

IV. Environmental Impact Analysis

G. 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 land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Specifically, Section IV.A, Air Quality, of this Draft EIR, evaluates consistency with the South Coast Air Quality Management District's Air Quality Management Plan and the City of Los Angeles General Plan's Air Quality Element; and Section IV.E, Greenhouse Gas Emissions, of this Draft EIR evaluates consistency with the State's climate change scoping plans. Additionally, although an analysis is provided below, Section IV.I, Transportation, of this Draft EIR includes a more detailed consistency analysis of Mobility Plan 2035 (Mobility Plan), California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2024–2050 RTP/SCS), and other plans applicable to the transportation network.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- Senate Bill 743
- Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Central City North Community Plan

- Los Angeles Municipal Code
- Citywide Design Guidelines
- River Improvement Overlay

(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 for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety, and environmental justice for those jurisdictions that include disadvantaged communities including the City.

(b) Senate Bill 375

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

(c) Senate Bill 743

In September 2013, Governor 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.
- “Employment center project” means a project located on property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and that is located within a transit priority area.

PRC Section 21064.3 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.”

The Project Site is located within infill site since it is located in an urban area with the entire perimeter of the Project Site adjoining parcels that are developed with qualified urban uses, or is separated only by an improved public right-of-way from use qualified urban uses. Moreover, the Project Site is located within a designated TPA according to the City of Los Angeles’ Zone Information and Map Access System (ZIMAS) since it is located within 0.5 miles of major transit stops, including within 0.15 miles southwest of the Metro A Line Chinatown Station. Lastly, the Project qualifies as an employment center under PRC Section 21099 since the Project Site’s zoning allows commercial uses with an FAR of no less than 0.75:1 and since the Project Site is located within a TPA. Therefore, the Project’s aesthetic and parking impacts are not considered significant impacts on the environment per SB 743.

(2) Regional

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

SCAG is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as an MPO and under state law, 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 sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality management plans.

On April 4, 2024, SCAG's Regional Council adopted the 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 (TAZ). Projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling, and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. These projections are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG's core responsibilities and on the requirements of comprehensive regional transportation planning integrated with the development of an SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The 2024–2050 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.

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

within PDAs, providing sufficient housing opportunities, developing 15-minute communities, and fostering equitable decision-making as the framework for implementing the Regional Planning Policies.

The 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),¹ Livable Corridors,² TPAs, and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also High Quality Transportation Corridors (HQTCs).³

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),⁴ originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future

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

² 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 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.

³ 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.

⁴ City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed August 4, 2025.

development of the City, while integrating a range of state-mandated elements,⁵ 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. No housing exists on the Project Site, and the Project does not propose housing. As such, no discussion of the Housing Element is provided below.

(i) Framework Element

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

(1) Land Use Chapter

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

⁵ 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).

(2) 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.⁶ 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.

(3) 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.

(4) Economic Development Chapter

The Framework Element's Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The Economic Development Chapter also establishes mutual development objectives for land use and economic development. The Economic Development Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Economic Development Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated

⁶ *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

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.

(5) 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.

(6) Infrastructure and Public Services Chapter

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

(ii) Mobility Plan 2035

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

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

- Safety First;
- 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) 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.⁷ 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

⁷ *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, 2015.*

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.
- Reduce exposure to second-hand smoke by promoting smoke-free environments and markets and support public, private, and nonprofit cessation programs and services.
- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.
- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

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

(v) Central City North Community Plan

The City's Central City North Community Plan (Community Plan), adopted on December 15, 2000, is the land use element of the General Plan applicable to the Central City North Community Plan Area, which is adjacent to Downtown Los Angeles and bounded by the Los Angeles River to the east; the City of Vernon to the south; Alameda Street, Cesar Chavez Avenue, Sunset Boulevard, and Marview Avenue to the west; and Stadium Way, Lilac Terrace, and North Broadway to the north. 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. Last updated in 2000, the Community Plan was developed in the context of promoting a vision for the Community Plan area as a community that preserves and enhances the positive characteristics of existing residential

neighborhoods, while providing a variety of housing opportunities with compatible new housing; improves the function, design, and economic vitality of the commercial corridors; preserves and enhances the positive characteristics of existing uses, which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximizes the development opportunities of future transit systems, while minimizing any adverse impacts; and plans the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Community Plan area. As shown in Figure IV.G-1 on page IV.G-12, the Community Plan's land use designation for the Project Site is Regional Commercial, as further discussed below.

On May 3, 2023, the City Council adopted the first reading of the Downtown Community Plan Update (DTLA 2040) Plan, which is a combined update to the Central City and Central City North Community Plans. The City Attorney will review and finalize the implementing ordinances to ensure clarity of regulations and consistency with State law. After the City Attorney review process is complete, the City Council will consider and vote on the DTLA 2040 Plan implementing ordinances, which if adopted, will then go into effect. Until that time, the Central City North Community Plan is still the operative land use document for the Project Site. Therefore, DTLA 2040 is not applicable to the Project or Project Site.

