

IV. Environmental Impact Analysis

E. Land Use and Planning

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts with regard to conflicts with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

2. Environmental Setting

a. Regulatory Framework

(1) Local

Several plans, policies, and regulatory documents guide development within the Project Site. As described in Section II, Project Description, of this Draft EIR, the Project Site is located within the Hollywood Community Plan (Community Plan) area of the City of Los Angeles (City). The Community Plan constitutes the local land use policy standards of the City of Los Angeles General Plan (General Plan) for the Hollywood area, and the City of Los Angeles Municipal Code (LAMC) governs land use through specific development regulations and design standards. The Project Site is also located within the boundaries of the Hollywood Redevelopment Plan area, and the Vermont/Western Station Neighborhood Area Plan (Specific Plan). Applicable plans and associated regulatory documents and requirements are described below.

(a) City of Los Angeles General Plan

State planning and zoning laws (Government Code Section 65300) require that every city and county prepare and adopt a General Plan. The City's General Plan, originally adopted in 1974, is a comprehensive long-term document that provides principles, policies, and objectives to guide future development and to meet the existing and future needs of the City. A number of these principles, policies, and objectives serve to mitigate environmental effects. The General Plan consists of a series of documents which includes the seven elements mandated by the State of California: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Infrastructure Systems, Public Facilities and Services, Health and Wellness, as well as the Citywide General Plan

Framework Element (Framework Element). The General Plan's Land Use Element is comprised of 35 local area plans known as Community Plans that guide land use at the local level. As discussed above, the Project Site is located within the boundaries of the Hollywood Community Plan.

(i) City of Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

(1) Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts, and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. However, these land use categories do not connote land use entitlements or affect existing zoning for properties in the City and are intended to serve as guidelines for the Community Plans.¹ The Project Site is within a designated Community Center area.² A Community Center is defined as:

...a focal point for surrounding residential neighborhoods and containing a diversity of uses such as small offices and overnight accommodations, cultural and entertainment facilities, schools and libraries, in addition to neighborhood oriented services. Community Centers range from floor area ratios of 1.5:1 to 3.0:1. Generally the height of different types of Community Centers will also range from 2- to 6- story buildings, e.g., some will be 2-story Centers, some 4- or 6-story Centers depending on the character of the

¹ As indicated in Chapter 1 of the General Plan Framework, the General Plan Framework neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and Community Plans. The General Plan Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.

² General Plan Framework, Figure 3-1, Long Range Land Use Diagram—Metro.

surrounding area. Community Centers are served by small shuttles, local buses in addition to automobiles and/or may be located along rail transit stops.³

(2) Housing Chapter

The Housing Chapter of the Framework Element presents an overview of the critical issues related to housing in Los Angeles, provides goals to guide future action, and sets forth policies to address housing issues. The Framework Element Housing Chapter's overarching goal is to define the distribution of housing opportunities by type and cost for all residents of the City. The Framework Element Housing Chapter provides policies to achieve this goal through a number of measures:

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

(3) Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter establishes the goal of creating a livable City for existing and future residents that is attractive to future investment, and a City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales. Within this chapter, "urban form" is defined as the general pattern of building height and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, 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 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 updating the Community Plans. The Urban Form and Neighborhood

³ General Plan Framework, Figure 3-1, Long Range Land Use Diagram—Metro.

Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

(4) Open Space and Conservation Chapter

The Open Space and Conservation Chapter contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City's residents; and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City's open space issues. Specifically, this chapter contains open space goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

(5) Economic Development Chapter

The Economic Development Chapter seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods.

(6) Transportation Chapter

The goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the prior Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 (Mobility Plan) in August 2015. The Mobility Plan was readopted in January 2016 and amended in September 2016.⁴ Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan, which is discussed further below.

(7) Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems (many of which are interrelated), including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service

⁴ Los Angeles Department of City Planning, *Mobility Plan 2035*, amended September 2016.

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). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with applicable goals, objectives, and policies in the General Plan Framework is discussed in the impact analysis below under **Threshold (b)**. A detailed list of the goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is included in Table 1 of Appendix F of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal, objective, or policy.

