

IV. Environmental Impact Analysis

F. 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 physically divide an established community and whether the Project would conflict with any 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. Specifically, Section IV.A, *Air Quality*, addresses relevant air quality plans and policies; Section IV.E, *Greenhouse Gas Emissions*, discusses relevant plans and policies to reduce greenhouse gas emissions; Section IV. H, *Population and Housing*, evaluates Project consistency with the 2020-2045 RTP/SCS and Regional Housing Need Assessment; and Section IV.J, *Transportation*, discusses consistency with transportation plans.

2. Environmental Setting

a) Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- Senate Bill 743
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Central City Community Plan
- Los Angeles Municipal Code
- Central Industrial Redevelopment Plan
- Citywide Design Guidelines
- Industrial Land Use Policy

(a) California Government Code Section 65302

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

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32's greenhouse gas (GHG) emission reduction goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of GHG emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations 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

Senate Bill (SB) 743, codified within PRC Section 21099 et. seq., states that "Aesthetic (...) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (PRC Section 21099(d)(1)). If a project meets these conditions, aesthetic impacts associated with the project would not be considered significant. In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and light and glare) as outlined in the California Environmental Quality Act (CEQA) Guidelines Appendix G. However, ZI No. 2452 does not limit the ability of the City of Los Angeles to regulate or study aesthetic-related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code, or the City's General Plan, including specific plans.

Evaluation of a project's physical impacts associated with aesthetics is not required for an exempt project, such as this Project, and is provided for informational purposes only. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or

cultural resources. Such impacts are evaluated pursuant to CEQA in Section IV.2, *Cultural Resources*, of this Draft EIR.

Pertinent definitions applicable to PRC Section 21099(a) and the Project include:

- “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 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 adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.
- “Employment center project” means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.
- “Major transit stop” is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Projects that meet the criteria set forth in PRC Section 21099(d), are exempt from findings of significance related to aesthetic impacts, including view, visual quality, and light and glare impacts as described in the CEQA Guidelines Appendix G questions used by the City as thresholds of significance related to aesthetics. The Project meets the criteria for exemption in that the Project Site is located in an urban area that has been previously developed as required for an “infill site”; all of the perimeter of the Project Site is located within 0.5 mile of a major transit stop (the existing Expo Rail Station for Culver City); and the Project would qualify as an “employment center project” because the existing zoning currently allows commercial uses within an existing Transit Priority Area (TPA), as discussed below. In the City of Los Angeles SB 743 is implemented through ZI 2452.

(2) Regional

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

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections

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

(3) Local

(a) *City of Los Angeles General Plan*

The City of Los Angeles General Plan (General Plan)², 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,³ 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.

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

² 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 1, 2022.

³ 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).

(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.

(a) Land Use Chapter

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

(b) Housing Chapter

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

- Concentrating opportunities for new development in the City's Neighborhood Districts and in Community Centers, Regional Centers, and the Downtown Center, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards located near existing or planned major transit facilities and areas characterized by low-intensity or marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and
- Focusing mixed uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

(c) 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.⁴ 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.

(d) 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 imperative 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.

(e) Economic Development Chapter

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

⁴ City of Los Angeles General Plan Framework, page 5-1, et. seq.

development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

(f) 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.

(g) Infrastructure and Public Services Chapter

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

(ii) *Mobility Plan 2035*

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

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

The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

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

(iii) Conservation Element

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

(iv) Housing Element

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

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

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

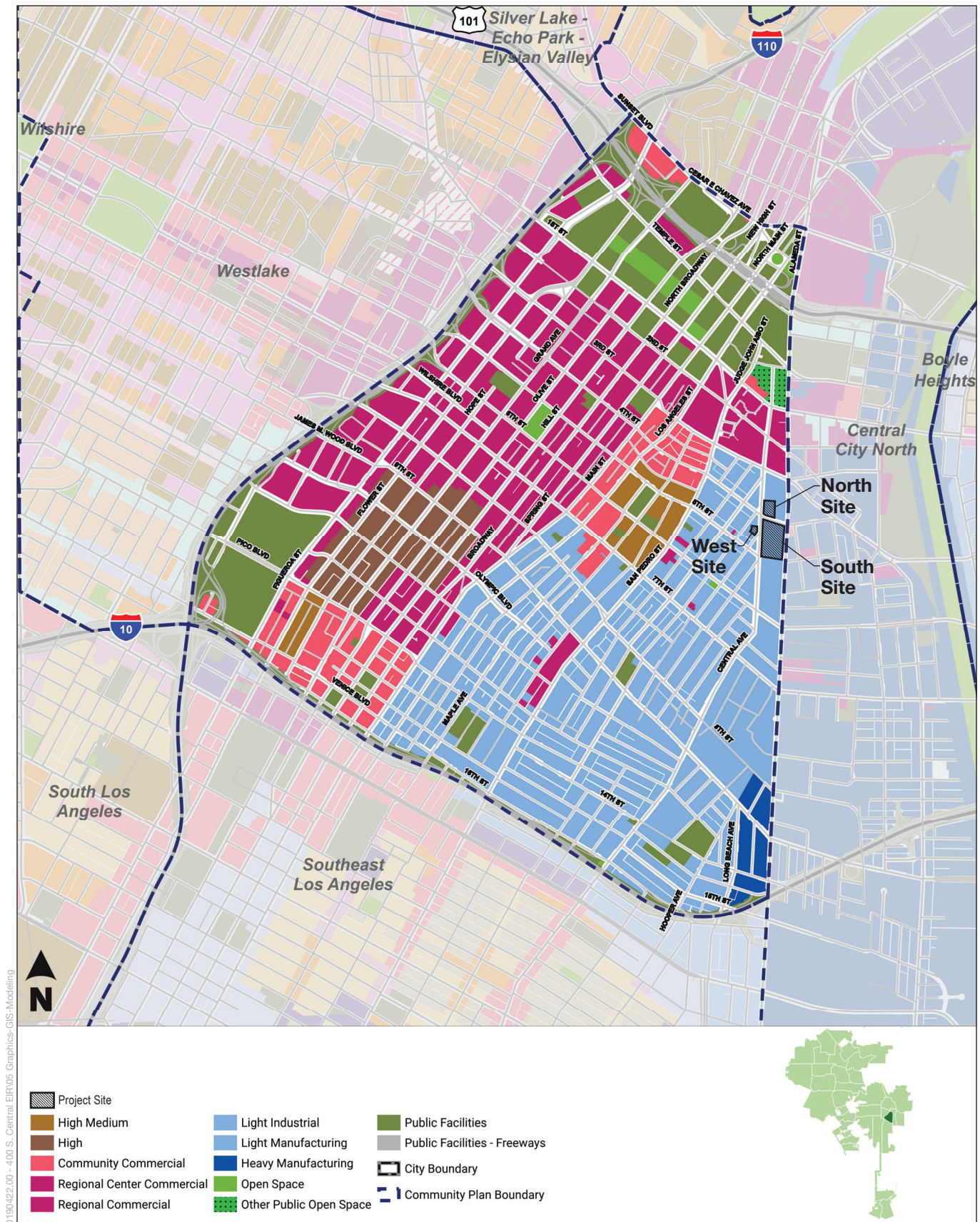
The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. Through a new focus on public health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

This General Plan Element includes 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 which call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(b) *Central City Community Plan*

The City's 2016 Central City Community Plan (Central City Community Plan), which covers the area south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (Interstate 110) and west of Alameda Street, is the land use element of the General Plan applicable to the Central City East, in which the Project Site is located. The Central City Community Plan implements the General Plan Framework and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. The Central City Community Plan's General Land Use Map is shown in **Figure IV.F-1, Central City Community Plan Land Use Designations**, below. Figure IV.F-1 shows the boundaries of the Community Plan area and the land use designations in the Project vicinity.



