

IV. Environmental Impact Analysis

I. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including Section IV.B, Air Quality, which evaluates the Project's consistency with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) and the City of Los Angeles (City) General Plan (General Plan) Air Quality Element; Section IV.F, Greenhouse Gas Emissions, which evaluates the Project's consistency with the 2022 Scoping Plan, the Los Angeles Green Building Code, and the Green New Deal; Section IV.M, Transportation (and the Transportation Assessment and Supplemental Transportation Assessment included as Appendix K.1 and K.2 of this Draft EIR), which evaluates the Project's consistency with the City's Mobility Element 2035 and Vision Zero Action Plan, as well as many of the plans discussed herein as they relate to transportation; and Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, which evaluates the Project's consistency with the Los Angeles Department of Water and Power (LADWP) Urban Water Management Plan (UWMP). Project consistency with the Southern California Association of Governments (SCAG) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is evaluated in this section and also in Sections IV.B, Air Quality, IV.F, Greenhouse Gas Emissions, and IV.K, Population and Housing, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65300 *et seq.*
- Senate Bill 375

- Senate Bill 743
- Santa Monica Mountains Conservancy Act and Santa Monica Mountains Conservancy Santa Monica Mountains Comprehensive Plan
- Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Central City North Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) California Government Code Section 65300 et seq.

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

(b) Senate Bill 375

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

incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(c) Senate Bill 743

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

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

PRC Section 21064.3 defines “major transit stop” as “a site containing any of the following: (a) [a]n existing rail or bus rapid transit station[;] (b) [a] ferry terminal served by either a bus or rail transit service[;] (c) [or t]he intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.”¹

(d) The Santa Monica Mountains Conservancy Act

Assembly Bill 1312 (1979), the Santa Monica Mountains Conservancy Act, establishes the Santa Monica Mountains Zone (SMMZ), which is mapped by the Santa Monica Mountains Conservancy (SMMC). The SMMC’s mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public and PRC Section 33105 defines the SMMZ as a “unique and valuable economic, environmental, agricultural, scientific, educational, and

¹ California Assembly Bill 2553, which went into effect on January 1, 2025, amends Section 21064.3 of the Public Resources Code to revise the definition of “major transit stop.” The new definition increases the service interval frequency to 20 minutes, whereas the previous definition required a frequency of 15 minutes or less during peak commute periods.

recreational resource.”² In addition to the Santa Monica Mountains, the SMMZ includes Elysian Park and El Pueblo de Los Angeles State Historic Park (LASHP) and, for purposes of providing a recreational trail corridor, it shall also include hiking and equestrian trail connections and accessways between Griffith Park, Elysian Park, and LASHP.³ The applicable provisions of the PRC do not establish policies specific to private development projects within the SMMZ.

Initial goals and objectives of the SMMC are set forth in the 1979 Santa Monica Mountains Comprehensive Plan (SMMCP).⁴ The guiding principle of the SMMCP is to let the land dictate the use. The overall goal is to accommodate land uses that will least damage the natural and manmade environment, given the constraints the land itself imposes, with this goal set aside only if adhering to it will mean that the region will lose benefits of overriding importance. The SMMCP contains multiple elements (i.e., Land Use, Conservation, Recreation, Transportation, Scenic Parkways and Corridors, Trails, Public Services/Facilities, Economic, and Implementation). The Land Use Element emphasizes the preservation of the remaining natural resources of the Santa Monica Mountains for the enjoyment of present and future generations. It balances this emphasis by allowing development where the land is capable of supporting it and where urban services are available or can be extended easily. The SMMC has also established additional planning goals and objectives through strategic planning processes based on substantial public input as well as updated work programs (e.g. the Rim of the Valley Trails Corridor Master Plan).

(2) Regional

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

SCAG is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as an MPO and, under state law, as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. The agency develops long-range regional transportation plans, including SCS and growth

² Santa Monica Mountains Conservancy, <https://smmc.ca.gov/about-us/who-we-are-and-what-we-do-history-mission-and-accomplishments/>, accessed June 2, 2025

³ PRC Section 33105.

⁴ State of California, Santa Monica Mountains Comprehensive Planning Commission, Santa Monica Mountains Comprehensive Plan, adopted February 1979, revised for submission to the Secretary of the Interior August 1979.

forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the SCAQMD's AQMP.

On April 4, 2024, SCAG's Regional Council adopted the 2024–2050 RTP/SCS.⁵ The 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the needs of the region both today and in the future. The goals for the 2024–2050 RTP/SCS address mobility, communities, environment and economy, as follows:

- Mobility: Build and maintain an integrated multimodal transportation network.
- Communities: Develop, connect and sustain communities that are livable and thriving.
- Environment: Create a healthy region for the people of today and tomorrow.
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.

The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ). However, projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. These projections are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG's core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband and mobility hubs. The 2024–2050 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS's vision and achievement of SCAG's goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development

⁵ *It should be noted that the California Air Resource Board (CARB) has not yet approved SCAG's 2024–2050 RTP/SCS.*

Areas (PDAs), housing in the region, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and agricultural lands preservation, and climate resilience. SCAG has identified development within PDAs, providing sufficient housing opportunities, developing 15-minute communities, and fostering equitable decision-making as the framework for implementing the Regional Planning Policies. The Project's potential to conflict with the relevant policies of the 2024–2050 RTP/SCS is provided further below.

The 2024–2050 RTP/SCS defines PDAs as areas within the SCAG region where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis, and are used for different purposes, such as growth visioning, performance measurement or grant applications. As a general principle, development in PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs),⁶ Livable Corridors,⁷ TPAs,⁸ and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also High Quality Transit Corridors (HQTCs).⁹

⁶ *In accordance with the SCAG 2024-2050 RTP/SCS, Neighborhood Mobility Areas (NMAs) “include four elements that reflect potential to improve, restore and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways and other destinations. The four elements of an NMA are: 1) intersection density, 2) low-speed streets, 3) land use diversity, and 4) accessibility to amenities within one mile using street network distances. NMAs exist in each county and throughout the region, and can vary in their specific form, regardless of whether the NMA is located in a dense urban neighborhood or a historic business district. SCAG developed a region-wide map of neighborhood mobility to help further strategies and policies within Connect SoCal 2024.”*

⁷ *SCAG defines Livable Corridors as “areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. Growth at strategic nodes along key corridors, many of which are within High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT), other features improving bus performance and user experience, and certain active transportation improvements, to support safe bicycling and walking.”*

⁸ *In accordance with PRC Section 21099(a)(7), a transit priority area is “an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.”*

⁹ *A high-quality transit corridor is defined in PRC Section 21155(b) as “a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The City defines peak hours as Monday through Friday, between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M. It should be noted that AB 2553, approved on September 19, 2024, amends PRC Section 21064.3 to revise the definition of “major transit stop.” The new definition increases the service interval frequency to 20 minutes, whereas the previous definition required a frequency of 15 minutes or less during peak commute periods.*

(3) Local

(a) City of Los Angeles General Plan

The City's General Plan,¹⁰ originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,¹¹ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

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

(1) Land Use Chapter

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

¹⁰ City of Los Angeles, Department of City Planning, *City of Los Angeles General Plan*, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed March 3, 2025.

¹¹ The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

(2) Housing Chapter

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

- Concentrating opportunities for new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards that are located near existing or planned major transit facilities and are characterized by low-intensity or marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and
- Focusing mixed commercial/residential uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

(3) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings and, second, to enhance the physical character of neighborhoods and communities within the City.¹² The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

¹² *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

(4) Open Space and Conservation Chapter

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

(5) Economic Development Chapter

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

(6) Transportation Chapter

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

(7) Infrastructure and Public Services Chapter

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

(ii) Mobility Plan 2035

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

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

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

(iii) Conservation Element

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

(iv) Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The 2021–2029 Housing Element, which was adopted on November 24, 2021, and amended on June 14, 2022, identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

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

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

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and

implementation programs to elevate health as a priority for the City's future growth and development.¹³ Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues, such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5, An Environment Where Life Thrives*, which identifies the following environmental policies:

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

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

(vi) Central City 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 Central City North Community Plan area as a community that: preserves and enhances the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new

¹³ *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, November 2021.*

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 Central City North Community Plan area.

