

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, policies, and regulations that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including: Section IV.A, Aesthetics, which evaluates Project consistency with the Urban Design Chapter of the General Plan Framework Element; Section IV.B, Air Quality, which evaluates the Project's consistency with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) and the City of Los Angeles (City) General Plan (General Plan) Air Quality Element; Section IV.E, Greenhouse Gas Emissions, which evaluates the Project's consistency with the California Air Resource Board (CARB) 2022 Scoping Plan, the Los Angeles Green Building Code, and the City's Green New Deal; and Section IV.I, Transportation (and the Transportation Assessment included as Appendix I.1 of this Draft EIR), which evaluates the Project's consistency with Mobility Plan 2035 (Mobility Plan) and Vision Zero Action Plan.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65300 *et seq.*
- Senate Bill 375
- Senate Bill 743
- PRC 21064.3 Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy
- Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan

- City of Los Angeles General Plan
- Westchester–Playa del Rey Community Plan
- Los Angeles Municipal Code
- Los Angeles Coastal Transportation Corridor Specific Plan
- 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 for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(a) 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 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.

(b) Senate Bill 743

In September 2013, Governor Edmund G. “Jerry” Brown signed SB 743, which made several changes to CEQA for projects located in areas served by transit. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that “aesthetic

and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines the following:

- “Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.
- “Transit priority area” means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.
- “Employment Center Project” means a project located on property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75, located within a transit priority area.

PRC Section 21064.3 defines “major transit stop” as a site containing 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.

(c) PRC 21064.3

On September 19, 2024, Governor Gavin Newsom signed AB 2553, which expands the scope of transit-oriented developments that are eligible for incentives, including density bonus, CEQA exemptions, reduced traffic impact fees, and elimination of parking requirements. Under AB 2553, which is now PRC Section 21064.3, the definition of “major transit stop” is revised to increase the frequency of service intervals from 15 minutes to 20 minutes.

(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 and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and

Ventura) and 191 cities in an area covering more than 38,000 square miles. The agency develops long-range regional transportation plans including sustainable communities strategy (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).¹

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.
- **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). However, projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. These projections are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG's core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband and mobility hubs. The 2024–2050 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.²

¹ SCAG, *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, adopted March 8, 2025.

² SCAG, *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, adopted March 25, 2025.

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 Project’s potential to conflict with the relevant policies of the 2024–2050 RTP/SCS is provided further below.

The 2024–2050 RTP/SCS defines PDAs as areas within the SCAG region where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis, and are used for different purposes, such as growth visioning, performance measurement or grant applications. As a general principle, development in PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs), Livable Corridors,³ TPAs,⁴ and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also High Quality Transportation Corridors (HQTCs).⁵

(b) Los Angeles County Airport Land Use Commission Airport Land Use Plan

The Los Angeles County Airport Land Use Commissions (ALUC) implements state law regarding airports and surrounding land use compatibility for the County. In Los Angeles County, the Regional Planning Commission acts as the ALUC. The Los Angeles County

³ 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 along a High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT), other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.”

⁴ In accordance with CEQA Guidelines Section 21099(a)(7), a transit priority area is “an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.”

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.

Airport Land Use Plan (Airport Land Use Plan) provides for the orderly expansion of the County's public use airports and the area surrounding them. It is intended to provide for the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards. In formulating this plan, the Los Angeles County ALUC has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.⁶

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),⁷ 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,⁸ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans. No housing exists on the Project Site and the Project does not propose housing. As such, no discussion of the housing chapter is provided below.

⁶ *County of Los Angeles Department of Regional Planning, Los Angeles County Airport Land Use commission, Los Angeles County Airport Land Use Plan, adopted December 19, 1991, revised December 1, 2004,*

⁷ *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed September 23, 2025.*

⁸ *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).*

(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) 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.⁹ 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

⁹ *City of Los Angeles General Plan Framework*, p. 5-1, et. seq.

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 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.

(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, 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.¹⁰ 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.
- 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.

¹⁰ *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, 2015.*

(v) *Westchester–Playa del Rey Community Plan*

The Westchester–Playa del Rey Community Plan (Community Plan), which was adopted in April 13, 2004, is the land use element of the General Plan applicable to the Community Plan Area and covers the area generally bounded by Centinela Avenue, La Brea Avenue, the City of Los Angeles boundaries with unincorporated County of Los Angeles, the City of Inglewood, the City of El Segundo, Dockweiler State Beach, Ballona Creek, Bay Street and Jefferson Boulevard. 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.¹¹

The Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:

- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

The City is currently updating the Community Plan. A draft of the proposed Community Plan update was published on the Department's website in Spring 2024. As shown on the Draft General Plan Land Use Designation Map for the draft Community Plan, the Project Site's land use would be Hybrid Industrial.

¹¹ *City of Los Angeles, Westchester–Playa del Rey Community Plan, April 13, 2004.*

The Project's consistency with the applicable goals, objectives, and policies in the Community Plan adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below.

(b) Los Angeles Municipal Code

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

(c) Los Angeles Coastal Transportation Corridor Specific Plan

The City adopted the Coastal Transportation Corridor Specific Plan (CTCSP) to establish a transportation mitigation program for all lots located in whole or in part within the CTCSP Area. The regulations of the CTCSP are in addition to those set forth in the planning and zoning provisions of Chapter 1 of the LAMC, as amended, and any other relevant ordinances, and do not convey any rights not otherwise granted under the provisions and procedures contained in the LAMC and other relevant ordinances. Provisions within the CTCSP supersede the applicable regulations of the LAMC unless overridden by the LAMC or another adopted ordinance. The CTCSP is intended to adopt a transportation impact mitigation program in the plan area that achieves the following purposes¹²:

- Implement City and state policies concerning transportation, including the City of Los Angeles' General Plan Framework Element and Mobility Plan 2035, and state legislation (including SB 375, SB 743, and AB 1358) that reprioritize transportation improvements to focus on access to transit and active transportation as strategies to reduce dependence on vehicular travel, and reduce vehicle miles traveled (VMT) and associated greenhouse gas emissions;
- Improve mobility options within the plan area by providing transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, vehicle), primarily within existing available right-of-way, as part of a transportation system that is consistent with the City's General Plan Elements (Community Plans and Mobility Plan 2035);
- Produce fewer auto trips per capita and decrease VMT per capita by increasing multimodal transportation options and promoting best practices in Transportation Demand Management (TDM);

¹² *City of Los Angeles, Los Angeles Coastal Transportation Corridor Specific Plan (Ord. No. 168,999), September 22, 1993, amended June 28, 2019.*

- Enhance mobility and connectivity along key transportation corridors, particularly by planning for dedicated transit lines that serve north-south corridors, including Lincoln and Sepulveda Boulevards, and provide connections to planned east-west transit lines;
- Enhance the transportation system by planning for better regional transit connectivity and “first mile–last mile” solutions such as better pedestrian conditions, bike share, improved bicycle facilities, and circulator bus service;
- Encourage walking and bicycling as a means to safely and conveniently access transit and circulate within and between neighborhoods;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Mitigate the transportation impacts resulting from new development within the plan area by providing a mechanism to fund and implement specific transportation improvements;
- Establish the Transportation Impact Assessment Fee in compliance with the Mitigation Fee Act for new development within the plan area;
- Ensure that costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts;
- Ensure that contributors to this CTCSP’s fund benefit from the public transportation, bicycle, and pedestrian improvements constructed using Transportation Impact Assessment Fee funds;
- Enhance the streetscape environment and reinforce the neighborhood identity on portions of major arterials by using a consistent palette of amenities to improve streetscape aesthetics, promoting sustainable landscaping practices, creating a more inviting pedestrian environment that supports local commerce, and providing a pleasant and safe active transportation experience.
- Encourage parking strategies, such as demand-based pricing schemes, capacity management, travel demand management programs, and shared parking to manage parking supply.
- Promote neighborhood protection programs, where feasible, when implementing multimodal improvements, in order to minimize intrusion of commuter traffic through residential neighborhoods by the implementation of non-restrictive traffic calming measures;
- Reduce Trips by supporting the development of affordable housing at or near job sites and near transit, consistent with City policies;

- Establish Transportation Impact Assessment Fees that do not hinder the development of housing for diverse income levels in the Westside, including affordable housing for moderate, low, and very low income levels; and
- Ensure that development projects that are implemented in a phased manner include appropriate mitigations for each individual development phase.

