Appendix D

Land Use Tables

Appendix D

Land Use Tables

Table 1
Applicable Goals, Principles, and Strategies of SCAG's Regional Transportation Plan/Sustainable
Communities Strategy

2020-2045 RTP/SCS Goals, Principles, and **Strategies Would the Project Conflict?** Goal 2: Improve mobility, accessibility, reliability, No Conflict. The Project would support and would not and travel safety for people and goods. conflict with these regional goals, as the Project would be developed in an existing urbanized area with an Goal 4: Increase person and goods movement established network of roads and freeways, and transit, and travel choices within the transportation that provide local and regional access, including to the system. Project Site. The Project area is located two blocks from the 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network. availability and accessibility of public transit in the Project area is documented by the Project Site's location within a TPA¹ and a SCAG-designated HQTA.^{2,3} addition, the Project would provide 251 bicycle spaces. The Project would also meet the City Green Building Code Requirements for parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Given the Project's location in proximity to a variety of transportation options, the Project would improve mobility, accessibility, and overall productivity of the transportation system by providing residents, employees, and visitors with opportunities and choices for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with these goals.

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The City's ZIMAS System (http://zimas.lacity.org/) confirms the location of the Project Site within a Transit Priority Area. See Zoning Information File No. 2452 and Parcel Profile Reports for 609 and 625 W. 8th Street and 754 S. Hope Street.

SCAG 2020–2045 RTP/SCS, p. 77, Exhibit 3.8: Priority Growth Areas—High Quality Transit (2045). The RTP/SCS defines HQTAs 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.

Metro, High Quality Transit Areas—Southwest Quadrant map.

2020-2045 RTP/SCS Goals, Principles, and **Strategies** Would the Project Conflict? Goal 3: Enhance the preservation, security, and No Conflict. The Project would support and would not resilience of the regional transportation system. conflict with this regional goal. As discussed in Section IV.G, Transportation, of this Draft EIR, the Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system; VMT; and hazardous geometric design features. As discussed above, during construction per Project Design Feature TR-PDF-1, a Construction Management Plan and Worksite Traffic Control Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site. Appropriate construction traffic control measures would be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. During operation, the Project would not substantially increase hazards due to a geometric design feature or incompatible Therefore, the Project would not adversely affect the security and resilience of the regional transportation system, and the Project would not conflict with these goals. No Conflict. As evaluated in Section IV.A, Air Quality, Goal 5: Reduce greenhouse gas emissions and of this Draft EIR, the Project would result in less-thanimprove air quality. significant impacts related to air quality during Goal **6:** Support healthy and equitable construction and operation. As described in Section communities. IV.C, Greenhouse Gas Emissions, of this Draft EIR (Project Design Feature GHG-PDF-1), the Project would Goal 7: Adapt to a changing climate and incorporate the use of Energy Star-labeled products and support an integrated regional development appliances; use of light-emitting diode (LED) lighting or pattern and transportation network. other energy-efficient lighting technologies to reduce electricity use, and fenestration designed for solar orientation. The Project would also further support and promote environmental sustainability by complying with regulatory requirements and, pursuant to Project Design Feature GHG-PDF-1. LEED-certified or equivalent green building standards. These features include, but would not be limited to: environmentally-friendly materials, such as non-toxic paints and recycled finish materials; and passive shading for indoor spaces, increased natural daylighting, and natural ventilation via fully-operable balcony doors and windows. While these measures are intended to reduce GHG emissions, they would also improve air quality. The Project would be developed within an existing urbanized provides established area that an transportation network of roads, freeways, and transit that provide local and regional access to the area,

including the Project Site. Specifically, the Project would

2020–2045 RTP/SCS Goals, Principles, and Strategies	Would the Project Conflict?
	include a mixed-use development consisting of residential units and commercial/retail/restaurant uses within a SCAG-designated HQTA. As discussed above, the Project area is located two blocks from the 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network. The Project would also promote bicycle use by providing 251 bicycle spaces. In addition, the Project would enhance pedestrian activity on and around the Project Site by siting retail and restaurant uses on the ground level, which would serve to activate the streets and promote walkability for the community. As such, the Project would support the reduction of vehicle miles traveled and dependency on single-occupancy vehicles. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel.	
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. As discussed above, the Project would introduce a mixed-use development with a range of unit types in a HQTA well-served by multiple transportation options. Specifically, the Project would provide 580 new multi-family residential units, consisting of 108 studios, 258 one-bedroom units, 66 one-bedroom units with dens, 143 two-bedroom units, and five two-bedroom with den or three-bedroom units. The Project would also provide 251 bicycle parking spaces within the Project Site to serve the proposed residential and commercial uses. In addition, the Project would encourage walking and enhance pedestrian activity on and around the Project Site by siting retail and restaurant uses on the ground level and including landscaping and streetscape improvements. As such, the Project would provide opportunities for the use of alternative modes of transportation, thereby providing a range of housing unit types in an area supported by multiple transportation options. Therefore, the Project would not conflict with

2020–2045 RTP/SCS Goals, Principles, and Strategies	Would the Project Conflict?
	this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	No Conflict. As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project Site is located in an urbanized area and is currently occupied by a surface parking lot and a low-rise parking structure. No vegetation is present on-site, no riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Therefore, the Project would not conflict with this goal.
Principle 2: Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system. Principle 3: Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	No Conflict. As discussed above under Goals 2, 6, and 7, the Project would be developed in an existing urbanized area with an established network of roads and freeways, and transit, that provide local and regional access, including to the Project Site. The Project area is located two blocks from the 7th Street/Metro Center Rail Station and is a hub of the regional rail network. The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a TPA and a SCAG-designated HQTA. Given the Project's location in proximity to a variety of transportation options, the Project would improve mobility, accessibility, and overall productivity of the transportation system by providing residents, employees, and visitors with opportunities and choices for the use of alternative and sustainable modes of transportation, including convenient access to public transit and opportunities for walking and biking in the community. Therefore, the Project would not conflict with these principles.
Principle 4 : Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	No Conflict. The Project would construct a mixed-use development consisting of residential units and commercial/retail/restaurant uses within a SCAG-designated HQTA. As discussed above, the Project area is located two blocks from the 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is a hub of the regional rail network. The Project would also promote bicycle use by providing 251 bicycle spaces. In addition, the

2020–2045 RTP/SCS Goals, Principles, and Strategies	Would the Project Conflict?
	Project would enhance pedestrian activity on and around the Project Site by siting retail and restaurant uses on the ground level, which would serve to activate the streets and promote walkability. As such, the Project would support the reduction of vehicle miles traveled and dependency on single-occupancy vehicles. As such, the Project would not conflict with this principle.
Principle 5: Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	No Conflict. As discussed under Goals 5 and 7 above, the Project would result in less-than-significant impacts related to air quality during construction and operation. In addition, pursuant to Project Design Feature GHG-PDF-1, the Project would incorporate the use of Energy Star-labeled products and appliances; use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies to reduce electricity use, and fenestration designed for solar orientation. The Project would also further support and promote environmental sustainability by complying with regulatory requirements and LEED-certified or equivalent green building standards. These features include, but would not be limited to: environmentally-friendly materials, such as non-toxic paints and recycled finish materials; and passive shading for indoor spaces, increased natural daylighting, and natural ventilation via fully-operable balcony doors and windows. While these measures are intended to reduce GHG emissions, they would also improve air quality. Therefore, the Project would not conflict with this principle.
 Strategy: Focus Growth Near Destinations & Mobility Options Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets Plan for growth near transit investments and support implementation of first/last mile strategies Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in 	No Conflict. As discussed above, the Project Site is located within a SCAG-designated HQTA and is located two blocks from the 7th Street/Metro Center Rail Station, which and is a hub of the regional rail network. The Project would construct an infill development replacing a low-rise four-story parking structure and a surface parking lot. The Project would provide housing and jobs by developing 580 residential units and 7,499 square feet of commercial/retail/restaurant uses. The provision of 251 bicycle spaces and an improved pedestrian environment, due to the siting of retail and restaurant uses on the ground level, would activate the streets and promote walkability and alternative transportation in the Downtown area. As such, the Project would serve to provide growth near destinations and mobility options. Refer to the SCAG goals above for further details. The Project would therefore not conflict with this land use strategy.

2020–2045 RTP/SCS Goals, Principles, and Strategies	Would the Project Conflict?
 existing neighborhoods Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart 	
 Strategy: Promote Diverse Housing Choices Preserve and rehabilitate affordable housing and prevent displacement Identify funding opportunities for new workforce and affordable housing development Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions 	would also be located in proximity to numerous transit choices and the provision of 251 bicycle parking and an improved pedestrian environment would encourage alternative modes of transportation and, thus, the
Strategy: Leverage Technology Innovations Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system	No Conflict. The Project would meet the City's electric vehicle requirements to provide parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the parking spaces in the Project would be capable of supporting future electric vehicle supply equipment (EVSE). Additionally, 10 percent of spaces are required to have EV charging stations. As discussed above, the Project would incorporate the use of Energy Star–labeled products and appliances; use of light-

Strategy: Support Implementation **Sustainability Policies**

for storing transit and other multi-modal

• Identify ways to incorporate "micro-power

grids" in communities, for example solar

energy, hydrogen fuel cell power storage and

Pursue funding opportunities to support local

emitting diode (LED) lighting or other energy-efficient lighting technologies to reduce electricity use, and fenestration designed for solar orientation. The Project would also further support and promote environmental sustainability by complying with regulatory requirements and LEED-certified equivalent green building standards. These features include, but would not be limited to: environmentally-friendly materials, such as non-toxic paints and recycled finish materials; and passive shading for indoor spaces, increased natural daylighting,

power generation

payments

2020–2045 RTP/SCS Goals, Principles, and Strategies	Would the Project Conflict?
sustainable development implementation projects that reduce greenhouse gas emissions Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region Continue to support long range planning efforts by local jurisdictions Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	and windows. In addition, pursuant to Project Design Feature WAT-PDF-1, the Project would use watersaving pool filters, pool/spa recirculating filtration
Source: Eyestone Environmental, 2021.	

