

## **IV. Environmental Impact Analysis**

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### **E. Land Use and Planning**

#### **1. Introduction**

This section analyzes the Project’s potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including Section IV.A, Air Quality, which evaluates the Project’s consistency with the South Coast Air Quality Management District’s (SCAQMD) Air Quality Management Plan (AQMP) and the City of Los Angeles (City) General Plan (General Plan) Air Quality Element; Section IV.D, Greenhouse Gas Emissions, which evaluates the Project’s consistency with the 2008 Climate Change Scoping Plan (and subsequent updates), the City’s Green Building Code, and the City’s Sustainable City pLAN/Green New Deal; Section IV.H, Transportation (and the Transportation Assessment included as Appendix J of this Draft EIR), which evaluates the Project’s consistency with the City’s Mobility Element 2035 and Vision Zero Action Plan, as well as many of the plans discussed herein as they relate to transportation; and Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, which evaluates the Project’s consistency with the Los Angeles Department of Water and Power’s (LADWP’s) Urban Water Management Plan (UWMP).

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

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

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

- California Government Code Section 65302
- Senate Bill 375
- Senate Bill 743

- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Hollywood Community Plan
- Los Angeles Municipal Code
- Hollywood Redevelopment Plan
- Citywide Design Guidelines

### (1) State

#### *(a) California Government Code Section 65302*

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

#### *(b) Senate Bill 375*

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32's greenhouse gas (GHG) emission reduction goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of GHG emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(c) *Senate Bill 743*

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

- “Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- “Transit priority area” means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

Although the Project Site is designated as a transit priority area (TPA) in ZIMAS, based on the identification of a major transit stop on Santa Monica Boulevard on City maps, and although the Project qualifies as an employment center project under PRC Section 21099, a review of bus headways at nearby bus stops indicates they are not frequent enough for the Project Site to be designated as a TPA.

## (2) Regional

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

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, and the provision of services by other regional agencies. SCAG’s overarching strategy for achieving its goals is

integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, the 2020-2045 RTP/SCS' "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals and include, but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a 5-percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)<sup>1</sup> by 6 percent and the share of new job growth in HQTAs by 15 percent.

### (3) Local

#### (a) *City of Los Angeles General Plan*

The City's General Plan (General Plan),<sup>2</sup> originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,<sup>3</sup> including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the General Plan's land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects

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

<sup>2</sup> City of Los Angeles, Department of City Planning, *City of Los Angeles General Plan*, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed December 20, 2021.

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

on the environment. The elements that make up the General Plan are described in more detail below.

*(i) Framework Element*

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

(1) Land Use Chapter

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

(2) Housing Chapter

The overarching goal of the Framework Element's Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter recognizes that the distribution of housing in proximity to transit can reduce vehicle trips and provide residents with the opportunity to walk between their home, job, and/or neighborhood services. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

- Concentrating opportunities for new development in the City's Neighborhood Districts and in Community Centers, Regional Centers, and the Downtown Center, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards located near existing or planned major transit facilities and areas characterized by low-intensity or

marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and

- Focusing mixed uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

### (3) Urban Form and Neighborhood Design Chapter

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

### (4) Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

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<sup>4</sup> *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

### (5) Economic Development Chapter

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

### (6) Transportation Chapter

The Framework Element's Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies, and objectives that overlap with policies included in other chapters of the Framework Element regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

### (7) Infrastructure and Public Services Chapter

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

*(ii) Mobility Plan 2035*

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

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

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

*(iii) Conservation Element*

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

*(iv) Housing Element*

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting housing needs identified in the SCAG Regional



Housing Needs Assessment (RHNA). The 2021-2029 Housing Element, which was adopted on November 24, 2021, identifies the City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels;
- Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- Goal 5: A City that is committed to preventing and ending homelessness.

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

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development.<sup>5</sup> Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues, such as transportation, housing, environmental justice, and open space, among others. The plan includes Chapter 5, An Environment Where Life Thrives, which identifies the following environmental policies:

- Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.

