

IV. Environmental Impact Analysis

F. Land Use and Planning

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts with regard to land use, specifically potential conflicts with policies, plans, or regulations adopted for the purpose of avoiding or mitigating an environmental effect related to land use. The analysis herein is supported by a thorough regulatory consistency analysis provided in Appendix F of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Local

Several plans, policies, and regulatory documents guide development within the City of Los Angeles (City), including the City of Los Angeles General Plan (General Plan) and the Los Angeles Municipal Code (LAMC), which govern land use through specific development and design standards and building and safety codes. The Central City Community Plan (Community Plan) constitutes the currently adopted local land use policy document for the Project Site and Community Plan area. The Community Plan is the operative document for land use analysis because it is the currently adopted plan applicable to the Project Site. The Project Site is also located within the Bunker Hill Specific Plan (Specific Plan) area, which is also a key document for land use analysis. In addition, the Project Site is located within the Greater Downtown Housing Incentive Area, a City-designated Transit Priority Area (TPA), a former Los Angeles State Enterprise Zone,¹ and is subject to the Downtown Design Guide, the Citywide Design Guidelines, and the City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability

¹ *Legislative action resulted in the repeal of the Enterprise Zone Act and the dissolution of Enterprise Zones, effective December 31, 2013. However, the parking reduction provisions of the Enterprise Zone are still in effect (www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml.) Accordingly, no further discussion of the Los Angeles State Enterprise Zone is provided herein except in the context of parking requirements.*

Checklist). Applicable plans and associated regulatory documents/requirements are described below.

(a) City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a general plan, which is a comprehensive long-term document that provides principles, policies, and objectives to guide future development. The City's General Plan is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development. The General Plan sets forth goals, objectives, and programs to guide land use policies and to meet the existing and future needs of the community. The General Plan consists of a series of documents which includes the seven state-mandated elements: Land Use, Circulation (Mobility), Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, and Public Facilities and Services, as well as the City of Los Angeles General Plan Framework Element (Framework Element). The Land Use Element is composed of 35 area plans known as community plans that guide land use at the community level. The Project Site is located within the boundaries of the Central City Community Plan area.² Each of these General Plan components are discussed below.

(i) Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City's General Plan elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

(1) Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes land use categories, which are described by ranges of intensity/density, heights, and lists of typical uses. These land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. They are intended to

² *City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 332 South Olive Street, <http://zimas.lacity.org>, accessed May 18, 2020.*

serve as a guideline for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City.³ The Project Site is located within the designated Downtown Center, which is defined as follows:

...an international center for finance and trade that serves the population of the five county metropolitan region. Downtown is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities, and the Convention Center. The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high rise buildings.⁴

(2) Housing Chapter

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

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

³ Chapter 1 of the Framework Element neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and the City's Community Plans. The Framework Element expressly states that it "is not sufficiently detailed to impact requests for entitlements on individual parcels. Community Plans will be more specific and will be the major documents to be looked to for consistency with the General Plan for land use entitlements." The Executive Summary of the Framework Element similarly states that it "does not convey or affect entitlements for any property." Therefore, while the Central City Community Plan will be the primary document the City uses to evaluate consistency with the General Plan, an analysis of the consistency of the Project with the Framework Element has also been included for informational purposes.

⁴ Los Angeles Department of City Planning, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Figure 3-1: Long Range Land Use Diagram—Metro*, re-adopted by City Council on August 9, 2001.

incompatible land uses.

(3) Urban Form and Neighborhood Design Chapter

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

(4) Open Space and Conservation Chapter

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

(5) Economic Development Chapter

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

(6) Transportation Chapter

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. The goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. The City Council initially adopted Mobility Plan 2035 in August 2015 as an update to the

Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January 2016 and again in September 2016 upon consideration of additional amendments.⁵ Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035.

(7) Infrastructure and Public Services Chapter

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

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project Site is included in Table 1 in Appendix F of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

(ii) Mobility Plan 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, the Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that

⁵ Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.*

is suitable to the rural, suburban or urban context.” Mobility Plan 2035 includes the following five main goals that define the City’s high-level mobility priorities:⁶

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

Each of the goals contains objectives and policies to support the achievement of those goals.

The Project’s consistency with applicable policies in the Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project Site is included in Table 2 in Appendix F of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal, objective, or policy.

(iii) General Plan Housing Element

The Housing Element states that the City’s housing goals, objectives, policies and programs are guided by the City’s overall housing vision, which is to create for all residents a city of livable and sustainable neighborhoods with a range of housing types, sizes and costs in proximity to jobs, amenities and services. The Housing Element 2013–2021 identifies four primary goals and associated objectives, policies and programs. The goals are as follows:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs;
- A City in which housing helps to create safe, livable and sustainable neighborhoods;

⁶ *City of Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.*

- A City where there are housing opportunities for all without discrimination; and
- A City committed to ending and preventing homelessness.

The Project's consistency with the applicable objectives and policies set forth in the Housing Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives and policies of the Housing Element applicable to the Project Site is included in Table 3 in Appendix F of this Draft EIR along with a discussion of whether or not the Project does or does not conflict with that particular objective or policy.

(iv) General Plan Conservation Element

The General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. More specifically, the Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.⁷ The Project's consistency with applicable Conservation Element objectives and is analyzed later below.

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

The Plan for a Healthy Los Angeles is the Health and Wellness Element of the General Plan. Adopted in March 2015, the Health and Wellness Element provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development.⁸ The Health and Wellness Element sets forth two policy objectives: (1) to elevate existing health-oriented policies in the General Plan; and (2) where policy gaps exist, to create new policies to reinforce the City's goal of creating healthy, vibrant communities. The Health and Wellness Element identifies seven primary goals and identifies policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. These goals relate to: health and equity; development that supports physical, mental, and social well-

⁷ *City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.*

⁸ *Los Angeles Department of City Planning, Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, March 2015.*

being; parks and open space; healthy food resources; promoting a healthy environment; education and economic prosperity; and safe and just neighborhoods. Although most of these goals apply at a regional or citywide level, the Project's consistency with applicable goals in the Health and Wellness Element is presented in the impact analysis below.

(b) Central City Community Plan

The Project Site is located within the Central City Community Plan area.⁹ Adopted January 8, 2003, the Central City Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the Framework Element. The Community Plan identifies and provides for economic opportunities and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Community Plan area.

The Central City Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by¹⁰:

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

The Community Plan's land use designation for the Project Site is Regional Center Commercial, as illustrated in Figure IV.F-1 on page IV.F-9.

⁹ *City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 332 South Olive Street, <http://zimas.lacity.org>, accessed May 18, 2020.*

¹⁰ *Page II-2 of the Central City Community Plan.*

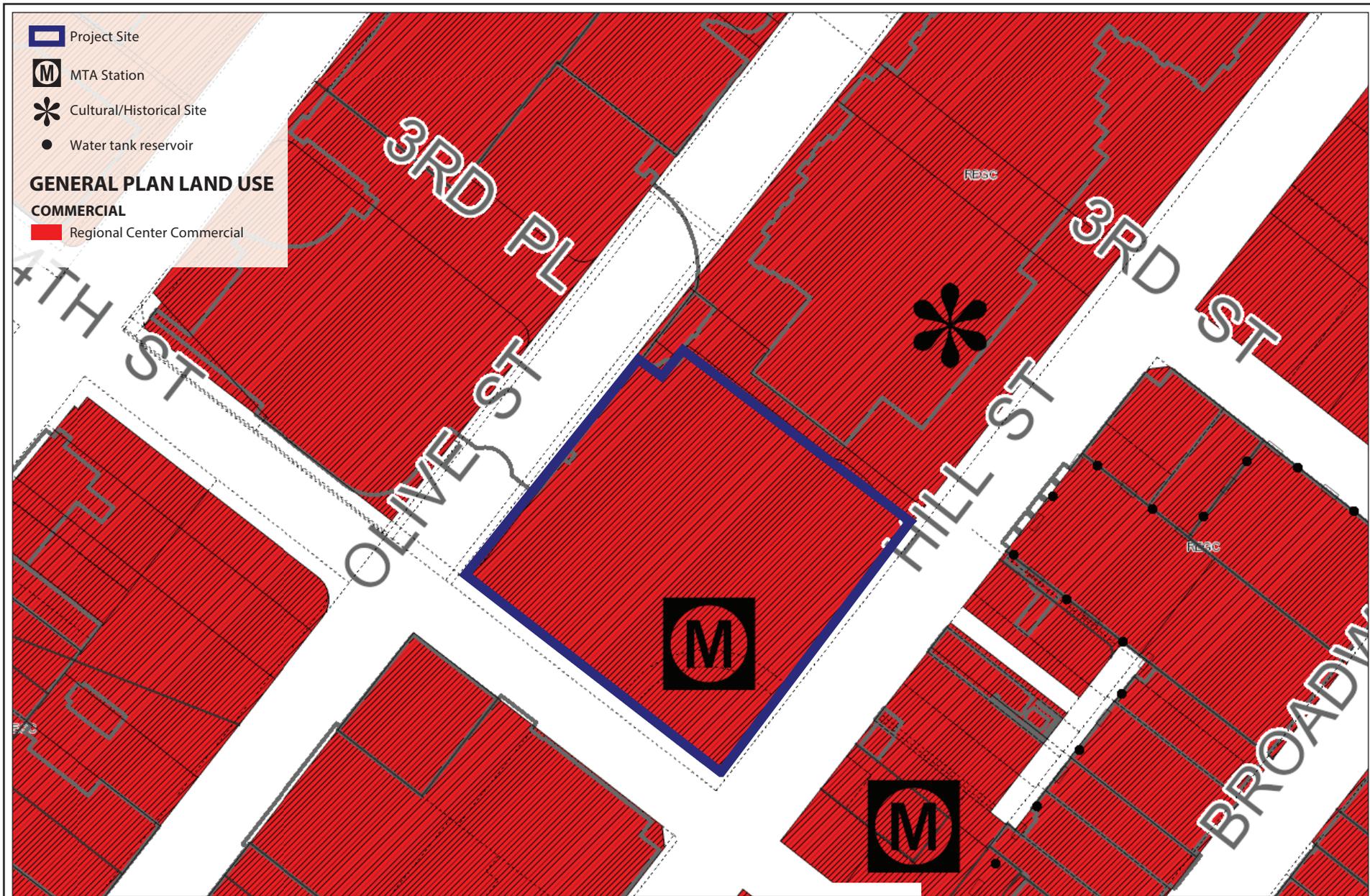


Figure IV.F-1
Land Use Designation on the Project Site

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

(c) Downtown Community Plan (DTLA 2040 Plan)

The City of Los Angeles Department of City Planning is currently updating the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the Downtown Community Plan (DTLA 2040 Plan). The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.¹¹ Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:¹²

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

As currently proposed by the DTLA 2040 Plan, the Project Site will be designated as part of the Transit Core, which will allow a maximum floor area ratio (FAR) of between

¹¹ *City of Los Angeles, Downtown Los Angeles Community Plan Update, About, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about> accessed May 18, 2020.*

¹² *City of Los Angeles, Downtown Los Angeles Community Plan Update, Purpose, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about>, accessed May 18, 2020.*

10:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.¹³ The DTLA 2040 Plan proposes the following description of the Transit Core area:¹⁴

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

The proposed zoning comprises the following districts: [Form – Frontage – Standards] [Use – Density]. The first "bracket set" contains the zoning districts that determine the built environment, and the second "bracket set" contains the zoning districts that determine the types of activities on a lot. Although the zoning districts may refer or have standards that are tied to other districts, each is independent and are combined in response to the variety of planning needs found throughout the City. The Project Site is zoned [HUB4-G1-5][XG1-FA][CPIO] in the Draft Zoning Map. This corresponds with High-Unspecified-Broad 4 Form (HUB4), General 1 Frontage (G1), District 5 Standards (5), Commercial-Mixed General 1 Use District (XG1), and Lot Area-Based District that limits density by floor area (FA).¹⁵ The zoning also includes a Community Plan Implementation Overlay (CPIO) District which provides supplemental regulations.

The DTLA 2040 Plan will inform developers and homeowners of allowable development options, densities, and intensities; outline strategies for how to accommodate planned growth; and bring the Central City Community Plan up-to-date as an improved planning tool.¹⁶ The DTLA 2040 Plan process began in 2014, and the City released a

¹³ Los Angeles Department of City Planning, *Downtown Los Angeles Community Plan Update (DTLA 2040)*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed May 18, 2020.

¹⁴ City of Los Angeles, *Downtown Community Plan, June 2019 Draft*.

¹⁵ *Downtown Community Plan Update/New Zoning Code for Downtown Community Plan, August 2020, Appendix D—Downtown Community Plan Zoning Maps and Appendix G—New Zoning Code*.

¹⁶ City of Los Angeles, *Downtown Community Plan, Overview of the Draft Downtown Community Plan*, <https://ladcp.maps.arcgis.com/apps/Cascade/index.html?appid=75aef784670f484ba62acf77feb5ece3>, accessed May 18, 2020.

preliminary draft of the plan in July 2019.¹⁷ Additionally, the City released the proposed zones and zoning map for the DTLA area in October 2019 and announced a series of open houses in November.¹⁸ In January and February 2020, the City hosted outreach through office hours events. Between February and July 2020, the City prepared the Draft EIR for the DTLA 2040 Plan. In August 2020, the City released the preliminary draft of the new Zoning Code, refined Draft Downtown Community Plan Text, Land Use Designation Map, Zoning Map, Community Plan Implementation Overlay (CPIO), and Draft EIR, with a public comment period through December 4, 2020, and virtual public hearing on December 8, 2020.¹⁹

(d) Los Angeles Municipal Code—Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Figure IV.F-2 on page IV.F-13, the Project Site is zoned as C2-4D (Commercial Zone, Height District 4 with Development Limitations).²⁰ The Commercial zones permit a wide array of commercial land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. Height District No. 4 within the C2 zone does not impose any height limit but restricts development to a maximum FAR of 13:1. However, the maximum permitted floor area on the Project Site is restricted by the “D” limitation, which limits the FAR to 6:1 without a transfer of floor area rights (TFAR), pursuant to Ordinance No. 164,307. The “D” zoning restriction is superseded by the Bunker Hill Specific Plan’s 13:1 FAR allowance for the Project Site (discussed below).

