IV. Environmental Impact Analysis
H. Land Use and Planning

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts with regard to conflicts with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impact related to the potential physical division of an established community was fully evaluated in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Local

Several plans, policies, and regulatory documents guide development within the City of Los Angeles (City). The Project Site is located within the boundaries of Central City North Community Plan (Community Plan), which constitutes the local land use policy standards of the City of Los Angeles General Plan (General Plan) for the Central City North Community Plan area. The Los Angeles Municipal Code (LAMC) governs land use through specific development and design standards and building and safety codes. Applicable plans and associated regulatory documents/requirements are described below.

(a) City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a general plan, which is a comprehensive long-term document that provides principles, policies, and objectives to guide future development.

The City's General Plan is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development. The General Plan sets forth goals, objectives, and programs to guide land use policies and to meet the existing and future needs of the community. The General Plan consists of a series of documents which includes the seven state-mandated elements: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources,

Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the City of Los Angeles General Plan Framework Element (Framework Element). The Land Use Element is composed of 35 area plans known as community plans that guide land use at the community level. The Project Site is located within the boundaries of the Central City North Community Plan area.

(i) Los Angeles General Plan Framework Element

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

(1) Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are broadly described by ranges of intensity/density, heights, and lists of typical uses. These land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed Use Boulevards, and Industrial Districts. They are intended to serve as a guideline for the community plans and do not convey land use entitlements or affect existing zoning for properties in the City.[1] The Project Site is not identified as being located within any of these categories.

(2) Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element is to define the distribution of housing opportunities by type and cost for all residents of the City. The

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

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

(4) Open Space and Conservation Chapter

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

(5) Economic Development Chapter

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

(6) Transportation Chapter/Mobility Plan 2035

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. As discussed in the Transportation Chapter of the Framework Element, the goals, objectives, policies, and related implementation programs are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. The City Council initially adopted Mobility Plan 2035 in August 2015 as an update to the Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January 2016 and again in September 2016.[2] Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035.

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, the Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:[3]

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

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

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

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

(7) Infrastructure and Public Services Chapter

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

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project Site for the Mixed Use Development Scenario is included in Table 1 of Appendix J.1 of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project Site for the No-Hotel Development Scenario is included in Table 1 of Appendix J.2 of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

(ii) Los Angeles General Plan Housing Element

Adopted in December 2013, the Housing Element 2013–2021 of the City's General Plan identifies four primary goals and associated objectives, policies and programs. The goals are as follows:

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

- A City committed to ending and preventing homelessness.

The Project's consistency with the applicable objectives and policies set forth in the Housing Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the objectives and policies of the Housing Element applicable to the Project Site for the Mixed Use Development Scenario is included in Table 2 of Appendix J.1 of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular objective or policy. A detailed list of the objectives and policies of the Housing Element applicable to the Project Site for the No-Hotel Development Scenario is included in Table 2 of Appendix J.2 of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular objective or policy.

(iii) Los Angeles General Plan Conservation Element

The Conservation Element incorporates natural open space, agricultural, and other open space features of the State's general plan requirements and references other City plans that address mandated subjects, including water supply and demand, which is addressed by City water plans and the Infrastructure Systems Element. The Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the City's General Plan 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.[4]

The Project's consistency with applicable objectives and policies set forth in the Conservation Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below.

(b) Central City North Community Plan

The Central City North Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the General Plan Framework Element. Last updated in 2000, the Community Plan was developed in the context of promoting a vision for the Community Plan area as a community that preserves and enhances the positive characteristics of existing residential neighborhoods while

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

providing a variety of housing opportunities with compatible new housing; improves the function, design, and economic vitality of the commercial corridors; preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximizes the development opportunities of future transit systems while minimizing any adverse impacts; and plans the remaining commercial and industrial development opportunity sites for needed job-producing uses that will improve the economic and physical condition of the Community Plan area. The City is currently in the process of updating the Community Plan.

The Community Plan's land use designation for the Project Site is General Commercial. The Project's consistency with applicable goals, objectives, and policies in the Community Plan adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below. A detailed list of the goals, objectives and policies of the Community Plan applicable to the Project Site under the Mixed Use Development Scenario is included in Table 3 of Appendix J.1 of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy. A detailed list of the goals, objectives and policies of the Community Plan applicable to the Project Site under the No-Hotel Development Scenario is included in Table 3 of Appendix J.2 of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

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 DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.[5] Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:[6]

- Accommodate anticipated growth through 2040 in an inclusive, equitable, sustainable, and healthy manner while supporting and sustaining Downtown's ongoing revitalization

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[5] *City of Los Angeles, DTLA 2040, About, https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update, accessed November 4, 2020.*

[6] *City of Los Angeles, DTLA 2040, About, https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update*http://www.dtla2040.org/about.html*, accessed November 4, 2020.*

- Reinforce Downtown's jobs orientation
- Grow and support the residential base
- Strengthen neighborhood character
- Promote a transit, bicycle, and pedestrian friendly environment
- Create linkages between districts
- Create a World-Class Streets and Public Realm

