

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 conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impacts related to the potential physical division of an established community were fully evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including: Section IV.A, Air Quality, which evaluates the Project's consistency with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) and the City of Los Angeles (City) General Plan (General Plan) Air Quality Element; Section IV.E, Greenhouse Gas Emissions, which evaluates the Project's consistency with the 2022 Scoping Plan, the City's Green Building Code, and the Green New Deal; Section IV.I, Transportation (and the Transportation Assessment included as Appendix J of this Draft EIR), which evaluates the Project's consistency with the City's Circulation Element (i.e., Mobility Plan 2035) and Vision Zero Action Plan, as well as many of the plans discussed herein as they relate to transportation; and Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, which evaluates the Project's consistency with the Los Angeles Department of Water and Power's (LADWP) Urban Water Management Plan (UWMP). Project consistency with the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is evaluated in this section and also evaluated in Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

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

- California Senate Bill 743;
- California Coastal Act of 1976;
- Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles General Plan;
 - Wilshire Community Plan;
 - Miracle Mile Community Design Overlay District
- City of Los Angeles Municipal Code;
- City of Los Angeles Citywide Design Guidelines

(1) State

(a) California Government Code Section 65302

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

(b) Senate Bill 375

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

(c) Senate Bill 743

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

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

PRC Section 21064.3, as amended by AB 2553, defines “major transit stop” as a site containing either an existing rail or bus rapid 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 20 minutes or less during the morning and afternoon peak commute periods.

Pursuant to PRC Section 21099, the Project is a mixed-use residential development that would be located on an infill site within a TPA. The Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Furthermore, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing or planned “major transit stop” (i.e., the new Metro D Line Wilshire/La Brea Station across Detroit Street from the Project Site). The Project Site is also well-served by a variety of other public transit options along Wilshire Boulevard provided by Metro and the Los Angeles Department of Transportation (LADOT).

The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in the ZI No. 2452.¹

(2) Regional

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

Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law, it is designated as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. The agency develops long-range regional transportation plans including SCS and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the SCAQMD's Air Quality Management Plan (AQMP).²

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

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

The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZs). Projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to

¹ City of Los Angeles, *Zone Information and Map Access System (ZIMAS) Parcel Profile Report for the Project Site*, July 5, 2024.

² SCAG, *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, adopted March 8, 2025.

conduct required modeling, and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. These projections are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG’s core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The 2024–2050 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region’s long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.³

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS’s vision and achievement of SCAG’s goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development Areas (PDAs), housing in the region, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and agricultural lands preservation, and climate resilience. SCAG has identified development within such areas as the framework for implementing the Regional Planning Policies.

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

³ SCAG, *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, adopted March 8, 2025.

Livable Corridors,⁴ TPAs, and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also located within High-Quality Transit Corridors (HQTCs).⁵

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),⁶ 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,⁷ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services.

⁴ SCAG defines Livable Corridors as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors, and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. Growth at strategic nodes along key corridors, many of which are High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT) and other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.

⁵ A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as Monday through Friday, between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M.

⁶ City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed April 16, 2025.

⁷ 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).

The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(1) Land Use Chapter

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

(2) Housing Chapter

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

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

(3) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods

and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings, and second, to enhance the physical character of neighborhoods and communities within the City.⁸ The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(4) Open Space and Conservation Chapter

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

(5) Economic Development Chapter

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

⁸ *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

(6) Transportation Chapter

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

(7) Infrastructure and Public Services Chapter

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

(ii) Mobility Plan 2035

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

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

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

(iii) Conservation Element

The 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.⁹ Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues, such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5, An Environment Where Life Thrives*, which identifies the following environmental policies:

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

Included in this General Plan element are policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State,

⁹ *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, 2015.*

regional, and local policies that call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(vi) Land Use Element (Wilshire Community Plan)

The Project Site is located within the boundaries of the Wilshire Community Plan (Community Plan), which is one of 34 Community Plans which together form the Land Use Element of the General Plan. The Wilshire Community Plan was adopted in 2001 and generally covers the Wilshire Miracle Mile area, including the neighborhoods of Park La Brea, Hancock Park, Country Club Park, and Koreatown, among others, is the land use element of the General Plan applicable to the Community Plan Area. The Community Plan implements the General Plan Framework Element and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. The following goals, objectives, and policies in the Community Plan are applicable to the Project and were adopted for the purpose of avoiding or mitigating an environmental effect:

- **Policy 1-1.1:** Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.
- **Policy 1-3.1:** Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.
- **Policy 1-1.3:** Provide for adequate Multiple Family residential development.
- **Objective 1-2:** Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.
- **Policy 1-2.1:** Encourage higher density residential uses near major public transportation centers.
- **Policy 1-4.1:** Promote greater individual choice in type, quality, price and location of housing.
- **Goal 2:** Encourage strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire community through well-designed, safe and accessible areas, while preserving historic and cultural character.

- **Objective 2-1:** Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.
- **Policy 2-1.3:** Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.
- **Policy 2-2.3:** Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.
- **Objective 2-3:** Enhance the visual appearance of commercial districts.
- **Goal 5:** Provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the Wilshire Community, and to protect environment and aesthetic resources.
- **Policy 8-1.1:** Consult with the LAPD in review of development projects and land use changes to determine law enforcement needs and requirements.
- **Policy 8-2.2:** Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.
- **Policy 8-2.3:** Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.
- **Policy 9-1.1:** Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan Amendments affecting land use to determine the impacts on service demands.
- **Goal 11:** Encourage a system of safe, efficient and attractive bicycle and pedestrian facilities.
- **Policy 11-1.4:** Support the provision of bicycle facilities in all new development.
- **Objective 11-2:** Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.
- **Goal 12:** Encourage alternative modes of transportation to reduce single-occupancy vehicular trips.
- **Goal 17:** Preserve and restore cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.
- **Objective 17-1:** Ensure that the Wilshire Community's historically significant resources are protected, preserved, and/or enhanced.

- **Policy 17-1.1:** Encourage the preservation, maintenance, enhancement and reuse of existing historic buildings and the restoration of original facades.

(b) *Los Angeles Municipal Code*

(i) *Zoning*

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.

(ii) *Transit Oriented Communities Affordable Housing Incentive Guidelines*

In 2016, Los Angeles voters passed Measure JJJ, which among other things, created the Transit Oriented Communities (TOC) Affordable Housing Incentive Program to provide development incentives for the construction of affordable housing in transit-rich neighborhoods of the City. The TOC Program is codified in LAMC Section 12.22 A.31 as the Transit Oriented Communities Affordable Housing Incentive Guidelines (TOC Guidelines).

The TOC Guidelines set forth tier-based incentives (i.e., density bonuses, etc.) that permit residential development in excess of the floor area permitted by existing zoning in specified transit-heavy areas (i.e., areas within 2,640 feet or less of a Major Transit Stop¹⁰) for projects that provide certain percentages of their total housing units as affordable units. In each Tier, which is based on proximity to major transit stops (with Tier 1 being least transit-heavy and Tier 4 most transit-heavy), a Housing Development shall provide On-Site Restricted Affordable Units at a rate of at least the minimum percentages described below:¹¹

- a. Tier 1—8 percent of the total number of dwelling units shall be affordable to Extremely Low Income (ELI) income households, or 11 percent of the total number of dwelling units shall be affordable to Very Low (VL) income households, or 20 percent of the total number of dwelling units shall be affordable to Lower Income households.
- b. Tier 2—9 percent ELI, or 12 percent VL or 21 percent Lower.