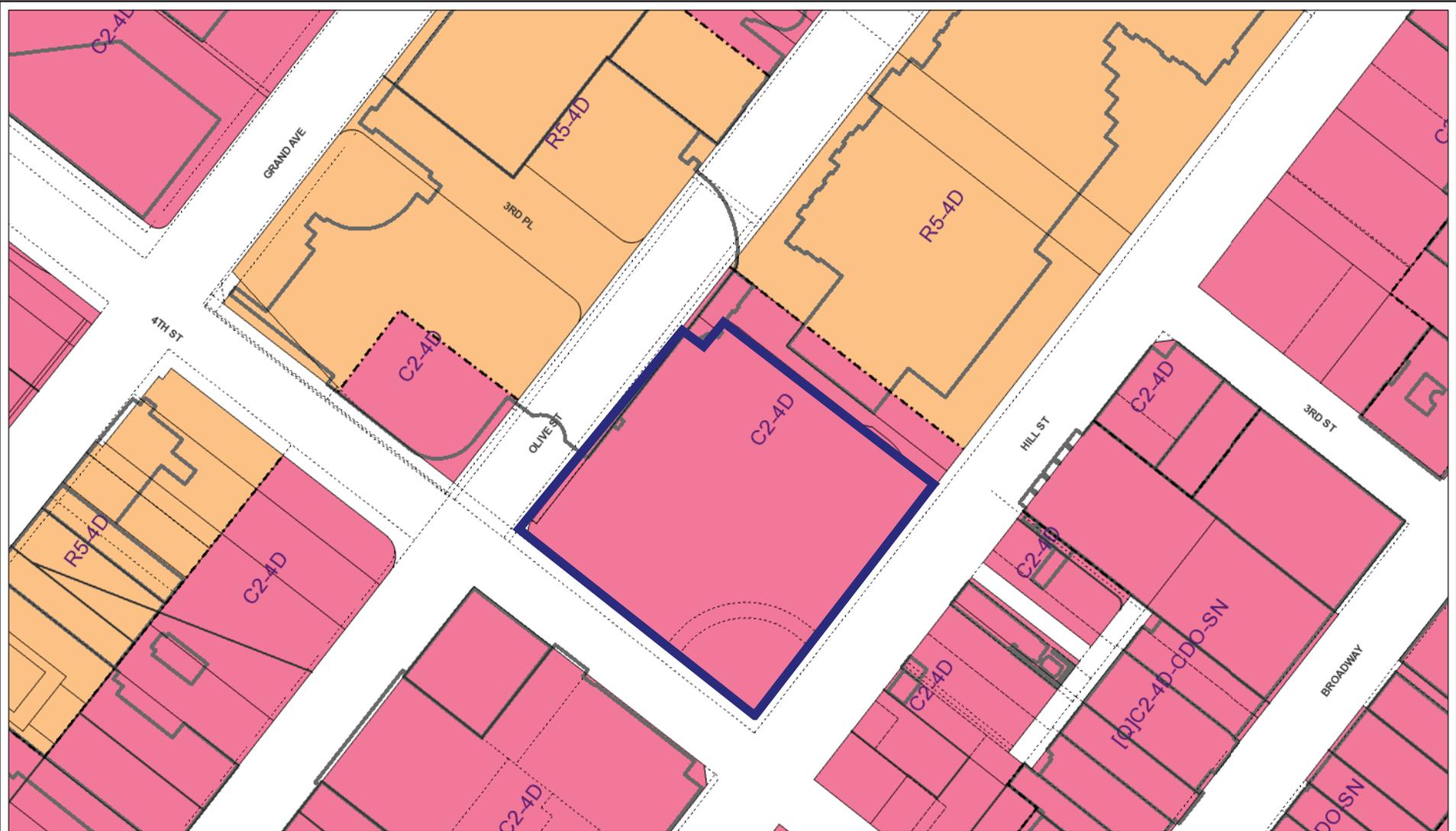
Residential density is typically governed by a site’s zoning designation. For properties zoned C2 with a Regional Commercial General Plan land use designation, residential density is subject to R5 zoning restrictions which limit residential density to one dwelling unit per 200 square feet of lot area. However, the Bunker Hill Specific Plan (discussed below) Section 7.G provides that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC.

¹⁷ City of Los Angeles, *Downtown Los Angeles Community Plan Update, Draft Plan*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#draft-plan>, accessed May 18, 2020.

¹⁸ City of Los Angeles, *Downtown Community Plan Update, Background & FAQs*, October 2019.

¹⁹ City of Los Angeles, *Downtown Los Angeles Community Plan Update, Outreach Timeline*.

²⁰ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 332 South Olive Street*, <http://zimas.lacity.org>, accessed May 18, 2020.



GENERALIZED ZONING

- C2
- R5
- Project Site

Figure IV.F-2
Zoning Designations on the Project Site

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

Floor area bonuses also are permitted in this area, as set forth in LAMC Section 12.22 A 29. More specifically, incentives including a 35-percent increase in total floor area, a 50-percent reduction in the open space requirement, and minimal to no parking requirement for certain types of low income units may be granted if 5 percent of dwelling units are provided for Very Low Income households; 10, 15, or 20 percent of dwelling units are provided for Low Income, Moderate Income, or Workforce Income households, respectively; and any demolished unit occupied by a household earning less than 50 percent of the Area Median Income must be replaced on a one-for-one basis within the same Community Plan area. The Project's consistency with applicable LAMC requirements is presented in the impact analysis below.

(e) Bunker Hill Specific Plan

Prior to the dissolution of redevelopment agencies in California, the Bunker Hill Urban Renewal Project was the oldest active redevelopment project in the City, having been adopted in March 1959, and amended in 1968, 1986, 1990, 1994, 2003, and 2006. To guide development within the Bunker Hill Urban Renewal Project area, the CRA adopted the Design for Development plan in May 1968 (amended in 1971, 2001, and 2008). The Design for Development plan provided urban design principles for proposed development within the Bunker Hill Urban Renewal Project/Bunker Hill Redevelopment Project area. The Design for Development plan initially established a maximum area-wide FAR of 5:1. At this FAR, approximately 19.1 million square feet of total development was allowed in the Bunker Hill Urban Renewal Project/Bunker Hill Redevelopment Project area. An amendment to the Design for Development to allow an increase in the FAR to 6:1 was proposed in 2008 and an EIR, referred to as the Bunker Hill Amended Design for Development EIR, was prepared to evaluate the potential environmental impacts of the proposed amendment. The proposed Amended Design for Development, which was adopted by CRA in 2008, allowed for an additional 3.9 million square feet to be built in Bunker Hill, and it specifically earmarked approximately 362,000 square feet of floor area to increase the development capacity of the Y1 Parcel—comprised of the Project Site and the adjacent Angels Flight parcel—to approximately 1.3 million total square feet.

The City adopted the Bunker Hill Specific Plan in 2013 to replace and refine the regulations of the prior redevelopment plan. The Bunker Hill Specific Plan is one of the primary land use documents that regulates development rights on the Project Site. The Bunker Hill Specific Plan combined with the Central City Community Plan encourages mixed-use districts with expanded housing opportunities and commercial retail uses that

can create a 24-hour Downtown environment. The Bunker Hill Specific Plan also encourages infill development that enlivens the street and public spaces, as well as a mix of land uses that support high levels of transit use and additional employment opportunities. The Bunker Hill Specific Plan controls the types of uses and permitted development densities within its boundary. Pursuant to the Specific Plan, previous development capacities allotted in the former Bunker Hill Redevelopment Project remain in effect. In other words, the floor area rights set forth in the Bunker Hill Specific Plan are the same as the previous allowable development capacities for each parcel. Appendix A of the Bunker Hill Specific Plan identifies the remaining floor area rights of the Y1 Parcel, which includes the Project Site and Angels Flight, as 1,390,900 square feet, which translates to an approximate FAR of 13:1. To prepare the Y1 Parcel for disposition, a lot split was performed and delineated the Project Site from the Angels Flight parcel, which resulted in the Project Site retaining approximately 1,269,359 square feet of remaining floor area for development of the Project.

Consistent with the Project Site's C2 zoning, the Bunker Hill Specific Plan specifically authorizes hotels, multifamily residential, entertainment, commercial recreation, health club, restaurant and outdoor eating areas at the site. With regards to yards and setbacks, Specific Plan Section 7.E states that yard requirements do not apply except as required by the applicable urban design standards. As such, the provisions of the Downtown Design Guide (discussed below) apply to all properties in the Bunker Hill area, including the Project Site. See the impact analysis later in this section for applicable yard and setback requirements.

With regard to parking, the Specific Plan parking standards supersede LAMC Section 12.21 requirements. For projects within 1,500 feet of a fixed rail transit station, the Specific Plan requires a minimum of 0.25 space per unit for residential units with less than two habitable rooms and 0.5 space per unit for all other units. The Specific Plan has no minimum parking requirement for hotel or non-residential uses for projects within 1,500 feet of a fixed rail transit station.

As discussed in the Specific Plan, the regulations set forth therein are in addition to those set forth in the LAMC, as amended, and do not convey any rights or privileges not otherwise granted under the provisions and procedures contained therein, except as specifically provided in the Bunker Hill Specific Plan. Wherever the Specific Plan contains provisions that require lesser or greater restrictions or limitations on development than would be allowed or required pursuant to the provisions contained in Chapter 1 of the LAMC, the Bunker Hill Specific Plan prevails.

The land use designations currently in the Specific Plan will be replaced with the land use designations in the DTLA 2040 Plan. The purpose and provisions of the Specific Plan will be implemented through the New Zoning Code provisions. The Transit Core

designation of the DTLA 2040 Plan would accommodate the types of uses and intensities envisioned in the Specific Plan, thus furthering Specific Plan goals.²¹

(f) Downtown Design Guide: Urban Design Standards and Guidelines

The Downtown Design Guide: Urban Design Standards and Guidelines (Downtown Design Guide), revised and adopted in June 2017, supplements the General Plan Framework Element, Central City Community Plan, and LAMC in promoting high quality design and architecture while preserving the character and scale of Downtown Los Angeles. To encourage the development of a more sustainable community, the Downtown Design Guide calls for sound choices at all levels of planning and design—from land use and development decisions to building massing and materials choices—with an emphasis on walkability and the creation of great streets, districts, and neighborhoods. The focus of the Downtown Design Guide is on the relationship of buildings to the street, including sidewalk treatment, building character adjacent to sidewalks, and transit connections. The successful treatment of these key features, coupled with attention to building façade details in the first 30 to 40 vertical feet, forms the basis for providing high quality development at a human scale.²² Analysis of the Project’s consistency with applicable design principles, standards, and guidelines in the Downtown Design Guide is discussed in the impact analysis below.

(g) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element’s urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans.²³ By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission on October 24, 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The Citywide Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360

²¹ *Downtown Community Plan Update/New Zoning Code for Downtown Community Plan, August 2020, p. 4.10-49.*

²² *City of Los Angeles, Downtown Design Guide, June 2017.*

²³ *The Citywide Design Guidelines apply to all areas of the City but are particularly applicable to those areas where geographically specific design guidelines have not been adopted. In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter or a specific plan, the community-specific requirements shall prevail.*

Degree Design and Climate-Adapted Design. Within each design approach are a number of design guidelines. Each guideline includes a menu of best practices that might be utilized to meet the intent of each guideline. The best practices are not mandatory but provide examples of how guidelines can be achieved. The best practices are organized into one of three spatial categories: Site Planning, Building Design, and Right-of-Way. The provisions set forth in the Citywide Design Guidelines identify the desired level of design quality for all developments. However, flexibility is necessary and creativity encouraged to achieve excellence in design. Therefore, the use of the words “shall” and “must” have been purposely avoided within the specific guidelines. Applications that do not substantially conform to specific guidelines should provide rationale for an alternative design approach.²⁴ Per the Citywide Design Guidelines, in instances where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter, a specific plan, or a community-specific guidelines, such as the Downtown Design Guide, the community-specific requirements prevail.²⁵

The City’s Urban Design Studio, which is part of the Department of City Planning, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals, and provides project-specific recommendations organized around the three distinct design approaches mentioned above drawing upon the latest advancements in climate-adapted design, recognizing the role of a building’s form can play in the local climate.²⁶ The Project was submitted for, and has completed, design review with the Urban Design Studio. The Project’s design team presented the Project to the Urban Design Studio on May 16, 2019, which included a review of the Project Site’s unique site challenges, including steep slope, Metro portal occupying a considerable portion of the site, the 100-foot vertical distance between the Metro portal and Upper California Plaza, adjacency to California Plaza overbuild and covered portion of Olive Street, relation to Angels Flight, and limited points for vehicle access. The Urban Design Studio appreciated the design solutions, including stepped exterior terraces between the towers, pedestrian circulation through the site and along Angels Flight, separate porte cocheres for each tower to limit concentration of vehicles, multiple entry points, and active uses around open spaces and along 4th and Hill Streets. The Project design incorporated design comments to the extent feasible on the Project Site.

The Project’s consistency with the objectives of the Citywide Design Guidelines for residential and commercial projects is discussed in the impact analysis below.