(b) Los Angeles Municipal Code

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

As shown in Figure IV.G-2 on page IV.G-13, the Project Site is zoned as [Q]C2-2-RIO and [T][Q]C2-2-RIO (Qualified Classification, Heavy Industrial, Height District 2, River Improvement Overlay District; and Tentative Zone Classification, Qualified Classification, Heavy Industrial, Height District 2, River Improvement Overlay District, respectively). The C2 zone allows for a wide range of commercial land uses, including, but not limited to, the Project's proposed office, restaurant, and retail uses. Height District No. 2 allows a 6:1 floor area ratio (FAR) and does not limit building height; however, the Project Site's "Q" Condition in Ordinance No. 163,510, which applies to the eastern portion of the Property, and Ordinance No. 164,855, which applies to the western portion of the Property, limits the FAR for commercial projects to 1.5:1. The "T" Condition in Ordinance No. 163,510 identifies certain on- and off-site improvement requirements that were imposed as part of, and specific to, a proposed hotel development that was never built, associated with City Planning Case Nos. CPC-1987-350-ZC, ZA-1986-974-CUB, and MND-86-441-CUZ-CU-ZV. The "2" in the Project Site's zoning designation refers to the Project Site's location in Height District 2. All

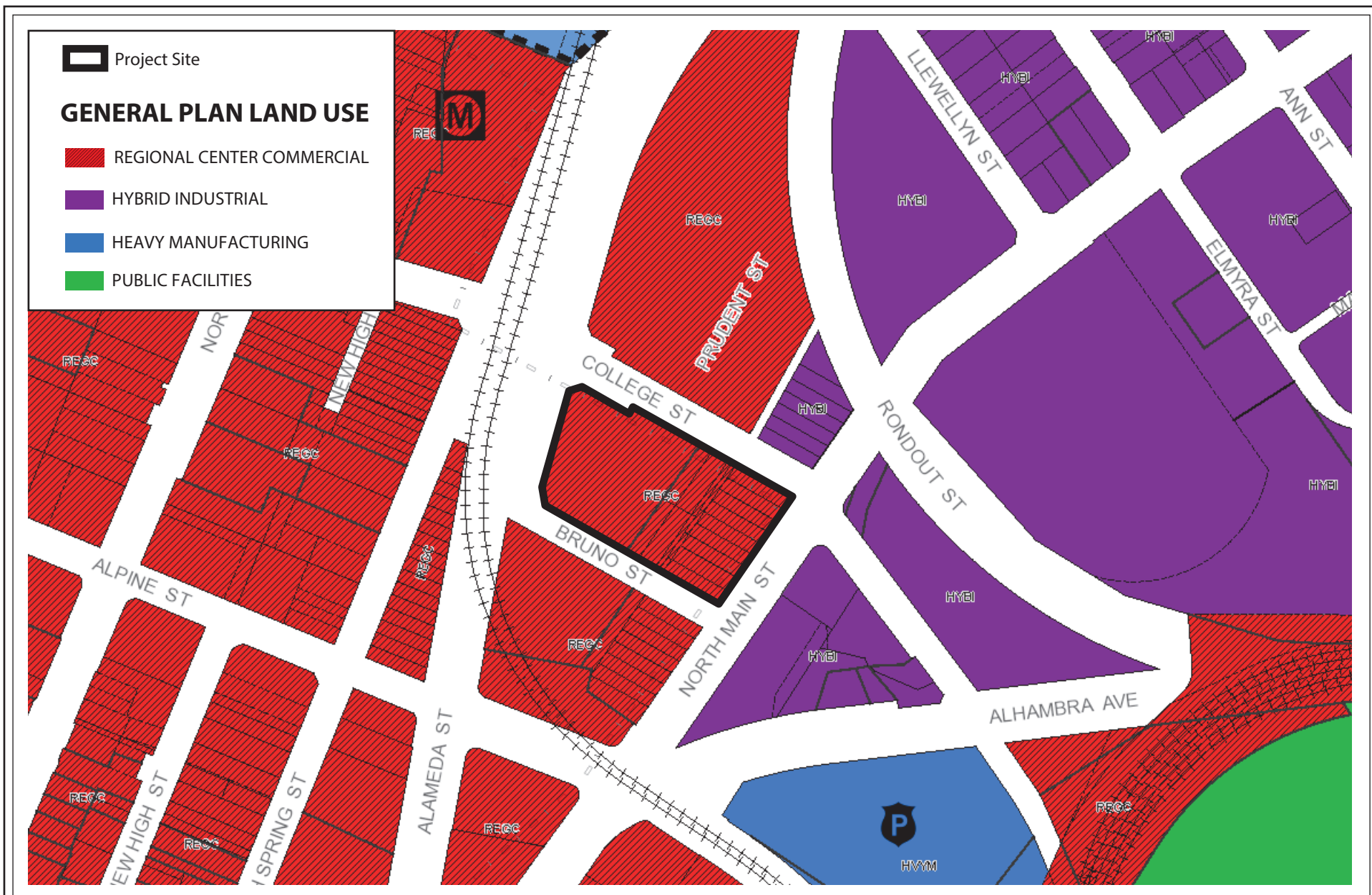


Figure IV.G-1
Land Use Designation on the Project Site

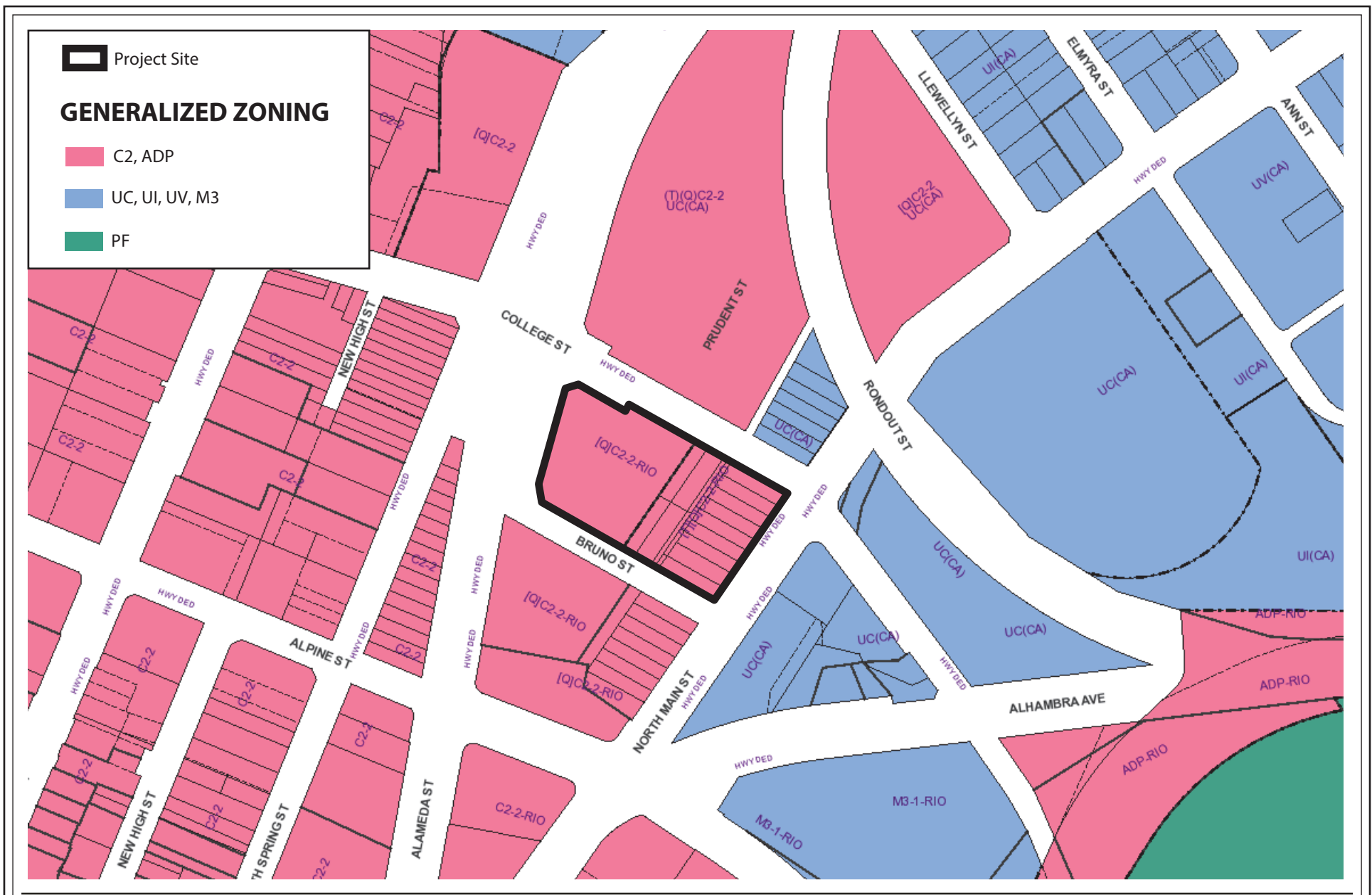


Figure IV.G-2
Zoning Designations on the Project Site

uses located in the C2 zone and within Height District 2 are restricted to a maximum FAR of 6 times the property's buildable area.⁸ However, as noted above, the Project Site's "Q" in the zoning designation (Ordinance Nos. 163,510 and 164,855) limits the maximum FAR for commercial developments at 1.5:1 FAR. Height District 2 does not impose a vertical height limitation on the Project Site.