As currently proposed by the Draft DTLA 2040 Plan, the Project Site will be designated as part of the Community Center, which will allow a maximum floor-area ratio (FAR) of between 6:1 and 8.5:1, with general uses that include mixed use neighborhood, multi-family residential, commercial (community retail and services), office, and hotel uses.[7] The DTLA 2040 Plan proposes the following description of the Community Center area:[8]

> *Community Center areas are complete urban neighborhoods & vibrant centers of activity. Often located around secondary transit nodes, these areas have a regular street grid and active alleys. Low and Mid-rise buildings have strong street walls and active ground floors reinforcing the urban character of these areas. Key pathways between regional transit resources and adjacent activity centers enhance the pedestrian experience and provide clear wayfinding between adjacent places. Residential, office, and community commercial uses are integrated to create balanced centers of activity. High-quality streetscapes and public spaces provide amenities to workers, residents, and visitors and promote a pedestrian-friendly environment.*

The DTLA 2040 Plan will inform developers of allowable development options, densities, and intensities and bring the Central City North Community Plan up to date as an improved planning tool.[9] The DTLA 2040 Plan process began in 2014, and a public scoping meeting was held in February 2017 to collect comments from agencies and the

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[7] *City of Los Angeles, DTLA 2040, August 2020 Draft, accessed November 4, 2020.*

[8] *City of Los Angeles, DTLA 2040, August 2020 Draft, accessed November 4, 2020.*

[9] *City of Los Angeles, Overview of the Draft Downtown Community Plan, What is a Community Plan?, https://ladcp.maps.arcgis.com/apps/Cascade/index.html?appid=75aef784670f484ba62acf77feb5ece3, accessed November 4, 2020.*

public. A Draft EIR regarding the DTLA 2040 Plan was released in August 2020 and will be followed by a public comment period and hearing.[10]

(c) Los Angeles Municipal Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The Project Site is designated by the LAMC as C2-2D (Commercial zone, Height District 2 with Development Limitation[11]). The zoning of the Project Site does not limit building height, but rather limits the floor-area ratio (FAR) to 3:1 (Footnote 4 in General Plan Land Use Map and the site specific D Limitation established in Ordinance 174,327) and a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. In addition, no front yard setbacks are required for commercial or residential uses. The Project Site is also located within a Transit Priority Area, as defined by Zoning Information (ZI) File No. 2452.[12] Additionally, the Project Site is within an area subject to ZI File No. 2427, which addresses the siting of sensitive land uses within 1,000 feet of freeways.[13]

(d) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by 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 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 are intended to "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill

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[10] *City of Los Angeles, Downtown Community Plan, Overview of the Draft Downtown Community Plan, https://ladcp.maps.arcgis.com/apps/Cascade/index.html?appid=75aef784670f484ba62acf77feb5ece3, accessed November 4, 2020.*

[11] *Ordinance No. 174327, approved by City Council on November 2, 2001, signed by the Mayor on November 15, 2001, effective January 5, 2002.*

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

[13] *ZI 2427, Freeway Adjacent Advisory Notice for Sensitive Uses, addresses air pollution caused by freeway proximity.*

development solutions" and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design.

(e) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. City of Los Angeles Department of City Planning staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and all community members to create enhanced pedestrian movement, and access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.[14]

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

As with the design principles included in the Urban Form and Neighborhood Design Chapter of the Framework Element, the guidelines provided in the Walkability Checklist are not appropriate for every project. The primary goal is to consider the applicable guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm. The Project's consistency with applicable design guidelines in the Walkability Checklist adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below.

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

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

The City has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), Los Angeles Fire Department Strategic Plan, Los Angeles Department of Water and Power 2015 Urban Water Management Plan, LA's Green New Deal,[15] and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR.

(g) Zoning Information File No. 2427

On November 8, 2012, the City Planning Commission issued an advisory notice, Zoning Information (ZI) File No. 2427, regarding siting sensitive land uses near freeways. Specifically, ZI File No. 2427 states that recent studies have established strong links to negative health outcomes affecting sensitive populations as far out as 1,000 feet from freeways. Although ZI File No. 2427 is informational in nature and does not impose any additional land use or zoning regulations, it is intended to inform project applicants of the significance of this issue. In addition, the City adopted Ordinance No. 184,245 in 2016, which, among other things, requires the provision of air filtration media for regularly occupied areas of buildings located within 1,000 feet of a freeway that achieves a Minimum Efficiency Reporting Value (MERV) of 13.

ZI File No. 2427 was updated in September 2018 and includes the following recommendations:

1. Avoid locating the following sensitive uses within the project: schools, day care facilities, and senior care centers.

2. Locate occupied open space areas (play areas, courtyards, patios, balconies, etc.) as far from the freeway sources as possible when the size of the site permits.

3. Prioritize the location of non-habitable uses, such as parking structures and building areas not calculated in floor area, nearest the freeway.