Table 2

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

Land Use Chapter

Section 2. Issue One: Distribution of Land Use

Goals/Objective/Policy

Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality. enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.

Policy 3.1.3: Identify areas for establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.

No Conflict. As discussed in Section II, Project Description, of this Draft EIR, the existing Project uses include a low-rise four-level parking structure and a surface parking lot that is entirely paved. The Project would replace these existing uses with a 50-story mixeduse building, including 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. The Project would be developed with sustainability features and landscaped open space and recreational areas for residents. In addition, the Project would provide public landscaping and sidewalk designs to

Would the Project Conflict?

improve pedestrian travel. The Project Site is also transit accessible and is in close proximity to many bus transit lines, rail lines, and shuttle services made available by the Los Angeles Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and other transit providers. As such, the Project would contribute to the City's vision of a more livable city with adequate infrastructure, alternative transportation, reduced congestion, and improved air quality. The Project would support the needs of existing and future residents, businesses, and visitors in a transitoriented mixed-use neighborhood of the City. Therefore,

the Project would not conflict with this goal and objective.

No Conflict. The Project would support and not conflict with this City policy. As discussed in Section IV.F, Public Services (i.e., Section IV.F.1, Public Services—Fire Protection; Section IV.F.2, Public Services-Police Protection; Section IV.F.3, Public Services—Libraries) and Section IV.I, Utilities and Service Systems (i.e., Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure; Section IV.I.2, Utilities and Service Systems-Energy Infrastructure), of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, the agencies providing public services and utilities to the Project Site would have the capacity to Therefore, the Project would not serve the Project. conflict with this policy.

No Conflict. The Project would support and not conflict with this City policy by providing a variety of open space areas within the Project Site, including recreational amenities for residents and on-site landscaped areas for visitors. The Project would provide approximately 65,193 square feet of total open space. Specifically, the Project would provide a number of indoor and outdoor common open space areas and recreational amenities, including

Goals/Objective/Policy	Would the Project Conflict?
	13,140 square feet of indoor open space and 15,358 square feet of outdoor open space, and 8,596 square feet of outdoor covered open space. In addition, the Project would provide 28,100 square feet of private balcony space. The common open space elements of the Project would be provided in a tiered terrace arrangement in several locations throughout the vertical levels of the building, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. The Project would also provide a dog run and pet amenity area on Level 3 that would not be counted toward open space. Pursuant to LAMC Section 12.21-A,2, the Applicant requests a Zoning Administrator's Interpretation to clarify that 1) covered exterior open space areas can be credited to the common open space requirement for the Project and 2) that at the same time, the covered open space areas provided within the building cut-outs of the Project are not considered "floor area" as defined by the LAMC. The Project would remove street trees adjacent to the Project Site as part of construction and would plant a row of street trees along 8th Street, Hope Street, and Grand Avenue. Therefore, the Project would not conflict with this policy.
Policy 3.1.4: Accommodate new development in accordance with land use and design provisions of the General Plan Framework Long-Range Land Use Diagram and Table 3-1.	No Conflict. The Long-Range Land Use Diagram shows that the Project Site is within the Downtown Center. The Long-Range Land Use Diagram describes the Downtown Center as an international center for finance and trade that serves the population of the five-county metropolitan region. In addition, the Long-Range Land Use Diagram identifies downtown Los Angeles as the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Los Angeles Convention Center. Furthermore, it describes the Downtown Center as generally characterized by a floor area ratio of up to 13:1 and high rise buildings. As discussed in Section II, Project Description, of this Draft EIR, the Project would consist of a 50-story residential tower, consisting of 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. In total, the Project

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goals/Objective/Policy	Would the Project Conflict?
	would include up to 554,927 square feet of developed floor area, which would result in a total FAR of up to 9.25:1. Therefore, the Project is within the acceptable FAR limit in the Downtown Center. Furthermore, the Metro 7th Street/Metro Center Rail Station, which is a regional transportation hub, is accessible approximately two blocks north of the Project Site. As such, the Project would create additional housing to meet a growing demand in the Downtown Center, provide short- and long-term employment opportunities, and would be consistent with the type of development that is envisioned for the Downtown Center in the General Plan Framework. Therefore, the Project would not conflict with this policy.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	No Conflict. The Project is located in a transit-rich neighborhood serviced by Metro, LADOT, and other transit providers. Specifically, the Project is located approximately two blocks from the 7th Street/Metro Center Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. The Project Site and vicinity are currently served by a total of seven local and inter-city transit operators. Metro operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the Project area. Additional transit lines within the Study Area include nine LADOT Commuter Express lines, five LADOT Downtown Area Short Hop (DASH) bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. In addition, the Project would provide 251 bicycle parking stalls onsite to encourage non-motorized transportation, and the Project's close proximity to nearby retail, restaurants, and jobs would also promote pedestrian accessibility to these uses. Therefore, the Project would promote the reduction of vehicle trips, vehicle miles traveled, and air pollution, and would not conflict with this objective and policy.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.	No Conflict. The Project Site is located in a urbanized area in the jobs and transit rich Downtown Center, and is surrounded by commercial, office, retail, restaurant, multi-family residential, and parking uses. The Project would replace the existing parking structure and surface parking lot with a mixed-use 50-story building that would provide new residential units and neighborhood-serving commercial/retail/restaurant uses that would be similar to and compatible with the mix of land uses surrounding the

Goals/Objective/Policy	Would the Project Conflict?
	Project Site. In addition, the Project would focus the proposed high-density, mixed-use development along a commercial corridor that is characterized by a high degree of pedestrian activity. The Project would be designed in a modern-style and would be integrated into the 8th Street frontage. Furthermore, the proposed building is similar in scale to nearby developments, including, but not limited to, the 73-story Wilshire Grand Center at the northwestern corner of Figueroa Street and 7th Street, the 53-story mixed-use tower project at 820/826 S. Olive Street, the 31- and 40-story mixed use towers project at 1200 S. Flower Street, and the 52-story tower at 777 S. Figueroa Street. Therefore, the Project would be consistent with the scale and character of the surrounding uses, and would enhance the character of the surrounding commercial district and not conflict with this policy.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	No Conflict. As detailed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Project's population and employment growth would be well within SCAG's projections for the Subregion, which serve as the basis for the General Plan Framework's demographics projections and planned provisions of transportation and utility infrastructure and public services. As discussed in Objective 3.2 above, the Project would be located in an area well-served by public transit, including four Metro rail lines and numerous local and regional commuter bus lines. In addition, as discussed in Section IV.F, Public Services (Fire Protection, Police Protection, Libraries), and Section IV.I, Utilities and Service Systems (Water Supply and Infrastructure; Energy Infrastructure), of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this objective.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	No Conflict. The Project would replace an existing parking structure and surface parking lot with a new mixed-use development within the Downtown Center along primary transit corridors/boulevards. As such, the Project would be compatible with the surrounding area and would conserve existing neighborhoods and related districts. See also Objectives 3.1 and Policy 3.2.4. Therefore, the Project would not conflict with this objective.
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority	No Conflict. See Policy 3.1.4 for a discussion of the Project's location within the Downtown Center, Objective 3.2 for a discussion of the Project's location in an area well-

Applicable Goals, Objectives, and I offices of the General Flam Framework Element	
Goals/Objective/Policy	Would the Project Conflict?
of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	served by public transit, and Policy 3.2.4 for a discussion of the Project's location within an area occupied by buildings of the same scale and character as those proposed by the Project. The Project would not conflict with this policy.
Land Use Chapter	
Section 3. Issue Two: Uses, Density, Charac	teristics—Multi-Family Residential
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents. Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	No Conflict. The Project would provide 580 multi-family residential units as well as open space and recreational amenities for use by Project residents. As discussed above, the Project would contribute to growth in an area where there is sufficient public infrastructure. Residents of the Project and surrounding multi-family neighborhoods would be provided streetscape improvements and new retail and restaurant use opportunities that would enhance quality of life. See Policy 3.1.2, Objective 3.3 for a discussion of sufficient public infrastructure and Policy 3.2.4 for a discussion of enhancement to the character of the existing commercial district. Therefore, the Project would not conflict with this goal and objective.
Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indication in Table 3-3, with density permitted for each parcel to be identified in the community plans.	No Conflict. The Project Site is designated as Regional Center Commercial based on the Central City Community Plan and is zoned C2-4D (Commercial, Height District No. 4 with Development Limitation). As permitted, the Project would introduce new multi-family residential units and commercial/retail/restaurant uses in an area primarily developed with residential and commercial uses. As the Project Site is within the Greater Downtown Housing Incentive Area, per LAMC Section 12.22-C,3(c), the maximum number of dwelling units is not limited by the lot area. Pursuant to the Community Plan, a FAR of up to 13:1 would be allowed with an approved Transfer of Floor Area Rights (TFAR). Therefore, the Greater Downtown Housing Incentive Area's elimination of a density maximum and the Project's TFAR request would allow for the requested density and FAR of 9.25:1, and the Project would not conflict with this policy.
Policy 3.7.4 : Improve the quality of new multifamily dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter.	No Conflict. The Project is an infill redevelopment that would replace an existing parking structure and surface parking lot with a new residential tower with ground floor neighborhood-serving commercial/retail/restaurant uses. The Project would result in an improved and aesthetically