¹⁰ *Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 20 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).*

¹¹ *LAMC Sec. 12.22.a.31.*

- c. Tier 3—10 percent ELI, or 14 percent VL or 23 percent Lower.
- d. Tier 4—11 percent ELI, or 15 percent VL or 25 percent Lower.

In each Tier, the maximum increase in the base density permitted by the applicable zoning is as follows: Tier 1— 50 percent; Tier 2—60 percent; Tier 3—70 percent; and Tier 4—80 percent.¹²

(c) Citywide Design Guidelines

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

(d) Miracle Mile Community Design Overlay District

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

The Miracle Mile CDO, adopted by the City Planning Commission on July 8, 2004, provides guidelines and standards for public and private development projects in

¹² LAMC Sec. 12.22.a.31.

commercially zoned areas along the Miracle Mile.¹³ The intent of the Miracle Mile CDO is to provide guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity, and promote the pedestrian environment of the District.

All projects within the boundaries of the CDO are encouraged to comply with the Design Guidelines and Development Standards of the CDO. These requirements have the overall goal of preserving the unique Art Deco character of the Miracle Mile District while attracting new businesses and customers, and providing for the comfort, convenience, and safety of workers, residents, and shoppers. The specific goals of the CDO are to promote development that preserves and enhances the physical appearance of the corridor and contributes to the district's unique historical context; encourage development that adds to a pedestrian-friendly retail environment and contributes to the safety and comfort of both pedestrian and automobile traffic; provide direction in site planning and ensure a high degree of design in development of the Miracle Mile through the use of Design Guidelines and Development Standards; and preserve architecturally-significant buildings in the Miracle Mile by providing direction of the responsible rehabilitation of these developments.¹⁴

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the 56,366 square foot (1.29-acre)¹⁵ Project Site is located at 5350–5376 Wilshire Boulevard, 706–716 Cloverdale Avenue, and 721–725 Detroit Street. Wilshire Boulevard, Cloverdale Avenue, and Detroit Street border the Project Site to the north, west, and east while existing development borders the Project Site to the south. As shown in Figure II-2 in Section II, the Project Site is currently developed with four commercial buildings along Wilshire Boulevard and surface parking areas to the south of these buildings. The existing buildings range from one to two stories in height and include approximately 48,229 square feet commercial (retail, restaurant, and office) uses. The existing on-site buildings are located within the boundary of the Miracle Mile Historic District (Historic District), which was formally determined eligible for listing in the National Register of Historic Places in 1983 through the federal Section 106 review process and, as a result, is listed in the California Register of Historical Resources.¹⁶

¹³ Ordinance No. 176,331, effective January 16, 2005. City of Los Angeles, *Miracle Mile Community Design Overlay District*, approved by the Planning Commission July 8, 2004.

¹⁴ City of Los Angeles, *Miracle Mile Community Design Overlay District*, approved by the Planning Commission July 8, 2004.

¹⁵ 59,168 square feet (1.36-acre) with the proposed vacation and merger of the Detroit Street alley into the Project Site.

¹⁶ ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

All four on-site buildings are identified as contributors to the Historic District, while a portion of the façade of the building located at 5366–76 Wilshire Boulevard is also designated as Los Angeles HCM No. 451 (see Section IV.B, Cultural Resources, of this Draft EIR for discussion). Vehicular access to the Project Site is provided via two driveways on Cloverdale Avenue and a dead-end 20-foot wide public alley that is accessed from Detroit Street and terminates at the middle of the Project Site. Pedestrian access to the Project Site is located along Wilshire Boulevard, Detroit Street, and Cloverdale Avenue. Existing landscaping within the Project Site includes 17 non-protected trees. In addition, nine street trees and two empty tree wells are located in the public right of way along the perimeter of the Project Site.¹⁷

As shown in Figure IV.F-1 on page IV.F-18, the Community Plan's land use designation for the Project Site is Regional Commercial and High Medium Residential. Specifically, the majority of the Project Site is designated for Regional Commercial land uses, while the southeastern corner of the Project Site, comprised of 6,702 square feet of existing lot area, is designated for High Medium Residential land uses.

As shown on Figure IV.F-2 on page IV.F-19, the northern portion of the Project Site, comprised of 34,817 square feet of existing lot area, is zoned [Q]C4-2-CDO (Qualified Condition, Commercial Zone, Height District 2, Miracle Mile Community Design Overlay District). The southern portion of the Project Site, comprised of 14,847 square feet of existing lot area, is zoned [Q]C2-1-CDO (Qualified Condition, Commercial Zone, Height District 1, Miracle Mile Community Design Overlay District). The southeastern corner of the Project Site, comprised of 6,702 square feet of existing lot area, is zoned [Q]R4-1 (Qualified Condition, Residential Zone, Height District 1).¹⁸

Pursuant to the LAMC, the C4 zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. Height District 2, in conjunction with the C4 zone, does not impose any height limit but limits maximum FAR to 6:1. The C2 zone permits the same array of land uses as C4. Height District 1, in conjunction with the C2 zone, does not impose a height limit but limits maximum FAR to 1.5:1. Pursuant to LAMC Section 12.22 A.18, the C4 zoned portion of the Project Site permits a residential density of one dwelling unit per 200 square feet of lot area for a mixed-use development. The Qualified "Q" Conditions on the Project Site, established under Ordinance No. 176,332 effective January 16, 2005, limit the use of the C2 lots to parking and residential uses up to an R4-level density (400 square feet of lot area per dwelling unit). In addition, the Q conditions limit market-rate residential projects on the R4-zoned lot to an R3-level density (800 square feet of lot area

¹⁷ *Tree Case Management, Inc., Tree Survey Report, October 6, 2022. See Appendix A of this Draft EIR.*

¹⁸ *City of Los Angeles, Zone Information and Map Access System (ZIMAS) Parcel Profile Report for the Project Site, July 5, 2024.*



LEGEND

RESIDENTIAL

- Medium Residential
- High Medium Residential

COMMERCIAL

- General Commercial
- Regional Center Commercial

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



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

per unit). Other Q Conditions address site planning, circulation, architecture, parking, signage, and landscaping.

The R4 zone permits churches, schools, childcare, apartment homes, and one-family dwellings land uses. Height District 1, in conjunction with the R4 zone, does not impose any height limit with an allowable FAR of 3:1. The “CDO” designation indicates that the Project Site is located within the boundaries of the Miracle Mile Community Design Overlay (CDO) District (discussed further below).

The Project Site is located in a TOC Tier 4 zone¹⁹ as a result of its location across Detroit Street from the new Metro D Line Station at the southeast corner of Wilshire Boulevard and Detroit Street. As discussed in Section II, Project Description, of this Draft EIR, the Project is proposing that 11 percent of the proposed housing units be ELI units. The residential density permitted at the Project Site under the existing zoning (i.e., base density) and the 80-percent increase permissible pursuant to the TOC program is outlined in Table IV.F-1 on page IV.F-21.