²⁴ *City of Los Angeles Department of City Planning, Citywide Design Guidelines, October 24, 2019, p. 9.*

²⁵ *City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed Use Projects, Checklist for Project Submittal*

²⁶ *City of Los Angeles Department of City Planning, Urban Design Studio, planning.lacity.org/urbandesign/, accessed May 19, 2020.*

(h) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. Department of City Planning (DCP) staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and all community members to enhance pedestrian movement, access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects that require discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.²⁷

In the field of urban design, walkability is the measure of the overall walking conditions in an area. Different factors have been identified with regard to enhancing walkability in the private versus public realms. Specific factors influencing walkability within the private realm (private areas of projects) include building orientation, building frontages, signage and lighting, on-site landscaping, and off-street parking and driveways. Contributors influencing walkability within the public realm include sidewalks, crosswalks/street crossings, on-street parking, and utilities. Street connectivity, access to transit, aesthetics, landscaping, and street furniture are additional components that are discussed in the Walkability Checklist as they also influence the pedestrian experience.

As with the design principles included in the Urban Form and Neighborhood Design Chapter of the Framework Element, the guidelines provided in the Walkability Checklist are not appropriate for every project. The primary goal is to consider the applicable guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm.

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

²⁷ *City of Los Angeles Department of City Planning, Walkability Checklist Guidance for Entitlement Review, November 2008.*

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

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

- *“Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.*
- *“Transit priority area” means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”*

In addition, PRC Section 21064.3 defines the following:

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

The Project is a mixed-use development that includes 180 condominium units; 252 apartments (including a mix of market and affordable units, with affordable housing comprising 5 percent or 13 units of the total units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities; and approximately 72,091 square feet of general commercial uses. The Project Site is located on an infill site that is less than 0.5 mile from several major transit stops. Specifically, the Project Site is located within 1,500 feet of the Los Angeles County Metropolitan Transportation Authority (Metro) B (formerly known as Red) and D (formerly known as Purple) Lines Pershing Square Station portal, which is 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 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 2/302, 4, 10/48, and 794.

Therefore, the Project qualifies as a mixed-use residential and employment center project on an infill site within a transit priority area. In addition, the City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a transit priority area, as defined in City Zoning Information (ZI) File No. 2452.²⁸

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

The City of Los Angeles has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), Los Angeles Department of Water and Power (LADWP) 2015 Urban Water Management Plan (UWMP), Los Angeles Fire Department Strategic Plan, Los Angeles Public Library Strategic Plan 2015–2020, Public Recreation Plan, 2010 Bicycle Plan (a part of the General Plan's Mobility Plan 2035), and LA's Green New Deal. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR, and in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR.

(2) Regional

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), which addresses the attainment of state and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

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

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

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

²⁸ *City of Los Angeles ZI No. 2452 provides instruction concerning the definition of transit priority projects and states "[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [L.A. CEQA Thresholds Guide] shall not be considered an impact for infill projects within TPAs pursuant to CEQA."*

2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. Further, it balances the region’s future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions (GHG) through integrated transportation, land use, housing and environmental planning. Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for “High Quality Transit Areas,” “Livable Corridors,” and “Neighborhood Mobility Areas” as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. High-Quality Transit Areas (HQTAs) are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways. Neighborhood Mobility Areas are areas with roadway networks where Complete Streets and sustainability policies support and encourage replacing single and multi-occupant automobile use with biking, walking, skateboarding, and slow speed electric vehicles. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.^{29,30}

On September 1, 2020, SCAG’s Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.³¹ As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.³² On October 30, 2020, the California Air Resources Board (CARB) made the determination that the 2020–2045 RTP/SCS would meet the region’s GHG reduction target. The goals and policies of the 2020–2045

²⁹ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016.

³⁰ Los Angeles County Metropolitan Transportation Authority (Metro), High Quality Transit Areas—Southwest Quadrant map.

³¹ SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

³² SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as analyzed later in Table 5 in Appendix F of this Draft EIR, the Project would also be consistent with the 2020–2045 RTP/SCS.³³ Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on March 29, 2019, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

The Project's consistency with applicable goals of the 2016–2040 RTP/SCS for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below. A detailed list of the goals of the 2016–2040 RTP/SCS applicable to the Project Site is included in Table 5 in Appendix F of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal.

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

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, the SCAQMD has prepared the 2016 AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section IV.A, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the AQMP.

b. Existing Conditions

(1) Project Site

The 97,643-square-foot (2.24-acre) Project Site is centrally located in Downtown Los Angeles, on the southern edge of the Bunker Hill neighborhood. More specifically, the Project Site is bordered to the south by 4th Street and to the east and west by Hill Street and Olive Street, respectively. The Project Site connects Olive Street and the California

³³ For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within a High Quality Transit Area (HQTA) immediately adjacent to a Metro light rail station and in close proximity to more than a dozen bus routes, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.

Plaza levels above Olive Street with Hill Street, creating a pedestrian linkage between the Financial District and the Bunker Hill/Historic Core areas in Downtown. The Project Site includes a publicly accessible stairway from Hill Street to Olive Street and California Plaza along its northern border. The historic Angels Flight funicular is also adjacent to the northern border of the Project Site.

The Project Site is mostly vacant, except for the Metro B/D Lines Pershing Square Station portal located at the southeast corner of the Project Site. The Project Site is landscaped, generally unmaintained, and fenced off to prevent public access. The majority of the Project Site has been closed to public access for several years, except for the Metro portal. The topography of the Project Site slopes down from the northeast along Olive Street at approximately 356 feet above mean sea level (msl) to the southwest near the Hill Street/4th Street intersection at approximately 285 feet msl (an elevation differential of approximately 71 feet).

As indicated previously, the Project Site is located within the Central City Community Plan area and is designated therein as Regional Center Commercial, as shown in Figure IV.F-1 on page IV.F-9. As shown in Figure IV.F-2 on page IV.F-13, the Project Site is zoned C2-4D (Commercial Zone, Height District 4 with Development Limitations). The Project Site is also located within the Bunker Hill Specific Plan area, the Greater Downtown Los Angeles Housing Incentive Area, and a TPA, as well as a SCAG-designated HQTA. Appendix A of the Bunker Hill Specific Plan identifies remaining floor area rights on the Y1 Parcel for the Project Site as 1,269,359 square feet, which translates to an approximate FAR of 13:1.

The walkability of a location is based largely on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. As previously described, the Project Site includes the California Plaza which serves as a pedestrian linkage between the Financial District and the Bunker Hill/Historic Core areas in Downtown. The Project Site also includes a publicly accessible stairway from Hill Street to Olive Street and California Plaza. Considering the Project Site's close proximity to local jobs, shopping services, and transit, the street addresses at the Project Site have walkability scores ranging 97 to 98 out of 100, which is considered a "Walker's Paradise."³⁴ Additionally, given the proximity to transit, specifically the Metro B/D Lines Pershing Square Station portal located on-site, the street addresses at the Project Site have a transit score of 100, which is considered a "Rider's Paradise." The Project Site has a bike score ranging from 54 to 75. Scores between 50 to 69 are considered "Bikeable," meaning there is some bike

³⁴ *Walk Score (www.walkscore.com) rates the Project Site with a score of 97 of 100 possible points (scores accessed on May 15, 2020). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.*

infrastructure available; and scores between 70 and 89 are considered “Very Bikeable,” meaning biking is convenient for most trips. All of these factors contribute to the overall walkability and pedestrian environment of the Project Site and surrounding area.

(2) Surrounding Uses

The grade difference of the Project Site presents a unique setting relative to the surrounding land uses. The Project Site’s location serves to bridge Olive Street on the northwest with Hill Street to the southeast, creating a pedestrian linkage between the Financial District and Bunker Hill/Historic Core. The historic Angels Flight creates the northern border of the Project Site, positioning the Project Site adjacent to one of Downtown’s most recognized and celebrated pieces of neighborhood history.

Beyond the bounding streets, to the north of the Project Site is the Angelus Plaza Apartments and 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 the Two California Plaza mixed-use office complex and the Omni Hotel to the north and west, including California Plaza, an active public open space that is part of a great open space network between the Downtown skyscrapers. To the east, across Hill Street, are several restaurants and the Grand Central Market. To the south, across 4th Street are two above grade parking structures and the Metro 417 apartment building. The uses surrounding the Project Site are primarily designated Regional Center Commercial and zoned C2-4D or R5-4D, as shown in Figure IV.F-2 on page IV.F-13. More broadly in terms of neighborhoods, the Project Site is surrounded by the Financial District to the west, the City’s Historic Core to the east; the Civic Center and Grand Park nearby to the north and west; and the Jewelry District, Pershing Square, Restaurant Row on 7th Street, and South Park, to the south. For a map identifying the existing land uses in the Project vicinity, refer to Figure II-2, Aerial Photograph of the Project Site and Vicinity, in Section II, Project Description, of this Draft EIR.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community.

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

For this analysis, the Appendix G Thresholds listed above are relied upon.

The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate land use consistency:

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

b. Methodology

The analysis of potential land use impacts considers the Project's consistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents. CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

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

Analysis of conflicts and consistency with applicable plans is included in this impact section. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct

other policies.³⁵ More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.³⁶ Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan but need not be in perfect conformity with every plan policy.

c. Project Design Features

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

d. Analysis of Project Impacts

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

As discussed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the Project Site represents an urban infill site, and the Project Site’s location creates a pedestrian linkage between Downtown’s Historic Core and Bunker Hill. The Project would not close any existing street and would provide pedestrian access through the Project Site where no such access currently exists. The Project Site is mostly comprised of a vacant lot and does not contain residents or community uses; thus, the Project would not displace any residents or interrupt any other established community elements. Therefore, the Project would not physically divide the community, and impacts with respect to Threshold (a) would be less than significant. No further analysis of this issue is required or provided in this section.

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

³⁵ State of California Office of Planning and Research, *General Plan Guidelines*, 2017.

³⁶ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

(1) Impact Analysis

(a) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the applicable goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Housing Element, Conservation Element, and Health and Wellness Element; Central City Community Plan; DTLA 2040 Plan; LAMC (Zoning Code); Bunker Hill Specific Plan; Downtown Design Guide; Citywide Design Guidelines; and the City's Walkability Checklist that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Los Angeles General Plan

(1) Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 1 in Appendix F of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

The Project Site has a Regional Center Commercial land use designation. Pursuant to the Framework Element, Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity. Regional Centers are characterized as providing a diversity of uses. The Framework Element encourages mixed-use developments in Regional Centers, integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces, and amenities. Regional Centers typically provide a significant number of jobs and should function as a hub for regional bus and rail transit. Corresponding zoning designations that are consistent with the Regional Center Commercial land use designation include CR, C1.5, C4, and C2 zones. The Project would support and would be consistent with the Framework Element Land Use Chapter as it would contribute to the needs of the City's existing and future residents, businesses, and visitors by providing a mixed-use development consisting of 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units, with affordable housing comprising five percent of the total rental units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); 72,091 square feet of general commercial (retail/restaurant) uses; and 56,881 square feet of public and private open space. Further,

these uses would be integrated with the existing Metro B/D Lines Pershing Square Station portal located on-site.

As envisioned by the General Plan, the Project would result in the redevelopment of a vacant site with a mixed-use development integrating housing with commercial and visitor-serving uses. The Project would be a focal point of Downtown Los Angeles, and its central location and adjacency to mass public transit, would allow it to function as a transit hub.

The Project would also be consistent with surrounding uses and create a seamless transition between Bunker Hill and the City's Historic Core. Currently, the largely undeveloped Project Site is not advancing the goals for the General Plan. Development of the Project would convert this vacant parcel into a global destination. The addition of 515 hotel rooms would serve tourists visiting nearby cultural attractions like the Walt Disney Concert Hall and Broad Museum, as well as business travelers and convention goers. The proposed housing would increase the supply of for-sale and for-rent housing and provide a mix of affordable and market-rate dwelling units.

Furthermore, as discussed in detail in Table 1 in Appendix F of this Draft EIR, the Project would not conflict with applicable objectives and policies of the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the mixed-use nature of the Project would create a diverse mix of uses that would support the needs of the City's existing and future residents, businesses, and visitors (Objective 3.1). The Project would also support Objectives 2.2 and 3.2 to promote an improved quality of life by providing for a spatial distribution of development that promotes a reduction of vehicular trips, vehicle miles traveled (VMT) and air pollution, as the proposed uses would represent high density mixed-use development on an urban infill site with convenient access to public transit and opportunities for walking and biking. The Project would encourage new multi-family residential and retail uses in a Regional Center along primary transit corridors; and conserve existing neighborhoods and districts by focusing development within an infill site without displacing or otherwise impinging on existing low-density residential uses in the area (Objectives 3.4 and 3.15). In addition, the Project would support Policy 3.7.1 to accommodate multi-family residential units on a site permitted for such uses. Project consistency with the above objectives and policies would avoid or reduce environmental effects (such as less vehicle miles travelled, reduced use of single occupant vehicles and a corresponding reduction in greenhouse gas and air quality criteria pollutants), as the Project would create new housing opportunities as well as a diverse mix of uses to accommodate the needs of the City within close proximity to public transit. Lastly, the Project would support Objective 3.16 to accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity by enhancing the existing sidewalks along the Project Site's street frontages; providing on-site pedestrian plazas and multiple pedestrian routes through the

Project Site; providing pedestrian connections between the proposed on-site uses, Angels Flight, California Plaza, and the Metro B/D Lines Pershing Square Station; and limiting curb cuts along Hill Street to maintain existing pedestrian movement to/from the Metro Station.

Overall, the Project would be consistent with and further the applicable requirements, objectives, and policies that support the goals set forth in the Framework Element's Land Use Chapter.