SOURCE: City of Los Angeles, 2020

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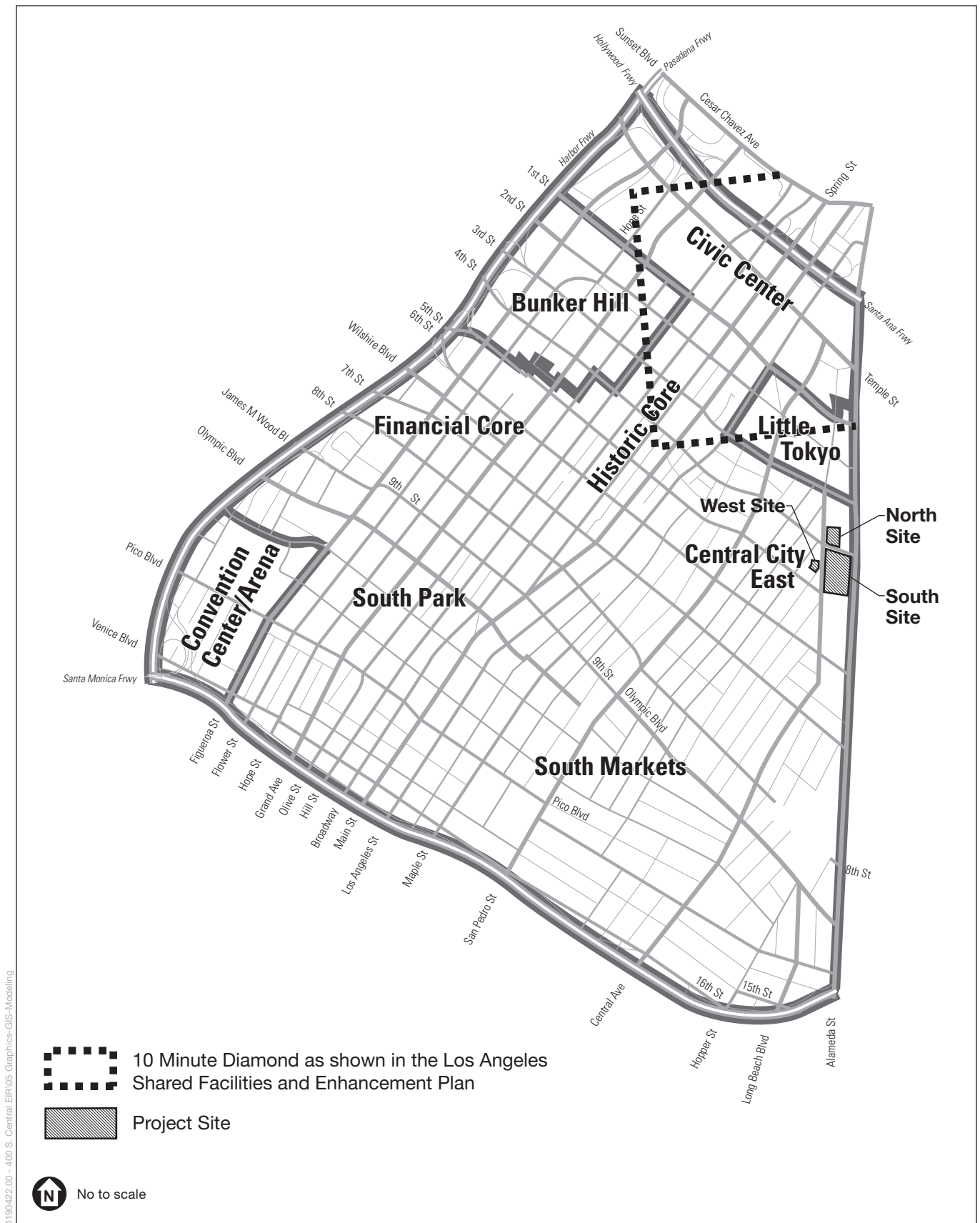
Figure IV.F-1
Central City Community Plan Land Use Designations

The Central City area is the historic, political, social, governmental, and economic center of the City of Los Angeles. Major rail networks and six major freeways converge and interconnect in this plan area. In the past fifteen years, a number of public spaces, which include public art, have been built. Public art has become a major focal point of development activity in the financial district and other locations. City policy related to public art was the catalyst for this era of creative interactive public spaces. Coinciding with this development, an artist's loft colony evolved in the industrial corridor east of Alameda Street adjacent to the Central City community.

The physical relationship of the Project Site to the Central City Community Plan's Neighborhoods and Districts is illustrated in **Figure IV.F-2, Central City Community Plan Neighborhoods and Districts**. As shown in Figure IV.F-2, the Project Site is located within the Central City East Sector of the Central City Community Plan. The Central City East area, which provides jobs for approximately 20,000 people, is characterized by wholesale and warehousing uses including produce, fish and food processing, the Flower Market, an emerging toy import-export industry, and a mixture of other industrial and commercial activities. Land Use and zoning designations in the Project vicinity are shown in **Figure IV.F-3, Project Site and Surrounding Area Zoning**.

As shown in Figure IV.F-3, the Project Site is designated as "Light Manufacturing," and is located amidst an area of similarly zoned industrial uses. The following objectives and policies would be applicable to the Project.

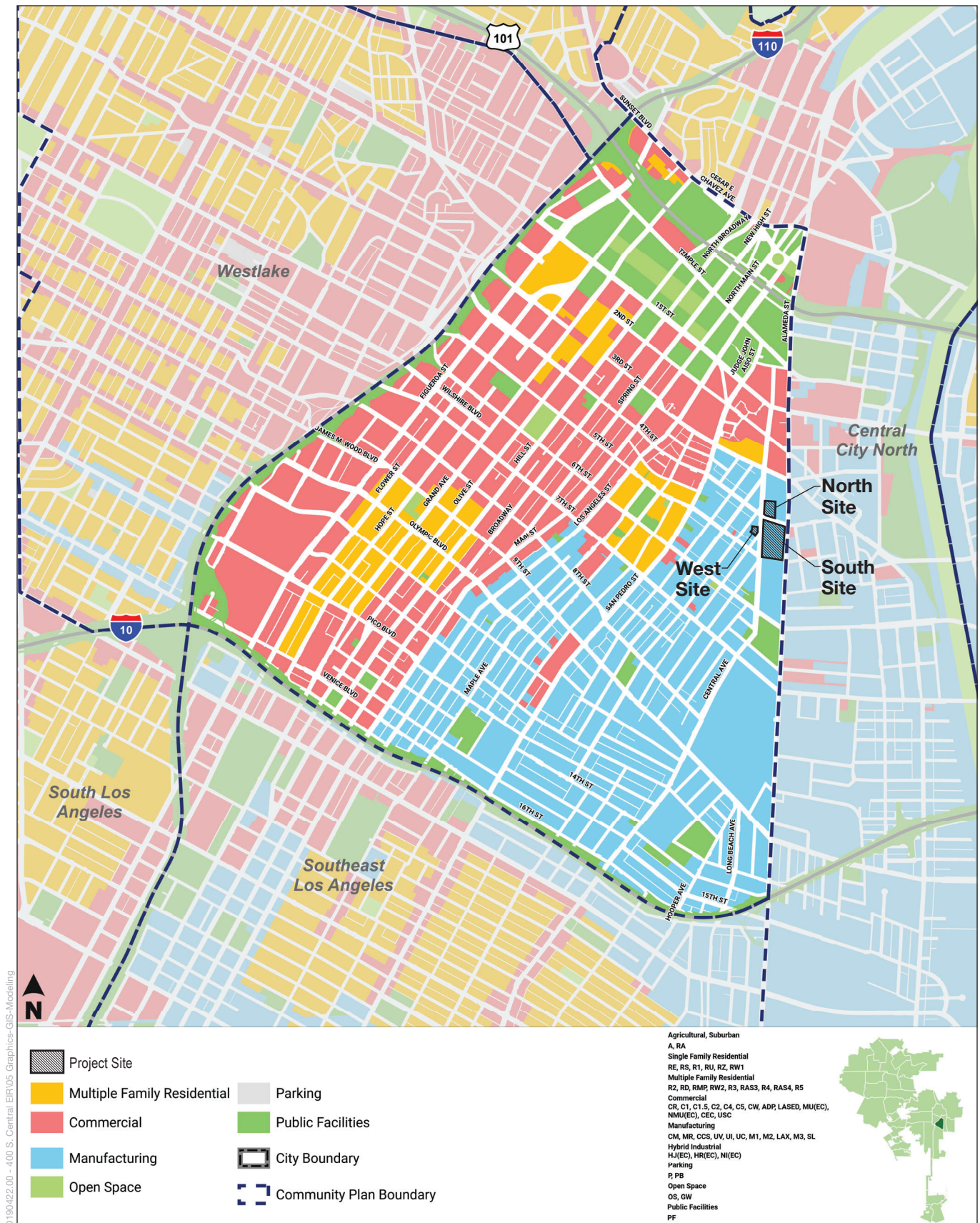
- Objective 1-2 is to increase the range of housing choices available to Downtown employees and Policy 1-2.1 is to promote the development of neighborhood work/live housing.
- Objective 1-3 is to foster residential development which can accommodate a full range of incomes and Policy 1-3.1 is to encourage a cluster neighborhood design comprised of housing and services.
- Objective 2-1 is to improve Central City's competitiveness as a location for offices, business, retail, and industry and Policy 2-1.2 is to maintain a safe, clean, attractive, and lively environment. Objective 2-3 is to promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism. and residents.
- Objective 2-4 is to encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.
- Objective 3-2 of the Community Plan is to study the possibility of developing "artist-in-residence" districts, where appropriate and feasible, in industrial areas where the development of joint live/work units would continue to improve the jobs/housing ratio, respond to market demands, complement surrounding uses and maintain and enhance the viability of industrial lands as the space needs of manufacturers evolve.



