, the Project would be developed with high-quality architecture consistent with City design standards and guidelines. Thus, this Project would not conflict with this objective.</p>
<p><b>Objective 5.8:</b> Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.</p>	<p><b>No Conflict.</b> The Project would establish strong pedestrian orientation within the City Center by: (1) siting retail/restaurant/commercial uses at the ground floor fronting Hill Street; (2) beautifying the arrival plaza of the Metro B and D Lines Pershing Square Station portal with a new café and landscaping; (3) using clear glass with articulated mullions along the street frontages to increase transparency to the pedestrian realm; and (4) providing convenient and scenic pedestrian access across the Project Site's terraced podium to Upper or Lower California Plaza and Olive Street. The functional pedestrian connections include a new landscaped staircase along the Angels Flight funicular connecting Hill Street to Lower and Upper California Plaza, as well as the North Paseo that would extend from the corner of 4th Street and Olive Street to the proposed new staircase adjacent to Angels Flight. The North Paseo would be lined with retail/restaurant/commercial uses and thus serve on-site tenants, hotel guests, and employees, as well as draw other visitors and office workers who traverse the Project Site as they</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>commute on foot to neighboring office buildings and other destinations. The Project would provide common open space that would be generally available to the public during daytime hours in the form of plazas, gardens, courtyards, and landscaped terraces. In addition, the Project would include proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the parking areas and points of entry into the buildings; sufficient lighting of parking areas to maximize visibility and reduce areas of concealment; and entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways designed to be open and in view of surrounding sites. Such accommodations would activate the open space and pedestrian connections described above, and support a safe 24-hour downtown environment. Thus, this Project would not conflict with this objective.</p>
<p><b>Objective 5.9:</b> Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.</p>	<p><b>No Conflict.</b> The Project would be designed to provide a highly active and open ground level where visibility is maximized. In addition, the Project would incorporate elements that promote individual and community safety. Specifically, as provided in Section IV.1.2, Public Services—Police Protection, of this Draft EIR, the Project would provide for the installation of a 24-hour security camera network throughout the Project Site; controlled access to all building elevators, hotel rooms, residences, and resident-only common areas; staff training on security policies for the Project's buildings; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the parking areas and points of entry into the buildings; sufficient lighting of parking areas to maximize visibility and reduce areas of concealment; and entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways designed to be open and in view of surrounding sites. By implementing these design strategies, the Project would help increase personal safety at all times of day. The Project would not conflict with this objective.</p>
<p><b><i>Open Space and Conservation Chapter</i></b></p>	
<p><b>Policy 6.3.3.</b> Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.</p>	<p><b>No Conflict.</b> The Project would provide a total of 56,881 square feet of open space, in excess of LAMC requirements. The primary open space amenity would be a flexible open space area referred to as Angels Terrace, located at the center of the Project Site. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Angels Terrace would be accessible to the general public during daytime Angels Terrace would be lined with retail/restaurant/commercial</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?																																							
	<p>storefronts facing the plaza which promotes pedestrian activation within the plaza and supports greater visibility and transparency between the storefronts and public plaza. The Angels Terrace would be accessed through the North Paseo which would extend from the corner of 4th Street and Olive Street to the proposed new staircase adjacent to Angels Flight. In addition, the Angels Terrace would be accessible by escalators from the ground level open space. The ground level open space would be comprised of the Metro arrival plaza with a new café and Hill Street Plaza which offers new landscaping, trees, and seating areas, and leads to the retail/restaurant storefronts facing Hill Street and the new landscaped staircase that connects Hill Street to Lower and Upper California Plaza. These open space areas are visible from 4th and Hill Streets. All open spaces areas would be subject to 24-hour security surveillance as described in Section IV.1.2, Public Services—Police Protection, of this Draft EIR. Furthermore, the Project design utilizes clear glass with articulated mullion along the buildings' ground floor frontages to promote eyes on the street and support a 24-hour downtown environment. By implementing these design strategies, the Project would help increase personal safety within the open space areas. Thus, the Project would not conflict with this policy.</p>																																							
<p><b>Policy 6.4.7:</b> Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.</p>	<p><b>No Conflict.</b> The Project would support this City policy by providing a variety of open space areas within the Project Site that would be accessible to the public, including several plazas (the Hill Street Plaza and Angels Terrace), gardens, courtyards, and landscaped terraces as listed below.</p> <table border="1" data-bbox="753 1325 1443 1860"> <thead> <tr> <th colspan="3" data-bbox="753 1325 1443 1371">Angels Landing—Proposed Outdoor Open Space</th> </tr> <tr> <th data-bbox="753 1371 1187 1440">Open Space</th> <th data-bbox="1187 1371 1317 1440">Size (sf<sup>2</sup>)</th> <th data-bbox="1317 1371 1443 1440">Publicly Accessible</th> </tr> </thead> <tbody> <tr> <td data-bbox="753 1440 1187 1476">Level PB1—Hill Street Plaza</td> <td data-bbox="1187 1440 1317 1476">11,350</td> <td data-bbox="1317 1440 1443 1476">Yes</td> </tr> <tr> <td data-bbox="753 1476 1187 1512">Level 1—Hill Street Plaza</td> <td data-bbox="1187 1476 1317 1512">6,036</td> <td data-bbox="1317 1476 1443 1512">Yes</td> </tr> <tr> <td data-bbox="753 1512 1187 1547">Level 3—Angels Terrace</td> <td data-bbox="1187 1512 1317 1547">16,847</td> <td data-bbox="1317 1512 1443 1547">Yes</td> </tr> <tr> <td data-bbox="753 1547 1187 1583">    Restaurant Terrace 1</td> <td data-bbox="1187 1547 1317 1583">775</td> <td data-bbox="1317 1547 1443 1583">Yes</td> </tr> <tr> <td data-bbox="753 1583 1187 1619">    Restaurant Terrace 2</td> <td data-bbox="1187 1583 1317 1619">2,263</td> <td data-bbox="1317 1583 1443 1619">Yes</td> </tr> <tr> <td data-bbox="753 1619 1187 1654">Level 4—Olive Street Plaza</td> <td data-bbox="1187 1619 1317 1654">2,328</td> <td data-bbox="1317 1619 1443 1654">Yes</td> </tr> <tr> <td data-bbox="753 1654 1187 1690">Level 5—Terrace</td> <td data-bbox="1187 1654 1317 1690">4,156</td> <td data-bbox="1317 1654 1443 1690">Yes</td> </tr> <tr> <td data-bbox="753 1690 1187 1726">    Tower B Hotel Pool Deck</td> <td data-bbox="1187 1690 1317 1726">2,855</td> <td data-bbox="1317 1690 1443 1726">Yes</td> </tr> <tr> <td data-bbox="753 1726 1187 1761">Level 6—Lower California Plaza Terrace</td> <td data-bbox="1187 1726 1317 1761">4,520</td> <td data-bbox="1317 1726 1443 1761">Yes</td> </tr> <tr> <td data-bbox="753 1761 1187 1797">    Tower B Hotel Outdoor Fitness Area</td> <td data-bbox="1187 1761 1317 1797">1,210</td> <td data-bbox="1317 1761 1443 1797">No</td> </tr> <tr> <td data-bbox="753 1797 1187 1833">Level 7—Upper California Plaza Extension</td> <td data-bbox="1187 1797 1317 1833">10,914</td> <td data-bbox="1317 1797 1443 1833">Yes</td> </tr> </tbody> </table>	Angels Landing—Proposed Outdoor Open Space			Open Space	Size (sf <sup>2</sup> )	Publicly Accessible	Level PB1—Hill Street Plaza	11,350	Yes	Level 1—Hill Street Plaza	6,036	Yes	Level 3—Angels Terrace	16,847	Yes	Restaurant Terrace 1	775	Yes	Restaurant Terrace 2	2,263	Yes	Level 4—Olive Street Plaza	2,328	Yes	Level 5—Terrace	4,156	Yes	Tower B Hotel Pool Deck	2,855	Yes	Level 6—Lower California Plaza Terrace	4,520	Yes	Tower B Hotel Outdoor Fitness Area	1,210	No	Level 7—Upper California Plaza Extension	10,914	Yes
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**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?		
	Level A20—Tower A Hotel Terrace	4,925	Yes
	Level A41—Tower A Residential Terrace	4,720	No
	Level B42—Tower B Residential (Roof Deck) Terrace	5,268	No
	<b>Total</b>	<b>78,167<sup>b</sup></b>	<b>—</b>
	<p><i>sf = square feet</i></p> <p><sup>a</sup> <i>Based on maximum 15 square feet per person, per the Building Code.</i></p> <p><sup>b</sup> <i>The discrepancies in the totals between this table (78,167 sf) and Table II-1 in Section II, Project Description, of this Draft EIR (56,881 sf) has to do with how the LAMC defines "common open space" (the higher number is all outdoor open space, the lower number is only the common open space open to the sky).</i></p> <p><i>Source: Handel Architects, October 2020; AES, October 2020, Eyestone December 2020.</i></p>		
<p><b>Policy 6.4.8:</b> Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.</p> <p>a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space,</p>	<p><b>No Conflict.</b> The Project Site does not currently provide any public open space that is accessible to the surrounding community. The Project would replace the vacant land within the Project Site with an integrated mixed-use development that would provide a variety of publicly accessible open space areas, including landscaped walkways that would provide connectivity throughout the Project Site and adjacent uses, in excess of LAMC open space requirements. The Project would also offer direct pedestrian connections to the Lower and Upper California Plaza to maximize the use of existing open space at California Plaza, and create a seamless connection at the Upper California Plaza level with a large landscaped</p>		