(ii) Mobility Plan 2035

The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, the Mobility Plan incorporates "complete streets" principles. In 2008, the California State Legislature adopted AB 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:⁵

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

Each of the goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in the Mobility Plan is

⁵ Los Angeles Department of City Planning, *Mobility Plan 2035*, amended September 2016.

discussed in the impact analysis below under **Threshold (b)**. A detailed list of the goals, objectives, and policies of the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is included in Table 2 of Appendix F of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal, objective, or policy.

(iii) Los Angeles General Plan Conservation Element

The General Plan includes a Conservation Element. The Conservation Element incorporates natural open space, agricultural, and other open space features of the State's General Plan requirements and references other city plans that address mandated subjects, including water supply and demand, which is addressed by city water plans and the Infrastructure Systems Element. The Conservation Element also addresses archaeological, paleontological and mineral resources. The Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources.⁶

Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element established 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.⁷

The Project's consistency with applicable policies in the Conservation Element is discussed in the impact analysis Subsection 3.d.(3)(a)(ii) below.

(iv) Los Angeles General Plan Housing Element

Adopted in December 2013, the Housing Element 2013–2021 of the City's General Plan identifies four primary goals and associated objectives, policies, and programs. The goals are as follows:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs;

⁶ City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. I-2.

⁷ City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.

- A City in which housing helps to create safe, livable and sustainable neighborhoods;
- A City where there are housing opportunities for all without discrimination; and
- A City committed to ending and preventing homelessness.

The Project's consistency with the applicable goals, objectives, and policies set forth in the Housing Element of the General Plan is discussed in the impact analysis below under **Threshold (b)**. A detailed list of the goals, objectives, and policies of the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect is included in Table 3 of Appendix F of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal, objective, or policy.

(v) Hollywood Community Plan

The Community Plan is one of 35 community plans of the City that implements the land use policies of the Framework Element. Adopted on December 13, 1988, and readopted in 2014, the specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Hollywood community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

As shown in Figure IV.E-1 on page IV.E-8, the Community Plan's land use designation for the Project Site is Highway Oriented Commercial, within the C2-1 Zone (Commercial Zone). The C2 Zone permits with some exceptions uses allowed within the C1.5, C1, CR, R4, R3, R2, and R1 zones and permits mixed use development including commercial and multi-family residential uses on the Project Site, as discussed further below. The Community Plan allows a floor area ratio (FAR) of 1.5:1 for areas designated as Highway Oriented Commercial. As further discussed below, the Project also lies within the Hollywood Redevelopment Project area and within the Specific Plan which allows uses permitted within the C4 zone and allows a maximum FAR of 3:1. The Project's consistency with applicable goals, objectives, and policies in the Community Plan is discussed in the impact analysis below under **Threshold (b)**. A detailed list of the goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is included in Table 4 of Appendix F of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular objective or policy.



GENERAL PLAN LAND USE

COMMERCIAL

Highway Oriented Commercial

RESIDENTIAL

Highway Density Residential

Medium Residential

MANUFACTURING

Commercial Manufacturing

Figure IV.E-1

Land Use Designations for the Project Site and Vicinity

(1) Hollywood Community Plan Update

The most recent draft update of the Hollywood Community Plan was released for public review in February 2021.⁸ The proposed update seeks to achieve the following goals:

- Accommodate projected population, housing, and employment;
- Direct growth away from low-density neighborhoods; preserve single-family residential neighborhoods;
- Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's entertainment and tourism industries;
- Improve open space, parks and public spaces; provide adequate public services and infrastructure;
- Protect historic and cultural resources;
- Encourage and promote a variety of mobility options; make streets walkable;
- Improve the function and design of neighborhoods; focus on pedestrian experience;
- Encourage sustainable land use; and
- Maintain land use and zoning consistency.

The City Planning Commission recommended approval of the Hollywood Community Plan Update on March 18, 2021, but the plan has not yet been adopted.