SOURCE: City of Los Angeles

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Figure IV.F-2
Central City Community Plan Neighborhoods and Districts



SOURCE: City of Los Angeles, 2020

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Figure IV.F-3
Project Site and the Surrounding Area Zoning

Chapter III of Central City Community Plan has further policies regarding government and public facilities, including open space and recreation, police services, and fire services. Although these are primarily addressed to the public sector, some policies require coordination between project developers and the service provider. Chapter IV of the Central City Community Plan provides policies related to transportation and circulation, including freeway access and capacity, transit, and pedestrian circulation and Chapter V of the Central City Community Plan sets forth policies related to urban design.

(c) *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. The North Site is zoned M2-2D-O and the South and West Sites are zoned M2-2D. “M2” indicates Light Industrial and permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The “2D” indicates Height District 2D, which does not limit the height of buildings on these properties, but would limit the FAR to 3:1. The “O” designation indicates that the Project Site is located within an oil drilling district where the drilling of oil wells or the production from wells of oil, gas, or other hydrocarbon substances is permitted. As noted above, only the North Site has the “O” zoning designation.

(i) *State Enterprise Zone*

The Project Site is located within the Los Angeles State Enterprise Zone. State Enterprise Zones (EZs), as established under City of Los Angeles Zoning Information (ZI) No. 2129, are geographic areas in which federal, State, and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. EZs may utilize lower parking ratios, as set forth in LAMC Section 12.21 A4(x)(3), for commercial office, retail, restaurant, bar and related uses.

(ii) *Greater Downtown Housing Incentive Area*

The Project Site is located within the Greater Downtown Housing Incentive Area. Established under ZI No. 2385 in September 2007, Ordinance No. 179,076 establishes a floor area bonus for projects that provide a percentage of units for affordable housing. Under ZI No. 2385, the maximum unit per lot area was eliminated, density within the relevant FAR is eliminated, all yard requirements are eliminated, as well as other more restrictive floor area and open space regulations. For all projects within the Greater Downtown Housing Incentive Area, no building permit shall be issued unless the CRA/LA (Department of City Planning) has determined that the project complies with the Urban Design Standards and Guidelines. Floor area bonuses provided in the Greater Downtown Housing Incentive Area include a 35 percent increase in floor area. In order to utilize the Greater Downtown Housing Incentive Area’s incentives, a project must provide 5 percent of the total dwelling units for Very Low-Income households, and (i)10 percent of total units

provided for Low Income households, or (ii) 15 percent of total units provided for Moderate Income households, or (iii) 20 percent of total units provided for Workforce Income households (150 percent of Area Median Income). The Greater Downtown Housing Incentive Area also provides for a reduction in parking for households earning less than 50 percent of the Area Median Income.

(iii) *Adaptive Reuse Ordinance*

The purpose of Adaptive Reuse Ordinance (effective December 2001) is to revitalize the Greater Downtown Los Angeles Area and to implement the General Plan by facilitating the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units or visitor-serving facilities. This is intended to reduce vacant space as well as preserve Downtown Los Angeles' architectural and cultural past. This is also intended to encourage the development of a live/work and residential community in downtown Los Angeles, thus creating a more balanced ratio between housing and jobs in the region's primary employment center. This revitalization would also facilitate the development of a "24-hour city" and encourage mixed commercial and residential uses to improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels and transit services near each other.

(d) *Redevelopment Plan for the Central Industrial Redevelopment Project*

The Redevelopment Plan for the Central Industrial Redevelopment Project (Redevelopment Plan), adopted November 15, 2002 and expiring November 15, 2032, applies to the Project's North and West Sites. The Redevelopment Plan was adopted pursuant to State laws and carried out under the auspices of the Community Redevelopment Agency of Los Angeles (CRA/LA) for the purpose of eliminating blight and deterioration that had been occurring in the downtown Los Angeles area. In 2011, the State approved ABx1-26, which dissolved approximately 400 redevelopment agencies across the State. While the economic development and financial tools of the former CRA/LA are no longer available, the City's existing Redevelopment Project areas remain in effect at this time. In June 2012, the State passed additional legislation related to redevelopment (AB 1484), which allows a city to request that land use related plans and functions of the former redevelopment agency be transferred from the CRA/LA and allow for continued implementation of the City's redevelopment projects. On September 30, 2019, the City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325, transferring the land use authority from the former CRA/LA to the City. The City is now responsible for implementing and enforcing unexpired redevelopment plans and associated development guidelines. As clarified by the CRA/LA in a memorandum dated June 21, 2012, the land use designation for any property in a Project Area⁵ set forth in the Redevelopment Plan Map and the corresponding land use regulations shall defer to and are superseded by the underlying General Plan, Community

⁵ A "Project Area" defined geographic area of the City evaluated by a particular Redevelopment Plan or Redevelopment Project.

Plan, and Zoning Ordinance land use designations and regulations.⁶ The applicable goals of the Redevelopment Plan are the following:

- A high quality of life for those who live and work in the Project Area;
- Elimination of conditions of blight and deterioration with the Project Area. And prevention of the establishment of new blight through the removal of structures, removal of incompatible uses, rehabilitation of deteriorates structures and structures requiring modernization for appropriate use, and redevelopment of underutilized and vacant parcels;
- A healthy industrial environment which generates and attracts new private investment to increase job opportunities, property values and tax revenues;
- A safe and secure environment for businesses, employees, residents and visitors, and which is sustainable by the Central Industrial community as a whole;
- A modern circulation system which is responsive to the needs of semi-trailer and truck movement and loading operations, and the needs of businesses, employees, residents, and visitors;
- Adequate, convenient and safe parking facilities, in on- and off-street locations;
- Accessible businesses, residences and other land uses via public and semi-public transportation that is affordable to employees, residents, and visitors to promote jobs, businesses, and housing opportunities;
- Development and rehabilitation of structures to meet all code requirements of the City of Los Angeles, guided by urban design, land use and development standards that promote compatibility of industrial, commercial, and housing uses and which preserves historic resources in the community;
- Sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability;
- Open space, parks, and cultural, recreational and educational facilities for the enjoyment of employees, residents, and visitors; and
- A project area that projects a positive image to business operators, residents, employees, visitors, and investors.

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which involved challenging the constitutionality of ABX1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld ABX1 26, which, therefore, led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective in February 2012. ABX1 26, however, did not dissolve

⁶ City of Los Angeles: Clarification Regarding Discretionary Land Use Action. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/H14.pdf>. Accessed December 2, 2021.

adopted redevelopment plans. Therefore, the Redevelopment Plan and its requirements for development within the Redevelopment Project Area (Redevelopment Area) are still in effect.

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

(e) *Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the 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.

(f) *Industrial Land Use Policy Project*

In January 2008, the Department of City Planning (DCP) and the CRA/LA presented the findings of the Industrial Land Use Policy (ILUP) Project to the City Planning Commission. The ILUP Project was a two-year study that gathered and analyzed information regarding the viability of the City's industrial districts, particularly those areas experiencing pressure to be converted to residential uses. The result of the two-year effort underscored the appropriateness of the current policy adopted by the City Council and Mayor and contained in the Framework Element and elsewhere in adopted documents and made no change to any policy. The ILUP Project does not establish new land use plans or policies and was never formally presented to the City Council for consideration or adoption. Since the ILUP was never formally adopted by the City Council, the City considers zone changes and General Plan Amendments from industrial designations on a case-by-case basis, as it has historically done.

b) Existing Conditions

(1) On-Site Conditions

(a) On-Site Uses

As discussed in more detail in Chapter II, *Project Description*, of this Draft EIR, the Project Site encompasses six parcels with a total land area of approximately 7.6 acres (333,603 gross sf of lot area, pre-dedication). The parcels that make up the Project Site are clustered across three City blocks and include the following three areas: the 1.35-acre North Site, which is located at the northeast corner of Central Avenue and 4th Street; the 5.98-acre South Site, which is located between Central and Alameda Avenues to the south of 4th Street; and the 0.32-acre West Site, which is located to the west of Central Avenue directly across from the South Site. These locations are illustrated in Figure II-1, *Regional and Local Vicinity Map*, and Figure II-2, *Aerial View of the Project Site and Surrounding Uses*, provided in Chapter II of this Draft EIR.

The Project Site is currently occupied by cold storage facilities that include warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking. The existing buildings on the Project Site total approximately 360,734 sf of floor area. Figure II-3, *Existing On-Site Uses*, in Chapter II of this Draft EIR illustrates the existing buildings and uses on the Project Site. Representative existing condition facilities and features of the Project Site as viewed from the adjacent streets are illustrated in photographs presented in Figure II-4, *Photographs of Existing On-site Buildings and Uses*, in Chapter II of this Draft EIR.