(d) Citywide Design Guidelines

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

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with an approximately 37,860-square-foot rental car facility. The Project Site currently has two single-story buildings with maintenance facilities and office uses, as well as surface parking. Additionally, the Project Site contains accessory structures, including a carwash, solar panel canopies, and fueling station canopies. Access to the Project Site is provided via vehicle ingress/egress along Interceptor Street and egress onto West Arbor Vitae Street, as well as bus ingress along South Airport Boulevard and egress along West Arbor Vitae Street. The perimeter of the Project Site is secured with chain link fencing and concrete block walls. Further, two, double-sided advertising billboards are located within the Project Site boundaries along South Airport Boulevard and would remain.

Existing landscaping within the Project Site includes 146 on-site non-protected trees and 14 street trees within the public right of way surrounding the Project Site. Existing on-site and street trees include species such as Shamel ash, queen palms, Canary Island pines,

weeping gigs, and jacarandas. Based on the Supplemental Tree Inventory Report included in Appendix B of this Draft EIR, none of the street trees are considered to be protected by the City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance No. 186,873).^{13,14}

As shown in Figure IV.G-1 on page IV.G-16, the Project Site is currently designated as Limited Manufacturing by the Community Plan. As shown in Figure IV.G-2 on page IV.G-17, the Project Site is zoned by the LAMC as [T][Q]M1-1 (Limited Industrial, Height District No. 1). The M1 Zone permits a wide array of land uses. Specifically, the M1 Zone permits any land use permitted in the MR1 (Restricted Industrial)¹⁵ and specific commercial uses in the C2 (Commercial) zones, in addition to other specified uses including, but not limited to, foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. According to LAMC Section 12.17.6 A.2, any commercial use permitted in the C2 Zone is allowed except sanitariums and hospitals, provided that these uses are conducted in accordance with all building enclosure and fence enclosure limitations of the C2 Zone. The “1” in the Project Site’s zoning designation refers to the Project Site’s location in Height District No. 1. All uses located in the M1 Zone and within Height District No. 1 are restricted to a maximum FAR of 1.5:1.¹⁶ In the M1 Zone, buildable area for FAR purposes is the same as lot area. With a maximum FAR of 1.5:1, the Project Site’s 789,989 square feet of lot area/buildable area would permit up to 1,184,984 square feet of floor area. Height District No. 1 within the M1 Zone normally imposes no height limitation; however, the Project Site is subject to the Commercial Corner Development height limit of 45 feet as established by the LAMC Section 12.22 A.23.

The M1 zone does not impose any setback requirements for commercial or industrial uses. However, the Project Site is subject to “Q” Conditions established by Ordinance No. 167,642, adopted in 1992, which changed the zone to [T][Q] M1-1 and incorporated “Q”

¹³ *Arborist Tree Survey and Report for Rexford LAX Industrial Project 9000 Airport Boulevard Los Angeles, California, Steve F. Anderson / Arborist Services, February 2024. See Appendix IS-1 of the Initial Study, included as Appendix A of this Draft EIR. A Supplemental Report (Supplemental Tree Survey and Arborist Report, 9000 Airport Boulevard, Los Angeles, Steve F. Anderson / Arborist Services, September 2025) is included as Appendix B of this Draft EIR.*

¹⁴ *Pursuant to 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, 4.5 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, 4.5 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. This definition does not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.*

¹⁵ *Provided that all regulations of the zone are complied with, except that front yard setbacks are not required. See LAMC Section 12.17.6.A.1.*

¹⁶ *FAR and height restrictions can be found at LAMC Section 12.21.1 A.1.*



LEGEND

GENERALIZED PLAN LAND USE

RESIDENTIAL

- Low / Low I Residential
- Medium I Residential

INDUSTRIAL

- Limited Manufacturing
- Light Manufacturing

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support

INDUSTRIAL

- Limited Industrial

Figure IV.G-1

Land Use Designations on the Project Site

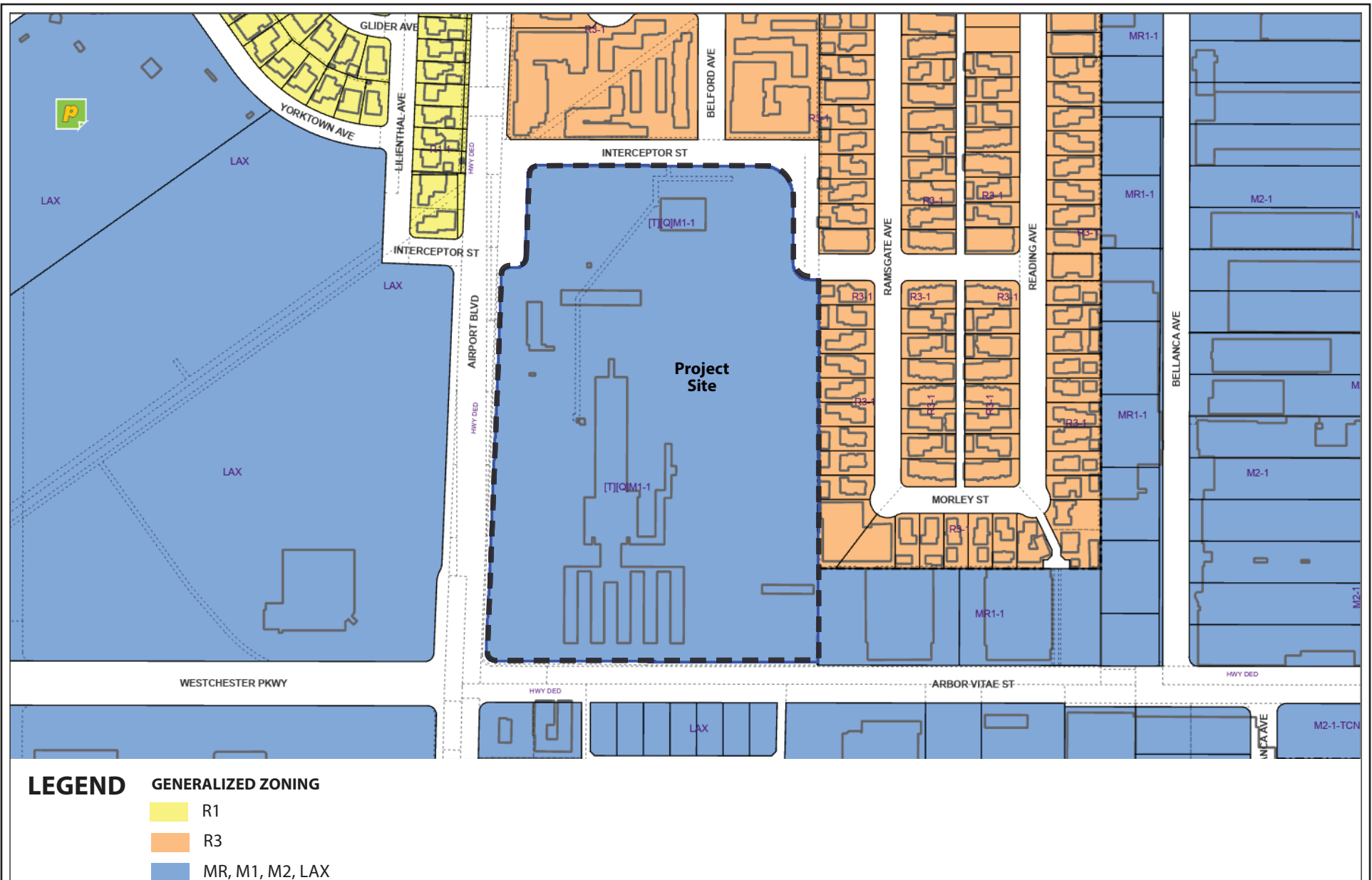


Figure IV.G-2
Zoning Designations on the Project Site

Conditions in Section 2 of Ordinance No. 151,439.^{17,18,19} The Project Site's "Q" Conditions include development regulations in exceedance of standard LAMC requirements for commercial/warehouse development (such as 50-foot building setbacks vs. 0 feet under standard LAMC requirements). Specifically, the applicable "Q" Conditions include the following:

1. That no portion of the property shall be developed or used for a commercial-retail use except for that portion presently classified in the C2-1 Zone at the corner of South Airport Boulevard and West Arbor Vitae Street having frontages of approximately 150 feet and approximately 250 feet, respectively.
2. That all open areas not used for buildings driveways, parking areas, recreation facilities, or walks shall be attractively landscaped in accordance with a landscape plan prepared by a licensed architect or landscape architect. The plan shall provide for the protection and preservation of as many of the existing large, mature trees on the subject property as possible. Also, that all existing trees by size and type shall be shown on a landscape plan including those to be removed. All landscaped areas shall be equipped with automatic sprinklers and shall be maintained in a first-class condition at all times.
3. That a 15-foot landscaped setback shall be provided along Interceptor Street on the north and west boundaries, and the existing seven-foot landscaped setback along Interceptor Street on the east boundary shall be preserved and maintained in a first-class condition.
4. That a landscaped setback shall be provided along South Airport Boulevard and West Arbor Vitae Street to a minimum depth of ten feet and along the east property line contiguous to the R3-1 Zone to a minimum depth of five feet to include trees planted, 15 gallon and 10 feet tall at the time of planting of a type similar to those contained in Section VII of the Planning Department's Technical Report on Shrubs and Trees for Landscaping and Screening. Such trees shall be planted at a minimum distance of 30 feet apart and at a maximum distance of 40 feet apart.
5. That all vehicular ingress and egress from the subject property shall be restricted from Interceptor Street adjacent to the R3 zoned residential area, except for that portion of Interceptor Street both parallel to and adjacent to South Airport

¹⁷ Ordinance No. 167,642, adopted by the City Council on February 21, 1992.