(b) Community Redevelopment Agency of Los Angeles (CRA/LA) Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986, and most recently amended on October 31, 2003. The Redevelopment Plan was adopted to support the California Community Redevelopment Law and as such, was designed to improve economically and socially disadvantaged

⁸ The City of Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>). As of February 2021, under the current draft, the Project Site's land use designation is proposed to change to Community Commercial and zoning is proposed to change to [Q]C2-2D. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Hollywood Community Plan.

areas, redevelop or rehabilitate under or improperly utilized properties, eliminate blight, and improve the public welfare.⁹

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which involved challenging the constitutionality of AB X1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld AB X1 26, which therefore led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective February 1, 2012. ABX1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Redevelopment Plan and its requirements for development within the Redevelopment Area are still in effect.

As the City elected at that time not to become the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed and the Governor appointed its three-member board to wind down the operations of the former CRA/LA. From 2012 to 2019, the DLA implemented and enforced the requirements of the Redevelopment Plan. On November 11, 2019, Ordinance No. 186,325 became effective, which transferred the DLA's land use authority under the redevelopment plans to the City of Los Angeles Department of City Planning (DCP) and established a process by which DCP will review projects for consistency with applicable redevelopment plan regulations. Accordingly, this Draft EIR addresses the Project's consistency with the Redevelopment Plan and assumes its applicability until action from the City and/or DLA makes the Hollywood Redevelopment Plan no longer applicable to the Project Site.

The Hollywood Redevelopment Project Area (Redevelopment Area) encompasses approximately 1,107 acres and is bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west.¹⁰ The Project Site is located within the boundaries of the Redevelopment Area. The Redevelopment Plan Map, included as Exhibit A.1 to the Redevelopment Plan, designates the Project Site for Highway Oriented Commercial land uses.¹¹

⁹ *Community Redevelopment Agency of the City of Los Angeles, Redevelopment Plan for the Hollywood Redevelopment Project, as first amended on May 20, 2003 (Ordinance No. 175236).*

¹⁰ *CRA/LA, A Designated Local Authority, Hollywood Project Area Overview, www.crala.org/internet-site/Projects/Hollywood/, accessed February 18, 2021.*

¹¹ *This designation is consistent with the Community Plan's designation of Highway Oriented Commercial for the Project Site. Further, Section 502 of the Redevelopment Plan provides that "the land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time."*

According to the Redevelopment Plan, Highway Oriented Commercial uses shall generally provide neighborhood oriented goods and services such as; professional offices, institutional uses, food markets, laundries, dry cleaners, pharmacies and other neighborhood retail or service businesses.¹² Development in the Highway Oriented Commercial designation is limited to a FAR of 3:1.

The Project's consistency with applicable goals, objectives, and policies in the Redevelopment Plan adopted for the purpose of avoiding or mitigating an environmental effect is provided below in Subsection 3.d., Threshold (b),(1)(a)(ii).

(c) Vermont/Western Station Neighborhood Area Plan

The Specific Plan went into effect in March 2001. The Specific Plan encompasses a 2.2-square-mile area within the Hollywood and Wilshire communities of Los Angeles and was created for the purpose of making the neighborhood more livable and economically viable, as well as pedestrian and transit friendly in an effort to heal the community disruptions of the nineties, mitigate population growth, and achieve maximum benefit from the subway stations.¹³ The Specific Plan contains five subareas: Subarea A—Neighborhood Conservation, Subarea B—Mixed Use Boulevards, Subarea C—Community Center, Subarea D—Industrial/Commercial, and Subarea E—Community Facilities. The Project Site is located in Subarea C—Community Center. Properties in Subarea C are located along major commercial corridors, allow live/work and low impact manufacturing workshops, have a maximum height of 75 feet, a maximum FAR of 3.0:1, except for hospitals which have a maximum FAR of 4.5:1.¹⁴ Additionally, the Specific Plan allows uses permitted within the C4 zone and allows zero-foot setback requirements for residential uses. As set forth in the Specific Plan, when the Specific Plan differs from the LAMC, as is the case with the Project Site, the provisions of the Specific Plan shall prevail and supersede the applicable provisions of the LAMC, including permitted uses, floor area, height, and other regulations.