The Project Site is also located in a TPA, as defined by the SB 743 and the City’s ZI File No. 2452,^{20,21} and a portion of the Project Site is identified as being located within a Metro ROW Project Area.²²

(2) Surrounding Uses

As shown in Figure II-2 in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is developed primarily with a mix of low- to high-rise commercial, and residential uses. Uses located adjacent to the Project Site include two- to six-story buildings comprised of commercial and residential uses across Wilshire Boulevard to the north, two- and three-story residential buildings to the south, a two- and ten-story commercial building and surface parking to the west, and the new Metro D Line Wilshire/La Brea Station across Detroit Street from the Project Site to the east. There are also several existing and proposed mid- and high-rise towers in and just outside the Miracle Mile area located along

¹⁹ ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

²⁰ SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a TPA shall not be considered significant impacts on the environment.” TPAs are areas within 0.5 mile of a major transit stop that are existing or planned. Thus, in accordance with SB 743 and the City’s ZI No. 2452, the Project’s aesthetic and parking impacts are not considered significant as a matter of law.

²¹ ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

²² ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

**Table IV.F-1
Permitted Residential Density under the TOC Guidelines**

Existing Zoning Designation	Lot Areas with Alley Merger Prior to Dedication	Base Density Ratio	Base Density	80-Percent TOC Incentive
[Q]C4-2-CDO	36,218 sf	1 du/200 sf	182 du	328 du
[Q]C2-1-CDO	16,248 sf	1 du/400 sf	41 du	74 du
[Q]R4-1	6,702 sf	1 du/800 sf	9 du	17 du
Totals	59,168 sf	—	232 du	419 du
<i>du = dwelling units</i> <i>sf = square feet</i> <i>Source: Eystone Environmental, 2024.</i>				

Wilshire Boulevard, including the 12-story Wilshire Tower at 5514 Wilshire, the 14-story Bank of American Building at 5420 Wilshire, the 20-story Miracle Mile Tower at 5455 Wilshire, the 27-story Citibank Boulding at 5670 Wilshire, the 31-story SBE Building at 5900 Wilshire Boulevard, and a proposed 42-story tower (Mirabel Project) across Wilshire Boulevard from the Project Site at 5411 Wilshire, which is currently in the environmental review phase. The General Plan land use designations surrounding the Project Site are Regional Commercial and High Medium Residential, while the zoning designations are commercial and high-density residential (i.e., [Q]C4-2-CDO, [Q]C2-1-CDO, [Q]R4-1-HPOZ, and [Q]R4-1).

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold question.

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

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

b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents applicable to the Project Site that were adopted to mitigate or avoid an environmental effect. State CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by CEQA Guidelines Section 15382. Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

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

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. As discussed in the State of California General Plan Guidelines (2017) published by the Office of Planning and Research, now the Office of Land Use and Climate Innovation, a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable

general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.²³

c. Project Design Features

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

d. Analysis of Project Impacts

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

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the proposed uses would occur within the boundaries of the Project Site which is an urban infill site surrounded on three sides by public streets. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

Threshold (b): Would the Project 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?

(1) Impact Analysis

(a) Consistency with Regional Plans

The Project’s potential to conflict with the applicable policies set forth in the 2024-2050 RTP/SCS is analyzed in Table 1 of Appendix F of this Draft EIR. As detailed therein, the Project generally would not conflict with the applicable policies set forth in the 2024-2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, because the Project would be located within a City-designated TPA, SCAG-designated Livable Corridor, and HQTIC, in an area well-served by Metro rail and various local bus lines, the Project would contribute to the productivity and use of the regional

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

transportation system.²⁴ The Project would provide housing, employment, and local-serving uses near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with the 2024-2050 RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the 2024-2050 RTP/SCS goal of maximizing mobility and accessibility in the region while at the same time reducing VMT and GHG emissions.

Furthermore, the Project would provide: (1) bicycle parking facilities and a repair station meeting LAMC requirements that would serve to promote use of bicycles; (2) pedestrian enhancements including, but not limited to, new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, outdoor dining and seating areas, and landscaping; and (3) comply with applicable City and CALGreen EV charging requirements. Specifically, the Project would be required to provide Level 2 EV charging receptacles in 373 residential parking spaces and in 3 commercial parking spaces. An additional 13 commercial parking spaces are required to be electric vehicle (EV) ready capable of supporting future EV supply equipment (EVSE). Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the 2024-2050 RTP/SCS adopted specifically to mitigate or avoid an environmental impact.

(b) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with applicable goals, objectives, and policies of the General Plan, including the Framework Element, Transportation Element (Mobility Plan), Housing Element, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), Wilshire Community Plan, LAMC (Zoning Code), Citywide Design Guidelines, and the Miracle Mile CDO that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. The Project's general consistency with the applicable goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect set forth in the local plans and regulatory documents applicable to the Project Site is discussed in detail in Appendix F of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect.

²⁴ *The 2020-2045 RTP/SCS mapped the Project as being located within a SCAG-designated HQTAs. The 2024-2050 RTP/SCS does not use the HQTAs designation as part of its Priority Development Areas (previously referred to as Priority Growth Areas) and instead uses a new designation referred to as Livable Corridors. Livable Corridors are defined as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. SCAG also recognizes that many of these key corridors are also HQTAs.*

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

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

(a) Land Use Chapter

The Framework Element's Long-Range Land Use Diagram shows that the Project Site is located within a designated Regional Center.²⁵ In addition, Policy 3.1.4 of the Framework Element's Land Use Chapter calls for accommodating new development in accordance with the Framework's Land Use Diagram, while Objective 3.4 calls for encouraging new multi-family residential, retail and commercial development in the City's Regional Centers. The Long-Range Land Use Diagram describes a Regional Center as: (1) a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services in close proximity jobs, services and transit; (2) characterized by a floor area ratios of 2.5:1 to 6.0:1 uses ranging from 6 to 20-stories (or higher); and (3) generally being commercial or mixed-use oriented. As described in Section II, Project Description, of this Draft EIR, the Project would be a high-density mixed-use Project with a total of 420,201 square feet of floor area including 419 residential units, residential amenities and 2,645 square feet of restaurant uses, along with associated parking and both public and private open space, resulting in a maximum FAR of approximately 7.51:1, and a maximum building height of 46 stories. Hence, the Project would be consistent with the type, density and height of land uses encouraged within a Regional Center. The Project would also represent the intensification of urban density on an urban infill site within a TPA²⁶ and in close proximity to jobs, services and transit (including the future Metro D Line Wilshire/La Brea Station under construction across Detroit Street from the Project Site). Therefore, the Project would be consistent with the Framework Element's Long-Range Land Use Diagram's Regional Center designation of the Project Site and Land Use Chapter's associated objectives and policies.

The Project would also support Land Use Chapter Goal 3A to provide a physically balanced distribution of land uses that contributes towards the City's long-term fiscal and

²⁵ ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

²⁶ ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

economic viability and revitalizes economically depressed areas, and Land Use Chapter Objective 3.1 to accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses and visitors, by redeveloping an underutilized site with high-density housing, inclusive of 47 Extremely Low-Income affordable units, which the City desperately needs (per SCAG's RHNA), and developing this housing within an existing employment center.