As shown in Figures II-3 and II-4, the North Site is currently developed with a six-story cold storage warehouse building and attached single-story warehouse. The combined floor area of the two buildings is approximately 167,596 sf. There are 20 loading docks on the North Site located along 4th Street and Central Avenue. The SurveyLA Historic Resources Survey Report for the Central City Community Plan area identifies the existing six-story warehouse building built in the early 1900's as an individual resource. The western half of the six-story building has remained in continuous use since it was built in the early 1900s and the Project intends to renovate and adaptively reuse a portion of the structure, if feasible. See Mitigation Measures CULT-MM-1 to CULT-MM-8 in Section IV.B, *Cultural Resources*, of this Draft EIR for a discussion of the mitigation measures pertaining to the potential adaptive reuse or rehabilitation of the West Volume of the six-story cold storage warehouse building located on the North Site.

The South Site is developed with a two-story cold storage building totaling approximately 190,267 sf and a conjoining 2,871 sf, single-story office building, constructed between 1957 and 1959, respectively. The two buildings have a total floor area of approximately 193,138 sf. The South Site also includes 47 loading docks and paved surface parking with approximately 33 spaces that serve the warehouse building.

The West Site provides 39 parking spaces in a fenced, paved surface lot and does not include any buildings. The paved surface lot allows for additional parking for the existing cold storage facilities across Central Avenue on the North and South Sites.

Above ground utility lines are present at the intersection of Central Avenue and 4th Street, and along the south side of 4th Street and the west sides of Central Avenue and Alameda Street adjacent to the Project Site.

(b) On-Site Planning and Zoning

The Project Site is located within the Framework Element's designated Downtown Center, which is defined in as an "international center for finance and trade that serves the population of the five-county metropolitan region." According to the Framework Element, the Downtown Center is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Convention Center. The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high-rise buildings.⁷

The City's ZIMAS website identifies the Project Site's General Plan land use as "Light Manufacturing." The Project is located within the planning boundary of the Central City Community Plan, which identifies the Project Site as "Light Industrial." The Community Plan land use map, however, does not include a "Light Manufacturing" designation per the Zimas and use designation, and as such, the Project Site is, herein, identified as Light Industrial. This designation is consistent with the current M2-2D-O zoning on the North Site and the current M2-2D zoning on the South and West Sites. This zoning permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The "2D" indicates Height District 2D, which does not limit the height of buildings on these properties but limits the FAR to 3:1. The "O" designation indicates that the North Site is located within an oil drilling district where the drilling of oil wells or the production from wells of oil, gas, or other hydrocarbon substances is permitted.

The Project Site is located within a State Enterprise Zone (City of Los Angeles Department of City Planning ZI No. 2374) and the Greater Downtown Housing Incentive Area (City of Los Angeles Department of City Planning ZI No. 2385), which were both established to stimulate local investment. State Enterprise Zones provide business owners within the boundaries with State incentives such as tax credits and deductions for hiring eligible employees, credits for sales and use taxes paid on qualifying machinery and electronic equipment, additional business expense deductions, and credits to lenders for loans made to Enterprise Zone businesses. The Greater Downtown Housing Incentive Area was created to incentivize housing development within the boundaries of the area. (LAMC Section 12.22 A.29.) The Greater Downtown Housing Incentive Area was adopted

⁷ Los Angeles Department of City Planning, General Plan Framework Element, Figure 3-1, Long Range Land Use Diagram Metro, 2003.

with the intent of not only incentivizing the development of additional housing, but to also facilitate the development of affordable and workforce housing within the area.

As discussed above, the North Site and West Site are also located within the boundaries of the Central Industrial Redevelopment Project.

The Project Site is located within a City of Los Angeles TPA in accordance with Los Angeles Department of City Planning ZI No. 2452. ZI No. 2452 allows for exemptions to aesthetics and parking evaluations pursuant to CEQA. Section 21099(d)(1) of the Public Resources Code (PRC), states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a TPA. PRC Section 21099 defines the criteria for an infill site and TPAs. Specifically, "infill site" is defined as a location within an urban area that has been previously developed, or a vacant site "where at least 75 percent of the perimeter of the site adjoins an improved public right-of-way. "TPAs" are defined as areas within 0.5 miles of a major transit stop that is existing or planned. A "major transit stop" is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Under ZI No. 2452, a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than 0.5 mile from the major transit stop.

The Project Site is also located within a SCAG-defined High Quality Transit Area (HQTA) as discussed in the 2020-2045 RTP/SCS.

The Project meets the development requirement of mixed-use residential project on a previously developed "infill" site, and the entire Project Site is located within 0.5 miles of the planned and under-construction Metro Regional Connector Little Tokyo/Arts District Station at 1st Street and Central Avenue to the north of the Project Site. As such, the Project meets the criteria of SB 743 and ZI No. 2452.

(1) Adjacent Land Uses

Locally, the Project Site is in a highly urbanized area and situated on the eastern border of the Central City East District of the Central City Community Plan, which is largely developed with general commercial and manufacturing uses such as wholesale, warehouse, and food processing facilities. Alameda Street, which borders the Project Site to the east, separates the Central City East District and from the Arts District. The Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City's downtown area and has experienced an increased demand for new retail, hotel, creative office, and residential spaces. The Project Site is also situated just south of the Little Tokyo neighborhood, where numerous former warehouse structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses.

Specific to the immediate surrounding area, uses directly north of the North Site include a three-story commercial shopping center (Little Tokyo Market Place). A six-story parking structure and surface parking lot are located directly east of the North Site.

The South Site is located south of 4th Street between Central Avenue and Alameda Street. The North Site and a surface parking lot are located to the north of 4th Street. A mix of one to three-story warehouse/light manufacturing and commercial uses are located east and west of the South Site, across Central Avenue and Alameda Street, respectively. Directly south of the South Site is a low-rise distribution center (Young's Market) and associated parking and loading dock areas.

The West Site is adjacent to low-rise warehouse/light manufacturing and supporting surface parking lots.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to land use and planning 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.

For this analysis, the Appendix G thresholds listed above are relied upon.

b) Methodology

The analysis of potential land use impacts considers the Project's potential inconsistency with applicable plans, policies, and regulations, adopted for the purpose of avoiding or mitigating an environmental effect.

(1) Physically Divide an Established Community

The intent of the analysis is to determine whether existing communities or land uses would be disrupted, divided, or isolated by the Project, with consideration given to the duration of any disruptions. The analysis is based on aerial photographs, mapping and field surveys, in which surrounding uses were identified and characterized. The analysis addresses general land use relationships and urban form based on a comparison of existing land use relationships in the vicinity of the Project Site under existing conditions, at the time the Notice of Preparation was issued, to the conditions that would occur with Project implementation.

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

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, that are applicable to the Project Site and the Project and that have been adopted for the purpose of avoiding or mitigating an environmental effect.

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

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 “an EIR shall identify and focus on the significant effects of the proposed project on the environment.” An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

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

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

Project consistency with applicable policies that have been adopted for the purpose of avoiding or mitigating an environmental effect as set forth in SCAG’s 2020–2045 RTP/SCS, the Framework Element, the Central City Community Plan, and the Central Industrial District Redevelopment Plan are provided in tables contained in Appendix F, *Land Use Plans and Policies: Project Consistency Tables*, of this Draft EIR. The results and determination of whether the Project would cause a significant environmental impact

due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below. To the extent that the Project's potential conflict with a plan, program or policy is analyzed in another section of this Draft EIR, that plan is not further discussed in this Land Use Section. For example, consistency with SCAQMD's Air Quality Management Plan (AQMP) is analyzed in Section IV.A, *Air Quality*, and transportation plans are analyzed in Section IV.J, *Transportation*, of this Draft EIR.

c) Project Design Features

No Project Design Features related to land use are required or provided.

d) Analysis of Project Impacts

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

(1) Impact Analysis

As discussed in the Initial Study contained in Appendix A of this Draft EIR, the Project would be constructed entirely within the bounds of the Project Site and contained within the existing developed blocks bounded by 4th Street, Central Avenue, Alameda Avenue and Gladys Avenue all of which have existing public rights-of-way. The Project would be an infill project providing uses in keeping with the development of recent mixed-use projects in the surrounding area. The Project would not constitute a physical barrier separating an established community. **Thus, a less-than-significant impact would occur with respect to Threshold (a). No further analysis is required.**

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

(1) Impact Analysis

Project development would be subject to various land use plans and policies as well as development standards in the LAMC's Planning and Zoning Code. Project consistency with the applicable regional and local plans, policies, guidance, and regulations are addressed below and include SCAG's 2020-2045 RTP/SCS, the City's Framework Element, Open Space Element, Conservation Element, Housing Element, and Health and Wellness Element. The evaluation also includes the Citywide Design Guidelines, Central City Community Plan, the Central Industrial District Redevelopment Plan (North and West Sites only), the Adaptive Reuse Ordinance and the Los Angeles Municipal Code.

