

Environmental Impact Analysis

G. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would physically divide an established community and whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR.

Analyses of consistency with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including the following:

- The Project's consistency with the Southern California Association of Government's (SCAG's) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (*2016-2040 RTP/SCS*), *Connect SoCal* (*2020-2045 RTP/SCS*), and smart growth principles that are embodied in SB 375, the *2016 Air Quality Management Plan*, and the *Air Quality Element of the General Plan* are analyzed in **Section IV.A, Air Quality**, of this Draft EIR;
- The Project's consistency with the *2016-2040 RTP/SCS*, *2020-2045 RTP/SCS*, SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, and L.A.'s *Green New Deal: Sustainability Plan 2019* are analyzed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR;
- The Project's consistency with the *City of Los Angeles General Plan Noise Element* and Chapter XI of the LAMC, which includes the City's comprehensive noise ordinance, are analyzed in **Section IV.H, Noise**, of this Draft EIR;
- The Project's consistency with the *2016-2040 RTP/SCS*, the *City of Los Angeles General Plan Framework Land Use, Housing and Economic Chapters*, the *City of Los Angeles General Plan Housing Element*, and L.A.'s *Green New Deal: Sustainability Plan 2019* are analyzed in **Section IV.I, Population and Housing**, of this Draft EIR;
- The Project's consistency with the *City of Los Angeles General Plan Framework Infrastructure and Public Services Chapter*, the *City of Los Angeles General Plan Safety Element*, the *2018-2020 Strategic Plan*, the *Los Angeles Public Library (LAPL) Branch Facilities Plan*, and the *LAPL Strategic Plan 2015-2020* are analyzed in **Section IV.J, Public Services**, of this Draft EIR; and

- The Project's consistency with the 2016-2040 RTP/SCS, *City of Los Angeles Mobility Plan 2035*, and the LAMC are analyzed in **Section IV.K, Transportation**, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Central City Community Plan
- Los Angeles Municipal Code
- City Center Redevelopment Plan
- Citywide Design Guidelines
- Downtown Design Guide

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable

Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(2) Regional

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

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)¹ by six percent and the share of new job growth in HQTAs by 15 percent.

(3) Local

(a) *City of Los Angeles General Plan*

The City of Los Angeles General Plan (General Plan)², originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the

¹ HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

² City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, 2021. <https://planning.lacity.org/plans-policies/general-plan-overview>. Accessed March 5, 2021.

City, while integrating a range of state-mandated elements,³ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The General Plan Framework provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(a) Land Use Chapter

The General Plan Framework Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment. The Framework Element identifies the site as located within the 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."

(b) Housing Chapter

The overarching goal of the General Plan Framework Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The General Plan Framework Housing Chapter recognizes that the distribution of housing in proximity to transit can

³ The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

reduce vehicle trips and provide residents with the opportunity to walk between their home, job, and/or neighborhood services. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

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

(c) Urban Form and Neighborhood Design Chapter

The General Plan Framework Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.⁴ The General Plan Framework does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. 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. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(d) Open Space and Conservation Chapter

The General Plan Framework Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperative require the City to take full advantage of all existing open space elements. The ecological dimension is based

⁴ City of Los Angeles General Plan Framework, page 5-1, et. seq.

on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

(e) *Economic Development Chapter*

The General Plan Framework Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The chapter also establishes mutual development objectives for land use and economic development. This Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

(f) *Transportation Chapter*

The General Plan Framework Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other Framework chapters of the General Plan Framework regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the General Plan Framework is implemented through the General Plan's Mobility Plan 2035, which is a comprehensive update of the General Plan Transportation Element. Refer to **Table IV.G-6, Project Consistency with Applicable Goals of the Mobility Plan 2035** for further discussion of the Project's consistency with the *Mobility Plan*.

(g) *Infrastructure and Public Services Chapter*

The General Plan Framework Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. 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). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

(ii) Transportation Element

The Transportation Element (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates “complete streets” principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City’s transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City’s high-level mobility priorities:

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

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City’s natural resources. Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element 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 protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) Housing Element

The Housing Element of the General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City’s housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City’s housing and growth strategy, and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

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

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

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, 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.⁵ Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes the following goals:

- Los Angeles, A Leader in Health and Equity;
- A City Built for Health;
- Bountiful Parks and Open Spaces;
- Food that Nourishes the Body, Soul, and Environment;
- An Environment Where Life Thrives;
- Lifelong Opportunities for Learning and Prosperity; and
- Safe and Just Neighborhoods.

Included in this General Plan Element are policies pertaining to the arrangement of land uses within the City and building design procedures.⁶ As such, these policies address characteristics of the physical environment that contribute to public health.

(vi) *Central City Community Plan*

The Central City Community Plan guides land uses on the Project Site and in the surrounding areas. The current plan (adopted January 8, 2003) sets forth planning goals and objectives to encourage progress and change within the community to meet anticipated needs and

⁵ *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015*, https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf. Accessed March 5, 2021.

⁶ *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015*. Policy 2.2, *Healthy building design and construction*, page 42; and Policy 5.7, *Land use planning for public health and GHG emission reduction*, page 94.

circumstances, promote balanced growth, and build on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible.

Currently, there is a joint update proposal, called the DTLA 2040 Plan, of the Central City Community Plan and Central City North Community Plan, the two community plans that comprise Downtown Los Angeles. The updated plans are intended to shape the future of Downtown Los Angeles by reinforcing its job orientation and supporting a transit and pedestrian-oriented environment.⁷ In its current draft stage, the DTLA 2040 Plan proposes a land use designation for the Project Site as Transit Core, which is a dense center of activity located around regional transit hubs, and for which there are no vehicular parking minimums. The maximum floor area ratio (FAR) for the proposed land use designation would range between 10:1 and 13:1.⁸

As shown in **Figure IV.G-1, Central City Community Plan Land Use Designations**, the currently adopted Community Plan designates the Project Site, which is located within the South Park subarea, for High Medium Residential land uses. The High Medium Residential land use designation permits a range of corresponding residential zones and commercial zones that allow for a variety of hotel, restaurant, retail, and multi-family dwelling unit developments.

(b) *Los Angeles Municipal Code*

All development activity on the Project Site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. As shown in **Figure IV.G-2, City Zoning Designations**, the Project Site currently has a zoning designation of [Q]R5-4D-O, for High Density Residential in Height District 4 with “Q” Qualified Conditions and a “D” Development Limitation, pursuant to Ordinance No. 164307-SA3030, within an Oil Drilling Overlay.