The Project would also support Land Use Chapter Policy 3.2.4 to provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts. The Project Site is located in an urbanized transit-rich area, and rather than being in a stable residential neighborhood is surrounded by a mix of commercial, office, retail, restaurant, multi-family residential, and parking uses. The Project would introduce uses similar to and compatible with the mix of land uses on and surrounding the Project Site. In particular, the Project would be consistent with other mid- and high-rise development along Wilshire Boulevard in and just outside the Miracle Mile area, including the 12-story Wilshire Tower at 5514 Wilshire, 14-story Bank of American Building at 5420 Wilshire, 20-story Miracle Mile Tower at 5455 Wilshire, 27-story Citibank Boulding at 5670 Wilshire, 31-story SBE Building at 5900 Wilshire Boulevard, and a proposed 42-story tower (Mirabel Project) across Wilshire Boulevard from the Project Site at 5411 Wilshire which is currently in the environmental review phase. The Project would also create additional housing to meet a demand in the City, and would focus high-density mixed-use development along a commercial corridor that is characterized by a high degree of transit and pedestrian activity (including the new Metro D Line Wilshire/La Brea Station across Detroit Street from the Project Site).

The Project would also support Land Use Chapter Objective 3.7 to provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved. Specifically, because the Project Site does not contain any existing residential use and is located in an area characterized by a wide variety of commercial and multi-family residential uses, the Project would not displace existing housing or intrude into an existing established residential neighborhood, while at the same time would contribute to growth in an area where there is sufficient public infrastructure and services to accommodate that growth. Specifically, as discussed in Section IV.H.1, Public Services—Fire Protection, and Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would not require the addition of a new fire or police station or the expansion of an existing facility in order to maintain service. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would upgrade approximately 685 feet of the existing 6-inch water main on Detroit Street and would include the installation of three new hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard. Upon completion of the proposed improvements prior to Project build-out, sufficient capacity would be available

to serve the Project Site. Furthermore, as discussed in Section IV.K.2, Utilities and Service Systems—Wastewater Infrastructure; IV.K.3, Utilities and Service Systems—Energy Infrastructure; and the Initial Study included in Appendix A of this Draft EIR, sufficient capacity would be available to serve the Project Site for sewer infrastructure, energy infrastructure, and solid waste infrastructure. The Project would also comply with required improvement conditions required as part of the Tract Map process, such as new curbs, gutters, sidewalks, and street trees, and would not conflict with Land Use Chapter Policy 3.10.4 that establishes a program for the City to improve neighborhood streetscapes. These improvements would serve to enhance the pedestrian environment and, together with the location of the Project on an urban infill site within a TPA²⁷ and in close proximity to transit, would facilitate a reduction of vehicle trips and vehicle miles traveled.

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

(b) Housing Chapter

The Project would support Framework Housing Chapter Goal 4A to provide a distribution of housing opportunities by type and cost through the development of 419 new residential units (inclusive of 47 Extremely Low-Income affordable units) comprising 206 1-bedroom units, 208 2-bedroom units, and five penthouse units consisting of two 3-bedroom units and three 4-bedroom units. The Project would encourage a range of new housing opportunities in close proximity to existing jobs and transit (including the future Metro D Line Wilshire/La Brea Station and several existing bus lines) as called for by Housing Chapter Objective 4.2 by locating the proposed mix of multi-family housing types in a vibrant and active area well-served by public transit, particularly since the Project Site is within a City-designated TPA and SCAG-designated Livable Corridor, and HQTIC. Furthermore, the Project would help the City meet its SCAG RHNA-identified share of regional housing demand by providing 419 new multi-family residential units in a range of sizes. Therefore, the Project would not conflict with the applicable goals and objectives set forth in the Framework Element's Housing Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Urban Form and Neighborhood Design Chapter

The Project would promote Framework Element Urban Form and Neighborhood Design Chapter Goal 5A by contributing to the overall livability of the City. Specifically, the Project would support Urban Form and Neighborhood Design Chapter Objective 5.2 to encourage future development in centers and in nodes along corridors that are served by

²⁷ ZIMAS Parcel Profile Report for the Project Site, July 5, 2024.

transit and are already functioning as centers for the surrounding neighborhoods, the community or the region as the Project Site is located within a TPA in an area well served by transit (including the new Metro D Line Wilshire/La Brea Station across Detroit Street from the Project Site) with a designed Regional Center and the Wilshire Boulevard urban corridor. Consistent with Urban Form and Neighborhood Design Chapter Objective 5.8 the Project would retain and reuse the existing historic structures along Wilshire Boulevard, reinforcing the existing pedestrian orientation along Wilshire Boulevard, a pedestrian oriented area, historically and as envisioned in the Miracle Mile Community Design Overlay. Further, the Project would comply with required improvements such as new or upgraded curbs, gutters, and sidewalks with street trees. Furthermore, as provided in Project Design Feature POL-PDF-2 Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would include features to enhance safety within and immediately surrounding the Project Site including, but not limited to: private on-site security; a closed-circuit security camera system; keycard entry for residents; lighting of building entries and walkways; and provision of high-visibility pedestrian paths and entries into the buildings. Thus, the Project would not conflict with the applicable objectives set forth in the Framework Element's Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Economic Development Chapter

The Project would support Economic Development Chapter Objective 7.2 to establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. The commercial uses would help meet the needs of local residents and foster continued economic investment. In addition, the Project Site would have convenient access to public transit (including the new Metro D Line Station across Detroit Street from the Project Site) and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, per capita VMT, GHG emissions, and air pollution to ensure maximum feasible environmental quality.

The Project would also support Framework Element Economic Development Chapter Policy 7.2.2 to concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors by providing commercial and much needed housing for employees within a designated Regional Center. The Project Site is designated Regional Commercial and High Medium Residential by the Framework Element's Long-Range Land Use Diagram and the Community Plan and the immediate vicinity contains a mix of commercial, office, industrial, transit, and residential uses which provide a wide range of commercial uses and job opportunities for future residents. Furthermore, the Project is located in an area that is well-served by several transit lines which would reduce VMT.

The Project would also support Economic Development Chapter Objective 7.9 to ensure that the available range of housing opportunities is sufficient by providing different housing unit types at various costs through the development of 419 new residential units (inclusive of 47 Extremely Low-Income affordable units) comprising 206 1-bedroom units, 208 2-bedroom units, and five penthouse units consisting of two 3-bedroom units and three 4-bedroom units. The Project would also locate new housing on an urban infill site within a City-designated TPA²⁸ in close proximity to existing jobs, shopping, services, and transit as called for by Objective 7.9.

Thus, the Project would not conflict with the applicable objectives and policies set forth in the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(e) Infrastructure and Public Services Chapter

The Project would support Infrastructure and Public Services Chapter Goal 9C and Objective 9.10 to ensure adequate water supply, storage facilities, and delivery systems to serve the needs of existing and future residents and businesses. Specifically, as discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and confirmed in the Project's Water Supply Assessment included as part of Appendix H of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Additionally, as discussed in Section IV.K.1, in order to meet fire flow requirements, the Project would upgrade approximately 685 feet of the existing 6-inch water main on Detroit Street as well as the installation of three new hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard. Upon completion of the proposed improvements prior to Project build-out, sufficient capacity would be available to serve the Project Site. As such, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.