The Department of City Planning recently updated 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, which became effective on January 27, 2025. Since the application for the Project was filed and deemed complete before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to this Project. As such, the Central City North Community Plan is still the operative land use document for the Project Site, and, therefore, DTLA 2040 is not applicable to the Project or Project Site.

(b) Los Angeles Municipal Code

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

(c) Citywide Design Guidelines

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

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is approximately 8.08 acres and is partially developed, with portions of the Project Site currently used for transportation operations and maintenance-related facilities, bus parking, and construction staging.¹⁴ The Project Site's topography consists of a south-facing vegetated sloped area that spans from the North Parcel to the South Parcel until reaching the vicinity of the Mandarin Plaza, at which point the South Parcel becomes mostly paved. The sloped area faces toward the Los Angeles County Metropolitan Transportation Authority (Metro) A Line tracks and the LASHP and consists mainly of bare ground with limited vegetation, containing remnants of concrete foundations/footings, and retaining walls. Chain link fencing is located along the perimeter of the Project Site between North Broadway and the Metro A Line tracks. The Project Site includes 20 existing on-site trees, consisting of Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), and desert fan palm (*Washingtonia filifera*), and three street trees consisting of jacaranda trees (*Jacaranda mimosafolia*), none of which are protected under the City's Protected Tree and Shrubs Ordinance (Ordinance No. 186,873).¹⁵ Further, the Project Site has 13 static billboards along North Broadway, including 3 billboards on the South Parcel and 10 billboards on the North Parcel.

A portion of the Zanja Madre is exposed at grade within the Metro A Line property generally across from Bishops Road near the narrowest portion of the South Parcel. The Zanja Madre (the "Mother Ditch"), a subsurface brick conduit constructed in 1781, was the first irrigation ditch that would eventually be expanded into a complex network of irrigation ditches to convey water from the Los Angeles River to the El Pueblo de Los Angeles and local agricultural lands. Through investigations as a part of this Draft EIR, a portion of the Zanja Madre has been identified in the South Parcel of the Project Site.

The Cornfield/River Station is designated Historic Cultural Monument No. 82. The Cultural Heritage Board of the City of Los Angeles designated the "River Station Area/Southern Pacific Railroad" as HCM No. 82 on June 16, 1971. The designated boundary comprises the current sites of the LASHP, the Metro A Line right-of-way, and the Project Site, collectively. At the time of designation, the River Station site was said to retain many vestiges of 19th-century railroading: "The freight yards, warehouses, tracks, switch houses,

¹⁴ The Project involves the dedication of a three-foot-wide strip along North Broadway to the City resulting in a net acreage of 7.87 acres.

¹⁵ The Tree Resource, 2016 Tree Report, 2020 Tree Survey and Update Memorandum, and 2021 Tree Survey Update Memorandum. See Appendix A of the Initial Study included as Appendix A of this Draft EIR.

docks and cobblestone pavement may still be seen in their original setting.” Nevertheless, according to Cultural Heritage Board meeting minutes from June 16, 1971, the Board “unanimously agreed that recognition of the River Station Area would exclude any structures located therein.” This fact was noted in 1998, when a City staff report recommended allowing the demolition of a 1958 car and auto repair shop, stating that “the HCM declaration for this property specifically excluded any structures.” Moreover, a 1999 preliminary historic assessment noted that the River Station site lacks integrity due to the changes that have occurred since its 1971 HCM No. 82 designation, including the destruction of the Southern Pacific Railroad (SPRR) Office and Freight House A by fire in 1978, and that the historic resource has for all intents and purposes been destroyed.

As noted above, the Project Site is located in the City’s Central City North Community Plan area. As shown in Figure IV.I-1 on page IV.I-16, the Community Plan’s land use designation for the Project Site is Light Industrial, and the Project Site is zoned as MR2-1 (Restricted Light Industrial). As shown in Figure IV.I-2 on IV.I-17, the MR2 zone corresponds to the Project Site’s Light Industrial land use designation. The MR2 zone allows for various industrial and manufacturing uses, as well as uses permitted under the MR1 zone, including commercial manufacturing and limited commercial uses. The “1” in the Project Site’s zoning designation refers to the Project Site’s location in Height District 1. All uses located in the MR2 zone and within Height District 1 are restricted to a maximum floor area ratio (FAR) of 1.5 times the property’s buildable area. Height District 1 does not impose a vertical height limitation on the Project Site.

The Project Site is also located within the boundaries of the SMMZ.

(2) Surrounding Uses

The Project Site is located within an urbanized area and includes a mix of land uses located north of downtown Los Angeles within the vicinity of the Chinatown neighborhood. The Project Site is adjacent to the Metro A Line tracks to the southeast. The South Parcel is located approximately 400 feet north of the Metro A Line Chinatown Station. The LASHP (formerly Cornfield Park) contains 32 acres of active and passive open spaces and recreational amenities, located to the southeast of the Metro A Line tracks.¹⁶ The Capitol Milling Company is located south of the Project Site and includes retail uses, restaurants, and offices. Various industrial, commercial, and warehouse uses, are located along the southeastern side of North Spring Street and along Baker Street. A channelized portion of the Los Angeles River is located approximately 575 feet east of the northeastern-most portion of the Project Site. The South Parcel is largely located behind Mandarin Plaza commercial center, which includes one- and two-story commercial buildings and a two-level

¹⁶ *California State Parks, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 10, 2005, p. 3.*