(b) Housing Chapter

The Housing Element Chapter of the General Plan Framework provides goals and policies to guide future residential development and address issues relating to housing. The Housing Element states that the City must strive to meet the housing needs of the population in a manner that contributes to a stable, safe, and livable neighborhoods, and improves access to jobs and neighborhood services, particularly by encouraging future housing develop near transit corridors and stations. The Project would be consistent with this overall goal by providing a range of new housing opportunities, including affordable housing, within Downtown in close proximity to existing jobs and with safe and easy access to transit (including the on-site Metro B/D Lines Pershing Square Station portal and multiple existing bus routes).

The Project would also support specific applicable Housing Chapter goals and objectives. For example, the Project would support the Objective 4.1 to encourage various housing types to meet future housing needs at different income levels by providing a variety of new multi-family residential units, including 180 for-sale condominium units (51 one-bedroom units, 91 two-bedroom units, 38 three-bedroom units) and 252 market rate and affordable apartment units (42 studio units, 126 one-bedroom units, 60 two-bedroom units, and 24 three-bedroom units), with affordable housing comprising five percent of the total units. The affordable housing component of the Project is a voluntary contribution of affordable housing units to the City's supply because the Project is consistent with the zoning and land use designations on the Project Site and does not trigger any other legal requirements that would mandate affordable housing. The Project would also support the Objective 4.2 to encourage new multi-family housing in proximity to transit by locating the proposed mix of multi-family housing types in an area well-served by public transit, particularly since the Project Site is a City-designated TPA and a SCAG-designated HQTAs. Project consistency with the above objectives and policies would avoid or reduce environmental effects. Therefore, as discussed in further detail in Table 1 in Appendix F of this Draft EIR, the Project would not conflict with the applicable objectives that support the goals set forth in the Framework Element's Housing Chapter.

(c) Urban Form and Neighborhood Design Chapter

As previously described, the Project would include a mix of residential, hotel, retail, restaurant, general commercial, and both public and private open space uses. The active uses on the ground floor and surrounding the public plazas would enhance security in the area by putting eyes on the street and creating a walkable environment. The Project's pedestrian linkages and paseos would create a key connection between existing businesses and residents in Bunker Hill and the Historic Core areas, which are located on opposite sides of the Project Site. These improvements would also improve livability in the area and benefit the residents of the Project and in the surrounding community by improving the walkability and safety of the neighborhood. In addition, the Project's proximity to rail and bus transit would promote the use of public transportation. Further, the contemporary design of the Project would complement the existing neighborhood and be consistent with other proposed development in the area.

The Project would also support specific applicable Urban Form and Neighborhood Design Chapter goals and objectives. Specifically, the Project would further the Objective 5.2 to encourage development in centers along transit by introducing a high-density mixed-use development on an urban infill site in Downtown, with an existing Metro portal located on-site. The Project would also enhance the livability of the Project Site and neighborhood (Objective 5.5), reinforce the establishment of a strong pedestrian orientation (Objective 5.8), and incorporate proper design and effective use of the built environment to increase personal safety (Objective 5.9). Specifically, the Project would support Objective 5.5 by distributing the proposed uses throughout a series of terraced levels and in two towers constructed above a subterranean parking lot. Additionally, various common and private open space areas and recreational amenities would be incorporated throughout the Project Site. The Project would also provide common open space, including plazas, gardens, courtyards, and landscaped terraces, that would be generally available to the public during daytime and evening hours. The Project would support Objectives 5.2 and 5.8 by renovating the arrival plaza at the Metro Pershing Square Station portal, enhancing access to the Angels Flight funicular, 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. Specifically, the Project would improve the visitor and commuter experience at the Metro Station by introducing a café near the existing station access stairs and escalators. The Project would support Objective 5.9 by including proper lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify secure pedestrian travel routes between the parking areas and points of entry into the buildings; provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment; and design building entrances/exits, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. The urban form and character of the Project blends together elements of the existing Bunker Hill and Historic Core neighborhoods by placing tall tower components on Project Site (which reflect the high rise buildings in adjacent Bunker Hill) while also including grade-level open

spaces, terraces and retail uses in the lower podium levels of the structures (which reflects the lower-rise uses in the Historic Core) to create a functional linkage between the two neighborhoods that does not exist under current conditions.

Project consistency with the above objectives and policies would avoid or reduce environmental effects, as the Project would enhance the livability and experience of the Project Site and surrounding areas. Therefore, as discussed in detail in Table 1 in Appendix F of this Draft EIR, the Project would not conflict with the applicable objective that supports the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

(d) Open Space and Conservation Chapter

The Project would support the goals and policies of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. The Project would offer a total of 56,881 square feet of open space, including exterior common area and additional interior common area, which would exceed the requirements of the LAMC (as discussed further below) and serve to reduce the demand on parks and recreational facilities in the vicinity of the Project Site. The Project would provide common open space in the form of plazas and landscaped terraces (the Hill Street Plaza, Angels Terrace, Olive Street Plaza, Terrace and Upper California Plaza Extension), gardens, courtyards, and a decorative staircase connecting Hill Street to Olive Street, which would be publicly accessible. The interior common areas would include residential amenities, such as fitness areas, game rooms, lounges, and meeting rooms.

As detailed in Table 1 in Appendix F of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter. In particular, the Project would be consistent with Policy 4.4.8, which calls for the development of public plazas among other common open space areas, by providing multiple common open space areas that would be publicly accessible, including Angels Terrace and areas with seating and shade trees on the Hill Street and California Plaza levels (for a total of three levels of publicly accessible common open space). The Project would also be consistent with Policy 6.4.11, which calls for siting open space adjacent to existing public facilities, by providing open space adjacent to Angels Flight, California Plaza³⁷, and the Metro B/D Lines Pershing Square Station portal and by providing pedestrian connections between these uses and the proposed on-site open space network.

³⁷ *California Plaza is the open space area associated with One California Plaza (the tower).*

(e) Economic Development Chapter

The economic development policies in the Economic Development chapter are designed to facilitate business retention and job growth in several important ways. These include providing appropriate sites and infrastructure to accommodate future commercial and industrial growth; streamlining the City's permitting and regulatory processes; focusing the City's economic development efforts to more effectively utilize available resources; and, where appropriate, providing financial incentives to attract development to targeted districts, centers, and boulevards.

The Project would support the Economic Development Chapter Objective 7.2 to establish a balance of land uses that provides for commercial development to meet the needs of local residents, sustain economic growth, and assure maximum feasible environmental quality through the development of a mix of integrated and supporting land uses within one site, including multi-family residential (both market rate and affordable units, with affordable housing comprising five percent of the total units), hotel, retail, restaurant, and open space uses. The Project would be consistent with Policy 7.2.1 because 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. Based on 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. In doing so, 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. The Project would also be consistent with Policies 7.2.2, 7.2.3, and 7.9.2 to concentrate residential and commercial development in areas best able to support them, including in community/regional centers, near transit stations, and adjacent to mixed-use corridors, by providing 432 residential units, 515 hotel rooms, and 72,091 square feet of restaurants and retail uses in the Downtown Core adjacent to the Metro B/D Lines Pershing Square Station portal and multiple bus routes. The Project would further Objective 7.9, which calls for the provision of a range of housing types to accommodate future population growth, by providing both condominium and apartment types of various sizes, including affordable units. The Project would further support Objectives 7.2.3, 7.9.2, and 7.9, by providing a mix of residential and commercial uses on an underutilized urban infill site that has convenient access to public transit, as well as opportunities for walking and biking, the Project would facilitate a reduction in vehicle trips and VMT (see Section IV.J, Transportation, of this Draft EIR for further discussion). This, along with the 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. The Project would also support the Policies 7.2.5 and 7.6.3 by including community-serving uses at community and regional centers, in transit stations, and along mixed-use corridors.

Lastly, consistent with Objective 7.10, the Project would have a positive economic impact by creating an estimated 535 permanent full-time and part-time jobs and generating significant revenues for the City in the form of sales and transient occupancy taxes from the proposed commercial and hotel uses, respectively. The Project Site is a vacant parcel of land that produces minimal to no positive economic impact for the City in the existing condition. The Project would transform the vacant land into an large mixed-use development that would contributed multiple new revenue streams to the City, including, but not limited to: retail sales and taxes from residents, visitors, and tourist; substantial transit occupancy tax revenues from two hotels that provide a perpetual revenue stream to the City; permanent jobs and permanent residents on the Project Site, which increases direct and indirect spending in the local community; increases in local property tax revenue; and generally facility economic recovery of the City by continuing urban core development and investment despite a national economic downturn. Thus, as discussed in detail in Table 1 in Appendix F of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Economic Development Chapter.

(f) Transportation Chapter

The Project would advance the goals, objectives and policies of the Framework's Transportation Chapter. The Transportation Chapter recognizes the importance of maximizing the efficiency of existing and proposed infrastructure through advanced transportation technology, reducing vehicle trips and VMT, and by encouraging new development near transit centers. The Project exemplifies the type of project envisioned by the Transportation Element. The Project would be a mixed-use project on an urban infill site adjacent to transit within a City-designated TPA and a SCAG-designed HQTA, which would reduce VMT, as discussed in Section IV.J, Transportation, of this Draft EIR. The Metro B/D Lines Pershing Square Station portal is an integrated component of the Project. Additionally, the Project is located less than 1 mile from the 7th Street Metro station, which provides regional connections to Metro's Red, Purple, Blue, and Exposition lines. Further, over ten regional and local bus lines serve the Project Site and offer connections throughout Los Angeles County. Lastly, the Project would be located within walking distance to several local attractions, further encouraging the use of alternative modes of transportation and reducing congestion on the City's roadway network. See the Project consistency analyses of Mobility Plan 2035 and the 2016–2040 RTP/SCS below for further discussion.

(g) Infrastructure and Public Services Chapter

The Project would support the City's policies and objectives of the Infrastructure and Public Services Chapter. The goals, objectives and policies found within this chapter of the Framework Element addresses 13 infrastructure and public service systems, many of which are interrelated. The applicable goals, objectives and policies have been separately

analyzed in the following sections of this Draft EIR: IV.I.1, Public Services—Fire Protection; IV.I.2, Public Services—Police Protection; IV.I.3, Public Services—Schools; IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure; IV.L.2, Utilities and Service Systems—Wastewater; IV.L.3, Utilities and Service Systems—Energy Infrastructure; and the Initial Study, included as Appendix A.1 of this Draft EIR, for Libraries, Parks, Stormwater, Solid Waste, Power, Telecommunication Facilities, Street Lighting, forestry (urban forest). The Project would not conflict with applicable goals, objectives, and policies of the Framework’s Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Mobility Plan 2035

The Project’s consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 in Appendix F of this Draft EIR. Provided below is a general summary of that analysis.

The Project would not conflict with relevant policies of Mobility Plan 2035. In particular, the Project would support Policy 1.6 to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan and work site traffic control plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would also support Policy 2.3 to recognize walking as a component of every trip and ensure high quality pedestrian access to provide a safe and comfortable walking environment by promoting walkability through the Project’s design and pedestrian and streetscape improvements. In addition, the Project would promote Policy 3.1 to recognize all modes of travel by providing adequate and enhanced pedestrian and vehicular access and providing bicycle facilities within a City-designated TPA and SCAG-designated HQTA in close proximity to transit (including the on-site Metro B/D Lines Pershing Square Station portal). The Project would also improve access for alternative transportation modes (such as the Metro rail and bus services integrated with and adjacent to the Project Site) and would provide a designated off-street area for drop-offs and pick-ups on Level 1. The Project would further support Policy 3.3 to promote equitable land use decisions that result in fewer vehicle trips by providing a new mixed-use development that would be consistent with the existing General Plan land use and zoning designations in proximity to jobs (including those that would be offered on-site), destinations, and other neighborhood services in an area that is well-served by transit. Additionally, given the location of the Project Site along and in proximity to major transit corridors and the Metro B/D Lines Pershing Square Station, the Project would provide all residents, guests, employees, and patrons convenient access to transit services in support of Policy 3.4. Therefore, the Project would not conflict

with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035.

(3) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element that were adopted for the purpose of avoiding or mitigating an environmental effect is detailed in Table 3 in Appendix F of this Draft EIR. As discussed therein, the Project would support Objective 1.1 to produce an adequate supply of housing as well as Objective 2.2 to promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit through the development of 180 residential for-sale condominium units and 252 residential apartment units (with affordable housing comprising five percent of the total units), two hotels with food and beverage spaces, retail, restaurant, and open space uses within one site in an area well-served by public transit. The Project would implement smart growth and sustainability by intensifying density on an urban infill site within a City-designated TPA and SCAG-designated HQTAs and in close proximity to public transit options, therefore reducing VMT and associated fuel consumption. The Project would promote sustainable buildings in order to minimize adverse effects on the environment and minimize use of non-renewable resources (Objective 2.3) by incorporating environmentally sustainable building features and construction protocols required by Title 24, the Los Angeles Green Building Code, and CALGreen. These standards would reduce and conserve energy, water usage, and waste, thereby reducing associated greenhouse gas emissions and the impact on natural resources and infrastructure. The Project would also incorporate sustainable design features, including, but not limited to electric vehicle charging stations; material recycling stations; energy-efficient wall insulation and glazing units; WaterSense-labeled 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. Therefore, the Project would not conflict with the applicable objectives and policies set forth in the Housing Element.