The Project would support Infrastructure and Public Services Chapter Goal 9A to provide adequate wastewater collection and treatment capacity. Specifically, as discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board, and the Los Angeles Bureau of Sanitation determined that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. Furthermore, as concluded in Section IV.K.2, the Project would

²⁸ City of Los Angeles, *Zone Information and Map Access System (ZIMAS) Parcel Profile Report for the Project Site*, July 5, 2024.

not exceed the available capacity within the wastewater collection infrastructure that would serve the Project.

Lastly, the Project would support Infrastructure and Public Services Chapter Goal 9F to provide adequate collection, transfer and disposal of mixed solid waste. Specifically, as discussed in the Initial Study, which is included as Appendix A of this Draft EIR, the Project would provide the LAMC-required space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. Based on the above, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. In addition, as concluded in the Initial Study, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project.

Based on the above, the Project would not conflict with the applicable goals, objectives and policies of the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(2) Mobility Plan 2035

The Project's general consistency with the applicable policies set forth in the Transportation Element (Mobility Plan) adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 3 of Appendix F of this Draft EIR. Additional policies related solely to transportation are also evaluated in Table IV.I.1 of Section IV.I, Transportation, of this Draft EIR. As detailed in these tables, and as concluded in the Transportation Assessment included as Appendix J of this Draft EIR, the Project's proposed land uses and design features, including site access, pedestrian, bicycle, and transit accessibility and loading areas, would not conflict with the policies of the Mobility Plan (Policies, 2.3, 2.10, 3.1, 3.2, 5.2, 5.4, etc.).

Additionally, the Project's mix of high-density residential uses and commercial uses located in close proximity to a highly active area and adjacent to a variety of public transit options, including the future Metro D Line Wilshire/La Brea Station (located across Detroit Street from the Project Site), would support "first-mile, last-mile solutions" and would support ways to reduce VMT consistent with the Mobility Plan's Clean Environments & Healthy Communities policies (Policies 2.3, 3.1, 3.3, 3.5, and 5.2). The Project would also provide bicycle parking for residents, employees, and visitors, thereby promoting public and active transportation modes and reducing the Project VMT per capita compared to the average for the area, as demonstrated in the VMT analysis under Threshold (b) later in this section (Policy 3.8).

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

(3) Conservation Element

As identified in Subsection 2.a.(3)(a)(iii), the Conservation Element addresses the preservation, conservation, protection, and enhancement of the City's natural resources and recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Project's consistency with the Conservation Element is analyzed below.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with four historic commercial buildings along Wilshire Boulevard and surface parking areas to the south of these buildings. Existing landscaping within the Project Site includes 18 non-protected trees. In addition, nine street trees and two empty tree wells are located in the public right of way along the perimeter of the Project Site. None of the trees within the Project Site or within the public rights-of-way are considered protected species by the City.²⁹ As part of the Project, 21 trees would be removed, including 18 onsite trees and three street trees. All other trees would be avoided or preserved in place. On-site trees to be removed would be replaced at a 1:1 ratio, and street trees would be replaced on a 2:1 basis, in accordance with the Bureau of Street Services, Urban Forestry Division's requirements. Overall, the Project would provide 105 new trees (10 street trees and 95 trees on the ground level, podium/pool deck, and rooftop deck). No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within or surrounding the Project Site which provide linkages to natural open spaces areas.

With respect to historic resources, the Project would retain the existing on-site buildings which are all contributors to the Miracle Mile Historic District; only existing non-character-defining rear additions to some of the buildings would be removed. All aspects of historic integrity would be retained as required by existing regulations and Project Design Feature CUL-PDF-1 in Section IV.B, Cultural Resources, of this Draft EIR. As concluded in Section IV.B, the Project would not result in a substantial adverse change in the significance of a historic resource and its impact would be less than significant. Furthermore, the Project would not cause the demolition, destruction, relocation, or alteration of the nearby historical resources. Additionally, the introduction of a new visual feature in the larger setting of the nearby historical resources would not diminish its historic significance or integrity of the

²⁹ *Tree Case Management, Inc., Tree Survey Report, October 6, 2022. See Appendix A of this Draft EIR.*

Miracle Mile Historic District. Accordingly, the Project would not have significant impacts to the historical resources.

As discussed in Section IV.B, no archaeological resources have been previously recorded at the Project Site. As also discussed therein, while the Project would include excavations and other ground disturbing activities that could potentially impact any buried archaeological resources that may be present at the Project Site, the Project would adhere to the City's standard conditions of approval for the inadvertent discovery of archaeological resources during construction which would avoid significant impacts to archaeological resources.

With respect to paleontological resources, as detailed in Section IV.D, Geology and Soils, of this Draft EIR, no paleontological resources have been previously recorded at the Project Site. As also discussed therein, while the Project would include excavations and other ground disturbing activities that could potentially impact any buried paleontological resources that may be present, the Project would implement Mitigation Measure GEO-MM-1 to ensure that potential impacts to paleontological resources would remain less than significant.

Regarding water quality, as discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) during construction that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, the implementation of BMPs required by the City's LID Ordinance during project operation would target pollutants that could potentially be carried in stormwater runoff. The Project would similarly comply with City LID stormwater retention and BMP requirements during operation. Thus, as concluded in the Initial Study, the Project would not result in significant water quality impacts.

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

(4) Housing Element

The Project's consistency with the applicable objectives and policies set forth in the 2021-2029 Housing Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 4 of Appendix F of this Draft EIR. As discussed therein, the Project would contribute to 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 (i.e., Housing Element Goal 1 and associated objectives and policies). Specifically, the Project would provide 419 new residential units (inclusive of 47 Extremely Low-Income affordable units) comprising 206 1-bedroom units, 208 2-bedroom units, and five penthouse units consisting of two 3-bedroom units and three 4-bedroom units at a range of affordability. As such, the Project would help the City meet its SCAG RHNA-identified share of regional housing demand.

The Project would contribute housing which creates healthy, livable, sustainable, and resilient communities (i.e., Housing Element Goal 2 and the associated objectives and policies) by developing a high-density mixed-use development including multi-family housing and commercial on an in-fill site adjacent to transit. The Project would also provide pedestrian-friendly design features such as new street trees featuring decorative lighting, enhanced sidewalk paving, short-term bicycle parking, outdoor dining and seating areas, and landscaping. At the same time, the Project would complement the surrounding neighborhood by providing housing in the midst of employment opportunities and transit, and would both represent infill development across the street from the future Metro D Line Wilshire/La Brea Station and include a suite of environmental sustainability features including energy conservation features. The Project would also include bicycle parking and a bicycle repair station per the LAMC which would encourage the use of transit and other alternative modes of transportation. Overall, the Project would complement the existing neighborhood and help promote a healthy, livable, sustainable and resilient community.