LEGEND

RESIDENTIAL

- Low Medium II
- Medium
- High Medium

COMMERCIAL

- Commercial
- Commercial

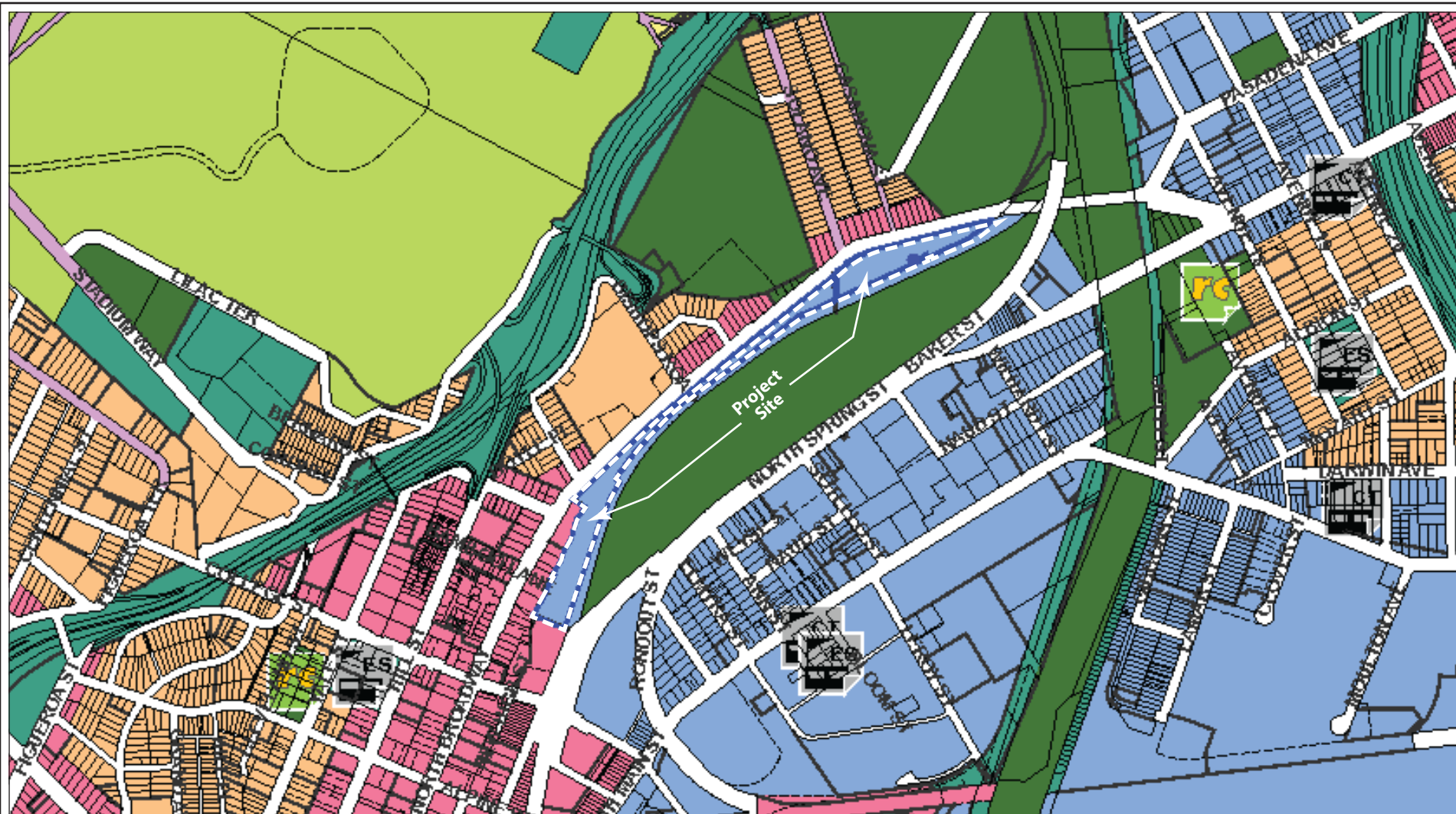
INDUSTRIAL

- Light
- Hybrid Industrial

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public Facilities

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



LEGEND

GENERALIZED ZONING

OS, GW

A, RA

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

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

CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI

PF

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

parking structure located along the frontage of North Broadway. Northwest of the Project Site, across North Broadway are various commercial uses, a high school, religious centers, surface parking lots, multi-family residences, and vacant lots. In addition, located across North Broadway is the approximately 600-acre Elysian Park, Radio Hill Gardens, and the Solano Canyon residential neighborhood, which includes single- and multi-family homes. Dodger Stadium is also located approximately 0.45 miles to the northwest of the Project Site.

3. Project Impacts

a. Thresholds of Significance

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

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

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

As discussed further below, the Initial Study prepared for the Project, and included as Appendix A of this Draft EIR, determined that the Project would result in a less-than-significant impact related to the Project's potential to physically divide an established community (Threshold (a)). For the remaining threshold, the Appendix G Thresholds provided above are relied upon. The analysis utilizes factors and considerations identified in the City's *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

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

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

b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between

a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by CEQA Guidelines Section 15382. Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

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

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. As discussed in the Governor’s Office of Planning and Research (OPR), State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.¹⁷ The analysis below provides a discussion of Project’s consistency with applicable goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect in the SMMC Act, 2024–2050 RTP/SCS, General Plan Framework Element, the Mobility Plan, Conservation Element, Health and Wellness Element, Central City North Community Plan, LAMC, and the Citywide Design Guidelines.

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.

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

d. Analysis of Project Impacts

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

As discussed in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would not divide an established community. The Project would develop the Project Site with a new mixed-use project comprised of residential and commercial uses. The proposed uses would be consistent with the mix of land uses located in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the permanent closure of any surrounding travel routes. Furthermore, the Project Site and vicinity are in a previously developed area, and the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. The Project would provide a new pedestrian access through the South Parcel that would provide access from North Broadway to Spring Street and access to all surrounding properties would continue to be available upon buildout of the Project. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, no impacts with respect to Threshold (a) would occur. No further analysis is required.**

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

(1) Impact Analysis

(a) Consistency with State and Regional Plans

(i) Santa Monica Mountains Comprehensive Plan

As discussed above, the Project Site is located within the SMMZ and goals and objectives for the SMMZ are included in the SMMCP. Project consistency with the applicable policies of the SMMCP's Land Use Element is provided below:

Policy 1 (Resource Protection): Development should be restricted in areas most suited for recreation or in areas needing special protection to retain and protect valuable and unique environmental resources.

Consistency Analysis: As discussed above, the Project Site is located in an urbanized area approximately 400 feet north of the Metro A Line Chinatown Station and is currently used for transportation operations and maintenance-related facilities, bus parking and construction staging. There are no natural areas or valuable and unique environmental resources within the Project Site. Specifically, as concluded in the Initial Study, included in Appendix A, of this Draft EIR, no native habitat is located on the Project Site or on the

adjacent properties and there are no riparian or other sensitive natural vegetation communities identified by the United States Fish and Wildlife Service or California Department of Fish and Wildlife located on the Project Site. Further, the Project Site is constrained by both topography and size, limiting its utility for recreation uses. Despite its proximity to the nearby Los Angeles Historic State Park, the intervening rail tracks, limited size, and steep grade would preclude use as an expansion of the park or as a recreation site. Thus, the Project would not conflict with this policy.

Policy 2 (Development in Low-Constraint Areas): Housing and employment should be directed to areas which are near major transportation arteries and where the essential urban services are available or can be readily extended. Future development should be directed towards areas which are relatively free of natural constraints.

Consistency Analysis: As discussed above, the Project Site is located in an urbanized area, approximately 400 feet north of the Metro A Line Chinatown Station. In addition, the Project Site is located within a SCAG-designated PDA (i.e., NMA and Livable Corridor) as well as a HQTC, where development is encouraged. The Project Site is also located in an area where urban services are readily available. In addition, as discussed above for Policy 1, the Project Site is free of natural constraints. Therefore, the Project would not conflict with this policy.

Policy 3 (Density): In the high-resources constraint areas of the Santa Monica Mountains, development densities should be kept low (5-to-40 acres per dwelling unit) to maintain a rural land use pattern with a minimum of urban services and with open space for protection of the environment. Development densities in areas of low resource constraints should be provided to satisfy most of the foreseeable demand for development in the Santa Monica Mountains.

Consistency Analysis: The Project Site is not located in a rural or high-resources constraint area. Rather, as discussed above, the Project Site is located in an urbanized area 400 feet north of the Metro A Line Chinatown Station where density is encouraged by SCAG. Therefore, the Project would not conflict with this policy.

Policy 7 (Efficient Land Use Pattern): Pollution from motor vehicles should be reduced by a land use pattern which prevents urban sprawl, results in fewer vehicle trips and more efficient transit services, and institutes energy conservation.

Consistency Analysis: As discussed above, the Project Site is located in an urbanized area, approximately 400 feet north of the Metro A Line Chinatown Station. In addition, the

Project Site is located within a SCAG-designated PDA (i.e., NMA and Livable Corridor) as well as a HQTC, where development is encouraged. In addition, as discussed in Section IV.M, Transportation of this Draft EIR, the Project would not result in significant impacts associated with vehicle miles traveled. Rather, the Project would provide new housing and commercial uses in an area with substantial public transit choices and would assist in reducing vehicle miles traveled. In addition, as discussed in Section II, Project Description of this Draft EIR, the Project would also implement numerous energy conservation features. Therefore, the Project would not conflict with this policy.

Policy 8 (Sewer Extension): Sanitary sewers should not be extended into rural areas where large parcels can accommodate septic tanks.

Consistency Analysis: The Project would require neither the extension of sanitary sewers into rural areas or the use of septic tanks. Therefore, the Project would not conflict with this policy.

Policy 9 (Effluent Discharge): Discharge from sanitary treatment plants and septic systems into streams and lakes should not be allowed.