The "RIO" in the Project Site's zoning designation refers to the Project Site's location in the Los Angeles River Improvement Overlay Zone. The RIO does not impose any use, FAR, height, or setback restrictions or standards. Pursuant to LAMC Section 13.17, projects in the Los Angeles River's Outer Core that are not adjacent to the river, including the Project, are required to comply with various screening standards and utilize native California plant species in all landscaped areas.

(c) Citywide Design Guidelines

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

(d) River Improvement Overlay

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.

⁸ FAR and height restrictions can be found at LAMC Section 12.21.1.A.1.

Effectuated by Ordinance No. 183,145 in August 2014, the RIO District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable development regulations and design guidelines. The purposes of the RIO District are to support the goals of the Los Angeles River Revitalization Master Plan (LARRMP); contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle, and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site but there is a billboard, lighting, a shipping container, six electric bus chargers, and fencing. The Project Site is relatively flat. There are no trees on the Project Site. There are two street trees adjacent to the Project Site, both of which are located along Alameda Street. The two street trees consist of non-native species. Neither one of the street trees is "significant" or considered a protected tree as defined by the City of Los Angeles Protected Tree and Shrub Regulations (Ordinance No. 186,873). As noted above, the Project Site is designated as Regional Commercial and is zoned as [Q]C2-2-RIO and [T][Q]C2-2-RIO (Qualified Classification, Commercial Zone, Height District 2, River Improvement Overlay District; and Tentative Zone Classification, Qualified Classification, Commercial Zone, Height District 2, River Improvement Overlay District, respectively). The Project Site is located within a City-designated TPA and SCAG-designated HQTC.

(2) Surrounding Uses

The area surrounding the Project Site is urbanized and includes a mix of low to mid rise buildings containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned C2, which is consistent with the zoning of the Project Site. The area directly north of the Project Site, across College Street, includes several parcels zoned as (T)(Q)C2-2-UC(CA) and UC(CA) that are developed with a surface level parking lot with proposals for future mixed-use development and an existing low-rise industrial building, respectively. The area to the east of the Project Site, across Main Street, are additional properties zoned as UC(CA) that include existing industrial buildings and a

multi-level self-storage facility. The area to the west of the Project Site, across Alameda Street, is zoned as C2-2 and comprised of the Metro Light Rail Overpass, which includes the Metro A Line Chinatown Station, along with office and residential developments. The area to the south of the Project Site is zoned as [Q]C2-2-RIO, and includes additional industrial buildings and another surface parking lot. Additionally, the Granite Block Paving, City Historic Cultural Monument (HCM) #211, is located on Bruno Street adjacent to the Project Site.⁹

3. Project Impacts

a. Thresholds of Significance

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

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

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

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 with regard to Threshold (a) and the Project's potential to physically divide an established community. For Threshold (b), the Appendix G Threshold listed 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 questions

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts related to land use consistency:

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

⁹ The historical road segment known as the Granite Paving Block (HCM No. 211) was originally designated as an HCM on March 7, 1979. The designation recognizes the significance as a rare example of hand-hewn granite block paving dating from the early 1900s in Los Angeles.

b. Methodology

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

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

An analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be consistent with a plan’s overall goals and objectives but need not be in perfect conformity with every plan policy. 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.¹⁰

c. Project Design Features

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

¹⁰ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

d. Analysis of Project Impacts

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project Site is currently developed with asphalt surface parking, a billboard, lighting, a shipping container, and fencing. The Project would replace the existing surface parking with a new commercial building comprised of office, restaurant, and retail uses. These uses would be consistent with the adjacent uses in the community. In addition, access to the adjacent streets and properties would be maintained throughout construction and operation. Furthermore, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established 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 conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) SCAG 2024–2050 RTP/SCS

The Project's potential to conflict with the applicable goals set forth in the 2024–2050 RTP/SCS is analyzed in Table 1 of Appendix G of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2024–2050 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project would increase urban density on an urban infill site located within an HQTIC and is served by a variety of nearby mass transit options, including several bus lines and the Metro A Line Chinatown Station. The Project Site is also located approximately 0.5 miles north of Union Station which provides regional rail connections. Furthermore, as discussed in Section IV.I, Transportation, of this Draft EIR, the Project would implement a transportation demand management (TDM) program to promote non-automobile travel, such as biking, and reduce the use of single-occupant vehicle trips with a comprehensive program of design elements, public transportation services, education programs, and incentive programs. In addition, the Project would provide bicycle parking spaces, lockers, and showers for the proposed uses

that would serve to promote the use of bicycles. The Project also includes adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. The Project would also comply with all design element requirements, including proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design that does not hinder sight distance, mobility, or accessibility, to minimize effects on the public rights-of-way, which would enhance transportation safety. Furthermore, the Project's streetscape improvements and bicycle facilities would enhance the public right-of-way (ROW) and help facilitate pedestrian and bicycle accessibility to improve the safety and mobility of all users. As such, the Project would support mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking.