¹⁸ Ordinance No. 151,439, approved by the City Council on September 19, 1978.

¹⁹ Based on email correspondence with the Department of City Planning on November 17, 2023, although the [T] symbol is present in the zoning, there are no [T] conditions associated with the Project Site.

Boulevard and except for one driveway at the most westerly portion of Interceptor Street across from the R3-1 Zone north of the subject property that is near South Airport Boulevard, at a location acceptable to the Department of Traffic. This is not to exclude any emergency access necessary for fire protection purposes only. The driveway onto Interceptor Street shall have a clearly visible sign posted on the property prohibiting right turns out of the driveway.

6. That reasonable efforts be made to relocate for replanting any trees which are removed from the subject property.
7. That any use built near (within 50 feet) the northern and/or eastern boundary lines shall have walls built to a thickness of 12 inches to lower the internal noise level to an acceptable level; or, that evidence shall be submitted with the application for a building permit, by a person experienced in acoustical engineering, specifying the CNEL contour within which the building will be located, and based on such CNEL contour, the construction necessary to achieve a noise level to comply with the City's Noise Ordinance.
8. That any building to be built on the subject property shall exclude windows and openings on buildings facing residences, or use double-insulated glass on such windows that face residences to the north and east. Further, that sound-absorbing materials shall be used between walls to minimize the reflections of noise.
9. That all loading areas on the north or east side of buildings shall be so designed and screened in order that sound emanating therefrom will comply with the City's Noise Ordinance.
10. That the applicant shall provide storm drains to the satisfaction of the City Engineer, or such improvements shall be suitably guaranteed without expense to the City of Los Angeles.
11. That prior to any excavation onsite, written notice shall be given to the Los Angeles County Museum within 30 days prior to grading; a copy of such written notice shall be submitted to the file prior to the granting of any grading permits by the Department of Building and Safety. Further, that the applicant shall make satisfactory arrangements to allow access onto the site to any qualified professional archaeologist(s) who may be recognized as such by the Society for California Archaeology, to review and confirm the nature and extent of the archaeological resources onsite which may be uncovered in the excavation process.
12. That a burglar alarm system shall be provided to the satisfaction of the Police Department.

13. That all types of plants selected and required watering systems for such landscaping, to the extent possible, shall conserve water and shall be consistent with any wafering conservation ordinance enacted by the City.
14. That all lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas. This condition shall not preclude the installation of low-level security lighting.
15. That no building or structure to be built on the subject property shall be located within 50 feet of the northerly or easterly property line adjacent to or across the street from an R3-1 zoned lot.
16. That prior to the issuance of building permits, detailed development plans, including landscape plans, shall be submitted to the Department of City Planning for approval.

According to SCAG's 2024–2050 RTP/SCS, the Project Site is located within a SCAG-designated PDA (i.e., a NMA, Livable Corridor, and TPA). The Project Site is also located along an HQTC.²⁰

The Project Site is also located on an infill site, as defined in PRC 21099(a), because the Project Site consists of a lot located within an urban area that has been previously developed. The Project Site is also located within a TPA as defined in PRC Section 21099(a)(7), because it is located within 0.5 mile of an existing major transit stop (i.e., the intersection of South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, which currently provides bus stops with intersecting service headways of 20 minutes or less for LA Metro Local 117²¹, Santa Monica Big Blue Bus 3, and Culver City Bus 6).²² However, given that the FAR for Option 1 is 0.6:1 and the FAR for Option 2 is 0.5:1, the Project does not meet the definition of an employment center, which as discussed above, requires a FAR of 0.75:1.

The Project Site is identified as being located within the boundaries of the CTCSP established pursuant to Ordinance No. 168,999, effective on September 22, 1993, and

²⁰ SCAG, HQTC Interactive Map, <https://maps.scag.ca.gov/portal/apps/experiencebuilder/experience/?id=97f9699f14654b3b8895c74846541f75&page=home>, accessed September 23, 2025.

²¹ The LAX/Metro Transit Center opened June 6, 2025. The LAX/Metro Transit Center serves as the terminus for Metro Local 117, which travels along Sepulveda Boulevard. The LAX/Metro Transit Center also serves as a stop for the Metro C and K Lines and qualifies as a major transit stop. The Project Site is located within 0.50 miles of the LAX/Metro Center Station and, thus, is located within a Transit Priority Area.

²² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS) Parcel Profile Report for APN 4125010016, <http://zimas.lacity.org/>, accessed September 15, 2025.

amended pursuant to Ordinance Nos, 186,104 and 186,105 on June 28, 2019.²³ Additionally, the Project Site is located within the boundaries of the Los Angeles State Enterprise Zone. The Project Site is also located within two miles of the Los Angeles International Airport (LAX) and within the boundaries of the Airport Influence Area for LAX, as mapped in the Airport Land Use Plan. As such, development of the Project Site is subject to the safety policies included in the Airport Land Use Plan related to approach surfaces, building height restrictions, and acceptable uses.

(2) Surrounding Uses

The Project Site is located in an urbanized area that includes a mix of low-rise buildings containing industrial, residential, and commercial uses. The land use designations surrounding the Project Site include Airport Landside, Limited Industrial, Light Manufacturing, Limited Manufacturing, Medium Residential, and Low Residential and have varying zoning designations, including LAX, M1-1, M2-1, MR1-1, R3-1, and R1-1. Directly north of the Project Site, across Interceptor Street, are properties zoned R3-1 with single- and multi-family residential uses. To the east of the Project Site are properties zoned R3-1 and MR-1, which include single-and multi-family residential uses and a car rental facility. To the west of the Project Site, across South Airport Boulevard, are properties zoned R1-1 and LAX (as an indication of inclusion in the LAX Airport Specific Plan), which include airport-related surface parking and single-family residential to the northwest. To the south, across West Arbor Vitae Street, are properties zoned LAX and MR-1, which include a motel, a restaurant, and the LAX People Mover maintenance yard. The LAX People Mover is expected to have elevated tracks up to 50 feet in height running along 96th Street and will connect the Metro K Line to LAX. It is currently under construction and anticipated to be fully operational in 2026.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (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): 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.

²³ City of Los Angeles, Coastal Transportation Corridor Specific Plan, effective September 22, 1993, amended June 28, 2019.

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

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

b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents applicable to the Project Site 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 land use plans, including the 2024–2050 RTP/SCS, Airport Land Use Plan, General Plan (i.e., Framework Element, Mobility Plan, Conservation Element, Health and Wellness Element), Community Plan, LAMC (Zoning Code), CTCSP, and Citywide Design Guidelines, is included in this section of the Draft EIR (with Project consistency with several of these plans evaluated on a goal-by-goal, objective-by-objective, and policy-by-policy basis in Appendix G.1 of this Draft EIR). Under State Planning and Zoning law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of

competing interests, and agencies are given great deference to determine consistency with their own plans. As discussed in the Governor’s Office of Planning and Research State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, State law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.²⁴

c. Project Design Features

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

d. Analysis of Project Impacts

As discussed in Section II, Project Description, of this Draft EIR, the Project would be comprised of two development options—Option 1 and Option 2.