Consistency Analysis: The Project would not discharge wastewater into streams or lakes. Rather, the Project would connect to the City's existing sanitary sewer lines. Therefore, the Project would not conflict with this policy.

Policy 11 (Preference for Recreational Land Uses): Residential density should be restricted where residential traffic and recreational traffic compete for limited road capacity.

Consistency Analysis: Roadway capacity in the Project vicinity is abundant and includes access to numerous freeways as discussed in Section IV.M, Transportation (and the Transportation Assessment and Supplemental Transportation Assessment included as Appendix K.1 and K.2 of this Draft EIR). Therefore, the Project would not conflict with this policy.

Based on the above, the Project would not result in significant impacts and would not conflict with the applicable land use policies of SMMCP's Land Use Element.

(ii) Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

The Project's potential to conflict with the applicable Regional Planning Policies set forth in the 2024–2050 RTP/SCS is analyzed in Table 1 of Appendix H of this Draft EIR. As summarized below and detailed therein, the Project would not conflict with the applicable

Regional Planning Policies set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

The Project Site is located within a SCAG-designated PDA (i.e., NMA and Livable Corridor) as well as a HQTC, which indicates alignment with the goals of the 2024–2050 RTP/SCS. Additionally, the Project includes a TDM Program which incorporates TDM measures as required by the existing TDM Ordinance (LAMC 12.26 G) to display local transit information for the promotion and marketing of alternative transportation modes and choices. The Project would also include the implementation of strategies that exceed the requirements established in the TDM Ordinance, included as Project Design Feature TR-PDF-2, which comprises a reduced parking supply, pedestrian amenities, neighborhood enhancement, transit infrastructure improvements and bicycle parking which would encourage the use of transit, reduce total VMT and single-occupant vehicle (SOV) dependency. Further, the Project would support local, regional, state, and federal efforts to produce and preserve affordable housing while meeting additional housing needs, including the City's SCAG RHNA-identified share of regional housing, by constructing 986 residential units, 200 of which would be affordable units, in transit-supportive, and walkable areas. Thus, the Project would not conflict with the Regional Planning Policies related to TDM, PDAs, or housing the region.

The Project would support the 2024–2050 RTP/SCS Regional Planning Policies regarding complete streets and safety, as the Project would be develop within an existing urbanized area served by an established network of roads and freeways that provide safe local and regional access to the area, including the Project Site. The Project would also comply with all design requirements which may affect public rights-of-way, including proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design that does not hinder sight distance, mobility, or accessibility. The Project's streetscape improvements would enhance the pedestrian experience with new street trees and shrubs along all Project frontages. The Project would also include pedestrian-only entrances separate from vehicular access points and would provide a signalized crosswalk across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park, which would minimize potential vehicle-pedestrian conflicts. The Project frontages would also include improved lighting, wayfinding signage, and bicycle parking to enhance the experience for all users. Thus, the Project would not conflict with the Regional Planning Policies related to complete streets and safety.

Based on the above and as presented in Table 1 in Appendix H of this Draft EIR, overall, the Project would support the relevant Regional Planning Policies within the

2024–2050 RTP/SCS. Therefore, the Project would not conflict with the applicable goals of the 2024–2050 RTP/SCS.¹⁸

(b) 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 potential to conflict with applicable goals, objectives, and policies of the General Plan, including the Framework Element, the Mobility Plan, Housing Element, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), and Central City North Community Plan; LAMC (Zoning Code); and Citywide Design Guidelines 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 potential to conflict 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 is discussed in detail in Table 2 of Appendix H of this Draft EIR. A general discussion of the Project's potential to conflict with applicable General Plan goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect is provided below.

(a) Land Use Chapter

The Framework Element's Land Use Chapter establishes districts, centers, and mixed-use boulevards which are described by ranges of intensity/density, heights, and lists of typical use. As discussed in detail in Table 2 of Appendix H of this Draft EIR, the South Parcel appears to be located within the boundary of a designated Regional Center. The Project would not conflict with the goals, objectives, and policies related to a Regional Center. In particular, the proposed mix of high-density residential and commercial uses would be consistent with existing residential and commercial uses in the Project vicinity. The Project would also provide approximately 15,000 square feet of retail uses and 23,800 square feet of restaurant uses, which would provide additional opportunities for commercial services

¹⁸ 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. Specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland* (*Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719), state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

within the community and provide employment opportunities. Additionally, the Project would provide access to the Metro A Line from North Broadway and would promote pedestrian activity along North Broadway. Furthermore, the Project would enhance the streetscape and provide publicly accessible open space.

Within the land use chapter, the Project would support Goal 3A for a physically balanced distribution of land uses that facilitates provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, conservation of existing residential neighborhoods, and assurance of environmental justice and a healthful living environment. Additionally, the Project would be consistent with Objective 3.4 to encourage new multi-family residential, retail commercial and office development in the City's neighborhood districts, community, regional, and downtown centers, as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts. In particular, the Project would promote a more balanced distribution of land uses by introducing a mixed-use development within a community center consisting of 986 residential units, including 200 affordable units, 15,000 square feet of retail uses, and 23,800 square feet of restaurant uses.

The Project would support Objective 3.2 and Policy 3.2.3 by developing an underutilized site with convenient access to public transit, expanding pedestrian connections and opportunities for walking from Broadway to Spring Street, and promoting an improved quality of life by facilitating a reduction of vehicle trips and VMT. Additionally, the Project includes a TDM Program which incorporates TDM measures as required by the existing TDM Ordinance (LAMC 12.26 G) to display local transit information for the promotion and marketing of alternative transportation modes and choices. Further, the Project would include the implementation of strategies that exceed the requirements established in the TDM Ordinance, as identified in Project Design Feature TR-PDF-2, comprising a reduced parking supply, pedestrian amenities, neighborhood enhancement, transit infrastructure improvements, and bicycle parking, which would encourage the use of transit and reduce total VMT and SOV dependency. The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards.

As such, the Project would support the reduction of traffic congestion, improvement of air quality, enhancement of recreation and open space opportunities, conservation of existing residential neighborhoods, and assurance of environmental justice and a healthy living environment. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(b) Housing Chapter

The Framework Element's Housing Chapter presents an overview of the critical issues related to housing in Los Angeles, provides goals to guide future actions, and policies to address housing issues. Within the Housing Chapter, the Project would support Goal 4A to provide an equitable distribution of housing opportunities by type and cost through the development of 986 residential units, including 200 affordable units. The South Parcel would provide 631 residential units comprised of two live-work units, 106 studio units, 293 one-bedroom units, 195 two-bedroom units, and 35 three-bedroom units. The North Parcel would provide 355 residential units comprised of five live-work units, 38 studio units, 175 one-bedroom units, 112 two-bedroom units, and 25 three-bedroom units. The Project would, therefore, also support 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 of the future population. The Project would support Objective 4.2 to encourage the location of new multi-family housing in proximity to transit stations through the development of residential units on a Project Site that is served by a variety of public transit options provided by Metro, Los Angeles Department of Transportation (LADOT), Santa Clarita Transit (SCT), Antelope Valley Transit Authority (AVTA), and Torrance Transit.¹⁹ The Project Site is also served by the Metro A Line Chinatown Station, located approximately 400 feet south of the Project Site, and Union Station, located approximately 0.55 miles southeast of the Project Site. In addition, the Project would be designed to avoid conflict with the density and scale of the surrounding development as the Project would introduce uses similar to and compatible with the mix of land uses surrounding the Project Site and would be developed at a similar size and scale. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Housing Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter is built around two concepts: "urban form" and "neighborhood design." The Framework element defines "urban form" as (a) the "general pattern of building height and development intensity" and (b) the "structural elements" that define the City physically, such as natural features, transportation corridors (including the planned fixed rail transit system), open space, public facilities, as well as activity centers and focal elements. "Neighborhood design" is defined as the physical character of neighborhoods and communities within the City. Within the Urban Form and Neighborhood Design Chapter, the Project would support Objective 5.5 of enhancing the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm by constructing a new mixed-use development that would include new residential and commercial uses and pedestrian connectivity.