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<sup>5</sup> *City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015.*

- Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.
- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

Included in this General Plan Element are policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State, regional, and local policies that call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

*(vi) Hollywood Community Plan*

The City's 1998 Hollywood Community Plan (Community Plan), which generally covers the neighborhoods of Hollywood, various Hollywood Hills communities, Los Feliz, East Hollywood, and Griffith Park, among others, is the land use element of the General Plan applicable to the Community Plan Area. The Community Plan implements the General Plan Framework Element and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. The specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Hollywood community within the framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

*(b) Los Angeles Municipal Code*

All development activity on the Project Site is subject to the City's Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City's

Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation.

*(c) Hollywood Redevelopment Plan*

Redevelopment Plans outline a community vision and revitalization opportunities within specific neighborhoods across the City. Each Redevelopment Project Area has a unique set of land use restrictions designed specifically to enhance the quality of life for the community. The Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986, and amended on October 31, 2003. The Redevelopment Plan was adopted to support the California Community Redevelopment Law and, as such, was designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under- or improperly utilized properties, eliminate “blight,” and improve the public welfare.<sup>6</sup>

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which involved challenging the constitutionality of ABX1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld ABX1 26, which, therefore, led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective in February 2012. ABX1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Hollywood Redevelopment Plan and its requirements for development within the Hollywood Redevelopment Project Area (Redevelopment Area) are still in effect.

As the City initially elected not to become the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed and the Governor of California appointed its three-member board to wind down the operations of the former CRA/LA. From 2012 to 2019, the DLA implemented and enforced the requirements of the Redevelopment Plan. On November 11, 2019, Ordinance No. 186,325 became effective, which transferred the DLA’s land use authority under the redevelopment plans to the City’s Department of City Planning and established a process by which the Department of City Planning would review projects for consistency with applicable redevelopment plan regulations.

According to the Redevelopment Plan, Regional Center Commercial uses shall generally provide goods and services, which are designed in a manner that appeals to a regional market, as well as to local markets, and includes uses, such as theaters,

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<sup>6</sup> *Community Redevelopment Agency of the City of Los Angeles, Redevelopment Plan for the Hollywood Redevelopment Project, as first amended on May 20, 2003 (Ordinance No. 175,236).*

restaurants, hotels, offices, and retail or service businesses.<sup>7</sup> Section 506.3 of the Redevelopment Plan also encourages the development of new and rehabilitated residential uses in the Regional Center Commercial Land Use designation. Development in the Regional Center Commercial designation is limited to a FAR of 4.5:1. As provided in Section 506.2.3 of the Redevelopment Plan, proposed development in excess of 4.5:1 FAR up to, but not to exceed, 6:1 FAR or such other density may be permitted if a specific development furthers the goals and intent of the Redevelopment Plan and Community Plan and meets certain objectives identified therein.

*(d) Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines, such as those found in Community Design Overlays.

## **b. Existing Conditions**

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

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three buildings and surface parking. The existing buildings on the Project Site comprise approximately 26,261 square feet of floor area consisting of a one-story, 16,932-square-foot commercial building along Sunset Boulevard and Wilcox Street/Cole Place, a one-story, 4,446-square-foot commercial office building along Wilcox Street, and a two-story, 4,883-square-foot commercial office building along Cole Place and De Longpre Avenue. Vehicular access to the parking areas of the Project Site is provided via curb cuts and driveways located on Wilcox Avenue and Cole Place. Pedestrian access

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<sup>7</sup> *Hollywood Redevelopment Plan, May 20, 2003.*

to the Project Site is provided via sidewalks located along the perimeter of the Project Site. The Project Site is relatively flat with limited ornamental landscaping.

As shown in Figure IV.E-1 on page IV.E-14, the Project Site is currently designated as Regional Center Commercial. Figure IV.E-2 on page IV.E-15 shows that the Project Site is zoned by the LAMC as C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). The C2 and C4 zones allow for a wide variety of land uses, including retail stores, offices, restaurants, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds. Height District 2 allows a 6:1 FAR in the Project Site's C4-zoned portions with no height or story limit. However, the Project Site is subject to a D Limitation, which limits the Project Site to a 2:1 FAR. The D Limitation does not impose any height limits on the Project Site. Height District 1XL allows a 1.5:1 FAR in the Project Site's C2-zoned portions with a 30-foot and two-story height limit. The Project Site is also located within a SCAG-designated HQTAs and TPAs pursuant to PRC Section 21099 and as set forth in the City's Zoning Information (ZI) File No. 2452.<sup>8</sup>

In addition, the Project Site is located within the boundaries of the Redevelopment Area. The Redevelopment Area encompasses approximately 1,107 acres and is bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Redevelopment Plan Map, included as Exhibit A.1 to the Redevelopment Plan, designates the Project Site for Regional Center Commercial land uses. This designation is consistent with the Community Plan's designation of Regional Center Commercial for the Project Site.

