

IV. Environmental Impact Analysis

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. The Project’s potential impacts related to the potential physical division of an established community were fully evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR. 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 (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 2022 Scoping Plan, the Los Angeles Green Building Code, and the Green New Deal; Section IV.H, Transportation (and the Transportation Assessment included as Appendix I.1 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 (LADWP) Urban Water Management Plan (UWMP). Project consistency with the Southern California Association of Governments (SCAG) 2020–2045 RTP/SCS is evaluated in this section and also in Sections IV.A, Air Quality, and IV.D, Greenhouse Gas Emissions, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65300 et seq.
- 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
- Central City Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- Downtown Design Guide: Urban Design Standards and Guidelines
- Freeway Adjacent Advisory Notice for Sensitive Uses (ZA-2427)

(1) State

(a) California Government Code Section 65300 et seq.

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

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals to reduce greenhouse gas (GHG) emissions 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 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. See Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, for further discussion of SB 375.

(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.”

The Project Site is located on an infill site, as defined in PRC 21099(a), because the Project Site consists of a lot located within an urban area that has been previously developed. The Project Site is also located within a transit priority area (TPA), as defined in PRC Section 21099(a)(7), because it is located within 0.5 mile of an existing “major transit stop.” The Project Site is located adjacent to an existing major transit stop, the Metro 7th Street/Metro Center Station, which provides access to the Los Angeles County Metropolitan Transportation Authority (Metro) B (Red), D (Purple), A (Blue), and E (Expo) Lines, as well as numerous local and regional bus lines. Therefore, the Project Site is located in a TPA as defined in PRC Section 21099. The City’s Zone Information and Map

Access System (ZIMAS) also confirms the Project Site's location within a TPA as defined in the ZI No. 2452.¹

(2) Regional

(a) *Southern California Association of Governments 2020–2045 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 toward 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 2020–2045 RTP/SCS' "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)² by 6 percent and the share of new job growth in HQTAs by 15 percent. See Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, of this Draft EIR, for further discussion of the 2020–2045 RTP/SCS.

¹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

² 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.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),³ 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,⁴ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's 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's 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

³ *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan.*

⁴ *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).*

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.⁵ 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

⁵ *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

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.

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

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

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

(iii) Conservation Element

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

(iv) Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The 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 and preserve 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 committed to preventing and ending homelessness.⁶

⁶ *City of Los Angeles, Los Angeles Housing Element 2021–2029, p.242, 2021.*

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

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. 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.
- 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) Central City Community Plan

The City's 2003 Central City Community Plan (Community Plan), which covers Central City area, is the land use element of the General Plan applicable to the Project Site 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 Community Plan identifies and provides for economic opportunities and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Community Plan area.

The Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:⁷

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

(vii) Downtown Community Plan (DTLA 2040 Plan)

The City of Los Angeles Department of City Planning is currently updating the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the Downtown Community Plan (DTLA 2040 Plan). The DTLA 2040 Plan was approved by the City Planning Commission (CPC) on September 23, 2021. On May 3, 2023, the City Council voted to approve the DTLA 2040 Plan and a zoning code update for the plan areas. However, the City attorney must review and finalize the implementing ordinances before they can be considered for final adoption by the City Council, and the DTLA 2040 Plan has not yet gone into effect.

The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully

⁷ Page II-2 of the Central City Community Plan, 2003.

accommodating projected future growth.⁸ Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:⁹

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

As currently provided by the DTLA 2040 Plan, the Project Site will be designated as part of the Transit Core land use designation, which corresponds to the Project Site's proposed zone, which will allow a maximum floor area ratio (FAR) between 9:1 and 13:1, with general uses that include multi-family residential, regional retail and services, office, hotel, and entertainment uses.¹⁰ The DTLA 2040 Plan provides the following description of the Transit Core area:¹¹

Transit Core areas are dense centers of activity built around regional transit hubs that provide easy access for pedestrians, transit users, and cyclists to a variety of experiences and activities. These places provide a high-energy urban experience, with towers activated by ground-floor retail that engages and invites pedestrians. Buildings have high-quality design and provide visual interest. Enhanced streetscapes, paseos, and alleys create a seamless

⁸ City of Los Angeles, *Downtown Los Angeles Community Plan Update, About*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about>, accessed March 13, 2023.

⁹ City of Los Angeles, *Downtown Los Angeles Community Plan Update, Purpose*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about>, accessed March 13, 2023.

¹⁰ Los Angeles Department of City Planning, *Downtown Los Angeles Community Plan Update (DTLA 2040)*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed March 13, 2023.

¹¹ City of Los Angeles, *Downtown Community Plan, June 2019 Draft*.

network of walkable paths that balance the high-intensity built environment. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock.

The DTLA 2040 Plan will be the first Community Plan to apply new zoning as part of the City's comprehensive Zoning Code update. The DTLA 2040 Plan will inform developers and homeowners of allowable development options, densities, and intensities; and outline strategies for how to accommodate planned growth.

(b) Los Angeles Municipal Code

All development activity on the Project Site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation.

(i) Greater Downtown Housing Incentive Area

The Greater Downtown Housing Incentive Area was created by Ordinance No. 179,076. Incentives offered to produce housing in this area are set forth in LAMC Section 12.22 (c) and include limited restrictions on yard and open space requirements and reduced parking requirements. Floor area bonuses also are permitted in this area, as set forth in LAMC Section 12.22 29 (b). However, as the Project Applicant is not proposing affordable dwelling units or seeking a density bonus as part of the Project, the development incentives allowed in the Greater Downtown Housing Incentive Area would not apply to the Project.

(c) Citywide Design Guidelines

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

organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

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

On April 24, 2009, the Los Angeles City Council approved a General Plan Amendment to the Central City Community Plan to revise Chapter V of the Central City Community Plan text to incorporate the Downtown Design Guide (DDG). The DDG was created to implement common design objectives that maintain neighborhood form and character while promoting design excellence, creative infill development solutions, and sustainable development practices and innovations. As such, the DDG encourages the development of an increasingly livable and sustainable Downtown community. The DDG focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The successful treatment of these key features, coupled with particular attention to the details of a project within the first 30 to 40 vertical feet, forms the basis for providing high quality development at a human scale. The updated DDG was adopted by the City Planning Commission in June 2017 as an official guide for development within the Downtown area.

(e) Freeway Adjacent Advisory Notice for Sensitive Users (ZA-2427)

Zoning Information File 2427 (ZI No. 2427) provides design and siting guidelines for discretionary residential projects and sensitive uses (i.e., schools, day care centers, and senior care centers) located within 1,000 feet of a freeway. ZI No. 2427 requires all projects seeking discretionary approval for which findings must be made regarding conformance to the General Plan to adhere to the Citywide Design Guidelines, including those that address freeway proximity. According to ZIMAS, the Project Site is located within the ZI No. 2427 area of the State Route 110 (SR-110) Freeway.¹²

(f) Enterprise Zone/Employment and Economic Incentive Program Area (ZI No. 2374)

Enterprise Zones (EZs) are specific geographic areas designated by City Council resolution and have received approval from the California Department of Commerce under either the Enterprise Zone Act Program or Employment And Economic Incentive Act

¹² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144 010 401, 405, 408, 421, 422, 423, and 425.