Land uses allowed in the R5 zone include most uses allowed in the R4, R3, R2, and R1 zones. As described in the LAMC, there are exceptions to allowable uses within each permitted zone. Generally, allowable uses include hotels, clubs or lodges, hospitals or sanitariums, accessory buildings, skilled nursing care housing, and Alzheimer’s/dementia care housing. Furthermore, pursuant to LAMC Section 12.21 A.18, uses permitted in the C2 zone are permitted on lots zoned R5 within the Central City Community Plan area. Thus, hotel, restaurant, retail, and multi-family dwelling unit developments are permitted uses within the R5 Zone.

The Q Condition on the Project Site limits the permitted uses to: (i) residential uses permitted in the R5 Zone; (ii) hotels, motels, and apartment hotels; (iii) parking buildings, provided such parking is accessory to the main use of the lot; (iv) any other uses permitted in the C4 Zone within buildings which were in existence on the lot upon the effective date of the ordinance; (v) any other use permitted in the C4 Zone provided the floor area ratio of such use does not exceed 2:1; and

⁷ City of Los Angeles Department of Planning, DTLA 2040, Website, accessed: October 2, 2019.

⁸ City of Los Angeles Department of Planning, DTLA 2040, Website, accessed: October 2, 2019.

(vi) any other uses permitted in the C4 Zone provided the development plan is approved by the City Planning Commission and CRA/LA. The LAMC also defines yard setbacks, building heights, and floor area ratios per the zoning designation of a parcel.

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LAND USE

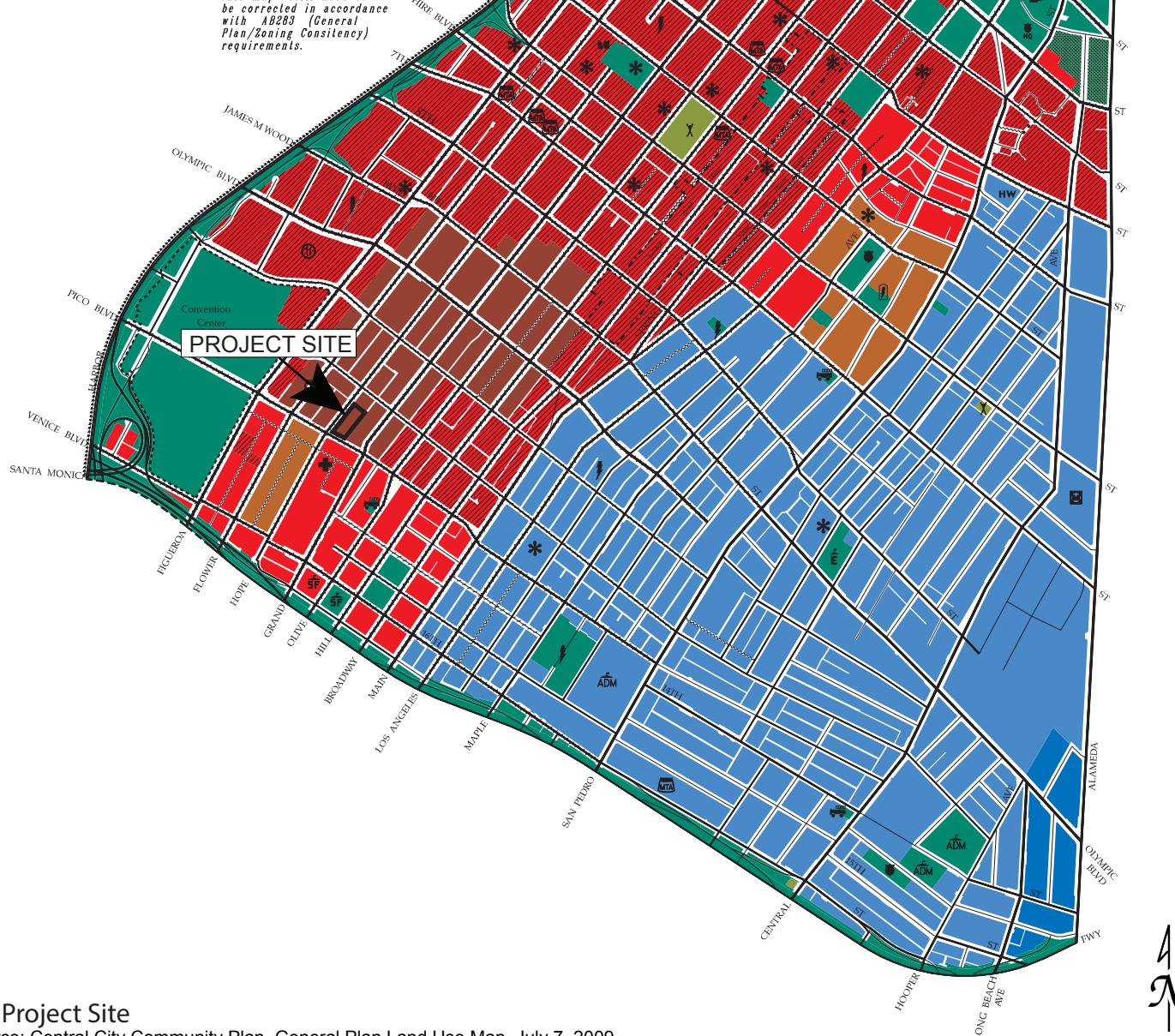
RESIDENTIAL ¹⁰	CORRESPONDING ¹¹ ZONES	CORRESPONDING ¹³ ZONES
MULTIPLE FAMILY		COMMERCIAL
HIGH MEDIUM ¹⁴ R4	HIGH ¹⁵ R5	COMMUNITY ¹⁶ CR,C2,C4, RAS3,RAS4

REGIONAL ¹⁷	CR,C1,5,C2,C4,C5, R3,R4,R5,RAS3,RAS4
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INDUSTRIAL	OPEN SPACE, PUBLIC/ QUASI-PUBLIC
LIGHT ²⁴ MR2,M2	OPEN SPACE OS,A1
HEAVY ²⁴ M3	PUBLIC FACILITIES ^{23,14} PF