Goals/Objective/Policy	Would the Project Conflict?
	appealing streetscape that would promote pedestrian activity and enhance the urban lifestyle and livability of the neighborhood. See Goal 5A, Objective 5.8, and Objective 5.9 further below in this table under the Framework Element's Urban Form and Neighborhood Design Chapter. Therefore, the Project would not conflict with this policy.
Land Use Chapter Section 3. Issue Two: Uses, Density, Charac	teristics—Downtown Center
Goal 3G: A Downtown Center as the primary economic, governmental, and social focal point of the region with an enhanced residential community. Objective 3.11: Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.	No Conflict. The Project would introduce 580 new multifamily residential units and commercial/retail/restaurant uses in a 50-story building with a podium and vertical tiers that offer landscaping, open space, and recreational amenities to Project residents within the Downtown Center. The high-rise building would have a contemporary and unique design and would introduce density and scale to a site currently occupied by a low-rise parking structure and surface parking lot. In addition, the Project would be located approximately two blocks from the 7th Street/Metro Center Rail Station which would be in a location that allows the Project's occupants to utilize the transit hub, which not only provides connections within the Downtown Center but also connects to the greater Los Angeles area. See Policy 3.2.4 for a detailed discussion of scale and design. Therefore, the Project would not conflict with this goal and objective.
Housing Chapter	
Goal 4A : An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.	No Conflict. The Project would support and not conflict with this Citywide goal by providing different housing unit types at various costs through the development of 580 new multi-family residential units, consisting of 108 studios, 258 one-bedroom units, 66 one-bedroom units with dens, 143 two-bedroom units, and five two-bedroom with den or three-bedroom units. Therefore, the Project will not conflict with this goal.
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	No Conflict. The Project would support and would not conflict with this subregional objective by providing 580 new multi-family residential units of various types on a site that currently provides only off-street parking. Therefore, the Project would not conflict with this objective.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between	No Conflict. As discussed in Objective 3.2 above, the Project would be located in an area well-served by public transit. The 7th Street/Metro Center Rail Station is located approximately two blocks from the Project Site, and numerous bus lines, including local and rapid lines,

Goals/Objective/Policy	Would the Project Conflict?
higher-density developments and surrounding lower-density residential neighborhoods.	are located within the Project vicinity. As such, the Project would provide much needed new multi-family housing in a Transit Priority Area (TPA) ⁴ and a High-Quality Transit Area (HQTA). ^{5,6} The proposed new multi-family housing would be located within a high activity area in the Downtown Center. Therefore, the Project would not conflict with this objective.
Urban Form and Neighborhood Design Chapt	er
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	No Conflict. The Project would be developed in the Downtown Center within an area well-served by public transit. As discussed in Objective 3.2 above, the Project Site is located approximately two blocks from the 7th Street/Metro Center Station, a regional transportation hub that includes the Metro Red, Purple, Blue, and Expo lines. In addition, the Project Site is currently served by a number of local and rapid bus lines that serve City and greater Los Angeles area. Therefore, the Project would not conflict with this objective.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	No Conflict. As a development within the Downtown Center and on a site designated as Regional Center Commercial, the Project would provide an improved and aesthetically appealing streetscape that would promote pedestrian activity. Specifically, the Project would provide ground floor commercial/retail/restaurant uses that would feature extensive windows and continuous balconies situated 25 feet above grade to activate the street and sidewalk and introduce a human-scale element and visual interest to pedestrians, visitors, and occupants. In addition, the Project would promote walkability by encouraging the use of public transit since the Project Site is near many transit options, particularly the 7th Street/Metro Center Station located two blocks north of the Project Site. Along with nearby commercial uses, such as the BLOC and the FIGat7th shopping areas, and nearby entertainment destinations to the south at L.A. Live, the Project would contribute to the

The City's ZIMAS System (http://zimas.lacity.org/) confirms the location of the Project Site within a Transit Priority Area. See Zoning Information File No. 2452 and Parcel Profile Reports for 609 and 625 W. 8th Street and 754 S. Hope Street.

⁵ SCAG 2020–2045 RTP/SCS, Exhibit 3.8: Priority Growth Areas—High Quality Transit (2045). The RTP/SCS defines HQTAs 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.

⁶ Metro, High Quality Transit Areas, Southwest Quadrant map. This map shows HQTAs within the southwestern quadrant of the SCAG region.

Goals/Objective/Policy	Would the Project Conflict?
	establishment of a strong pedestrian orientation to reinforce this portion of the Downtown Center as a focus for activity and investment in the community. Therefore, the Project would not conflict with this objective.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	No Conflict. The Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, as detailed in Section IV.F.2, Public Services—Police Protection, of this Draft EIR. As set forth in Project Design Feature POL-PDF-2, the Project would include private on-site security, a closed circuit security camera system, and keycard entry for residential areas. Lighting of building entries and walkways would provide for pedestrian orientation and allow clear identification of secure routes between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3. Project Design Feature POL-PDF-4 would provide for sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. As specified in Project Design Feature POL-PDF-6, prior to the issuance of a building permit, the Project Applicant will submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. In addition, pursuant to Project Design Feature POL-PDF-7, prior to the issuance of a building permit, the Project applicant will consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project. Therefore, this Project would not conflict with this objective.
Open Space and Conservation Chapter	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.	No Conflict. The Project would contribute to the open space system, and would not conflict with this goal, by providing open space and recreational amenities for Project residents. The Project would provide a number of indoor and outdoor common open space areas and recreational amenities, including 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, 8,596 square feet of outdoor covered open space, and 28,100 square feet of private balcony space. Specifically, the Project would provide indoor and outdoor common open space in a tiered terrace arrangement, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas,

Goals/Objective/Policy	Would the Project Conflict?
	seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. These proposed open spaces would be provided onsite and privately managed. In addition, the development is located within an existing developed parcel that would not be threatened by encroachment from other land uses. Therefore, the Project would not conflict with this goal.
Objective 6.3: Ensure that open space is managed to minimize environment risks to the public.	No Conflict. The residential portion of the Project would offer privately-managed open space and recreational amenities that would be available to residents. Therefore, the Project would support the reduction of the demand on parks and recreational facilities in the vicinity of the Project Site. The Project would minimize environmental risks to the public by providing safe onsite open space amenities that would not pose environmental risks to the public and would not conflict with this objective.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	No Conflict. The Project would include up to 7,499 square feet of commercial retail and restaurant uses, which would generate new employment opportunities and encourage new pedestrian activity onsite and along the street segments surrounding the Project Site. The Project location would also encourage residents and employees to patronize local businesses in Downtown. The Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality. Therefore, the Project would not conflict with this objective.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	No Conflict. The Project includes a new commercial component and is located in an area well-served by public transit, including four Metro rail lines and numerous local and regional bus lines. Thus, the Project Site would have access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality. Therefore, the Project would not conflict with this policy.

Goals/Objective/Policy	Would the Project Conflict?
Infrastructure and Public Services Chapter	
Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.	No Conflict. The Project would support and would not conflict with this Citywide goal. As described in the Initial Study included as Appendix A of this Draft EIR, Project construction activities would occur in accordance with City grading permit regulations and National Pollutant Discharge Elimination System (NPDES) requirements to minimize the discharge of pollutants in stormwater runoff. Wastewater generated during Project operation would be collected and discharged into existing sewer mains and conveyed to the Hyperion Treatment Plant (HTP), which has an available treatment capacity of approximately 175 million gallons per day. The wastewater generated by the Project would be typical of commercial and residential uses. No industrial discharge into the wastewater system would occur. As the HTP is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. Therefore, the Project would not conflict with this goal.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. As discussed in the Project's Initial Study, which is included as Appendix A of this Draft EIR, Project construction activities would occur in accordance with City grading permit regulations and NPDES requirements to minimize the discharge of pollutants in stormwater runoff. The Project would implement best management practices (BMPs) during operation in compliance with the Low Impact Development Ordinance. The Project would provide on-site filtration and infiltration drywells to minimize the discharge of pollutants in stormwater runoff. The Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site; or substantially increase runoff to result in flooding during construction and operation. Therefore, the Project would not conflict with this policy.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations. Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	No Conflict. Refer to Policy 9.3.1 of the Infrastructure and Public Services Chapter, above. As discussed in the Project's Initial Study, which is included as Appendix A of this Draft EIR, the Project would not increase the quantity of stormwater runoff, and the Project would not alter the existing drainage pattern of the site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. In addition, the Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. The Project Site is located within an area designated as FEMA Zone X, which denotes an area where potential for flooding is minimal.

Table 2 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Goals/Objective/Policy	Would the Project Conflict?
	The Project would not conflict with this goal and objective.
Goal 9C: Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses. Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	No Conflict. As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the Project's Water Supply Assessment and LADWP's demand projections provided in its 2015 Urban Water Management Plan, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with this policy.
Goal 9F: Adequate collection, transfer and disposal of mixed solid waste—the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner than minimizes adverse environmental impacts.	No Conflict. As discussed in the Initial Study, which is included as Appendix A of this Draft EIR, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. Based on the above, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, the Project would not conflict with this goal.
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	No Conflict. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting would also be used to highlight signage, architectural features, and landscaping elements throughout the Project Site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting that would minimize light trespass from the Project Site. In addition, the Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. Project lighting would meet all applicable standards of this goal and the LAMC (e.g., Sections 17.08, 12.21-A,5(k), 93.0117) and would adhere to the streetscape lighting standards as established by the Bureau of Street Lighting and Downtown Design Guide. Therefore, the Project would not conflict with this goal.
building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution,	lighting that would minimize light trespass from the Project Site. In addition, the Project would not include electronic signage or signs with flashing, mechanical, of strobe lights. Project lighting would meet all applicable standards of this goal and the LAMC (e.g., Section 17.08, 12.21-A,5(k), 93.0117) and would adhere to the streetscape lighting standards as established by the Bureau of Street Lighting and Downtown Design Guide

Table 3

Applicable Policies of the Mobility Plan 2035

Mobility Plan 2035

Policy 1.1 Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.