## (2) Surrounding Uses

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is located within a commercial area in the Hollywood Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development southeast of the Project Site, the Los Angeles Police Department (LAPD) Hollywood Station south of the Project Site, Los Angeles Fire Department (LAFD) Station 27 south of the Project Site, the 14-story CNN building east of the Project Site, and an 11-story office building west of the Project Site.

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<sup>8</sup> *The City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a Transit Priority Area, as defined in the City's Zoning Information File No. 2452.*



**LEGEND**

**RESIDENTIAL**

Low Medium II Residential

**COMMERCIAL**

Limited Commercial

Regional Center Commercial

**OPEN SPACE / PUBLIC FACILITIES**

Public Facilities

**Figure IV.E-1**

Land Use Designations on the Project Site



**LEGEND**

**GENERALIZED ZONING**

OS, GW

R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP

CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU

**Figure IV.E-2**

Zoning Designations on the Project Site



The uses surrounding the Project Site are designated as Regional Center Commercial, Limited Commercial, Low Medium II Residential, and Public Facilities and have varying zoning designations, including C4-2, C4-2D-SN, C1-1VL, and RD1.5-1XL.

### 3. Project Impacts

#### a. Thresholds of Significance

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

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

***Threshold (b): Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;***

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate impacts related to land use consistency:

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

#### b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382.



Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

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

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be consistent with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

### **c. Project Design Features**

No specific project design features are proposed with regard to land use.

### **d. Analysis of Project Impacts**

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

As discussed in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would develop a new building containing office and restaurant uses, a LADWP equipment area, and parking on the Project Site. All proposed development would occur within the boundaries of the Project Site. The proposed office and restaurant development would be consistent with the uses on the Project Site and immediately area surrounding the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community, and impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

#### ***Threshold (b): Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?***

## (1) Impact Analysis

### *(a) Local Plans and Applicable Policies*

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the applicable goals, objectives, and policies of the General Plan, including the Framework Element, the Mobility Plan, the Conservation Element, and the Hollywood Community Plan; the Citywide Design Guidelines; and the Hollywood Redevelopment Plan adopted for the purpose of avoiding or mitigating an environmental effect.

### *(i) Los Angeles General Plan*

#### (1) Framework Element

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

#### *(a) Land Use Chapter*

As previously discussed, the Framework Element's Land Use Chapter establishes districts, centers, and mixed-use boulevards, which are described by ranges of intensity/density, heights, and lists of typical use. The Project Site is located in an area that is identified as a Regional Center on the General Plan Framework's Long Range Land Use Diagram for the City's Metro area. As provided in the Land Use Diagram, a Regional Center is characterized as a focal point of regional commerce, identity and activity and contains a diversity of uses, such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Generally, different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6:1 and are characterized by 6- to 20-stories (or higher). As described in Section II, Project Description, of this Draft EIR, the Project includes the development of a 15-story commercial building with a maximum floor area ratio of 6:1. As such, the Project would be consistent with the type of use and at the intensity and height envisioned for a Regional Center. Specifically, the Project Site is located within the Hollywood Community Plan<sup>9</sup> area and has a Regional Center

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<sup>9</sup> *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>). (Footnote continued on next page)*

Commercial General Plan Land Use designation with the corresponding zones of C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). The C2 and C4 zones allow for a wide variety of land uses, including retail stores, offices, restaurants, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds.