OTHER PUBLIC OPEN SPACE ¹⁸
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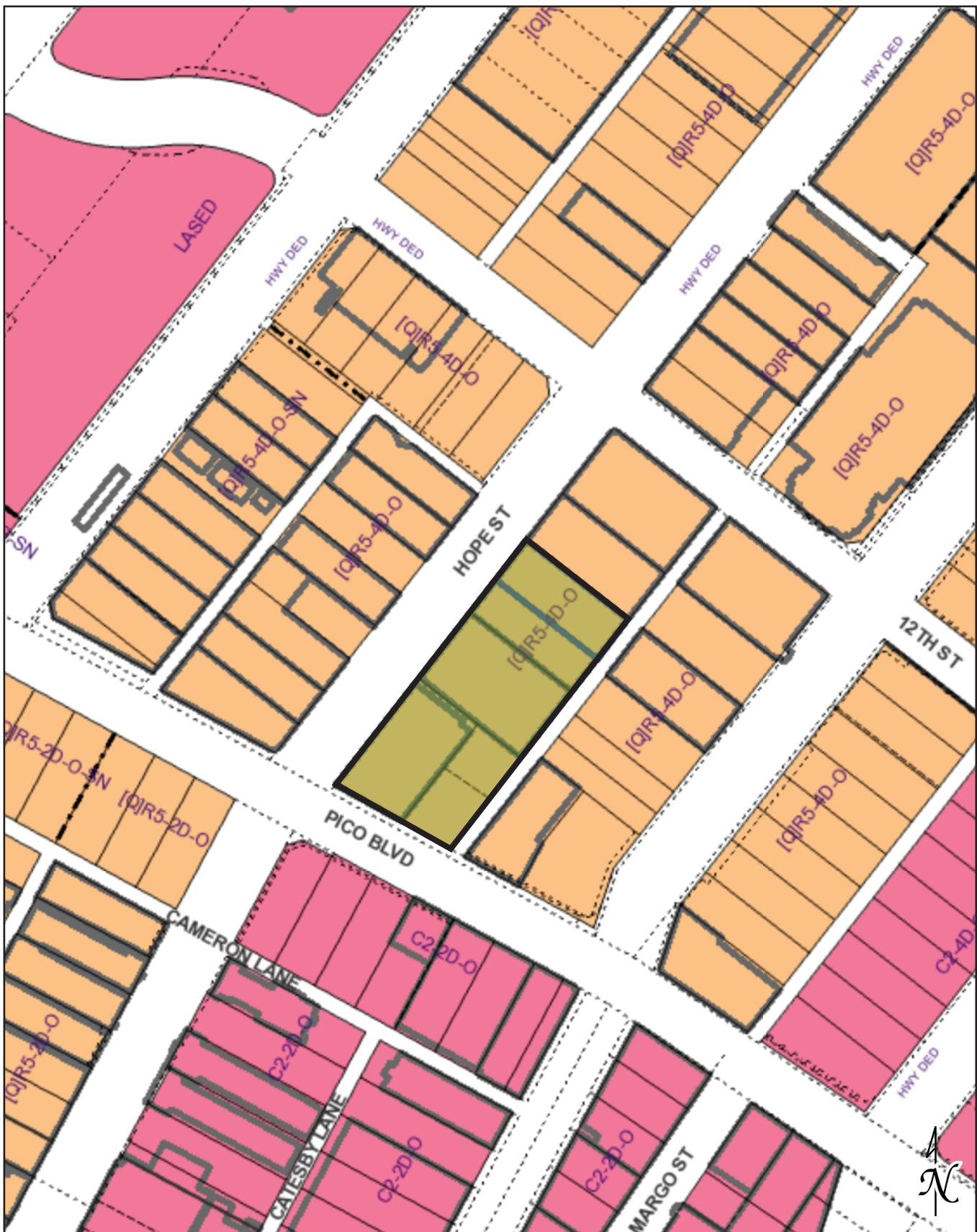
* Properties designated as Public/Quasi-Public on this map still need to be converted in accordance with AB283 (General Plan/Zoning Consistency) requirements.



Project Site

Source: Central City Community Plan, General Plan Land Use Map, July 7, 2009.

Figure IV.G-1
Central City Community Plan Land Use Designations



Project Site

Source: City of Los Angeles Planning Zimas Maps, April 2019.

Figure IV.G-2
City Zoning Designations

(i) Setback Requirements

Pursuant to LAMC Section 12.22.A.18(c)(2), yard setbacks shall not apply to development with a combination of commercial and residential uses within R5 zones to the portions of buildings used exclusively for commercial uses or to the portions of such buildings which are used exclusively for residential uses and which abut a street, private street or alley, if the first floor of such buildings at ground level is used for commercial uses or access to the residential portions of such buildings.

(ii) Height District and Floor Area

The Project Site is located within Height District 4D. The 4 indicates the Project Site is in an area that has no height limit and a permitted floor area ratio (FAR) of 13:1, or 13 times the lot area. However, the D Limitation on the Project Site restricts the FAR to 6:1 unless: (i) the project is approved under Section 512.4⁹ for the transfer of floor area (TFAR) under the Redevelopment Plan; (ii) the project is approved under Section 512.2 of the Redevelopment Plan for the rehabilitation and/or remodeling of existing buildings; or (iii) the project is approved pursuant to any TFAR procedure adopted by the City. Section 512.2 states that “[n]otwithstanding the maximum Floor Area Ratios [...] structures which existed in the Project Area prior to the adoption of this Plan may be expanded in size in connection with the rehabilitation or remodeling of such structures.” Section 512.2 further provides that if the existing structure has a FAR of less than 6:1, then the expansion is limited to no more than 25 percent above the maximum FAR, or 7.5:1.

(c) City Center Redevelopment Project Area

The Project Site is located within the *City Center Redevelopment Project* (Redevelopment Project) area, as adopted on May 15, 2002, by the former Community Redevelopment Agency of Los Angeles (CRA/LA), which establishes a 30-year Redevelopment Plan to eliminate and prevent the spread of blight, and will end on May 15, 2032.¹⁰ The Redevelopment Plan provides supplemental guidance for development. In 2011, Assembly Bill x1 26 dissolved all California redevelopment agencies, including the CRA/LA. The dissolution of the agencies became effective February 1, 2012. Assembly Bill x1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Redevelopment Plan and its requirements for development within the Redevelopment Project Area are still in effect. The City initially declined to be the successor agency to the CRA/LA, thus a Designated Local Authority (DLA) was formed. However, on September 20, 2019, the City adopted Ordinance 186325, which transferred the land use authority of the DLA to the City. The Department of City Planning is currently tasked with implementing and enforcing the requirements of the Redevelopment Plan, but active coordination continues between the City and the DLA regarding transferring those rights and responsibilities to the City of Los Angeles Department of City Planning. Accordingly, this Draft EIR assumes the continued applicability of the Redevelopment Plan and addresses the Project's consistency with the Redevelopment Plan. For purposes of this Draft EIR, any references to the CRA/LA are

¹⁰ *City of Los Angeles Community Redevelopment Agency, City Center Redevelopment Project, May 15, 2002, Website, accessed September 2019.*

intended to reference the DLA and/or the Department of City Planning pursuant to these recent changes.

Community Plan land use and zoning designate land uses allowed within the Redevelopment Plan area. The Project Site, zoned [Q]R5-4D-O, is designated for multiple dwelling land uses. Land uses permitted in the [Q]R5-4D-O zone include, but are not limited to, uses permitted under the C2 Zone, such as hotel, restaurant, retail, and multi-family dwelling unit developments. The maximum FAR for the Redevelopment Plan area is 6:1, as set forth in Section 512 of the Redevelopment Plan. However, Section 512 of the Redevelopment Plan allows for higher maximum FARs through transfer of floor area.