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
<p>especially in targeted growth areas.</p> <p>b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.</p>	<p>terrace on the Project Site called the Upper California Plaza Extension. See also the consistency analysis for Policy 6.4.7 above. As such, the Project, a private development, would enhance the open space resources of the neighborhood and would not conflict with this policy.</p>
<p><b>Policy 6.4.9:</b> Encourage the incorporation of small-scaled public open spaces within transit-oriented development, both as plazas and small parks associated with transit stations, and as areas of public access in private joint development at transit station locations.</p>	<p><b>No Conflict.</b> The Project would improve the physical space and visitor experience at the Metro B and D Lines Pershing Square Station portal with a new café. These uses would be integrated with the proposed Hill Street Plaza located at the 4th and Hill Streets corner of the Project Site, which would include landscaping, shade trees, and seating areas. From the Metro B and D Lines Pershing Square Station portal and Hill Street Plaza, there would be steps and terraces up approximately one story to the primary open space feature at the center of the Project Site called the Angels Terrace. The Angels Terrace would also be accessible through the North Paseo which would extend from the corner of 4th Street and Olive Street to the proposed new staircase adjacent to Angels Flight. The Hill Street Plaza also leads to the new landscaped staircase adjacent the Angels Flight funicular that connects Hill Street to Lower and Upper California Plaza with terraced steps and landscaped plazas. As such, the Project would not conflict with this policy.</p>
<p><b>Policy 6.4.10:</b> Provide for the joint use of open space with existing and future facilities, where feasible.</p>	<p><b>No Conflict.</b> The Project would include residential, hotel, retail, restaurant, and open space uses (including several open space terraces open to the public during daylight hours). In particular, Angels Terrace, a pedestrian-oriented landscaped open space area designed and located in the center of the Project Site between the two proposed towers, would be the primary publicly accessible open space on the Project Site. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances, with pedestrian access to the terrace provided from the on-site commercial uses, the surrounding streets, California Plaza, Angeles Flight, and the Metro B and D Lines Pershing Square Station portal.</p> <p>The Project would also offer direct functional pedestrian connections to the Lower and Upper California Plaza and provide a large landscaped terrace that seamlessly connects to the Upper California Plaza. The proposed Upper California Plaza Extension would maximize the joint use of existing open space at California Plaza and proposed open space throughout the Project Site. In addition, the proposed Terrace and Olive Street Plaza</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
	<p>would similarly provide functional pedestrian connections along the northern boundary of the Project Site to Lower California Plaza and Olive Street, respectively. The Terrace connection also promotes the joint use of Lower California Plaza open space and the proposed open space throughout the Project.</p> <p>Thus, the Project would not conflict with this policy.</p>
<p><b>Policy 6.4.11:</b> Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.</p>	<p><b>No Conflict.</b> The Project would provide on-site pedestrian connections between the proposed on-site open space plazas and Angels Flight, California Plaza, and the Metro B and D Lines Pershing Square Station portal. As discussed in the analysis above under Policy 6.4.9 and 6.4.10, the Project's open space plazas and terraces are publicly accessible during daylight hours. The Hill Street Plaza is located at the on-site Metro portal to enhance the arrival experience. The Upper California Plaza Extension and Terrace are connected to the abutting California Plaza to maximize the joint use of publicly accessible open space next door and proposed throughout the Project Site. Therefore, the Project would not conflict with this policy.</p>
<p><b>Economic Development Chapter</b></p>	
<p><b>Objective 7.2.1:</b> Identify the characteristics of any surplus City-owned land and determine the appropriateness of designating this land for public, commercial, industrial, or residential uses.</p>	<p><b>No Conflict.</b> The Project Site would become City-owned land (subsequent to the land sale from CRA/LA to the City) and has been identified as an optimal site for development of the commercial and residential uses proposed by the Project. Per the transactional documents entered into between the City and the Applicant, the City would sell the Project Site to the Applicant concurrently with the land sale from the CRA/LA to the City. To that end, the City would transfer the Project Site to the Applicant to construct the Project consistent with the purpose and policies of the Economic Development chapter. Therefore, the Project would not conflict with this objective.</p>
<p><b>Objective 7.2:</b> Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.</p> <p><b>Policy 7.2.2:</b> Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.</p> <p><b>Policy 7.2.3:</b> Encourage new commercial</p>	<p><b>No Conflict.</b> The Project would include a mix of residential, hotel, retail, restaurant and open space uses within the Downtown Center, immediately adjacent to the Metro B and D Lines Pershing Square Station portal and multiple existing bus routes. The proposed development would provide residential units, employment opportunities, and neighborhood-serving uses to support the City's objective to establish a balance of land uses to meet the needs of local residents and foster continued economic investment and growth. In addition, by providing a mix of uses on an underutilized urban infill site that has convenient access to public transit, as well as opportunities for walking and biking to neighborhood serving shops and amenities, the Project would facilitate a reduction in vehicle trips and vehicle miles traveled. This, along with the</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
<p>development in proximity to rail and bus transit corridors and stations.</p> <p><b>Objective 7.9.2:</b> Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.</p>	<p>incorporation of project design features provided in Section IV.A, Air Quality, and Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, would facilitate a reduction in air pollution to ensure maximum feasible environmental quality. Furthermore, the Project would not encroach into an existing residential neighborhood. Instead, the Project is an urban infill development that transforms an underutilized property into a mixed-use development within an existing mixed-use corridor and transit corridor in DTLA. Concentrating the proposed uses along these existing corridors and development nodes within DTLA optimizes the impact of City capital expenditures on infrastructure improvements. Therefore, the Project would not conflict with this objective and associated policies.</p>
<p><b>Objective 7.3:</b> Maintain and enhance the existing businesses in the City.</p> <p><b>Policy 7.3.2:</b> Retain existing neighborhood commercial activities within walking distance of residential areas.</p>	<p><b>No Conflict.</b> The properties surrounding the Project Site are primarily designated for Regional Commercial land uses. The Project is within close proximity to a cluster of iconic cultural arts buildings such as the Museum of Contemporary Arts, the Walt Disney Concert Hall, and the Broad Museum. The Project Site also borders California Plaza to the north and west, an active public open space that is part of an open space network between two Downtown skyscrapers. The Project is also in close proximity to several restaurants and the Grand Central Market. The Project would enhance the existing businesses in the City as it would provide new housing and hotel opportunities within walking distance, which would provide more visitors and patrons to the existing businesses nearby. Therefore, this Project would not conflict with this objective and corresponding policy.</p>
<p><b>Policy 7.2.5:</b> Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.</p> <p><b>Policy 7.6.3:</b> Facilitate the inclusion of shopping facilities in mixed-use developments that serve the needs of local residents and workers. If necessary, consider utilizing financing techniques such as land write-downs and density bonuses.</p>	<p><b>No Conflict.</b> The Project would develop a mix of residential, hotel, retail, restaurant and open space uses within one site. The Project would include retail and restaurant uses to serve the needs of the residents, hotel guests, and workers of the Project and surrounding community. Therefore, the Project would not conflict with this policy.</p>
<p><b>Objective 7.9:</b> Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a</p>	<p><b>No Conflict.</b> The Project would develop 180 for-sale condominium units and 252 apartment units (both market rate and affordable units, with affordable housing comprising 5 percent of the total units) within the City's Downtown Center in an area designated as a TPA and HQTAs and in close proximity to multiple transit</p>

**Table 1 (Continued)**  
**Applicable Goals, Objectives, and Policies of the General Plan Framework Element**

Goal/Objective/Policy	Would the Project Conflict?
reasonable portion of the City's work force to both live and work in the City.	opportunities (including the on-site Metro B and D Lines Pershing Square Station portal). The proposed unit types would include a range of studios and one- to three-bedroom units. Due to the Project's location in the Downtown Center and the proposed mix of uses, residents of the Project would have access to numerous transportation, employment, shopping and entertainment opportunities and public services. Also, the housing opportunities provided by this Project would help the City accommodate future population growth and allow for a portion of the City's work force to both live and work in the City. Thus, the Project would not conflict with this objective.
<p><b>Objective 7.10:</b> Program resources in a manner that encourages appropriate development, housing opportunities, transit service and employment generation in all areas of the City, with particular emphasis on those portions of the City which historically have not received a proportional share of such opportunities, consistent with the City's overall economic policies.</p>	<p><b>No Conflict.</b> The Project Site was originally purchased as part of the CRA Bunker Hill Redevelopment Project and was slated as the third phase of the redevelopment, which was never implemented. The Project Site has remained undeveloped since it was cleared in the late 1960s. The Project would redevelop the site as a high-density, mixed-use and transit- and pedestrian-oriented development consistent with the existing General Plan land use designation and with both the Central City Community Plan and the Bunker Hill Specific Plan. The Project would also represent infill development and the intensification of urban density within a TPA and HQTAs in close proximity to transit, and would provide new employment and commercial opportunities for the surrounding community. In addition, the Project would have a positive impact on economic development by generating an estimated 535 permanent full-time and part-time jobs and significant revenues for the City in the form of sales and transient occupancy taxes. Thus, the Project would not conflict with this objective.</p>

<sup>a</sup> Section IV.G, Noise, of this Draft EIR analyzes amplified sound system in the outdoor areas and assumes all outdoor spaces would be fully occupied and operating concurrently to Provide worst-case noise analysis.

<sup>b</sup> One California Plaza refers to the towers. California Plaza refers to the associated open space.

<sup>c</sup> One California Plaza refers to the towers. California Plaza refers to the associated open space plaza.

Source: Eyestone Environmental, December 2020.

**Table 2**  
**Applicable Goals, Objectives, and Policies of Mobility Plan 2035**

Goal/Objective/Policy	Would the Project Conflict?
<p><b>Policy 1.1:</b> Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>	<p><b>No Conflict.</b> The Project would provide vehicular access via two access points, including one at Olive Street and another at 4th Street. The Olive Street access would be the primary site access for users of the parking garage and would include a direct ramp down to the parking levels via the Upper Porte Cochère on Level 2 and the Lower Porte Cochère on Level 1. The proposed loading dock would also be accessed from Olive Street, with a turntable to allow delivery trucks to both enter and exit the loading dock head-first (e.g., no backing out of delivery trucks onto Olive Street). The 4th Street access point would provide vehicular access to the Lower Porte Cochère. In addition to entrances to hotel lobbies, the two-level porte cochère would provide access to the apartment and condominium lobbies. All parking via the porte cochère would be valet. Pedestrian access would be enhanced along the perimeter and throughout the Project Site and would be provided via new pedestrian walkways from 4th Street, Olive Street, and Hill Street. In addition, all driveways into and out of the Project would be constructed in compliance with City design standards and would be reviewed/approved by LADOT. Furthermore, the Project would not close or otherwise reduce the capacity of any existing public streets. Lastly, traffic lights and marked pedestrian crosswalks would be provided along the street fronting the Project Site, as required, to prioritize the safety of the most vulnerable roadway users. As such, the Project would not conflict with this policy.</p>
<p><b>Policy 1.6:</b> Design detour facilities to provide safe passage for all modes of travel during times of construction.</p>	<p><b>No Conflict.</b> As identified in Section IV.J, Transportation, of this Draft EIR, a Construction Management Plan would be prepared and implemented as part of the Project to minimize potential construction impacts to the surrounding area related to construction trucks, worker trips, and any possible sidewalk and lane closures. The Construction Management Plan, which would be reviewed and approved by LADOT, would include temporary traffic controls during all construction activities adjacent to public rights-of-way on public roadways to provide for safe passage for all modes of travel during construction. The Construction Management Plan would take into account the nature and timing of specific construction activities and other construction projects occurring in the vicinity of the Project Site. In addition, a work site traffic control plan identifying the location of all temporary roadway lane and/or sidewalk closures needed during Project construction would be submitted to LADOT for review and approval. Thus, the Project would provide safe passage for all modes of travel during construction and would not conflict with this policy.</p>