Program.¹³ The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services.

b. Existing Conditions

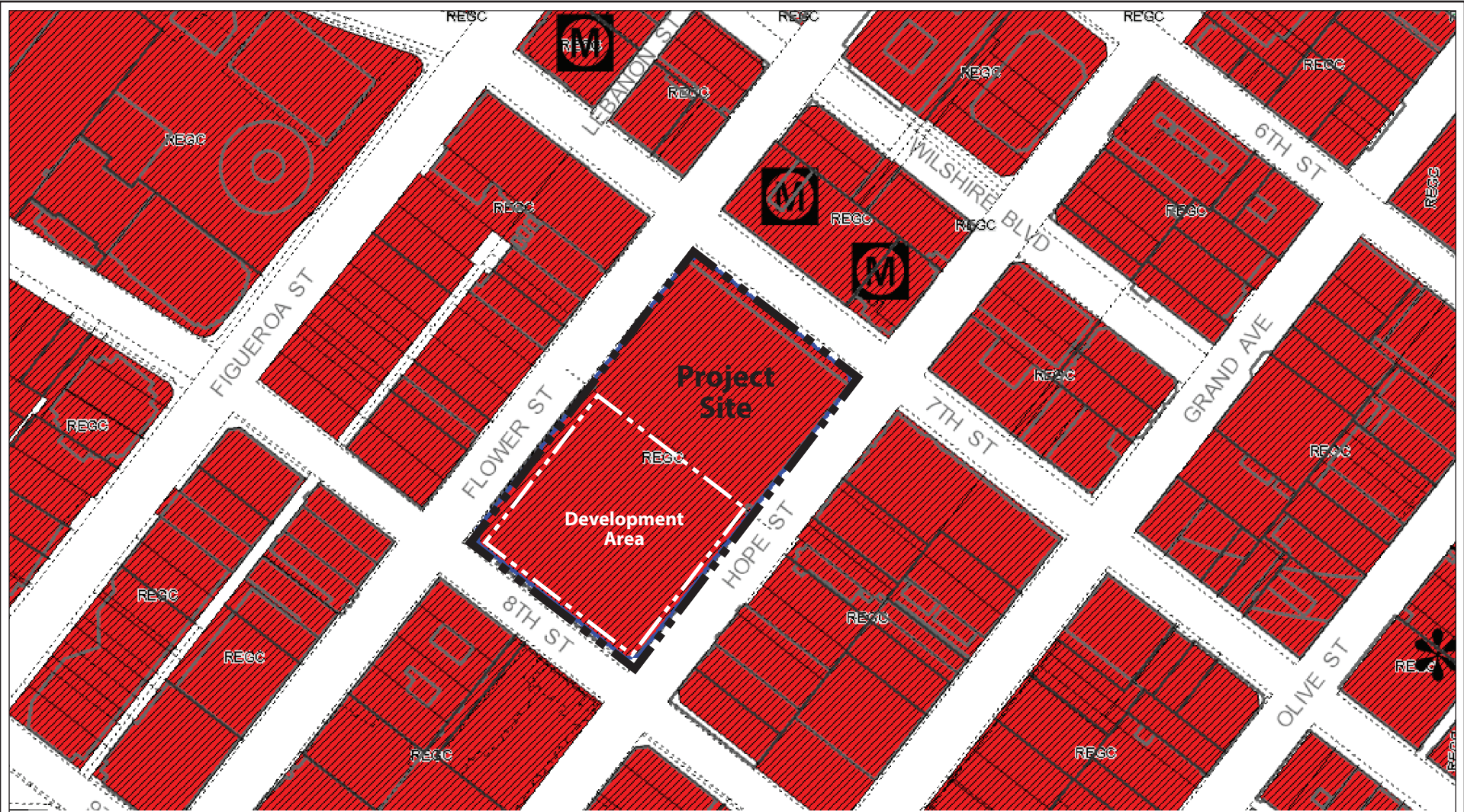
(1) Project Site

As discussed in Section II, Project Description of this Draft EIR, the Project Site is currently occupied by a mixed-use development known as The Bloc. The northern portion of the Project Site (outside of the Development Area) contains an office tower, a high-rise hotel (Sheraton), commercial/retail uses and an expansive plaza that includes a portal that provides access to the Metro 7th Street/Metro Center Station, which provides direct access to the Metro B (Red), D (Purple), A (Blue), and E (Expo) Lines and is considered a hub for the regional rail network. The southern portion of the Project Site constitutes the Development Area and is currently developed with an existing nine-story parking/retail podium building, which includes five stories of enclosed parking, four stories of existing commercial/rail floor area, and rooftop parking. The Project Site also has two existing basement levels below the podium building, which consist of one level of vehicle parking and one level of loading areas and gym/fitness use. Existing uses within The Bloc comprise approximately 1,424,314 square feet of floor area comprised of 656,423 square feet of office space, 28,599 square feet of medical office space, 269,622 square feet of retail uses, 23,180 square feet of restaurant/dining areas, 30,363 square feet of fitness uses, a 28,770-square-foot theater that includes 569 fixed seats, and a 387,357-square-foot hotel that includes 496 rooms and 25,282 square feet of meeting/banquet spaces. The Project Site also includes approximately 1,971 parking spaces.

As shown in Figure IV.E-1 on page IV.E-16, the Project Site is located within the planning boundary of the Central City Community Plan and has a general plan land use designation of Regional Center Commercial.

As shown in Figure IV.E-2 on page IV.E-17, the Project Site is zoned C2-4D (Commercial Zone, Height District 4 with Development Limitations). The “C2” denotes the Commercial Zone pursuant to LAMC Section 12.14., which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home

¹³ *Legislative action resulted in the repeal of the Enterprise Zone Act and the dissolution of Enterprise Zones, effective December 31, 2013. However, the parking reduction provisions of the Enterprise Zone are still in effect (www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml).*