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

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

The Project would be consistent with the applicable goals and objectives of the Health and Wellness Element (Plan for a Healthy Los Angeles) by expanding housing opportunities, avoiding displacement of existing housing or populations, promoting healthy living, and integrating healthy building design and construction on a site in close proximity to public transit. As previously discussed, the Project would provide 419 residential units, including 47 Extremely Low-Income affordable units. The residential units would consist of a mix of 206 1-bedroom units, 208 2-bedroom units, and five penthouse units consisting of two 3-bedroom units and three 4-bedroom units in varying sizes and configurations, thereby providing a range of housing opportunities for residents of the City. The Project would not result in the displacement of existing housing or populations as the Project Site is currently developed with is one- to two-story commercial buildings and a surface parking lot.

Furthermore, the Project would provide: (1) bicycle parking and repair facilities meeting LAMC requirements; (2) pedestrian enhancements including, but not limited to, new

street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, outdoor dining and seating areas, and landscaping; and (3) comply with applicable City and CALGreen EV charging requirements. Specifically, the Project would be required to provide Level 2 EV charging receptacles in 373 residential parking spaces and in 3 commercial parking spaces. An additional 13 commercial parking spaces are required to be EV ready capable of supporting future EVSE. Furthermore, the Project would incorporate open space areas and promote pedestrian activity, walkability, and biking and contribute to the creation of a healthy community.

Lastly, as discussed in Section IV.I, Transportation, of this Draft EIR, the Project would be developed on an urban infill site within a City-designated TPA and SCAG-designated Livable Corridor, and HQTC in close proximity to transit (including the new Metro D Line Wilshire/La Brea Station across Detroit Street from the Project Site, and would enhance pedestrian and bicycle infrastructure through encouraging the use of transit and other alternative modes of transportation, which together would reduce Project motor vehicle trips, per capita VMT within the Central Area Planning Commission (APC), fuel use, air pollution and greenhouse gas emissions.

Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element (Plan for a Healthy Los Angeles) adopted for the purpose of avoiding or mitigating an environmental effect.

(6) Wilshire Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Community Plan is discussed in detail in Table 5 of Appendix F to this Draft EIR. As discussed therein, the Project would not conflict with the objectives and policies that support the goals of the Wilshire Community Plan. Specifically, the Project would be consistent with Objective 1-2 to reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops and Policy 1-2.1 to encourage higher density residential uses near major public transportation centers. Specifically, as indicated previously, the Project Site is designated Regional Commercial and High Medium Residential by the Framework Element's Long-Range Land Use Diagram and the Community Plan, and the Project would be consistent with these existing General Plan land use designations of the Project Site (i.e., no General Plan Amendment is proposed). In addition, the Project would support reducing vehicular trips and congestion by locating a mixed-use high-density residential and commercial development in close proximity to existing jobs, transit, and services. The Project's residents, employees, and visitors would therefore have the opportunity to walk, bike, and ride transit to access the Regional Center and surrounding areas. As previously discussed, the Project is located within a City-designated Regional Center, City-designated TPA, and SCAG-designated Livable Corridor, and HQTC in close proximity to transit, including the new Metro D Line

Wilshire/La Brea Station across Detroit Street from the Project Site and a variety of existing bus lines operated by Metro, LADOT, and the Antelope Valley Transit Authority (AVTA).

In accordance with Community Plan Goal 2 and Objective 2-1 which call for strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire Community, the Project would redevelop an underutilized site by constructing a high-density multi-family housing uses and ground floor commercial space that would contribute to the City's, including the Wilshire community's, long-term fiscal and economic health by generating new employment opportunities and provide much needed housing within an employment center that would help the City meet its SCAG-identified RHNA. The Project would also retain historic structures along Wilshire Boulevard and repurpose with new uses, including new ground floor commercial uses.

In accordance with Community Plan Objective 2-3 to enhance the visual appearance of commercial districts, Objective 11-2 to promote pedestrian mobility, safety and amenities, and Objective 8-1 to provide adequate security for existing and future populations in the Wilshire community, the Project would provide new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, bike racks, outdoor dining and seating areas, and landscaping. The Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Furthermore, as provided in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would implement several design features to enhance safety within and immediately surrounding the Project Site including, but not limited to: a closed-circuit camera system; a dedicated security team for the residential tower; sufficient lighting of buildings and walkways as well as parking areas, elevators, and lobbies; and entrances, spaces around buildings, and pedestrian walkways that are designed to be open and visible from surrounding sites. These Project elements, together with the location of the Project Site within a TPA and in close proximity to transit, would promote a safe, comfortable, and accessible pedestrian experience for all and encourage pedestrian activity.

The Project would also support Goal 5 to provide sufficient open space to serve the needs of the Wilshire community. Specifically, the Project would be required to provide a minimum of 47,475 square feet of open space for utilizers of the Project and proposes 47,534 square feet of such open space, including 11,868 square feet of common indoor open space, 14,716 square feet of common outdoor open space, and 20,950 square feet of private open space including residential balconies and decks. The indoor common open space may include lounge areas, meeting room space, and a fitness center. Outdoor open space would be comprised of a pool, seating areas, fitness areas, and deck areas primarily located on levels 6 (podium) and 43 (private roof top deck areas). Additionally, the Project would provide 105 new trees (10 street trees and 95 podium/pool deck and rooftop deck trees).

The Project would also support Goal 17 to preserve and restore resources, neighborhoods, and landmarks which have historical and/or cultural significance. As previously discussed, the Project would retain the existing buildings that are contributors to the Miracle Mile Historic District. Furthermore, with compliance with applicable regulations and implementation of Project Design Feature CUL-PDF-1 requiring a Historic Structure Report (HSR), all aspects of historic integrity associated with the on-site contributors would remain. As such, the Project would not result in a substantial adverse change in the significance of a historic resource and its impact would be less than significant.

Based on the above, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(ii) *LAMC*

(1) Density, FAR, and Setbacks

As previously discussed, the northern portion of the Project Site is zoned [Q]C4-2-CDO, and the southern portion of the Project Site is zoned [Q]C2-1-CDO, except for the southeast lot which is zoned [Q]R4-1. Pursuant to LAMC Section 12.21.1 A.1, the portion of the Project Site zoned [Q]C2-1-CDO shall not exceed 1.5 times the Buildable Area and the portion of the Project Site zoned [Q]R4-1 shall not exceed three times the Buildable Area. Pursuant to LAMC Section 12.21.1 A.2, the portion of the Project Site zoned [Q]C4-2-CDO shall not exceed six times the Buildable Area. As part of the entitlement requests for the Project, the accompanying Vesting Tentative Tract Map under related Case No. VTT-83082-CN includes the vacation of an alley and the merger and resubdivision of the remaining lots. The total lot area would be determined after dedications and improvements per the subdivision process. Table II-4 in Section II, Project Description, of this Draft EIR and Table IV.F-1 in the Regulatory Framework subsection above, show the buildable area of the Project Site for the purpose of calculating floor area.

As discussed in Section IV.F 2.A(3)(b)(i) above, the C4 zoned portion of the Project Site permits a base density of one dwelling unit per 200 square feet of lot area for a mixed-use development³⁰, the C2 zoned portion permits a base density of one dwelling unit per 400 square feet of lot area, and the R4 zoned portion of permits one dwelling unit per

³⁰ Pursuant to LAMC Section 12.22 A.18, this portion of the Project Site is designated as a Regional Center by the Wilshire Community Plan and may therefore be developed with any use permitted in the R5 zone, permitting a residential density of 1 dwelling unit per 200 square feet of lot area per LAMC Section 12.12 C.4.