The Project's consistency with applicable goals, objectives, and policies in the Specific Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below under **Threshold (b)**. A detailed list of the goals, objectives, and policies of the Community Plan applicable to the Project Site is included in Table 5 of Appendix F of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular objective or policy.

¹² *Hollywood Redevelopment Plan, May 20, 2003.*

¹³ *Vermont/Western Specific Plan, March 2001.*

¹⁴ *Vermont/Western Specific Plan, March 2001, Map I.*

(d) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by DCP 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 are intended to "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design.

(e) Los Angeles Municipal Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Figure IV.E-2 on page IV.E-13, the entire Project Site is zoned as C2-1 (Commercial, Height District 1). The C2 zone permits a wide array of land uses, including retail stores, restaurants, amusement enterprises, auditoriums, studios, schools, and hospitals, as well as any land use permitted in the C1.5 (Limited Commercial) zones. The C1.5 zone allows for single-family, two-family, or apartment house uses permitted in the R4 (Multiple Dwelling) zones, and any land use permitted in the C1 zone. The C1 zone allows for uses permitted in the CR zone with some exceptions and any residential use permitted in the R4 (Multiple Dwelling) zone. Permitted uses in the CR zone include banks, clubs, hotels, churches, schools, business and professional colleges, childcare, and parking areas. Under the C2 zone, there are no front, side, or rear yard requirements, except for residential buildings, which shall conform to the requirements of the R4 zone.¹⁵ Height District 1 within the C2 zone imposes no height limitation and permits a maximum FAR of 1.5:1.

¹⁵ *The Specific Plan, discussed above, supersedes the LAMC and does not include front, side, or rear yard setback requirements.*