Under Option 1, the Project would be comprised of 355,390 square feet of warehouse floor area and 80,000 square feet of associated office floor area in a single industrial building with a total floor area of 435,390 square feet with an FAR of approximately 0.6:1. The industrial building under Option 1 would be 50 feet in height comprised of one level with a 40,000-square-foot office mezzanine level located above the ground level office use. Under Option 2, the Project would be comprised of three buildings totaling 320,056 square feet of warehouse floor area and 90,000 square feet of associated office floor area for a total floor area of 410,056 with an FAR of approximately 0.5:1. The industrial building on the northern portion of the Project Site (Building 1) would have a floor area of 117,930 square feet comprised of 87,930 square feet of warehouse floor area and 30,000 square feet of office floor area. The industrial building on the western portion of the Project Site (Building 2) would have a floor area of 154,083 square feet comprised of 124,083 square feet of warehouse floor area and 30,000 square feet of office floor area. The industrial building on the eastern portion of the Project Site (Building 3) would have a floor area of 138,043 square feet comprised of 108,043 square feet of warehouse floor area and 30,000 square feet of office floor area. All three industrial buildings under Option 2 would be 46 feet in height and each

²⁴ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

would be comprised of one level with a 15,000-square-foot office mezzanine level above the ground level office use. Under both Options, warehouse floor area may be used for either standard warehousing or last-mile delivery.

The Project would include surface parking with 274 vehicle parking spaces and 90 trailer parking spaces under Option 1, and 369 vehicle parking spaces under Option 2. In addition, 96 bicycle spaces would be provided under Option 1, and 91 bicycle parking spaces would be provided under Option 2. The Project (both Option 1 and Option 2) would be developed in conformance with all 16 of the applicable “Q” Conditions outlined previously.

To accommodate the Project, a total of 37,860 square feet of existing on-site rental car facilities floor area and the associated surface parking areas, accessory canopies and structures would be demolished.

As described above, the total floor area, building heights, massing, and footprint would differ between the two development options. Where these differences could alter potential land use and planning impacts, the options are considered separately. As such, the analysis provided below accounts for both development options and, generally, the term “Project” is used unless stated otherwise.

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 Project proposes the demolition of the existing rental car facility and construction of either one or three industrial buildings on an urban infill site surrounded by streets and urban development. The Project Site would maintain its established zoning designation of [T][Q]M1-1 and the proposed uses on the Project Site would be consistent with the mix and scale of the existing uses located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any existing adjacent public streets. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, impacts with respect to Threshold (a) would be less than significant, and 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

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

The Project's general consistency with the applicable policies set forth in the 2024–2050 RTP/SCS is discussed in Table 1 of Appendix G.1 of this Draft EIR. As detailed therein, the Project generally would not conflict with the applicable Regional Planning Policies set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the Project would support the Regional Planning Policies regarding Complete Streets (Regional Planning Policies 03, 04, 05, 07, and 09) as the Project would be implemented on an urban infill site within an existing urbanized area served by an established network of roads and freeways that provide local and regional access to the area, including the Project Site. The Project would also comply with all design element requirements which may affect public rights-of-way, including proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design that does not hinder sight distance, mobility, or accessibility. The Project's streetscape improvements would enhance the pedestrian experience with extensive landscaping and new trees along Project frontages. These perimeter area and Project Site improvements would also include lighting and wayfinding signage to enhance the experience and safety for all users. Furthermore, the Project Site is located within 0.5 miles of the intersection of South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, which is designated as a major transit stop pursuant to PRC Section 21064.3, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines, which would encourage transit use by Project employees and potentially reduce VMT. Thus, the Project would not conflict with the Regional Planning Policies related to Complete Streets.

The Project Site is located within a PDA (i.e., NMA, Livable Corridor, and TPA), which indicates alignment with the goals of the 2024–2050 RTP/SCS. The Project's TDM measures, as required by the existing TDM Ordinance (LAMC 12.26 G), would include bicycle parking in accordance with LAMC 12.21 A, displaying local transit information to promote and market alternative transportation modes and choices, designated carpool parking spaces as well as loading and unloading areas, and safe pedestrian and bicycle connections to off-site facilities, all of which would support the specific Regional Planning Policies related to PDAs, specifically those to reduce single-occupant vehicle (SOV) dependency and vehicle miles traveled (Regional Planning Policy 14, 15, 33, and 34). The industrial center would provide opportunities for industrial-related companies to be located in close proximity to LAX and major regional roadways and freeways, and would generate new economic and employment opportunities for the Westchester area, while being well-served by a variety of public transit options for employees. Thus, the Project would not conflict with the Regional Planning Policies related to TDM or PDAs.

Consistent with Regional Planning Policy 22 related to transportation safety, the Project would not preclude any future Vision Zero safety improvements by the City. Vision Zero has identified the High Injury Network (HIN), a network of streets included based on collision data from the last five years, where strategic investments by LADOT will have the biggest impact in reducing death and severe injury. None of the streets adjacent to the Project Site have been identified as part of the HIN.²⁵ Further, the Project would conform to all design element requirements, which may affect public rights-of-way (ROWS), including proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility. Thus, the Project would not conflict with the Regional Planning Policies related to transportation safety.

In support of the Regional Planning Policies related to sustainable development (Regional Planning Policies 48 and 49), the Project would incorporate environmentally sustainable building features equivalent to Gold certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. In addition, both in compliance with and, in some cases, in exceedance of code requirements, a number of specific sustainable design components would be incorporated into the Project, including but not limited to, Energy Star appliances; solar panels; continuous insulation and high-performance glazing to minimize heating and cooling loads; ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles, and 30 percent of the Project's automobile parking spaces would be designated as electric vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE), with 20 percent of the spaces equipped with EV charging stations. Additionally, the Project would include implementation of Project Design Feature AIR-PDF-1, which would require the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards; Project Design Feature AIR-PDF-2, which would require infrastructure capable of supporting future EVSE for tractor trailers; Project Design Feature AIR-PDF-3, which would require electrical hookups for charging forklifts; and Project Design Feature AIR-PDF-4, which would require electrical hookups for all loading bays. Furthermore, the Project would be subject to all applicable 2022 Title 24 Standards, and the Project would implement Project Design Feature GHG-PDF-1, which would prohibit use of natural gas during Project operations in

²⁵ Gibson Transportation Consulting, Inc., *Transportation Assessment for 9000 Airport Boulevard, Los Angeles, California, October, 2025*. See Appendix I.1 of this Draft EIR.

new buildings.²⁶ Further, Project Design Feature GHG-PDF-2, would require the installation of a solar array.

Based on the above and as presented in Table 1 in Appendix G.1 of this Draft EIR, overall, the Project would generally not conflict with the applicable goals and policies of the 2024–2050 RTP/SCS.

(ii) Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan

As noted above, the Project Site is located within two miles of LAX and within the boundaries of the Airport Influence Area for LAX, as mapped in the Airport Land Use Plan. As such, the Project would be subject to the safety policies included in the Airport Land Use Plan related to approach surfaces, building height restrictions, and acceptable uses. In addition, in its September 19, 2024, comment letter on the Project's Notice of Preparation (refer to Appendix A.3 of this Draft EIR), the ALUC stated that the Project does not include any significant issues with Airport Land Use Plan compatibility and further ALUC review for compliance is not required. With respect to airport noise, as discussed in Section IV.H, Noise, of this Draft EIR, the Project Site is located within the 70 – 75 CNEL noise contours, which is considered normally/conditionally acceptable for industrial use.²⁷ In addition, the Project would comply with CALGreen sound insulation requirements for buildings exposed to noise levels exceeding 65 dBA (L_{eq}). Hence, the Project would not conflict with the Airport Land Use Plan.

(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, Mobility Plan, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), Community Plan, LAMC (Zoning Code), CTCSP, and Citywide Design Guidelines, that were specifically adopted for the purpose of avoiding or mitigating land use-related environmental effects.

²⁶ While on May 14, 2025, the Los Angeles City Council instructed LADBS to immediately stay enforcement of Ordinance No. 187,714 and requested the City Attorney to transmit an ordinance reviewed as to form and legality that would repeal Ordinance No. 187,714 in light of the 9th Circuit's decision, the Project Applicant is providing Project Design Feature GHG-PDF-1, which would prohibit use of natural gas during Project operations and is consistent with the requirements that were included in Ordinance No. 187,714.

²⁷ Los Angeles World Airports (LAWA), Los Angeles International Airport 3Q24 Noise Contours.