4. Screen the project site with substantial vegetation and/or a wall barrier.

[15] *Four-year update to the 2015 Sustainable City pLAn, released in 2019, which expands upon the City's vision for a sustainable future and provided accelerated targets and new goals.*

(2) Regional

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016–2040 RTP/SCS) and the Los Angeles County Congestion Management Program, which regulates regional traffic and is administered by the Los Angeles County Metropolitan Transportation Authority. In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses the attainment of state and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

(a) Southern California Association of Governments' 2016–2040 and 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

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

SCAG's 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016–2040 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians." The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. Further, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.[16] Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for "High Quality Transit Areas," "Livable Corridors," and "Neighborhood Mobility Areas" as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life.[17] High-Quality Transit Areas are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop

[16] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166.*

[17] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 2.*

or a transit corridor with 15-minute or less service frequency during peak commute hours.[18] Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways. Neighborhood Mobility Areas are areas with roadway networks where Complete Streets and sustainability policies support and encourage replacing single and multi-occupant automobile use with biking, walking, skateboarding, and slow speed electric vehicles. Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas.[19] The Project Site is located within a High-Quality Transit Area as designated by the 2016–2040 RTP/SCS.[20,21]

Subsequent to the publication of the Project's Notice of Preparation (NOP) on September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.[22] As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[23] The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.[24] As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the NOP for the Project on May 21, 2018, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS. A detailed list of the goals of the 2016–2040 RTP/SCS applicable to the Project Site is included in Table 4 of Appendix J.1 of this Draft EIR for the Mixed Use Development Scenario and in Table 4 of Appendix J.2 of this Draft

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18 *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.*

19 *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76.*

20 *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 5.1: High Quality Transit Areas In The SCAG Region For 2040 Plan, p. 77.*

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

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

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

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

EIR for the No-Hotel Development Scenario, along with a discussion of whether the Project conflicts or does not conflict with that particular goal.

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

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

(c) Los Angeles County Metropolitan Transportation Authority Congestion Management Program

Metro administers the Congestion Management Program, a state-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The Congestion Management Program, revised in 2010, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The Congestion Management Program guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour be evaluated. The guidelines also require the evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Refer to Section IV.L, Transportation, of this Draft EIR, for further discussion of the Project's consistency with the Congestion Management Program.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with five structures. Four of these structures, situated generally in the center and along the western area of the Project Site, are currently vacant. The fifth structure, situated generally along the northern portion of the Project Site, is currently developed with the Elysian apartment building, which is not part of the Project. The portion of the Project Site that includes part of the Beaudry Avenue frontage around the 1111-1115

Sunset Boulevard lot is currently improved with sidewalks and street trees. The portion of the Project Site that includes the Beaudry Triangle, a triangular road separator that divides Beaudry Avenue at Sunset Boulevard, is currently paved and landscaped with trees and shrubs that are unmaintained and in poor condition.

The Project Site also includes surface parking and circulation areas generally located on the eastern half of the Project Site. Vehicular access to the Project Site is available at driveways along White Knoll Drive and Alpine Street. The Project Site slopes generally east to west with a grade difference of approximately 51 feet. Unmaintained landscaping is dispersed throughout the Project Site.

As previously discussed, the Project Site is currently designated as General Commercial under the Community Plan and is zoned C2-2D (Commercial zone, Height District 2 with Development Limitation).

(2) Surrounding Uses

The Project Site is generally bounded by White Knoll Drive to the north, Alpine Street to the east, Beaudry Avenue to the south, and Sunset Boulevard to the west. The vicinity of the Project Site is primarily developed with commercial and residential uses. Specifically, north of the Elysian apartment building, across White Knoll Drive, are additional multi-family residential uses and an auto repair shop located at White Knoll Drive and Sunset Boulevard. Additional multi-family residential uses continue east of the Project Site, across Alpine Street. South of the Project Site, across Beaudry Avenue, are commercial uses and parking structures. West of the Project Site, across Sunset Boulevard, are a motel, a nightclub, and multi-family residential uses.

3. Project Impacts

a. Thresholds of Significance

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

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

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA

Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate land use:

(1) 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.

(2) Land Use Compatibility

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

b. Methodology

CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, 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. As provided in CEQA Guidelines Section 15126.2 “an EIR shall identify and focus on the significant effects of the proposed project on the environment.” An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *An inconsistency between a proposed project an applicable plan is a legal determination not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.*

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies.[25] Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy. Potential conflicts with any plan, objective, or policy are further analyzed and discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR.

c. Project Design Features

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

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount

[25] *Office of Planning and Research (OPR), State of California General Plan Guidelines (2017).*

of grading, and the types of equipment to be used would be the same under both development scenarios. The differences in the land use mix under the two development scenarios generally do not affect the analytics related to land use. As such, the analysis provided below accounts for both development scenarios and the term "Project" is used unless stated otherwise.