**Table 2 (Continued)**  
**Applicable Goals, Objectives, and Policies of Mobility Plan 2035**

Goal/Objective/Policy	Would the Project Conflict?
<p><b>Policy 2.3:</b> Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p><b>No Conflict.</b> The Project would be designed to promote walkability on-site and in the surrounding vicinity. Specifically, the Project would enhance pedestrian activity by providing pedestrian access and connections to and from the surrounding area. The Project would provide numerous dedicated entry points for pedestrians, would incorporate landscaped pedestrian walkways transecting the Project Site, and would provide improvements to the existing sidewalks fronting the Project Site. The mixture of uses would also serve to activate the street and promote walkability. Also, the Project Site’s location within a TPA, HQT, and an area well-served by transit would further promote walking as a component of trips. As such, the Project would not conflict with this policy.</p>
<p><b>Policy 2.6:</b> Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.</p>	<p><b>No Conflict.</b> In accordance with LAMC requirements, the Project would provide 375 bicycle parking spaces, including 98 short-term spaces and 265 long-term spaces. Therefore, the Project would not conflict with this policy.</p>
<p><b>Policy 2.10:</b> Facilitate the provision of adequate on and off-street loading areas.</p>	<p><b>No Conflict.</b> The Project would have a loading dock located beneath the California overbuild that would be accessed via Olive Street. The loading dock would include a turntable to allow delivery trucks to both enter and exit the loading dock head-first (e.g., no backing out of delivery trucks onto Olive Street). The loading dock would also be designed in accordance with City design standards (including the required number of loading dock bays), with design reviewed and approved by LADOT. As such, the Project would not conflict with this policy.</p>
<p><b>Policy 2.11:</b> Set high standards in designing public transit rights-of-way that considers user experience and supports active transportation infrastructure.</p>	<p><b>No Conflict.</b> The Project would improve the physical space and visitor experience at the Metro B and D Lines Pershing Square Station portal with a café and newly-designed canopy above the existing station access stairs and escalators. These uses would be integrated with the proposed Hill Street Plaza located at the corner of the Project Site, which would include landscaping and seating areas. The Project would also retain all existing bus stop facilities, include improvements to the sidewalks along the streets fronting the Project Site, and provide traffic signals and pedestrian crosswalks, as required. Therefore, the Project would not conflict with this policy.</p>
<p><b>Policy 3.1:</b> Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City’s transportation system.</p>	<p><b>No Conflict.</b> As discussed above in Policy 1.1 of Mobility Plan 2035, pedestrian access would be enhanced along the perimeter and throughout the Project Site and would include new pedestrian walkways from 4th Street, Olive Street, and Hill Street. In addition, the landscaped terraces would feature stairs, escalators, and elevators that would connect the levels and surrounding streets. A pedestrian paseo (referred to as the North Paseo)</p>

**Table 2 (Continued)**  
**Applicable Goals, Objectives, and Policies of Mobility Plan 2035**

Goal/Objective/Policy	Would the Project Conflict?
	<p>proposed at 4th Street and Olive Street would be a key pedestrian access point to the Project Site. The North Paseo would extend from the corner of 4th Street and Olive Street to Angels Terrace, as well as to a new staircase next to Angels Flight. Pedestrian access to the Project Site also would be provided via steps along Angels Flight, connecting Hill Street to Olive Street and California Plaza, the North Paseo, and the various terraced levels. As previously described, the Project is located in an area well-served by public transit and the Metro B and D Lines Pershing Square Station portal is located on the Project Site. Additionally, the Project would accommodate bicycle use by providing 375 bicycle parking spaces. The Project would not hinder vehicular access on the surrounding streets. Thus, the Project would provide opportunities for the use of all modes of travel and would not conflict with this policy.</p>
<p><b>Policy 3.3:</b> Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p><b>No Conflict.</b> The Project would promote equitable land use decisions that result in fewer vehicle trips by: (1) providing a mix of complementary uses in proximity to jobs (including those that would be offered on-site and throughout Downtown Los Angeles), destinations, and other neighborhood services; (2) providing a range of for-sale and rental housing units, including affordable housing units; and (3) providing these uses on an urban infill site within a TPA and HQTAs and in close proximity to transit. Therefore, the Project would not conflict with this policy.</p>
<p><b>Policy 3.4:</b> Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p><b>No Conflict.</b> The Project Site is in an area well-served by public transit. Specifically, transit service in the vicinity includes Metro's subway Red and Purple Lines and numerous local and regional bus lines. In particular, the Metro B and D Lines Pershing Square Station portal is located on the southeastern corner of the Project Site. There is also a bus stop along Hill Street, across from the Project Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, and 94 and LADOT's Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines 2/302, 4, 10/48, and 794. In addition, Angels Flight, an historic funicular railway, provides a connection between Hill Street and Olive Street. Furthermore, the Project would not remove any existing bus stops. Thus, residents, workers, and visitors of the Project would be well-served by affordable, efficient, convenient, and attractive transit services, which would promote transit use and a reduction in vehicle trips. Furthermore, the Project would implement traffic demand management (TDM) measures to reduce automobile trips and encourage transit use, as discussed in Section IV.J, Transportation, of this Draft EIR. Specifically, the Project</p>

**Table 2 (Continued)**  
**Applicable Goals, Objectives, and Policies of Mobility Plan 2035**

Goal/Objective/Policy	Would the Project Conflict?
	would: (1) implement and promote TDM strategies to reduce the dependency on single-occupancy vehicles by providing safe and convenient bicycle parking, improved pedestrian networks, and encourage use of transit through enhanced connectivity to existing services; and (2) in accordance with LAMC Section 12.26 J, which establishes trip reduction requirements for projects with new non-residential floor area, the Project would incorporate City-required TDM measures as part of the Project design aimed at encouraging the use of alternative transportation modes. As such, the Project would not conflict with this policy.
<b>Policy 4.8:</b> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	<b>No Conflict.</b> See discussion under Policy 3.4 above. As such, the Project would not conflict with this policy.
<b>Policy 5.2:</b> Support ways to reduce vehicle miles traveled (VMT) per capita.	<b>No Conflict.</b> The mixed-use nature of the Project would provide opportunities for people to live, work, and recreate within one site, thereby reducing VMT. The Project would represent urban infill development within a TPA and HQTA in close proximity to neighborhood services, jobs, and transit (including the on-site Metro B and D Lines Pershing Square Station portal). The Project would also promote pedestrian activity by enhancing pedestrian access throughout and around the perimeter of the Project Site. The ground floor commercial uses and streetscape improvements would further promote walkability, thus reducing VMT. The Project would also provide bicycle parking to promote use of alternative modes of transportation. Furthermore, the Project would implement TDM measures to promote non-auto travel and reduce the use of single-occupant vehicle trips (see discussion under Policy 3.4 above). Therefore, the Project would support ways to reduce VMT per capita and, as such, would not conflict with this policy.
<b>Policy 5.4:</b> Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	<b>No Conflict.</b> While this policy represents a broad based goal relative to fuel sources, technologies and infrastructure, the Project would facilitate the use of alternative-fuel, low-emitting, and fuel-efficient vehicles by: (1) increasing urban density within a TPA and HQTA, and in close proximity to transit, which would maximize the use of fuel-efficient (and possibly zero emission) transit over single-occupancy motor vehicle use; (2) including TDM measures that incentivizes/subsidizes transit use and discourage single-occupancy motor vehicle use; and (3) providing 30 percent of the proposed parking spaces as capable of supporting future electric vehicle supply equipment (EVSE), and equipping 10 percent of the proposed parking spaces with electric vehicle (EV)

**Table 2 (Continued)**  
**Applicable Goals, Objectives, and Policies of Mobility Plan 2035**

Goal/Objective/Policy	Would the Project Conflict?
	charging stations, in accordance with LAMC requirements. Therefore, the Project would not conflict with this policy.
<p><b>Policy 5.5:</b> Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.</p>	<p><b>No Conflict.</b> As discussed in the Hydrology and Water Quality section in the Initial Study, provided in Appendix A of this Draft EIR, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Furthermore, pursuant to the SWPPP that would be implemented by the Project as required under the NPDES Construction General Permit, the Project would implement BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. The Project would also comply with the SUSMP requirements during the operational life of the Project to reduce the discharge of polluted runoff from the Project Site. The Project would also be required to comply with the County's LID Standards Manual and the City's LID Ordinance, which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Furthermore, although not stated in the Initial Study, the Project would include additional street trees and landscape strips as part of the proposed sidewalk improvements within the adjacent public ROWs which would allow for some capture and infiltration of stormwater. As such, the Project would not conflict with this policy.</p>
<p>Source: <i>Eyestone Environmental, December 2020.</i></p>	

**Table 3**  
**Applicable Objectives and Policies of the General Plan Housing Element**

Policy	Would the Project Conflict?
<p><b>Objective 1.1:</b> Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.</p> <p><b>Policy 1.1.3:</b> Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.</p>	<p><b>No Conflict.</b> The Project would develop up to 180 residential for-sale condominium units and 252 residential apartment units, with 5 percent of total units comprised of affordable units. The Project would offer one-, two-, three-bedroom condominium units and studio, one-, two-, and three-bedroom apartments. Thus, the Project would incrementally advance the goal of generating a range of housing types for the region in an urbanized, infill location. In addition, no existing housing would be displaced by the Project. As such, the Project would not conflict with this objective and its corresponding policy.</p>
<p><b>Policy 2.1.1:</b> Establish development standards and policing practices that reduce the likelihood of crime.</p>	<p><b>No Conflict.</b> As discussed in Section IV.1.2, Public Services—Police Protection, of this Draft EIR, the Project would include numerous operational design features to enhance safety within, and immediately surrounding, the Project Site. This would include a security plan to ensure the safety of residents and visitors to the Project Site. The security plan would include a 24-hour security camera network throughout the Project Site, controlling access to the all buildings, having staff monitor security cameras and direct on-site staff to locations of suspicious activity, and training staff on security policies for the Project's buildings. In addition, the Project would provide lighting of buildings and walkways to provide for pedestrian safety and to clearly identify a secure route between parking areas and building entrances. The Project would also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, building entrances, spaces around buildings, and pedestrian walkways would be designed to be open and visible from surrounding sites. Thus, the Project would not conflict with this City policy to reduce the likelihood of crime.</p>
<p><b>Objective 2.2:</b> Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.</p> <p><b>Policy 2.2.1:</b> Provide incentives to encourage the integration of housing with other compatible land uses.</p>	<p><b>No Conflict.</b> The Project includes a diverse mix of residential, hotel, retail, restaurant and open space uses that would support the housing, employment, services, and recreational needs of local residents. The proposed uses would be compatible with the variety of residential and commercial uses surrounding the Project Site. The Project would provide a number of amenities, including approximately 56,881 square feet of exterior common area and additional interior common area. Common open space areas in the form of plazas, gardens, courtyards, and landscaped terraces would be publicly accessible during daytime hours. Open spaces would include gardens, fixed and movable seating, canopy trees for trees, and durable paving materials. Interior common areas would include resident amenities such as fitness areas, game rooms, lounges, and meeting rooms. As previously discussed, the Project would also be located</p>