Goals/Objective/Policy

No Conflict. Under existing conditions, there are four driveways: one curb cut along Grand Avenue, two curb cuts along 8th Street, and one curb cut along Hope Street. The Project would provide a total of two driveways—one along Hope Street and one along Grand Avenue—and would eliminate the two existing driveways along 8th Street. As such, with the reduction of curb cuts, the Project would provide continuity of the existing sidewalks and improve the safety of pedestrians traveling along 8th Street adjacent to the Project Site. Vehicular access to the Project Site for residents would be provided on Hope Street and Grand Avenue. Service, delivery, and trash collecting vehicles would access the Project Site from Hope Street and would exit the Project Site to Grand Avenue. Visitors, taxis, and rideshare vehicles would utilize the Hope Street or Grand Avenue access points for internal loading and drop-off at the on-site porte cochère thereby reducing conflicts with pedestrians and roadway users. In addition, visitors and guests within the Project Site would be able to travel from one end of the building to the other via the porte cochère and lobby without exiting In addition, the Project would design entrances/exits and pedestrian walkways with pedestrian safety features to reduce areas of concealment such that

visibility would be maximized between vehicles and pedestrians. All driveways would be designed to LADOT standards and would be approved by LADOT. Therefore,

the Project would not conflict with this policy.

Would the Project Conflict?

Policy 1.6 Multi-Modal Detour Facilities: Design detour facilities to provide safe passage for all modes of travel during times of construction.

Conflict. discussed in Section As Transportation, of this Draft EIR, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction would require a temporary closure of the parking/turn lane on Grand Avenue and 8th Street immediately adjacent to the Project Site, as well as a potential temporary closure on Hope Street immediately adjacent to the Project Site. However, a Construction Traffic Management Plan and Worksite Traffic Control Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 set forth in Section IV.G, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Therefore, the Project would provide safe passage for all modes of travel

Goals/Objective/Policy	Would the Project Conflict?
	during construction and would not conflict with this policy.
Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	No Conflict. One of the primary objectives of the Project is to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses. Streetscape amenities provided by the Project would include a row of street trees along 8th Street, Hope Street, and Grand Avenue as well as pedestrian-scale lighting fixtures and landscaping. Residents on foot would access the residential lobby on the ground floor directly from 8th Street and Grand Avenue. The residential lobby is designed to share space with a commercial/retail/ restaurant uses located at the corner of 8th Street & Grand Avenue, with pedestrian access from Grand Avenue. The commercial/retail/restaurant space located at the corner of 8th Street & Hope Street would have two access points, one from Hope Street and one from 8th Street. In addition, the Project's close proximity to nearby retail, restaurants and shopping centers would serve to activate the street and promote walkability. Vehicular access to the Project Site for residents would be provided on Hope Street and Grand Avenue. Residents can directly access elevators and stairways that serve the entire building from each parking level. Service, delivery, and trash collecting vehicles would access the Project Site from Hope Street and would exit on Grand Avenue. An on-site porte cochère would be located in the center of the Project Site for pick-up and drop-off. Visitors, taxis, and rideshare vehicles would enter the Project Site from either Hope Street or Grand Avenue, access the porte cochère, and exit via Grand Avenue. As such, vehicular loading and drop-off would occur within the building's parking structure, and the Project's site planning would provide a safe and comfortable walking environment. Therefore, the Project would not conflict with this policy.
Policy 2.4 Neighborhood Enhanced Network: Provide a slow speed network of locally serving streets.	No Conflict. While this is a citywide policy, the Project would not conflict with its implementation. Grand Avenue and 8th Street are not part of the Neighborhood Enhanced Network. While Hope Street is designated as a Neighborhood Enhanced Network by the Mobility Plan, the Project would not modify Hope Street. Therefore, the Project would not conflict with this policy.
Policy 2.5 Transit Network: Improve the performance and reliability of existing and future bus service.	No Conflict. While this is a citywide policy, the Project would not conflict with its implementation. The Project Site is not immediately adjacent to any Transit Enhanced Streets as identified in Mobility Plan 2035. In addition, there is substantial existing transit capacity in the Project

Goals/Objective/Policy	Would the Project Conflict?
	vicinity, including rail and bus lines as well as seven local and regional transit operators. Therefore, the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with this policy.
Policy 2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	No Conflict. While this is a citywide policy, the Project would support its implementation. The Project is located in proximity to existing bicycle routes and would therefore provide convenient access to multi-modal transportation opportunities for pedestrians and bicyclists. The existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). There are currently Tier 1 protected bike lanes on Figueroa Street, 7th Street, Grand Avenue, and Olive Street as part of the Bicycle Enhance Network (a network of protected bicycle lanes and bicycle paths that provide a higher level of comfort for a variety of users). In addition, as part of the Bicycle Lane Network (a network of arterial roadways that will receive striping treatments to prioritize bicyclists), Tier 3 Bicycle Lanes are proposed on Flower Street and Broadway. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. The Project would comply with the LAMC and Bicycle Parking Ordinance requirements and would provide 27 short-term and 224 long-term bicycle parking spaces. Short-term bicycle parking would be available on the ground floor on the sidewalks along Hope Street and Grand Avenue and within the ground and subterranean levels, while long-term bicycle parking would be located within the below-grade parking, enclosed from inclement weather, and secured from the general public. Both short-term and long-term bicycle parking would be accessed by the tower elevators, without needing to cross automobile parking areas. Therefore, the Project would not conflict with policy.
Policy 2.10 Loading Areas: Facilitate the provision of adequate on and off-street loading areas.	No Conflict. The Project would allow service, delivery, and trash collection vehicles to enter the Project Site via Hope Street to reach the internal loading area and exit via Grand Avenue. Visitors, taxis, and rideshare vehicles would enter the Project Site from either Hope Street or Grand Avenue, access the porte cochère, and exit via Grand Avenue. Therefore, the Project would not conflict with this policy.
Policy 2.17 Street Widenings: Carefully consider the overall implications (costs,	No Conflict. As discussed in Section IV.G, Transportation, of this Draft EIR, the Project would be in

Refer to Table 1.2 and Figure 1.3 of the Project's Transportation Assessment included as Appendix G of this Draft EIR.

Goals/Objective/Policy

Would the Project Conflict?

character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.

compliance with the street standards for Grand Avenue and Hope Street. On 8th Street, pursuant to the Project's VTTM, the Project would propose to not widen the street by 10 feet to required standards, and would request a 2 feet waiver of dedication and improvements on the west side of 8th Street and a 10 feet waiver of dedication and improvements on the east side of 8th Street in order to maintain the 23 feet half-roadway width and provide for the 12 feet required sidewalk width, as reflected on the VTTM. LADOT has determined that the required street widening would not be necessary as the required street widening will not enhance the existing circulation system and there will be no loss in the standard sidewalk width, and has recommended waiving the widening.8 For 8th Street, the Project would not be in compliance with the requirements of the Mobility Plan 2035 and the Downtown Street Standards, as it would seek a waiver of dedication and improvements of 2 feet on the west side and 10 feet on the east side of 8th Street. The Project's request for a waiver of dedication and improvements would, however, be consistent with Mobility Plan 2035 Policy 2.17 as it would carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, and, therefore, the Project would not conflict with the intent of the Mobility Plan.

Policy 3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.

No Conflict. As discussed above in Policies 1.1, 2.3, and 2.6 of the Mobility Plan, the Project Site would include safe and accessible pedestrian, bicycle, and vehicular access. In addition, as previously described, the Project is located in an area well-served by public transit. The Project is located approximately two blocks from the 7th Street/Metro Center Metro Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro also operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the Additional transit lines include nine Project vicinity. LADOT Commuter Express lines, five LADOT Dash bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. Therefore, the Project would provide opportunities for the use of all

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

Goals/Objective/Policy	Would the Project Conflict?
	modes of travel and would not conflict with this policy.
Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	No Conflict. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new development consisting of residential and neighborhood-serving commercial/retail/restaurant uses in proximity to existing jobs (including those that may be offered on-site), destinations, and other neighborhood services in a transit-rich area. The proposed uses and existing mixed-uses would be within walking/biking distance and/or accessible via transit services, reducing vehicular trips. Therefore, the Project would be not conflict with this policy.
Policy 3.4 Transit Services: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	No Conflict. As discussed in Policy 3.1. the Project would be well-served by public transit service within the vicinity. Thus, residents, workers, and visitors of the Project would be well-served by affordable, efficient, convenient, and attractive transit services, which would promote transit use and a reduction in vehicle trips, and, as such, the Project would not conflict with this policy.
Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle facilities.	No Conflict. See Policy 2.6 of the Mobility Plan. The Project would comply with the LAMC and Bicycle Parking Ordinance requirements. Short-term bicycle parking would be available on the ground floor and within the belowgrade parking, while long-term bicycle parking would be enclosed from inclement weather and secured from the general public. Both short-term and long-term bicycle parking could be accessed by the tower elevators, without needing to cross automobile parking areas. The Project would not conflict with this policy.
Policy 4.13 Parking and Land Use Management: Balance on-site and off-site parking supply with other transportation and land use objectives.	No Conflict. The Mobility Plan recognizes that an oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multimodal mobility system and that parking consumes a vast amount of space in the urban environment, which otherwise could be put to valuable alternative uses. The Mobility Plan also observes that large parking lots create significant environmental impacts, detract from neighborhoods' visual quality, and discourage walking by increasing the distances between services and facilities. The Project would replace the existing parking structure and surface parking lot with a mixed-use project that would provide adequate parking for the residential and ground level commercial/retail/restaurant uses. The proposed parking would be provided within the Project building itself, and above grade parking would be screened from view by architectural features. In addition, the Project would provide reduced residential parking according to the Central City Parking Exception pursuant to LAMC Section