800 square feet of lot area.³¹ By providing 11 percent of the total units as Extremely Low-Income Units as required by the TOC Guidelines, the Project is entitled to an 80 percent density increase. In addition, the Project requests approval of a TOC Additional Incentive to calculate the maximum dwelling unit based on the lot area prior to street dedication. As shown in Table II 5 in Section II, the allowable base density is 232 dwelling units and a total of 419 dwelling units are allowed with an 80-percent density increase.

By providing 11 percent of the total units as Extremely Low Income Units as required by the TOC Guidelines, the Project is entitled to a floor area increase of 55 percent in the [Q]C4-2-CDO and [Q]R4-1 zoned portion and a 4.25 FAR in the [Q]C2-1-CDO zoned portion, which allows up to 420,201 square feet of floor area. Upon completion, the Project would result in a total floor area of approximately 420,201 square feet with a maximum FAR of 9.3:1 for the C4 parcels, 4.25:1 for the C2 parcels, and 4.65:1 for the R4 parcel. As part of the Project entitlements, a TOC Additional Incentive is requested to average floor area across the different zone designations. As shown in Table II-4 in Section II and in Table IV.F-1 on page IV.F-21 in the Regulatory Framework subsection above, the permitted base floor area per the underlying zoning is 251,289 square feet, and with an increase in FAR pursuant to the TOC program, 420,021 square feet is permitted.

As defined in LAMC Section 12.03, the Project Site is considered a Through Lot. The Detroit and Cloverdale frontages are designated front yards, and the Wilshire Boulevard and south frontage are designated side yards. No front yard is required for the portion of the Project Site located in the C4 and C2 zones. For the portion of the front yard along Detroit zoned R4, a 15-foot front yard is required and would be provided. No side yard is required along Wilshire Boulevard pursuant to LAMC Section 12.22 A.18. For the south frontage in the C2 and R4 zones, a 16-foot side yard is required. The Project requests a TOC Additional Incentive to permit the proposed 5-foot side yard in the C2 zone consistent with the RAS3 setbacks, and a 30 percent yard reduction for a 10 foot 4 inch setback in the R4 zone.

With the approval of these requests, the Project would not conflict with the applicable density, FAR, and setback restrictions.

(2) Open Space and Landscaping

LAMC Section 12.21 G requires open space for new developments with six or more dwelling units. The Project is required to provide a total of 47,475 square feet of open space. The Project would provide 47,534 square feet of open space including 11,868 square feet of common indoor open space, 14,716 square feet of common outdoor open space, and 20,950

³¹ Pursuant to Ordinance No. 165,331, Subarea 2124, density of market rate residential projects may not exceed the density of the R3 zone, which is 1 dwelling unit per 800 square feet of lot area per LAMC Section 12.10 C.4.

square feet of private open space including residential balconies and decks. The indoor common open space may include lounge areas, meeting room space, and a fitness center. As shown in Figure II-7 in Section II, Project Description, of this Draft EIR, outdoor open space would be comprised of a pool, seating areas, fitness areas, and deck areas primarily located on levels 6 (podium) and 43 (private roof top deck areas). Thus, the Project would meet the applicable open space requirements set forth by the LAMC.

(3) Conclusion

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

(iii) Citywide Design Guidelines

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

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

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

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

The Project would promote a safe, comfortable, and accessible pedestrian experience by implementing a design that would enhance the pedestrian environment. Specifically, the Project ground floor commercial space along Wilshire Boulevard and Cloverdale Avenue would include publicly accessible plazas and seating areas and would be designed to be highly visually permeable through the use of storefront glazing and high ceilings, thereby activating (i.e., sustaining street level interest, promoting pedestrian traffic, etc.) the streetscape and providing security. Along Cloverdale Avenue and Wilshire Boulevard, the Project would have the proposed retail and residential lobby screen the garage to activate the street front and to permit pedestrian connections for local residents. Additionally, the Project would provide 10 new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, bike racks, outdoor dining and seating areas, and landscaping. The Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night.

Furthermore, as provided in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would implement several Project Design Feature POL-PDF-2 to enhance safety within and immediately surrounding the Project Site including, but not limited to: implementing a 24-hour/seven-day a week security plan that includes a closed-circuit camera network controlled access to all buildings, on-site staff (including staff dedicated to monitoring the security cameras, etc.; providing security lighting of buildings and walkways as well as parking areas, elevators, and lobbies and designing building entrances, the spaces around buildings, and pedestrian walkways to be open and visible from surrounding sites.

Vehicular access to the Project Site would be provided via two, 30-foot-wide two-way driveways along Cloverdale Avenue and Detroit Street that would consolidate vehicular access to the south of the property and provide access to parking area. Primary pedestrian access to the Residential Tower would be provided along Cloverdale Avenue while primary pedestrian access to the commercial uses along Wilshire Boulevard would be along Wilshire Boulevard. Access to parking has been designed to be limited to the south portion of the property as much as possible to achieve a continuous pedestrian experience from Cloverdale Avenue and Wilshire Boulevard. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Pedestrian entrances would be designed in accordance with LADOT standards (including sight distance standards) and ADA requirements. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all. Therefore, the Project would not conflict with Citywide Design Guidelines 1 through 3.

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

As discussed in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is developed primarily with a mix of low- to high-rise commercial and residential uses. Uses located adjacent to the Project Site include two- to six-story buildings comprised of commercial and residential uses across Wilshire Boulevard to the north, two- and three-story residential buildings to the south, the Metro D Line Wilshire/La Brea Station under construction across Detroit Street to the east, and a two- and 10-story commercial building and surface parking to the west. There are also multiple existing and proposed mid- and high-rise towers in and just outside the Miracle Mile area located along Wilshire Boulevard, including the 12-story Wilshire Tower at 5514 Wilshire, 14-story Bank of American Building at 5420 Wilshire, 20-story Miracle Mile Tower at 5455 Wilshire, 27-story Citibank Boulding at 5670 Wilshire, 31-story SBE Building at 5900 Wilshire Boulevard, and a proposed 42-story tower (Mirabel Project) across Wilshire Boulevard from the Project Site at 5411 Wilshire which is currently in the environmental review phase.

The Project would be designed to be compatible with the general urban characteristics of the surrounding neighborhood. Specifically, the Residential Tower located within the southwestern portion of the Project Site and the proposed new parking facilities to support the existing and proposed uses would include 46 levels with a building height of approximately 530 feet. The Project would feature a contemporary architectural style that includes architectural elements already found on the Project Site and in the surrounding neighborhood. The contextually sensitive design would be achieved by combining density into a singular tower, locating retail and other active spaces along Cloverdale Avenue, and retaining the existing buildings with active commercial uses along Wilshire Boulevard. By setting back the tower, the main project mass would occur on the southwestern portion of the Project Site, limiting shadows on neighboring structures. In addition, the Residential Tower would feature clear glass, black carbon aluminum, and dark bronze features in a contemporary interpretation of Art Deco style that would respect the eclectic and historic nature of Miracle Mile's architectural significance and urban design through the use of symmetry, layering of vertical and geometric lines, and repeated patterns.