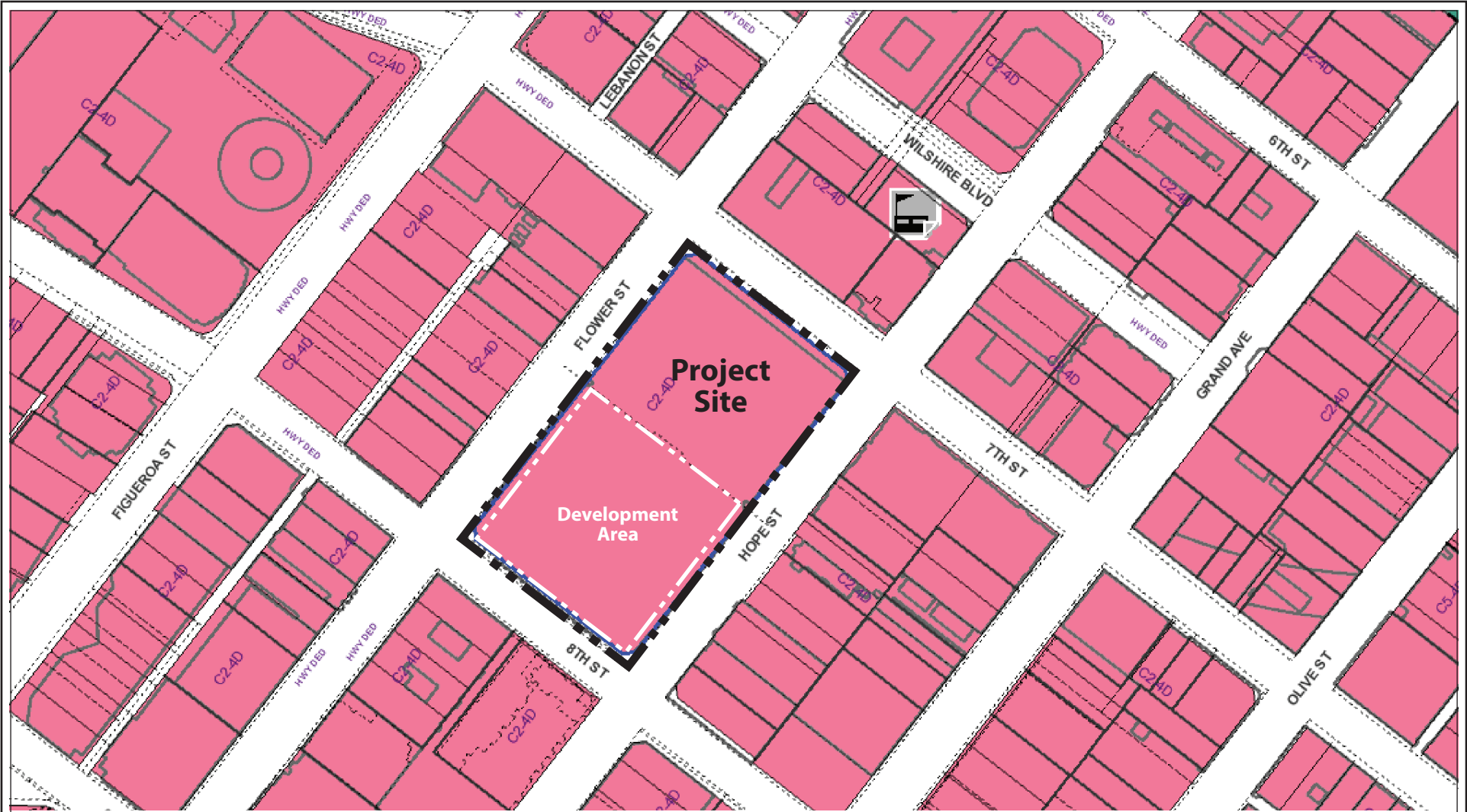


LEGEND

GENERAL PLAN LAND USE

 Regional Center Commercial

Figure IV.E-1
Land Use Designations on the Project Site



LEGEND GENERALIZED ZONING
 C2

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

occupations. The number “4” in the Project Site’s zone designation of C2-4D denotes Height District 4 which allows unlimited height and a maximum FAR of 13:1. The “D” denotes the D Limitation, enacted under Ordinance 164,307 (Subarea 1915) effective January 30, 1989, which limits FAR to a maximum of 6:1 with some exceptions, including the Transfer of Floor Area Rights (TFAR), which allows property owners to sell their floor area rights to other parcels.

As identified by ZIMAS, the Project Site is also located within the DDG Project Area, Transit Priority Area (TPA), Metro Right-of-Way Project Area, the Freeway Adjacent Advisory Notice for Sensitive Uses, the Greater Downtown Housing Incentive Area, the Los Angeles State Enterprise Zone, and within the boundaries of the Downtown Streetcar.¹⁴

(2) Surrounding Uses

The area surrounding the Project Site is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (office, retail and restaurant), multi-family residential, institutional, and parking uses. Properties immediately adjacent to the Project Site are zoned C2-4D with a Regional Center Commercial land use designation. Properties to the north of the Project Site along 7th Street are developed with the mid-rise Roosevelt Lofts and 655 Hope Condos adaptive reuse buildings. These multi-story, mixed-use buildings contain ground floor commercial uses that include various dining establishments. Properties to the south of the Project Site along 8th Street are improved with two multi-story mixed-use buildings with ground floor commercial uses (8th+Hope Apartments and the Gas Company Lofts). Properties to the east of the Project Site along Hope Street are improved with mid-rise commercial and retail buildings, a small religious structure (the Third Church of Christ, Scientist of Los Angeles Reading Room), and parking facilities.¹⁵ Properties to the west of the Project Site along Flower Street are improved with two multi-story parking garages, a surface parking lot, and a multi-story office building with ground floor commercial uses that include dining establishments.¹⁶ In addition, construction of a 41-story mixed-use building is underway at the intersection of Figueroa Street and 8th Street. In the Project vicinity, beyond these land uses, are numerous low- mid- and high-rise commercial and residential buildings that form the Downtown skyline.

¹⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144 010 401, 405, 408, 421, 422, 423, and 425.

¹⁵ A portion of this property is proposed to be redeveloped with a 50-story mixed-use development with 580 residential dwelling units and ground level commercial uses, per Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR.

¹⁶ A portion of this property is proposed to be redeveloped with a new 41-story mixed use tower, per Case No. Case No. CPC-2016-1950-TDR-SPR-1A.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community;

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

As discussed further below, the Initial Study prepared for the Project, and included as Appendix A of this Draft EIR, determined that the Project would result in a less-than-significant impact related to the Project's potential to physically divide an established community (Threshold (a)). For the remaining threshold, the Appendix G Thresholds provided 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.

The Project's consistency with applicable goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Housing Element, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), Central City Community Plan; DTLA 2040; LAMC (Zoning Code); Citywide Design Guidelines; and DDG is discussed in the impact analysis below and Appendix E. 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. As discussed in the Office of Planning and Research (OPR) State of California General Plan Guidelines (2017), 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. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, State law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.¹⁷

c. Project Design Features

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

d. Analysis of Project Impacts

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

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, and summarized in Section VI, Other CEQA Considerations, of this Draft

¹⁷ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

EIR, the proposed uses and high-rise building would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site. Furthermore, the Project Site is fully built out, and the Project does not propose a freeway or other large infrastructure that could 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 land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) Consistency with Regional Plans

(i) Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in Table 1 of Appendix E of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. The Project would support the goals of the 2020–2045 RTP/SCS related to improving mobility and accessibility, maximizing the productivity of transportation systems, supporting healthy and equitable communities by improving air quality and promoting active transportation (e.g., bicycling and walking), and encouraging energy efficiency. Specifically, as detailed in Table 1 of Appendix E of this Draft EIR, the Project would increase urban density on an already developed urban infill site in a City-designated TPA¹⁸ and SCAG-designated HQTA¹⁹ in close proximity to jobs, shopping, services, and transit (including an on-site Metro 7th Street/Metro Center Station portal) and would be served by an established network of roads and freeways.

Furthermore, the Project would provide: (1) bicycle parking facilities in compliance with LAMC requirements to promote the use of bicycles; (2) pedestrian enhancements,

¹⁸ 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 APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

¹⁹ SCAG, *Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, High Quality Transit Areas (2045), Exhibit 3.8, adopted September 3, 2020.*

including, but not limited to, replacement of street trees and enhanced sidewalk paving along a 190-foot portion of Hope Street, a new residential entrance, a new storefront for the relocated retail space, and the relocated pedestrian passageway to the interior retail plaza, which are all at the ground level along the Hope Street frontage of the existing podium building; (3) a Sign Supplemental Use District (Sign District) for signage that would include digital displays, non-digital signs, and digital kiosks, among others, and including both on-site and off-site content, which would activate and enhance pedestrian activity; (4) 30 percent of the new parking spaces capable of supporting future electric vehicle supply equipment (EVSE) and 10 percent of the new parking spaces equipped with electric vehicle (EV) charging stations;²⁰ (5) reserved area for future solar PV panel on roof plus conduit for wiring; (6) landscaped roof terraces; and (7) energy saving technologies and appliances pursuant to Project Design Feature GHG-PDF-1.

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. Specifically, “Green” principles are incorporated within new construction in the Development Area to comply with the City of Los Angeles Green Building Code (standards and the sustainability intent of the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED®) program) to meet the standards of LEED Silver® or equivalent green building standards. Furthermore, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would be required to comply with the City’s All-Electric Ordinance, which does not allow installation of natural gas-powered equipment (stoves, water heaters, space heating) within residential uses. As such, the Project would support the reduction in GHG emissions, encourage the use of alternative modes of transportation (i.e., walking, biking, public transit), and reduce dependency on single-occupancy vehicles. Therefore, the Project would not conflict with the applicable goals and principles of the 2020–2045 RTP/SCS.

(b) Consistency with Local Plans and Applicable Policies

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

²⁰ *The parking spaces capable of supporting future EVSE and the parking spaces equipped with EV charging stations would apply to the new parking spaces on the new parking levels.*

(i) City of Los Angeles General Plan(1) Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 in Appendix E of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

The Framework Element's Land Use Diagrams designate districts, centers and mixed-use boulevards. As discussed above, the Project Site is located in an area that is identified as the Downtown Center on the Framework Element's Long Range Land Use Diagram for the City's Metro area. The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by adding a new high-density residential development to an existing mixed-use development containing hotel and commercial uses, as well as associated parking and Sign District signage as set forth below.

The Project would support the City's policy to provide for the siting and design of new development that enhances the character of commercial districts by introducing uses similar to and compatible with the mix of land uses surrounding the Project Site and creating additional housing to meet a growing demand in the Downtown Center. Additionally, the Project would focus the proposed high-density development along a commercial corridor that is characterized by commercial uses and a high degree of pedestrian activity.