(4) Los Angeles General Plan Conservation Element

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site does not include any historical resources or archaeological sites and thus would not affect any such on-site resources. There are properties and monuments adjacent to and in proximity to the Project Site that are considered Historical Cultural Monuments (HCM), particularly the Angels Flight Railway located adjacent to the Project Site. The Project would improve the pedestrian environment and experience next to Angels Flight Railway. The existing condition is a narrow stairway adjacent to Angels Flight Railway bordered by a chain link fence. This area is dilapidated, graffitied and unsightly. The Project would substantially improve the existing condition adjacent to Angels Flight Railway by: (1) providing a public open space plaza with retail uses at grade compared to a fenced and vacant lot; (2) widen the adjacent pedestrian stairway and improve the lighting and safety

along this pathway; (3) integrate overlook terraces where pedestrians can view the Angels Flight Railway; and (4) create new pedestrian linkages from the Angels Flight stairway into several of the Project Site's terraced open spaces. These improvements materially enhance the experience of the Angels Flight Railway while being implemented in a manner that respects and complements the historic status of the funicular as explained in Section IV.B, Cultural Resources. Also as concluded in that section, the Project would not directly and historic properties adjacent to or in the vicinity of the Project Site. With respect to indirect impacts, given the Project Site's location outside the boundary of the Historic Broadway Theater and Commercial District and physical separation from historical resources by large city blocks and thoroughfares, the Project would not detract from or materially alter the setting of the Historic Broadway Theater and Commercial District or otherwise result in a substantial adverse change the integrity of historical resources in the area. Similarly, as discussed in the Section IV.B, Cultural Resources, the Project would not have a significant impact on the historic Angels Flight Railway because it does not physically interfere with the railway, nor does it alter the integrity of the setting in an adverse manner. Lastly, as indicated in Section IV.K., Tribal Cultural Resources, no tribal cultural resources have been recorded on the Project Site, and mitigation would ensure that any Project impacts to unanticipated resources that may be unearthed during Project construction would be less than significant. Therefore, the Project would not conflict with the objective and policy supporting the conservation of cultural and historic resources set forth in the Conservation Element.

(5) Los Angeles General Plan Health and Wellness Element

The Project would be consistent with the applicable goals and objectives of the Health and Wellness Element by generating temporary and permanent jobs, expanding housing opportunities, avoiding displacement of existing housing or populations, promoting healthy living, and integrating healthy building design and construction on a site that is proximate to public transit.

The Project would support the City's Policy 1.7 regarding displacement and health because the Project includes 180 residential for-sale condominium units and 252 residential apartments (including 5 percent of the total for-rent units (13 units) for affordable housing) and, therefore, expands housing opportunities. Further, the Project would not result in the displacement of existing housing or populations as the Project Site is largely improved with unmaintained landscaping and the Metro B/D Lines Pershing Square Station.

The Project would also support the City's Policy 2.2 regarding healthy building design and construction through consistency with LEED Silver Certification standards for new buildings and compliance with the 2016 CALGreen Code, Los Angeles Green Building Code, and Los Angeles Building Code.

The Project would support the City's Policy 2.6 regarding the development of underutilized and vacant lots, including publicly owned spaces, to improve community health and well-being. The Project would revitalize underused CRA/LA-owned property and introduce a mixed-use development that incorporates a variety of open space areas within the Project Site in order to promote walkability and biking and contribute to the creation of a healthy community. The Project includes passive recreational spaces throughout the Project in the form of plazas, gardens, courtyards, and landscaped terraces. The primary open space amenity would be Angels Terrace, located at the center of the Project Site. Angels Terrace would provide trees and landscaping, an approximately 400-square-foot elevated linear water feature (possibly with water-side seating, cascading water, and subtle lighting), shade, and seating to host a wide range of cultural events and performances. Additional outdoor open space areas include the Hill Street Plaza and Upper California Plaza Extension. Hill Street Plaza is located on the Ground Level that includes the Metro B/D Lines Pershing Square Station portal and a new adjacent café. Surrounding open spaces would include gardens, fixed and moveable seating, canopy trees for shade, and durable paving materials. The common open space proposed within the Project Site would include 56,881 square feet of exterior common area and additional interior common area, which would exceed the requirements of the LAMC.

Furthermore, the Project would promote pedestrian activity and safety and walkability through the Project's design and its proposed pedestrian and streetscape improvements. The Project would provide direct connections 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 to California Plaza on the northwestern end of the Project Site would be introduced. In addition, the Project would create multi-modal transit options for Project users by providing ample bicycle parking and improving the streetscape, which would enhance the pedestrian experience. Also, the Project would separate pedestrian circulation from motor vehicle circulation, meet City sight distance requirements and provide pedestrian crossing markings at Project driveways, meet City sidewalk requirements, etc., to ensure pedestrian safety; thus, encouraging healthy options for residents, workers, and visitors in the area to safely walk or cycle to nearby destinations.

Therefore, the Project would be consistent with applicable goals set forth in the Health and Wellness Element.

(6) Conclusion

In summary, the Project would be consistent with applicable elements of the General Plan.

(ii) Central City Community Plan

The proposed land uses are consistent with the Project Site's Regional Center Commercial land use designation and would not require a General Plan Amendment or Zone Change. As discussed in Table 4 in Appendix F of this Draft EIR, the Project would be generally consistent with the objectives and policies that support the goals of the Community Plan. Specifically, the Project would be consistent with Objective 1-2 to locate new housing in a manner that reduces vehicular trips because the Project increases density on a vacant urban infill site in the Downtown Core within a City-designated TPA and SCAG-designated HQTA that is well-served by public transportation, including the on-site Pershing Square Station portal; and would reduce VMT. In addition, the Project would provide housing and job opportunities within a single site which may encourage residential tenants to both live and work within the Project, thus reducing VMT. The Project would also be consistent with Objective 1-3 to foster development that can accommodate a full range of incomes, by providing condominium and apartment units, including affordable units, that range in unit types and sizes. The Project would be consistent with Objective 2-1 to improve the Central City's competitiveness as a location for offices, business, retail, and industry, and with Objective 2-3 to promote land uses that address the needs of visitors to Downtown, by providing new hotel and retail uses in Downtown in close proximity to local and regional destinations (e.g., California Plaza, Los Angeles Convention Center, Grand Central Market, etc.). In addition, the Project would support Objective 2-4 to encourage a mix of uses with an active, 24-hour environment while promoting tourism, specifically with the inclusion of the 515 proposed hotels (including ballrooms and meeting rooms), retail, and restaurant space within close proximity to local and regional destinations, such as California Plaza, Los Angeles Convention Center, the Broad Museum, and the Walt Disney Concert Hall. 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 the City's westside or Beverly Hills. Moreover, the Project would be consistent with Objective 11-3 to provide an internal circulation system that focuses on connecting activity centers, and Objective 11-6 to accommodate pedestrian open space usage in Central City by providing an on-site pedestrian circulation system that connects the proposed uses, including the proposed three levels of publicly accessible open space, to Angels Flight, California Plaza and the Metro B/D Lines Pershing Square Station. The Project would also provide pedestrian connections between Bunker Hill and the Historic Core. Overall, the Project would not conflict with the applicable goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(iii) Downtown Community Plan (DTLA 2040 Plan)

DTLA 2040 Plan is the ongoing update of the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles. The purpose of the DTLA 2040 Plan is to develop and implement a future vision

for Downtown Los Angeles and would include policies, plans and programs that frame the City's long-term priorities. The Project Site is located within the DTLA 2040 Plan's designated "Transit Core."³⁸ Transit Core areas are dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form ranges from Moderate Scale to High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock.³⁹ The Project is consistent with the Transit Core designation because it is a mixed-use development proposed on top of the existing Metro B/D Lines Pershing Square Station, comprising 180 residential for-sale condominium units; 252 residential apartments; two hotels with a combined total of 515 guest rooms, restaurants ballrooms, meeting rooms, and amenities; and 72,091 square feet of retail/restaurant uses. It is reasonably anticipated that the Project would be generally consistent with the DTLA 2040 Plan's Transit Core designation. However, because the DTLA 2040 Plan and its Draft EIR are currently under public review and comment and thus subject to change, a finding of consistency with this unadopted plan is not necessary and would be speculative.

(iv) Los Angeles Municipal Code—Zoning Code

(1) Land Use Location, Type, Size, Height and Density

As previously discussed, the Project Site is zoned C2-4D (Commercial zone, Height District 4 with Development Limitations). The C2 zoning permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. The proposed residential, hotel, retail, commercial, restaurant, and open space uses are all permitted in the C2 zone.

Height District No. 4 within the C2 zone does not impose any height limit and allows a maximum FAR of 13:1. The zoning does contain a "D" limitation that generally restricts the FAR to 6:1 without a Transfer of Floor Area Request (TFAR) process. However, the Bunker Hill Specific Plan expressly provides a 13:1 FAR for the Project Site (without using TFAR or any other planning mechanism) and supersedes the "D" zoning restriction. As discussed in Section II, Project Description, of this Draft EIR, Tower A would have a building height of up to 854 feet and Tower B would have a building height of up to 494 feet. The Project's total floor area of 1,269,150 square feet would result in a total FAR of approximately 13:1, which is consistent with LAMC requirements and the permitted floor

³⁸ *City of Los Angeles, DTLA 2040, Draft General Plan Land Use Designation Map.*

³⁹ *City of Los Angeles, DTLA 2040 Draft EIR, p. 4.10-22.*

area rights provided in the Bunker Hill Specific Plan. Additionally, as previously discussed, the LAMC residential density requirements for the Project Site are superseded by Bunker Hill Specific Plan Section 7.G, which does not limit the maximum number of dwelling units or guestrooms on the Project Site. Hence, the Project would be consistent with the land use types, heights, and density permitted on the Project Site.

The Project would include the sale/dispensing of alcoholic beverages and live entertainment/dancing associated with the proposed hotel and/or restaurant uses. Such activities require a CUP. Pursuant to LAMC Section 12.24.W.1, the Applicant is requesting a Master CUP to permit the sale/dispensing of alcoholic beverages. The Applicant is also requesting a CUP for live entertainment/dancing pursuant to LAMC Section 12.24.W.18. These uses would be permitted upon approval of the requested CUPs and thereby consistent with the applicable code and zoning.

(2) Open Space and Landscaping

The LAMC requires usable open space at a rate of 100 square feet for each dwelling unit with less than three habitable rooms, 125 square feet for each dwelling unit with three habitable rooms, and 175 square feet for each dwelling unit with more than three habitable rooms.⁴⁰ Accordingly, the Project is required to provide a total of 51,625 square feet for the residential floor area. The Project would include approximately 56,881 square feet of common open space, and thus would comply with the LAMC requirements for open space.

As shown in Figures II-15 through II-17 in Section II, Project Description, of this Draft EIR, the Project would incorporate numerous common and private open space and recreational amenities. 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 Project would also include a 5,268 square foot private roof deck that would be accessible to Project residents. Thus, the total common open space provided within the Project would include approximately 56,881 square feet, in accordance with the requirements of the LAMC and Specific Plan. Open spaces would be ADA accessible, with clear site lines. 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. Additionally, direct connections would be made to California Plaza on the northwest end of the Project Site in the form of an on-site landscaped terrace that

⁴⁰ LAMC Section 12.21.G. Per LAMC Section 12.03, for the purpose of applying the open space requirement, a kitchen shall not be considered a habitable room.

seamlessly transitions to the Upper California Plaza. Open spaces would include gardens, fixed and moveable seating, canopy trees for shade, and durable paving materials. Plant species utilized in the Project would consist of both native and adapted plants.

The Project would provide 56,881 square feet of open space. LAMC Section 12.21 G requires usable open space at a rate of 100 square feet for each dwelling unit with less than three habitable rooms, 125 square feet for each dwelling unit with three habitable rooms, and 175 square feet for each dwelling unit with more than three habitable rooms. The Project would include 219 studio and 1 bedroom, 151 two bedroom, and 62 three bedroom and penthouse units. Accordingly, as shown in Table IV.F-1 on page IV.F-42, the Project is required to provide a total of 51,625 square feet for the residential floor area. The Project would include approximately 56,881 square feet of common open space, and thus would comply with the LAMC requirements for open space.

(3) Parking

The parking supply requirements for the Project Site are governed by the Bunker Hill Specific Plan. The Specific Plan requires vehicle parking at a rate of 0.25 space for each dwelling unit with less than two habitable rooms, 0.5 space for each dwelling unit with two or more habitable rooms, and no vehicle parking for non-residential uses, such as hotel and commercial retail and restaurant uses. As described in Section II, Project Description, of this Draft EIR, and shown in Table IV.F-2 on page IV.F-43, the Project is required to provide 216 vehicle parking spaces and would provide 750 vehicle parking spaces within a three-level subterranean parking structure. In addition, 30 percent of the provided parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of the provided parking spaces will have electric vehicle (EV) charging stations in accordance with Code requirements.

The Project also would provide the Code-required number of bicycle parking spaces for the Project in accordance with the standards set forth in LAMC Sections 12.21.16(h) and 11.5.7.C. As described in Section II, Project Description, of this Draft EIR, and shown in Table IV.F-3 on page IV.F-44, the Project would provide the required 105 short-term bicycle parking spaces and 270 long-term bicycle parking spaces. Therefore, the project complies with the City bicycle parking requirements.

(4) Conclusion

In summary, the Project would be consistent with applicable provisions of the LAMC.

**Table IV.F-1
Open Space Requirement**

Dwelling	Studio	1-Bedroom	2-Bedroom	3-Bedroom	Penthouse	Total
Condominium	0 du	51 du	91 du	29 du	9 du	180 du
Apartment	42 du	126 du	60 du	24 du	0 du	252 du
Total	42 du	177 du	151 du	53 du	9 du	432 du
	Dwelling Units (per LAMC 12.03)					
	Studio + 1-Bedroom	2-Bedroom	3-Bedroom + Penthouse	Total		
Open Space sf Required (per LAMC 12.21 G)	219 du x 100 sf	151 du x 125 sf	62 du x 175 sf			
Total	21,900 sf	18,875 sf	10,850 sf	51,625 sf		
<hr/> <i>du = dwelling units</i> <i>sf = square feet</i> <i>Source: Handel Architects, 2020.</i>						

(v) Bunker Hill Specific Plan

The Project's consistency with the applicable purposes of the Specific Plan is summarized below and analyzed more fully in Table 5 in Appendix F of this Draft EIR. As indicated therein, the Project would be consistent with the Specific Plan purposes. The applicable regulations of the Specific Plan are fully analyzed herein, and thus are excluded from Table 5 in Appendix F of this Draft EIR.