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

(1) Impact Analysis

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would not divide an established community. The Project would replace the existing vacant non-residential structures within the Project Site with a new infill mixed use project. The proposed uses, including residential, hotel (under the Mixed Use Development Scenario), office, and commercial, would be compatible with the residential and commercial land uses in the surrounding area. In addition, while the Project would merge a portion of Beaudry Avenue and Sunset Boulevard adjacent to the Project Site, access would continue to be available through Beaudry Avenue at Sunset Boulevard. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, 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) Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of the General Plan Framework Element, Housing Element, Conservation Element, Mobility Plan 2035, Central City North Community Plan, LAMC, Citywide Design Guidelines, and the City's Walkability Checklist that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Los Angeles General Plan

(1) Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect under the Mixed Use Development Scenario is discussed in detail in Table 1 of Appendix J.1 of this Draft EIR. The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect under the No-Hotel Development Scenario is discussed in detail in Table 1 of Appendix J.2 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 General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

The Project would not conflict with applicable objectives and policies of the General Plan Framework Element Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the mixed use nature of the Project, as well as development of the proposed uses in an area with convenient access to public transit and opportunities for walking and biking, would promote an improved quality of life by facilitating a reduction of vehicle trips and vehicle miles traveled (Objective 3.2). The Project would also support Policy 3.13.5 by incorporating a variety of open space and recreational areas with the mix of uses proposed by the Project, thereby reducing the Project's impacts to parks and recreation. In addition, the Project would support Policy 3.7.1 to accommodate the development of multi-family residential units in areas designated in the community plans through the development of new multi-family residential units within a site permitted for such uses. The mixed use nature of the Project would also facilitate a reduction of vehicle trips thereby minimizing the impacts of traffic (Policy 3.13.6). Therefore, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element's Land Use Chapter.

(b) Housing Chapter

The Project would support the City's objective (Objective 4.1) to plan the capacity for and develop incentives to encourage production of housing units of various types to meet the projected housing needs by income level of the future population by providing a project that would include a variety of new multi-family residential units, including one-bedroom and two-bedroom units as well as affordable housing units. The Project would also support the City's objective (Objective 4.2) to encourage the location of new multi-family housing to occur in proximity to transit by locating a mix of multi-family housing types in an area well-served by public transit. As discussed in detail in Table 1 of Appendix J.1 of this Draft EIR

and Table 1 of Appendix J.2 of this Draft EIR, the Project would not conflict with the applicable objectives that supports the goals set forth in the General Plan Framework Element's Housing Chapter.

(c) Open Space and Conservation Chapter

The Project would support the goals and policies of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site that would be accessible to the public, including landscaped pedestrian walkways and a 20,925-square-foot courtyard referred to as The Hill. The Hill would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown skyline. In total, the Project would provide 82,925 square feet of open space under the Mixed Use Development Scenario and 93,050 square feet of open space under the No-Hotel Development Scenario in accordance with LAMC requirements and would serve to reduce the demand on parks and recreational facilities in the vicinity of the Project Site. Therefore, as provided in Table 1 of Appendix J.1 of this Draft EIR and Table 1 of Appendix J.2 of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element's Open Space and Conservation Chapter.

(d) Economic Development Chapter

The Project would support Objective 7.2 to establish a balance of land uses that provides for commercial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality through the development of a mix of integrated and supporting land uses within one site. Specifically, the Mixed Use Development Scenario would include multi-family residential, hotel with related amenities, office space, and commercial uses, whereas the No-Hotel Development Scenario would include residential, office space, and commercial uses. In addition, the Project would also support Policy 7.2.3 by providing a mix of uses on an underutilized site that has convenient access to public transit, as well as opportunities for walking and biking, the Project would facilitate a reduction in vehicle trips and vehicle miles traveled. This, along with the incorporation of project design features provided in Section IV.A, Air Quality, and Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, would facilitate a reduction in air pollution to ensure maximum feasible environmental quality. The Project would also support the Policy 7.6.3 to facilitate the inclusion of shopping facilities in mixed use development by providing a mixed use development with retail uses that would serve the on-site residents and employees as well as surrounding community. Thus, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element's Economic Development Chapter.

(e) Transportation Chapter/Mobility Plan 2035

The Project would not be in conflict with the relevant policies of Mobility Plan 2035. In particular, the Project would support Policy 1.6 of Mobility Plan 2035 to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan and work site traffic control plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize 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 Policy 2.3 to recognize walking as a component of every trip and ensure high quality pedestrian access to provide a safe and comfortable walking environment by promoting walkability through Project design and pedestrian and streetscape improvements. In addition, the Project would promote Policy 3.1 to recognize all modes of travel by providing adequate and enhanced pedestrian and vehicular access and providing bicycle facilities. The Project would provide dedicated curb-side passenger loading areas and an off-street pick-up/drop-off area in front of the Sunset Building. In addition, the proposed Transportation Center would provide alternative mobility options, such as bicycle and scooter-sharing services, to help improve the convenience of making trips without the use of a personal automobile. The Project would further support Policy 3.3 to promote equitable land use decisions that result in fewer vehicle trips by providing a new development consisting of a mix of uses in proximity to jobs (including those that would be offered on-site), destinations, and other neighborhood services in an area that is well-served by transit. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project would provide all residents, guests, employees, and patrons convenient access to transit services in support of Policy 3.4. Therefore, the Project would not conflict with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035.

(f) Infrastructure and Public Services Chapter

The Project would support Policy 9.3.1 and Objective 9.6 to reduce the total amount of flow entering the stormwater system, as well as pursue effective and efficient approaches to protecting water quality by implementing a SWPPP during construction that would include BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. The Project would also comply with the SUSMP requirements to reduce the discharge of polluted runoff from the Project Site and would comply with the County's LID Standards Manual and the City's LID Ordinance, which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Furthermore, LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years would be sufficient to meet the Project's water demand in addition to the existing and planned future water demands within LADWP's service area through the year 2040. Moreover, the Project would not exceed the available capacity of the water distribution infrastructure that would serve the Project Site.