**Table 3 (Continued)**  
**Applicable Objectives and Policies of the General Plan Housing Element**

Policy	Would the Project Conflict?
	within a TPA and HQTAs, and in close proximity to transit, including the on-site Metro B and D Lines Pershing Square Station portal. Additionally, the Project's design is based on principles of smart growth and environmental sustainability, as evidenced by its urban infill mixed-use composition, emphasis on walkability and public open space, bike-friendly environment, and proximity to public transit. Thus, the Project would promote a sustainable neighborhood that has a mix of compatible uses and services and would not conflict with this objective and corresponding policy.
<p><b>Objective 2.3:</b> Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.</p>	<p><b>No Conflict.</b> As previously noted, the Project's design is based on principles of smart growth and environmental sustainability, as evidenced by its urban infill location in a highly urbanized area that is within walking distance of a variety of uses, including a major job center; its mixed-use composition; and its proximity to public transit, including a Metro station and bus stops adjacent to the Project Site. Furthermore, as discussed in Section II, Project Description, and Section IV.C, Energy, of this Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use, Energy Star-labeled appliances, and water-efficient landscape design. In particular, the Project would be designed and constructed to achieve Leadership in Energy and Environmental Design (LEED) Silver certification. Thus, the Project would not conflict with this objective.</p>
<p><b>Policy 2.3.2:</b> Promote and facilitate reduction of water consumption in new and existing housing.</p>	<p><b>No Conflict.</b> As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would incorporate project design features to support water conservation. More specifically, the proposed uses would be equipped with high efficiency toilets, low-flow showerheads and faucets, Energy Star residential clothes washer and dishwashers, domestic water heating systems that are located in close proximity of the point(s) of use, individual metering and billing for residential and commercial water use, water-saving pool filter (or reuse of pool backwash water for irrigation), and pool/spa recirculating filtration equipment. Thus, the</p>

**Table 3 (Continued)**  
**Applicable Objectives and Policies of the General Plan Housing Element**

Policy	Would the Project Conflict?
	Project would not conflict with this policy.
<p><b>Policy 2.3.3:</b> Promote and facilitate reduction of energy consumption in new and existing housing.</p>	<p><b>No Conflict.</b> As described in Section II, Project Description, of this Draft EIR, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen, which would reduce energy usage on the Project Site. In particular, the Project would be designed and constructed to achieve LEED Silver certification. In addition, the Project would include project design features aimed at improving energy efficiency and reducing energy consumption, as outlined in Sections IV.C, Energy, and IV.E, Greenhouse Gas Emission, of this Draft EIR. As such, the Project would not conflict with this policy.</p>
<p><b>Policy 2.3.4:</b> Promote and facilitate reduction of waste in construction and building operations.</p>	<p><b>No Conflict.</b> As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, during operation, the Project would provide adequate storage areas 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. The Project would also comply with Assembly Bill 939, Assembly Bill 341, Assembly Bill 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Therefore, the Project would not conflict with this policy.</p>
<p><b>Policy 2.4.2:</b> Develop and implement design standards that promote quality residential development.</p>	<p><b>No Conflict.</b> As discussed herein, the Project would be consistent with relevant design guidelines in the General Plan Framework’s Urban Form and Neighborhood Design Chapter, the Community Plan’s Urban Design Chapter, the Downtown Design Guide, the Citywide Design Guidelines, and the Planning Department’s Walkability Checklist. Furthermore, the Project would undergo urban design review by the City. Therefore, the Project would not conflict with the intent of this policy.</p>
<p><b>Policy 2.4.3:</b> Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces.</p>	<p><b>No Conflict.</b> The Project would provide a variety of open space and recreational areas within the Project Site, including gardens, courtyards, and terraces. The primary open space amenity would be Angels Terrace, a flexible open space area located at the center of the Project Site that would provide shade and seating to host a wide range of cultural events and performances. As previously discussed additional common and private open space</p>

**Table 3 (Continued)**  
**Applicable Objectives and Policies of the General Plan Housing Element**

Policy	Would the Project Conflict?
	<p>areas would be provided throughout the Project Site. The Project would also incorporate landscaped pedestrian walkways transecting the Project Site and linking Angels Terrace to California Plaza, the Metro B and D Lines Pershing Square Station portal, Angels Flight, and the adjacent streets, and would improve the streetscapes around the Project Site. In total, the Project would provide approximately 56,881 square feet of open space in excess of LAMC, including 13,304 square feet of softscape landscaping, and would increase access to open space in the area surrounding the Project Site. Furthermore, in addition to complying with applicable energy conservation measures/requirements (e.g., Green Building Code, Title 24, etc.), per Project Design Feature GHG-PDF-1 as outlined in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would incorporate sustainability features required to achieve the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED) Silver certification or its equivalent, including the use of energy star appliances, energy-efficient lighting (including in outdoor areas), water efficient and drought-tolerant landscaping, fenestration designed for solar orientation, and the provision of bicycle parking. Lastly, per Project Design Feature WAT-PDF-1 as outlined in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would include the following applicable sustainability features: drip/subsurface and micro-spray irrigation; 100-percent drought tolerant plants; hydro-zoning and zoned irrigation; cisterns to capture stormwater runoff as it comes down through the gutter system; and both infiltration basins and pervious pavement to maximize the infiltration of rainwater and irrigation water to the groundwater basin. Therefore, the Project would not conflict with this policy.</p>
<p><i>Source: Eyestone Environmental, December 2020.</i></p>	

**Table 4**  
**Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Would the Project Conflict?
<b>Residential</b>	
<p><b>Objective 1-2:</b> To increase the range of housing choices available to Downtown employees and residents.</p>	<p><b>No Conflict.</b> The Project would develop a range of new housing opportunities in the Downtown Center, including 180 for-sale condominiums consisting of one-, two-, and three-bedroom units, as well as 252 apartment units, including affordable units, consisting of studio, one-, two-, and three-bedroom units. Thus, the Project would not conflict with this objective and corresponding policy.</p>
<p><b>Objective 1.3:</b> To foster development which can accommodate a full range of incomes.</p>	<p><b>No Conflict.</b> As discussed above, the Project would provide a range of condominium (e.g., one- through three-bedroom) and apartment (studio through three-bedroom) unit types, including 5 percent affordable for-rent units, which would accommodate individuals and families at a full range of income levels.</p>
<p><b>Policy 1-3.1:</b> Encourage a cluster neighborhood design comprised of housing and services.</p>	<p><b>No Conflict.</b> The Project would include an integrated mix of uses including residential, hotel, retail, restaurant and open space uses within two towers and a connecting podium structure. This clustered design would include pedestrian connections to California Plaza, the Metro B and D Lines Pershing Square Station portal, Angels Flight, and the proposed on-site open space network. Cultural, entertainment, and culinary destinations are easily accessible to tenants, hotel guests, and employees, including the nearby Broad Museum, Walt Disney Concert Hall, Museum of Contemporary Art, Dorothy Chandler Pavilion, and Grand Central Market. Thus, the Project would not conflict with this policy.</p>
<b>Commercial</b>	
<p><b>Objective 2-1:</b> To improve Central City's competitiveness as a location for offices, businesses, retail, and industry.</p> <p><b>Objective 2-3:</b> To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.</p> <p><b>Objective 2-4:</b> To encourage a mix of uses with an active, 24-hour downtown environment for current residents which would also foster increased tourism.</p>	<p><b>No Conflict.</b> The Project's mixed-use development would include residential, hotel (including ballrooms and meeting rooms), retail, restaurant and open space uses. These uses would improve the Central City's competitiveness as a location for offices, businesses, retail, and industry by: (1) creating an active, 24-hour environment in Downtown and the associated demand for retail, shopping, and entertainment uses; (2) providing lodging, ballrooms, meeting rooms and restaurants to attract new visitors; and (3) providing jobs for existing City residents. The Project would also provide new hotel and retail uses in Downtown in close proximity to local and regional destinations (e.g., California Plaza, Los Angeles Convention Center, the Broad Museum, Walt Disney Concert Hall, etc.). The proposed hotel uses would support tourism and conventions in the vicinity by contributing up to 515 new keys to Downtown. In addition, because the Project would offer a luxury, 5-star hospitality experience that is currently absent in the Downtown region, it would attract new international and domestic travelers who would otherwise choose to stay on</p>

**Table 4 (Continued)**  
**Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Would the Project Conflict?
	the City's westside or Beverly Hills. Thus, the Project would not conflict with these objectives.
<b>Open Space and Recreation</b>	
<p><b>Objective 4-1:</b> To encourage the expansion and additions of open spaces as opportunities arise.</p> <p><b>Policy 4-1.1:</b> Review existing open space standards to expand the range of open space resources at the neighborhood and community levels.</p>	<p><b>No Conflict.</b> The Project would incorporate common and private open space and recreational amenities totaling 56,881 square feet within the Project Site which would exceed LAMC requirements. The proposed open spaces would include common open space in the form of plazas (the Hill Street Plaza and Angels Terrace), gardens, courtyards, and landscaped terraces, which would be publicly accessible during daytime hours, with pedestrian paths connecting these open spaces to California Plaza, the Metro B and D Lines Pershing Square Station portal, Angels Flight, and the adjacent streets. Hence, the Project would provide open space for both project residents/employees, visitors and the greater community at large such that the Project would not conflict with this objective and corresponding policy.</p>
<p><b>Objective 4-2:</b> To maximize the use of the City's existing and envisioned open space network and recreation facilities by providing connections to the open space system.</p> <p><b>Policy 4-2.1:</b> To foster physical and visual links between a variety of open spaces and public spaces Downtown.</p>	<p><b>No Conflict.</b> The Project would include a pedestrian paseo (referred to as the North Paseo) which would extend from 4th Street and Olive Street to a new staircase next to Angels Flight. This new staircase would connect Hill Street to Olive Street and California Plaza, the North Paseo, and the various terraced levels, thus connecting the Project to the surrounding uses and streets. See additional information about the proposed on-site open space in the consistency analysis for Objective 4-1 and Policy 4-1.1 above. Furthermore, the close proximity of the Project to existing transit would enable Project residents, employees and guests to easily access other open space and recreational facilities within the Downtown area, and would allow off-site residents, employees and visitors to easily access the on-site open space. Thus, the Project would not conflict with this objective and corresponding policy.</p>
<b>Police Protection</b>	
<p><b>Objective 5-1:</b> To provide adequate police facilities and personnel to correspond with population and service demands in order to provide police projection.</p> <p><b>Policy 5-1.1:</b> Consult with the Police Department as part of the review of significant development projects and General Plan amendments affecting land use to determine the impact on law enforcement service demands.</p>	<p><b>No Conflict.</b> As confirmed by the LAPD in its consultation letter on the Project included in Appendix I, and as set forth in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project would have a limited impact on police services in the Central Area. The Project's proposed security features and the generation of additional tax revenues by the Project, a portion of which could be used by the City for additional police protection services and facilities would help offset the Project-related increase in demand for police services. In addition, the LAPD would review the Project as part of the plan check permitting process. Furthermore, per state law, the City is required to provide adequate police protection to its citizens. Overall, the Project would not</p>