Section 2 of the Specific Plan provides its primary purposes. The Project is consistent with these purposes for the following reasons. One, the Project is consistent with and implements the Community Plan land uses programmed for the Project Site. Two, the Project would redevelop a vacant urban infill site with a mixed-use development that would provide a range of housing opportunities, two hotels, and commercial, retail, restaurant and open space uses that promote an enlivened 24-hour downtown environment. Three, the Project would reinforce and enhance the districts identity as the cultural center for the region by including hotels that could serve tourist and visitors to the major downtown attractions such as the museums, Los Angeles Convention Center, Staples Center, civic venues and the forthcoming 2028 Olympic and Paralympic Games. The Project also includes space zoned for commercial uses such that additional cultural attractions could locate on the Project Site as tenants. Four, the Project would substantially expand the economic base of the City by creating hundreds of temporary and permanent jobs and would create a new source of revenue for the City through retail sales taxes and hotel transient occupancy taxes. Five, the Project would implement design

**Table IV.F-2
Vehicular Parking Calculations per Bunker Hill Specific Plan Section 10.A.3**

Use	Parking Ratio	Required	Provided
Residential (less than 2 habitable rooms)	0.25 per du	0 per du	0 per du
Residential (2 habitable rooms or more)	0.5 per du	216 per du	640 per du
Hotel	0 per du	0 per du	85 per du
Non-Residential	0 per du	0 per du	25 per du
Total		216 per du	750 per du
<hr/> <i>du = dwelling units</i> <i>Source: Handel Architects, 2020.</i>			

regulations and maintain a high-quality built form and a compatible infill development that enlivens the streets and public spaces. The Project has completed the City's urban design review process with the Urban Design Studio. It also transforms a vacant and publicly inaccessible site into a vibrant redevelopment with ample landscaping, public plazas, and activated land uses that will enliven the surrounding streets and provide substantial new public spaces. The Project's approximately 56,881 square feet of exterior common open space, much of which would be publicly accessible, and the multiple pedestrian connections through the Project Site from Bunker Hill to the Historic Core, and between Angels Flight, California Plaza, the Pershing Square Metro Station, and the proposed on-site pedestrian plazas, would advance the Specific Plan's purpose to create a linked network of open spaces and pathways. Six, the Project would also support the expansion of the regional transit network because it contains a mix of land uses (residential, hotel, commercial, retail, restaurant, plazas, terraces, and activated open spaces integrated with an existing Metro portal that would further high levels of transit use). Seven, the Project would create a transit-friendly environment because it integrates numerous pedestrian linkages across the Project Site, incorporates several ground floor active uses, and enhances the pedestrian and rider experience for the existing Metro facilities on and adjacent to the Project Site. Eight, the Project also implements the downtown streets standards and applicable requirements of the Mobility Element. Nine, the Project improves the surrounding business environment (both in Bunker Hill and the Historic Core) by redeveloping the vacant site into a landscaped, and dynamic and attractive public realm, that links the surrounding business environments together.

(1) Land Use Regulations

Section 7 of the Specific Plan sets forth the Land Use Regulations and Designation of Subareas, including regulations relating to FAR, permitted uses, setbacks, open space,

**Table IV.F-3
Bicycle Parking Calculations per LAMC 12.21.A.16**

Use	Bicycle Parking Ratio	Required (Minimum 2)	Provided
Retail/Restaurant/ Commercial	1 per 2,000 sf for Short-Term and Long-Term	Short-Term: 36 Long-Term: 36	Short-Term: 36 Long-Term: 36
Hotel	1 per 10 guest rooms for Short-Term and Long-Term	Short-Term: 51 Long-Term: 51	Short-Term: 51 Long-Term: 51
Residential	<u>Short-Term</u> 1–25 du: 1 per 10 du 26–100 du: 1 per 15 du 101–200 du: 1 per 20 du 201+ du: 1 per 40 du <u>Long-Term</u> 1–25 du: 1 per du 26–100 du: 1 per 1.5 du 101–200 du: 1 per 2 du 201+ du: 1 per 4 du	Short-Term: 18 Long-Term: 183	Short-Term: 18 Long-Term: 183
Total		Short-Term: 105 Long-Term: 270	Short-Term: 105 Long-Term: 270
<hr/> <i>du = dwelling unit</i> <i>Source: Handel Architects, 2020.</i>			

and density. As discussed above, the maximum permitted FAR for the Project Site is approximately 13:1, which authorizes up to 1,390,900 for Parcel Y1, and thereby 1,269,359 square feet of new floor area for the Project Site. The Project would include up to 1,269,150 square feet of new floor area that would comply with the Specific Plan FAR allowances for the Project Site. With respect to maximum residential and hotel density, Section 7.G of the Specific Plan states that the maximum number of dwelling units or guestrooms shall not be limited by the lot area provisions of the LAMC. Therefore, the Project's residential and hotel component would comply with the density requirements in the Specific Plan.

Section 7.C of the Specific Plan authorizes those uses permitted by the Project Site's underlying C2 zoning designation as well as those uses specifically authorized by the Specific Plan, including health clubs, outdoor eating areas, hotels, transit stations and related facilities and uses, and entertainment and commercial recreation uses. The Project would include a diverse mix of residential, hotel, commercial, restaurant, retail and open space uses. These uses are either permitted under the Specific Plan or the underlying C2 zoning.

Section 7.E of the Specific Plan provides that no yard requirements shall apply except as required by the applicable urban design standards, which is further analyzed below. In addition, where required by the Downtown Street Standards, a Project shall be required to provide a sidewalk easement. The Mobility Plan 2035, which incorporates the Downtown Street Standards, establishes the applicable street standards for the segments of Olive, 4th, and Hill Streets that abut the Project Site. All three segments are designated Modified Avenue II by the Mobility Plan 2035, which requires a 3-foot-wide average sidewalk easement. In conformance with the Mobility Plan 2035, the Project provides the 3-foot-wide average sidewalk easements on Olive, 4th, and Hill Streets to improve pedestrian travel throughout the area. The Project buildings would be built to the property line, and no setback would be provided as permitted by the Specific Plan.

Section 7.F of the Specific Plan applies additional open space requirements to projects that redevelop an entire subarea or block. Section 7.F.1 of the Specific Plan indicates that a project that develops the entire subarea should include a pedestrian plaza that is: (a) a minimum of 5,000 square feet; (b) located on the ground level with direct pedestrian connection to the adjacent street; (c) unenclosed by any wall, fence gate, or other obstruction; (d) lined with ground floor spaces design for retail, especially restaurants that include outdoor dining, and/or cultural uses, along at least 20 percent of its building frontage; (e) at least 40 percent landscaped, including usable lawn or lawn alternatives part of the landscaping treatment; and (f) includes at least one gathering place with a fountain or other focal element. Section 7.F.3 of the Specific Plan allows for a 50 percent reduction in the total amount of open space required per LAMC if a project includes open space that meets all of the requirements specified in Section 7.F.4.1.a through f. The Project, which is located in Subarea Y1 of the Specific Plan, would not develop the entire subarea for two reasons. First, because a portion of it is already occupied and developed with the existing Metro B/D Lines Pershing Square Station portal. Second, because a portion of Subarea Y1 is separately owned by the Angels Flight Railway Foundation and already occupied and developed with the historic Angels Flight funicular. Pursuant to Section 7.F.2 of the Specific Plan, projects that do not develop the entire subarea:

[S]hall incorporate usable open space that is visible and accessible from the sidewalk and that includes pedestrian amenities such as focal points, gathering places, and landscaped areas, for the purpose of enhancing the quality of life for residents, businesses and visitors. Projects shall provide open space at a rate of 1 square foot per 100 square foot of nonresidential floor area. The nonresidential open space requirement need not exceed 5,000 square feet of open space. The requirements of LAMC Section 12.21 G shall also apply, except that they may be reduced pursuant to [Section 7.F.3].

The Project would include 56,881 square feet of common open space, including two spacious public landscaped plazas. The Hill Street Plaza would be at street level along Hill Street. Passengers exiting the Pershing Square Station would arrive at the Hill Street Plaza, which would provide seating areas, landscaped areas, and direct access to ground floor amenities. Angels Terrace would be the Project's focal point. This public terrace would include a water feature, landscaped areas, pedestrian paseos, and seating areas. Angels Terrace would be surrounded by active retail and restaurant uses. The Upper California Plaza Extension would include enhanced hardscape and landscape open space that seamlessly connects to the off-site California Plaza open space area. The Terrace and Olive Street Plaza would provide functional open space that connects the new landscaped staircase parallel to the Angels Flight Railway to Lower California Plaza and Olive Street, respectively. The Project would satisfy the Section 7.F.2 requirements of the Specific Plan as well as the LAMC Section 12.21.G residential open space requirements and thereby be consistent with the Specific Plan and LAMC. No reduction in the LAMC open space requirement, as permitted under the Specific Plan, is sought as part of the Project.

(2) Urban Design Regulations

Section 8 of the Specific Plan sets forth the Urban Design Regulations, including regulations relating to setbacks, ground floor treatment, and massing and street wall. Section 8.A requires compliance with the Downtown Design Guide. The Project's consistency with the Downtown Design Guide is provided later in this section. Section 8.B.1 regulates setbacks within the Specific Plan area. No setbacks are required on retail streets where the ground floor contains retail uses. Olive Street, 4th Street, and Hill Street are all designated as Retail Streets per Table 2 in the Specific Plan. On Hill Street, the Project would include street level retail storefronts oriented toward Hill Street within Tower A, as well as a standalone café fronting Hill Street next to the Metro portal. Therefore, no setback is required on Hill Street. The 4th Street frontage would accommodate some retail and activate the pedestrian realm by using clear glass with articulated mullions along the street wall. 4th Street climbs uphill between Hill Street and Olive Street. At the lowest elevation of 4th Street (i.e., Level PB1), the Project would be improved with the Metro portal and arrival plaza, and as 4th Street inclines the Project would include a retail space at Level 01 with direct access from 4th Street, and additional retail space visible from 4th Street and accessible at the corner of 4th and Olive Streets via the North Paseo. Therefore, no setback is required on 4th Street. On Olive Street, retail space would be visible from the corner of 4th and Olive Streets and accessible via the North Paseo which opens up to Olive and 4th Streets at Level 03. Due to the unique topography of the Project Site, the Project's back of house service, loading and trash facilities would be sited on Olive Street. Though the adjacent use on Olive Street would largely comprise of back of house facilities, no setback is required on Olive Street because: (1) there is visible and accessible retail space at the corner of Olive and 4th Streets; and (2) Table 1 in Section 8.B.1 of the Specific Plan does not prescribe a setback requirement for such back of house uses. The

Project buildings would be built to the property line, and no setback would be provided as permitted by the Specific Plan.

Section 8.B.2 of the Specific Plan regulates ground floor treatment on Retail Streets. On Olive Street, the Specific Plan requires that 50 percent of the street frontage be designed to accommodate retail, professional office or live-work uses. On Hill Street and 4th Street, the Specific Plan requires that 75 percent of the street frontage be designed to accommodate retail, professional office or live-work uses. For the purposes of complying with the Specific Plan and the associated Design Guidelines, the street frontage shall be calculated excluding any frontage utilized for permitted vehicular access driveways or for access to fixed rail transit stations. Further, the required ground floor space may be located along a courtyard, plaza, or other open space that is visible and accessible from the sidewalk, provided the retail frontage is visible from the sidewalk. The Project is designed to accommodate active ground floor retail uses for 92 percent of the Hill Street frontage, 32 percent of the 4th Street frontage, and 11 percent of the Olive Street frontage. As proposed, the Project will not fully comply with the Specific Plan requirements on 4th and Olive Streets. As such, pursuant to Section 6.C of the Specific Plan, the Project entitlements include a request for Director's Determination for Alternative Design to provide relief from the strict application of the Specific Plan requirements.

This is due, in part, to the location of the Pershing Square Station portal on the corner of Hill and 4th Streets, which occupies a portion of both streets' frontage space. The sloping topography along 4th Street also constrains the Project's ability to meet the 75 percent requirement at the street level. Nevertheless, the hotel lobby and elevator lobby, which is visible along 4th Street, engages the pedestrian realm by using clear glass with articulated mullions. Though these uses would not neatly qualify as retail, professional office or live-work use under the Specific Plan, the pedestrian realm is nonetheless activated by the effective use of transparent materials along the street wall. In addition, as previously described above, retail space would be visible at the corner of Olive and 4th Streets and accessible via the North Paseo. The paseo is designed to pull pedestrians in from the street corner into the Project Site's Angels Terrace which is lined with retail and restaurant uses. This would advance the Specific Plan's purpose to create a linked network of open spaces and pathways. In addition, the driveways needed to accommodate the vehicular traffic of residents, visitors, and businesses on the Project Site would also reduce the street frontage available for retail uses, especially on Olive Street, where the street's location at the top of the sloping site makes it the most feasible place to site driveways to the subterranean parking structure and back of house facilities, such as service loading and trash. On balance, placing the driveway and loading access on Olive Street is preferable to locating it on 4th or Hill Streets as Olive is a minor street compared to the busier 4th and Hill roadways. As such, pursuant to Section 6.C of the Specific Plan, the Project entitlements include a request for Director's Determination for Alternative Design to provide relief from the strict application of the Specific Plan requirements. For

these reasons, the Project would not conflict with the overall intent of Section 8.B.2 of the Specific Plan.