Additionally, as detailed in Appendix E of this Draft EIR, the Project would support and would be consistent with the Land Use Chapter as it would contribute to the City's goal for a physically balanced distribution of land uses that facilitates 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, and assurance of environmental justice and a healthful living environment. In particular, the Project would promote a more balanced distribution of land uses with the replacement of an existing underutilized commercial building with office and restaurant uses that could be filled by a variety of tenants. These proposed uses would be developed in an area well-served by public transit, including numerous bus lines along Sunset Boulevard and the Metro B Line Hollywood/Vine Station located 0.4 mile from the Project Site. Furthermore, the Project would provide parking spaces and loading areas for employee carpools and vanpools, a protected bicycle storage facility, and EV charging infrastructure. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution, while supporting the City's objective to encourage new restaurant and office uses along primary transit corridors/boulevards and in designated Regional Centers. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

*(b) Urban Form and Neighborhood Design Chapter*

The Project would promote the City's goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project by contributing to the overall livability of the City. The Project Site is located in an area that is well served by transit and where activity is already concentrated. Consistent with policies related to Regional Centers, the Project would consist of a 15-story office building that would include ground-level commercial uses situated along pedestrian-oriented streets. In addition, the Project would replace the existing office and retail uses along with the associated surface parking area with a building that has been designed to complement its surroundings.

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*For purposes of this Draft EIR, the analysis is limited to the land use designations under the currently adopted Hollywood Community Plan.*

Specifically, the design of the building would incorporate a variety of architectural treatments, colors, and building materials, including non-reflective glass curtain walls, metal panels, black mullions, exposed black steel beams, polycarbonate cladding, board formed concrete, and a decorative screening element, to create articulation and visual interest consistent with the eclectic nature of the area. Landscaped outdoor terraces on the various upper levels and at the street level, including the approximately 21,465-square-foot landscaped deck located on the sixth level of the office building would further integrate the Project with the surrounding area. While the Project Site does not have front, side, or rear yards, the Project would incorporate transitions from the sidewalk to the ground floor uses and building entryways along Sunset Boulevard and Wilcox Street through the use of landscaped areas and canopies. As such, the Project would serve as a focus of activity for the surrounding community and a focus for investment in the community. The Project would also incorporate elements that promote individual and community safety, such as proper lighting of building entries and walkways to provide for pedestrian orientation, and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. Therefore, the Project would not conflict with the applicable objective that supports the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

*(c) Open Space and Conservation Chapter*

As discussed in Table 1 of Appendix E of this Draft EIR, one of the policies of the Open Space and Conservation Chapter is to seek new opportunities for private development to enhance the open space resources of the neighborhoods. The Project would not conflict with this policy as the Project would incorporate a variety of open space and amenities throughout the Project Site consisting of private landscaped outdoor terraces on the various upper levels.<sup>10</sup> Specifically, the Project would provide 61,449 square feet of private open space, of which 12,290 square feet would be landscaped and 49,159 would be hardscape. The primary open space area of the Project would be a large, 21,465-square-foot landscaped deck located on the sixth level of the commercial building. Therefore, as detailed in Appendix E of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter.

*(d) Economic Development Chapter*

The Project would support the City's objective to establish a balance of land uses that provides for commercial and industrial development which meets the needs of local

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<sup>10</sup> It should be noted that the Project is not required to provide residential open space as no residential units are proposed,

residents, sustains economic growth, and assures maximum feasible environmental quality and the associated policy to encourage new commercial development in proximity to rail and bus transit corridors and stations through the development of a mixed-use project with office and restaurant uses in an area well-served by public transit. The proposed office and restaurant uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Community Plan area, provide amenities to meet the needs of local residents, and serve to reduce VMT by locating jobs in an area well served by public transit, as previously discussed. Thus, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Economic Development Chapter.

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

The Project would support the City's policy and objectives pertaining to effective and efficient approaches to protecting water quality by implementing a site-specific Storm Water Pollution Prevention Plan during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as required by the City's LID Ordinance. Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Furthermore, as discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. In addition, as discussed in Section IV.J.2, Utilities and Service Systems—Wastewater and Infrastructure, of this Draft EIR, the Project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board, and the Los Angeles Bureau of Sanitation determined that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Infrastructure and Public Services Chapter.

#### (f) Conclusion

Based on the analysis above, the Project would not conflict with the relevant goals, objectives, and policies of the General Plan Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

#### (2) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 2 of Appendix E of this Draft EIR. As detailed

therein, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would also support the City's policy to ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment by constructing all access points in accordance with City requirements and providing ground level restaurant spaces that promote pedestrian activity.