Other plans that contain policies addressing environmental effects are discussed in other sections of this Draft EIR. Specifically, Project consistency with the AQMP is analyzed in Section IV.A, *Air Quality*, and SB 375 and SCAG's RTP/SCS are discussed in

Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR. The Project's relationship to the City's Transportation Element (Mobility Plan 2035) is evaluated in Section IV.J, *Transportation*, of this Draft EIR.

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

As evaluated in detail in **Table LU-1**, Consistency of the Project with Applicable Goals and Strategies of the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Intended to Avoid or Mitigation and Environmental Effect (Appendix F of this Draft EIR), the Project would not conflict with applicable strategies of the 2020-2045 RTP/SCS. In summary, the Project would not conflict with policies to focus growth near destinations and mobility options. The Project would represent an intensification of development on an underutilized site within a HQTa within proximity of the Regional Connector Little Tokyo/Arts District station, the DASH Route A, and multiple bus lines and bicycle facilities and, thus, would not conflict with policies that emphasize land use patterns that facilitate multimodal access to work, educational and other destinations; policies that plan for growth near transit investments; policies that support implementation of first/last mile strategies; and policies that prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods. In addition, the Project would implement a transportation demand management (TDM) plan that would not conflict with strategies that reduce the reliance on, and number of, solo car trips.

At a minimum, the Project's buildings will be designed to meet the equivalent standards for United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certification through proven and effective design strategies. The Project may seek certification as an Environmental Leadership Development Project (ELDP) under the Jobs and Economic Improvement Through Environmental Leadership Act (PRC, Section 21178 et seq.). Sustainable elements that have been included into the Project are described below.

The Project's buildings, including commercial kitchen uses, heating, and cooling would be all-electric with no natural gas building infrastructure. The Project would comply with the City's Electric Vehicle Parking Ordinance, which requires 30 percent of the Project's total parking spaces to be designated as EV spaces capable of supporting future EVSE, and 10 percent of the total number of spaces to be EVCS (Ordinance No. 186,485). Further, the Project is required to provide on-site short and long-term bicycle parking in various areas with consideration of its integration throughout the Project and surrounding roadway network.

The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment. The Project will investigate the use of

local low-carbon materials and Environmental Product Declaration (EPDs) to promote the City's green-material economy by using the "Buy Clean California Act" (AB 262) as a reference and resource.

The Project will use tree landscaping to provide passive solar shading and use cool roof/pavement coatings to reduce the urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. The Project will focus on occupant wellness by incorporating healthy materials with low-volatile organic compounds (VOCs), abundant daylight, and accessible thermal comfort control to prevent sick building syndrome. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and dedicated on-site recycling areas.

The Project would collect, filter, and store surface water runoff in accordance with the City's Low Impact Development (LID) Ordinance to reclaim and improve the quality of stormwater entering the City's storm drainage system. Therefore, the Project would not conflict with policies to promote more resource efficient development focused on conservation, recycling and reclamation.

In addition, the Project would include 90,113 square feet of publicly-accessible open space, including plazas and pocket parks within the North and South Sites, and paseos passing between Central Avenue and Alameda Street. In addition, although the Project does not change access to public parks, it would provide open space accessible to the public and, thus, increase park opportunities in the area. The Project would not conflict with policies to identify ways to improve access to park space. Therefore, as evaluated in detail in Table LU-1 and summarized, above, the Project would not conflict with policies of the 2020-4045 RTP/SCS adopted to avoid or mitigate an environmental effect.

(b) City of Los Angeles General Plan Framework Element

As evaluated in detail in **Table LU-2, Comparison of the Project to Applicable Policies of the City of Los Angeles General Plan Framework Element Intended to Avoid or Mitigate an Environmental Effect** (Appendix F of this Draft EIR), the Project would not conflict with applicable policies of the Framework Element nor any of its applicable chapters. In summary, development of the Project Site would not conflict with policies of the Land Use Chapter related to the spatial distribution of development to facilitate a reduction of vehicle trips, vehicle miles traveled, and air pollution in that the Project is located within a SCAG-defined HQT and City-defined TPA. The TPA encourages redevelopment and growth near transit facilities to reduce reliance on the automobile. The Project would be located 0.4 mile of the Metro Little Tokyo-Arts District Connector Station, and in proximity to the DASH and multiple bus lines, and near the bike lanes on 5th Avenue that provide direct access to the Los Angeles Civic Center. As such, the Project would not conflict with policies that provide for land use patterns that emphasize transit, and pedestrian/bicycle access.

The Project's ten multi-story buildings would be consistent with the multi-story, mixed use character of the Project Site's location within the designated Downtown Center and the

adjacent Little Tokyo/Arts District neighborhoods and would not encroach into any existing residential neighborhoods. The architectural variety of building design, building heights and architectural treatment, mix of uses, provision of street-to-street paseos, and substantial publicly-accessible, landscaped open space would enhance the character of the Project Site and surrounding commercial/industrial area and, thus, would not conflict with policies that require new development to maintain the prevailing scale and character of the City's stable neighborhoods. The Project would not conflict with policies of the Urban Form and Neighborhood Design Chapter to maintain good visual connections between the adjacent sidewalks and the Project by providing clear glass, ground level windows that allow visibility between sidewalks, publicly-accessible open space areas and building interiors.

The Project would not conflict with policies of the Open Space and Conservation Chapter in that it would be constructed on an existing developed site and would not encroach into the City's natural settings and would contribute to the sustainability of the region's sustainable landscaping that is native or climate-adapted and comply with Title 24 and the City of Los Angeles Green Building Code in building design. Design features would include sustainability features discussed above. Further the Project would plant 408 new trees within 90,113 square feet of publicly-accessible open space, thus, adding a sustainable environment within an area currently largely devoid of such resources. Passive shading provided by trees throughout the Project Site would further reduce solar exposure and reduce cooling energy loads. The Project would collect, filter, and store surface water runoff in accordance with the City's LID Ordinance to reclaim and improve the quality of stormwater entering the City's storm drainage system. Through its stormwater management and filtration system, the Project would not conflict with policies of the Public Facilities and Infrastructure Chapter to minimize flood hazard and to protect and improve water quality. In addition, the Project would provide bicycle parking, encourage cycling, and would not encroach on the area's existing bicycle lanes. Therefore, as evaluated in detail in Table LU-2 and summarized, above, the Project would not conflict with Framework Element policies adopted to avoid or mitigate an environmental effect.

(c) *General Plan Open Space Element*

As evaluated in detail in **Table LU-3, Consistency of the Project with Applicable Goals, Objectives and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate an Environmental Effect** (Appendix F of this Draft EIR), the Project would not conflict with the majority of applicable policies of the Open Space Element. In summary, the Project Site is currently void of any open space areas containing unique natural features, scenic areas, cultural and appropriate historical monuments, with the exception of the existing six-story warehouse building built in the early 1900's on the North Site (715 E. 4th Street), which the SurveyLA Historic Resources Survey Report for the Central City Community Plan area identifies as an individual historic resource. This resource is discussed below.

The Project would incorporate 163,325 sf of usable open space for on-site residents, office workers, and hotel guests. Of this, approximately 105,218 sf would be outdoor and rooftop common open space, approximately 25 percent (a minimum of 26,305 sf) would be landscaped. In addition, the Project would provide approximately 90,113 sf of publicly-accessible open space within a total of 12 individually curated publicly-accessible open space areas. Publicly-accessible uses would consist of paseos, plazas, and private park space accessible to the public. Amenities provided throughout the open space area would include trees, landscape, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). With the Project's proposed opens space areas and features, the Project would contribute to the City's open space resources, including those available for public use.

The six-story brick building on the North Site, referred to as the LACS Building, includes a West Volume and an East Volume. The LACS Building was originally constructed in the early 1900s and is identified by SurveyLA as an individual historical resource. The Project would demolish the East Volume and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 to CULT-MM-8 in Section IV.B, *Cultural Resources*, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 to CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. This impact has been disclosed as significant and unavoidable impact in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR such as construction-related impacts in Section IV.A, *Air Quality*, and Section IV.G, *Noise*.

As shown in Table LU-3, the Project would conflict with one goal and one objective pertaining the conservation of historic resources. However, since the Project would not conflict with other relevant goals, objectives and policies of the Open Space Element, and this impact has been identified as significant and unavoidable in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, the Project would be substantially in conformance with the Open Space Element and, therefore, not in conflict with the Open Space Element causing a significant environmental impact that is not already disclosed in another section of this Draft EIR or considered to be a land use impact.