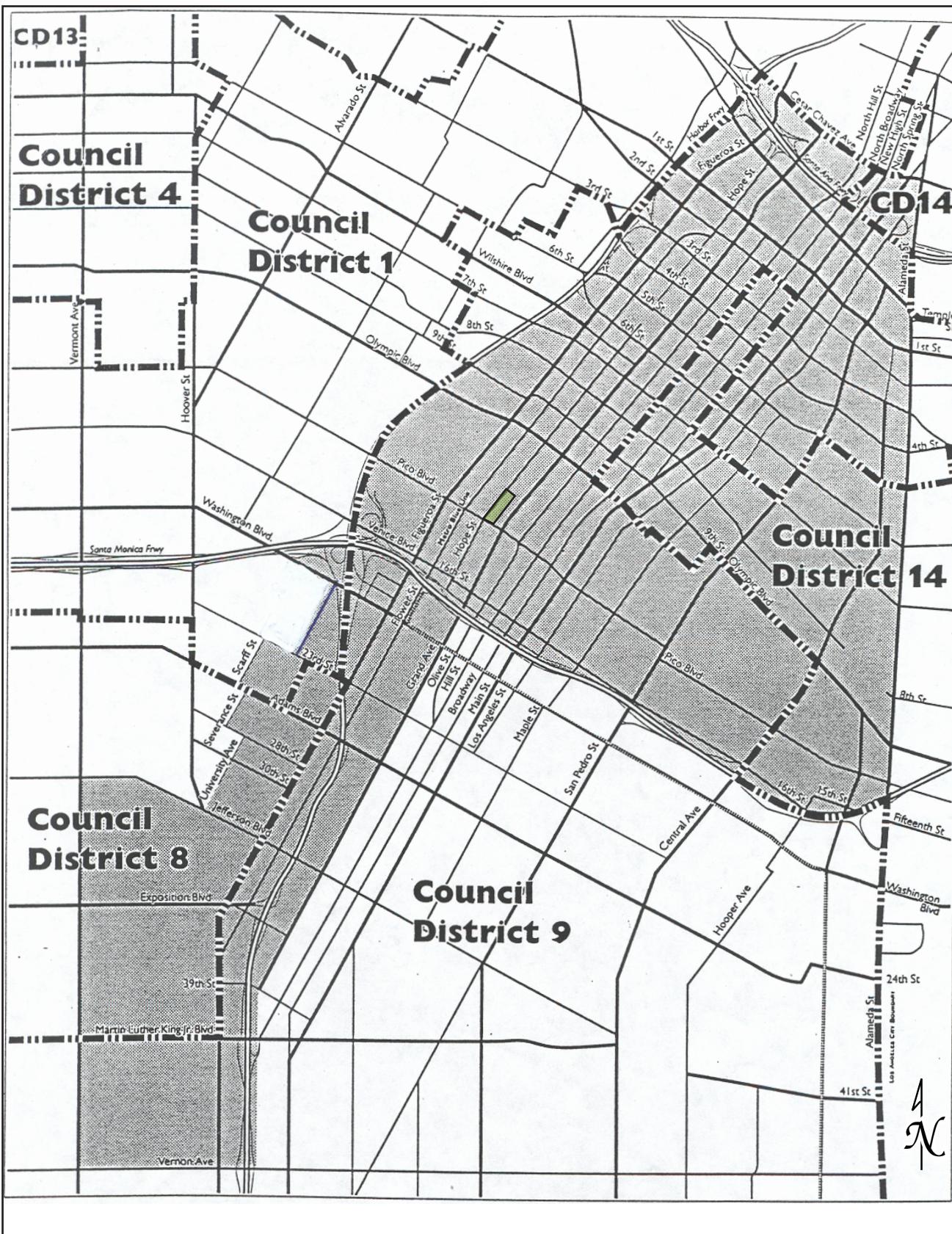
(d) Greater Downtown Housing Incentive Area

The Project Site is located within the GDHIA Ordinance (Ord. No. 179,076) that was established in 2007 to encourage developers to build new economically diverse, urban infill housing. The boundaries for the GDHIA are those portions of the Central City and Southeast Los Angeles Community Plan areas generally bounded by the 101 Freeway on the north, Figueroa Street (south of Adams Blvd.) on the west, Alameda and Grand Avenue (south of 21st Street) on the east, and Martin Luther King Jr. Blvd (west of Broadway) on the south. Specifically, the GDHIA Ordinance amended requirements within LAMC Sections 12.03, 12.22, 12.24, 16.05, 17.05 and 17.52 pertaining to:

- The maximum unit per lot area was eliminated; density is unlimited (within the relevant FAR),
- All yard requirements were eliminated,
- Buildable Area is the same as Lot Area,
- The percentages of private and common open space were eliminated; however, the total per unit open space requirement shall still be provided, and
- Tract and parcel maps may include land set aside for street or alley purposes within the calculation of allowable floor area.

(e) Adaptive Reuse Incentive Area

The City adopted the Adaptive Reuse Ordinance in 1999 to help revitalize the Greater Downtown Los Angeles Area (refer to **Figure IV.G-3, Downtown Adaptive Reuse Project Area**) and implement the General Plan by facilitating the conversion of older buildings, many of which are economically distressed and historically significant, to more productive uses. The ordinance applies to the modification of buildings constructed before 1974, or designated historical structures, located in the downtown area. The ordinance defines an Adaptive Reuse Project as any change of use to new dwelling units, guest rooms, or joint living and work quarters in all or any portion of a building constructed prior to July 1, 1974, or a historically significant building.



 Project Site

Source: City of Los Angeles Planning Adaptive Reuse Ordinance, December 2001.

Figure IV.G-3
Downtown Adaptive Reuse Project Area

(f) *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. 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 initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays. The applicable standards and a consistency analysis of the Citywide Design Guidelines are discussed in **Table IV.G-8, Consistency with Applicable Standards and Guidelines of the Citywide Design Guidelines**, found in **Appendix N** of this Draft EIR.

(g) *Downtown Design Guide, Urban Design Standards and Guidelines*

On April 24, 2009, the Los Angeles City Council approved a General Plan Amendment to the Central City Community Plan to revise Chapter V of the Central City Community Plan text to incorporate the *Downtown Design Guide, Urban Design Standards and Guidelines* (Downtown Design Guide). The Downtown Design Guide includes both standards (requirements) and guidelines (suggestions). Projects must comply with standards and are strongly encouraged to comply with guidelines. The Downtown Design Guide implements streetscape and landscape criteria, and defines criteria for building massing, street wall, ground floor treatment, setbacks and sidewalks, parking and access, on-site open space, architectural detail, and signage. The applicable standards and a consistency analysis of the Downtown Design Guide are discussed in **Table IV.G-9, Consistency with Applicable Standards and Guidelines of the Downtown Design Guide**, found in **Appendix N** of this Draft EIR.