The Project would also support the City's objective to 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, where the residents' quality of life can be maintained or improved. Specifically, because the Project Site does not contain any existing residential use and is located in an area characterized by a wide variety of commercial and multi-family residential uses, the Project would not displace existing housing or intrude into an existing established residential neighborhood. The Project would provide high-density multi-family residential uses integrated with an existing mixed-use hotel and commercial development, on a site already served by public infrastructure and services and services. Residents of the Project and surrounding area would be provided streetscape improvements that would improve the pedestrian environment, including, but not limited to, an enhanced sidewalk paving along Hope Street, new replacement street trees, a new storefront for the relocated retail space, and the relocated pedestrian

passageway to the interior retail plaza. The Project also proposes a Sign District for signage that would include digital displays, non-digital signs, and digital kiosks, among others, and including both on-site and off-site content, which would activate and enhance pedestrian activity along the Project's frontages. These improvements, together with the location of the Project on an urban infill site within a TPA and in close proximity to transit,²¹ would facilitate a reduction of vehicle trips and VMT.

Lastly, the Project would be consistent with the General Plan land use designation (Regional Center Commercial) and zoning (C2-4D) of the Project Site, which allow the proposed FAR with approval of a TFAR. The Applicant is requesting approval of a TFAR greater than 50,000 square feet of floor area for the transfer of up to 470,674 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to be added to the Project Site with an existing 1,424,314 square feet, thereby permitting a total maximum of 1,894,988 square feet, or 10.15:1 FAR in lieu of the otherwise permitted existing nonconforming 7.63:1 FAR and the maximum 6:1 FAR permitted by the C2-4D Zone. This would further many of the goals, objectives, and policies of the Framework Element's Land Use Chapter, including but not limited to, a physically balanced distribution of land uses; providing for the patterns of uses established in the Central City Community Plan; to accommodate new development in accordance with the land use provisions of the General Plan Framework Element Long-Range Land Use Diagram and Zoning Ordinance; providing for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution; providing for the siting of new development that maintains the prevailing scale/character of the City's stable residential neighborhoods; accommodating projected population and employment growth in the City; and encouraging new multi-family residential development in the City's downtown centers.

Based on the above, the Project would support and not conflict with the applicable goals and objectives set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

²¹ *The Project Site contains a portal that provides access to the Metro 7th Street/Metro Center Station, which provides direct access to the Metro B (Red), D (Purple), A (Blue), and E (Expo) Lines and is considered a hub for the regional rail network. The Project Site is also well-served by a variety of public transit options provided by Metro, the Los Angeles Department of Transportation's (LADOT) Downtown Area Short Hop (DASH), LADOT's Commuter Express (CE), Antelope Valley Transportation Authority (AVTA), Santa Monica Big Blue Bus (BBB), Foothill Transit, Orange County Transportation Authority (OCTA), Montebello Bus Lines, and Torrance Transit.*

(b) Housing Chapter

The Project would support the City's goal to provide a distribution of housing opportunities by type and cost through the development of 466 new multi-family residential units, consisting of 83 studios, 203 one-bedroom units, 68 one-bedroom units with dens, 100 two-bedroom units, and 12 three-bedroom units. The Project would, therefore, also support and not conflict with the City's objective to plan the capacity for and develop incentives to encourage production of housing units of various types to meet the projected housing needs of the future population. The Project would encourage a range of new housing opportunities within Downtown Los Angeles in close proximity to existing jobs and transit (including the Metro 7th Street/Metro Center Station and multiple existing bus routes) by locating the proposed mix of multi-family housing types in a high activity area well-served by public transit, particularly since the Project Site is within a TPA and SCAG-designated HQTAs.²² Furthermore, the Project would contribute to the City's SCAG RHNA-identified share of regional housing goal by providing 466 new multi-family residential units in a range of sizes (i.e., studio and one- to three-bedroom units) and costs. Therefore, the Project would not conflict with the applicable goals and objectives set forth in the Framework Element's Housing Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) 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. Specifically, the Project would support the City's objective to 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 as the Project Site is located in the Downtown Center in an area well-served by transit and where activity is already concentrated. As previously discussed, the Project Site contains a portal that provides access to the Metro 7th Street/Metro Center Station, which provides direct access to the Metro B (Red), D (Purple), A (Blue), and E (Expo) Lines and is considered a hub for the regional rail network. The Project Site is also well-served by a variety of public transit options provided by Metro, LADOT DASH, LADOT CE, AVTA, Santa Monica BBB, Foothill Transit, OCTA, Montebello Bus Lines, and Torrance Transit. The Project would enhance the streetscape immediately adjacent to the Project by implementing a design that improves the pedestrian experience and enhances linkages to the Project's new residential uses, as well as to the Project Site's central plaza and existing retail, commercial, and hotel uses.

²² SCAG, *Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, High Quality Transit Areas (2045), Exhibit 3.8.*

Specifically, the Project would introduce a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building, which would serve to activate the streets and promote walkability. The Project would also include enhanced sidewalk paving, five replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street, thereby providing a more comfortable pedestrian environment. The Project also proposes a Sign District for signage that would include digital displays, non-digital signs, and digital kiosks, among others, and including both on-site and off-site content, which would create an exciting pedestrian experience along the Project's frontages. Further, the Project would incorporate elements that promote individual and community safety, such as security lighting, a dedicated security team for the new tower containing residential uses, and a closed-circuit security camera system. Lighting of building entries and walkways would also provide for pedestrian orientation and allow clear identification of secure routes between parking areas and points of entry into the buildings.

Based on the above, the Project would not conflict with the applicable objectives set forth in the Framework Element's Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Open Space and Conservation Chapter

The Project would promote the goals and objectives of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. Specifically, the Project would provide approximately 54,750 square feet of open space (which is more than required by the LAMC), of which 44,750 square feet would be exterior open space and 10,000 square feet would be interior open space. In addition, 13,600 square feet of the exterior common open space would be landscaped. The Project would provide exterior and interior common open space for amenities on Levels 12 and 51 of the proposed high-rise building. Specifically, on the podium roof level (Level 12), approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities, which may include a pool deck, lounge areas, and picnic areas with tables and seats, would be provided. Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level and may include multi-purpose space, lounge areas, co-working areas, and/or a fitness area. On the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided. Further, in accordance with the LAMC, the Project would provide a total of 117 trees. Therefore, the Project would not conflict with the applicable goals and objectives set forth in the Framework Element's Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(e) Economic Development Chapter

The Project would support the City's objective to ensure that the available range of housing opportunities is sufficient by providing different housing unit types at various costs through the development of 466 new multi-family residential units, consisting of 83 studios, 203 one-bedroom units, 68 one-bedroom units with dens, 100 two-bedroom units, and 12 three-bedroom units. The Project would also locate new housing on an urban infill site within a TPA in close proximity to jobs, shopping, services, and transit. Thus, the Project would not conflict with the applicable objectives and policies set forth in the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(f) 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 an erosion control plan (as part of the required SWPPP) for Project construction activities that would include best management practices and other erosion control measures to minimize the discharge of pollutants in stormwater runoff during Project construction. Construction activities would also occur in accordance with City grading permit regulations. As discussed in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, during operation, the Project would implement best management practices (BMPs) (i.e., stormwater capture and use) in compliance with the Low Impact Development (LID) Ordinance. Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Additionally, Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Treatment Plant. Further, 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. 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, the Project would provide the LAMC-required trash and recycling receptacles, and the LAMC-required space for these receptacles, in order to ensure safe and efficient handling of solid waste. Therefore, the Project would not conflict with the applicable goals, objectives and policies of the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Mobility Plan 2035

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

As detailed therein and Section IV.H, Transportation of this Draft EIR, 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 (CTMP), pursuant to Project Design Feature TR-PDF-1. The CTMP would incorporate safety measures around the construction site during the construction period 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 promoting walkability through the Project's design and pedestrian and streetscape improvements. Specifically, as discussed in Section II, Project Description of this Draft EIR, the Project would introduce a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building, which would serve to activate the streets and promote walkability. The Project would also include enhanced sidewalk paving, five replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street. Furthermore, the Project does not propose modifications to widen any streets.