(d) *General Plan Conservation Element*

As evaluated in detail in **Table LU-4, Consistency of the Project with Applicable Policies of the Conservation Element of the General Plan Intended to Avoid or Mitigate an Environmental Effect** (Appendix F of this Draft EIR), the Project would not conflict with applicable policies of the Conservation Element. In summary, the Project would implement mitigation measures relative to any discovered archaeological or paleontological

resources and thus would not conflict the policy to protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes. The Project would implement a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs), which would not conflict with policies to reduce erosion and protect the watershed. The Project Site, which features a flat topography and existing developed buildings, has limited view vantage points across the existing developed Project Site. As such, the Project would not conflict with policies to protect and reinforce natural and scenic vistas or policies to protect natural landforms. Therefore, as evaluated in detail in Table LU-4 and summarized, above, the Project would not conflict with Conservation Element policies adopted to avoid or mitigate an environmental effect.

(e) *General Plan Housing Element*

CEQA's impact evaluation with respect to housing is to reduce the removal of existing housing and analyze the need for the development of replacement housing elsewhere, the construction of which could result in potentially significant environmental impacts. The goals of the Housing Element are to provide for housing production resulting in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs and to provide sustainable and resilient communities that improve the lives of all City residents. There are not any residential uses on the Project Site; as such, the Project would not result in the removal of any existing housing. In addition, the Project would provide 1,521 residential units within six of the proposed buildings. Six buildings (Buildings 1, 2, 5, 6, 7, and 9) would be mixed-use and one building (Building 10) would be all residential. With the Project's addition of housing at the Project Site, the Project would reduce the need to construct housing elsewhere while meeting the need for additional housing identified in the Housing Element. With respect to CEQA impacts, the provision of housing within the City to meet growing population needs within the existing urban area and would reduce migration and urban sprawl to less urbanized areas. Thus, the Project would reduce commuting distances between residential neighborhoods and areas with high concentrations of jobs. The reduction in commuting distances would ultimately reduce VMT in the region. Because the Project would contribute to the City's housing production, including affordable housing options as well as creating a more sustainable community, the Project would not conflict with the goals of the Housing Element to increase housing within urban Los Angeles. Therefore, the Project would not conflict with Housing Element policies adopted to avoid or mitigate an environmental effect.

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

The Health and Wellness Element provides objectives and implementation programs to elevate health as a priority for the City's future growth and development. In this regard, the Project, which would implement a TDM Program to reduce the number of single occupancy vehicle trips to the Project Site and corresponding VMT, and reduce vehicle emissions, would not conflict with the City's health objectives to reduce air pollution from stationary and mobile sources and to protect human health and welfare and promote improved respiratory health. The Project Site is located within walking distance (0.4 mile)

of the under-construction Metro Regional Connector Little Tokyo/Arts District Station at 1st Street and Central Avenue to the north of the Project Site. The Project would also provide 145 short-term bicycle parking spaces and 595 long-term bicycle parking spaces. The proximity to transit, as well as to the City's downtown's high-density commercial and government districts would allow for walking and biking to and from work. In addition, the Project would include approximately 163,325 sf of Code-required usable open space and approximately 90,113 sf of publicly-accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites that would allow a greater circulation of air throughout the Project Site.

With regard to policies to 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 and policies to improve air quality and decrease air pollution, the Project would not conflict with sustainability policies of the 2020-2045 RTP/SCS, including VMT reduction strategies, increased use of alternative fueled vehicles, and implementation of Project Design Feature GHG-PDF-1 (Green Building Features), including achieving the USGBC LEED Gold Certification to improve building energy efficiency above regulatory requirements. The Project would comply with applicable solar installation regulatory requirements and incorporate healthy materials with low-volatile organic compounds (VOCs), abundant daylight, and accessible thermal comfort control to prevent sick building syndrome.

The Project would promote the Green New Deal's goals increasing renewable energy usage; reduction of per capita water usage; promotion of walking and biking, promotion of educational and recreational uses close to transit; and various recycling and trash diversion goals. The Project would comply with the Los Angeles Green Building Code meeting Title 24 Building Energy Efficiency Standards, such as the use of tree landscaping to providing passive solar shading and use cool roof/pavement coatings to reduce the urban heat island effect. The Project would not conflict with CARB's Climate Change Scoping Plan through an anticipated decline in Project emissions once fully constructed and operational and the Project would meet the State's GHG reduction targets for 2030 and 2050. Refer to Section IV. E, *Greenhouse Gas Emissions*, of this Draft EIR, for further discussion on the Project's consistency with these plans and policies. Therefore, the Project would not conflict with Health and Wellness Element policies adopted to avoid or mitigate an environmental effect.

(g) *Citywide Design Guidelines*

The Citywide Design Guidelines largely focus on the aesthetic characteristics of a development project. However, Guideline 8, which is to protect a site's natural resources and features; Guideline 9, which is to configure the site layout, building massing and orientation to lower energy demand and to increase the comfort and well-being of users; and Guideline 10, which is enhance green features to increase opportunities to capture stormwater and promote habitat are directly related to a project's physical effects on the environment.

With regard to Guideline 8 to protect a site's natural resources and features, the Project Site is fully developed and primarily paved, with no landscaping on the Project Site. On-Site vegetation is limited to 20 fern pines (*Podocarpus* sp.) within the adjacent roadway right-of-way, with ten trees being located on the southern boundary of the North Site (along 4th Street) and ten trees along the eastern boundary of the South Site along Alameda Street. These are not a protected species; however, each of these street trees would be replaced on-site at a ratio of 2:1 by the Project for a total of 40 replacement trees. Overall, the total tree planting for the Project would provide 422 new trees and a minimum of 105,218 sf of outdoor and rooftop common open space, approximately 25 percent of which is required to be landscaped. With the addition of trees and landscaping on a developed urban site now lacking natural resources, the Project would not conflict with objectives of Guideline to protect the site's natural resources and features.

With regard to Guideline 9 to configure the layout to lower energy demand, the Project would be designed to include numerous open plazas and paseos, including the 4th Street Plazas; the two Flex Alleys; the 4th Street Green; the Central Courtyard; the block-to-block sidewalks that comprise the Mews; and the 5th Street Pocket Park. These open spaces and the addition of trees would allow for a free circulation of air (ventilation) and tree shade, which contribute to the natural cooling of the Project and a reduction in HVAC demand. As such, the Project would not conflict with the objectives of Guideline 9.

With regard to Guideline 10 to enhance green features to increase opportunities to capture stormwater and promote habitat, the Project would implement a landscaping program that would use stormwater consistent with City's LID Ordinance. As discussed in the Section 4, Subsection X, *Hydrology and Water Quality*, and Appendix D, *Hydrology and Water Quality Report*, of the Project's Initial Study (see Appendix A of this Draft EIR) the Project Site is approximately 97 percent impervious. At buildout, the Project Site would reduce impervious surfaces. As analyzed in the *Hydrology and Water Quality Report*, the Project would convey stormwater via building roof drains, area drains, surface flow to the proposed BMPs required by the LID Ordinance. The Project would decrease the 50-year peak flow rate from the entire Project Site by 0.58 percent and would improve current conditions by capturing and treating the 85th percentile storm, thus, reducing the peak flow of the stormwater discharged to the public infrastructure. As such, the Project would not conflict with the objectives of Guideline 10 to capture stormwater and promote habitat.

Therefore, the Project would not conflict with Citywide Design Guideline policies adopted to avoid or mitigate an environmental effect.

(h) Central City Community Plan

As evaluated in detail in **Table LU-5, Consistency of the Project with Applicable Policies of the Central City Community Plan Intended to Avoid or Mitigate an Environmental Effect** (Appendix F of this Draft EIR), the Project would not conflict with the majority of applicable policies of the Central City Community Plan. In summary, the Project would provide 90,113 square feet of ground level public open space with streetscape, landscaping, and public art, which would contribute to the overall flow of open space within the local Project

vicinity. The Project's open space design would capitalize on proximity to transit and other cultural resources within the City's Arts District. Therefore, the Project would not conflict with Community Plan policies to encourage traditional and non-traditional sources of open space that provides an air quality benefit.

The Project would incorporate design features to enhance safety around the Project Site, as well as provide private security on the Project Site. As such, the Project would complement the provision of police services and reduce demand of services by the Los Angeles Police Department (LAPD). The Project would incorporate the following security features:

- Access points would be limited and located in areas of high visibility
- Outdoor areas would be exposed to windows and allow for natural surveillance
- Interior and exterior spaces would be well lit with proper signage to direct flow of people and decrease opportunities for crime
- Building access/design would be secured to residential areas (access key cards)
- Building entryways and outdoor plaza areas would be well-lit
- Staff would be trained in safety and sound security policies
- Entrances and exits of the buildings would be monitored and security camera surveillance would be provided
- Trained personnel would provide assistance to residents and visitors with Project Site access

By increasing security and, thus, reducing demand for police services, existing facilities can better support the needs of the Community, while avoiding the construction of new facilities. Therefore, the Project would not conflict with policies to promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime and reduction in calls for police service.