Goals/Objective/Policy	Would the Project Conflict?
	12.21-A,4. As such, the development the new building would improve the visual quality of the neighborhood and activate the streets with more pedestrian activity, and the Project would balance parking supply with other transportation and land use objectives. Therefore, the Project would not conflict with this policy.
Policy 5.1 Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health. Policy 5.2 Vehicle Miles Traveled: Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. The Project would promote a sustainable transportation system to reduce VMT by locating housing in proximity to jobs, transit, and services. Project residents would therefore have the opportunity to walk, bike, and ride transit to access the Downtown Center and surrounding areas. The Project Site is within the Central City Parking District (LAMC Section 12.21-A,4(p)) and the Exception Downtown Parking District (LAMC Section 12.21-A,4(i)), which were areas with reduced parking requirements created by City Council due to the area's unique proximity to jobs and housing. As many trips can be made by transit and walking, there would a reduced need for a car in a downtown environment, and therefore, a reduced demand of parking spaces. Furthermore, as discussed above, the Project is located approximately two blocks from the 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro also operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the Project Area. Additional transit lines include nine LADOT Commuter Express lines, five LADOT Dash bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line and one Torrance Bus line operating in the Project vicinity. Therefore, the Project would promote the use of walking, biking, and transit, and would support VMT reduction. The Project would not conflict with this policy.
Policy 5.4 Clean Fuels and Vehicles: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	No Conflict. While this policy applies to large-scale goals relative to fuel sources, technologies and infrastructure, the Project would support and not conflict with this policy. The Project would facilitate the use of alternative-fuel, lowemitting, and fuel-efficient vehicles by providing parking spaces that are equipped with electric vehicle charging stations. Therefore, the Project would not conflict with this policy.
Policy 5.5 Green Streets: Maximize opportunities to capture and infiltrate stormwater within the City's public rights-ofway.	No Conflict. As discussed above for Framework Element Policy 9.3.1, and as discussed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, Project construction activities would occur in accordance with City grading permit regulations and

Goals/Objective/Policy	Would the Project Conflict?
	NPDES requirements to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include BMPs to collect detain, treat, and discharge runoff on-site. The Project would include on-site filtration and infiltration drywalls, and the proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. Therefore, the Project would support the reduction of runoff entering the stormwater system, and the Project would not conflict with this policy.

Table 4
Applicable Objectives and Policies of the General Plan Housing Element 2013–2021

	1
Policy	Would the Project Conflict?
Policy 1.1.4: Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.	No Conflict. The Project expands residential development opportunities in a designated Regional Commercial Center and within the Downtown Center. The Project would provide 580 new multi-family residential apartment units consisting of a mix of studio, one-, two-, and three-bedroom units. In addition, the Project would be located in an urbanized commercial area that is well-served by local and regional transit options. Therefore, the Project would promote housing next to transit within a designated center and would not conflict with this policy.
Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.	No Conflict. The Project would create a mixed-use development consisting of residential and commercial/retail/restaurant uses. Specifically, the Project would provide 580 new residential units (i.e., studios, one-, two-, and three-bedroom) at varying cost levels. The Project would also be located in an area well-served by public transit, including the 7th Street/Metro Center Rail Station (approximately two blocks north of the Project Site) and numerous bus lines. The Project would also provide bicycle parking on-site to encourage alternative modes of transportation. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate sustainability features to support and promote environmental sustainability. Therefore, the Project would not conflict with this objective.
Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.	No Conflict. As discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate environmentally sustainable design features required by the Los Angeles Green Building Code. Sustainable design features would also be incorporated to reduce energy and water usage and wastewater and solid waste generation, thereby promoting the construction of a sustainable building to minimize the Project's effects on the environment and minimize the use of non-renewable resources. Therefore, the Project would not conflict with this objective.
Policy 2.3.2: Promote and facilitate reduction of water consumption in new and existing housing.	No Conflict. As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in addition to complying with water conservation requirements, the Project would incorporate Project Design Feature WAT-PDF-1 to further reduce water usage from the proposed development, including new housing. Specifically, the new residential units and amenities would be equipped with, among others, high efficiency toilets, clothes washers, dishwashers, and low-flow kitchen/lavatory faucets and showerheads, and water-saving pool

Table 4 (Continued)
Applicable Objectives and Policies of the General Plan Housing Element 2013–2021

Policy	Would the Project Conflict?
	components. Therefore, the Project would not conflict with this policy.
Policy 2.3.3: Promote and facilitate reduction of energy consumption in new and existing housing.	No Conflict. As described in Section II, Project Description, of this Draft EIR, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen, which would reduce energy usage on the Project Site, including the residential uses. In addition, the Project would include project design features aimed at improving energy efficiency and reducing energy consumption, as outlined in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR. As detailed in Project Design Feature GHG-PDF-1, the Project would incorporate Energy Star-labeled products and appliances and energy efficient lighting technologies.
	The Project would also meet the City's electric vehicle requirements to provide parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Overall, as evaluated in Section IV.B, Energy, of this Draft EIR, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. Therefore, the Project would not conflict with this policy.
Policy 2.3.4: Promote and facilitate reduction of waste in construction and building operations.	No Conflict. As discussed in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, during construction of the Project, construction materials would be recycled in accordance with SB 1374, and the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. Therefore, the Project would not conflict with this policy.
Policy 2.4.3: Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces.	

Table 4 (Continued) Applicable Objectives and Policies of the General Plan Housing Element 2013–2021

Policy	Would the Project Conflict?
	troughs, leak detection systems for pool/spa, pool metering, drip/subsurface irrigation where appropriate, and proper hydro-zoning/zoned irrigation. Therefore, the Project would not conflict with this policy.
Source: Eyestone Environmental, 2021.	

Table 5
Applicable Goals, Objectives, and Policies of the Central City Community Plan

Objective/Policy	Analysis of Project Consistency
Residential	
Objective 1-2: To increase the range of housing choices available to Downtown employees and residents. Objective 1-3: To foster residential development which can accommodate a full range of incomes.	No Conflict. The Project would support these objectives through the development of 580 multi-family residential units, consisting of a range of housing types including studio, one-, two-, and three-bedroom units. Downtown employees and residents would be provided with new housing choices that are conveniently located and accessible to jobs, commercial, retail, and restaurant services. Therefore, the Project would not conflict with these objectives.
Policy 1-3.1: Encourage a cluster neighborhood design comprised of housing and services.	No Conflict. The Project would provide new housing opportunities and neighborhood–serving commercial/retail/restaurant uses to the community. The Project would provide these uses in proximity to other similar land uses, including residential and commercial uses, as well as transit services. Therefore, the Project would support neighborhood design comprised of housing and services, and the Project would not conflict with this policy.
Commercial	
Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.	No Conflict. To maintain and promote a safe environment, the Project would incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security; a closed circuit security camera system; keycard entry for the residential entries and residential parking areas; proper lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into building; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. To promote a clean environment, the Project would be privately maintained and would include numerous trash receptacles and recycling bins for residents, guests, employees, and commercial patrons. To provide and maintain an attractive and lively environment, the Project would replace a parking structure and surface parking lot with a contemporary mixeduse building that would complement the surrounding design and uses. In addition, the Project would provide a pedestrian-oriented environment by locating high-density residential and commercial/retail/restaurant uses on the ground floor and in proximity to public transit and by providing landscape and streetscape improvements along 8th Street, Grand Avenue, and Hope Street. All of these elements would contribute to a safe, clean, attractive, and lively environment, and, therefore, the Project would not

Table 5 (Continued) Applicable Goals, Objectives, and Policies of the Central City Community Plan

Objective/Policy	Analysis of Project Consistency
	conflict with this policy.
Policy 2-2.1: Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force and businesses.	No Conflict. The Project would include up to 7,499 square feet of commercial/retail/restaurant uses that would serve residents and the community. These uses would complement the employment base of the Community Plan area, meet the needs of local residents, and continue building on the strengths of the existing labor force and businesses in Downtown Los Angeles. Therefore, the Project would not conflict with this policy.
Government and Public Facilities	
Objective 4-1: To encourage the expansion and additions of open spaces as opportunities arise.	No Conflict. The Project would provide a variety of open space areas within the Project Site, including approximately 13,140 square feet of indoor open space, 15,358 square feet of outdoor open space, 8,596 square feet of outdoor covered open space, and 28,100 square feet of private balcony space. The common open space elements of the Project would be provided in a tiered terrace arrangement throughout the vertical levels of the building, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36.
	Per LAMC Section 12.21-G, the Project would be required to provide a total of 145 trees on-site, based on 580 residential units. The Project can only accommodate 79 of the 145 tree plantings on-site. As part of the Project, seven existing street trees would be removed as part of construction, and a row of street trees would be planted along 8th Street, Hope Street, and Grand Avenue. Street tree removal would require the approval of the Board of Public Works, and street trees would be replaced per the replacement requirements of the Urban Forestry Division, which typically require replacement at a 2:1 ratio. Due to physical constraints, the Project would be able to accommodate the planting of 10 of the 14 street tree replacements in the public right-of-way. Pursuant to LAMC Section 62.177, the Applicant has requested to pay a Development Tree Planting Requirement In-Lieu Fee for a total of 70 trees (66 on-site and 4 off-site in the public right-of-way) otherwise required to be planted within the Project pursuant to LAMC Section 12.21-G,2.(a)(3) and the Board of Public Works replacement policy. In addition, the

of Public Works replacement policy. In addition, the

Table 5 (Continued) Applicable Goals, Objectives, and Policies of the Central City Community Plan