(b) Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the applicable goals, objectives, and policies of the General Plan, including the Framework Element, the Mobility Plan, the Conservation Element, and the Health and Wellness Element; the Central City North Community Plan; the LAMC; the Citywide Design Guidelines; and the RIO District.

(i) Los Angeles General Plan

(1) Framework Element

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

(a) Land Use Chapter

The Project would support and would be consistent with the Framework Element's Land Use Chapter as it would contribute to the needs of the City's existing and future residents, businesses, and visitors by providing new office, retail, and restaurant uses totaling 234,601 square feet.¹¹ In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution, while

¹¹ The Project would also include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis.

supporting the City's objective to encourage new retail, restaurant, and office uses along primary transit corridors/boulevards. Additionally, by adding ground-floor retail and restaurant space, as well as new landscaping, the Project would promote a pedestrian-friendly environment. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

(b) Open Space and Conservation Chapter

Although the LAMC does not require commercial and office developments to provide open space, the Project would nonetheless provide landscaping and outdoor areas to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide useable outdoor areas on-site. The Project would provide approximately 52,716 square feet of outdoor areas on-site, including 33,776 square feet of hardscaping and 18,940 square feet of landscaping, 14,551 square feet of which would be publicly accessible on the ground floor. Additionally, the Project would provide approximately 13,575 square feet of outdoor space within the public right-of-way, of which 11,217 square feet would be hardscaping, and 2,358 square feet would be landscaping at the sidewalk areas adjacent to the Project Site. In total, the Project would provide approximately 28,126 square feet of publicly-accessible hardscape and landscape area on- and off-site.

The Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site. Specifically, the Project would include new landscaping along North Alameda Street, West College Street, North Main Street, and Bruno Street. These perimeter areas would include landscaping, such as street trees and shrubs. In addition, the Project would include a landscaped amenity terrace at the second level of the office building, which would create a building break, create a connection between the office levels above the podium, and provide ample outdoor areas for use by employees. The Project would also include a landscaped amenity terrace at the fourth level of the office building. Additionally, a portion of the terraces provided on Level 3 through 5 facing Bruno Street would be covered.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter.

(c) Economic Development Chapter

The Project would support the City's objective to establish a balance of land uses through the development of office, retail, and restaurant uses in an area well-served by public transit and in close proximity to existing residential and other commercial uses. The proposed office, retail, and restaurant uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Community Plan area, provide amenities to meet the needs of local residents, and serve to

reduce VMT by locating jobs in an area well served by public transit. Thus, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Economic Development Chapter.

(d) Infrastructure and Public Services Chapter

The Project would support the City's policy and objectives pertaining to effective and efficient approaches to protecting water quality by implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as required by the City's Low Impact Development (LID) Ordinance. Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Furthermore, as discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Los Angeles Department of Water and Power (LADWP) would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. In addition, as discussed in the Initial Study included as Appendix A of this Draft EIR, of this Draft EIR, the Project would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB), and the Los Angeles Sanitation Bureau (LASAN) determined that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Infrastructure and Public Services Chapter.

(e) Conclusion

Based on the analysis above, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element.

(2) Mobility Plan

The Project's potential to conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 3 of Appendix G of this Draft EIR.

In summary of Table 3, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1 that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets

and highways. The Project would ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

During operation, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access, as well as bicycle facilities. Specifically, the Project would provide approximately 440 vehicle parking spaces within one subterranean level, one ground level, and one above ground (mezzanine) level (the at-grade and above-grade parking levels would be wrapped with active ground floor commercial uses along the Alameda Street, Bruno Street, and Main Street frontages and screened with timber battens along College Street). The Project would also provide 149 bicycle parking spaces (i.e., 123 long-term and 26 short-term) in excess of LAMC requirements, along with lockers and showers. Further, as noted above, the Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Specifically, the Project would include new landscaping along North Alameda Street, West College Street, North Main Street, and Bruno Street. These perimeter areas would include landscaping, such as street trees and shrubs. In addition, the Project would include a landscaped amenity deck at the second level of the office building, which would create a building break, create a connection between the office levels above the podium, and provide ample outdoor areas for use by employees. Furthermore, as discussed in Section IV.I, Transportation, of this Draft EIR, the Project would implement a TDM program to promote non-automobile travel, such as biking, and reduce the use of single-occupant vehicle trips with a comprehensive program of design elements, public transportation services, education programs, and incentive programs. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan.