The Project would locate a high intensity development, including 1,521 residential units; 401,101 sf of office uses; 93,100 sf of restaurant/retail uses; and 68 hotel rooms) within downtown Los Angeles, within a designated TPA. This high concentration of development would keep the City's downtown area as a focal point of the regional mobility system and the Project's proximity to the Metro Little Tokyo/Arts District Connector Station and bus lines. The concentration of development, as well as the TDM program to be implemented under the Project would encourage rail connections and use of high occupancy vehicles. Therefore, the Project would not conflict with policies to keep downtown as the focal point of the regional mobility system accommodating internal access and mobility needs as well, which would reduce overall VMT in the region. The Project would provide 90,113 square feet of ground level public open space with streetscape, landscaping, and street-to-street paseos between Central Avenue and Alameda Streets, which would encourage

pedestrian activity and use. The Project would not conflict with policies to accommodate pedestrian open space and use, thus reducing regional VMT.

As discussed above for the General Plan Open Space Element, the Project would demolish the East Volume of the LACS Building and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 to CULT-MM-8 in Section IV.B, *Cultural Resources*, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 to CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. This impact has been disclosed as significant and unavoidable impact in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR such as construction-related impacts in Section IV.A, *Air Quality*, and Section IV.G, *Noise*.

As shown in Table LU-5, the Project would conflict with one objective (Objective 10-2) and one policy (10-2.6) pertaining to the conservation of historic resources. However, since the Project would not conflict with other relevant objectives and policies of the Central City Community Plan, and this impact has been identified as significant and unavoidable in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, the Project would be substantially in conformance with the Central City Community Plan and, therefore, not in conflict with the Central City Community Plan causing a significant environmental impact that is not already disclosed in another section of this Draft EIR or considered to be a land use impact.

(i) *DTLA 2040*

The Downtown Los Angeles Community Plan Update, known as DTLA 2040, is the first community plan to implement the components of Re:code LA, the ongoing rewrite of the City's zoning code. Re:code LA sets forth specific form, function, and use districts to regulate the scale, massing, and height of new buildings. DTLA 2040, which the City Council voted to approve (with amendments) on May 3, 2023, sets the stage for neighborhood growth and development and replaces the Central City Community Plan for the area located south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (Interstate 110) and west of Alameda Street. DTLA 2040 will not become operative until the related implementing ordinances are adopted by the City Council. The implementing ordinances have been referred to the City Attorney to ensure Form and Legality, and will be presented to the City Council for final adoption at a future date. Although the implementing ordinances for DTLA 2040 have not been formally adopted by the City, this subsection provides a general consistency analysis with the draft version of the DTLA 2040 Plan that the City Council voted to approve (with amendments) on May 3, 2023.

The City's Planning Department anticipates that DTLA 2040 will accommodate up to 175,000 residents and 100,000 jobs in the area through 2040, or approximately 20 percent of the city's expected growth to Year 2040.⁸ DTLA 2040, besides changing zoning rules, also introduces a new base-bonus system through which additional floor area rights can be gained through the provision of publicly-accessible open space, on-site affordable housing, or other community-serving features.

The DTLA 2040 Land Use Map designates the North Site and West Site as "Community Center" and the South Site as "Hybrid Industrial." The designated "Arts District" is located to the east of Alameda Street. "Community Center" zones, as applicable to the North and West Sites are DM2 (Moderate Rise Medium 2) and MB4 (Mid-rise Broad 4). The FARs in these zones range from 2:1 FAR (8.5:1 FAR with bonus) to 3:1 FAR (6:1 FAR with bonus). The North and West Sites are associated with use district CX2, which allows for ground floor commercial mixed with a range of residential types.

Goals of DTLA 2040 applicable to the "Community Center" designation include LU GOAL 27 to provide complete neighborhoods that welcome workers and residents, LU GOAL 28 to provide areas with a range to community-scaled commercial establishments and professional offices that offer opportunities for small businesses, LU Goal 29 to provide accessible residential communities for broad range of incomes and household sizes with integrated services and amenities; and LU Goal 30 to provide neighborhoods with an inviting urban form that fosters longstanding communities. Respective policy LU Policy 30.2 seeks to establish connections between common or publicly-accessible open spaces to create a seamless pedestrian realm that extends and builds upon existing corridors, and provides key linkages between districts.

The South Site is designated as "Hybrid Industrial" with a form district of MB4 (Mid-Rise Broad 4). The maximum FAR range is 3:1 (6:1 FAR with bonus). The underlying Use District is IX4, which allows for mixing of production, creative production, variety of employment uses, and affordable housing. Goals of DTLA 2040 applicable to the "Hybrid Industrial" designation include LU GOAL 31 to provide diverse land uses and to welcome new and adaptive reuse sustainable structures that accommodate a range of hybrid industrial and productive activities; LU Goal 32 to provide hybrid industrial paces with space for in-home production, light industrial, and creative activity, and new industries that encourage innovation and bring flexibility and resiliency to the City's economy; LU Goal 33 to provide housing stock that reinforces and complements the productive, entrepreneurial, and creative focus of hybrid industrial areas; and LU Goal 34 to provide hybrid industrial environments with distinct visual and physical features that reflect an industrial legacy. Supporting policies include LU Policy 34.2 to foster the development of durable and flexible buildings that support a range of creative and productive activities and offer live/work opportunities; LU 34.3 to encourage retail and restaurant uses in

⁸ Los Angeles Department of City Planning website. <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed July 2, 2023.

partnership with productive uses to promote extended hours of activity; and LU 3 Policy 34.4 to support walkable neighborhoods with an active and livable street life that is shared by all modes, including pedestrians, cyclists, and transit users.

DTLA 2040 is primarily a guide to the function and scale of future development within the Downtown and, although respective policies would increase pedestrian activity and a mixed of commercial, industrial, and residential uses and, therefore, increase pedestrian activity, hours of active use within the Downtown, and would reduce VMT, the goals and policies, per se, are not specifically intended to reduce or eliminate physical impacts on the environment. The Project's proposed mix of uses within a TPA would be consistent with and allowed under DTLA 2040. With affordable housing development incentives under LAMC Section 11.5.11 (i.e., additional FAR and averaging FAR across the Project Site), the Project's 7.13:1 FAR would be allowed under DTLA 2040. The Project would result in 103 more residential units than allowed under the DTLA 2040's zoning parameters. However, housing is a priority in the City and the comparative eight (8) percent increase is consistent with DTLA 2040 policies related to placing housing near transit facilities. The Project's varied open spaces and plazas that would positively contribute to the walkability of the neighborhood are in line with DTLA 2040 goals and policies related to open space/pedestrian-oriented development. Further, the scale, uses, and features of the Project as a whole would be substantially consistent with the goals of DTLA 2040. Also, as a mixed use project within a TPA, the Project would not conflict with the development policies of DTLA 2040 and would, therefore, not result in a significant impact with respect to this land use plan.

(j) *Central Industrial District Redevelopment Project*

As evaluated in detail in **Table LU-6, Consistency of the Project with Applicable Policies of the Central Industrial District Redevelopment Project Intended to Avoid or Mitigate an Environmental Effect** (Appendix F of this Draft EIR), and summarized below, the Project would not conflict with the majority of the applicable goals of the Central Industrial Redevelopment Project. The applicable goals contained in Section 105 of the Redevelopment Plan include eliminating blight, providing a safe environment, supporting a modern circulation system, development and rehabilitation of structures consistent with all code requirements and preserve historic resources, sustainable development, and provision of open space. As further discussed below, the Project would redevelop the Project Site with a high-quality mix of uses that would eliminate blight, provide a safe environment, improve adjacent streets and sidewalks, be consistent with all code requirements, promote land use and development standards that promote compatibility of uses, include sustainable features, and provide usable open space accessible to the public.

The Project's redevelopment of underutilized parcels and concentration of new development within downtown Los Angeles in proximity to transit, would reduce the need for automobile use and reduce VMT associated with population growth in the region and, thus, promote sustainability. The Project would enhance the safety and security of the Project Site and surrounding area through the presence of residents (occupants of 1,521 on-site residential units), office workers, retail workers and visitors, and hotel visitors and

employees. The Project design would facilitate observation and natural surveillance through common areas, adequate lighting, clear definition of outdoor spaces, good visual connections between the Project's residential, commercial, and surveillance, thus, reducing demand for police services and would, thus, promote safety. The Project anticipates additional street dedications, including six feet along the south side of 4th Street adjacent to the Project Site and 10 feet along the west side of Alameda Street in accordance with the Mobility Plan. Therefore, the Project would not conflict with policies to modernize the circulation system which is responsive to the needs of semi-trailer and truck movement and loading operations, and the needs of businesses, employees, residents, and visitors.