Furthermore: the Project would include design elements that reinforce orientation to the street, such as a glass façade with a well-defined, easily recognizable main canopied entrance; and the proposed architectural features that would provide vertical and horizontal rhythm from the ground to the crown of the tower were inspired by the Miracle Mile's CDO goals of "preserving the unique Art Deco character" of the historic buildings along Wilshire;

Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. Thus, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The Project would be designed to relate contextually to its immediate neighborhood as well as Miracle Mile as a whole by: (1) featuring a modern/contemporary interpretation of Art Deco, including the proposed pointed, vertical piers that would extend from the ground to the crown and materials detailing inspired heavily by the Art Deco movement; and (2) stepping back the podium and tower from the adjacent streets and the existing adjacent uses to the south to soften the impact of the Project's mass and height in relation to the surrounding buildings. As previously discussed, the Project would combine density into a singular tower, locate retail and other active spaces along Cloverdale Avenue and retain the existing buildings with active commercial uses and an active streetscape along Wilshire Boulevard, thereby providing context and linkages between the Project Site and the surrounding neighborhood. In addition, the Residential Tower would feature clear glass, black carbon aluminum, and dark bronze features in a contemporary interpretation of Art Deco style that would respect the eclectic and historic nature of Miracle Mile's architectural significance and urban design through the use of symmetry, layering of vertical and

geometric lines, and repeated patterns. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. Therefore, the Project would be consistent with Citywide Design Guideline 5.

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

On the ground level, the project's residential lobby, lounge, short term bike parking, restaurants and retail would help energize the Project's street frontages. As previously discussed, the Project would also provide new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, bike racks, outdoor dining and seating areas for the proposed restaurant uses, and landscaping, thereby providing a more comfortable pedestrian experience. The indoor common open space may include lounge areas, meeting room space, and a fitness center. Outdoor open space would be comprised of a pool, seating areas, fitness areas, and deck areas primarily located on Levels 6 (podium) and 43 (private roof top deck areas). Furthermore, as discussed in Section II, Project Description of this Draft EIR, Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site to provide for efficient and effective lighting solutions that minimize light trespass from the Project Site. Thus, the Project would not conflict with Citywide Design Guideline 6.

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

As discussed above, vehicular traffic and pedestrian activity would be separated by new street trees, tree wells, and shrub-planted landscaping, while the proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, sight distance, etc. and would incorporate pedestrian warning systems, as appropriate. Additionally, pedestrian entrances would be designed in accordance with LADOT standards and ADA requirements. The Project would also include lighting along the building and pathways to provide for pedestrian orientation. Furthermore, by limiting vehicular access to the south portions of the Project Site and locating parking above and below ground, site users and non-Project-related pedestrians walking along the Project Site street frontages would be further protected. Lastly, by providing outdoor open space amenities for Project residents on the Level 6 podium/pool deck and the rooftop deck, the Project would separate residential recreational activities from local traffic. Thus, the Project would not conflict with Citywide Design Guideline 7.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project would be designed and constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, CALGreen, and the California Building Energy Efficiency Standards. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to, water conservation features that include the use of native plants, passive cooling strategies, Energy Star-labeled appliances, a bicycle-friendly site design, and waste reduction features. Furthermore, the Project would comply with applicable City and 2025 CALGreen EV charging requirements. Specifically, the Project would be required to provide Level 2 EV charging receptacles in 373 residential parking spaces and in 3 commercial parking spaces. An additional 13 commercial parking spaces are required to be EV ready capable of supporting future EVSE. Lastly: (1) the window wall at the tower would be inset from the building walls to regulate direct sunlight and cut down on solar gain fluctuations; (2) awnings and aluminum louvers above the west-facing windows would be provided to reduce heat gain and glare; (3) the selection of the landscape palette and trees at the Project's open spaces would facilitate activity in different seasons and weather conditions allowing for sunny, wind-protected areas for use in the winter and shaded zones for use in the summer; and (4) the above-grade parking would be screened such that it would allow for natural cross-ventilation but block any glare from car headlights and interior building lighting. Overall, the Project would be consistent with Citywide Design Guideline 9.

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

As discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would comply with the City's LID Ordinance and manage stormwater through a capture and use system and/or biofiltration planters which would capture stormwater runoff from the roof and surface drains for feeding new landscaped areas around the Project Site and/or flow through biofiltration areas before being discharged into the City's stormwater drainage system. Therefore, the Project would not conflict with Citywide Design Guideline 10.

(iv) Miracle Mile CDO

The Miracle Mile CDO Zone Change Ordinance (Ord. No 176,332) applies to the portions of the Project Site zoned [Q]C4-2-CDO and [Q]C2-1-CDO. The ordinance does not apply to the [Q]R4-1 zoned portion of the Project Site.

The Project's general consistency with the applicable goals and guidelines set forth in the Miracle Mile CDO is discussed in Table 6 of Appendix F of this Draft EIR. As detailed therein, the Project would specifically contribute to the Miracle Mile CDO District goals by promoting a development that preserves and enhances the physical appearance of the Wilshire corridor, contributes to the District's unique historical context, encourages development that adds to a pedestrian-friendly environment, includes a development with a high degree of design quality, and preserves architecturally significant buildings. The Project would contribute to the achievement of these goals by providing for the development of a new high-rise mixed-use development that would be compatible in scale and character to buildings in the vicinity of the Project Site. Furthermore, as concluded in Section IV.B, Cultural Resources, of this Draft EIR, while the Project would introduce new visual features to the area, the historic significance and integrity of the nearby historical resources that are contributors to the Miracle Mile Historic District would not be significantly impacted. Further, as previously discussed, the Project would retain the existing buildings that are contributors to the Miracle Mile Historic District. With applicable regulations and implementation of Project Design Feature CUL-PDF-1 requiring an HSR, all aspects of historic integrity associated with the on-site contributors would remain and ensure compliance with Section 7 of the Standards & Guidelines of the Miracle Mile CDO District.

The Project would provide frontage improvements, new street trees, and sitting areas along the Project's street frontages (especially along Wilshire Boulevard which would include restaurants with outdoor seating), and would provide highly-visually permeable ground floor commercial space along Cloverdale Avenue, thereby encouraging a pedestrian friendly retail environment that is easily accessible. In addition, as detailed in Table 6, the design of the Project would generally not conflict with the relevant design guidelines of the Miracle Mile CDO District. Therefore, the Project would not cause a significant environmental impact due to a conflict with the applicable goals of the Miracle Mile CDO adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Conclusion

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, a total of five related development projects have been identified in the vicinity of the Project Site through 2029, the Project's anticipated buildout year. The related projects comprise a variety of uses, including residential, commercial, hotel, and office uses, as well as mixed-use developments incorporating some or all of these elements. The nearest related projects to the Project Site are Related Project No. 5, the Metro D Line extension, and Related Project No. 1, the Mirabel Transit Priority Project (a high-rise mixed-use residential Project) currently in the environmental review phase across Wilshire Boulevard from the Project Site.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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