(3) Conservation Element

As identified in Subsection 2.a.(3)(a)(iii) on page IV.G-9, 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 potential to conflict with the Conservation Element is analyzed below.

As discussed in the Initial Study included in Appendix A of this Draft EIR, the Project Site is located in an urbanized area and is currently developed with asphalt surface parking a billboard, parking lights, cargo storage container, and fencing. There is no landscaping within the Project Site, though two street trees are located on N. Alameda Street adjacent to the Project Site. The two street trees are not protected under the City's Protected Tree and Shrub Regulations (Ordinance No. 186,873), but would nevertheless be retained as part

of the Project.¹² As also discussed in the Initial Study included as Appendix A of this Draft EIR, due to the improved nature of the Project Site and the surrounding areas and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

As discussed in the Initial Study included as Appendix A of this Draft EIR, no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.^{13,14} 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.¹⁵ Since the Project is located within an urban area, as detailed in Section II, Project Description, of this Draft EIR, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site, which provide linkages to natural open space areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the immediate vicinity of the Project Site.

With respect to historic resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the Granite Block Paving, City HCM #211, is located on Bruno Street adjacent to the Project Site.¹⁶ The Project does not include the permanent demolition, destruction, relocation, or alteration of this historic resource. However, as discussed in

¹² Pursuant to City Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: oak tree, Southern California black walnut tree, western sycamore tree, California bay tree, Mexican elderberry shrub, and toyon shrub.

¹³ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

¹⁴ United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed August 14, 2025.

¹⁵ United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed August 14, 2025.

¹⁶ The historical road segment known as the Granite Paving Block (HCM No. 211) was originally designated as an HCM on March 7, 1979. The designation recognizes the significance as a rare example of hand-hewn granite block paving dating from the early 1900s in Los Angeles.

Section IV.B, Cultural Resources and Section IV.I, Noise, of this Draft EIR, construction vibration levels would exceed the significance threshold applicable to this resource. Implementation of Mitigation Measure CUL-MM-1 (temporary removal, storage, and reinstallation of the historic pavers immediately adjacent to the Project Site to allow for the installation of a shoring system to mitigate vibration impacts to the resource) would reduce the Project's impact to this designated historical resource to the extent feasible while maintaining its historic integrity. However, as discussed in Section IV.I, Noise, of this Draft EIR, while construction logistics have been designed to work around the resource to the extent feasible, on-site construction vibration would exceed the significance criterion for the historic resource and no additional feasible mitigation has been identified. As discussed therein, in order for vibration levels to be reduced to a less than significant level, a 20-foot setback from the historic resource would be required. This is infeasible because construction would involve work up to the property line. Other mitigation measures considered to reduce vibration impacts included the installation of a wave barrier, which is typically a trench, or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. The temporary removal, storage, and reconstruction of the entire resource, not just the pavers immediately adjacent to the Project Site to allow for the installation of a shoring system, was also considered. This was determined to be infeasible because: (1) it is unknown how many of the pavers would remain intact and removal of the entire resource could result in a substantial adverse change to the extent that its integrity as a historic resource may be impaired; (2) the subsurface conditions under the pavers are not known and as a result, secondary impacts may result as a result of additional construction that may be needed in order to bring the street up to modern standards; (3) this process would require the long-term closure of Bruno Street, which would disrupt adjacent businesses, pedestrian and bicycle access, and vehicle traffic, including emergency vehicle access; and (4) the additional time required to complete this process would extend construction considerably, thus extending the amount of time the surrounding community is exposed to the Project's construction impacts. Therefore, impacts with respect to historical resources would remain significant and unavoidable. Consequently, Project construction would not be fully consistent with the City's objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element. However, as discussed above, under the *Sequoyah Hills Homeowners Association v. City of Oakland* court case, a Project is not required to be an exact match to the objectives and policies of the General Plan to not pose a conflict.

(4) Health and Wellness Element

The Health and Wellness Element includes a policy to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health. The Project is near transit, including numerous bus lines and the Metro

A Line and would include TDM measures to reduce VMT. In addition, the Project would encourage alternative transportation choices by improving the pedestrian experience on adjacent streets and providing 149 bicycle parking spaces on-site in excess of LAMC requirements. As such, the Project would support the Health and Wellness Element's efforts to reduce vehicle use through implementation of smart growth mixed land use patterns, which would support the reduction of air pollution. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

(5) Central City North Community Plan

As discussed above in Subsection 2.b.(1) on page IV.G-15, the Project has a land use designation of Regional Commercial. The Applicant has requested a General Plan Amendment to amend Central City North Community Plan Footnote No. 7 to allow the FAR for commercial development at the Project Site to exceed 1.5:1. The Applicant has also requested a Vesting Zone and Height District Change to change the zoning for the Project Site from [Q]C2-2-RIO and [T][Q]C2-2-RIO to C2-2D-RIO to allow for the proposed approximately 2.42:1 FAR in-lieu of the 1.5:1 FAR otherwise permitted. The Project's potential to conflict with the objectives and policies set forth in the Community Plan is discussed in detail in Table 4 of Appendix G of this Draft EIR. The following is a summary of that discussion.