Additionally, as discussed in Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the existing 8-inch sewer line along Beaudry Avenue has negligible additional capacity. Thus, the Project would implement Project Design Feature WAS-PDF-1, which would require upsizing the existing 8-inch sewer line on Beaudry, in order to ensure adequate capacity is available. Overall, the Project would not conflict with applicable goals, objectives, and policies of the General Plan Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan that were adopted for the purpose of avoiding or mitigating an environmental effect under the Mixed Use Development Scenario is detailed in Table 2 of Appendix J.1 of this Draft EIR. The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan that were adopted for the purpose of avoiding or mitigating an environmental effect under the No-Hotel Development Scenario is detailed in Table 2 of Appendix J.2 of this Draft EIR. As discussed therein, the Project would support Objective 2.2 to produce an adequate supply of housing as well as promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit. The Mixed Use Development Scenario would support this objective through the development of up to 737 residential units, including up to 76 restricted affordable housing units, along with hotel guest rooms, office space, and commercial uses within one site in an area well-served by public transit. The No-Hotel Development Scenario would also support this objective through the development of up to 827 residential units, including up to 76 restricted affordable housing units, along with office space and commercial uses. The Project would also support Objective 2.3 to promote the construction of sustainable buildings by including high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use, Energy Star–labeled appliances, and water-efficient landscape design. The Project would incorporate other sustainable design features, including water conservation features, alternative transportation programs, and pedestrian and bicycle-friendly site, and waste-reduction measures. Therefore, the Project would not conflict with the applicable objectives and policies set forth in the Housing Element.

(3) Los Angeles General Plan Conservation Element

As outlined above, Section 5 of the Conservation Element of the General Plan established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is not listed in the California Register and was not designated as an Historic-Cultural Monument. As determined in the Historic Report prepared for the Project, included as Appendix E.1 of this Draft EIR, the existing buildings on the Project Site do not qualify as historical resources. With respect to indirect impacts, there are two designated historical resources in the vicinity of the Project Site—the Angelino Heights HPOZ, located across Sunset Boulevard from the Project Site; and the residence at 1001 Everett Street, located approximately 0.2 mile north of the Project Site. There are also three properties that were identified in SurveyLA as appearing eligible for designation. As concluded in Section IV.B, Cultural Resources, of this Draft EIR, the Project would not impact the integrity of the residential buildings within the Angelino Heights HPOZ nor would it impair in any way the features that convey the historic district's significance. Similarly, the Project would not diminish the architectural design or integrity of the residence at 1001 Everett Street and it would not cause a substantial adverse change in the significance of the three potential historical resources identified in SurveyLA. Therefore, the Project would not indirectly affect nearby contributing properties or the Angelino Heights HPOZ near the Project Site. Accordingly, the Project would not conflict with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element.

(4) Central City North Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Community Plan under the Mixed Used Development Scenario is discussed in detail in Table 3 of Appendix J.1 of this Draft EIR, and the Project's consistency under the No-Hotel Development Scenario is discussed in detail in Table 3 of Appendix J.2 of this Draft EIR. As discussed therein, the Project under both scenarios would be generally consistent with the objectives and policies that support the goals of the Community Plan. Specifically, the Project would not conflict with Objective 1-1 of the Community Plan to provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the City. The existing Elysian apartments would remain onsite while the existing vacant buildings would be removed to allow for development of the Project, which would include 737 units (76 of which would be affordable housing units) under the Mixed Use Development Scenario and 827 units (76 of which would be affordable housing units) under the No-Hotel Development Scenario. The Project also would not conflict with Objective 1-2 to locate new housing in a manner which reduces vehicular trips as the mixed use nature of the Project would provide the opportunity for people to live, work, and play within one site that is well-served by public transportation. In addition, the Project would not conflict with Goal 4 of the Community Plan to provide adequate recreation and park facilities that meet the needs of the residents in the Community Plan area by providing a variety of open space and recreational areas within the Project Site, including gardens, courtyards, and terraces to meet the recreational needs of residents and visitors of the Project Site. Overall, the Project would not conflict with the

applicable goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(ii) Los Angeles Municipal Code

As previously discussed, the Project Site is designated by the LAMC as General Commercial and zoned C2-2D (Commercial zone, Height District 2 with Development Limitation[26]). As previously described, the Project Site is also located within a Transit Priority Area, as defined by Zoning Information File 2452 and is subject to the Freeway Adjacent Advisory Notice for Sensitive Uses, per ZI File No. 2427. The Commercial zone permits a wide array of land uses, including retail, offices, hotels, and multi-family residential. The zoning of the Project Site does not limit the building height, but rather limits the FAR to 3:1 (Footnote 4 in General Plan Land Use Map and the site specific D limitation) and a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area.