(h) *Transit Priority Area*

The Project is located within a Transit Priority Area (TPA) pursuant to Senate Bill 743, due to its proximity to a "major transit stop" as defined in Public Resources Code Section 21064.3. The Public Resources Code defines a TPA as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a 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 AM and PM peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or 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. Metro, LADOT, Santa Monica Big Blue Bus, and the Orange County Transit Authority run multiple bus lines, including local and rapid lines, along Pico Boulevard, Broadway, Hill Street, Grand Avenue, Olive Street, and Main Street. The Metro Light Rail Pico Station, a major transit stop, is located approximately 0.1-mile to the northwest of the Project Site. This station provides access to the Metro A Line (Blue) and E Line (Expo). The A Line (Blue) runs north-south providing service from downtown Los Angeles to Long Beach. The Metro E Line (Expo) runs east-west providing service from Downtown Los Angeles to Santa Monica.

b) Existing Conditions

(1) Project Site

The Project Site comprises five parcels along the southwest side of the block bounded by 12th Street to the north, Grand Avenue to the east, Pico Boulevard to the south, and Hope Street to the west. The Project Site is currently developed with two one-story and one two-story commercial industrial buildings fronting Hope Street built around 1918; the four-story Morrison Hotel, built in 1914 at the corner of Hope Street and Pico Boulevard; and an associated surface parking lot adjacent to the Morrison Hotel containing 32 parking spaces and comprised of approximately 56,325 square feet. The three commercial industrial buildings on the Project Site are currently used as office/warehouse buildings. The Morrison Hotel has 111 former SRO units and has been unoccupied since 2008.¹¹ SurveyLA identified the Morrison Hotel as eligible for listing in the California Register and for designation as a Historic Cultural Monument (HCM). Photos of the existing land uses on the Project Site are presented in **Figures II-2 and II-3, Views of Project Site**, in **Section II, Project Description**.

(2) Surrounding Land Uses

The Project Site is located within the South Park subarea, as designated in the Central City Community Plan. The South Park subarea is bounded by the Harbor Freeway to the south, Main Street to the east, 8th Street to the north, and the Santa Monica Freeway to the west. It is primarily made up of residential, medical, commercial, and retail uses, with warehouse space in one-story unreinforced masonry buildings scattered throughout the South Park subarea. The Project Site has frontage along Hope Street and Pico Boulevard. The land uses within the Project's general vicinity are characterized by a mix of low- to medium-intensity industrial, commercial, and residential uses, which vary widely in building style and period of construction. The surrounding properties include industrial, commercial retail, residential, and surface parking lots. The Project

¹¹ *The Applicant intends to coordinate with the CRA/LA* to provide replacement units on a one-to-one basis consistent with the Wiggins Settlement Agreement and Development Guidelines and Controls for Residential Hotels in the City Center and Central Industrial Redevelopment Project Areas.*

* *The Department of City Planning is currently tasked with implementing and enforcing the requirements of the Redevelopment Plan, but active coordination continues between the City and the DLA regarding transferring those rights and responsibilities to the City of Los Angeles Department of City Planning. Accordingly, this Draft EIR assumes the continued applicability of the Redevelopment Plan and addresses the Project's consistency with the Redevelopment Plan. For purposes of this Draft EIR, any references to the CRA/LA are intended to reference the DLA and/or the Department of City Planning pursuant to these recent changes.*

Site is bound by a commercial industrial building to the north; an alleyway, mixed-use residential, commercial, and surface parking to the east; Pico Boulevard and mixed-use residential to the south; and Hope Street, commercial industrial uses, and surface parking to the west.

3. Project Impacts

a) Thresholds of Significance

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

Threshold a) Physically divide an established community; or

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions:

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

Regarding conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding an environmental effect, the Thresholds Guide identifies the following factors:

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

b) Methodology

CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies with applicable plans. Additionally, 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 by 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.¹² Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

In addition, to the extent that the projects' potential conflict with a plan, program or policy is analyzed in another section of the EIR (e.g., Air Quality Management Plan in the Air Quality section and the Mobility 2035 Plan in the Transportation section) that plan is not further discussed in the Land Use Section.

In assessing impacts related to land use and planning in this section, the City will use Appendix G as the thresholds of significance.

c) Project Design Features

No specific Project Design Features are proposed with regards to land use and planning.

d) Analysis of Project Impacts

Threshold a) Would the project physically divide an established community?

(1) Impact Analysis

As discussed in **Section V, Other CEQA Considerations**, and in the Initial Study (**Appendix A**), the Project would not physically divide an established community. **Therefore, the Project would have no impact with respect to Threshold a).**

(2) Mitigation Measures

The Project would not result in significant impacts from division of community. Therefore, no mitigation measures are recommended.

(3) Level of Significance After Mitigation

Project-level impacts related from division of community would be less than significant.

¹² *State of California, Governor's Office of Planning and Research, General Plan Guidelines, page 255, 2017.*

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

(1) Impact Analysis

As previously discussed, the development of the Project would be subject to numerous City land use plans, policies, and regulations, including the development regulations in the LAMC. The Project's consistency with the policies and goals of applicable land use plans and policy documents is discussed below. As required by CEQA, the Project's consistency with the AQMP is addressed in **Section IV.A, Air Quality**, of this Draft EIR.

(a) *Regional Transportation Plan*

Conflicts and consistency of the Project with the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS are addressed in **Table IV.G-1, Consistency with Applicable Goals of 2016-2040 RTP/SCS** and **Table IV.G-2, Consistency with Applicable Goals of the 2020-2045 RTP/SCS**, found in **Appendix N** of this Draft EIR.

Based on the analysis presented in **Table IV.G-1**, and **IV.G-2**, the Project would not conflict with applicable 2016-2040 or 2020-2045 RTP/SCS goals. The Project would be located in an area well-served by public transit, including bus and rail service provided by the Metropolitan Transportation Authority (Metro), the LADOT Dash service (DASH- LDD and LDF) and Commuter Express Service (CE), Santa Monica Big Blue Bus (BBB), Orange County Transportation Authority (OC), and Metro Rapid. The Pico Metro Station is located along Flower Street north of Pico Boulevard approximately 600 feet walking distance from the Project Site.