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

The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix G.1 of this Draft EIR. While the Project would require several land use entitlements, it would nevertheless be consistent with the General Plan land use designation and zoning of the Project Site. 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 Land Use Chapter establishes districts, centers and mixed-use boulevards which are described by ranges of intensity/density, heights, and lists of typical use. The Project Site is not categorized as a Neighborhood District, Community Center, Regional Center, Downtown Center, or Mixed Use Boulevard. As discussed in Section II, Project Description, of this Draft EIR, the Project would be comprised of two options that would each construct new industrial (i.e., warehouse) uses. Specifically, Option 1 would develop one industrial building comprised of up to 435,390 square feet of floor area with a FAR of approximately 0.6:1 and a maximum building height of 50 feet. Option 2 would develop three industrial buildings comprised of up to 410,056 square feet of floor area with a FAR of approximately 0.5:1 and a maximum building height of 46 feet. The area surrounding the Project Site is highly urbanized and includes a mix of low-rise (up to four-story) buildings containing industrial, residential, and commercial uses. While Framework Element does not designate the Project Site as a district, center, or mixed-use boulevard, the Project would generally be consistent with the type, density and height of land uses in the Project vicinity, including the shipping and warehouse facilities associated with LAX.

The Project would support Goal 3A in the Land Use Chapter by creating a physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a car rental facility as well as associated surface parking. As such, the Project would not displace existing housing, develop an undeveloped site that is surrounded by existing housing, or otherwise conflict with existing residential uses or encroach into natural open space or natural

resources (i.e., natural habitat, water bodies, streams, wetlands, forest area, etc.). The Project would promote a more balanced distribution of land uses that would contribute towards and facilitate the City's long-term fiscal and economic viability by transforming the Project Site from a car rental facility and associated paved surface parking areas into a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and operational logistics strategically located near LAX and major regional roadways and freeways. The Project's proximity to both a job center and housing would promote a healthful living environment. Additionally, the Project would support the vision for a more livable city by being located within a SCAG-designated PDA and HQTC well-served by public transit, and implementing TDM measures as required by the City's TDM Ordinance. As such, the Project would reduce VMT and their related vehicular air emissions. As discussed in Subsection XV, Public Services, and XIX, Utilities and Service Systems, of the Initial Study included in Appendix A of this Draft EIR: (1) agencies providing public services and utilities to the Project Site, as well as landfills serving the Project Site, would have the capacity to serve the Project; and (2) the Project would not require the construction of new or expanded public services facilities, public roads, or landfills, the construction of which would cause significant environmental impacts. In addition, as discussed in Subsection XIX. Utilities and Service Systems, major utility system upgrades would not be required. Pursuant to Project Design Feature WAT-PDF-1, the Project would install one new fire hydrant that would connect to the existing water mains located along South Airport Boulevard. With the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated fire flow demand. Furthermore, while the Project would not be required to provide open space in accordance with the LAMC Section 12.21 G, both Project options would provide extensive landscaping along the street frontages which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street.

The Project would support 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. Specifically, while the Project buildings would be a maximum of 50 feet in height, this height would not be out of character with some of the existing adjacent development such as the two existing four-story apartment buildings north of the Project Site across Interceptor Street, as well as airport-related industrial uses in the surrounding area. The Project would also enhance the landscaped setbacks along the Project Site's boundaries, across from the residential uses, and would control lighting from the proposed buildings(s), as required by the "Q" Conditions, would replace any street trees to be removed on a 2:1 basis, would result in a net increase in on-site trees, and would locate the proposed loading docks interior to the Project Site such that they would be largely blocked from view from the existing residential uses to the north and east (see the conceptual site plans in Section II, Project Description, of this Draft EIR). Additionally, the proposed development would be designed in an architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. Specifically, the Project would feature design elements such as

varied roof lines, extensive landscaping, and neutral colors, tinted glazing, and accent materials. The use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually.

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

(b) Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter is built around two concepts: “urban form” and “neighborhood design.” The Framework Element defines “urban form” as (a) the “general pattern of building height and development intensity” and (b) the “structural elements” that define the City physically, such as natural features, transportation corridors (including the planned fixed rail transit system), open space, public facilities, as well as activity centers and focal elements. “Neighborhood design” is defined as the physical character of neighborhoods and communities within the City. The Project would support Objective 5.5 of the Urban Form and Neighborhood Design Chapter to enhance the livability of all neighborhoods by replacing a 37,860-square-foot rental car facility on an underutilized lot with a new, modern industrial center built in conformance with the latest Building Code, architectural, and urban design requirements (including with the “Q” Conditions applicable to the Project Site which would exceed standard LAMC setback, tree replacement, landscaping, lighting, etc. requirements for commercial/industrial development). In addition, the Project would support environmental sustainability by incorporating sustainable building features equivalent to Gold certification under the U.S. Green Building Council’s LEED® Rating System for new construction and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. The Project’s sustainability features would improve the quality of the public realm by promoting healthy living and encouraging the continued use of environmentally friendly building features. Furthermore, the Project would include extensive landscaping and new trees along all Project frontages. Moreover, as discussed above, the Project would also include improved lighting, wayfinding signage, and bicycle parking to enhance the experience and safety for all users. Overall, the uses and improvements proposed by the Project would enhance the quality of the Project Site and the area in the vicinity of the Project Site and the public realm. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Open Space and Conservation Chapter

As discussed in Table 2 of Appendix G.1 of this Draft EIR, the Project would support Open Space and Conservation Chapter Policy 6.4.8 to seek new opportunities for private

development to enhance the open space resources of the neighborhoods. The Project Site is currently fully developed with urban uses, and is surrounded by urban development, such that the Project would not convert open space areas or associated resources (such as forest resources, wetlands, etc.) to urban use. In addition, as an industrial development, the Project would not be required to provide open space in accordance with the LAMC Section 12.21 G. Notwithstanding, the Project's landscaping plans have been designed to enhance the public realm and create more effective transitions between off-site and on-site uses. Landscaping elements would be used to unify the various buildings on the Project Site through a diverse plant palette to be used along the street frontages and throughout the Project Site. Plantings would include resilient, drought-tolerant, California native, and adaptive tree, shrub, and groundcover species, including shade trees. For Option 1, a total of 93,100 square feet of landscaped areas are proposed. For Option 2, a total of 120,400 square feet of landscaped areas are proposed. Under both options, the Project would also enhance the public right-of-way through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse buildings including integration of fencing with planting along the perimeter of the site. The Project would include new landscaping and maintenance of existing landscaping along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard as well as in the interior of the Project Site in exceedance of standard LAMC requirements for commercial/industrial development (i.e., in accordance with the "Q" Conditions). The Project would also result in a net increase in on-site trees and would replace any street trees to be removed on a 2:1 ratio in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153,500. Therefore, the Project would not conflict with the applicable goals and policies set forth in the Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Economic Development Chapter

The Economic Development Chapter contains goals, objectives, and policies that are designed to facilitate business retention and job growth in a variety of ways, including but not limited to, providing appropriate sites and infrastructure to accommodate future commercial and industrial growth, and focusing the City's economic development efforts to more effectively utilize available resources. Within the Economic Development Chapter, the Project would support Objective 7.2 to establish a balance of land uses, by locating an industrial center near LAX's cargo service providers and major freeways. Additionally, the Project would transform the Project Site from an existing car rental facility and surface parking areas into a state-of-the-art industrial center that would provide opportunities for industrial-related companies and generate new economic and employment opportunities for the Westchester area. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Economic Development Chapter.

(e) Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter contains goals, objectives, and policies that are designed to seek solutions to public infrastructure and services. Within the Infrastructure and Public Services Chapter, the Project would support Policy 9.3.1 to reduce the amount of hazardous substances and the total amount of flow entering the wastewater system by developing uses that do not include the handling or generation of hazardous substances (see Section IV.F, Hazards and Hazardous Materials, of this Draft EIR). Furthermore, incorporation of water conservation features, such as ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; and water-efficient plantings with drought-tolerant species, discussed in Section II, Project Description, of this Draft EIR, would minimize water use and the corresponding wastewater generation that would enter the wastewater system such that the Project would not exceed the capacity of the local sewer lines serving the Project Site (see the wastewater infrastructure analysis in Appendix A, Initial Study, of this Draft EIR). In addition, as discussed in the Project's Initial Study, Project construction activities would occur in accordance with City grading permit regulations. The Project would implement a Storm Water Pollution Prevention Plan (SWPPP) to minimize the discharge of pollutants in stormwater runoff during construction and would incorporate appropriate best management practices (BMPs) during operation in compliance with the City's Low Impact Development (LID) Ordinance to reduce the quantity and improve the quality of runoff that leaves the Project Site during operation.