In order to define the public realm, Section 8.B.3 of the Specific Plan sets forth regulations for massing and street walls. For projects located on Retail Streets, 80 percent of the project frontage must be lined with a building street wall, with a minimum street wall height of 25 feet. Frontage along a courtyard, plaza, or other open space that is open to a street on up to two sides and lined with ground floor uses may be counted as part of the street wall. Additionally, a portal for a Fixed Rail Transit Station may also be counted as street wall. On Olive Street, 80.5 percent of the frontage would include a building street wall of 25 feet or higher. On 4th Street, 95.5 percent of the frontage would include a building street wall of 25 feet or higher. Frontage along the Hill Street plaza at the corner of 4th and Hill Street may be counted as part of the street wall per the Specific Plan. On Hill Street, 100 percent of the frontage would include a building street wall comprising the Hill Street Plaza from the corner of 4th Street up to the retail storefronts in Tower A which would have a street wall height of 25 feet or higher. Therefore, the Project would comply with the Specific Plan's street wall requirements.

(3) Pedestrian Plan Regulations

Section 9 of the Specific Plan establishes a plan for an integrated network of pedestrian linkages throughout the Specific Plan area. As shown in Map C, Pedestrian Plan, of the Specific Plan, existing and future pedestrian connections are designated on the Project Site along Olive Street and diagonally through the Project Site from the corner of Hill Street and 4th Street up to the Angels Flight station above Olive Street. The Specific Plan requires pedestrian walkways be constructed at or near the approximate locations designated in the Specific Plan. Pedestrian walkways must be constructed of a hard, durable surface, shall be 15 feet wide at a minimum and 20 feet wide on average, and must be designed as wholly contiguous and completely accessible to the public upon full implementation of a linkage between two public rights-of-way. The Specific Plan also provides that, in lieu of providing the required pedestrian walkways, a project may conduct a transportation impact analysis to document potential impacts and provide alternative mitigation for pedestrian circulation.

Pedestrian connectivity is a priority in the Project's design. In the existing condition, the Project Site provides minimal pedestrian connectivity because it is vacant and closed to the public, with the limited exceptions of pedestrian access to the Metro portal and the narrow stairway adjacent to Angels Flight. The Project would substantially improve the pedestrian connectivity on the Project Site in several ways.

The Project would include and improve the three pedestrian connections shown on Map C in the Specific Plan as follows. First, the Project would replace the existing stairway

along Angels Flight, connecting pedestrians from Hill Street to Olive Street and California Plaza. The existing stairway is approximately 6 feet wide. The Project would construct a much wider stairway that has an approximately 30-foot-wide entrance near Hill Street, is at least 15-foot wide along its alignment, and has adjacent pedestrian plazas and viewing decks. Second, the Project would provide pedestrian access from the corner of Hill Street and 4th Street diagonally across the Project Site as shown in Map C. This diagonal route through the Project Site is not merely a pedestrian walkway. Instead, it is a series of open space plazas (including the Hill Street Plaza, Angels Terrace, and Upper Cal Plaza Terrace) connected by walkways, elevators, and escalators. These plazas and walkways connect each terrace and provide access through the Project Site to Olive Street and California Plaza. ADA-accessible access to all areas of the Project would be provided via a series of elevators and ramps. Third, Map C identifies a pedestrian walkway along Olive Street that aligns with the current sidewalk. The Project would replace the sidewalk along Olive Street with a new and wider sidewalk that complies with the downtown street standards. Additionally, although not identified on Map C, the Project includes another landscaped pedestrian paseo—the North Paseo—at the Angels Terrace level that would provide pedestrian access from the corner of Olive Street and 4th Street into the Angels Terrace and the other internal features of the Project Site. Moreover, the Project conducted a transportation impact analysis (e.g., Section 4C of the Transportation Assessment included as Appendix J.1 of this Draft EIR) that concluded there would be no impacts to pedestrian circulation, and instead, that the Project would substantially improve pedestrian connectivity and have beneficial effects compared to the existing conditions.

Based on the foregoing, the Project would comply with the Pedestrian Plan requirements of the Specific Plan.

(4) Transportation and Parking Regulations

Section 10 of the Specific Plan contains transportation and parking regulations applicable to projects within the Specific Plan area. The regulations in the Specific Plan supersede the transportation and parking requirements set forth in the LAMC. Because the Project Site is located within 1,500 feet of a fixed rail transit station, there is no minimum required parking for non-residential uses. For residential uses, the Specific Plan requires that the Project include 0.25 space for each dwelling unit with less than two habitable rooms and 0.5 space for dwelling units with two or more habitable rooms. Based on these requirements, a total of 216 parking spaces are required.⁴¹ The Project would include up to 750 parking spaces (including EV and EVSE parking spaces, as discussed above) in three

⁴¹ *Calculated as follows: 0.5 space per residential unit multiplied by 432 proposed residential units = 216 vehicle parking spaces. No additional parking is required for the Project's other proposed uses.*

subterranean levels. Therefore, the Project includes sufficient parking spaces to satisfy the Specific Plan requirements.

(5) Conclusion

In summary, with approval of the requested discretionary actions outlined above, the Project would be consistent with applicable provisions of the Specific Plan.

(vi) Downtown Design Guide: Urban Design Standards and Guidelines

The Project's consistency with the standards and guidelines set forth in the Downtown Design Guide is analyzed in Table 6 in Appendix F of this Draft EIR. The Downtown Design Guide encourages the development of Downtown Los Angeles as a more sustainable community with an emphasis on walkability and the making of great streets, districts, and neighborhoods. The focus of the Downtown Design Guide is the relationship of the buildings to the street, including sidewalk treatment, the character of the building as it adjoins the sidewalk, and connections to transit.

As discussed in Table 6 in Appendix F of this Draft EIR, the Project would not conflict with applicable guidance from the Downtown Design Guide. The Project's contemporary architecture would complement and enhance the surrounding developments and provide a seamless transition between the high-rise buildings atop Bunker Hill and the mid-rise buildings to the east in the Historic Core. Additionally, the Project prioritizes pedestrians and would include streetscape improvements tailored to encourage pedestrian activity, such as landscaped street frontages and street furniture, and a series of pedestrian pathways and landscaped paseos that would connect Hill Street to Olive Street and California Plaza.

Based on the above and as presented in Table 6 in Appendix F of this Draft EIR, the Project would not conflict with the standards and guidelines established by the Downtown Design Guide.

(vii) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not strict regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all guidelines are appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines.

Guideline 1: Promote a Safe, Comfortable and Accessible Pedestrian Experience for All.

The Project would implement several site planning best practices in support of Guideline 1, including the following:

- Ensure that pedestrian pathways are accessible, clear, prominent and intuitive to navigate.
- Prioritize pedestrian circulation at the street level.
- Provide direct access to the surrounding neighborhood and amenities.
- Encourage transit-friendly design and building orientation that promotes pedestrian activity and provides convenient access to transit for pedestrians and persons with disabilities.

The Project would prioritize pedestrian circulation by providing a variety of pedestrian connections within the Project Site. One of the key elements of the Project's design is the terraced podium comprising landscaped open space plazas and terraces at Level PB1 (Hill Street Plaza), Level 03 (Angels Terrace), Level 05 (Access to Olive Street), Level 06 (Access to Lower California Plaza), and Level 07 (Upper California Plaza Terrace Extension). The Hill Street Plaza would improve the arrival experience at the Metro B/D Lines Pershing Square Station portal with landscape and hardscape improvements, create an active pedestrian environment along the Hill Street frontage, and provide functional pedestrian connections to and from California Plaza and the adjacent office buildings and streets. The Project would prioritize pedestrian circulation at the street level and provide direct access to the surrounding neighborhood and amenities by enhancing pedestrian access along the perimeter and throughout the Project Site, including via new pedestrian walkways from 4th Street, Olive Street, and Hill Street. In addition, the main pedestrian connection would be the North Paseo, which would extend from the corner of 4th Street and Olive Street to the new landscaped staircase adjacent to Angels Flight. Lastly, while the grade of the Project Site has an approximately 100-foot vertical distance between the Metro portal and Upper California Plaza, the Project solves for this unique topography by incorporating stepped exterior terraces between the towers, and pedestrian circulation through the Project Site and along Angels Flight, all of which include strategically sited elevators to enable pedestrians and persons with disabilities to traverse the Project Site with ease and access the Metro portal at the lowest elevation of the Project Site. For that reason, the Project encourages transit-friendly design and building orientation that promotes pedestrian activity and provides convenient access to transit for pedestrians and persons with disabilities. Therefore, the Project would not conflict with this guideline of the Citywide Design Guidelines.

Guideline 2: Carefully Incorporate Vehicular Access Such That It Does Not Discourage and/or Inhibit the Pedestrian Experience.

The Project would implement several site planning and right-of-way best practices in furtherance of this guideline, including the following:

- Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.
- Minimize both the number of driveway entrances and overall driveway widths.
- Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.
- Orient vehicular access as far from street intersections as possible.
- Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.
- Utilize alleys and/or side streets for vehicular access where appropriate in lieu of interrupting a primary street with driveway entrances.

Parking for the Project would be provided within a parking garage of up to three subterranean levels. The Project would minimize the number of driveway entrances on the Project Site by providing only two driveway access points – one on Olive Street and one on 4th Street. The Olive Street vehicle access would be the primary site access for users of the parking garage and would include a direct ramp down to the parking levels. The 4th Street driveway would provide access to the lower porte cochère. In addition to entrances to the hotel lobbies, the porte cochère would provide access to the apartment and condominium lobbies. All parking via the porte cochère would be valet, and the porte cochère includes a separate ramp to the parking garage. The driveways are also oriented toward the rear and side of the building, Olive Street and 4th Street, respectively, to prioritize pedestrian access along Hill Street. Utilizing the secondary streets—Olive and 4th Streets—in this case, for vehicle access avoids interrupting Hill Street with driveway entrances. Furthermore, the driveways are situated as far from the street intersections as possible so that the corner of 4th and Olive Streets, as well as 4th and Hill Streets remain activated and oriented toward the pedestrian realm. From the corner of 4th and Olive, pedestrians are drawn into the Project Site through the North Paseo which opens to restaurant and retail storefronts and the Project's primary open space area—the Angels Terrace. The corner also incorporates clear glass with articulated mullions to promote transparency and visibility between the Project and the pedestrian realm. The corner of 4th

and Hill is improved with the existing Metro portal and would be further activated at the pedestrian level with new landscaping, seating areas, and a standalone café. The Project would also ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by providing a separate and dedicated loading dock and entrance along Olive Street beneath the California Plaza overbuild. Additionally, access for trash pickup would be provided adjacent to the loading dock. Lastly, the Project would locate the drop-off/pick-up areas within the porte cochere on-site, as described above, rather than curbside between the building entrances and the adjoining sidewalks. Therefore, the Project would not conflict with this guideline of the Citywide Design Guidelines.

Guideline 3: Design Projects to Actively Engage With Streets and Public Space and Maintain Human Scale.

The Project would implement several building design best practices to support this guideline, including the following:

- Locate active ground floor uses along primary street frontages.
- Design and orient buildings to provide users with direct visual and physical connections to the abutting public rights-of-way.
- Locate windows, balconies and courtyards to provide views onto sidewalks and gathering spaces.
- Avoid long blank walls where pedestrian activity is anticipated.
- Locate the majority of code-required open space at the ground level in a manner that is equally accessible to all residential units to promote safety and the use of outdoor areas. In mid- and high-rise buildings, podiums between buildings and rooftop areas can be used as common areas.
- Ensure that ground floor uses maintain a high degree of transparency and maximize a visual connection to the street by providing clear and unobstructed windows, free of reflective glass coatings, exterior mounted gates, or security grills.

The Project would improve the streetscape experience through a design that is characterized by a strong street and pedestrian orientation. The Project would improve the arrival plaza at the Metro B/D Lines Pershing Square Station portal, which would enhance the experience of the Angel's Flight funicular, create an active pedestrian environment along the street frontages, and provide functional pedestrian connections to and from California Plaza and the adjacent office buildings and streets. On Hill Street, the Project would locate a standalone café near the Metro portal and street level storefronts in Tower A. The Project design incorporates clear glass with articulated mullions along the street

wall frontages to maximize transparency and overall visibility between the Project and the pedestrian realm. This design consideration avoids long blank walls where pedestrian activity is anticipated. Similarly, the North Paseo which draws pedestrians across the Project Site from the corner of 4th and Olive Streets to the Angels Flight staircase would be lined with restaurant and retail storefronts and open up to the Project's primary open space—the Angels Terrace, which will include seating areas, trees, and water features. To further improve the streetscape experience by reducing visual clutter, the lower tower located along 4th Street (Tower B), would be set back from the corner of Hill Street and would feature a height and scale in between those of the lower neighboring buildings across 4th Street and the taller scale of the planned new development across Hill Street. In addition, at the street level, retail storefronts and restaurants would be set back from the Hill Street sidewalk near the on-site Metro portal. This would open up views to the portal for those walking along Hill Street. Lastly, the Project offers public and private balconies and open space areas that offer unique views onto the sidewalks and gathering spaces, including the hotel and residential private balconies, the Angels Terrace, and the stairway along Angels Flight which offers stepped terraces where pedestrians can pause to take in views of the historic funicular. Therefore, the Project would not conflict with this guideline of the Citywide Design Guidelines.

Guideline 4: Organize and Shape Projects to Recognize and Respect Surrounding Context.

The Project would implement several site planning and building design best practices to support this guideline, including the following:

- Lay out the site to ensure that access and building entrances are clearly legible.
- Locate and shape buildings to minimize disrupting users of neighboring buildings.
- Site and shape buildings to maintain public views of important structures, places and natural landscape features.
- Place and shape outdoor space to respond to, and/or connect with, nearby existing parks and open space areas.
- Use exterior surface materials that will reduce the incidence and appearance of graffiti.
- Modulate building massing vertically and horizontally to a scale compatible to its context.