Metro Transit local lines provide service along Hope Street in the Project area, including:

- Metro 30/330

Metro Rail lines, Commuter Express, and Orange County Transportation Authority provide service along Flower Street in the Project area, including:

- Metro E Line (Expo)
- Metro A Line (Blue)
- Metro J Line (Silver) and Silver Express OC 701 and 721
- CE 438 and 448

Metro Transit local lines, Big Blue Bus, DASH, and Commuter Express, provide service along Grand Avenue in the Project area, including:

- Metro 37, 70, 71, 76, 78, 79, 96, 378, and Rapid 770
- BBB R10

- CE 431 and 437
- LDD

Metro Transit lines, Commuter Express, and DASH provide service along Figueroa Street in the Project area, including:

- Metro 81, 442,460
- Metro Silver Line and Silver Express CE 438 and 448
- LDF

Metro Transit local lines and Metro Rapid lines provide service along Venice Boulevard in the Project area, including:

- Metro Transit Lines 2, 4, 33, and 302
- Metro Rapid Lines 733 and 770

There is a Route 30/330 bus stop on the south side of Pico Boulevard, south of Hope Street, approximately 100 feet from the Project Site and a bus stop on the north side of Pico Boulevard, east of Grand Avenue, approximately 500 feet from the site.

There are bus stops at Grand Avenue and Pico Boulevard approximately 500 feet from the Project Site for Routes 37, 70, 71, 76, 78, 79, 96, 378, 7790, BBR10, CE431, CE437 & LDD.

The Pico Metro Station is approximately 500 feet from the Project Site and provides rail service for the Metro A Line (Blue), which operates between 7th Street/Metro Center and downtown Long Beach, as well as service for the E Line (Expo), which operates between the 7th Street/Metro Center and downtown Santa Monica.

The Project would include short-term and long-term bicycle facilities, an entry courtyard, widened and improved sidewalks, and landscaping. The Project includes one vehicular driveway on Hope Street, thus creating separation between pedestrian and vehicular areas. In addition, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities the South Park area.

The Project would construct hotel, restaurant, museum, and residential uses that would encourage and contribute to regional economic prosperity. As described above, the Project location proximate to transit and nearby attractions, restaurants, and job centers would support an integrated development pattern that encourages the use of active transportation and the reduction of VMT.

As shown in **Table IV.G-1** and **Table IV.G-2**, found in **Appendix N** of this Draft EIR, the Project would not be in conflict with the 2016-2040 or 2020-2045 RTP/SCS goals to maximize mobility

and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, facilitate the use of alternative modes of transportation, contribute to regional prosperity, and support healthy and equitable communities.

(b) *General Plan Framework Element*

The consistency of the Project with applicable objectives and policies in the Framework is presented in **Table IV.G-3, Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element**, found in **Appendix N** of this Draft EIR.

The Project would generally not conflict with the policy and objectives of the Land Use Chapter by supporting the needs of the City's existing and future residents, businesses, and visitors by providing residential, hotel, and commercial land uses. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution while supporting the City's objective to encourage commercial uses along primary transit corridors/boulevards and in the designated Downtown Center area.

The Project would not conflict with policies and objectives of the Housing Chapter by providing new housing units near existing transit. The scale and character of the Project is consistent with the surrounding urbanized area.

The Project would not conflict with the goal, objectives and policies of the Urban Form and Neighborhood Design Chapter by providing new residential and commercial uses and streetscape improvements that would enhance pedestrian activity.

The Project would not conflict with the Open Space and Conservation Chapter by providing a minimum of approximately 15,215 square feet of on-site open space. The Project's various amenities would include two swimming pools, fitness and area, coworking space, and terraces. The Project would include restaurants with outdoor seating and landscaping throughout. The Project would include a shared 1,048-sf residential amenity balcony at Level 6. All residential units would include private balconies, for a total of 6,800 sf of private residential balconies; however, the dimensions do not fulfill the minimum criteria established by Section 12.21 G of the Los Angeles Municipal Code (6 feet in all directions at Private Open Space; 15 feet at Common Open Space) and are therefore not counted as part of Project open space.

The Project would not conflict with the Economic Development Chapter by bringing new economic investment to South Park in an area well-served by existing transit. Furthermore, the Project would contribute to the establishment of a 24-hour community that would benefit existing businesses in the area.

The Project would not conflict with the Transportation Chapter by supporting an area targeted for high-density and a focal point of regional commerce identity and activity through the provision of additional housing and commercial uses and employment opportunities for the South Park area. The Project would augment the streetscape with retail and dining uses along with streetscape improvements that would enhance pedestrian circulation.

The Project would not conflict with the Infrastructure and Public Services Chapter by reducing the amount of hazardous substances and the total amount of flow entering the wastewater system through implementation of Stormwater Pollution Plan and Best Management Practices. The Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and its water demands will be met by the City of Los Angeles Department of Water and Power (LADWP).¹³

In summary, the Project would not conflict with the applicable goals, objectives, and policies in the General Plan Framework Element.

(c) General Plan Housing Element

The Project's consistency with applicable objectives and policies of the Housing Element is presented in **Table IV.G-4, Project Consistency with Applicable Policies of the Housing Element**, found in **Appendix N** of this Draft EIR.

Based on the analysis presented in **Table IV.G-4**, the Project would not conflict with the applicable objectives and policies in the Housing Element. The Project would provide 136 new residential units that would add to the citywide housing supply. The Project would be a mixed-use development that would include new jobs associated with hotel, retail and restaurant uses that is accessible to local and rapid bus lines. In addition, The Project would promote and facilitate reduction of water consumption through the use of water saving and energy saving devices such as low-flow toilets and urinals. Finally, the Project would be an infill, urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the Central City Community Plan and the City Center Redevelopment Project.

(d) Central City Community Plan

The consistency of the Project with applicable policies and objectives in the Central City Community Plan is presented in **Table IV.G-5, Project Consistency with Applicable Objectives and Policies of the Central City Community Plan**, found in **Appendix N** of this Draft EIR.

The purpose of the Community Plan is to guide future development within the plan area. It also recognizes that the plan is subject to periodic reviews and amendments to reflect change in circumstances to account for the evolution of the Central City area as the urban core of the City. Within the last several years, the Central City area has undergone unprecedented development. Accordingly, the City is updating the Community Plan, as described below under DTLA 2040, to reflect the existing development patterns and anticipate areas appropriate for certain types of development and density.

¹³ Los Angeles Department of Water and Power, Water Supply Assessment – Morrison Project for for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020. Refer to **Appendix H.2** of this Draft EIR.

The High Density Residential land use designation permits a range of corresponding commercial zones that allow for a variety of commercial and residential uses and intensities, and the Project would provide a mix of conforming uses. As the Project is located within the South Park community of downtown Los Angeles, the Proposed Project buildings have been designed to be compatible with the urban nature of the existing community, which includes new and old industrial, residential, and general commercial uses in buildings varying from one story to skyscrapers.