**Table 4 (Continued)**  
**Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Would the Project Conflict?
	generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. Thus, the Project would not conflict with this objective and corresponding policy.
<p><b>Policy 5-2.1:</b> Promote the safety and security of personal property through proper design and effective use of the build environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.</p>	<p><b>No Conflict.</b> The Project would include numerous operational design features to enhance safety within, and immediately surrounding, the Project Site. This would include a security plan to ensure the safety of residents, employees, and visitors to the Project Site. The security plan could include a 24-hour security camera network throughout the Project Site, controlled access to the all buildings, and training staff on security policies for the Project's buildings. In addition, the Project would provide adequate lighting of buildings and walkways to ensure pedestrian safety and to clearly identify a secure route between parking areas and building entrances. The Project would also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, building entrances, spaces around buildings, and pedestrian walkways would be designed to be open and visible from surrounding sites. Thus, the Project would not conflict with this policy.</p>
<b>Fire Protection</b>	
<p><b>Objective 6-1:</b> To ensure that fire facilities and protective services are sufficient for the existing and future population and land uses of Central City.</p> <p><b>Policy 6-1.1:</b> Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.</p>	<p><b>No Conflict.</b> As discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, the Los Angeles Fire Department (LAFD) was consulted during the preparation of this Draft EIR (refer to the consultation letter and LAFD response included in Appendix I of this Draft EIR). Based on the analysis in Section IV.I.1, Public Services—Fire Protection, fire facilities and protective services would be sufficient to serve the Project. Compliance with applicable Building and Fire Code requirements would ensure the implementation of adequate fire prevention features to reduce the Projects demand on LAFD facilities and services and would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection of the Project, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. In addition, the Project would generate tax revenues, a portion of which the City could choose to dedicate to new fire protection services and facilities. Furthermore, per State law, the City is required to provide adequate fire protection to its citizens. As such, the Project would not conflict with this objective and corresponding policy.</p>
<b>Arts, Culture, and Architectural History</b>	
<p><b>Policy 10-1.4:</b> Ensure that the Downtown circulation system serves the existing arts and</p>	<p><b>No Conflict.</b> As previously discussed, the Project would include open space plazas and terraces open to the public</p>

**Table 4 (Continued)**  
**Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Would the Project Conflict?
<p>cultural facilities with ease of accessibility and connections.</p>	<p>during daylight hours, all of which would connect via pedestrian connections to California Plaza, the Metro B and D Lines Pershing Square Station portal, Angels Flight, and the adjacent streets. Furthermore, both California Plaza and Angels Flight represent existing arts and cultural facilities that would be directly accessible by Project residents, employees and visitors.</p> <p>The Angels Terrace would be accessed through the North Paseo which would extend from the corner of 4th Street and Olive Street to the proposed new staircase adjacent to Angels Flight. In addition, the Angels Terrace would be accessible by escalators from the ground level plaza where the Metro B and D Lines Pershing Square Station portal is located, referred to as the Hill Street Plaza.</p> <p>The new staircase adjacent to Angels Flight would connect Hill Street up to Olive Street and the Lower and Upper California Plaza with a series of landscaped terraces that seamlessly transition off-site, including the public open space areas referred to as Olive Street Plaza and Terrace.</p> <p>The Project would also offer direct functional pedestrian connections to the Upper California Plaza with a large landscaped terrace that seamlessly connects to off-site public open space at the Upper California Plaza.</p> <p>All of the aforementioned connections have also been thoughtfully planned to incorporate elevator accessibility, including elevator access to the new Angels Flight stairway terraces, and elevator access from the Hill Street Plaza up to Angels Terrace, Olive Street, and Lower and Upper California Plaza.</p> <p>As described above, the development of the Project Site would connect the Historic Core to Bunker Hill and increase accessibility to the various cultural institutions in the vicinity, including the nearby Broad Museum, Walt Disney Concert Hall, Museum of Contemporary Art, and Dorothy Chandler Pavilion.</p> <p>Thus, the Project would not conflict with this policy.</p>
<p><b>Transportation</b></p>	
<p><b>Objective 11-3:</b> To provide an internal circulation system with a focus of connecting specific pairs of activity centers to a system that provides greater geographic coverage of Downtown, thus giving Downtown travelers more choices and more flexibility.</p>	<p><b>No Conflict.</b> As described in Policy 10-1.4 above, the Project would provide an on-site pedestrian circulation system that connects the proposed uses to Angels Flight, California Plaza and the Metro B and D Lines Pershing Square Station portal. The Project would also provide pedestrian connections between Bunker Hill and the Historic Core with the removal and replacement of a new landscaped stairway along the Angels Flight funicular. As described in Policy 10-1.4 above, the Project includes elevator access from each terrace or tier of the Angels Flight stairway to</p>

**Table 4 (Continued)**  
**Applicable Objectives and Policies of the Central City Community Plan**

Objective/Policy	Would the Project Conflict?
	provide an accessible alternative to Downtown travelers who need to commute from the Historic Core up to Bunker Hill and vice versa. At the same time, the Project would not close any existing streets. Thus, the Project would not conflict with this objective.
<p><b>Objective 11-6:</b> To accommodate pedestrian open space and usage in Central City.</p>	<p><b>No Conflict.</b> The Project would enhance pedestrian access along the perimeter and throughout the Project Site, including new pedestrian walkways from 4th Street, Olive Street, and Hill Street. The Project would also include a podium with landscaped terraces that would feature stairs, escalators, and elevators that would connect the levels and surrounding streets. Additionally, the Project's North Paseo, which would extend from the corner of 4th Street and Olive Street to a new staircase next to Angels Flight, would be a key pedestrian access point to the Project Site. Overall, pedestrian access to the Project Site would be provided via steps along Angels Flight, connecting Hill Street to Olive Street and California Plaza; the North Paseo; the various terraced levels connecting the Project to the surrounding uses and streets, and to/from the Metro Pershing Square Station portal. Thus, the Project would not conflict with this objective.</p>
<hr/> <p><i>Source: Eyestone Environmental, December 2020.</i></p>	

**Table 5**  
**Applicable Purposes of the Bunker Hill Specific Plan**

Purpose/Regulations	Would the Project Conflict?
<b>Purposes</b>	
A. Implement the Central City Community Plan	<b>No Conflict.</b> The Project supports the implementation of the Central City Community Plan because it is consistent with the land uses programed for the Project Site and is generally consistent with the Specific Plan regulations as further analyzed in Section IV.F, Land Use Section, of the Draft EIR. Thus, the Project would not conflict with this purpose.
B. Create a mixed use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environment.	<b>No Conflict.</b> The Project would promote the stability and enhancement of the surrounding mixed-use (e.g., multi-family residential, commercial, etc.) neighborhood by introducing new multi-family residential housing opportunities integrated with hotel, retail, restaurant and open space uses within a currently underutilized urban infill site. Both the residential and hotel uses would include amenities (e.g., health clubs, spas, etc.) for residents and hotel guests. The Project's on-site amenities that serve residents, hotel guests, and employees alike, as well as its location within the City's Downtown Center and close proximity to neighborhood serving culinary and entertainment destinations as described above, offers a 24-hour downtown environment. Therefore, the Project would not conflict with this purpose.
D. Reinforce and enhance the district's identity as the cultural center of the region.	<b>No Conflict.</b> The mixed-use development reinforces and enhances the district's identity as the cultural center of the region by connecting the Historic Core to Bunker Hill and increasing accessibility and functional connections to the region's renowned cultural, entertainment, and culinary destinations, including the nearby Broad Museum, Walt Disney Concert Hall, Museum of Contemporary Art, Dorothy Chandler Pavilion, and Grand Central Market. Therefore, the Project would not conflict with this purpose.
E. Expand the economic base of the City by providing additional employment opportunities and additional revenues to the region.	<b>No Conflict.</b> The Project would expand the economic base of the City by generating an estimated 535 permanent full-time and part-time jobs and significant revenues for the City in the form of sales and transient occupancy taxes. Therefore, the Project would not conflict with this purpose.
F. Implement design regulations that maintain a high quality built form and encourage compatible infill development that enlivens the streets and public spaces.	<b>No Conflict.</b> The proposed mixed-use development would be located within a 2.24-acre urban infill lot currently consisting of vacant land and the Metro B and D Lines Pershing Square Station portal. The Project would improve the physical space and visitor experience at the station portal with a café and enhanced publicly accessible arrival plaza with landscaping, trees, and

**Table 5 (Continued)**  
**Applicable Purposes of the Bunker Hill Specific Plan**

Purpose/Regulations	Would the Project Conflict?
	<p>seating. In addition, the Hill Street Plaza and ground floor retail use with clear glass storefronts on Hill Street would enliven the street and pedestrian realm with enhanced landscaping, seating areas, and commercial amenities. The Project would be developed within the Downtown Center, in an area of mixed-use mid- and high-rise structures (e.g., One California Plaza, 350 Grand, Two California Plaza, etc.), rather than within a low-density residential neighborhood, and thus would not represent the encroachment of incompatible land uses into a low-density neighborhood. Thus, the Project would not conflict with this purpose.</p>
<p>G. Expand, integrate, and activate a linked network of public open spaces and pedestrian pathways.</p>	<p><b>No Conflict.</b> The Project would expand, integrate, and activate a linked network of public open spaces and pedestrian pathways by creating a terraced podium that connects the Historic Core to Bunker Hill with a series of landscaped stairways, plazas, terraces, paseos, and the like.</p> <p>The Project would provide a total of 56,881 square feet of open space, in excess of LAMC requirements. The primary open space amenity would be a flexible open space area referred to as Angels Terrace, located at the center of the Project Site. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Angels Terrace would be accessible to the general public during daytime hours. Angels Terrace would be lined with retail/restaurant/commercial storefronts facing the plaza which promotes pedestrian activation within the plaza and supports greater visibility and transparency between the storefronts and public plaza. The Angels Terrace would be accessed through the North Paseo which would extend from the corner of 4th Street and Olive Street to the proposed new staircase adjacent to Angels Flight. In addition, the Angels Terrace would be accessible by escalators from the ground level open space. The ground level open space would be comprised of the Metro arrival plaza with a new café and Hill Street Plaza which offers new landscaping, trees, and seating areas, and leads to the retail/restaurant storefronts facing Hill Street. The functional pedestrian connections also include a new landscaped staircase along the Angels Flight funicular connecting Hill Street to Olive Street, and Lower and Upper California Plaza. Therefore, the Project would not conflict with this purpose.</p>
<p>H. Support the expansion of the regional transit network through an urban form and mix of land</p>	<p><b>No Conflict.</b> The mixed-use Project is located within the City's Downtown Center in an area designated as a TPA and HQTA and in close proximity to multiple transit</p>