During operation, the Project would further promote the City's policy to recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes, as integral components of the City's transportation system by providing adequate vehicular and pedestrian access and providing bicycle facilities. Specifically, the Project would provide 141 bicycle parking spaces, including 92 long-term spaces and 49 short-term spaces in a bicycle parking facility and other areas located within the ground level of the Project. The Project would also enhance pedestrian activity along Sunset Boulevard and Wilcox Avenue through building design and proposed streetscape amenities by providing ground-level, restaurant uses, as well as new landscaping. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project would provide all guests, employees, and patrons of the on-site uses convenient access to transit services. The Project would also include a Transportation Demand Management (TDM) Program in accordance with the City's TDM Ordinance that would promote alternative modes of transportation, including bicycles and carpooling. As such, the Project would result in fewer vehicle trips. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect.

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

As identified in Subsection 2.a.(1)(a)(iii), the Conservation Element addresses the preservation, conservation, protection, and enhancement of the City's natural resources and recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Project's consistency with the Conservation Element is analyzed below.

As discussed in the Initial Study included in Appendix A of this Draft EIR, the Project Site is currently developed with three buildings and surface parking lot and does not contain any natural resources. Landscaping within the Project Site is limited to common ornamental trees, and common grasses and shrubs. These existing trees and shrubs consist of various non-native species that are not subject to the City of Los Angeles

Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 186873).<sup>11</sup> Additionally, as further discussed in the Initial Study included as Appendix A of this Draft EIR, no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas.

With respect to historic resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the buildings on the Project Site are not considered historic resources as defined by CEQA, and, therefore, direct impacts to on-site historical resources would be less than significant. Three historic resources are located in the immediate vicinity of the Project Site, as identified in Section IV.B, Cultural Resources. These include Fire Station No. 27, the commercial buildings at 6464 W. Sunset Boulevard and 1501 N. Cahuenga Boulevard, and the De Longpre Park Residential Historic District. These nearby historical resources would not be demolished, relocated, or altered by the Project. Although the Project would introduce increased height and density to the Project Site, the Project would not block any important views of the three nearby historical resources. Thus, the Project would not result in indirect impacts to these off-site historical resources that involve alteration to the surroundings, removal of historic features or spaces, or substantial impairment or obscurement of the ability of the resource to convey its historical significance. In addition, as discussed in Section IV.F, Noise, of this Draft EIR, the Project would not result in significant vibration impacts associated with building damage to off-site buildings, including the nearby historical resources. Therefore, the Project would not result in indirect impacts that would result in a substantial adverse change in the significance of a historic resource and indirect impacts would also be less than significant.

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

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<sup>11</sup> *The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 186873) protects Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species and Mexican Elderberry and Toyon shrubs that are native to Southern California, and excludes trees or shrubs grown by a nursery or trees planted or grown as part of a tree planting program.*

#### (4) Hollywood Community Plan

The Project's general consistency with the applicable objectives and policies set forth in the Hollywood Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 3 of Appendix E of this Draft EIR.

As discussed in detail in Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals of the Community Plan. Specifically, the Project would support the City's objective to provide adequate supporting public services and utilities, to coordinate the phasing of public facilities with private development, and to encourage open space and parks in both local neighborhoods and in high density areas. As discussed in Section IV.G.1, Public Services—Fire Protection; Section IV.G.2, Public Services—Police Protection; Section IV.G.3, Public Services—Libraries; Section IV.H, Transportation; Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure; Section IV.J.2, Utilities and Service Systems—Wastewater; and Section IV.J.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities serving the Project Site would have capacity to serve the Project. The Project also includes a LADWP equipment area that would include electrical distribution equipment and emergency generators within the De Longpre Lot. Specifically, on the north side of the De Longpre Lot an approximately 18-foot-tall, 3,550-square-foot enclosure would be constructed to house electrical equipment, building life safety generator, tenant back-up generators, and switchgear with adjacent exterior LADWP transformer yard surrounded by a protective 8-foot high fence with landscaped enhancements. In addition, as previously discussed, although the Project is not required to provide open space areas, the Project would provide approximately 61,449 square feet of private open space, which would reduce the potential for additional demand to be placed on public parks and open space areas in the vicinity of the Project Site.