The Project would support sustainable development. The Project's buildings will be designed to meet LEED certification standards. The Project would comply with the City's EV Parking requirements and would provide on-site short and long-term bicycle parking throughout the Project Site. The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment. The Project would investigate the use of local low carbon materials and EPDs to promote the City's green material economy by using the "Buy Clean California Act" (AB 262) as a reference and resource. The Project would use cool roof/pavement coatings to reduce the urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and provide dedicated on-site recycling areas. Therefore, the Project would not conflict with policies to provide sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability.

Each building would be designed with unique architecture and use programs. However, the proposed buildings would be designed to work in relationship with the overall design and program to complement and support the Project as a whole. The buildings include design references to warehouses and lofts, apartment blocks, industrial sheds, and contemporary infill. The architecture would be modern and scaled to address both the Project and the surrounding buildings. The Project would include varied building materials to reinforce the urbanity of the design and the eclectic nature of the individual buildings. The Project's design strategy is to organize an assemblage of smaller buildings that break down the scale of development to reduce the visual massing impact and emulate the organic urbanism of the neighborhood. This development strategy, in addition to setbacks and varied building articulation, is intended to contribute to a walkable and human-scaled environment. In the event the West Volume of the LACS is adaptively reused (see discussion below), the West Volume architecture would be preserved preventing deterioration of the building. The surrounding buildings would be designed to be visually compatible with the West Volume.

Therefore, the Project would not conflict with policies to eliminate conditions of blight and deterioration within the Project Area and to prevent the establishment of new blight.

As discussed above for the General Plan Open Space Element, the Project would demolish the East Volume of the LACS Building and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 to CULT-MM-8 in Section IV.B, *Cultural Resources*, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 to CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. This impact has been disclosed as significant and unavoidable impact in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR such as construction-related impacts in Section IV.A, *Air Quality*, and Section IV.G, *Noise*.

As shown in Table LU-6, the Project would partially conflict with one goal pertaining to the preservation of historic resources. However, since the Project would not conflict with other relevant goals of the Central Industrial District Redevelopment Project, and this impact has been identified as significant and unavoidable in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, the Project would be substantially in conformance with the Central Industrial District Redevelopment Project and, therefore, not in conflict with the Central Industrial District Redevelopment Project causing a significant environmental impact that is not already disclosed in another section of this Draft EIR or considered to be a land use impact.

(k) *Adaptive Reuse Ordinance*

The Project would not conflict with the policies of the Adaptive Reuse Ordinance to develop a live/work and residential community in downtown Los Angeles, thus creating a more balanced ratio between housing and jobs in the region's primary employment center. Further, the mixed-use character of the Project would not conflict with policies of the Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses in order to improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels and transit services near each other.

As discussed above for the General Plan Open Space Element, the Project would demolish the East Volume of the LACS Building and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 to CULT-MM-8 in Section IV.B, *Cultural Resources*, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per

Mitigation Measures CULT-MM-1 to CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. This impact has been disclosed as significant and unavoidable impact in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR such as construction-related impacts in Section IV.A, *Air Quality*, and Section IV.G, *Noise*.

With this impact identified as a significant and unavoidable impact in Section IV.B, *Cultural Resources*, and accounted for in other sections of the Draft EIR, the Project would not otherwise conflict with the Adaptive Reuse Ordinance such that it would otherwise cause a significant environmental impact to occur that is not already disclosed in another section of this Draft EIR or considered to be a land use impact.

(I) *Los Angeles Municipal Code*

All development activity on the Project site is subject to the City of Los Planning and Zoning Code. The North Site is zoned M2-2D-O and the South and West Sites are zoned M2-2D. "M2" indicates Light Industrial and permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The "2D" indicates Height District 2D, which does not limit the height of buildings on these properties but would limit the FAR to 3:1. Because of the Industrial Designation and the FAR limitation, the Project is seeking a General Plan Amendment pursuant to LAMC Section 11.5.6 A to re-designate the underlying land use from Light Industrial to Regional Commercial, and a Vesting Zone Change and Height District Change pursuant to LAMC Sections 12.32 F and 12.32 Q, to change the zone from M2-2D/M2-2D-O to C2-2, which involves removing the D Development Limitation. The Project is located within the Framework Element's Downtown Center and would be consistent with the General Plan designation that supports hotels, professional offices, corporate headquarters, and high-rise residential towers within the Downtown Center.

The Project is seeking Affordable Housing Development Incentives under LAMC Section 11.5.11 to allow the following incentives:

- a. FAR increase to 7.13:1; and
- b. Averaging of FAR, parking, and open space across the Project Site.

Pursuant to LAMC Section 12.24 W.1, the Project is also seeking a Master Conditional Use permit to allow the sale and dispensing of alcoholic beverages for on-site and/or off-site consumption. In addition, pursuant to LAMC Section 16.05 for approval of development of a project which includes greater than 50,000 gross sf of nonresidential floor area, the Project would require a Site Plan Review. Furthermore, the Project would merge 35 existing lots and re-subdivide into four (4) ground lots and 26 air space lots for commercial and residential purposes under a Vesting Tentative Tract Map in accordance with LAMC Section 17.15. The Project would also enter into a Development Agreement pursuant to Government Code Sections 65864 et seq.

With the approval of the requested entitlements pursuant to LAMC regulations, the Project would not conflict with land use policies and regulations of the LAMC.

(m) *Conclusion*

As discussed above, the Project would be in substantial conformance with the plans, policies and regulations of applicable land use plans. The adaptive reuse of the West Volume of the LACS Building in the North Site is a component of the Project's conceptual plans and it is the Applicant's intent to retain the portion of the building. However, a confirmation of its structural integrity cannot be made until the existing operations cease (when and if the Project is approved) and the North Site building is "unfrozen." See Mitigation Measures CULT-MM-1 to CULT-MM-8 in Section IV.B, *Cultural Resources*, of this Draft EIR for a discussion of the mitigation measures pertaining to the potential adaptive reuse of West Volume within the LACS Building. Regardless, the Project would demolish the East Volume of the LACS Building. For purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 to CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. This impact has been disclosed as significant and unavoidable impact in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR such as construction-related impacts in Section IV.A, *Air Quality*, and Section IV.G, *Noise*.

Because the physical effects of the removal of the LACS Building are evaluated in full in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, the potential for conflicts with some of the land use plans, described above, is not considered to be a significant land use impact. **Accordingly, as related to land use and planning impacts analyzed in this section of the Draft EIR, impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, lists 39 related projects that are planned or are under construction within Downtown Los Angeles. The area surrounding the Project Site is comprised of historically industrial and manufacturing-oriented properties, many of which are recently experiencing changes in land use through adaptive reuse, infill development, and redevelopment, including residences, office, and live/work uses, as well as retail, galleries and museums, studios, restaurants, and bars. The related projects in proximity to the Project Site would have the greatest potential to contribute to cumulative adverse land use impacts.

The majority of the related projects are mixed-use, residential and commercial, including retail, restaurant and office floor area. Other related projects do not include residential uses and propose solely commercial and/or retail uses. As shown in Chapter III, Figure III-1, *Related Projects Map*, in this Draft EIR, the nearest related projects easterly of the Project Site are Related Project No. 24 at 400 S. Alameda Street (66-room hotel and 5,400 sf of mixed restaurant/retail uses); Related Project No. 5 at 1129 E. 5th Street (113-room hotel, 129 residential units, and 81,326 sf of mixed commercial uses), and Related Project No. 22 at 1100 E. 5th Street (218 live/work units and 21,975 sf of open space and recreation. The nearest related projects westerly of the Project Site are Related Project No. 29 at 803 E. 5th Street (95 apartments and 9,210 sf of commercial uses), Related Project No. 9 at 719 E. 5th Street (42-room hotel), Related Project No. 18 at 713 E. 5th street (51 dwelling units), and Related Project No. 19 at 508 E. 4th Street (41 residential units). These uses are typical of those throughout the Central City East District and, as noted, include live/work units and other uses related to the Arts District.

(a) Consistency with Plans and Policies

The Project Site is located within a TPA as designated by the City in response to SB 743 (PRC Section 21099(d)(1)) of the Public Resources Code. The majority of related projects are mixed-use in nature, combining commercial uses with high-density residential uses. Almost all of the related projects are concentrated along key transportation corridors and within TPAs. The Project would contribute to the concentration of mixed-use infill development within a TPA.

As with the Project, related projects would be required to comply with the regional and local land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. The related projects are urban infill in nature and, while increasing density, the majority of related projects in the Central City East District would need to seek individual entitlements to change existing zoning and land use designations. Such related projects would be evaluated for consistency with existing and proposed zoning and land use designations for given properties. The Project, together with the related projects, would provide a range of much-needed housing and employment opportunities in Downtown Los Angeles, and near the Arts District.

The Project, in combination with related projects, would not conflict with the applicable plans and policies adopted for the purpose of avoiding or mitigating a significant environmental effect. Therefore, cumulative impacts with respect to land use and planning would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding land use and planning 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.