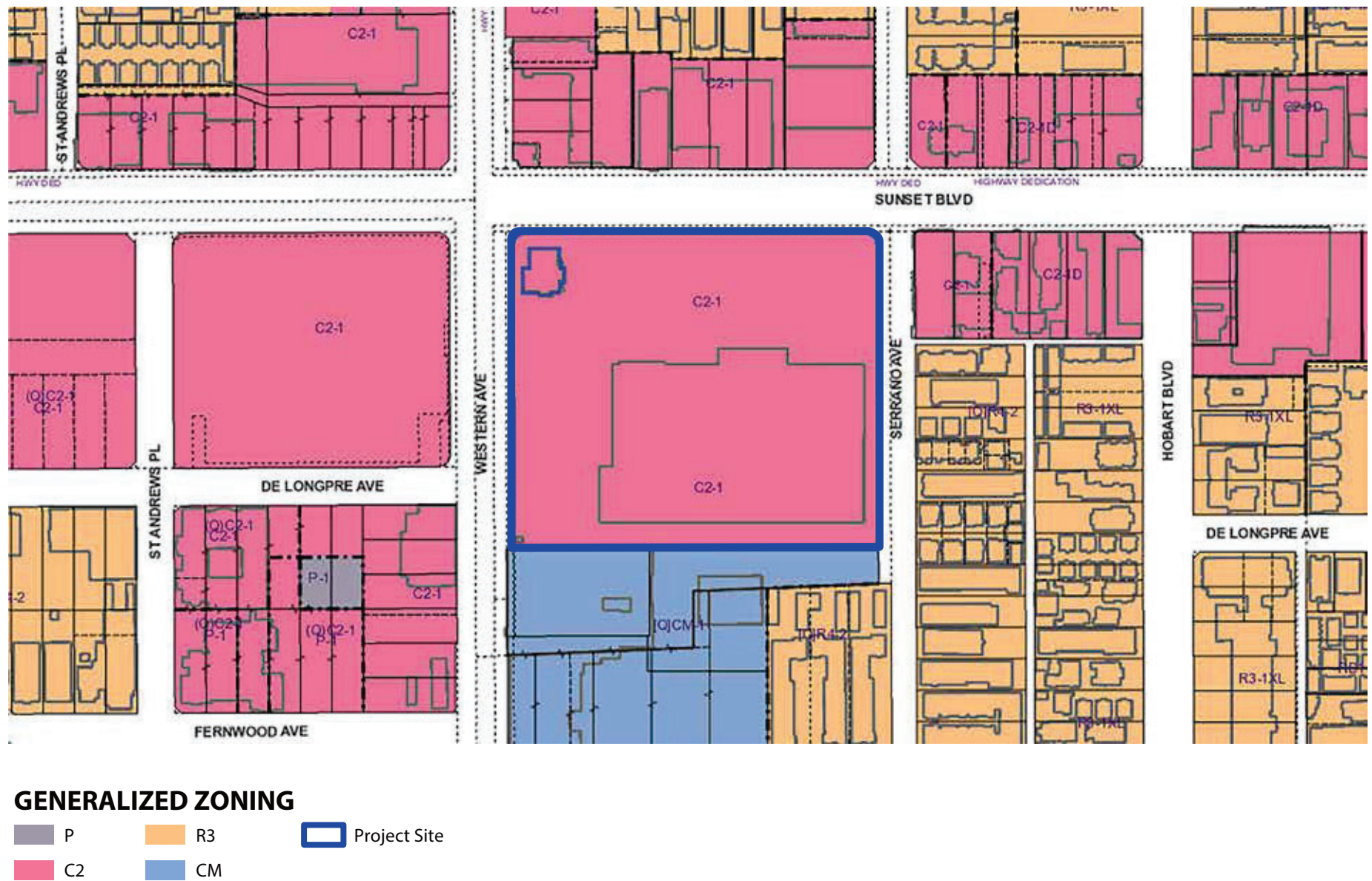


Figure IV.E-2
Zoning Designations for the Project Site and Vicinity

(f) Other City of Los Angeles Environmental Policies, Ordinances, and Plans

The City of Los Angeles has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), Los Angeles Department of Water and Power (LADWP) 2015 Urban Water Management Plan (UWMP), the City of Los Angeles Sustainable City pLAn/L.A.'s Green New Deal, and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR (i.e., Section IV.D, Greenhouse Gas Emissions; IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure; IV.K.2, Utilities and Service Systems—Wastewater; and IV.K.3, Utilities and Service Systems—Energy Infrastructure), and in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR.

(g) Transit Priority Area in the City of Los Angeles

In September 2013, California Governor Edmund G. “Jerry” Brown signed Senate Bill (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 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.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

The Project is a mixed-use residential project and is located on an infill site. The Project Site is also located approximately 0.25 mile south from an existing major transit

stop (i.e., the Los Angeles County Metropolitan Transit Authority [Metro] Hollywood and Western Station, which serves the B (Red) Line). Therefore, the Project is located in a transit priority area. As such, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.

*(h) City of Los Angeles Advisory Notice for Freeway-Adjacent Projects,
Zoning Information File No. 2427*

The City of Los Angeles City Planning Commission issued an advisory notice, Zoning Information File No. 2427 (ZI No. 2427) Freeway Adjacent Advisory Notice for Freeway-Adjacent Projects, effective September 17, 2018, regarding siting sensitive land uses in proximity to freeways. ZI No. 2427 notes a strong link between chronic exposure of populations to vehicle exhaust from roads and freeways and elevated risk of adverse health impacts, and identifies project features and design considerations that should be taken into account with development occurring within 1,000 feet of a freeway. ZI No. 2427 is informational in nature and does not impose any additional land use or zoning regulations, it is intended to inform project applicants of the importance of this issue. Although the City does not require a health risk assessment (HRA) for purposes of California Environmental Quality Act (CEQA) compliance, in light of ZI No. 2427 and the concerns with development in proximity to freeways, and to inform decision making associated with the Project's site planning and design, a quantitative HRA was prepared for the Project to disclose potential impacts associated with the siting of the Project near the Hollywood Freeway (US-101), which, is located less than 1000 feet north of the Site's northeastern property line. (See Appendix G, Health Risk Assessment of this Draft EIR.)