The Project would recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes, as integral components of the City's transportation system by providing safe and accessible pedestrian, bicycle, and vehicular access and easy access to transit. Although the Project would support residents and visitors who choose to travel by automobile through the maintenance of existing vehicular access points along 8th Street, Flower Street, and Hope Street and the provision of adequate parking supply to serve demand, the Project would encourage transit usage by developing a high-density residential tower adjacent to jobs; services, including the existing on-site commercial uses; and transit, such as the Metro 7th Street/Metro Center Station. Furthermore, the Project would provide 214 bicycle parking stalls (22 short-term and 192 long-term spaces) to encourage non-motorized transportation. Twelve of the short-term and all the long-term bicycle parking spaces would be located indoors and 10 of the short-term bicycle parking spaces would be located outside on the public sidewalk. The Project would also implement transportation demand management (TDM) measures, including bicycle parking spaces per LAMC and a reduced vehicle parking supply, to reduce the number of single-occupancy vehicle trips. Overall, given the location of the Project Site along and in proximity to major transit corridors, as well as the incorporation of pedestrian and streetscape improvements and design features, the Project would serve to reduce per capita VMT within the Central Area Planning Commission (APC) area.

No new on-site driveways would be introduced. Pursuant to Project Design Feature TR-PDF-2, the Project would provide for the installation of signalized alert systems at all four existing driveways, thereby reducing future pedestrian and vehicle conflicts. Furthermore, the Project, (which includes a 190-foot length mid-block sidewalk replacement in front of the Project's proposed residential tower and excludes existing sidewalks on other portions of this block, would comply with the applicable LADOT standards and applicable requirements of the Americans with Disabilities Act (ADA) and would provide an accessible route connecting to existing pedestrian amenities at the east and west ends of the Project's new sidewalk.

As previously noted, the Project also proposes a Sign District for signage that would include digital displays, non-digital signs, and digital kiosks, among others, and including both on-site and off-site content. The proposed signage would orient tourists, visitors, employees and transit users. Signage along the exterior façades would draw pedestrian attention to The Bloc and its diverse uses, including the Metro 7th Street/Metro Center Station, encouraging pedestrian connection between The Bloc and adjacent uses on all four street frontages.

Therefore, as detailed in Table 3 in Appendix E of this Draft EIR, 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) Conservation Element

As identified in Subsection IV.E.2.a.(2)(a)(iv), the Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources. The Project's consistency with applicable objectives and policies are analyzed below.

As discussed in the Section II, Project Description, of this Draft EIR, the Project Site is located in an urbanized area and is entirely developed with hotel and commercial uses and associated parking, as well as a portal that provides access to the Metro 7th Street/Metro Center Station. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site does not include any forest land or timberland and is not zoned as forest land or timberland. The Project Site does not contain large expanses of open areas space or natural resources. There are no private property trees associated with the Project Site; however, there are 25 street trees in the public street right-of-way. None of the 25 street trees are considered to be protected by the City of Los Angeles

Protected Tree and Shrubs Ordinance.²³ As indicated in the Tree Inventory Report, five of the 25 street trees on Hope Street would be removed as part of the Project and replaced in compliance with applicable City requirements. All other street trees would be avoided or preserved in place. Additionally, 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 or surrounding the Project Site, which provide linkages to natural open spaces areas. Furthermore, no mineral extraction operations currently occur on the Project Site, and none are proposed by the Project.

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, none of the buildings on the Project Site are considered historic resources as defined by CEQA. There are 20 historic resources in the Project vicinity, including 19 individual properties and one historic district (not all of these are officially designated historical resources). However, the Project Site comprises an entire City block, and all of these resources are separated from the Project Site by at least one street and, in some cases, by intervening buildings. Although the Project would introduce increased height and density to the Project Site, the Project would not result in the demolition, destruction, relocation, or alteration of any potential historical resource or its immediate surroundings, such that the significance of a historical resource would be materially impaired. In addition, as discussed in Section IV.E, 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. Overall, the Project would support the Conservation Element's objective to protect important cultural and historical sites and resources.

As discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would also adhere to the City's standard conditions of approval for archaeological and paleontological resources to address any inadvertent discovery of archaeological and paleontological resources. Therefore, with implementation of the City's established conditions of approval, the Project would support the Conservation Element's objective to protect the City's archaeological and paleontological resources. Furthermore,

²³ Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

as analyzed in the Initial Study, included in Appendix A of this Draft EIR, the Project would not have a substantial adverse effect on any publicly available scenic vista.

During construction the Project would be required to implement a Local SWPPP that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, the implementation of BMPs required by the City's LID Ordinance during project operation would target pollutants that could potentially be carried in stormwater runoff.

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.

(4) Housing Element

The Project's consistency with the applicable objectives and policies set forth in the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 4 of Appendix E of this Draft EIR. As discussed therein, the Project would expand opportunities for residential development by providing a variety of housing types (i.e., studio, one-, two-, and three-bedroom units). Specifically, the Project would provide 466 new multi-family residential units, consisting of 83 studios, 203 one-bedroom units, 68 one-bedroom units with dens, 100 two-bedroom units, and 12 three-bedroom units. As such, the Project would contribute toward the City's meeting its SCAG RHNA-identified share of regional housing demand.

The high-density multi-family residential uses would be integrated within the existing mixed-use development and parking facility, resulting in a synergistic environment, where people can live, work, and play. Specifically, the Project would be developed on an infill site within a highly urbanized area in close proximity to jobs, services, shopping, amenities and transit and include open space and recreational amenities to promote a more active lifestyle and improve the quality of life of the Project's residents. As previously discussed, the Project would introduce a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, along the Hope Street frontage of the existing podium building, which would serve to activate the streets. The Project would also include enhanced sidewalk paving, five replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street. Furthermore, the Project's close proximity to nearby retail, restaurants, and jobs, and multiple pedestrian connections to the surrounding streets would promote pedestrian accessibility to these uses. Overall, the Project would include sufficient services and amenities to support the existing and planned

population and would create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.

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

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

The Project would be consistent with the applicable goals and objectives of the Health and Wellness Element by expanding housing opportunities, avoiding displacement of existing housing or populations, promoting healthy living, and integrating healthy building design and construction on a site in close proximity to public transit. As previously discussed, the Project includes 83 studio units, 203 one-bedroom units, 68 one-bedroom and den units, 100 two-bedroom units, and 12 three-bedroom units, thereby expanding housing opportunities. The Project would not result in the displacement of existing housing or populations as the Project Site is currently developed with hotel and commercial uses and associated parking, as well as a portal that provides access to the Metro 7th Street/Metro Center Station. The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. “Green” principles are incorporated within new construction in the Development Area to comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council’s LEED® program to meet the standards of LEED Silver® or equivalent green building standards. These standards would reduce and conserve energy, water usage, and waste, thereby reducing associated GHG emissions and the impact on natural resources and infrastructure. Furthermore, the Project would incorporate open space areas and promote pedestrian activity, walkability, and biking and contribute to the creation of a healthy community. Lastly, the Project would be developed on an urban infill site within a City-designated TPA and SCAG-designated HQTAs in close proximity to transit and would implement TDM measures, which together would reduce Project vehicle trips per capita VMT within the Central APC area, fuel use, and GHG emissions. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

(6) Central City Community Plan

The Project’s general consistency with the objectives and policies set forth in the Central City Community Plan and adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 5 of Appendix E of this Draft EIR.

The Project would increase the range of housing choices available to Downtown employees and residents and foster development that can accommodate a full range of

incomes, by providing residential units that range in unit types and sizes. Specifically, the Project would include the development of 466 new multi-family residential units, consisting of 83 studios, 203 one-bedroom units, 68 one-bedroom units with dens, 100 two-bedroom units, and 12 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. The Project would encourage pedestrian activity by introducing a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building. The Project would feature high-quality finish materials on the ground-level façade and storefronts, which would create interest at the pedestrian scale, and would improve the pedestrian environment along Hope Street by providing enhanced sidewalk paving along a 190-foot portion of Hope Street, as well as five replacement street trees. As such, the Project would provide opportunities to improve Downtown's pedestrian environment and circulation and reduce parking demand and per capita VMT within the Central APC area by encouraging the use of alternative modes of transportation available in the immediate vicinity of the Project Site.