¹⁹ Metro and LADOT provide bus stops along North Broadway and SCT, AVTA, and Torrance Transit.

Specifically, the Project would include a total of approximately 132,949 square feet of open space within the Project Site of which 45,377 square feet would be publicly accessible, privately operated and maintained. Additionally, the Project would support Objective 5.8 by encouraging the establishment of a strong pedestrian orientation in a community center through incorporating numerous on-site publicly accessible activation areas, such as promenades, seating areas, courtyards, and plazas, which would promote pedestrian activation and walkability at the street level. In addition, a Central Greenspace would be constructed in the central portion of the Project Site to connect the North Parcel and the South Parcel. The narrow open space area would link the North Parcel and South Parcel, and would be landscaped with native trees and understory vegetation. While the sloped area of the Central Greenspace would be inaccessible to pedestrians due to steep southeast facing slopes, the Central Greenspace would be adjacent to the continuous sidewalk for pedestrians along North Broadway, which would also be lined with new street trees. Furthermore, the Project would provide new pedestrian access through the South Parcel that would provide access from North Broadway to North Spring Street.

The Project would also be designed with numerous security features that would support the Objective 5.9 of encouraging proper design and effective use of the built environment to help increase personal safety at all times of the day. Specifically, the Project would be designed such that entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas, elevators, and lobbies would also be sufficiently lit to maximize visibility and reduce areas of concealment. Furthermore, as discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, the Project would incorporate Project Design Features POL-PDF-1 through POL-PDF-3 to increase Project Site security and minimize the Project's demand for police protection services. Specifically, pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures during construction, including security patrols, fencing and lighting to secure the Project Site during construction. Pursuant to Project Design Feature POL-PDF-2, the Project would implement a 24-hour/seven-day security plan incorporating on-site security staff; security cameras; adequate lighting of parking facilities, elevators, pedestrian walkways, building entries, open spaces and lobbies to reduce areas of concealment; design of public spaces to be easily patrolled and accessed by safety personnel; and design of entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Lastly, pursuant to Project Design Feature POL-PF-3, the Applicant would consult with the Los Angeles Police Department (LAPD) regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site to the LAPD showing access routes and other information that might facilitate police response. Overall, the uses and improvements proposed by the Project would enhance the quality of the Project Site and the area in the vicinity of the Project Site and the public realm.

The Project also supports Policy 5.8.4 regarding signage that is integrated with the architectural character of the buildings and conveys a visually attractive character. Signage would be located at a height and of size that is visible to pedestrians and that facilitates access to the building entrances. Additionally, of the 13 existing billboards at the Project Site, only four billboards would remain on the North Parcel. Furthermore, a wayfinding signage system would be located along the public walkways through the Project Site, which would facilitate pedestrian passage through the Project Site to and from the Metro A Line Chinatown Station.

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

(d) Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter contains goals, objectives, and policies for the provision, management, and conservation of the City's open space resources, as well as to address the outdoor recreation needs of the City's residents. The Project would promote the goals and objectives of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. Specifically, the Project would contribute to Open Space and Conservation Goal 6A for an integrated citywide/regional public and private open space system that serves and is accessible by the City's population by providing a total of approximately 132,949 square feet of open space within the Project Site of which 45,377 square feet would be publicly accessible but privately operated and maintained. Further, the Project would include approximately 84,872 square feet of residential common open space, which would be accessible to the residents, and 2,700 square feet of private open space, which would consist of private residential balconies. On the South Parcel, the Project would provide 34,967 square feet of publicly-accessible open space, 46,498 square feet of common open space, and 1,250 square feet of private open space, for a total of 82,715 square feet of open space on the South Parcel. Indoor common open space on the South Parcel would include amenities, such as lounge areas, community rooms, and meeting room space. On the North Parcel, the Project would provide 10,410 square feet of publicly-accessible open space, 38,374 square feet of residential common open space, and 1,450 square feet of private open space, for a total of 50,234 square feet of open space. Indoor common open space on the North Parcel may include amenities, such as lounge areas and meeting room space. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(e) Economic Development Chapter

The Framework Element's Economic Development Chapter contains goals, objectives, and policies that are designed to facilitate business retention and job growth in a variety of ways, including, but not limited to, providing appropriate sites and infrastructure to accommodate future commercial and industrial growth, and focusing the City's economic development efforts more effectively to utilize available resources. The Project would support Economic Development Chapter Objective 7.2 to establish a balance of land uses that provides for residential uses (including affordable units) and commercial development that meets the needs of local residents and sustains economic growth while assuring maximum feasible environmental quality by providing a balanced mix of land uses that would include high-density residential uses and ground floor commercial space. The commercial uses would help meet the needs of local residents and foster continued economic investment. In addition, the Project Site is served by the Metro A Line Chinatown Station and various local bus lines and provides opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, per capita VMT, GHG emissions, and air pollution to ensure maximum feasible environmental quality.

The Project would also support Economic Development Chapter Objective 7.9 to ensure that the available range of housing opportunities is sufficient by providing different housing unit types at various costs through the development of 986 residential units, including 200 affordable units. As previously discussed, the South Parcel would provide 631 residential units comprised of two live-work units, 106 studio units, 293 one-bedroom units, 195 two-bedroom units, and 35 three-bedroom units. The North Parcel would provide 355 residential units comprised of five live-work units, 38 studio units, 175 one-bedroom units, 112 two-bedroom units, and 25 three-bedroom units. Thus, the Project would not conflict with the applicable objectives and policies set forth in the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(f) Infrastructure and Public Services Chapter

The Framework Element's Infrastructure and Public Services Chapter contains goals, objectives, and policies that are designed to seek solutions to public infrastructure and service. The Project would support Framework Element Infrastructure and Public Services Chapter Goal 9B and Objective 9.6 pertaining to effective and efficient approaches to protecting water quality. The Project would support the City's policy and objectives pertaining to effective and efficient approaches to protecting water quality by implementing a Stormwater Pollution Prevention Plan (SWPPP) as required under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit, as discussed in Section IV.H, Hydrology and Water Quality, of this Draft EIR. As part of the SWPPP, the Project would implement best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during

operation, the Project would include BMPs in accordance with the City's Low Impact Development (LID) Ordinance to control and treat stormwater runoff. The Project would support Infrastructure and Public Services Chapter Goal 9C and Objective 9.10 to ensure adequate water supply, storage facilities, and delivery systems to serve the needs of existing and future residents and businesses. Specifically, as discussed in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and confirmed in the Project's Water Supply Assessment provided as Attachment F of Appendix M.1 of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. The Project would support Infrastructure and Public Services Chapter Goal 9A to provide adequate wastewater collection and treatment capacity. Specifically, as discussed in Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board, and the Los Angeles Bureau of Sanitation determined that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. Furthermore, as concluded in Section IV.O.2, the Project would not exceed the available capacity within the wastewater collection infrastructure that would serve the Project. Lastly, as evaluated in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, all waste disposal, including waste collected, transferred and disposed of by the private hauler that would serve the Project Site, would occur in accordance with regulatory requirements in order to ensure safe and efficient handling of solid waste. Therefore, the Project would not conflict with the applicable objectives and policies set forth in the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

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

(2) Mobility Plan 2035

The Project's potential to conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table IV.M-1 of Section IV.M Transportation of this Draft EIR. Specifically, the Project would support Policy 1.6 to provide for safe passage of all modes of travel during times of construction by implementing a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1. As discussed in Section IV.M, Transportation, of this Draft EIR, the Construction Traffic Management Plan would include detour routes for all applicable travel modes, including pedestrian and transit users, and prevent any impediments to the public right-of-way.