Additionally, consistent with the Community Plan's objective for the Hollywood Center area that future development be compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system, the Project's proposed office and restaurant uses would be compatible with the existing surrounding residential and commercial development. In addition, the LADWP equipment area proposed as part of the Project would also be designed to be compatible with surrounding uses as it would feature a minimalist design with a muted color palette and a green wall-type screen to enclose LADWP equipment. Furthermore, the Project's proximity to existing transit infrastructure, provision of bicycle parking spaces, and design features that promote walkability would ensure compatibility with the existing transportation and circulation system. Overall, the Project would not conflict with the applicable goals,



objectives, and policies set forth in the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

*(ii) Citywide Design Guidelines*

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

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

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, the ground floor of the proposed office building would be designed to be transparent glass, activating the streetscape with an active restaurant use, as well as a coherent, uniform architectural design. The Project would include planted areas along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. In addition, the Project would include low-level exterior lights adjacent to both the office building and the LADWP equipment area and along pathways that would serve to enhance the safety of pedestrians at night. Internal to the Project Site, the Project would include landscaped planters and designated pedestrian walkways to minimize vehicular/pedestrian conflicts. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

The Project includes six driveways to meet the various needs of the Project, including separate driveways for office tenants, rideshare and valet users, loading and trash operations, and for access to the LADWP equipment area. Two driveways would be located on Wilcox Avenue and four driveways would be located on Cole Place, a non-arterial road. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. The Project design would also maximize the use of existing curb cuts to the extent feasible and create a new curb cut along Wilcox Avenue. In addition, as previously described, the Project would include new landscaping along the Project Site perimeter to enhance the pedestrian experience. There are also currently no curb cuts along Sunset Boulevard that the Project could use; similarly, the Project would not include new curb cuts along Sunset Boulevard, thereby maintaining the primary pedestrian walkway.

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

As noted above, the Project would activate the ground floor along the primary street frontage (Sunset Boulevard) by introducing an active restaurant use. The Project ground floor would be designed to be transparent glass, activating the streetscape with an active use along Sunset Boulevard, as well as a coherent, uniform architectural design featuring large floor-to-ceiling glazing and pedestrian oriented signage. The Project would include planted areas along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The Project Site is within a vibrant commercial area in the Hollywood Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development southeast of the Project Site, the LAPD Hollywood Station and the LAFD Station 27 south of the Project Site, the 14-story CNN building east of the Project Site, and an 11-story office building west of the Project Site. The Project would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The Project in particular would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood.

Guideline 5: Express a clear and coherent architectural idea

The Project incorporates design elements consistent with other surrounding buildings in Hollywood, including exterior balconies, an industrial aesthetic, raw, exposed concrete interiors similar to the utilitarian nature of production spaces, and a decorative crown element, which may include timber, reminiscent of the wood truss roofs used in sound stages, while providing a new contemporary glass façade structure with various repeating rectangle forms, creating a distinctive character. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. The Project design would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would complement the surrounding neighborhood. The Project would include design elements that would contribute to the neighborhood's vibrant commercial energy and supportive of pedestrian circulation, including ground level transparent glass

windows , which would contribute to an inviting and pedestrian-oriented streetscape along Sunset Boulevard. The Project would also include a large landscaped outdoor deck, pulling back the building massing along Sunset Boulevard.

Overall, relative to the surrounding development, the Project design would complement the varying design elements of the commercial uses adjacent to the Project Site.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As previously discussed, the Project would enhance the streetscape adjacent to the Project Site by implementing an active ground floor restaurant use that would be transparent glass. The Project would also include planted areas along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. In addition, the Project would include low-level exterior lights adjacent to the buildings and along pathways that would serve to enhance the safety of pedestrians at night.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project would develop one commercial building that would include office uses and ground floor restaurant uses, as well as a LADWP equipment area. The Project's commercial building would be concentrated along Sunset Boulevard, which is an active primary arterial. The proposed LADWP equipment area would be located along the southeastern portion of the Project Site, along a less active street. This arrangement of building and uses would ensure that pedestrian activity remains along an active pedestrian corridor. In addition, internal to the Project Site, pedestrian pathways would be provided along all driveways to minimize pedestrian-vehicular conflicts. The Project would also include 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 the commercial buildings.