The Project would also incorporate elements that would promote individual and community safety, including, but not be limited to, a dedicated security team for the residential tower, a closed-circuit security camera system, proper lighting of building entries and walkways to provide for pedestrian orientation, sufficient lighting of parking areas to maximize visibility and reduce areas of concealment; entrances to and exits from the building, open spaces around the building, and pedestrian walkways designed to be open and in view of surrounding sites.

The Project would take advantage of the Project Site's easy access to the freeway system, major boulevards connecting Downtown Los Angeles to the region and mass transit, as the Project increases density on an urban infill site in the Downtown Center within a City-designated TPA and SCAG-designated HQTAs that is well-served by freeways (including SR-110), major arterials, and mass transit, including the Metro 7th Street/Metro Center Station and multiple bus lines. Lastly, the Project is consistent with the General Plan land use designation and zoning of the Project Site. Specifically, the Project would be consistent with the Central City Community Plan's General Plan Land Use Map, which designates the Project Site as Regional Center Commercial, and with the C2-4D zoning of the Project Site, which permits high-rise residential and/or commercial development and allows the proposed FAR with approval of a TFAR.²⁴ Accordingly, the Project would intensify urban development in an area planned for such intensification and would take

²⁴ *City of Los Angeles, Central City Community Plan, General Plan Land Use Map, July 7, 2009.*

advantage of the Project Site's easy access to mass transit facilities, the freeway system, and major boulevards that connect Downtown Los Angeles to other parts of the region.

Based on the above and as presented in Table 5 in Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies of the Central City Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(ii) Downtown Community Plan (DTLA 2040 Plan)

The DTLA 2040 Plan is the proposed update to the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles and include policies, plans, and programs that frame the City's long-term priorities. The Project Site is located within the DTLA 2040 Plan's designated "Transit Core."²⁵ Transit Core areas are dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form ranges from Moderate Scale to High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock.²⁶ As discussed in Section II, Project Description, of this Draft EIR, the Project would develop 466 residential units and associated amenities within a new high-rise tower located on The Bloc, a mixed-use development that is currently occupied with hotel, commercial, retail, and restaurant uses and a portal that provides access to the Metro 7th Street/Metro Center Station. Further, as previously discussed, the Project Site is located within a City-designated TPA and SCAG-designated HQTAs and is designated by the Central City Community Plan General Plan Land Use Map as Regional Center Commercial.²⁷ As such, it is reasonably anticipated that the Project would be generally consistent with the DTLA 2040 Plan's Transit Core designation.

(iii) Los Angeles Municipal Code

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

As previously discussed, the Project Site is zoned C2-4D (Commercial zone, Height District 4 with Development Limitations). As discussed in Section II, Project Description, of this Draft EIR, the Project would include the development of a new 53-story residential tower. Upon completion of the Project, the Project Site would include 1,894,988 square

²⁵ City of Los Angeles, DTLA 2040, Draft General Plan Land Use Designation Map.

²⁶ City of Los Angeles, DTLA 2040 Draft EIR, p. 4.10-22.

²⁷ City of Los Angeles, Central City Community Plan, General Plan Land Use Map, July 7, 2009.

feet of floor area with a building height of 710 feet above grade and an FAR of 10.15:1. As described in Section II, Project Description, of this Draft EIR, pursuant to LAMC Section 14.5.6 A, the Applicant is requesting a TFAR greater than 50,000 square feet of floor area for the transfer of up to 470,674 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to be added to the Project Site (Receiver Site) with an existing 1,424,314 square feet, thereby permitting a total maximum of 1,894,988 square feet, or 10.15:1 FAR in lieu of the otherwise permitted existing nonconforming 7.63:1 FAR and the maximum 6:1 FAR permitted by the C2-4D Zone. The Project would be consistent with the applicable LAMC land use, building height, and (with approval of a TFAR) FAR restrictions for the Project Site.

(2) Open Space and Landscaping

LAMC Section 12.21 G requires open space for new developments with six or more dwelling units pursuant to LAMC Section 12.22 C.3(d). The Greater Downtown Housing Incentive Area (which the Project Site is located within) permits any percentage of the required open space to be provided as either private or common open space. Per LAMC Section 12.21 G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms, 125 square feet of open space provided for each residential unit containing three habitable rooms, and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. The LAMC also includes a maximum permitted interior open space restriction of 25 percent and a requirement that landscaping must comprise 25 percent of the exterior common open space. Based on these provisions, as shown in Table II-3 in Section II, Project Description, of this Draft EIR, the Project would be required to provide at least 51,700 square feet of open space, of which a minimum of 11,188 would need to be landscaped. As indicated in Table II-2, the Project would provide approximately 54,750 square feet of open space, of which 44,750 square feet would be exterior open space. In addition, 13,600 square feet of the total exterior common open space would be landscaped. Thus, the Project would exceed the applicable open space requirements set forth by the LAMC and, as such, would be consistent with the LAMC as related to open space and landscaping.

(3) Parking

(a) Vehicle Parking

As shown in Table II-4 in Section II, Project Description, of this Draft EIR, with respect to residential parking, LAMC Section 12.21 A.4(p)(1) provides for a parking requirement of one space per unit with three habitable rooms or less, or 1.25 spaces per unit with more than three habitable rooms, which would result in a total of 511 parking spaces if applied to the Project's proposed 466 units. As also shown in Table II-4 in Section II, Project Description, of this Draft EIR, the LAMC also provides for a parking requirement of 1,385 for the existing hotel and commercial uses to remain. In addition,

251 spaces are required by existing parking covenants AFF 81-31644 and AFF 89-94331. However, the Applicant proposes to provide a reduced parking supply as compared to the requirements of the LAMC and proposes to provide a total of 1,948 automobile parking spaces for all proposed uses, including both new uses and existing uses to remain. This total accounts for the removal of 464 existing parking spaces as part of the seismic retrofitting of the existing podium building and includes the 251 covenanted spaces required by existing parking covenants.

The Applicant's request for reduced parking supply of 1,948 automobile parking spaces relies on AB 2097, signed by Governor Newsom on September 22, 2022, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential or commercial development project that is within one-half mile of a Major Transit Stop. Therefore, pursuant to AB 2097, the Project's proposed reduced parking would be consistent with the applicable vehicle parking provisions of the LAMC.

Pursuant to LAMC Section 12.21 A,16, the Project is required to provide a total of 212 bicycle parking spaces for the proposed residential uses, including 20 short-term and 192 long-term spaces. The Project would provide a total of 214 bicycle parking spaces, including 22 short-term and 192 long-term spaces. Twelve of the short-term bicycle parking spaces would be located indoors, and 10 of the short-term bicycle parking spaces would be located outdoors on the public sidewalk. The long-term bicycle parking stalls and bicycle storage would be located on Level A with direct access through the residential lobby elevator. Therefore, the Project would be consistent with applicable bicycle parking provisions of the LAMC.

(4) Lighting

The Project would introduce new light sources within the Project Site, including interior building lighting, exterior security lighting, exterior architectural lighting, and sign lighting. Project lighting for the residential use would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the site. Outdoor lighting sources would be shielded away from adjacent properties to minimize impacts. Furthermore, the Project would include digital displays, non-digital signage and digital kiosks, among others, as proposed by the Sign District.

LAMC Section 14.4.4 E requires that no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than 3.0 foot-candles (fc) above ambient lighting, as measured at the property line of the nearest residentially zoned

property. As discussed in the Lighting Study, included as Appendix F of this Draft EIR, the light trespass illuminance from the proposed signs would not exceed the LAMC threshold of 3.0 fc, and would therefore not create an impact at the monitoring sites evaluated or at residential use properties adjacent to the Project Site.²⁸ Therefore, the Project would be consistent with the applicable lighting provisions of the LAMC.