The Project would support 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. As discussed in the Initial Study, included as Appendix A, of this Draft EIR, based on the Project's anticipated water demand and Los Angeles Department of Water and Power's (LADWP's) demand projections provided in its 2020 Urban Water Management Plan, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Moreover, as indicated therein, the Project would not exceed the available capacity of the water distribution infrastructure that would serve the Project Site. Furthermore, the Project would support Goal 9A to provide adequate wastewater collection and treatment capacity. Specifically, the Project's increase in the average daily wastewater flow would represent a nominal percentage of the remaining available capacity at the Hyperion Water Reclamation Plant, and there is adequate treatment capacity to serve the Project Site together with projected future demand and existing commitments. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the 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 Mobility Plan is discussed in Table IV.I-2 in Section IV.I, Transportation, of this Draft EIR. Specifically,

the Project would support Policy 1.6 to provide for the safe passage of all modes of travel during construction by preparing a Construction Traffic Management Plan (CTMP) pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR that would include safe detour routes for all applicable travel modes, including pedestrian and transit users, and any potential impediments to the public ROW. The Project would also support Policy 2.3 to ensure high quality pedestrian access in all site planning and public ROW modifications to provide a safe and comfortable walking environment.

The Project would also support Policy 3.1 to recognize all modes of travel by implementing the Project's TDM measures, as required by the existing TDM Ordinance (LAMC 12.26 G), which would include bicycle parking in accordance with LAMC 12.21 A, displaying local transit information to promote and market alternative transportation modes and choices, designated carpool parking spaces as well as loading and unloading areas, and safe pedestrian and bicycle connections to off-site facilities. Specifically, the Project would provide 96 bicycle parking spaces (44 short-term and 52 long-term) under Option 1 and 91 bicycle parking spaces (41 short-term and 50 long-term) under Option 2. Primary pedestrian access to the Project would be provided via several access points along Interceptor Street, South Airport Boulevard, and West Arbor Vitae Street. Bicycle access would be provided along South Airport Boulevard. All vehicular access to the Project Site would be separate from the pedestrian and bicycle access points thereby improving bicycle and pedestrian safety. Furthermore, the Project Site's location within an area that is well-served by public transit would further promote walking as a component of trips. Therefore, as set forth in Section IV.I, Transportation, of this Draft EIR, the Project would not conflict with the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(3) Conservation Element

The Project would not conflict with the City's goal to preserve, protect, and enhance its existing natural resources or its objective to preserve, protect, restore, and enhance natural plant and wildlife diversity, habitats, corridors, and linkages.

As discussed in the Initial Study, included as Appendix A, of this Draft EIR, the Project Site is located in an urbanized area that is surrounded by urban development and is currently developed with commercial uses as well as associated surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site does not include any forest land or timberland and is not zoned as forest land or timberland. The Project Site does not contain large expanses of open areas or natural resources, watercourses, wetlands, or natural habitat or provide linkages to natural open spaces areas. There are 146 non-protected trees on the Project Site and 14 non-protected street trees adjacent to the Project Site. None of the on-site trees or street trees are considered protected

by the City of Los Angeles Protected Tree and Shrub Regulation (Ordinance No. 186,873).²⁸ As indicated in the Supplemental Tree Inventory Report, included in Appendix B of this Draft EIR, a total of two existing street trees would be removed under Option 1 and five existing street trees would be removed under Option 2. However, in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153,500, the Project would replace the removed street trees at a 2:1 ratio. For on-site trees, per "Q" Condition No. 6, reasonable efforts must be made to relocate for replanting any trees which are removed from the Project Site. In addition, any trees removed from the Project Site would be replaced on-site at a 1:1 ratio. Additionally, no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or state- or federally-protected wetlands exist on the Project Site. Furthermore, no mineral extraction operations currently occur on the Project Site, and none are proposed by the Project.

As discussed in Subsection V, Cultural Resources, of the Initial Study, included as Appendix A of this Draft EIR, there are no historical buildings in or adjacent to the Project Site. The Project Site is not identified as individually listed in or formally determined to be eligible for listing in the National Register, the California Register, or identified in SurveyLA. Further, the Project Site does not contain any extant buildings, structures, objects, sites, or districts with any historical associations or significance necessary for California Register eligibility. Therefore, the Project would not conflict with the Conservation Element's objective to protect important cultural and historical sites and resources.

With respect to archaeological resources, as discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would also adhere to the City's standard condition of approval to address any inadvertent discovery of archaeological resources. With adherence to the City's standard condition of approval, the Project would not cause a substantial adverse change in the significance of an archaeological resource, and impacts to archaeological resources would be less than significant. With respect to paleontological resources, as discussed in Section IV.D, Geology and Soils, of this Draft EIR, with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-2, impacts to paleontological resources would be less than significant. Therefore, with implementation of the City's established conditions of approval for archaeological resources and Mitigation Measures GEO-MM-1 through GEO-MM-2 for paleontological

²⁸ Pursuant to 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, 4.5 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, 4.5 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. This definition does not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.

resources, the Project would support the Conservation Element's objective to protect the City's archaeological and paleontological resources.

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

The Health and Wellness Element includes a policy to promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials, and universal accessibility using existing tools, practices, and programs (Policy 2.2). The Project would support this policy as it would incorporate sustainable building features equivalent to Gold certification under the U.S. Green Building Council's LEED® Rating System for new construction and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. In addition, both in compliance with and, in some cases, in exceedance of Code requirements, a number of specific sustainable design components would be incorporated into the Project, including but not limited to, Energy Star appliances; solar panels; continuous insulation and high-performance glazing to minimize heating and cooling loads; ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles, and EV parking spaces in accordance with the LAMC and CALGreen Code. The Project would also include implementation of Project Design Feature AIR-PDF-1, which would require the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards; Project Design Feature AIR-PDF-2, which would require infrastructure capable of supporting future EVSE for tractor trailers; Project Design Feature AIR-PDF-3, which would require electrical hookups for charging forklifts; and Project Design Feature AIR-PDF-4, which would require electrical hookups for all loading bays. Furthermore, the Project would be subject to all applicable 2022 Title 24 Standards, would implement Project Design Feature GHG-PDF-1, which would prohibit use of natural gas during Project operations in new buildings, and Project Design Feature GHG-PDF-2, which would require the installation of a solar array. To further support a healthy built environment, the Project would promote a pedestrian-oriented design and mobility through extensive landscaping and new trees along Project frontages. These perimeter area and Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage to enhance the experience and safety for all users.

Overall, the Project would support a healthy built environment through sustainable building practices, a pedestrian-oriented design, and environmentally friendly building features, all of which contribute to healthy working conditions.

The Project would feature new landscaping along the adjacent streetscape, resulting in a net increase in trees both on the Project Site and within the public right-of-way. Additionally, the outdoor areas of the Project Site would create seamless transitions and visually unify the various buildings and daily operations across the site. In compliance with the “Q” Conditions for the Project Site, the Project would provide a minimum 50-foot building setback along the northern and eastern portions of the Project Site and retain and enhance the landscaped setbacks along those boundaries, serving as a buffer from adjacent residential uses. The Project would also control lighting and construct the proposed buildings(s) with noise attenuation along the northern and eastern frontages, as required by the applicable “Q” Conditions. Furthermore, as required by “Q” Condition 13, the Project would incorporate water-efficient plantings with drought-tolerant species and water systems (e.g., weather-based irrigation systems) that, to the extent possible, would conserve water and further contribute to a healthy environment.

The Health and Wellness Element also includes a policy to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health (Policy 5.1). The Project Site would support this policy as it is an already developed urban infill site located within a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA), as well as a HQTC and is located within 0.5 miles of the intersection of South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, which is designated as a major transit stop pursuant to PRC Section 21064.3, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines. In addition, the Project would implement TDM measures as required by the City’s TDM Ordinance, which would reduce the number of single-occupancy vehicle trips to the Project Site and reduce VMT and their related vehicular air emissions, thereby contributing to improved local and regional air quality. 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) Westchester–Playa del Rey 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 3 of Appendix G.1 of this Draft EIR.

As discussed therein, the Project would be consistent with the relevant goals, objectives, and policies of the Community Plan. Specifically, the Project would support Objective 3-1 to provide locations for future industrial development and employment which are convenient to transportation facilities and compatible with surrounding land uses and

would also support Goal 15 to encourage the use of alternative modes of transportation to reduce traffic congestion, single-occupancy vehicle trips, VMT, and associated air emissions. The Project would transform the Project Site from an existing car rental facility and surface parking areas into a new, modern industrial center built to the latest Building Code, urban design, and architectural requirements. The proposed warehouse and last-mile facility²⁹ uses would provide opportunities for industrial-related companies and would generate new economic opportunities and a net increase in jobs for the Westchester area. The Project Site is also an urban infill site within a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA), as well as a HQTC that is well-served by a variety of public transit options provided by Metro, Santa Monica Big Blue Bus, Culver CityBus, and Beach Cities Transit. Furthermore, as discussed in Section IV.I, Transportation, of this Draft EIR, the Project design would include TDM measures as required by the City's TDM Ordinance that would encourage the use of transit and other alternative modes of transportation. These Project characteristics would serve to minimize Project-related traffic congestion, VMT, and associated air emissions.