The Project would not conflict with the objectives and policies that support the goals of the Community Plan. The Project would support the Community Plan's objective to improve the function, design, and economic vitality of the commercial corridors within the Community Plan area by redeveloping an underutilized site into a high-density commercial development. The Project would also support the Community Plan's objective to conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services. Additionally, the Project would provide a mix of office, retail, and restaurant uses in an area that is near public transportation and other commercial and residential uses which would support the Community Plan's goal of reducing vehicular trips as multiple local and regional bus lines are located in the vicinity of the Project Site. Specifically, the Project Site is located within 0.15 miles of the Metro A Line Chinatown Station located directly across the street from the Project Site on the Northwestern corner of the intersection of West College Street and North Spring Street. The Project Site is also located in close proximity to stops for Metro Lines 70 and 76, the DASH Lincoln Heights/Chinatown Route, DASH Downtown Routes A, B, D, and E, and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located approximately 0.5 miles north of Union Station along Alameda Street, which is a hub for all major public transit lines for the region.

Additionally, the Project would improve the pedestrian experience, function, and design of the Project Site with new ground floor retail and restaurant uses which would help to activate the Project Site and surrounding area. Further, as noted above, the Project would enhance the pedestrian experience by providing new landscaping along North Alameda Street, West College Street, North Main Street, and Bruno Street. These perimeter areas would include landscaping, such as street trees and shrubs. The Project would also include outdoor amenities such as a publicly accessible street plaza and garden, which would both be located on the ground floor. The street plaza would be located on the corner of North Alameda Street and West College Street. The street plaza would include an entrance to the Project, outdoor seating, a raised planter, and bicycle parking. The garden would be located near the entrance of the Project along Bruno Street with egress stairs, raised planters, and architectural screening. These improvements would promote linkages with the surrounding area and enhance the pedestrian experience. The Project would additionally support the economic vitality of the Community Plan Area by introducing new office, retail, and restaurant uses, which would complement the employment base in Downtown..

Therefore, with approval of the requested entitlements, as described above and in Section II, Project Description, of this Draft EIR, the Project would not conflict with the goals, objectives, and policies set forth in the Community Plan.

(ii) Los Angeles Municipal Code

As discussed above in Subsection 2.b.(1) on page IV.G-15, the Project Site has a General Plan land use designation of Regional Commercial and is zoned as [Q]C2-2-RIO and [T][Q]C2-2-RIO (Qualified Classification, Heavy Industrial, Height District 1, River Improvement Overlay District) (Tentative Zone Classification, Qualified Classification, Heavy Industrial, Height District 1, River Improvement Overlay District).

For purposes of FAR under the LAMC, the Project proposes 232,802 square feet of new uses. Specifically, the Project would redevelop the existing surface parking lot with 224,597 square feet of office uses, 4,095 square feet of restaurant uses (see footnote 18), and 4,110 square feet of retail uses, resulting in an FAR of approximately 2.42:1.¹⁷ To fully accommodate the Project's proposed intensity and proposed range of uses, pursuant to LAMC Sections 12.32-F and 12.32-A, a Vesting Zone and Height District Change to change the zoning for the Project Site from [Q]C2-2-RIO and [T][Q]C2-2-RIO to C2-2D-RIO to allow for the proposed approximately 2.42:1 FAR in-lieu of the 1.5:1 FAR otherwise permitted. The

¹⁷ As discussed in Section II, Project Description, of this Draft EIR, the Project would also include approximately 1,799 square feet of outdoor uncovered dining area (adjacent to the 4,095-square-foot ground floor restaurant), which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of the environmental analysis elsewhere in this Draft EIR, with the total square footage analyzed equaling 234,601 square feet.

Project is also requesting a Main Conditional Use Permit for Alcohol for the sale of a full-line of alcohol beverages for on-site and off-site consumption for up to three (3) establishments in connection with the proposed restaurant and retail spaces; a Site Plan Review for a development which creates, or results in an increase of, 50,000 gross square feet or more of nonresidential floor area; and a Vesting Tentative Tract Map to merge the existing lots and re-subdivide into one (1) ground lot and 16 airspace lots, and approve a haul route for 67,791 cubic yards of soil export.

With approval of the requested discretionary actions, the Project would not conflict with the applicable zoning provisions of the LAMC.

(iii) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be 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 3: Design projects to actively engage with streets and public space and maintain human scale.