The Project would support Policy 2.3 to recognize walking as a form of every trip and ensure high quality pedestrian access by providing connections to pedestrian walkways, publicly accessible promenades, courtyards, and plazas. The Project would also support Policies 2.6 and 2.9, recognizing all modes of travel by providing separate pedestrian entrances and providing on-site bicycle parking and amenities to encourage walking and bicycling. Specifically, primary pedestrian access to the Project Site would be provided from North Broadway and North Spring Street for the South Parcel, and North Broadway for the North Parcel. The Project would include new pedestrian amenities specifically with the addition of new promenades located on the South Parcel increasing accessibility to the Metro A Line Chinatown Station from North Broadway. In addition, the Project would provide 80 short-term and 722 long-term bicycle parking spaces. Furthermore, the Project would encourage transit use by being located in an area with a variety of public transit options provided by Metro, LADOT, SCT, AVTA, and Torrance Transit, as well as the Metro A Line Chinatown Station and Union Station located 400 feet south and 0.65 miles southeast of the Project Site, respectively.²⁰ Therefore, as detailed in Table IV.M-1 of Section IV.M, Transportation, of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted specifically to mitigate or avoid an environmental impact.

(3) Conservation Element

As outlined above, the City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 3 of the Conservation Element recognizes the City's responsibility for identifying and protecting its archaeological and paleontological sites. Project implementation would require the removal of on-site segments of the Zanja Madre, which is a unique archaeological and historical resource, during construction. In addition, if existing off-site segments are adjacent to the Project-related construction activities, it is possible that a portion of the off-site resource could be impacted due to removal of on-site components. However, with implementation of Mitigation Measure NOI-MM-3, which addresses vibration impacts to off-site segments of the Zanja Madre, and Mitigation Measure CUL-MM-1, which requires an on-site construction monitor, as well as implementation of a cultural resources monitoring and treatment plan, potential impacts to archaeological resources would be reduced to less-than-significant levels.

As discussed in Section IV.E, Geology and Soils, of this Draft EIR, if intact paleontological resources are located on-site, ground disturbing activities associated with construction of the Project, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. While no previously recorded

²⁰ Metro and LADOT provide bus stops along North Broadway and SCT, AVTA, and Torrance Transit stop at Union Station's Patsaouras Transit Plaza.

paleontological resources were identified within the Project Site, vertebrate fossil localities were found within three miles of the Project Site within similar geologic units to the Project area. As such, the Project Site is considered to be potentially sensitive for paleontological resources, and, thus, impacts to paleontological resources during construction of the Project would be potentially significant. The Project would implement Mitigation Measure GEO-MM-1 through GEO-MM-3, which include, but are not limited to, the following elements; development of a site-specific Paleontological Resource Mitigation and Treatment Plan by a Qualified Professional Paleontologist (Mitigation Measure GEO-MM-1); a paleontological monitor to be present on site during the cutting of undisturbed deposits of high paleontological-resource potential (Mitigation Measure GEO-MM-2); and to prepare paleontological resources collected during monitoring in a properly equipped fossil-preparation laboratory. With implementation of Mitigation Measure GEO-MM-1 through GEO-MM-3, impacts to paleontological resources or a unique geologic feature would be reduced to less than significant.

Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Buena Vista Street Viaduct, which has been identified as a historical resource, is located adjacent to the northernmost portion of the North Parcel, and a retaining wall and guardrail, assumed to be historic due to the connection with the viaduct, is located directly adjacent to the North Parcel in the public right-of-way. The retaining wall is assumed to not be vibration sensitive due to its status as a component of a major piece of transportation infrastructure. Nonetheless, because it is likely associated with or a part of a historical resource, vibration due to construction could result in a significant impact. Additionally, the Capitol Milling Company, located at 1231 N. Spring Street, is a historic property that has recently undergone substantive renovation, and, although it is a historic structure, it is not currently considered a structure that would be sensitive to vibration related to the Project's construction activities. However, there is a small unreinforced masonry building (believed to have been used for storage at some point) located on the boundary of the Capitol Milling Company property, adjacent to the southwesterly corner of the Project Site that is assumed to be vibration sensitive. With implementation of Mitigation Measure NOI-MM-3, potential indirect impacts to historical resources due to short-term vibration associated with construction activities would be reduced to less than significant.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element adopted specifically to mitigate or avoid an environmental impact.

(4) Housing Element

The Project's potential to conflict with the applicable objectives and policies set forth in the 2021-2029 Housing Element adopted for the purpose of avoiding or mitigating an

environmental effect is discussed in detail in Table 4 of Appendix H of this Draft EIR. As discussed therein, the Project would support Housing Element Goal 1: a city where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs. As previously discussed, the Project would develop 986 residential units, including 200 affordable units. The South Parcel would provide 631 residential units comprised of two live-work units, 106 studio units, 293 one-bedroom units, 195 two-bedroom units, and 35 three-bedroom units. The North Parcel would provide 355 residential units comprised of five live-work units, 38 studio units, 175 one-bedroom units, 112 two-bedroom units, and 25 three-bedroom units. These new residential uses would be located in close proximity to transit. As such, the Project would help the City meet its SCAG RHNA-identified share of regional housing needs assessment.

The Project would contribute housing which creates healthy, livable, sustainable, and resilient communities (i.e., Housing Element Goal 3 and the associated objectives and policies) by developing high-density multi-family housing, commercial, and open space uses in a single mixed-use development with a set of uses that complement one another. The Project would also provide pedestrian-friendly design features, such as new street trees featuring decorative lighting, enhanced sidewalk paving, short-term bicycle parking, outdoor dining and seating areas, landscaping, and a signalized crosswalk across North Broadway at the northeastern tip of the Project Site. At the same time, the Project would complement the surrounding neighborhood by providing housing near employment opportunities and transit; incorporating environmental sustainability features, including energy conservation features; and implementing a TDM Program that would reduce VMT and associated air quality and GHG emissions. As such, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Housing Element adopted specifically to mitigate or avoid an environmental impact.

(5) Health and Wellness Element

The Health and Wellness Element includes the goal to promote a healthy built environment by encouraging the design of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials, and universal accessibility using existing tools, practices, and programs. The Project would support this goal as it would be designed to support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. Both in compliance with and, in some cases, in exceedance of Code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to, Energy Star appliances; continuous insulation and high-performance glazing to minimize heating and cooling loads; ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code;

weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. The Project would also incorporate numerous on-site common and private open space areas. Specifically, the Project would provide a total of approximately 132,949 square feet of open space within the Project Site of which approximately 45,377 square feet would be publicly accessible, privately operated and maintained. Primary pedestrian access to the Project Site would be from North Broadway and North Spring Street for the South Parcel, and North Broadway for the North Parcel. The Project would include new pedestrian amenities specifically with the addition of new promenades located on the South Parcel increasing accessibility to the Metro A Line Chinatown Station directly from North Broadway and would also encourage walkability and promote health by providing a signalized crosswalk across North Broadway at the northeastern tip of the Project Site to create a connection to the Portola Trail leading to the adjacent Elysian Park.