With respect to Goal 8, Objective 8-1, as discussed in Subsection XV, Public Services, of the Initial Study, included as Appendix A of this Draft EIR, the Project would not result in the need for new or altered police protection facilities. Additionally, the Project would include numerous physical and operational strategies, including, but not limited to, 24-hour security personnel, employee and visitor badging, and visual surveillance, to enhance safety within and immediately surrounding the Project Site, thereby reducing the demand for police services.

With respect to Goal 9, Objective 9-1, and Policy 9-1.1, as discussed in Subsection XV, Public Services, of the Initial Study, included as Appendix A of this Draft EIR, the Los Angeles Fire Department (LAFD) was consulted during the preparation of the Initial Study. In addition, compliance with applicable Building and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. As concluded in the Initial Study, impacts fire protection service demand impacts would be less than significant.

The Project would support Goal 16 to encourage a system of safe, efficient and attractive bicycle and pedestrian facilities as well as Objective 16-2 to promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers by improving pedestrian accessibility within and around the Project Site by providing streetscape improvements and extensive landscaping. New trees would be installed and any street trees to be removed would be replaced on a 2:1 basis along all Project public street frontages. These perimeter area and

²⁹ A last-mile facility refers to a location, often a smaller warehouse or distribution center, that serves as the final stop before goods are delivered to the end customer.

Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage, and per the applicable “Q” Conditions preservation and enhancement of the existing landscaped buffers along the Project Site’s northern and eastern boundaries, all of which would enhance the experience and safety of bicyclists and pedestrians. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points which would further enhance bicyclist and pedestrian safety. Furthermore, driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would be designed to maximize sight distance and visibility to minimize potential vehicle-bicycle and vehicle-pedestrian conflicts. As previously discussed, the Project would also provide long-term and short-term bicycle parking spaces in accordance with LAMC requirements.

With respect to Goal 19 and Objective 19-1, as discussed in Subsection V, Cultural Resources, of the Initial Study, included as Appendix A of this Draft EIR, the Project would not directly or indirectly impact any historical or cultural resources as there are none in or adjacent to the Project Site.

Based on the above and as presented in Table 3 in Appendix G.1 of this Draft EIR, the Project would not conflict with the applicable goals, objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(ii) Los Angeles Municipal Code

As previously discussed, the Project Site is located within the Westchester–Playa del Rey Community Plan area. The Project Site is designated as Limited Manufacturing and is zoned as [T][Q]M1-1. Based on the Project Site’s land use designation and zone, the Project would be consistent with the existing General Plan land use designation and zoning of the Project Site, although a Vesting Class 3 Conditional Use Permit (CUP) is required as discussed further below.

As discussed in Section II, Project Description, of this Draft EIR, Option 1 would have an FAR of approximately 0.6:1 and maximum height of 50 feet. Option 2 would have an FAR of approximately 0.5:1 and all three industrial buildings would have a maximum height of 46 feet. As such, the Project would be consistent with the LAMC land use, FAR, and building height restrictions.

As discussed in Section II, Project Description, of this Draft EIR, Option 1 would include approximately 355,390 square feet of warehouse floor area and Option 2 would include approximately 320,056 square feet of warehouse floor area. As described in Section II, pursuant to LAMC Sections 12.24 U.14, 12.24 T, and 13B.2.3, the Applicant is requesting a Vesting Class 3 CUP for a Major Development Project in the M1 Zone which creates more than 250,000 square feet of warehouse floor area. As such, with the approval of the Vesting

Class 3 CUP, the Project would be consistent with applicable LAMC requirements.

Pursuant to LAMC Sections 16.05 and 13B.2.4, the Applicant is requesting a Project Review to permit the development of a project which creates or results in an increase of 50,000 square feet or more of non-residential floor area. As such, with the Project Review approval, the Project would be consistent with applicable LAMC requirements.

The M1 zone does not impose any setback requirements for commercial or industrial uses. However, the Project Site's "Q" Conditions require that an approximately 15-foot landscaped setback be provided along portions of the northern and western boundaries of the Project Site along Interceptor Street, respectively; the existing seven-foot landscaped setback along Interceptor Street on the east boundary be preserved and maintained; a minimum ten-foot landscaped setback be provided along both South Airport Boulevard and West Arbor Vitae Street; and a minimum five-foot setback be provided along the eastern property line contiguous to the R3-1 zone to include trees. In addition, the "Q" Conditions requires that no new building or structure be built within 50 feet of the northerly or easterly property line adjacent to or across the street from an R3-1 zoned lot. In compliance with the "Q" Conditions for the Project Site, the landscaping and building setbacks identified in Table IV.G-1 on page IV.G-40 would be provided. As such, the Project would be consistent with applicable LAMC setback requirements.

As discussed in Section II, Project Description, of this Draft EIR, the Project would include surface parking, with 274 vehicle spaces and 90 trailer parking spaces under Option 1, and 369 vehicle parking spaces, inclusive of 20 tandem spaces, under Option 2. In addition, pursuant to Ordinance No. 187,719 and Ordinance No. 186,485, 30 percent of the Project's parking spaces would be designated as EV spaces capable of supporting future EVSE with 20 percent of the spaces equipped with EV charging stations. Furthermore, in accordance with LAMC Section 12.21 A.16(a)(2), 44 short-term and 52 long-term for a total of 96 bicycle parking spaces would be provided under Option 1 and 41 short-term and 50 long-term for a total of 91 bicycle parking spaces would be provided under Option 2.

Based on the above, with approval of the requested discretionary actions outlined in Section II, Project Description, of this Draft EIR, 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) City of Los Angeles Coastal Transportation Corridor Specific Plan

The CTCSP includes purposes applicable to the Project. Specifically, the Project would support the purpose to encourage walking and bicycling as a means to safely and conveniently access transit and circulate within the neighborhood by enhancing pedestrian

**Table IV.G-1
Proposed Project Setbacks**

Required Minimum Setback	Option 1 Setbacks	Option 2 Setbacks
Landscaped Setbacks^a		
Interceptor Street (north)—15 feet	15.2 feet	45.6 feet
West Arbor Vitae Street (south)—10 feet	10.1 feet	11.2 feet
East Side of Project Site Adjacent to R3-1 Zone (east)—5 feet	16 feet	16.4 feet
Interceptor Street (east)—7 feet	45.5 feet	50.9 feet
South Airport Boulevard (west)—10 feet	10.1 feet	11.1 feet
Interceptor Street (northwest)—15 feet	42.5 feet	15.1 feet
Building Setbacks^b		
East Side—50 feet	50.2 feet	50.2 feet
North Side—50 feet	84.8 feet	50.6 feet
^a <i>Landscaped setbacks are required pursuant to “Q” conditions No. 3 and No. 4 included in Section 2 of Ordinance No. 151,439.</i> ^b <i>Building setbacks facing residential uses on the north and east of the Project Site are required pursuant to “Q” condition No. 15 included in Section 2 of Ordinance No. 151,439. As described therein, no building or structure to be built on the Project Site shall be located within 50 feet of the northern or eastern property line adjacent to or across the street from an R3-1 zoned lot.</i> <i>Source: Eyestone Environmental, 2025.</i>		

experience along the streetscape with extensive landscaping and new trees along all Project frontages. Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage to enhance the experience and safety for all users. In addition, the Project includes the development of a new, modern industrial center that would generate new employment opportunities in an area well-served by transit. Furthermore, the Project would also be located in close proximity to LAX’s cargo service providers and major regional roadways. Therefore, the Project would be consistent with the applicable purposes outlined in the CTCSP. Furthermore, the Project would not preclude the City from incorporating any transportation improvements identified in the CTCSP. Therefore, the Project would not conflict with the City of CTCSP.

(iv) Citywide Design

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. Not all of the Citywide Design Guidelines were adopted for the purpose of avoiding or mitigating an environmental effect, but are nevertheless included below for informational purposes.