The Project would remove the existing vacant buildings on the Project Site and construct a mixed use development that consists of up to 737 residential units (including up to 76 restricted affordable housing units) and up to 180 hotel rooms under the Mixed Use Development Scenario and 827 residential units (including up to 76 restricted affordable housing units) under the No-Hotel Development Scenario. The Project under both scenarios would also develop up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The Project would comprise 994,982 square feet of floor area. The proposed uses would be built on a six-level parking podium, which would be partially below grade (number of subterranean levels would vary from one to six levels based on topography) and partially above grade, creating a single building on the Project Site. Above the parking podium, the proposed uses would be provided within four primary structures,[27] with a maximum height of 572 feet (Tower A). As outlined above, the C2-2D zone does not specify a building height limit.

Overall, the Project would remove the existing vacant buildings on the Project Site, which comprise approximately 114,600 square feet, and construct 994,982 square feet of new floor area comprised of residential, hotel (under the Mixed Use Development Scenario), office, and commercial uses. This would result in a total FAR of approximately 3.65:1, which would exceed the allowable maximum FAR of 3:1. However, as outlined in Section II, Project Description, of this Draft EIR, the Project would request a 35 percent

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[26] *Ordinance No. 174327, approved by City Council on November 2, 2001, signed by the Mayor on November 15, 2001, effective January 5, 2002.*

[27] *While the proposed structures would appear as separate buildings, the proposed structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking.*

density bonus, pursuant to LAMC Section 12.22 A.25, Density Bonus, allowing for this increased FAR.

Based on the LAMC and Yard Determination issued on November 2, 2017 by the Los Angeles Department of Building and Safety, the Project Site only includes front yards. No front yard setbacks are required in the C2 zone. The Project would provide landscaped buffers where residential uses abut public streets. Generally, the Project's commercial component would be built to the sidewalk. Thus, the Project would comply with all of the setback requirements outlined in the LAMC.

Based on the parking requirements set forth in Section 12.21 LAMC, the Project would require a total of 1,485 parking spaces for the Mixed Use Development Scenario and a total of 1,527 spaces for the No-Hotel Development Scenario.[28] As described in Section II, Project Description, of this Draft EIR, the Project would either provide 933 spaces under Mixed Use Development Scenario or 907 spaces under the No-Hotel Development Scenario within a six-level parking podium, which would be partially below grade and partially above grade in compliance with AB 744 as originally adopted. An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility) located within the northern portion of the footprint of the proposed Courtyard Building. Thus, the Project would comply with the applicable parking requirements of the LAMC. In addition, in accordance with Section 12.21 of the LAMC, the Mixed Use Development Scenario would provide 436 bicycle parking spaces, including 99 short-term and 337 long-term bicycle parking spaces. The No-Hotel Development Scenario would provide 421 bicycle parking spaces, including 81 short-term and 340 long-term bicycle parking spaces. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas.

The Project would also meet the LAMC requirements concerning the provision of on-site open space. The common open space proposed to be provided within the Project Site under the Mixed Use Development Scenario would total 82,925 square feet of common open space, including approximately 70,175 square feet of exterior common open space; 7,800 square feet of interior common open space; and 4,950 square feet of private open space. The common open space proposed to be provided within the Project Site under the No-Hotel Development Scenario would total 93,050 square feet of open space, including approximately 77,075 square feet of exterior common open space; 9,075 square feet of interior common open space; and 6,900 square feet of private open space, pursuant to the

[28] *In accordance with Assembly Bill 744, the Applicant may request lower parking requirements (0.5 parking space per bedroom) as a mixed-income housing project within 0.5-mile of a well-served transit stop providing at least 11 percent of the units for low-income residents.*

requirements of the LAMC. Open space areas would include a 20,925-square-foot courtyard (referred to as The Hill) under both development scenarios that would be located at the center of the Project Site. The Hill would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown Los Angeles skyline. Additional landscaped walkways, plazas, and courtyards would be provided throughout the Project Site. Interior common areas would include resident amenities such as fitness areas, game rooms, lounges and meeting rooms. In addition, a spa and other common areas, such as a lobby with an outdoor terrace, lounge, meeting spaces, restaurants, and a roof top pool would be included as part of the hotel for the Mixed Use Development Scenario.

As discussed above, in November 2012, the Los Angeles City Planning Commission issued an advisory notice (Zoning Information File [ZI] No. 2427) regarding the siting of sensitive land uses within 1,000 feet of freeways. ZI No. 2427 was updated in September 2018. Consistent with the recommendations of ZI No. 2427, the Project would incorporate project design features to minimize air pollution exposure to future on-site residents. Such measures include locating open space areas away from freeway sources and locating air intakes away from the freeway. In addition, the Project would comply with the City's adopted Ordinance No. 184,245, which, among other things, requires the provision of air filtration media that achieves a MERV of 13 for regularly occupied areas of buildings located within 1,000 feet of a freeway.

In summary, with approval of the requested discretionary actions outlined in Section II, Project Description, of this Draft EIR, the Project would be generally consistent with all applicable provisions of the LAMC.

(iii) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all objectives will be appropriate in every case. The Project is determined to be consistent with the Citywide Design Guidelines, as discussed below.