The Health and Wellness Element also includes a policy to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health. As previously discussed, the Project Site is served by a variety of public transit options provided by Metro, LADOT, SCT, AVTA, and Torrance Transit.²¹ The Project Site is also served by the Metro A Line Chinatown Station, located approximately 400 feet south of the Project Site, and Union Station, located approximately 0.65 miles southeast of the Project Site. In addition, the Project would provide 80 short-term and 722 long-term bicycle parking spaces. The Project would also provide preferential parking for carpools and low-emitting and zero-emission vehicles (ZEVs). Further, the Project would also comply with applicable City and CALGreen Code charging requirements, which includes the provision of at least 40 percent of overall residential parking spaces provided on the Project Site that are capable of supporting future electric vehicle supply equipment (EVSE) with 10 percent of the overall residential spaces equipped with EVSE to create electric vehicle (EV) charging stations and 30 percent of overall non-residential parking spaces provided on the Project Site that are capable of supporting future EVSE and 20 percent of the overall non-residential spaces equipped with EVSE to create EV charging stations. Provisions of the EVSE and EV charging stations would help to facilitate and encourage use of alternative fueled vehicles, which would serve to reduce air pollution and improve health. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

²¹ *Metro and LADOT provide bus stops along North Broadway and SCT, AVTA, Torrance Transit stop at Union Station's Patsaouras Transit Plaza.*

(6) Central City North Community Plan

The Project's potential to conflict with the applicable goals, objectives, and policies set forth in the Central City North Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 5 of Appendix H of this Draft EIR. Specifically, the Project would support Objective 1-1 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. As previously discussed, the Project would provide different housing unit types through the development of 986 residential units, including 200 affordable units. The South Parcel would provide 631 residential units comprised of two live-work units, 106 studio units, 293 one-bedroom units, 195 two-bedroom units, and 35 three-bedroom units. The North Parcel would provide 355 residential units comprised of five live-work units, 38 studio units, 175 one-bedroom units, 112 two-bedroom units, and 25 three-bedroom units. The Project would also not conflict with the Objective 1-2 to locate new housing in a manner which reduces vehicular trips as the Project would provide housing in proximity to public transit, existing jobs, destinations, and other neighborhood services. The Project would further support the Open Space Goal 5 for a community with sufficient open space in balance with development through the provision of a variety of open space areas within the Project Site for both residents and visitors, including a total of approximately 132,949 square feet of open space within the Project Site, of which 45,377 square feet would be publicly accessible but privately operated and maintained. Based on the analysis above, and as detailed in Appendix H of this Draft EIR, the Project would not conflict with the 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 as Light Industrial and is zoned as MR2-1 (Restricted Light Industrial). The MR2 zone corresponds to the Project Site's Light Industrial land use designation. The MR2 zone allows for various industrial and manufacturing uses, as well as uses permitted under the MR1 zone, including commercial manufacturing and limited commercial uses. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District 1. All uses located in the MR2-1 zone and within Height District 1 are restricted to a maximum floor area ratio (FAR) of 1.5 times the property's buildable area. Height District 1 does not impose a vertical height limitation on the Project Site.

As described in Section II, Project Description, of this Draft EIR, the Project includes the development of a mixed-use Project comprised of residential and commercial uses. In total, the Project would include up to approximately 1,926 square feet of floor area with a maximum FAR of 3.29:1. The Project would seek a General Plan Amendment to change the land use designation of the Project Site from Light Industrial to Regional Commercial. Pursuant to LAMC Section 12.32 F, the Project would seek a Zone Change and Height

District Change to change the zoning of the Project Site from MR2-1 to C2-2D. Height District 2 allows a maximum FAR of 6:1. Therefore, with the approval of the requested discretionary actions outlined in Section II, Project Description, of this Draft EIR, the Project would be consistent with the applicable LAMC land use regulations for the Project Site.

LAMC Section 12.21 G requires open space for new developments with six or more dwelling units. Per LAMC Section 12.21 G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms; 125 square feet of open space provided for each residential unit containing three habitable rooms; and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. The Project is required to provide a total of approximately 110,775 square feet of open space. As previously discussed, the Project would provide 132,949 square feet of open space, including 84,872 square feet of residential common open space and 2,700 square feet of private open space. As such, the Project would exceed the applicable open space requirements set forth by the LAMC. Landscaping would be provided in conformance with applicable LAMC Section 12.21 G.2(a)(3) which requires one 24-inch box tree for every four dwelling units proposed on site. Overall, the Project would provide 322 new trees (110 street trees and 212 on-site), consisting of coast live oak (*Quercus agrifolia*) street trees, and on-site trees, including, but not limited to, desert willow (*Chilopsis linearis*) peppermint tree (*Agonis flexlosa*), and strawberry tree (*Arbutus unedo*). Therefore, the Project would be consistent with the LAMC as related to open space and landscaping.

The Project would be required to provide a total of approximately 1,476 vehicular parking spaces in compliance with the LAMC. As discussed in Section II, Project Description, of this Draft EIR, parking for the South Parcel would be located within a three-level partial subterranean garage and would provide up to 931 vehicle parking spaces. Parking for the North Parcel would be located within a three-level partial subterranean garage and provide up to 546 vehicle parking spaces, comprising 525 residential parking spaces and 21 commercial parking spaces. Overall, the Project would provide up to 1,477 vehicle parking spaces, comprising 1,404 residential parking spaces and 73 commercial parking spaces. Furthermore, the Project would provide 80 short-term and 722 long-term bicycle parking spaces in accordance with LAMC Section 12.21 A.16(a)(2), for a total of 802 bicycle parking spaces.

Based on the above, the Project would not conflict with the applicable provisions of the LAMC. As such, the Project would not cause a significant environmental impact due to conflict with the applicable provisions of the LAMC adopted for the purpose of avoiding or mitigating an environmental effect.

(iii) Citywide Design Guidelines

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

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

Primary pedestrian access to the Project Site would be from North Broadway and North Spring Street for the South Parcel, and North Broadway for the North Parcel. The Project would include new pedestrian amenities specifically with the addition of new promenades located on the South Parcel increasing accessibility to the Metro A Line Chinatown Station from North Broadway and a new signalized crosswalk from the North Parcel to Elysian Park. The Project would increase pedestrian activity through a combination of activating ground floor commercial uses, including seven live-work units, promenades, public open space amenities, and landscape improvements. An abundance of shade trees, overhangs, and landscaped trellis areas would be integrated throughout the Project Site to provide respite shade areas and create a pedestrian scale. Furthermore, the Project would provide sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings, which would enhance pedestrian safety. Therefore, the Project would not conflict with Citywide Design Guideline 1.

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

Vehicular access to the Project Site would be provided by one driveway on the South Parcel from North Broadway, three driveways on the North Parcel from North Broadway, and one driveway on the South Parcel via existing access easements from North Spring Street located beneath the elevated Metro A Line tracks. All vehicular access points would be separate from the pedestrian access points. Therefore, the Project would not conflict with Citywide Design Guideline 2.

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

The Project would provide 110 new street trees along the frontages of the Project Site consisting of coast live oak street trees, which would enhance the streetscape and improve the pedestrian experience. The Project would also include a Central Greenspace in the central portion of the Project Site to connect the North Parcel and the South Parcel, which would be vegetated with native trees and understory vegetation. While the sloped area of

the Central Greenspace would be inaccessible to pedestrians due to steep southeast facing slopes, the Central Greenspace would enhance the streetscape along North Broadway through the planting of new street trees. On the South Parcel, at the podium level and Building 2, restaurant and retail uses, such as a café and outdoor dining areas, would be located on the ground floor along North Broadway. Additionally, public open space areas, including garden plazas and terraces, a small outdoor amphitheater, amenity gardens, seating areas, meditation spaces, and a water feature, would serve as activating open space for the residents and visitors. The South Parcel would also include new promenades and walkways increasing accessibility to the Metro A Line Chinatown Station from North Broadway. On the North Parcel, located within the Retail Block Building and podium, commercial uses and open space would create an activating environment encouraging pedestrians and visitors to the Project Site through uses, including public shopping gardens, garden dining terraces, and garden plazas and kiosks. The North Parcel would also include seating areas, overlook areas along the southern perimeter of the Parcel to the Los Angeles State Historic Park, and meditation gardens. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale. Therefore, the Project would not conflict with Citywide Design Guideline 3.