**Table 5 (Continued)**  
**Applicable Purposes of the Bunker Hill Specific Plan**

Purpose/Regulations	Would the Project Conflict?
uses that support high levels of transit use.	opportunities, including the on-site Metro B and D Lines Pershing Square Station portal. Thus, Project tenants, hotel guests, employees, and other visitors to the Project Site would have immediate access to multiple transit options. Therefore, the Project would not conflict with this purpose.
I. Create a transit-friendly environment by requiring conformance to pedestrian-oriented design guidelines that promote consistent street walls and active ground floor uses.	<p><b>No Conflict.</b> The Project incorporates pedestrian-oriented design features such as clear glass with articulated mullions along the street frontages along Hill Street and 4th Street to enhance visibility and transparency between the Project's ground floor uses and the pedestrian realm. In addition, the Project offers retail storefronts along Hill Street, which activates the pedestrian pathway along Hill Street, drawing foot traffic away from the Metro portal arrival plaza north towards the Angels Flight funicular. Further, the Project opens up to the corner of 4th Street and Olive Street, drawing pedestrians through the Project Site along the North Paseo which connects to the new landscaped stairway along Angels Flight. The North Paseo also opens up to the Project's primary open space amenity, Angels Terrace, which is lined with retail and restaurant storefronts that activate the pedestrian pathways within the Project Site.</p> <p>The also Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro B and D Lines Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall under the Specific Plan. Thus, the Project would not conflict with this purpose.</p>
J. Ensure that private development implements special street standards developed for the area.	<p><b>No Conflict.</b> The streets fronting the Project Site—Olive Street, 4th Street, and Hill Street—are designated Modified Avenue II under the Mobility Plan 2035. Olive Street requires a 96-foot right-of-way width and 66-foot roadway width, while 4th Street requires an 81-foot right-of-way width and 51-foot roadway width, and Hill Street requires a 93-foot right-of-way and 66-foot roadway width. The Project would include an approximately three-foot dedication along Olive Street to meet the Mobility Plan standards. All other street frontages are already fully dedicated. The Project would improve the sidewalks surrounding the Project Site as part of the proposed redevelopment activities. The sidewalks and public rights-of-way would comply with the applicable street standards of the Mobility Plan 2035. Thus, the Project would not conflict with this</p>

**Table 5 (Continued)**  
**Applicable Purposes of the Bunker Hill Specific Plan**

Purpose/Regulations	Would the Project Conflict?
	purpose.
<p>K. Support the improvement of the business environment by providing an attractive public realm.</p>	<p><b>No Conflict.</b> The Project includes several attractively landscaped open space areas accessible to the public during daylight hours, which offers enhanced passive outdoor amenity space, as well as functional pedestrian connections to travel from the bottom of Bunker Hill to the upper levels at Olive Street and Lower and Upper California Plaza. The open space areas include: (1) Upper California Plaza Extension which seamlessly connect to the adjacent California Plaza open space; (2) Angels Terrace, the primary open space amenity at the center of the Project; (3) Hill Street Plaza, the ground level plaza that includes the Metro portal arrival plaza and new café; (4) Olive Street Plaza connecting Angels Flight stairway to Olive Street; and (5) Terrace connecting Angels Flight stairway to Olive Street Plaza and Upper California Plaza Extension. The Project's network of public open space and pathways support the improvement of the DTLA business environment. Therefore, the Project would not conflict with this purpose.</p>
<p>L. Promote increased flexibility in the regulation of the height and bulk of buildings as well as the design of sites and public streets in order to ensure a well-planned mix of commercial and residential uses with adequate public space.</p>	<p><b>No Conflict.</b> The Project is substantially consistent with the Specific Plan regulations, and thus supports a mix of commercial and residential uses with adequate public open space as envisioned by the Specific Plan. The Project also maximizes the density and floor area ratio contemplated by the Specific Plan for the Project Site and utilizes public open space to activate the pedestrian realm and provide functional connections within and across the Project Site to neighboring properties and public streets.</p>
<p>Source: <i>Eyestone Environmental, December 2020.</i></p>	

**Table 6**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
<b>Goals for a Livable and Sustainable Downtown</b>	
<b>A. Neighborhood Design</b>	
<p><b>Employment Opportunities.</b> Maintain and enhance the concentration of jobs, in both the public and private sectors, that provides the foundation of sustainable Downtown.</p>	<p><b>No Conflict.</b> The Project's proposed hotel and commercial uses would generate an estimated 535 permanent full-time and part-time jobs on the Project Site. Though the jobs would largely constitute private service industry jobs, they would nonetheless contribute to the concentration of private sector jobs that sustain the Downtown market. Therefore, the Project would not conflict with this guideline.</p>
<p><b>Housing Choices.</b> Provide a wide range of housing types and price levels, including home ownership options, which bring people of diverse ages, ethnicities, household sizes and income levels into daily interaction.</p>	<p><b>No Conflict.</b> The Project would develop a range of new housing opportunities in Downtown, including 180 for-sale condominiums consisting of one-, two-, and three-bedroom units, as well as 252 apartment units consisting of studio, one-, two-, and three-bedroom units (with affordable housing comprising 5 percent of the total units). Therefore, the Project would not conflict with this guideline.</p>
<p><b>Transportation Choices.</b> Enable people to move around easily on foot, by bicycle, transit, and automobile. Accommodate cars when necessary and allow people to live easily without one.</p>	<p><b>No Conflict.</b> The Project would be developed in the Downtown Center within an area well-served by public transit. Specifically, the Metro B and D Lines Pershing Square Station portal is located on the southeastern corner of the Project Site. There is also a bus stop along Hill Street, across from the Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, and 94 and LADOT's Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines 2/302, 4, 10/48, and 794. In addition, the mix of on-site uses and nearby neighborhood-serving businesses encourage Project tenants, hotel guests, and employees to either enjoy the amenities on-site and/or take an easy walk or bicycle ride to restaurants and shops in the Project's vicinity. Many of the shops and services such as restaurants, banks, dry cleaners, drug stores, grocery stores, and the like are within convenient walking or biking distance from the Project Site. Therefore, the Project would not conflict with this guideline.</p>
<p><b>Shops and Services Within Walking Distance.</b> Provide shops and services for everyday needs, including groceries, day care, cafes and restaurants, banks and drug stores, within an easy walk from home.</p>	<p><b>No Conflict.</b> The Project would include approximately 72,091 square feet of commercial retail/restaurant space, which would serve both onsite tenants, hotel guests, and employees, as well as individuals who work and live in the neighborhood. Functional connections between Upper and Lower California Plaza offer convenient pedestrian access to the Project Site amenities from the top of Bunker Hill. As described above, the Project includes an accessible network of public open space and pathways that make it easy for pedestrians to travel within and across the Project Site. Therefore, the Project would not conflict with this</p>

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
	guideline.
<p><b>Gathering Places.</b> Provide places for people to socialize, including parks, sidewalks, courtyards and plazas, which are combined with shops and services. Program places for events and gatherings.</p>	<p><b>No Conflict.</b> The Project would provide common open space combined with shops and services in the form of plazas, gardens, courtyards, and landscaped terraces, which generally would be publicly accessible during daytime hours. The primary open space amenity would be a flexible open space area referred to as Angels Terrace that would be located at the center of the Project Site and would provide storefronts, shade, and seating to host a range of cultural events and performances. Direct connections would be provided throughout the Project Site to each new open space, as well as to the improved and widened Angels Flight stairs via an overlook landing (e.g., the area of Angels Terrace that would be adjacent to Angels Flight and allow pedestrians to view the railway). Additionally, direct connections would be made to California Plaza on the northwestern end of the Project Site. Therefore, the Project would not conflict with this guideline.</p>
<p><b>Transit-Oriented.</b> Since all of Downtown is within walking distance of transit, design all projects as transit oriented developments (TODs) that encourage residents, tenants and visitors to use transit.</p>	<p><b>No Conflict.</b> The Project's design would integrate the existing Metro B and D Lines Pershing Square Station portal and the adjacent historic Angels Flight Funicular. With regard to the Metro Pershing Square Station portal, the Project includes the demolition of the existing station canopy and the above grade walls of the station portal to allow for the construction of a new structure adjacent to the station, which is proposed to include a café as part of the proposed Hill Street Plaza. The proposed structure would include a roof extending over the existing station escalators and stairs as well as glass skylights to allow light down into the station. In addition, as requested by Metro, the replacement canopy would be designed to protect the escalators from weather. In addition, the Project would implement and promote transportation demand management (TDM) strategies to reduce the dependency on single-occupancy vehicles by providing safe and convenient bicycle parking, improved pedestrian networks, and encourage use of transit through enhanced connectivity to existing services. Lastly, in accordance with LAMC Section 12.26 J, which establishes trip reduction requirements for projects with new non-residential floor area, the Project would incorporate City-required TDM measures as part of the Project design aimed at encouraging the use of alternative transportation modes. Therefore, the Project would not conflict with this guideline.</p>
<p><b><i>B. Design Principles for Building Design</i></b></p>	
<p><b>Pedestrian-Oriented.</b> Support walkability through sensitive design of the site, building and</p>	<p><b>No Conflict.</b> As a Project Site that is located within the Downtown Center and designated for Regional Center</p>