The Project would also be generally consistent with the draft policies of the proposed 2040 DTLA Community Plan land use designation of Transit Core, which are dense centers of activity located around regional transit hubs planned for 10:1 to 13:1 FAR. It should be noted that the City may in its discretion permit an 86 percent parking reduction in connection with the Zone Variance to reduce parking at the Project Site from 233 vehicular parking spaces to 52 vehicular parking spaces. The parking reduction would support the anticipated parking requirements in 2040 DTLA Community Plan, as no parking minimums are part of the Transit Core under the proposed plan.

(e) Health and Wellness Element (Healthy LA Plan)

The Healthy LA Plan identifies seven primary goals and associated objectives and policies and possible programs that serve as the implementation blueprint for creating healthier, vibrant communities. As shown in **Table IV.G-6, Consistency with Applicable Policies of the Healthy LA Plan**, found in **Appendix N** of this Draft EIR, the Project would implement a number of the Healthy LA Plan policies.

The Project promotes healthy building design by providing an enhanced pedestrian-oriented design with ground floor lobby entrances, gallery/loggia space, outdoor dining area, and open space and recreation facilities for tenants and guests. The Project promotes active transportation with the provision of long term and short-term bicycle stalls, widened and improved sidewalks, and vehicular access limited to one driveway on Hope Street to create safe separation between vehicles and pedestrians. Overall, the Project repurposes the Project Site by converting commercial industrial buildings and a vacant hotel into a mixed-use project with residential, hotel, and commercial amenities, with pedestrian-oriented design on the ground floor, and modified vehicular circulation, which enhances the built environment in the surrounding Project vicinity. Open Space includes two swimming pools, fitness rooms, meeting rooms, and terraces. The Project would concentrate new development and jobs within an infill site that is walking distance to several Metro, LADOT, Santa Monica, and Orange County bus lines and within 500 feet of the Metro Pico Station, with access to two Metro rail lines, which helps reduce vehicle use and thereby reduce emissions from mobile sources.

(f) Mobility Plan 2035 and 2010 Bicycle Plan

The consistency of the Project with applicable goals in the Mobility Plan 2035 is presented in **Table IV.G-7, Project Consistency with Applicable Policies of the Mobility Plan 2035**, found in **Appendix N** of this Draft EIR.

The Project would not conflict with the relevant polices that support the goals and objectives of the Mobility Element, as detailed in **Table IV.G-6**. Specifically, the Project would support the City's

policy to provide for safe passage of all modes of travel during construction by preparing a construction management plan that would identify the location of any temporary lane and sidewalk closures and provide for measures to maintain both directions of travel. The Project Site's location in Downtown Los Angeles is in close proximity to several bus routes provided by Metro, LADOT, Santa Monica Big Blue Bus, Orange County Transportation Authority, and Metro Rapid, as well as a Metro rail stop with direct access to two rail lines, all of which would provide residents, employees, and guests with various public transportation opportunities that would reduce vehicle miles traveled. The Project would provide enhancements to ensure a quality pedestrian environment along Hope Street and Pico Boulevard with new and additional street trees and landscaping and sidewalk paving elements. In addition, the Project would contribute to the City's policy to provide safe and convenient bicycle facilities by providing on-site short-term and long-term bicycle spaces. Additionally, given the location of the Project Site along and in close proximity to transit, the Project would provide residents, visitors, patrons, and employees convenient access to transit services.

(g) City Center Redevelopment Area Plan

The consistency of the Project with applicable goals in the City Center Redevelopment Area Plan is presented in **Table IV.G-8, Project Consistency with Applicable Goals of the Redevelopment Plan**, found in **Appendix N** of this Draft EIR.

The City Center Redevelopment Area Plan provides a framework for the redevelopment, rehabilitation, and revitalization of the City Center Redevelopment Area. The goals and objectives of the City Center Redevelopment Area Plan include eliminating blight and deterioration, allowing for accommodation of regional population growth, supporting economic development, and providing a well-designed environment. The Project would not conflict with the relevant policies that support the goals and objectives of the City Center Redevelopment Area Plan, as detailed in **Table IV.G-7**. The existing hotel, built in 1914, 88 years prior to the adoption of the City Center Redevelopment Area Plan in 2002, would be partially rehabilitated and expanded as part of a unified development which includes the hotel expansion and new construction of a residential tower. The existing hotel would adaptively reuse the now vacant, deteriorated property. The residential tower would provide needed housing in the City Center Redevelopment Area, while the partial rehabilitation and expansion of the hotel would support economic development in the City Center Redevelopment Area. Lastly, although the Project would request additional FAR, the requested FAR of 7.5:1 would be consistent with the additional allowed FAR on the Site.

(h) City of Los Angeles Municipal Code

(i) Permitted Uses

As discussed previously, the LAMC establishes the zoning for the Project Site as [Q]R5 (High Density Residential) with "Q" Qualified Conditions. Land uses allowed in the currently zoned R5 zone include most uses allowed in the R4, R3, R2, and R1 zones. As described in the LAMC, there are exceptions to allowable uses within each permitted zone. Generally, allowable uses include hotels, clubs or lodges, hospitals or sanitariums, accessory buildings, skilled nursing care

housing, and Alzheimer's/dementia care housing.¹⁴ Furthermore, pursuant to LAMC § 12.21 A.18, uses permitted in the C2 zone are permitted on lots zoned R5 within the Central City Community Plan area.

The Q Condition on the Project Site limits the permitted uses to: (i) residential uses permitted in the R5 Zone; (ii) hotels, motels, and apartment hotels; (iii) parking buildings, provided such parking is accessory to the main use of the lot; (iv) any other uses permitted in the C4 Zone within buildings which were in existence on the lot upon the effective date of this ordinance; (v) any other use permitted in the C4 Zone provided the floor area ratio of such use does not exceed 2:1; and (vi) any other uses permitted in the C4 Zone provided the development plan is approved by the City Planning Commission and California Redevelopment Agency. Thus, hotel, restaurant, and multi-family dwelling unit developments are permitted uses within the R5 Zone. The Project would be consistent with the [Q]R5-4D-O zoning as it is comprised of the adaptive reuse of an existing 46,626 square-foot SRO hotel, the expansion of the existing hotel with the new construction of an approximately 174,481 square-foot hotel, and the new construction of approximately 186,115 square-foot, mixed-use hotel and residential building. The Project would conform to the permitted setbacks on the Project Site, and although the Project would request additional FAR, the requested FAR of 7.5:1 would be consistent with the additional allowed FAR on the Project Site.

(ii) Adaptive Reuse Incentive Areas Specific Plan

The Project FAR would be consistent with the additional allowed FAR on the Project Site and the Project does not include any requested density bonuses pursuant to the Adaptive Incentive Areas Specific Plan.