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

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

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

With respect to Guidelines 1 and 3, under both options, the Project would promote a safe, comfortable and accessible pedestrian experience for all and actively engage with streets through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse building(s) including integration of fencing with planting along the perimeter of the site. The Project would include new landscaping and maintenance of existing landscaping along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard. These perimeter area and Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage. As previously discussed, the Project would provide a minimum 50-foot building setback along the northern and eastern portions of the site and retain and enhance the landscaped setbacks along the Project Site's boundaries as required by the applicable "Q" Conditions. Project lighting would incorporate low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. As required by "Q" Condition No. 15 and Project Design Feature AES-PDF-4, light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area. In addition, as discussed in Section II, Project Description, of this Draft EIR, the Project would implement a combination of physical and operational strategies intended to achieve a secure and safe working environment. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the privacy necessary for certain operational activities and to ensure pedestrian safety. In addition, points of entry would be secured by elements which may include guard booths key card passes, pedestrian and vehicular access controls, and site-wide lighting. Additionally, the Project would be designed such that entrances to and exits from the buildings, open spaces around the buildings, and pedestrian walkways would be open and in view of surrounding sites. Further, the building exterior(s) and walkways would be properly lit to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

With respect to Guideline 2, the Project would include pedestrian and bicycle access points separate from vehicular access points to minimize potential vehicle-pedestrian conflicts, avoid inhibiting the pedestrian experience, and increase pedestrian and bicycle safety. All new pedestrian entrances would be designed in accordance with LADOT

standards and ADA requirements. As discussed above, both Project options would provide extensive landscaping along the street frontages which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street. Further, all Project driveway designs would be subject to the approval of the LADOT and Los Angeles Bureau of Engineering.

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.

The Project would incorporate site planning and architectural strategies that would complement the scale and character of the surrounding neighborhood. Both Project options would include design features such as varied roof lines to break up the massing and create a more attractive and human-scale appearance. The Project would feature neutral colors, tinted glazing, and accent materials, and through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. The pedestrian walkways throughout the Project Site would be integrated with landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse or last-mile center. The Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site, and use the proposed building(s) and trees as buffers to the nearby residential uses. Further, the Project would provide a minimum 50-foot building setback along the northern and eastern portions of the Project site and would retain and enhance the existing landscaped buffers along the Project Site's northern and eastern boundaries as required by the applicable "Q" Conditions. As such, the Project would reduce its visual impact on the pedestrians, bicyclists, and vehicular traffic using these streets and the adjacent uses. Additionally, the Project would control lighting and construct the proposed buildings(s) with noise attenuation along the northern and eastern frontages, as required by the "Q" Conditions. In addition, the Project would shield Project lighting and focus it either downward or inward as required by the Project Design Feature AES-PDF-5 and the "Q" Conditions. Furthermore, while the Project would require the removal of two existing street trees under Option 1 and five existing street trees under Option 2, the remaining ROW trees would be preserved in accordance with applicable "Q" Conditions. Lastly, the proposed Project building heights would not be out of character with some of the existing adjacent development (such as with the two four-story apartment buildings on the north side of Interceptor Street). Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a Clear and Coherent Architectural Idea.

As previously discussed, the Project would transform the Project Site from an underutilized car rental facility and surface parking areas into a new, modern industrial center. As previously discussed, both Project options would include design features such as

varied roof lines to break up the massing and create a more attractive and human-scale appearance. Additionally, both Project options would provide extensive landscaping along the street frontages which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street. The Project would feature neutral colors, tinted glazing, and accent materials, and through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. The pedestrian walkways throughout the Project Site would be integrated with landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse center. Further, as illustrated in Figure II-3 and Figure II-4 on page II-8 and page II-9 of Section II, Project Description of this Draft EIR, the Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site rather than outward, and would use the proposed building(s) and trees as buffers to the nearby residential uses. All of these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea. Therefore, the Project would not conflict with Citywide Design Guideline 5.

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

As previously discussed in Guideline 3, the Project's landscaping and streetscape improvements have been designed to provide useable open space on-site, while at the same time enhancing the public realm and creating more effective transitions between on-site and off-site areas and uses. Therefore, the Project would not conflict with Citywide Design Guideline 6.

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

The Project would be implemented within the existing boundaries of the Project Site and would not introduce new features that would pose hazards to site users. The Project would incorporate fencing, walls, landscaping, and other elements to create a physical barrier at the perimeter of the Project Site to maintain the privacy necessary for certain operational activities and to ensure pedestrian safety. In addition, points of entry would be secured by elements which may include guard booths, key card passes, pedestrian and vehicular access controls, which, among other things, would prevent cut-through vehicular traffic through the Site. The Project would also be designed such that entrances to and exits from the building(s), open spaces around the building(s), and pedestrian walkways would be open and in view of surrounding sites. In addition, building exteriors and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building(s). Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment. Therefore, the Project would not conflict with Citywide Design Guideline 7.

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

The Project Site is an urban infill site located in an urbanized area that is surrounded by urban development and currently developed with an approximately 37,860-square-foot rental car facility including two buildings, several small accessory structures, canopies, and paved surface parking areas. The Project Site is relatively flat with limited ornamental landscaping. Existing landscaping within the Project Site includes 146 on-site non-protected trees and 14 street trees within the public right-of-way surrounding the Project Site. As part of the Project, a total of two existing street trees would be removed under Option 1 and five existing street trees would be removed under Option 2. However, in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153,500, the Project would replace the removed street trees at a 2:1 ratio. For on-site trees, per "Q" Condition No. 6, reasonable efforts be made to relocate for replanting any trees which are removed from the subject property, and further, would be replaced on-site at a 1:1 ratio. None of the on-site trees or street trees are considered protected by the City of Los Angeles Protected Tree and Shrub Regulation (Ordinance No. 186,873). Furthermore, the Project Site does not contain forest, natural open space, water bodies, water courses, wetlands, riparian vegetation, or special-status species habitat (see Section C, Biological Resources, of the Initial Study for analysis). Therefore, the Project would not conflict with Citywide Design Guideline 8.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project would support environmental sustainability by incorporating sustainable building features equivalent to Gold certification under the U.S. Green Building Council's LEED® Rating System for new construction and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. In addition, both in compliance with and, in some cases, in exceedance of code requirements, a number of specific sustainable design components would be incorporated into the Project, including but not limited to: Energy Star appliances; solar panels; continuous insulation and high-performance glazing and interior solar shades to reduce glare and minimize heating and cooling loads; skylights for natural daylighting of interior spaces, ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles, and 30 percent of the Project's automobile parking spaces would be designated as EV spaces capable of supporting future EVSE, with

20 percent of the spaces equipped with EV charging stations. Furthermore, as previously discussed, both Project options would provide extensive landscaping along the street frontages which would enhance the public realm and improve the pedestrian experience. Plantings would include resilient, drought-tolerant, California native, and adaptive tree, shrub, and groundcover species, including shade trees. Therefore, the Project would not conflict with Citywide Design Guideline 9.

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

The Project Site is already fully developed with urban uses, and, as such, there is no existing natural habitat on the Project Site. As discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat stormwater runoff in compliance with LID. As stated in the Drainage Report, included as Appendix IS-4 of the Initial Study, it appears that the Project Site currently discharges without any means of treatment. As such, implementation of LID BMPs as part of the Project would improve existing site conditions. Furthermore, the Project would include: (1) weather-based irrigation systems; (2) vegetated roofs; (3) green walls in certain outdoor areas; and (4) native, drought-tolerant landscaping and shade trees that offer ecological benefits and shaded spaces. Therefore, the Project would not conflict with Citywide Design Guideline 10.

(c) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis above and in Appendix G.1 of this Draft EIR, the Project would generally not conflict with policies, plans, or regulations 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 related to conflicts with applicable land use policies, plans, and regulations would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are four related projects in the vicinity of the Project Site. The related projects comprise a variety of uses, including residential, commercial, and airport-related uses. In addition, it should be noted that the Department of City Planning is currently updating the Westchester–Playa del Rey Community Plan. The Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Community Plan area until 2050. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2027, well before the Community Plan Update's horizon year.

As with the Project, the related projects would be required to comply with relevant land use plans, policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Specifically, as with the Project, the related projects would be required to comply with applicable land use regulations and City goals, objectives, and policies to reduce emissions during construction, as well as using clean materials and energy efficient appliances, consistent with the Los Angeles 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. In addition, as with the Project, all four of the related projects would be developed on urban infill sites within a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA) and a HQTC in close proximity to transit and major streets which have been designed to carry large volumes of traffic. Furthermore, the related projects would increase employment opportunities in the Project Site vicinity, provide needed housing and amenities, and/or activate the surrounding area, consistent with local and regional goals and objectives. Since the Project generally 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 required.

(3) Level of Significance After Mitigation

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