Objective/Policy	Analysis of Project Consistency
	Project would pay for any applicable park/Quimby fees. Therefore, the Project would not conflict with this objective.
Policy 4-4.1: Improve Downtown's pedestrian environment in recognition of its important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers, and visitors.	No Conflict. The Project would remove a parking structure and surface parking lot and introduce new residential units and commercial/retail/restaurant uses in the Downtown Center and in a TPA and HQTA. The Project Site is well-served by the numerous transit options within the vicinity. The Project Site is approximately two blocks from the 7th Street/Metro Center Rail Station, which contains the Metro Red, Purple, Blue, and Expo lines, and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro also operates four rail lines in the Project area. Additional transit lines in the Project vicinity include nine LADOT Commuter Express lines, five LADOT Dash bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line and one Torrance Bus line. In addition to being located in a transit-rich area, the Project would further encourage pedestrian travel by providing ground floor commercial/retail/restaurant uses with extensive windows and continuous balconies situated 25 feet above grade that would provide a closer pedestrian experience with the development's tenants and the street and sidewalk by introducing a human scale element and visual interest to pedestrians. Furthermore, the Project's close proximity to nearby retail, restaurants, and jobs would also promote pedestrian and transit accessibility to these uses. Therefore, the Project would provide opportunities to improve Downtown's pedestrian environment, recognizing the various alternative modes of transportation available in the immediate vicinity of the Project Site. Therefore, the Project would not conflict with this policy.
Policy 5-2.1: Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.	No Conflict. See Policy 2-1.2 above. As provided in Section IV.F.2, Public Services—Police Protection, of this Draft EIR, the Project would include private on-site security; a closed circuit security camera system; keycard entry for the residential entries and residential parking areas; and proper and sufficient lighting to promote safety and maximize visibility. The Project would not conflict with this policy.
Transportation and Circulation	
Objective 11-4: To take advantage of the district's easy access to two mass transit rail lines, the freeway system, and major	

Table 5 (Continued) Applicable Goals, Objectives, and Policies of the Central City Community Plan

Objective/Policy	Analysis of Project Consistency
boulevards that connect Downtown to the region.	the vicinity. The Project Site is also located approximately two blocks from the 7th Street/Metro Center Rail Station. The Project would not conflict with this objective.
Policy 11-6.1: Preserve and enhance Central City's primary pedestrian-oriented streets and sidewalks and create a framework for the provision of additional pedestrian friendly streets and sidewalks which complement the unique qualities and character of the communities in Central City.	No Conflict. See Policy 2-1.2 and Policy 4-4.1 under Government and Public Facilities. The Project would provide a pedestrian-oriented environment by locating high-density residential and ground-floor commercial/retail/restaurant uses in proximity to public transit and by providing landscape and streetscape improvements along 8th Street, Grand Avenue, and Hope Street. The Project would also provide lighting for pedestrians. The Project would not conflict with this policy.
Objective 11-7: To provide sufficient parking to satisfy short-term retail/business users and visitors but still find ways to encourage long-term office commuters to use alternate modes of access.	No Conflict. Adequate parking would be provided on-site in accordance with LAMC requirements. The Project would provide 606 vehicle parking spaces designated for the residential units and 34 spaces pursuant to covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248). Furthermore, the Project would support public transit due to its location in an area well-served by public transit, which would potentially reduce parking demand. In addition, the Project would promote bicycle use by providing bicycle parking areas. Therefore, the Project would not conflict with this objective.

Table 6
Applicable Standards and Guidelines of the Downtown Design Guide

Standards/Guidelines Would the Project Conflict? SECTION 2: LIVABLE AND SUSTAINABLE DOWNTOWN A. Design Principles for District and Neighborhood Design **Transportation Choices.** Enable people to **No Conflict.** The Project would be located approximately move around easily on foot, by bicycle, transit, two blocks from the Metro 7th Street/Metro Center Station, which contains the Metro Red, Purple, Blue, and Expo and automobile. Accommodate cars when necessary and allow people to live easily lines, and is considered a hub of the regional rail network. Numerous bus lines, including local, express and rapid without one. lines, also run in the vicinity. The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a TPA and SCAG-designated HQTA. In addition, the Project would promote use of bicycles by providing a total of 251 bicycle parking spaces for the residential commercial/retail/restaurant uses. As such, the Project would provide people with accessible transportation choices and allow for mobility without requiring an automobile. Therefore, the Project would not conflict with this design principle. Within Walking **No Conflict.** The Project would provide up to 7,499 square Shops and Services Distance. floor Provide shops and services for feet around neighborhood-serving everyday needs, including groceries, day commercial/retail/restaurant uses. In addition, the Project is cares, cafes and restaurants, banks and located within walking distance to the Whole Foods grocery pharmacies, within walking distance from store and CVS pharmacy store across the street, and is home. surrounded by numerous cafes and restaurants, banks, and other services within walking distance in the Downtown community. Therefore, the Project would not conflict with this design principle. Safe. Shared Streets. Design streets not just No Conflict. The Project would provide improved sidewalks with street trees and a widened sidewalk along 8th Street to for vehicles, but as usable outdoor space for walking, bicycling, and visual enjoyment. improve pedestrian travel and public use. In addition, the Project would provide bicycle parking spaces along the sidewalks of Hope Street and Grand Avenue. Therefore, the Project would not conflict with this design principle. Active Recreation Areas. Provide adequate No Conflict. The Project would provide a variety of indoor public recreational open space, including joint and outdoor open space and recreational amenities for residents on Levels 10, 11, 21, 22, 35, and 36. Specifically, use open space, within walking distance of residents. outdoor areas would be located on Levels 10, 21, and 35 and would include uses such as a pool, event lawn, barbeque and dining areas, seating, event lawn, fire pit, coworking spaces, coffee and snack bar, pavilion, water feature, gathering garden, dining areas, a catering kitchen, and lounge. As such, while such areas would not be open to the public, the residents would have accessible and active recreation areas and would meet the Downtown Design Guide intent to provide a livable and sustainable Downtown. Therefore, the Project would not conflict with this design principle.

	
Standards/Guidelines	Would the Project Conflict?
Transit-Oriented. Since all of Downtown is within walking distance of transit, design all projects as transit-oriented developments (TODs) that encourage resident, tenants and visitors to use transit.	No Conflict. See discussion above for "Transportation Choices." As mentioned above, the Project Site is being designed in a TPA and SCAG-designated HQTA within which residents would have numerous transit choices to travel. In addition, the high-density residential uses combined with the streetscape design including large windows and doors of the Project would support the street interaction to promote walkability, reduce vehicle dependence, and the use of nearby transit. The Project would not conflict with this design principle.
Green Streets. Design sidewalks, including street trees, parkways, tree wells and paving, to collect stormwater runoff, thereby contributing to sustainable Green Streets, thereby enhancing the value of the project. Design alleys and paseos to collect stormwater where feasible.	No Conflict. As discussed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site. The Project would include on-site filtration and infiltration drywalls, landscaping and street trees which would increase permeable surface area offsite and reduce the quantity and improve the quality of stormwater runoff generated onsite. Therefore, the Project would support the reduction of runoff entering the stormwater system, and the Project would contribute to sustainable Green Streets and not conflict with this design principle.
SECTION 2: LIVABLE AND SUSTAINABLE DO	WNTOWN
B. Design Principles for Building Design	
Pedestrian-Oriented. Support walkability through sensitive design of the site, building, and streetscape. Recognize individual projects are the "building blocks" of great streets and neighborhoods. This requires particular attention to the way the building meets the sidewalk, providing a transition to pedestrian scale and elements that activate the street.	No Conflict. The Project would promote pedestrian activity by providing ground floor commercial/retail/ restaurant uses that would feature extensive windows entrance doors along all adjacent streets to encourage pedestrian activity and create a human-scale frontage design. The Project would improve the pedestrian environment by providing street trees along the sidewalks around the Project Site, including 8th Street, which would provide a six-foot average sidewalk easement where the requirement is five feet. Therefore, the Project would not conflict with this design principle.
Transit-Oriented. Orient projects to provide convenient access to the nearest transit options (Metro rail or bus, DASH) wherever possible.	, ,
Multi-Modal. Accommodate vehicular access and parking in a way that respects pedestrians and public spaces and contributes to the quality of the neighborhood.	

Standards/Guidelines	Would the Project Conflict?
	located within an area that would minimize pedestrian travel and public spaces. Therefore, the Project would not conflict with this design principle.
Sustainable. Produce efficient and creative solutions to move toward zero-carbon buildings. Include innovative technology and building design strategies to increase renewable energy production (solar and/or wind), water conservation, reduce energy use, waste, and automobile use. Incorporate onsite landscape elements that reduce energy use and enhance livability. Consider providing a green roof or white roof design strategies to reduce solar gain (which contributes to the urban heat island effect) and to reduce the quantity of water entering the storm drain system. Comply with the City's Low-Impact Development (LID), Standard Urban Stormwater Mitigation Plan (SUSMP), and Green Building Ordinance and design buildings capable of achieving LEED TM Silver certification. Projects that include a hotel should participate in the California Green Lodging Program, California Seal Certification Program, or similar program.	No Conflict. The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code, which also incorporates various provisions of CALGreen, and to meet LEED certified equivalent building standards. These include energy conservation, waste reduction features, and a pedestrian- and bicycle-friendly site design. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible. The sustainability features to be incorporated into the Project would include, but would not be limited to, high efficiency/low-flow -labeled plumbing fixtures and drip/subsurface irrigation systems to promote a reduction of indoor and outdoor water use, Energy Star-labeled products and appliances, and water-efficient landscape design. The Project would also include energy-efficient lighting technologies and fenestration designed for solar orientation. Refer to Project Design Feature AIR-PDF-2 in Section IV.A, Air Quality, of this Draft EIR; Project Design Feature WAT-PDF-1 in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. The proposed use of continuous balconies along portions of the building would also provide passive shading for indoor spaces, reducing energy consumption and allowing for increased natural daylighting and natural ventilation via fully-operable balcony doors and windows. In addition, the Project would meet the City of Los Angeles, Green Building Code Requirements for parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Therefore, the Project would not conflict with this design principle.
SECTION 3: SIDEWALKS AND SETBACKS A. Sidewalks	
Design sidewalks that are walkable and accommodate a variety of uses in the Walkway Zone.	No Conflict. The Project would provide improved sidewalks with street trees, a widened sidewalk along 8th Street, and ground level commercial/retail/restaurant uses to improve pedestrian travel and public use around the Project Site.