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

The Project would improve the pedestrian experience through the introduction of new ground floor retail and restaurant uses, which would help to activate the Project Site and surrounding area. Furthermore, the Project would create an inviting pedestrian environment by providing new landscaping, consisting of street trees and shrubs, along North Alameda Street, West College Street, North Main Street, and Bruno Street. In addition, the Project would include a landscaped amenity terrace on the second level of the office building, which would create a building break, establish a connection between the office levels above the podium, and provide ample outdoor areas for use by employees. The Project would also include a landscaped amenity terrace at the fourth level of the office building. Furthermore, the proposed height and massing of the building as well as the proposed office, retail and restaurant uses would be consistent with the surrounding low- to mid-rise buildings and land uses surrounding the Project Site. The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. Building security would also enhance local pedestrian safety. The Project would also include a passenger drop-off and pick-up area along Bruno Street, which would be separated from the proposed vehicular access points and further

enhance pedestrian safety. These Project elements would promote a safe, comfortable accessible pedestrian experience for all; actively engage with the surrounding streets and public space; maintain a human scale; recognize and respect the surrounding context; and, provide amenities that support community building and provide an inviting and comfortable user experience.

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

Vehicular access to the Project Site would only be provided through two driveways which would be located along West College Street and conform to City of Los Angeles Department of Transportation (LADOT) standards. The driveway closer to the western section of the Project Site along West College Street would be exclusively for loading access, while the other driveway would be the only entrance that would serve to access the Project's parking garage. A passenger drop-off and pick-up area would also be provided along Bruno Street, which is designed to preserve the Granite Block Paving (HCM #211) along Bruno Street consistent with City Planning policy.¹⁸

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

The Project's architectural concept is a series of cascading terraces that recede into the Project Site from the Bruno Street frontage; each terrace would provide more open-air exposure as the building increases in height. The Project's design is based on principles of smart growth and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit.¹⁹ The Project would incorporate features to support and promote environmental sustainability. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. Such features would include weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; storm water capture; pedestrian-first design, employment and commercial activity center near various public transit stops, use of daylighting where feasible; and energy-efficient lighting. The building

¹⁸ A City Planning memorandum to the City's Department of Public Works, dated August 14, 2007, states that: "Under no circumstances, is the granite paving to be removed or covered in asphalt."

¹⁹ SCAG considers smart growth to be a range of development and conservation strategies that help protect the natural environment and make communities more attractive, economically stronger, and more socially diverse. A balance is sought between economically prosperous, socially equitable, and environmentally sustainable community development. SCAG, *Connect SoCal Final Program EIR*, May 2020, <https://scag.ca.gov/program-environmental-impact-report-0>, accessed August 11, 2025.

design incorporates many sustainable features, including optimal solar orientation of the facades, façade designs to minimize solar heat gain while optimizing daylight, access to open areas and natural ventilation, solar PV ready rooftops, efficient systems, and low water consumption.

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would reduce the amount of impervious surfaces on the Project Site and thus reduce the quantity of stormwater runoff. While the Project Site does not currently have structural best management practices in place to treat stormwater runoff, the Project would result in an improvement in the quality of stormwater runoff by complying with LID requirements. Specifically, the Project would be required to provide at least the equivalent of eight percent of the Project Site with landscaping or biofiltration plants for treating the runoff water. The Project would implement a capture and reuse system by collecting and conveying the runoff from the Project Site to two pretreatment devices and below-grade storage tanks and reusing the water for irrigation.

(iv) River Improvement Overlay District

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establish best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies specifically address river-adjacent development. Although the Project is located within the boundaries of the RIO District, the Project Site is located approximately 0.4 miles west of the Los Angeles River and separated from the Los Angeles River by numerous buildings, streets, and rail lines. Nevertheless, the Project would further the relevant objectives, including employing high quality, attractive and distinguishable architecture (Objective 2) and minimizing the quantity and appearance of parking and loading areas by ensuring all parking and loading areas are screened from public view (Objective 4). The Project would also comply with LAMC Section 13.17 which requires projects in the Los Angeles River's Outer Core to meet various screening standards and include native plant species. Therefore, the Project would not conflict with the RIO District.

(c) Conclusion

Based on the analysis above and in Appendix G of this Draft EIR, the Project would generally not conflict with any land use plan, policy, or regulation adopted for

the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with land use plans would be less than significant.

(2) Mitigation Measures

The Project's impact related to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 21 related projects in the vicinity of the Project Site. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office space, and retail uses, as well as mixed-use developments incorporating some or all of these elements. The related projects generally consist of infill development and redevelopment of existing uses, which are encouraged by the land use policies for the Project vicinity. Furthermore, the related projects and the Project would increase employment opportunities in the Project vicinity, concentrate development near public transit, provide needed housing and amenities, and activate the surrounding area, consistent with local and regional goals and objectives. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Since the Project would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, the Project and related projects would not result in significant cumulative impacts related to land use consistency. As such, cumulative impacts related to land use consistency would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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