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

Pedestrian access along the perimeter of the Project Site would be provided via new pedestrian walkways from White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. The commercial uses along Sunset Boulevard would also be accessible from entrances along Sunset Boulevard and Beaudry Avenue. In addition, the Project Site would include a series of gardens, courtyards (including the 20,925-square-foot The Hill),

and terraces that would be connected via pedestrian pathways that would include landscaping and other pedestrian amenities. The Project would also provide street trees and landscaping along the sidewalk that surrounds the perimeter of the Project Site. Furthermore, pedestrian access to the proposed parking podium would be provided via a network of convenient pathways leading into the Project Site from the surrounding streets. The Project Site's location within an area that is well-served by transit would further provide pedestrian accessibility and connections within and around the Project Site. Thus, the Project would not conflict with this objective of the Citywide Design Guidelines.

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

Vehicular access to the Project Site would be provided via six vehicular access points as follows:

1. Sunset Boulevard, intended to serve commercial and office uses;
2. White Knoll Drive, providing access to the Elysian Parking Facility and fire and emergency vehicle access;
3. Alpine Street, providing secondary commercial and residential access and primary service access;
4. Beaudry Avenue, providing primary residential access;
5. Beaudry Avenue, providing inbound access to the Sunset Building pick-up/ drop-off area; and
6. Sunset Boulevard, providing right-in/right-out access to and from the Sunset Building pick-up/drop-off area.

Parking would be provided within a six-level parking podium which would be partially below grade and partially above grade based on the topography of the Project Site. The levels of the parking garage that would be at least partially above grade and exposed would be wrapped in active uses, such as an open space terrace, and landscaping, thereby minimizing its appearance. Multiple pedestrian access points, including a series of passageways, stairs, and plazas, would be available throughout the site and the vehicular access points listed above would not discourage and/or inhibit the pedestrian experience. Further, the Project would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up/drop-off area in front of the Sunset Building. Additionally, the Project would widen the sidewalks adjacent to the Project Site, provide a new signalized pedestrian crossing point with continental crosswalks on Sunset Boulevard at White Knoll Drive, and install all-way stop-control at the existing crosswalk on

Beaudry Avenue at Alpine Street. All Project parking would be located behind or below the level of Project buildings and all parking areas would be hidden or screened from the street. There would be several access points to the parking structure around the Project Site, located in such a way as to minimize interaction between vehicles and pedestrians. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

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

The Project would be designed to actively engage with streets and public space. The Project would be located within the current oval-shaped perimeter of the Project Site defined by street edges that are varied and porous, inviting the neighborhood in through a series of passageways, stairs, and plazas. The Project would be comprised of a collection of architectural volumes that are consistent with the scale of the surrounding neighborhood. Low-rise residences would be placed along residential streets to complement the scale of the neighborhood, whereas high-rise buildings with increased volumes and a more defined street wall would be located along Sunset Boulevard. Additionally, the Project would include architectural detail and landscaping that would further integrate the Project with the surrounding neighborhood, such as wrapping exposed areas of the parking podium with active uses and landscaping and including pedestrian access points along the perimeter of the Project Site that are reminiscent of the neighborhood stairs and paseos found in the surrounding hills. In addition, the Project would incorporate a variety of publicly-accessible open space opportunities (including the 20,925-square-foot The Hill) and pedestrian enhancements, as well as ground-floor commercial uses, which would further provide context and linkages between the Project Site and the surrounding neighborhood. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

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

The Project would incorporate site planning and architectural strategies that would complement the scale and character of the surrounding neighborhood. The Project would be located within the current oval-shaped perimeter of the Project Site defined by street edges that are varied and porous, inviting the neighborhood in through a series of passageways, stairs, and plazas. Additionally, the Project would be comprised of a collection of architectural volumes that are consistent with the scale of the surrounding neighborhood. Low-rise residences would be placed along residential streets to complement the scale of the neighborhood, whereas high-rise buildings with increased volumes and a more defined street wall would be located along Sunset Boulevard. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

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

The Project would include a number of landscaped open space areas and recreational amenities, including pathways, gardens, courtyards, and terraces. The primary open space amenity would be a 20,925-square-foot courtyard (The Hill) that would be located at the center of the Project Site and would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown Los Angeles skyline. Interior common areas would include resident amenities such as fitness areas, game rooms, lounges and meeting rooms. In addition, the Project would include a spa and other common areas, such as a lobby with an outdoor terrace, meeting spaces, and restaurants. Additional common and private open space areas would be provided throughout the Project Site. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

(iv) City of Los Angeles Walkability Checklist

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

(1) Sidewalks

The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. As described in Section IV.L, Transportation, of this Draft EIR, the sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The applicable recommended implementation strategies that would be incorporated into the Project include: (1) creating a buffer between pedestrians and moving vehicles by the use of landscaping; (2) providing adequate sidewalk widths; and (3) incorporating closely planted shade-producing street trees. Therefore, the Project

would not conflict with design strategies identified in the Walkability Checklist related to sidewalks.