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

The Project Site is located within an urbanized area and is surrounded by various residential, commercial, retail, restaurant, office, warehouse, and industrial uses. The Project would introduce uses similar to and compatible with the mix of land uses surrounding the Project Site and would incorporate design elements that would enhance the quality of the visual environment and complement its surroundings. Specifically, the Project would transform a primarily undeveloped Project Site into a modernized development providing a mix of high-quality residential and commercial uses with public and private open space amenities and landscaping. The buildings would be designed to create passive and active open space areas for both residents and visitors to utilize throughout the Project Site and to take advantage of the views of Downtown Los Angeles, as well as the LASHP and the surrounding area. The proposed architecture would reflect the industrial character of the area by utilizing cast-in-place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Building massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North Parcel and the South Parcel. A range of building heights would be provided that would reflect the diversity of building heights within the general Project vicinity. Overall, the Project would be compatible with the general urban characteristics of the surrounding neighborhood, and as such, would recognize and respect the surrounding context. Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a Clear and Coherent Architectural Idea.

As previously discussed, the Project would transform an existing primarily undeveloped Project Site into a modernized development, providing a mix of high-quality residential and commercial uses with public and private open space amenities. The Project Site spans over 0.6 miles along the North Broadway street frontage and would increase pedestrian activity through a combination of activating ground floor commercial uses, including seven live-work units, new street trees, promenades, public open space amenities, and landscape improvements. All ground floor uses would be designed to maximize the visual connection to the street by providing floor to ceiling windows with non-reflective glass coatings. Buildings would be designed to create passive and active open space areas for both residents and visitors to utilize throughout the Project Site and to take advantage of the views of Downtown Los Angeles, as well as the LASHP and the surrounding area. Rooftop terraces with pool decks would provide open space amenities for residents while outdoor ground-level hardscape areas and planted areas, including promenades, seating areas, courtyards, and plazas, would be publicly accessible and promote pedestrian activation and walkability at the street level. An abundance of shade trees, overhangs, and landscaped trellis areas would be integrated throughout the Project Site to provide respite shade areas and create a pedestrian scale. The proposed architecture would reflect the industrial character of the area by utilizing cast-in-place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Variations in the textures, colors, and sizes of these materials would allow for a unified design that links the overall Project, while differentiating individual buildings. Building massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North Parcel and the South Parcel. All of these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea. Therefore, the Project would not conflict with Citywide Design Guideline 5.

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

As previously discussed, the Project would include a total of approximately 132,949 square feet of open space within the Project Site, of which approximately 45,377 square feet would be publicly accessible, privately operated and maintained. On the South Parcel, the ground level outdoor open space would be comprised of outdoor fitness areas, such as the hill climb area, courtyards, promenades, seating areas, and a small, terraced amphitheater seating area. On the North Parcel, the ground level outdoor open space would be comprised of a garden dining terrace, public shopping gardens, public garden plaza and kiosks, landscape trellis, promenades, and associated raised planters and seating. The Project would provide 110 new street trees along the frontages of the Project Site consisting of coast live oak street trees, which would enhance the streetscape and improve the pedestrian experience. Furthermore, an abundance of shade trees, overhangs, and landscaped trellis

areas would be integrated throughout the Project Site to provide respite shade areas and create a pedestrian scale. The Project would also increase pedestrian activity through a combination of activating ground floor uses, promenades, public open space amenities, and a new signalized crosswalk, and landscape improvements. Overall, the Project's proposed landscaping and publicly accessible open space amenities would support community building and provide an inviting comfortable user experience. Therefore, the Project would not conflict with Citywide Design Guideline 6.

Guideline 7: Carefully Arrange Design Elements and Uses to Protect Site Users.

The Project would be implemented within the existing boundaries of the Project Site and would not introduce new features that would pose hazards to site users. In addition, all vehicular access points would be separate from the pedestrian access points to enhance pedestrian safety. Furthermore, as discussed in Section IV.L.2, Public Services—Police Protection, of this Draft EIR, pursuant to Project Design Feature POL-PDF-1, the Project Applicant and/or its construction contractor would implement temporary security measures, including security barriers and fencing, low-level security lighting, locked entry, and regular daily and multiple security patrols during non-construction hours. Pursuant to Project Design Feature POL-PDF-2, the Project will implement a 24-hour/seven-day security plan incorporating on-site security staff; security cameras; adequate lighting of parking facilities, elevators, pedestrian walkways, building entries, open spaces and lobbies to reduce areas of concealment; design of public spaces to be easily patrolled and accessed by safety personnel; and design of entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Therefore, the Project is designed to protect site users, and, as such, the Project would not conflict with Citywide Design Guideline 7.

Guideline 8: Protect the Site's Natural Resources and Features.

The Project Site is located in an urbanized area and is partially developed, with portions of the Project Site currently used for vehicle and equipment storage and parking. The Project Site contains limited vegetation, however, no existing natural habitat, waterways, or other natural areas exist on-site. The Project Site includes 20 existing on-site trees, consisting of Canary Island date palm, Mexican fan palm, and desert fan palm and three street trees consisting of jacaranda trees, none of which are protected under the City's Protected Tree and Shrubs Ordinance (Ordinance No. 186,873). As part of the Project, the 20 existing on-site trees and the three existing street trees would be removed. Landscaping would be provided in conformance with applicable provisions of LAMC Section 12.21 G.2(a)(3), which require one 24-inch box tree for every four dwelling units proposed on site. Overall, the Project would provide 322 new trees (110 street trees and 212 on-site) consisting of coast live oak street trees, and on-site trees, including, but not limited to, desert willow, peppermint tree, and strawberry tree. Furthermore, the Project would not encroach onto the

existing Los Angeles State Historic Park, which is a designated open space area. Therefore, the Project would not conflict with Citywide Design Guideline 8.

Guideline 9: Configure the Site Layout, Building Massing and Orientation to Lower Energy Demand and Increase the Comfort and Well-Being of Users.

The Project would provide outdoor ground-level hardscape areas and planted areas, including promenades, seating areas, courtyards, and plazas, which together would maximize user access to air and natural light. Furthermore, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. Both in compliance with and, in some cases, in exceedance of Code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to, Energy Star appliances; continuous insulation and high-performance glazing to minimize heating and cooling loads; ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. These features would reduce energy and water usage and waste and, thereby, potentially reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would also incorporate sustainability features for alternative, low-carbon modes of transportation, such as EV charging infrastructure and bicycle parking spaces. Accordingly, the proposed site layout, building massing, and orientation would lower energy demand while increasing the comfort and well-being of users. Therefore, the Project would not conflict with Citywide Design Guideline 9.

Guideline 10: Enhance Green Features to Increase Opportunities to Capture Stormwater and Promote Habitat.

As discussed in Section IV.H, Hydrology and Water Quality, of this Draft EIR, the Project would include BMPs in accordance with the City's LID Ordinance to control and treat stormwater runoff. Specifically, the Project would implement a stormwater capture and use system, which would include cisterns that would be sized to hold the design capture volume. Refer to Section IV.H, Hydrology and Water Quality, of this Draft EIR for a full discussion of the proposed BMPs. Furthermore, the Project includes substantial landscaped areas as well as 212 new trees on site and 110 street trees that would capture groundwater and promote habitat. Therefore, the Project would not conflict with Citywide Design Guideline 10.

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. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, land use impacts do not vary substantially over the course of relatively short time frames (i.e., the 20-year term of the Development Agreement). Therefore, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, a total of 25 related projects have been identified in the vicinity of the Project Site. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office, industrial, studio and retail uses, as well as mixed-use developments incorporating some or all of these elements. The related projects generally consist of infill development and redevelopment of existing uses, which are encouraged by the land use policies for the Project Site vicinity. Furthermore, the related projects and the Project would increase employment opportunities in the Project Site vicinity, concentrate development near public transit, provide needed housing and amenities, and activate the surrounding area, consistent with local and regional

goals and objectives. As with the Project, the related projects would be required to comply with applicable land use policies and regulations through review by regulatory agencies and would be subject to CEQA review. **Therefore, overall cumulative impacts related to conflicts with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.**

(2) Mitigation Measures

Cumulative impacts 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.