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
streetscape. Recognize individual projects are the “building blocks” of great streets and neighborhoods. This requires particular attention to the way the building meets the sidewalk, providing a transition to pedestrian scale and elements that activate the street.	Commercial uses, the Project would result in an improved and aesthetically appealing streetscape that would promote pedestrian activity by enhancing the experience of the Angels Flight funicular and providing functional pedestrian connections to and from California Plaza and its adjacent buildings and streets. Pedestrian access would be enhanced along the perimeter and throughout the Project Site, including via new pedestrian walkways from 4th Street, Olive Street, and Hill Street. The main pedestrian connection would be the North Paseo, which would extend from the corner of 4th Street and Olive Street to the new stairs adjacent to Angels Flight. Additional streetscape improvements would include landscaped frontages and street furniture. In addition, the Project would comply with the Specific Plan's setback and street wall regulations, and implement the Retail Street frontage regulations to the extent feasible to define the public realm and create a pedestrian scaled environment to promote walkability. The Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro B and D Lines Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall under the Specific Plan. On Hill Street, the Project includes a combination of building street wall, plaza, and the Metro portal, which also complies with Specific Plan requirements. The Hill Street frontage would be activated by retail storefronts on the ground floor of Tower A and a new standalone café next to the Metro portal within the Hill Street Plaza. The Project would promote the use of public transit since the Metro B and D Lines Pershing Square Station portal is located on the southeast corner of the Project Site. Therefore, the Project would not conflict with this guideline.
<b>Transit-Oriented.</b> Orient projects to provide convenient access to the nearest transit options (Metro rail or bus, DASH) wherever possible	<b>No Conflict.</b> See discussion above for Transportation Choices. As indicated, the Project would not conflict with this guideline.
<b>Multi-Modal.</b> Accommodate vehicular access and parking in a way that respects pedestrians and public spaces and contributes to the quality of the neighborhood.	<b>No Conflict.</b> Parking within the Project Site would be provided within a three-level subterranean parking garage located underneath the Project Site. Access to the parking structure would primarily be provided via two access points, one located along Olive Street and the other along 4th Street. Therefore, the Project would not conflict with this guideline.
<b>Sustainable.</b> Produce efficient and creative solutions to move toward zero-carbon buildings. Include innovative technology and building design strategies to increase renewable energy	<b>No Conflict.</b> As indicated in Sections IV.C, Energy Resources, and IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with the energy conservation requirements (including the solar-ready

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
<p>production (solar and/or wind), water conservation, reduce energy use, waste, and automobile use. Incorporate on-site landscape elements that reduce energy use and enhance livability. Consider providing a green roof or white roof design strategies to reduce solar gain (which contributes to the urban heat island effect) and to reduce the quantity of water entering the storm drain system. Comply with the City's Low-Impact Development (LID), Standard Urban Stormwater Mitigation Plan (SUSMP), and Green Building Ordinance and design buildings capable of achieving LEED Silver certification. Projects that include a hotel should participate in the California Green Lodging Program, California Seal Certification Program, or similar program.</p>	<p>requirements) of California Code of Regulations (CCR) Title 20 and 24, CALGreen, the City's Green Building Code, and other applicable laws and regulations. Also, as indicated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would comply with the water conservation requirements of Title 24, the City's Green Building Code, Low-Impact Development (LID) Ordinance, and Standard Urban Stormwater Mitigation Plan (SUSMP) Ordinance, and other applicable laws and regulations.</p> <p>In addition, per Project Design Feature GHG-PDF-1 as outlined in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would be designed and incorporate sustainability features required to achieve LEED Silver certification or its equivalent, including the use of energy star appliances, energy-efficient lighting (including in outdoor areas), water efficient and drought-tolerant landscaping, fenestration designed for solar orientation, and the provision of bicycle parking. Lastly, per Project Design Feature WAT-PDF-1 as outlined in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would include additional water conservation features, including but not limited to: low flow showerheads; drip/subsurface and micro-spray irrigation; 100 percent drought tolerant plants; hydro-zoning and zoned irrigation; cisterns to capture stormwater runoff as it comes down through the gutter system; and both infiltration basins and pervious pavement to maximize the infiltrate of rainwater and irrigation water to the groundwater basin.</p> <p>Furthermore, the Project would provide EV and EVSE in accordance with LAMC requirements, and would comply with applicable solid waste reduction and recycling requirements</p> <p>Lastly, the Project would represent a high-density mixed-use infill project within a SCAG-designated HQT and City-designated TPA adjacent to an existing Metro station, which would together maximize transit and other alternative modes of transportation, minimize VMT, and result in associated reductions in motor vehicle-related fuel use. The Project would also be designed to further reduce vehicular trips to the Project Site through various TDM strategies as set forth in Section IV.J, Transportation, and the Transportation Assessment included as Appendix J, of this Draft EIR.</p> <p>Therefore, the Project would not conflict with the building sustainability requirements of the Downtown Design Guide.</p>

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
<b>Sidewalks and Setbacks</b>	
<b>A. Sidewalks</b>	
1. Provide the sidewalk width required by the Downtown Street Standards through sidewalk easements.	<b>No Conflict.</b> The Project would improve sidewalks along the Project street frontage. The sidewalk dimensions will be designed to comply with the Downtown Street Standards, which require a 15-foot sidewalk on 4th Street, Hill Street, and Olive Street. Therefore, the Project would not conflict with this guideline.
<b>B. Setbacks</b>	
Provide setbacks appropriate to the adjacent land use and district.	<b>No Conflict.</b> The Specific Plan does not require any setbacks for the Project. As such the proposed buildings will be constructed at the property line. Therefore, the Project would not conflict with this guideline.
<b>Ground Floor Treatment</b>	
<b>A. Ground Floor Treatment Along All Streets</b>	
Orient buildings to the street to promote sidewalk activity, with building entries located on the public street. Additional public entrances are encouraged.	<b>No Conflict.</b> The proposed ground level commercial retail uses and pedestrian paseo would promote pedestrian activity and further activate the streets in the Project area. Specifically, the ground floor commercial retail uses would be oriented to the adjacent streets and would feature extensive transparent windows and entry canopies to encourage pedestrian activities and create a human-scale frontage design. Further, the building façade would be articulated along all street frontages to add visual interest and enhance the pedestrian experience. In addition, in conformance with the Mobility Plan 2035, the Project includes 3-foot-wide average sidewalk easements on Olive, 4th, and Hill Streets to improve pedestrian travel throughout the area. Therefore, the Project would not conflict with this guideline.
Incorporate a pedestrian-oriented scale at the street level.	<b>No Conflict.</b> See discussion immediately above. The Project would also comply with the Specific Plan's setback and street wall regulations, and implement the Retail Street frontage regulations to the extent feasible to define the public realm and create a pedestrian scaled environment to promote walkability. The Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro B and D Lines Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall under the Specific Plan. On Hill Street, the Project includes a combination of building street wall, plaza, and the Metro portal, which also complies with Specific Plan requirements. The Hill Street frontage would be activated by retail storefronts on the ground floor of Tower A and a new standalone café next to the Metro portal within the Hill Street Plaza. As indicated,

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
	the Project would not conflict with this guideline.
Don't waste valuable street frontage on "back of house" uses.	<b>No Conflict.</b> Trash areas associated with the proposed buildings would be located on the western portion of the Project fronting Olive Street and would be enclosed or otherwise screened from view from public rights-of-way during Project operation. Other back of house uses would be located either below ground or at the western portion of the building where the loading dock would be located (which would be visually separated by a solid roll-up door), away from the retail-oriented street frontages. Therefore, the Project would not conflict with this guideline.
<b>B. Ground Floor Treatment along Retail Streets</b>	
Ground floor spaces on designated Retail Streets shall be further enhanced for retail or other active uses, orienting tenant spaces to the street and maximizing storefronts and entries along the sidewalks to sustain street level interest and promote pedestrian traffic.	<b>No Conflict.</b> See discussion regarding Ground Floor Treatment Along All Streets, above. As indicated, the Project would not conflict with this guideline.
<b>Parking and Access</b>	
<b>A. All Parking and Access</b>	
Locate parking, loading and vehicular circulation to minimize its visibility.	<b>No Conflict.</b> Parking within the Project Site would be provided within a three-level subterranean parking garage located underneath the Project Site. Access to the parking structure would primarily be provided via two access located along Olive Street and 4th Street. The Olive Street access would be the primary site access for users of the parking garage and would include a direct ramp down to the parking levels via the upper porte cochère on Level 2 and the lower porte cochère on Level 1. The 4th Street access would provide access to the lower porte cochère. All parking via the porte cochère would be valet. Therefore, the Project would not conflict with this guideline.
Locate drop-off zones along the curb or within parking facilities to promote sidewalk/street wall continuity and reduce conflicts with pedestrians.	<b>No Conflict.</b> The Project would provide a pick-up/drop off area at the upper porte cochère on Level 2. This area would be completely enclosed and would not be directly accessible from the public plazas and terraces, thereby reducing conflicts with pedestrians. As such, the Project would not conflict with this guideline.
Encourage the use of alternate modes of transportation by providing incentives for reduced automobile use.	<b>No Conflict.</b> The Project would be located in an area well-served by public transit. Specifically, the Project Site contains the Metro B and D Lines Pershing Square Station portal located on the southeast corner of the Project Site. There is also a bus stop along Hill Street, across from the Project Site, which serves Metro Bus

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
	<p>Lines 2/302, 4, 10/48, 81, 90/91, and 94 and LADOT's Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines 2/302, 4, 10/48, and 794. In addition, the adjacent Angels Flight, a historic funicular railway, provides a connection between Hill Street and California Plaza above Olive Street. In addition, the mix of on-site uses and nearby neighborhood-serving businesses encourage Project tenants, hotel guests, and employees to either enjoy the amenities on-site and/or take an easy walk or bicycle ride to restaurants and shops in the Project's vicinity. Many of the shops and services such as restaurants, banks, dry cleaners, drug stores, grocery stores, and the like are within convenient walking or biking distance from the Project Site. Lastly, the Project would implement and promote transportation demand management (TDM) strategies to reduce the dependency on single-occupancy vehicles by providing safe and convenient bicycle parking, improved pedestrian networks, and encourage use of transit through enhanced connectivity to existing services, and in accordance with LAMC Section 12.26 J, which establishes trip reduction requirements for projects with new non-residential floor area, the Project would incorporate City-required TDM measures as part of the Project design aimed at encouraging the use of alternative transportation modes. Therefore, the Project would not conflict with this guideline.</p>
<p>Limit the number and width of curb cuts and vehicular entries to promote street wall continuity and reduce conflicts with pedestrians.</p>	<p><b>No Conflict.</b> Access to the Project is provided by two entry points, including one at Olive Street and another at 4th Street. No other curb cuts are proposed along the surrounding street frontages. Therefore, the Project would not conflict with this guideline.</p>
<p><b>Massing and Street Wall</b></p>	
<p><b>A. Massing</b></p>	
<p>Design building massing to reinforce the street wall with well-scaled elements or structures that are sensitive to the neighborhood context.</p>	<p><b>No Conflict.</b> The Specific Plan provides specific regulations with respect to the Project's street wall. The Project includes a building street wall along nearly all of Olive Street and a majority of 4th Street. Though the corner of 4th Street and Hill Street features the Metro B and D Lines Pershing Square Station portal and Hill Street Plaza, such spaces are also counted towards the Project's required street wall under the Specific Plan. On Hill Street, the Project includes a combination of building street wall, plaza, and the Metro Pershing Square Station portal, which also complies with Specific Plan requirements. Therefore, the Project would not conflict with this guideline.</p>