(2) Crosswalks/Street Crossings

The primary objective defined for crosswalks and street crossings focuses on providing crossings that are safe, easy to use and well-marked, support active, pedestrian-friendly environments, and link both sides of the street physically and visually. The proposed crosswalk would be designed to achieve the following in support of the Walkability Checklist: (1) emphasize pedestrian safety and comfort at crosswalks with devices such as pedestrian crossing signals, push buttons for pedestrian actuated signals, and dual sidewalk ramps that are directed to each crosswalk. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to crosswalks and street crossings.

(3) Building Orientation

Within the Walkability Checklist, building orientation addresses the relationship between building and street as a means of improving neighborhood character and the pedestrian environment. Recommended implementation strategies that would be incorporated into the Project include: (1) grade level entrances from the public right-of-way for pedestrians; (2) primary entrances for pedestrians that are easily accessible from transit stops; (3) primary entrances to buildings that are visible from the street and sidewalk; (4) at least one entrance from the public way at retail establishments with doors unlocked during regular business hours; (5) complying with Americans with Disabilities Act (ADA) guidelines at primary pedestrian entrances; (6) passageways or paseos that facilitate pedestrian movement through the depth of the block to the front of the next parallel block; (7) activate paseos so that they are visually interesting and safe spaces; (8) direct access to building entrances from sidewalks and streets; (9) locating buildings at the front property line or at the required setback to create a strong street wall; (10) architectural features to provide continuity at the street where openings occur, and (11) architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to building orientation.

(4) Off-Street Parking and Driveways

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include: (1) maintaining continuity of the sidewalk; (2) locating parking behind buildings rather than directly exposed to the adjacent major street; (3) creating access to parking from a side street, where possible; (4) accommodating vehicle access to and from the Project Site with as few driveways as

possible; (5) limiting the width of each driveway to the minimum width required; (6) incorporating architectural features on parking structure façades that respond to the neighborhood context and that contribute to "placemaking"; (7) mitigating the impact of parking visible to the street with the use of planting and landscape walls tall enough to screen headlights; (8) illuminating all parking areas and pedestrian walkways; and (9) using architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to off-street parking and driveways.

(5) On-Site Landscaping

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, and add visual relief to the street. As previously described, the Project would increase the amount of landscape and improve the streetscape through landscaping, pedestrian-scaled amenities and creative design. In so doing, the Project would achieve the following implementation strategies: (1) provide canopy trees in planting areas in addition to the street trees; (2) provide plantings that complement pedestrian movement and views; and (3) provide plantings that complement the character of the built environment. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to sidewalks.

(6) Building Façades

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. As discussed above, the Project would address many of the relevant implementation strategies, including: (1) incorporating different textures, colors, materials, screening, and distinctive architectural features that add visual interest; (2) adding scale and interest to building façades by articulated massing; (3) discouraging blank walls by incorporating architectural features, enhanced materials, fenestration, planting, lighting, and signage to contribute to a more pedestrian friendly streetscape; (4) including overhead architectural features, such as awnings, canopies, trellises or cornice treatments that provide shade and reduce heat gain; (5) contributing to neighborhood safety by providing windows at the street; (6) devoting at least 50 percent of façades for ground floor retail uses to pedestrian entrances and pedestrian-level display windows; and (7) utilizing a building wall for security between the structures and the street, eliminating the need for fences at the street. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to building façades.

(7) Building Signage and Lighting

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: (1) pedestrian visibility, building identification, and facilitation of access; (2) adequate lighting levels to safely light pedestrian paths; (3) adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and (4) the use of fixtures that are "dark sky" compliant. Therefore, the Project would not conflict with design strategies identified in the Walkability Checklist related to building signage and lighting.

As such, based on the above, the Project would not conflict with relevant aspects of the Walkability Checklist.

(b) Consistency with Regional Plans

(i) 2016–2040 and 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS)

As discussed above, on September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal. As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the NOP for the Project on May 21, 2018, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

The Project's general consistency with the applicable goals set forth in the 2016–2040 RTP/SCS under the Mixed Use Development Scenario is analyzed in Table 4 of Appendix J.1 of this Draft EIR. The Project's general consistency with the applicable goals set forth in the 2016–2040 RTP/SCS under the No-Hotel Development Scenario is analyzed in Table 4 of Appendix J.2 of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG High-Quality Transit Area and City of Los Angeles Transit Priority Area, as defined in the City's ZI File No. 2452. In addition, the

Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. Additionally, a dedicated Transportation Center would be placed near pedestrian access to the commercial uses to provide support for and access to alternative transportation modes such as a Metro Bike Share station and/or other personal transportation modes. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking.

(ii) South Coast Air Quality Management District Air Quality Management Plan and County of Los Angeles Congestion Management Plan.

As analyzed in Section IV.A, Air Quality and Section IV.L, Transportation, of this Draft EIR, the Project would not conflict with the applicable policies set forth in the SCAQMD's AQMP or the Los Angeles County's CMP, respectively.

(c) Conclusion Regarding Impacts Relative to Land Use Consistency

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

(2) Mitigation Measures

The Project's impact related 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 related 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, there are 89 related projects in the vicinity of the Project Site. The related projects generally consist of infill development including mixed use, retail, restaurant, residential, and office uses. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies, and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, the Project and related projects would not result in significant cumulative impacts related to land use consistency. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to land use consistency would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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