The Project is organized and shaped to recognize and respect the surrounding context. On Hill Street, the Project activates the street with the Hill Street Plaza and

pedestrian oriented retail storefronts and standalone café. On 4th Street, the Project incorporates clear glass with articulated mullions along the street wall to engage the pedestrian realm. The use of glass also reduces the incidence and appearance of graffiti consistent with best practices of this guideline. On the west, the Project provides multiple pedestrian connections to seamlessly transition to the existing off-site improvements at varying elevation, including the covered portion of Olive Street and the Lower and Upper California Plaza. The Project provides a network of open space areas and pathways to facilitate accessible, clear, and prominent pedestrian circulation along this western interface. And lastly on the north, the Project design responds to and connects with the historic Angels Flight funicular with a widened stairway and terraced landings that embrace the urban theater that Angels Flight provides. In addition, the Tower A meeting and conference areas on the north incorporate clear glass to promote the unique urbanistic dialogue that would naturally occur between the Project and the off-site Angels Flight. These Project design considerations on the north enhance the public views of the iconic Angels Flight Railway. Lastly, the Project modulates building massing vertically and horizontally to a scale compatible to its context by blending together elements of the existing Bunker Hill and Historic Core neighborhoods. Specifically, the Project places tall tower components on the Project Site (which reflect the high-rise buildings in adjacent Bunker Hill) while also including grade-level open spaces, terraces and retail uses in the lower podium levels of the structures (which reflects the lower-rise uses in the Historic Core) to create a functional linkage between the two neighborhoods. For these reasons, the Project would not conflict with this guideline of the Citywide Design Guidelines.

Guideline 5: Express a Clear and Coherent Architectural Idea.

The Project would implement several site planning and building design best practices to support this guideline, including the following:

- Shape building design to respond to the setbacks, fenestration patterns and important horizontal datums of adjacent structures.
- Reinforce the overall design concept through the selection of both plants and hardscape elements.
- Select materials and develop façade details that consider the views of the building from all sides.

The Project design has a comprehensive concept experienced through scale, proportion, enclosure, and compositional clarity for the following reasons. First, the Project design responds to the setbacks and important horizontal datums of adjacent structures as discussed under Guideline 4 above. The Project incorporates pedestrian connections to promote circulation off-site to neighboring properties and streets. In addition, the Project orients the tower components toward Bunker Hill which is largely improved with high-rise

buildings and places the street-level, pedestrian-oriented open spaces, terraces and retail uses in the lower podium levels to reflect the lower-rise uses in the Historic Core. Second, the project reinforces the overall design concept through the stepped exterior landscaped terraces between the towers. The plant and hardscape elements of the terraced podium activate the Project at the pedestrian scale and culminate in two large open space areas – the Angels Terrace and the Hill Street Plaza. Third, as previously described, the Project utilizes clear glass with articulated mullions at the street level and within the podium to activate views from all sides of the Project. The palette and color scheme for the Project would consist of light and warm tones carried through the podium and tower components of the Project. Lastly, the Project was submitted for, and has completed, design review with the Urban Design Studio as discussed previously above. For these reasons, the Project would not conflict with this guideline of the Citywide Design Guidelines.

Guideline 6: Provide Amenities That Support Community Building and Provide an Inviting Comfortable User Experience.

The Project would implement several site planning best practices to support this guideline, including the following:

- Create diverse and adaptable community gathering spaces that enhance opportunities for healthy activities such as fitness, play, cooking and gardening to engage participants of all ages.
- Incorporate shaded open space such as plazas, courtyards, pocket parks, and terraces in large scale buildings.
- Design open areas to be easily accessible.

The Project would encourage connections with a variety of transit modes and enhance the immediate environment with open space and retail/restaurant amenities accessible to the public. The Project includes a variety of common and private open space amenities within the Project Site, totaling 56,881 square feet. The Project would provide common open space in the form of plazas (Hill Street Plaza and Angels Terrace), gardens, courtyards, and landscaped terraces which would be publicly accessible during daytime hours. Specifically, the Project would provide 34,215 square feet of public open space, the Hill Street Plaza would be approximately 17,368 square feet, and Angels Terrace would be approximately 16,847 square feet. The Project would also offer three additional public open space areas throughout the Project totaling approximately 17,398 square feet, and a private open space area including a 5,268-square-foot apartment roofdeck. Interior common areas would include residential amenities such as fitness areas, game rooms, lounges, and meeting rooms. The open spaces areas are easily accessible and designed at the pedestrian scale by linking the open spaces with pedestrian pathways that are accessible, clear, prominent and intuitive to navigate. Overall, the Project includes

approximately 56,881 square feet of common open space in excess of LAMC requirements and would not conflict with this guideline of the Citywide Design Guidelines.

(viii) City of Los Angeles Walkability Checklist

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

(1) Sidewalks

The sidewalks objective calls for facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. Recommended implementation strategies that would be incorporated into the Project include: (1) creating a continuous and predominantly straight sidewalk and open space; (2) creating a buffer between pedestrians and moving vehicles by the use of landscaping by installing perimeter landscaping; (3) providing adequate sidewalk widths; and (4) incorporating closely planted shade-producing street trees within the Project Site. Therefore, the Project would not conflict with design strategies related to sidewalks identified in the Walkability Checklist.

(2) Crosswalks/Street Crossings

The objective defined for crosswalks and street crossings focuses on providing crossings that are safe, easy to use and well-marked, support active, pedestrian-friendly environments, and link both sides of the street physically and visually. The Project would not include crosswalks or street crossings. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to crosswalks and street crossings.

(3) On-Street Parking

The Walkability Checklist strategies regarding on-street parking do not apply to the Project as sufficient off-street parking would be provided to meet and exceed the applicable parking requirements; no on-street parking would be provided by the Project. Therefore,

the Project would not conflict with design strategies identified in the Walkability Checklist related to on-street parking.

(4) Building Orientation

The objective of the utilities section is to minimize the disruption of views and visual pollution created by utility lines and equipment. The Project would screen any rooftop equipment, if necessary, and locate trash enclosures internal to the Project Site so as not to detract from the visual character of the Project Site. In addition, all major utilities would be installed underground. Utilities would also be located away from building entrances. Within the Walkability Checklist, building orientation addresses the relationship between building and street as a means of improving neighborhood character and the pedestrian environment. Recommended implementation strategies that would be incorporated into the Project include: (1) grade level entrances from the public right-of-way for pedestrians; (2) primary entrances to buildings that are visible from the street and sidewalk⁴²; (3) complying with applicable Americans with Disabilities Act (ADA) guidelines at primary pedestrian entrances; (4) direct access to building entrances from sidewalks and streets⁴³; (5) locating buildings at the front property line or at the required setback to create a strong street wall; and (6) the use of architectural features to provide continuity at the street where openings occur. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to building orientation.

(5) Off-Street Parking and Driveways

In terms of off-street parking and driveways, the objective is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include: (1) maintaining continuity of the sidewalk; (2) accommodating vehicle access to and from the Project Site with as few driveways as possible by restricting automobile access to the alley behind the Project Site; (3) limiting the width of each driveway to the minimum width required; (4) illuminating all parking areas and pedestrian walkways; and (5) using architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall. Vehicular access to the Project would be provided via two access points, including one at

⁴² For example: (1) direct entry to Tower A retail and restaurant on Level PB1 from Hill Street; (2) direct entry to Tower B pool deck and bar on Lower Porte Cochere Level from 4th Street; (3) direct entry to Tower B apartment lobby on Level 02 from the corner of Olive Street and 4th Street; and (4) direct entry to Tower B hotel lobby off of 4th Street. There would also be multiple building entries from the proposed plazas and paseos accessed from the adjacent streets (for example, multiple Tower A and B entries off of the North Paseo and Angels Terrace on Level 3 from 4th and Hill Streets, and multiple Tower A entries off of Lower California Plaza on Level 5 from Olive Street). See the figures for the referenced levels in section II, Project Description, of this Draft EIR.

⁴³ Same as above footnote.

Olive Street and another at 4th Street. All parking would be provided within a parking garage with three subterranean levels, and a loading dock would be located beneath the California Plaza along Olive Street. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to off-street parking and driveways.

(6) On-Site Landscaping

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, and add visual relief to the street. As previously described, the Project would increase the amount of landscaping and improve the streetscape. The Project's design would consist of a series of cantilevered floors and landscaped terraced levels that gradually transition from the lowest point of the Project at Hill Street and 4th Street up to California Plaza. Landscaping in open space areas would include gardens and canopy trees, and plant species would consist of both native and adaptive plants. Trees and other landscaping elements would also be provided along the streets surrounding the Project Site. In so doing, the Project would comply with the following implementation strategies: (1) provide canopy trees in planting areas in addition to the street trees; (2) provide plantings that complement pedestrian movement and views; and (3) provide plantings that complement the character of the built environment. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to landscaping.

(7) Building Facades

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. The Project would address many of the relevant implementation strategies, including: (1) incorporating different textures, colors, materials, screening, and distinctive architectural features that add visual interest; (2) adding scale and interest to building façades with articulated massing; (3) reinforcing the existing façade rhythm along the street with architectural elements; (4) discouraging blank walls; (5) including overhead architectural features, such as awnings, canopies, trellises or cornice treatments that provide shade and reduce heat gain; and (6) providing windows at the street. The Project would also undergo City design review. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to building facades.

(8) Building Signage and Lighting

As intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: (1) pedestrian visibility, building identification, and facilitation of access; (2) adequate lighting levels to safely light pedestrian paths;

(3) adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and (4) the use of fixtures that are “dark sky” compliant. Proposed lighting for the Project would include shielded exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, shielded lighting to accent signage, architectural features, exterior artwork or murals, and landscaping elements would be incorporated throughout the Project Site. Exterior Lights would be directed onto the Project Site and designed to minimize light trespass from the Project Site. New sources of artificial lighting that would be introduced by the Project include interior lighting and automobile headlights. Project signage would include a central identity sign located at Hill Street 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. In general, new signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the proposed uses.

In addition, the Project would be subject to design review by the City’s Urban Design Studio and may incorporate additional elements identified by the Urban Design Studio during their review that would further promote the Project’s consistency with the applicable requirements of the City’s various urban design plan documents. Therefore, the Project would not conflict with the design strategies identified in the Walkability Checklist related to building signage and lighting.

(9) Conclusion

In summary, with approval of the requested discretionary actions outlined above, the Project would be consistent with applicable provisions of the Walkability Checklist.

(b) Consistency with the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

The Project’s consistency with the applicable goals set forth in the 2016–2040 RTP/SCS is analyzed in Table 7 in Appendix F of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the accessibility to and productivity of the region’s transportation system by locating density on an urban infill site within a City-designated TPA and SCAG-designated HQTAs in close proximity to jobs, shopping, services and transit. Relatedly, the Project would encourage land use and growth patterns that facilitate transit and active transportation for the same reasons.

Developing 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. Furthermore, the Project's location within the City's Downtown Center, development of functional linkages to adjacent uses and streets, and close proximity to neighborhood serving uses, as well as arts and entertainment destinations, also offers hotel guests, tenants, and employees convenient access to amenities by foot, bicycle, or public transit, which reduces vehicle trips thus improves air quality and encourages active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area served by an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including two Metro rail lines. The Metro B/D Lines Pershing Square Station portal is located within the Project Site. In addition, the Project would provide bicycle parking spaces for the proposed uses that would promote the use of bicycles. . Lastly, the Project would develop sustainable buildings through construction in accordance with the energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CalGreen and would include charging stations for electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking.

(c) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would not conflict with the applicable goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with or impede the General Plan, Central City Community Plan, DTLA 2040 Plan, Bunker Hill Specific Plan, LAMC, or the whole of the relevant environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant.

(2) Mitigation Measures

The Project's impact with regard to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 50 related projects in the vicinity of the Project Site. The related projects generally consist of infill development including mixed-use, retail, restaurant, residential, hotel and office uses within the Downtown area. As with the Project, many of the related projects are proposed for properties designated as Regional Center Commercial land uses. The designation is intended to accommodate high-density residential, mixed-use residential and commercial, hotel, office, and entertainment uses. Many of the related projects include mixed-use residential, retail/restaurant, office, and hotel development which would add to the vibrancy of the Downtown region.

The increase in density of the related projects, in conjunction with the Project, would be consistent with the applicable plans and goals to intensify development in the Downtown area. There are 20 related projects located within the Bunker Hill and Historic Core districts. Most of these projects are mixed-use residential, hotel, office, and retail development. Of the 50 related projects, the following 4 related projects are located adjacent to or within 500 feet of the Project Site:

- Related Project No. 1: 340 S. Hill Street; 406 apartment units, 22 affordable units, 2,980 square feet office, and 2,630 square feet retail.
- Related Project No. 2: 437 S. Hill Street; 660 condominium units and 13,742 square feet restaurant.
- Related Project No. 3: 400 S. Broadway; 450 apartment units, 6,904 square feet retail, and 5,000 square feet bar.
- Related Project No. 5: 323 W. 5th Street; 190 room hotel, 6,100 square feet meeting room, 31 apartment units, and 29,200 square feet restaurant.

These projects, along with the Project, would provide needed housing, hotel rooms, and jobs in the Downtown area; provide amenities to visitors, residents, and workers; concentrate development near public transit; and activate the Downtown region. These projects are consistent with the high-rise, high-density development identified in the Framework Element and Community Plan. As such, the high-density mixed-use development would be consistent with the general intent of these plans to provide additional housing, guest rooms, and job opportunities; intensify development near public transit and job centers; and encourage an active 24-hour Downtown environment.

Furthermore, the Project and the related projects combined would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, cumulative impacts with regard to conflicts with land use plans would be less than significant and would not be cumulatively considerable.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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