Standards/Guidelines	Would the Project Conflict?
	The street trees would serve as a barrier between the roadway and the zone of pedestrian movement. The Project would remove the existing street trees adjacent to the Project Site as part of construction and would plant a row of street trees along 8th Street, Hope Street, and Grand Avenue. The street trees would be selected with approval from the Urban Forestry Division of the City Department of Public Works and would be able to grow and mature without being obstructed by the proposed balconies, which would be situated at 25 feet above grade. Pursuant to LAMC Section 12.22-A,30(e), the Applicant would request a Specific Plan Project Permit Adjustment to deviate from the provisions of the Downtown Design Guide to allow for balcony projections over the required sidewalk easement to begin at a lower elevation at 25 feet above grade. Thus, with approval of the request, the Project would not conflict with the Downtown Design Guide standards and guidelines related to sidewalks. In addition, the Project would comply with the Mobility Plan 2035 and Adopted Downtown Street Standards along Grand Avenue and Hope Street. Along 8th Street, the Project would provide a 6-foot average sidewalk easement, which exceeds the 5-foot requirement, and a 12-foot sidewalk width, but would seek a 2-foot waiver of dedication and improvements on the west side of 8th Street and a 10-foot waiver of dedication and improvements on the east side of 8th Street and a 10-foot waiver of dedication and improvements on the half right-of-way width would be 35 feet. The Project would therefore provide a wider sidewalk along 8th Street, and would maintain the consistency of the roadway curb line and the number of traffic lanes with the block east of the Project Site. To the west of the Project Site, the half-roadway width increases to 33 feet between Hope Street and Flower Street and Figueroa Street. LADOT has also determined that the required street widening would not enhance the existing circulation system and there would be no loss in the standard si
Design sidewalks that incorporate green elements and collect stormwater through the	No Conflict. As discussed above, the Project would provide street trees and increase permeable areas along the Parkway Zone. The street trees would be selected with

Email communication from LADOT (Wes Pringle) to Department of City Planning (Polonia Majas), February 11, 2020.

Standards/Guidelines	Would the Project Conflict?
Parkway Zone. Design continuous parkways to accommodate and support large street trees and to collect stormwater, where feasible. Where continuous parkways are not feasible, provide large street tree wells with gap-graded soil beneath the sidewalk.	approval from the Urban Forestry Division of the City Department of Public Works and would be able to grow and mature without being obstructed by the proposed balconies. Therefore, the Project would design sidewalks with green elements and would not conflict with these design principles.
SECTION 3: SIDEWALKS AND SETBACKS B. Setbacks	
Provide setbacks appropriate to the adjacent land use and district.	No Conflict. The Downtown Design Guide encourages variations in setbacks along street frontages and dictates that retail streets in the Financial Core include setbacks of 0 to 3 feet. The portions of Hope Street and Grand Avenue adjacent to the Project Site are identified as retail streets in the Financial Core and would meet the setback guidelines. The portion of 8th Street adjacent to the Project Site would not include setbacks, consistent with the Downtown Design Guide permitted setbacks for adjacent ground floor uses in the Financial Core. Per Figure 3-1 of the Downtown Design Guide, at least 75 percent of a development's ground floor street frontage along retail streets, excluding access to parking, must be designed to accommodate retail, professional office, or live work uses. Narrow site conditions with limited frontages on Hope Street and Grand Avenue make strict compliance with percentages and length-of-storefront conditions impossible or impractical to comply with once a limited amount of wall surface is set aside for necessary elements for the operation of the building, such as exit stairs, ventilation louvers and equipment necessary to operate the building. As such, pursuant to LAMC Section 12.22-A,30(e), the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide to provide less than 75 percent active uses along the retail streets of Hope Street and Grand Avenue. As such, with approval of the Specific Plan Project Permit Adjustment, the Project would not conflict with the DDG standards and guidelines related to street frontages. Therefore, the Project would not conflict with this design principle.
SECTION 4: GROUND FLOOR TREATMENT A. Ground Floor Treatment Along All Streets	
Orient buildings to the street to promote sidewalk activity, with building entries located on the public street. Additional public	No Conflict. Refer to the discussion under "Design Principles for District and Neighborhood Design," "Sidewalks," and "Setbacks." The Project would include active ground floor uses that are oriented to toward 8th

Standards/Guidelines

Would the Project Conflict?

entrances are encouraged.

Incorporate a pedestrian-oriented scale at the street level, with strongly articulated street fronts and high-quality materials.

Don't waste valuable street frontage on "back of house" uses associated with the proposed building.

Street, Hope Street, and Grand Avenue with public entrances. Consistent with the Downtown Design Guide, electrical transformers, mechanical equipment and other equipment will not be located along the ground floor street wall, unless as required by Department of Water and Power (DWP) or other City agencies. The Project would include a LADWP vault fan room along Grand Avenue. In addition, while the Project would also include an emergency generator necessary for building operations along Hope Street, any walls not serving the active uses would not be blank and would be articulated with materials such as blue tiles. The Project would not conflict with these design principles.

SECTION 4: GROUND FLOOR TREATMENT

B. Ground Floor Treatment Along Retail Streets

Ground floor spaces on designated Retail Streets shall be further enhanced for retail or other active uses, orienting tenant spaces to the street and maximizing storefronts and entries along the sidewalks to sustain street level interest and promote pedestrian traffic.

No Conflict. Refer to the discussion under "Design Neighborhood Design." Principles for District and "Sidewalks," and "Setbacks." The proposed ground-level neighborhood-serving commercial/retail/restaurant uses are intended to promote pedestrian activity and further activate the streets in the surrounding area. Active uses are also proposed along a non-retail street (8th Street) and both corners (8th Street & Grand Avenue; 8th Street & Hope Street) and storefronts which would create a wrap around on each corner to the greatest extent possible. Any walls not serving the active uses would not be blank and would be articulated with materials such as blue tiles. Therefore, the Project would not conflict with the intent of this design principle.

SECTION 4: GROUND FLOOR TREATMENT

C. Ground Floor Treatment Along Other Streets

Design ground floor space facing other streets to accommodate habitable space and to avoid blank walls and visible parking.

No Conflict. The proposed uses along 8th Street, a nonretail street, would not meet the DDG requirement to provide a minimum of 75 percent active uses along nonretail streets. Any walls not serving the active uses would not be blank and would be articulated with materials such as blue tiles. Parking would be provided below and above ground and would be screened from public view, as further detailed below under "Parking and Access". In addition, similar to active uses provided on retail streets, any active use provided on non-retail streets is required to meet a minimum depth of 25 feet. As such, pursuant to LAMC Section 12.22-A,30(e), the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide, to provide less than 75 percent active uses along the nonretail street of 8th Street. Therefore, with approval of this

Standards/Guidelines	Would the Project Conflict?
	Specific Plan Project Permit Adjustment, the Project would not conflict with the DDG standards and guidelines related to street frontages along 8th Street.

Section 5: PARKING AND ACCESS A. All Parking and Access

Locate parking, loading, and vehicular circulation to minimize its visibility.

Locate drop-off zones along the curb or within parking facilities to promote sidewalk/street wall continuity and reduce conflicts with pedestrians.

No Conflict. All of the Project's parking would be integrated into the building within subterranean, at-grade, and aboveground parking levels. All loading and service vehicles areas would be located internally onsite. Visitor, taxi, and rideshare vehicles would have assigned passenger pickups and drop-offs within the ground level porte cochère within the ground floor parking area. The Project would remove the two existing driveways along 8th Street to provide continuity of the sidewalk and improve the safety of pedestrians traveling along the street. The current Downtown Design Guide dated June 8, 2017, states that three levels of podium parking shall be the maximum permitted when deemed appropriate by Department of City Planning staff; and any parking level above the 3rd parking level fronting on a public street must be lined with habitable floor area and/or enclosed with a curtain wall, or integrated into the building façade. However, more recently, on October 24, 2019, the City Planning Commission endorsed an Above-Grade Parking Advisory and stated that the Downtown Design Guidelines are being updated as part of the Downtown Community Plan Update and will also include additional guidance as to the treatment of above-grade parking based on the Above-Grade Parking Advisory. Given the narrow site conditions, more than three aboveground parking levels are necessary to adequately serve the Project. The parking podium would be integrated into the design of the building façade so that each aboveground parking level would be both screened by active uses for a portion of the floor, with the remainder of the floor at parking areas screened with a window wall to match the adjacent residential units. Additionally, each parking level would be lined with an extended slab and balcony quardrail that would be identical to that used for the balconies of the residential units, which would screen the above-grade parking from public view and create a unified architecture from grade to the top of the building. Project would comply with the advisory and future updates to above-grade parking. Therefore, the Project would not conflict with this design principle.