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

The Project Site is located in an urbanized area and is currently developed with office and retail uses and associated parking. There are no natural resources or features on the Project Site. Landscaping within the Project Site and along adjacent streets is limited to ornamental shrubs and trees. The Project Site currently includes four onsite trees and 12 street trees that will all be removed and replaced at a 1:1 and 2:1 ratio, respectively. As discussed further below, none of the trees within the Project Site and in

the adjacent public right-of-way are considered protected by the City. The Project would include 30 trees, including 24 new streets trees.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Gold certification under the U.S. Green Building Council's LEED® Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code. A project that is LEED-certified is designed to reduce impacts on the environment in terms of its construction and operation. The way the site would be configured would reduce energy and water usage along with waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. Specifically, the Project would incorporate sustainability features for alternative, low-carbon modes of transportation, such as a protected bicycle storage facility and electric vehicle charging infrastructure. The Project would also incorporate water conservation features through low-water use plant selections and ultra-low flow indoor water fixtures. Additionally, as previously mentioned, the Project would include exterior and interior lighting that would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24, version 2019 and the National Electrical Code.

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

The Project would manage stormwater through a capture and reuse system. This system would capture stormwater runoff that would then be used for irrigation of the new landscaping around the Project Site. Areas of collection would include rooftops, green area, and paved surfaces. In addition, the Project proposes landscaped terraces that can serve as capture mechanisms. The captured stormwater would be routed via subgrade conveyance pipes, and the water would be connected to the LID system.

*(iii) Hollywood Redevelopment Plan*

The Project Site is currently designated as Regional Center Commercial by both the Community Plan and the Redevelopment Plan. The Project would construct a mixed-use development consisting of office and restaurant uses. According to Section 506.2 of the Redevelopment Plan, Regional Center Commercial uses shall generally provide goods and services which are designed in a manner that appeals to a regional market, as well as to local markets, and includes uses, such as theaters, restaurants, hotels, offices, and retail or

service businesses. Thus, the types of land uses proposed by the Project would be consistent with the existing Regional Center Commercial land use designation.

As set forth in Section 506.2.3 of the Redevelopment Plan, the Regional Center Commercial designation allows development at a FAR of 4.5:1 and imposes additional standards for approving projects with FARs of up to 6:1. As discussed in Section II, Project Description, of this Draft EIR, the Project includes a total floor area, per the LAMC, of 443,418 square feet with a FAR of 6:1; however, for conservative analysis purposes, this Draft EIR assumes a total floor area of 445,218 square feet. In order to permit a FAR of 6:1, the Project has requested a Height District Change from Height 1XL and 2D to Height District 2. As provided in Section 506.2.3 of the Redevelopment Plan, proposed development in excess of 4.5:1 FAR up to but not to exceed 6:1 FAR or such other density may be permitted if a specific development furthers the goals and intent of the Redevelopment Plan and Community Plan and meets objective “a” and at least one of the following objectives:

- a. To concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs;
- b. To provide for new development which compliments the existing buildings in areas having architecturally and/or historically significant structures or to encourage appropriate development in areas that do not have architecturally and/or historically significant buildings;
- c. To provide focal points of entertainment, tourist or pedestrian oriented uses in order to create a quality urban environment;
- d. To encourage the development of appropriately designed housing to provide a balance in the community;
- e. To provide for substantial, well designed, public open space in the Project Area; and
- f. To provide social services or facilities for social services which addresses the community’s needs.

The Project would meet objective “a” as it would include the development of a 15-story commercial building that would be located in an area with an established street network comprised of highways and roads. In addition, the Project Site is located in proximity to a variety of public transit options. In particular, the Project Site is located 0.4 miles from the Metro B Line Hollywood/Vine Station. The Project Site is also served by several Metro local bus lines and Los Angeles Department of Transportation (LADOT) DASH bus lines. The Project would also include a TDM Program in accordance with the

City's TDM Ordinance to reduce vehicle trips to and from the Project Site. The Project would also meet objective "b", as it complements the existing buildings in the area in terms of scale and massing, and would also be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood.