(iii) Los Angeles Green Building Code

The Project would not conflict with the Los Angeles Green Building Code (LA Green Building Code), which imposes more stringent green building requirements than those contained within the California Green Building Standards Code (CALGreen), and is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for residential and non-residential developments including measures that would increase energy efficiency on the Project Site, such as installing Energy Star rated appliances and water-conserving fixtures.

The Project would include energy efficient elevators, low-flow faucets, shower heads, and toilets in all bathrooms, energy efficient mechanical systems, energy efficient glazing and window frames, energy efficient lighting, and appropriate landscaping, which would reduce water use by at least 50 percent. Expected future water use of the Project is discussed, along with specific water saving commitments of the Project, in the Water Supply Assessment (WSA) prepared and

¹⁴ LAMC Section 12.12.A.

approved by LADWP.¹⁵ (See **Section IV.M, Utilities and Service Systems – Water**, of this Draft EIR, for additional information regarding the Project's water use.)

Also, pursuant to CALGreen and the LA Green Building Code, the Project would use low-VOC paints, coatings, adhesives, and sealants indoors to the maximum extent feasible. Furthermore, controls would be installed to ensure that energy use and indoor environmental air quality are maintained over time. (See **Section IV.A, Air Quality**, of this Draft EIR, for additional information regarding air quality and **Section IV.C, Energy**, of this Draft EIR, for additional information regarding energy use.) Additionally, the Project would provide long- and short-term bicycle parking and EV charging spaces.

(iv) Citywide Design Guidelines

The Project's consistency with applicable objectives in the Citywide Design Guidelines is presented in **Table IV.G-9, Consistency with Applicable Objectives of the Citywide Design Guidelines**, found in **Appendix N** of this Draft EIR. The Project would not conflict with the objectives of the Citywide Design Guideline's main principles: 360-degree design, pedestrian-first design, and climate-adapted design. The Project would not conflict with the 360-degree design principle, as it has been designed to partially rehabilitate the existing Morrison Hotel, built in 1914, while expanding and constructing a new building on the block in a contemporary architectural style. As the Project is located within the South Park area of Downtown Los Angeles, the Project buildings have been designed to be compatible with the urban nature of the existing community, which includes new and old industrial, residential, and general commercial uses in buildings varying from one level to skyscrapers. Although the Project is comprised of two buildings, the articulation of each of the buildings serves to resemble multiple buildings with heights that step down toward Hope Street. The design of the Project building facades alternates between different textures, colors, materials, and distinctive architectural treatments. The Project would not conflict with the pedestrian-first design principle by improving the pedestrian environment on the Project Site by maintaining a 12-foot sidewalk width, installing new sidewalks and landscaping, and providing for separation between pedestrian and vehicular areas. The Project height would step back from the corner of Hope Street and Pico Boulevard, with the Hotel Expansion and Hotel/Residential Tower located to the east and northeastern portions of the Project Site. The Project would not conflict with the climate-adapted design principle by planting additional street trees, and complying with the Los Angeles Green Building Code, which builds upon and sets higher standards than those incorporated in CALGreen, including a minimum capability of 20 percent electrical vehicle charging. The Project also would provide space for future photovoltaic and solar thermal collectors.

¹⁵ Los Angeles Department of Water and Power, Water Supply Assessment – Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020. See **Appendix H.2** of this Draft EIR.

(v) *Downtown Design Guide, Urban Design Standards and Guidelines*

The Project's consistency with applicable objectives in the Downtown Design Guide is presented in **Table IV.G-10, Consistency with Applicable Objectives of the Downtown Design Guide**, found in **Appendix N** of this Draft EIR. The Project would not conflict with the applicable objectives of the Downtown Design Guide. The Project Site is currently occupied with commercial industrial buildings and a vacant hotel. The Project would develop a mixed-use project including hotel and commercial uses and 136 residential units in the dense urban community of the South Park area in Downtown Los Angeles, in close proximity to rail and bus services within walking distance. The Project would also support walkability by maintaining the existing pedestrian walkways along Hope Street and Pico Boulevard.

(i) *Conclusion*

As discussed above, the Project would not conflict with the City's General Plan, Central City Community Plan, Los Angeles Municipal Code, City Center Redevelopment Plan, Citywide Design Guidelines, Downtown Design Guidelines, or any other plans or policies adopted to avoid or reduce environmental impacts. **Therefore, Project-level impacts related to land use plans for this Project would be less than significant.**

(2) Mitigation Measures

The Project would not result in significant Project-level land use and planning impacts. Therefore, no mitigation measures are recommended.

(3) Level of Significance After Mitigation

Project-level impacts related to land use from the Project would be less than significant.

e) Cumulative Impacts

(1) Impact Analysis

As indicated in **Section III, Environmental Setting**, of this Draft EIR, there are 172 Related Projects that are planned or are under construction in the Draft EIR study area. The Related Projects generally consist of infill development and redevelopment of existing uses and the cumulative project uses include residential, commercial and office uses. Of the 172 Related Projects, there are 6 projects (Related Project Nos. 41, 43, 59, 70, 78, 111, and 172) within close proximity (within a one-block radius) of the Project Site. These Related Projects consist of hotel, office, and mixed uses comprised of residential, retail, and restaurant uses. As with the Project, the Related Projects would be required to comply with relevant land use policies and regulations. In addition, as discussed in **Section VII (Impacts Not Found to be Significant)**, and in the Initial Study (**Appendix A**), the Project would not physically divide an established community, as the Project would be built on five contiguous lots within the boundaries of the Project Site as it currently exists, developed with two commercial buildings and a vacant hotel building and bound

by streets and an alley on three sides. Therefore, the Project would not contribute to any potentially significant cumulative impacts as the Project would not divide an established community nor contribute to any project which could divide an established community. As demonstrated above, the Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental impact. The Project would be consistent with zoning standards with approval of the requested entitlements, and thus the Project would not incrementally contribute to cumulative conflicts or inconsistencies with respect to applicable land use plans and zoning standards. This concentration of a mix of land uses in the Downtown urban core and in proximity to walkable spaces and transit, within areas of existing infrastructure and services, would further the goals of several land use plans for smart growth, resulting in a land use pattern that would not conflict with policies for reducing air pollution, greenhouse gas emissions, and vehicle miles travelled. In addition, as discussed above, as the Project would not conflict with either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and relevant environmental policies. **Therefore, cumulative impacts with regard to land use consistency would be less than significant and would not be cumulatively considerable.**

(2) Mitigation Measures

The Project would not result in significant Project-level or cumulative land use and planning impacts. Therefore, no mitigation measures are recommended.

(3) Level of Significance After Mitigation

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