Encourage the use of alternate modes of transportation by providing incentives for

No Conflict. The Project would encourage alternate modes of transportation by providing bicycle parking in accordance

	•
Standards/Guidelines	Would the Project Conflict?
reduced automobile use.	with the City's Bicycle Parking Ordinance. Therefore, the Project would not conflict with this design principle.
Limit the number and width of curb cuts and vehicular entries to promote street wall continuity and reduce conflicts with pedestrians. SECTION 6: MASSING AND STREET WALL	No Conflict. The Project would reduce the curb cuts on the Project Site compared to existing conditions from four to two. The two proposed curb cuts are the minimum needed to access the upper and lower garage. The Project's driveways on Hope Street and Grand Avenue would be located near driveways on adjacent garage properties immediately to the north to maintain continuity of the sidewalk to the greatest extent possible around the Project Site. The curb cuts would be located as far from intersections as possible, creating space for active ground floor uses at the corners of the building to enhance placemaking. In addition, the Project's longest street frontage, on 8th Street, would run the full block without being interrupted by a driveway and improve the safety of pedestrians. As detailed in Section IV.G, Transportation, of this Draft EIR, the Project would comply with requirements in Section 321, Driveway Design, of LADOT's Manual of Policies and Procedures along Hope Street and Grand Avenue to provide an adequate number of driveways with adequate widths. Therefore, the Project would not conflict with this design principle.
A. Massing	
	No Conflict. The proposed building would be comprised

that are sensitive to the neighborhood context.

wall with well-scaled elements or structures of four above-ground tiers with varying stepbacks from Hope Street. Landscaped terraces would be located on the upper level of each tier. Through the stepped tower massing, the urban street wall would be articulated by the mass of the first tier of the building. The proposed neighborhood-serving commercial/retail/restaurant uses on the ground level would be designed with window treatments, architectural design features, and building articulations to enhance the pedestrian realm. Project would also provide an attractive sidewalk design that would promote pedestrian activity in the surrounding area. Therefore, this Project would not conflict with this design principle.

SECTION 6: MASSING AND STREET WALL

B. Street Wall

On Retail Streets, design building walls along the sidewalk (Street Walls) to define the street and to provide a comfortable scale for pedestrians.

No Conflict. See massing discussion above regarding street wall design. The Project would also comply with and exceed the minimum building street wall height requirements for the Financial Core along the Project Site's frontages from 8th Street, Grand Avenue, and Hope The Project would not conflict with this design

Standards/Guidelines	Would the Project Conflict?
	principle.
SECTION 6: MASSING AND STREET WALL C. Spacing	
Tower Spacing: The portion of a tower above 150 feet shall be spaced from all existing, proposed, or possible future towers, both on the same block and across the street, as illustrated in Figure 6-2 and described in Table 6-2.	No Conflict. In accordance with the Downtown Design Guide, the portion of the Project tower above 150 feet would be spaced greater than 80 feet from potential development(s) to the north within the same block. The Project would also be spaced greater than 80 feet from an existing residential tower to the south across 8th Street and an existing residential tower at the southwestern portion of the 8th Street/Hope Street intersection.
Provide privacy and natural light and air for all residential units.	No Conflict. All residential units would have access to natural light and air. Of 580 units, 562 units would have private balcony space. Therefore, the Project will not conflict with this design principle.
SECTION 7: ON-SITE OPEN SPACE AND LAN A. Open Space Network	DSCAPING
 Establish a clear hierarchy of open spaces which may include the following typologies: Streets: Streets, pedestrian-oriented alleys, and enhanced driveways are the most public of all open spaces. When enhanced for multi-modal connections and designed as livable spaces, they communicate the quality of the public environment and the care a city has for its residents. Roof and Podium Terraces: Roof terraces and gardens can augment open space and are especially encouraged in conjunction with hotels or residential uses. 	No Conflict . At the ground level, Project would provide bicycle parking spaces along the sidewalks of Hope Street and Grand Avenue. The Project would also provide street trees along 8th Street, Hope Street, and Grand Avenue with species approved by the Urban Forestry Division. In addition, the Project would provide a variety of indoor and outdoor open space and recreational amenities for residents on Levels 10, 11, 21, 22, 35, and 36. Specifically, outdoor areas would be located on Levels 10, 21, and 35 and would include uses such as a pool, event lawn, barbeque and dining areas, seating, event lawn, fire pit, co-working spaces, coffee and snack bar, pavilion, water feature, gathering garden, dining areas, a catering kitchen, and lounge. Therefore, the Project would not conflict with these design principles.
SECTION 7: ON-SITE OPEN SPACE AND LANDSCAPING B/C. Guidelines for All Open Spaces	
All open spaces shall provide ADA-compliant walkways to ensure ease of access for all users.	No Conflict. The Project would provide ADA-compliant walkways within all open spaces on-site. Therefore, the Project would not conflict with this guideline.
All open spaces should include or connect to at least one gathering space or focal element. Additional gathering spaces and focal elements are encouraged for larger open spaces or open spaces with meandering walkways.	No Conflict. All proposed open spaces would have gathering spaces and focal elements. As discussed above, the common open space elements of the Project would be provided in a tiered terrace arrangement throughout the vertical levels of the building. These uses would include a variety of indoor amenities throughout the Project Site as well as outdoor terraces on Levels 10, 21, and 35.

Standards/Guidelines	Would the Project Conflict?
	Therefore, the Project would not conflict with this guideline.
On above-grade open spaces including roof or podium terraces, building cut-outs, or residential courtyards, incorporate trees and other plantings in permanent and temporary planters that will shade, reduce reflective glare, and add interest to the space.	grade and would provide trees and landscaping. Level 3 would include 7 trees, Level 10 would include 37 trees, Level 21 would include 23 trees, and Level 35 would include
Table 7-1: Design Guidelines for On-Site Open Spaces (for Roof/Podium Terrace) Size: 400 sf min.; no less than 15 ft deep. Location: Above grade or rooftop. Containment: No sides. Connection: Direct connection required from primary circulation core. Public Access: Not required. Visibility: Clear sight lines of terrace or focal element. Active Uses: N/A. Seating: 1 seat per 50 sf. Planting 25% off. Hours of Access: 1 hour before and after regular business hours of adjacent uses.	located above grade for use by residents on Level 10 (7,407 square feet outdoor; 4,302 square feet outdoor/covered), Level 21 (4,224 square feet outdoor; 3,329 square feet outdoor/covered), and Level 35 (3,727 square feet outdoor; 964 square feet outdoor/covered). These areas would provide various seating areas and landscaping. Therefore, the Project would not conflict with these guidelines.

SECTION 7: ON-SITE OPEN SPACE AND LANDSCAPING D. Exceptions

Provide adequate site landscaping and residential open space per Section 12.21.G. of the Zoning Code to serve residents. Additional provisions and exceptions are permitted as follows:

3. Any required trees that cannot accommodated on-site may be planted off-site as approved by DCP through coordination with City Plants (a public-private partnership organization with the City of Los Angeles under the Board of Public Works) or similar organization as approved by DCP. Off-site trees may be planted, in the following locations in order of preference: nearby streets, public parks and public facilities. Offsite trees may be planted in the following geographic areas in order of preference: within the Downtown Design Guide project area, abutting neighborhoods, or at the discretion of City Plants. The Applicant shall provide funds to City Plants equivalent to those necessary for the trees, concrete cut, planting, and 3 years of watering and maintenance for each tree. An agreement with City Plants demonstrating compliance

No Conflict. As described in Section II, Project Description, of this Draft EIR, the Project requests a Director's Decision under LAMC Section 12.21-G,3 per Ordinance No. 185,573 (effective July 5, 2018) to pay an in-lieu fee for the planting and maintenance of 70 required trees which cannot be accommodated on-site or on the adjacent sidewalk right-of-In addition, pursuant to LAMC Section 12.22-A,30(e), the Applicant requests a Specific Plan Project Permit Adjustment to deviate from the provisions of the 2017 Downtown Design Guide to allow for balcony projections in the right-of-way to begin at a lower elevation of 25 feet above the sidewalk in lieu of a minimum vertical height of 40 feet above the sidewalk, as recommended by the Downtown Design Guide to accommodate the planting of street trees. The street trees would be selected with approval from the Urban Forestry Division and would be able to grow and mature without being obstructed by the proposed balconies. With approval of these requests, the Project would not conflict with this provision.

Standards/Guidelines	Would the Project Conflict?
with this condition shall be furnished at the time of Building Permit Clearance.	
SECTION 9: STREETSCAPE IMPROVEMENTS B. Responsibilities of the Applicant	
Provide sidewalks, parkways, and walkways as specified in Section 3 (i.e., "Sidewalks and Setbacks")	No Conflict. Refer to Section 3 "Sidewalks and Setbacks," above.
SECTION 9: STREETSCAPE IMPROVEMENTS H. Street Trees	
Trees Species and Spacing; Planting Standards	No Conflict. The street trees would be selected with approval from and in accordance with the City's Urban Forestry Division and would be able to grow and mature without being obstructed by the proposed balconies, which would be situated at 25 feet above grade. As discussed above, pursuant to LAMC Section 12.22-A,30(e), the Applicant would request a Specific Plan Project Permit Adjustment to deviate from the provisions of the Downtown Design Guide to allow for balcony projections over the required sidewalk easement to begin at a lower elevation of 25 feet above grade in lieu of beginning at 40 feet above-grade, as recommended by the Downtown Design Guide. Street tree spacing, planting, and irrigation would comply with the Downtown Design Guide and, therefore, the Project would not conflict with this design principle.