Section 300 of the Redevelopment Plan sets forth 16 goals for the Redevelopment Plan. Of these, the relevant goals applicable to the Project include:

- Goal 5—Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms, such as:
  - a) adopting land use standards;
  - b) promoting architectural and urban design standards, including standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances;
  - c) promoting landscape criteria and planting programs to ensure additional green space;
  - d) encouraging maintenance of the built environment;
  - e) promoting sign and billboard standards;
  - f) coordinating the provision of high quality public improvements;
  - g) promoting rehabilitation and restoration guidelines;
  - h) integrate public safety concerns into planning efforts.
- Goal 12—Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.

The Project would contribute to these goals. Specifically, the Project would support Goal 5 as it would enhance the built environment in the surrounding neighborhood and upgrade the quality of development over existing Project Site conditions. Specifically, the proposed commercial building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood.

The Project would also enhance the streetscape by installing landscaping, including new street trees. In addition, the Project would implement several safety features, such as an enhanced closed-circuit camera system and keycard or guarded entry. Proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the commercial building. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Finally, entrances to, and exits from the building, would be designed to be open and in view of surrounding sites. Furthermore, the Project would support Goal 12 by promoting the use of public transportation and a reduction in VMT by concentrating new development in a designated TPA. Specifically, Metro and LADOT would provide a variety of transit options to Project employees and visitors, including bus lines and the Metro Hollywood/Vine Station located 0.4 mile from the Project Site. The Project would also provide a total of 141 bicycle parking spaces, including 92 long-term spaces and 49 short-term spaces that would promote the use of alternative transportation. Based on the analysis above, the Project would not conflict with the applicable goals of the Redevelopment Plan adopted for the purpose of avoiding or mitigating an environmental effect.

*(b) SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in detail in Table 4 of Appendix E of this Draft EIR. As detailed therein, the Project would be generally consistent with the whole of applicable goals set forth in the 2020-2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020-2045 RTP/SCS to enhance the preservation of the regional transportation system, increase person and goods movement and travel choices within the transportation system, as well as support healthy and equitable communities, by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a TPA. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles and designated parking spaces and loading areas for employee carpools and vanpools, thereby supporting the goal to promote alternative parking strategies. As such, the Project would maximize mobility and accessibility, and also facilitate a reduction in VMT, by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. In so doing, the Project would also

support the goal of adapting to a changing climate and supporting an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS.

*(c) Conclusion*

**Based on the analysis provided above, the Project would not conflict with the whole of applicable goals, objectives, and policies in local and regional plans that were adopted to avoid or mitigate an environmental effect. As such, impacts related to conflicts with land use plans would be less than significant.**

**(2) Mitigation Measures**

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

**(3) Level of Significance After Mitigation**

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

**e. Cumulative Impacts**

**(1) Impact Analysis**

*(a) Physically Divide a Community*

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 55 related projects in the vicinity of the Project Site, as well as the Hollywood Community Plan Update.<sup>12</sup> The related projects generally consist of infill development and redevelopment of existing uses. As such, similar to the Project, the proposed construction associated with the related projects would be confined to the related project sites and would not physically divide an established community. The uses proposed by the related projects, including multi-family residential, commercial, office, and hotel uses would also be compatible with the various developments planned throughout Hollywood, as well as with

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<sup>12</sup> *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>). Under the current draft released in February 2021, the Project Site's land use designation is proposed to be Regional Center Commercial, with a proposed zone of [Q]C2-2D-SN-CPIO and [Q]C2-2D-CPIO. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Hollywood Community Plan.*



existing uses. **As such, cumulative impacts related to the physical division of an established community would be less than significant.**

*(b) Conflict with Applicable Goals, Objectives, and Policies Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect*

As with the Project, the related projects would be required to comply with relevant land use policies and regulations. Therefore, as with the Project, the related projects would not conflict with applicable land use plans. Specifically, as with the Project, related projects would be required to comply with certain regulations and City goals, objectives, and policies to reduce emissions during construction, as well as using clean materials and energy efficient appliances, consistent with the City's Green Building Code. In support of the City's goal to reduce VMT, it is anticipated that the related projects would also implement various methods to promote alternative modes of transportation, including providing bicycle parking spaces, which is a City requirement. Therefore, as discussed above, since the Project would not conflict with land use plans and since the related projects would be required to comply with applicable regulatory requirements, the Project's contribution to land use impacts would not be cumulatively considerable. **As such, overall cumulative impacts related to conflicts with land use plans, regulations, goals, objectives, or policies would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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