(5) Trees

LAMC Section 12.21 G requires the planting of one 24-inch box tree per every four new dwelling units. Based on the 446 dwelling units proposed by the Project, 117 trees would be required, which would be provided by the Project. In addition, to accommodate Project tower construction, five street trees along Hope Street would be removed, which would be subject to the Board of Public Works approval. Five replacement street trees in landscape tree wells are proposed within a 190-foot portion of Hope Street.

(iv) Citywide Design Guidelines

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

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

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, to improve the streetscape, the Project would provide enhanced sidewalk paving, five replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street, thereby providing a more comfortable pedestrian experience. In addition, the Project would introduce a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building, which would serve to activate the streets. Project lighting for the residential use would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting to accent signage would be featured on the Project Site and architectural features and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the Project Site. In addition, as provided in

²⁸ Francis Krahe & Associates, *The Bloc Sign Supplemental Use District Lighting Study*, Los Angeles, California, April 11, 2023. See Appendix F of this Draft EIR.

Section IV.G.2, Public Services—Police Protection, of this Draft EIR, the Project would implement several design features to enhance safety within and immediately surrounding the Project Site including, but not limited to, a closed-circuit camera system; a dedicated security team for the residential tower; sufficient lighting of buildings, walkways, parking areas, elevators, and the residential lobby; and entrances to and exits from the new tower, open spaces around new tower, and the relocated pedestrian walkway along Hope Street will be designed to be open and visible from surrounding sites. Further, no new on-site driveways will be introduced and two driveways along 7th Street and Hope Street, near 8th Street, would incorporate pedestrian warning systems. Therefore, the Project would not conflict with Citywide Design Guideline 1.

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

The primary vehicular access to the Project Site would continue to be provided from existing vehicular ingress/egress driveways at the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. An existing porte-cochere is located mid-block along Hope Street, servicing the hotel use for pick-up and drop-off and valet parking purposes. Further, all vehicular access to the Project Site would continue to be separate from the pedestrian and bicycle access points. No new on-site driveways would be introduced, and all new pedestrian entrances would be designed in accordance with LADOT standards and ADA requirements. Therefore, the Project would not conflict with Citywide Design Guideline 2.

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

The Project would improve the streetscape by providing enhanced sidewalk paving, five replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street. In addition, the Project would introduce a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building, which would serve to activate the streets. The Project would retain the other existing pedestrian passageways, one on Hope Street and the other two along Flower Street. The four pedestrian passageways and the main pedestrian entry to The Bloc along 7th Street provide connections to the variety of uses within The Bloc, access to other streets, and access to the Bloc's onsite portal to the Metro 7th/Metro Center Station. The main pedestrian entry to the Project Site, along 7th Street, is an open air entry court that leads to a below grade open-air plaza that is the central element of the Existing Development and contains access to most of the retail, restaurant and fitness uses. The main pedestrian entry on 7th Street also provides pedestrian access to the office tower, medical office, Alamo Drafthouse, and other uses through walkways on either side of the opening to the below grade open-air plaza. Overall, the Project would be

designed to actively engage with streets and public space and maintain human scale. Therefore, the Project would not conflict with Citywide Design Guideline 3.

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

The area surrounding the Project Site is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (retail and restaurant), multi-family residential, institutional, and parking uses. Properties immediately adjacent to the Project Site are zoned C2-4D with a Regional Center Commercial land use designation. Properties to the north of the Project Site along 7th Street are developed with the mid-rise Roosevelt Lofts and 655 Hope Condos adaptive reuse buildings. These multi-story, mixed-use buildings contain ground floor commercial uses that include various dining establishments. Properties to the south of the Project Site along West 8th Street are improved with two multi-story mixed-use buildings with ground floor commercial uses (8th+Hope Apartments and the Gas Company Lofts). Properties to the east of the Project Site along South Hope Street are improved with mid-rise commercial and retail building, a small religious structure (the Third Church of Christ, Scientist of Los Angeles), and parking facilities. Properties to the west of the Project Site along Flower Street are improved with two multi-story parking garages, a surface parking lot, and a multi-story office building with ground floor commercial uses that include dining establishments. In addition, construction of a 41-story mixed-use building is underway at the intersection of Figueroa Street and 8th Street. In the Project vicinity, beyond these land uses are numerous high-rise commercial and residential buildings that form the Downtown skyline. The Project would be designed to be compatible with the general urban characteristics of the surrounding neighborhood. The new tower, with a height of 710 feet, would be designed as a slender point tower, addressing its relationship to surrounding towers and its access to views in all directions. The façade of the tower would be designed to maximize access to light and air through the use of perimeter balconies and floor to ceiling glass, which would promote inside/outside residential living. The top of the tower would be capped off with a spiraling rose bud geometry, creating a distinct and unique rooftop within the Downtown skyline. Proposed materials, primarily glass and smooth white metal panels, would emphasize the curvature and flowing lines of the tower. The proposed tower would also be setback from the adjacent streets, thereby reducing its visual impact on the pedestrians, bicyclists, and vehicular traffic using these streets and the adjacent uses. Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The new tower would be designed to complement adjacent structures. While the tower would be a separate building with a total of 53 stories, the first 12 stories would be enclosed within the existing retail/parking podium building, which would be increased from nine to 12 stories, and, thus, the new tower and podium building would appear to be an

integrated building, consisting of a 41-story tower that extends above the 12-story podium. Strong horizontal design elements would be incorporated in both the new tower and the existing podium building, which would provide continuity and tie the slender point tower and the rectangular podium building together as one cohesive building. The new tower's alternating horizontal bands of white metal and clear neutral glass would relate to the podium building's horizontal bands comprised of perforated screen enclosing the two new parking levels at the top of the podium; a masonry podium façade, with rectangular punched openings organized in a regular grid pattern at the podium's middle portion; large format masonry tile cladding, with a running bond pattern below the mid-point of the podium as measured from adjacent grade; and the recessed masonry on the ground level, which include storefronts. The new tower's white metal and clear neutral glass would express horizontal banding in a manner that contrasts with the rectangular masonry podium building that serves as a solid base to the slender point tower. At the new entry along Hope Street, the dark granite would tie into the colors of both the existing hotel and office towers on-site, while the bronze accents both at the entry and tower mullions relate back to the newer metal work recently installed at the Sheraton Hotel's porte cochère. The tower materials and color, white metal, and clear neutral glass would intentionally contrast with the other two towers within the block but tie back to the recently refurbished storefront elements found at street level, including the storefront frames and metal panels of Uniqlo, LA Fitness, and the post office at Flower and 7th streets. The terracotta soffit finishes of the tower would act as an accent material to give warmth to the new tower, which contrasts with the otherwise dark and monochromatic palette of the existing hotel and office towers within The Bloc development. The Project also proposes a Sign District for signage that would include digital displays, non-digital signs, and digital kiosks, among others, and including both on-site and off-site content, which would be architecturally integrated with the existing and future development, and would help establish Project identity and placemaking, create visual interest, and orient and direct visitors to the diverse uses at The Bloc. All of these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea. Therefore, the Project would not conflict with Citywide Design Guideline 5.

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

As previously discussed, the Project would provide enhanced sidewalk paving, five replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street, thereby providing a more comfortable pedestrian experience (see Figure II-7 in Section II, Project Description, of this Draft EIR). The Project would also provide approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities, such as a pool deck, lounge areas, and picnic areas with tables and seats, with associated landscaping on the podium level (Level 12, see Figure II-8 in Section II, Project Description, of this Draft EIR). Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided and would

include amenities, such as a multi-purpose space, lounge areas, co-working areas, and a fitness area. On the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of amenities, such as lounge, picnic areas and associated landscaping, and 2,000 square feet of interior multi-purpose space would be provided (see Figure II-9 in Section II, Project Description, of this Draft EIR). The residential tower amenities would create inviting recreation spaces for residents and their guests, with the outdoor landscaped (i.e., green) areas on the ground floor and Levels 12 and 51. In addition, as discussed in Section II, Project Description, of this Draft EIR, Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the Project Site. Thus, the Project would not conflict with Citywide Design Guideline 6.