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
<b>B. Street Wall</b>	
On Retail Streets, design building walls along the sidewalk (Street Walls) to define the street and to provide a comfortable scale for pedestrians.	<b>No Conflict.</b> See the discussions regarding massing above and setbacks further above with respect to street wall design. As indicated, the Project would not conflict with this guideline.
<b>C. Spacing</b>	
Provide privacy and natural light and air for all residential units.	<b>No Conflict.</b> All residential units would have access to natural light and air, with substantial windows and in some cases private balconies provided on various levels. The residential units would also include operable windows which facilitates access to air. The Project would comply with the tower spacing guidelines set forth in the Downtown Design Guide which would provide privacy for residents. Therefore, the Project would not conflict with this guideline.
<b>D. Towers</b>	
Towers should have slender massing and sound proportions.	<b>No Conflict.</b> Tower A is tapered on one side to provide a distinct profile and its hexagonal shape reduces the apparent mass of the tower when viewed from a distance. Tower B is notably slender in its narrow direction as compared to other high-rises in the area. Its shape is a parallelogram which serves to reduce its apparent mass from certain angles. Therefore, the Project would not conflict with this guideline.
Tower forms should appear simple yet elegant, and add an endearing sculptural form to the skyline.	<b>No Conflict.</b> See discussions above regarding massing and towers. In addition, Tower A, which is the tall tower of the two, is the Project's signature tower. The curtainwall panels on the six sides of the tower extends up to varying heights, and when viewed at a distance would not be seen as a "standard" flat top like most of the high-rise buildings in Downtown. As indicated, the Project would not conflict with this guideline.
<b>On-Site Open Space</b>	
Provide publicly accessible open spaces at street level that provide pedestrian linkages throughout Downtown.	<b>No Conflict.</b> The Project's street level open space—the Hill Street Plaza—comprising the Metro arrival plaza with a new café, landscaping, trees, and seating areas would provide multiple pedestrian linkages within and across the Project Site to neighboring properties and streets. The network of pedestrian linkages emanating from the street level includes: (1) the new landscaped staircase adjacent the Angels Flight funicular that connects Hill Street to Lower and Upper California Plaza with terraced steps and landscaped plazas; (2) the ground floor retail uses within Tower A oriented toward Hill Street with clear glass storefronts that enliven the street and lead to the Angels Flight staircase; (3) the sidewalk improvements along 4th

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
	Street that connect to the improved Metro portal arrival area; and (4) the Hill Street Plaza escalators that lead up to the Project's primary open space area, the Angels Terrace, which has a North Paseo that connects the corner of Olive and 4th Streets to the Angels Flight staircase. Therefore, the Project would not conflict with this guideline.
Provide adequate open space to serve residents.	<b>No Conflict.</b> The Project would provide common open space and recreational amenities throughout the Project Site, including common open space areas in the form of plazas, gardens, courtyards, and landscaped terraces, which would be generally accessible to the public during daytime hours. The primary open space amenity would be a flexible open space area located in the center of the Project Site, known as Angels Terrace. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Private recreation amenities for residents and hotel guests would include fitness areas, game rooms, lounges, and meeting rooms. Therefore, the Project would not conflict with this guideline.
Incorporate amenities that facilitate outdoor activities such as standing, sitting, strolling, conversing, window-shopping and dining, including seating for comfort and landscaping for shade and aesthetics.	<b>No Conflict.</b> See discussion above regarding ground floor open space and residential open space provided as part of the Project. The Angels Terrace would facilitate outdoor dining as the open space area is lined with retail and restaurant storefronts. The Hill Street Plaza would also support outdoor dining associated with the proposed café located next to the Metro portal. As indicated, the Project would not conflict with this guideline.
Use landscape elements to provide shade and other functional and aesthetic objectives.	<b>No Conflict.</b> As previously described, the Project's open space areas would include gardens, fixed and moveable seating, canopy trees for shade, and durable paving materials. Angels Terrace would be located at the center of the Project Site and would provide shade and seating to host a wide range of cultural events and performances. Therefore, the Project would not conflict with this guideline.
<b>Architectural Detail</b>	
<b>B. Horizontal and Vertical Variation</b>	
Vary the plane of a building to provide visual interest and contribute to the quality and definition of the street wall. Apply horizontal architectural variations to break down the scale and massing of longer façades.	<b>No Conflict.</b> The Project would feature a series of exterior wall designs and each would correlate to the program of the building's interior. For example, the first wall design would occur at the base of the two towers where a horizontal balcony feature would wrap around the floor plates to create strong shadows along the exterior. The second wall design would be predominantly present in Tower A and would consist of a vertical design

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
	expression that utilizes floor to ceiling glass and protruding vertical fins that appear as layered screens in front of a horizontal substructure to expose balconies at the corners of the floor plates. The building materials planned for the Project exteriors would consist of various types of glass panels, metal balustrades and screening elements, and plaster, and at the podium level, additional materials such as stone and terra cotta. The palette and color scheme for the Project would consist of light and warm tones. Lastly, the Project would undergo City design review. Therefore, the Project would not conflict with this guideline.
<b>C. Materials</b>	
Feature long-lived and sustainable materials. The material palette should provide variety, reinforce massing and changes in the horizontal or vertical plane.	<b>No Conflict.</b> See discussions above regard horizontal and vertical variation. As indicated, the Project would not conflict with this guideline.
<b>F. Lighting</b>	
Provide well-designed architectural and landscape lighting integrated into the proposed project to create a sense of safety, encourage pedestrian activity after dark, and support Downtown's vital nightlife.	<b>No Conflict.</b> Exterior lighting within public areas would include pedestrian-scale fixtures and elements. The Project would provide adequate lighting of buildings and walkways to provide for pedestrian safety and to clearly identify a secure route between parking areas and building entrances. The Project would also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, building entrances, spaces around buildings, and pedestrian walkways would be designed to be open and visible from surrounding sites. Therefore, the Project would not conflict with this guideline.
<b>H. Minimizing Impacts on Neighbors</b>	
Architecturally incorporate or arrange roof top elements to screen equipment such as mechanical units, antennas, or satellite dishes.	<b>No Conflict.</b> Most mechanical equipment would be located in the basement level of the building. Per City requirements, mechanical, electrical, and roof top equipment, as well as building appurtenances, would be screened from public view. In particular, rooftop mechanical equipment would be screened, and the Project would prohibit the installation of satellite dishes. Therefore, the Project would not conflict with this guideline.
<b>Signage</b>	
<b>B. Signage Guidelines by Type—Signs in Context</b>	
1. Signs should be conceived as an integral part of the project design so as not to appear as an afterthought. All signs shall be integrated with the design of the project's architecture and	<b>No Conflict.</b> Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Project signage would include a central identity sign located at Hill Street

**Table 6 (Continued)**  
**Project Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**

Standards/Guidelines <sup>a</sup>	Would the Project Conflict?
landscaping.	Plaza and various wayfinding and retail signs typically associated with a mixed-use project. Other vertical building-mounted signs would be located along Olive Street and 4th Street to indicate the main residential, guest, and commercial parking entrances. Wayfinding signs would be located at parking garage entrances, elevator lobbies, and residential corridors. Project signage may also include murals on building walls intended to complement the design of the structures and enliven the pedestrian experience while respecting the urban context and surrounding uses. Therefore, the Project would not conflict with this guideline.
<p><sup>a</sup> <i>The guidelines and standards included herein focus on those applicable to the Project and most relevant to the land use analysis within this Draft EIR. Other standards may apply, conformance with which will be determined by the City in accordance with Downtown Design Guide procedures.</i></p> <p><i>Source: Eyestone Environmental, December 2020.</i></p>	

**Table 7**  
**Applicable Goals and Principles of SCAG's 2016–2040 RTP/SCS**

Goals and Principles	Would the Project Conflict?
<p><b>Goal 2:</b> Maximize mobility and accessibility for all people and goods in the region.</p> <p><b>Goal 5:</b> Maximize the productivity of our transportation system.</p> <p><b>Goal 8:</b> Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p><b>No Conflict.</b> The Project Site represents an urban infill site within a TPA and HQTAs in a highly urbanized area of the City. The Project would develop residential, hotel (including ballrooms and meeting rooms), retail, restaurant and open space uses. The Project would also include amenities (e.g., health clubs, spas, etc.) for Project residents and hotel guests. This complementary mix of land uses all within one site would offer convenient shopping, dining, and employment options for hotel guests, tenants, and employees, thereby reducing the need to travel off-site for services, employment opportunities, and recreation. The Project's location within the City's Downtown Center and close proximity to neighborhood serving uses, such as retail, restaurants, and grocery stores, as well as arts and entertainment destinations such as the Broad Museum and Walt Disney Concert Hall, also offers hotel guests, tenants, and employees convenient access to amenities by foot, bicycle, or public transit. The functional pedestrian connections described above would also improve walkability on and off-site by providing accessible linkages between Bunker Hill and the Historic Core. Furthermore, on-site bicycle parking and amenities would further promote biking as an alternative mode of transportation.</p> <p>Public transit service in the vicinity of the Project Site includes Metro's Red and Purple Lines and numerous local and regional bus lines, which provide connections to other Downtown subway stations. In particular, Metro's Pershing Square Station portal, which is located on the southeastern corner of the Project Site, provides connections to Metro's Red Line and Purple Line. There is also a bus stop along Hill Street, across from the Project Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91 and 94 and the LADOT Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street serves Metro Bus Lines 2/302, 4, 10/48 and 794.</p> <p>Therefore, the Project would maximize mobility and accessibility by providing convenient access to public transit and opportunities for walking and biking. Thus, the Project would not conflict these goals.</p>
<p><b>Goal 6:</b> Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p> <p><b>Goal 7:</b> Actively encourage and create incentives for energy efficiency, where possible.</p>	<p><b>No Conflict.</b> Refer to the consistency analysis for Goal 2 and Goal 5, above. In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste, thereby reducing associated greenhouse gas emissions and minimizing the impact on natural resources and</p>

**Table 7 (Continued)**  
**Applicable Goals and Principles of SCAG's 2016–2040 RTP/SCS**

Goals and Principles	Would the Project Conflict?
	<p>infrastructure. Specific sustainability features would include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star labeled appliances; and water-efficient landscape design. The Project also would activate the sidewalks at the Project Site by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking, and transit use. Therefore, the Project would not conflict with these goals.</p>
<p>_____</p> <p><i>Source: Eyestone Environmental, December 2020.</i></p>	