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

All existing driveways near the corners of 8th, Flower, and Hope Streets would remain unchanged, and Project vehicular, pedestrian, and bicycle traffic would be separated for safety. The Project would also include lighting along the building and pathways to provide for pedestrian orientation. The Project would provide for the installation of signalized alert systems at all four existing driveways, thereby providing added safety for pedestrians and bicyclist. Therefore, the Project would not conflict with Citywide Design Guideline 7.

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

The Project Site is located in an urbanized area and is currently occupied by The Bloc, a mixed-use complex that includes hotel and commercial uses and associated parking, as well as a portal that provides access to the Metro 7th Street/Metro Center Station. No existing natural habitat, waterways, or other natural areas exist on-site. Existing landscaping adjacent to the Project Site includes 25 street trees. The Project would remove five street trees along Hope Street, none of which are considered protected species by the City. Five new replacement street trees in landscape tree wells are proposed within a 190-foot portion of Hope Street. Thus, the Project would not conflict with Citywide Design Guideline 8.

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 tower façade would maximize access to light and air by providing private balconies and floor to ceiling windows, which would promote inside/outside living. These balconies also serve as self-shading structures to reduce solar heat gain at the building interior. For the proposed north facing

units, balcony depths would be reduced to maximize access to daylight and views. Additionally, the Project would provide trees and other landscaping on the ground floor and Levels 12 and 51 that would provide both solar shading and increase the visual appearance and comfort and well-being of users. Therefore, the Project would support this goal of reducing energy demand. Overall, the Project would not conflict with Citywide Design Guideline 9.

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

The Project Site is already fully developed with urban uses (i.e., hardscape), and, as such, there is no existing natural habitat on the Project Site. As discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would be required to comply with the City's LID ordinance. As part of the LID requirements, the Project would manage stormwater through a capture and reuse system. The Project would install a new storage tank with a submersible pump that would be designed to store stormwater runoff for use as drip irrigation for the planter areas on the lower and upper levels of the new tower building. In the event that the proposed system becomes overwhelmed by a storm event, the collected runoff would be directed to an approved discharge point in the public right-of-way. Therefore, the Project would not conflict with Citywide Design Guideline 10.

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

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

As discussed in Table 6 in Appendix E of this Draft EIR, the Project would not conflict with the applicable standards and guidelines of the DDG. Specifically, the Project would promote a more livable and sustainable Downtown by providing a cohesive design and relationship between the neighborhood, street, and proposed development. The Project location would provide residents and visitors with accessible transportation choices, including the Metro 7th Street/Metro Center Station, a hub of the regional rail network, and numerous bus lines in the vicinity. The Project would prioritize pedestrians by providing streetscape improvements associated with the new tower tailored to encourage pedestrian activity, such as enhanced sidewalk paving, five new replacement street trees in landscape tree wells, and short-term bicycle parking within a 190-foot portion of Hope Street, a new residential entrance, as well as a new storefront for the relocated retail space and the

relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building. The new retail storefront entry and the relocated pedestrian passageway would be improved with lighting and signage to clearly mark the uses, distinguish them from the residential lobby entrance, and invite pedestrian access. The Project would feature high-quality finish materials on the ground-level façade and storefronts, which would create interest at the pedestrian scale. The Project also proposes a Sign District for signage that would include digital displays, non-digital signs, and digital kiosks, among others, and including both on-site and off-site content, which would enhance the overall Project design and create a sense of place with a lively and exciting pedestrian experience along the Project's frontages. Lastly, the Project would comply with the Los Angeles Green Building Code and LEED Silver or equivalent building standards to implement energy conservation, water conservation, and waste reduction features.

The existing exterior building walls and columns are built up to the property line, thereby providing zero setbacks along all four street frontages consistent with the setbacks appropriate within the Regional Center Commercial land use district. Since the Project Site is currently built out to the property lines and the Project would not change the current location of the existing exterior walls or columns, the 5-foot sidewalk easement on 8th Street and the 3-foot sidewalk easement on Hope Street required by the Downtown Street Standards cannot be provided due to the existing buildings to remain. Pursuant to LAMC Sections 17.03 and 17.15, the Applicant seeks to deviate from the provisions of the Downtown Street Standards referenced in the Mobility Plan and waive all additional street dedications and sidewalk easements.

The design of the two new parking levels would be integrated seamlessly into the design of the existing parking/retail podium, which would complement the new tower design and minimize the visibility of parking. There would be no change to the parking access from the street level, and no new drop-off zones are proposed as part of the Project. Additionally, the existing hotel port-cochere along Hope Street would remain unchanged. Furthermore, the Project would encourage the use of alternate modes of transportation through the provision of 214 bicycle parking stalls (22 short-term and 192 long-term spaces) on-site.

The new tower would be consistent with the tower spacing guideline as it is farther than 80 feet from the closest existing tower. Further, all residential units would have access to natural light and air. As discussed in Section II, Project Description, of this Draft EIR, the tower façade would maximize access to light and air by providing private balconies and floor to ceiling windows, which would promote inside/outside living. For the proposed north facing units, balcony depths would be reduced to maximize access to daylight and views.

As previously discussed, the Project would provide approximately 54,750 square feet of open space, of which of which 44,750 square feet would be exterior open space. In addition, 13,600 square feet of the total exterior common open space would be landscaped as required by the LAMC. Specifically, the Project would provide approximately 41,250 square feet of residential exterior open space on the podium roof level (Level 12), consisting of a variety of amenities, such as a pool deck, lounge areas, and picnic areas with tables and seats. Additionally, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level consisting of multi-purpose space, lounge areas, co-working areas, and a fitness area. On the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space, consisting of lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided. The Project would also provide five replacement street trees in landscape tree wells within a 190-foot portion of Hope Street. As such, the Project would incorporate amenities and landscaping that serve residents, encourage outdoor activities, and provide pedestrian comfort along streets.

The Project would introduce new light sources within the Project Site, including interior building lighting, exterior security lighting, exterior architectural lighting, and sign lighting. Project lighting for the residential use would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting for accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the Project Site. Outdoor lighting sources would be shielded away from adjacent properties to minimize impacts. Hence, the Project would provide well-designed architectural and landscape lighting integrated into the proposed Project to create a sense of safety, encourage pedestrian activity after dark, and support Downtown Los Angeles' vital nightlife.

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes a Sign District pursuant to existing Case No. CPC-2018-6388-SN, filed on October 31, 2018 that would encompass the entire City block and provide coordinated and creative signage for The Bloc. The Sign District would establish clear standards to ensure cohesion and compatibility with the surrounding land uses, facilitate unique signage that would support and enhance the overall Project design, and create a sense of place with a lively and exciting pedestrian experience along the four street frontages. With the approval of the requested Sign District, the Project would not conflict with LAMC or DDG standards and guidelines related to signage.

In summary, with approval of the requested discretionary actions, the Project would be consistent with all applicable standards and guidelines of the DDG adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Conclusion

Based on the analysis provided above, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with land use plans would be less than significant.

(2) Mitigation Measures

Project-level impacts 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 or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, a total of 44 related projects have been identified in the vicinity of the Project Site. The related projects comprise a variety of uses, including residential, commercial, hotel, and office uses, as well as mixed-use developments incorporating some or all of these elements. The closest related project to the Project Site is Related Project No. 1, located at 744 South Figueroa Street, across from the Project Site along Figueroa Street.

As with the Project, the related projects would be required to comply with relevant land use plans, policies and regulations. Therefore, as with the Project, the related projects would not conflict with applicable land use plans, policies, and regulations. Specifically, as with the Project, the related projects would be required to comply with relevant land use policies and regulations. Specifically, as with the Project, the 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 Los Angeles 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. **As such, overall cumulative impacts related to conflicts with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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