The Freeway Adjacent Advisory Notice also notes Articles 5 and 9 of Chapter IX of the LAMC addressing sources of outside air in buildings, which requires all new mechanically ventilated buildings located within 1,000 feet of the freeway to install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13.

In addition, the City adopted Ordinance No. 184,245 in 2016, which, among other things, requires the provision of air filtration media for regularly occupied areas of buildings located within 1,000 feet of a freeway that achieves a Minimum Efficiency Reporting Value (MERV) of 13.¹⁶

ZI File No. 2427, effective September 2018 includes the following recommendations:

¹⁶ *The City Planning Commission policy in the ZI File No. 2427, which was issued on November 8, 2012, required a MERV of 11 or higher for Projects within 1,000 feet of a freeway; however, Ordinance No. 184,245, which was issued on June 4, 2016, requires a MERV of 13 or higher for projects within 1,000 feet of a freeway.*

1. Avoid locating the following sensitive uses within the project: schools, day care facilities, and senior care centers.
2. Locate occupied open space areas (play areas, courtyards, patios, balconies, etc.) as far from the freeway sources as possible when the size of the site permits.
3. Prioritize the location of non-habitable uses, such as parking structures and building areas not calculated in floor area, nearest the freeway.
4. Screen the project site with substantial vegetation and/or a wall barrier.

(2) Regional

Regional land use plans that govern the Project area include the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the 2020–2045 RTP/SCS, and the South Coast Air Quality Management District’s (SCAQMD) Air Quality Management Plan (AQMP), which addresses the attainment of State and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

(a) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality. SCAG’s 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. As part of this new approach, the 2016–2040 RTP/SCS establishes commitments to develop a SCS to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing and environmental planning in order to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS). The 2016–2040 RTP/SCS also establishes High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.^{17,18}

Subsequent to the publication of the Project's Notice of Preparation (NOP), on September 3, 2020, SCAG's Regional Council adopted its 2020–2045 RTP/SCS, Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.¹⁹ The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.²⁰ As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the NOP for the Project on June 28, 2017, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS. The Project's consistency with the applicable goals of the 2016–2040 RTP/SCS is discussed in the impact analysis below under **Threshold (b)** and a detailed list of the goals of the 2016–2040 RTP/SCS applicable to the Project Site is included in Table 6 of Appendix F of this Draft EIR.

(b) South Coast Air quality Management District Air Quality Management Plan

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, SCAQMD has prepared the 2016 AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South

¹⁷ SCAG, *The 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life*, adopted April 2016, Exhibit 5.1.

¹⁸ Los Angeles County Metropolitan Transportation Authority (Metro), "High Quality Transit Areas—Southwest Quadrant."

¹⁹ SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

²⁰ For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within a High-Quality Transit Area (HQTA), would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.

Coast Air Basin. Refer to Section IV.A, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the AQMP.

b. Existing Conditions

(1) Project Site

As discussed in the Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by a one-story grocery store, vacant commercial space, and a one-story fast-food restaurant along with associated parking areas. Pole signs are located along Sunset Boulevard to identify the grocery store and the fast-food restaurant. Landscaping within the Project Site includes trees and bushes located throughout the parking areas, including 65 non-protected trees. Several street trees are also located adjacent to the Project Site along Sunset Boulevard, Serrano Avenue, and Western Avenue.

As noted above, the Project Site is zoned by the LAMC as C2-1 (Commercial, Height District 1) and designated for Highway Oriented Commercial land uses in the Community Plan. The Project Site is also located in Subarea C, Community Center, of the Specific Plan area, which allows maximum building heights of 75 feet and a maximum FAR of 3:1 for mixed-use projects. Subarea C also permits commercial uses permitted in the C4 (Commercial) zone and residential uses permitted in the R4 (multiple dwelling) zone, which includes high density for sale or for-rent housing.

(2) Surrounding Uses

As shown in the aerial photograph in Figure II-3 in Section II, Project Description, of this Draft EIR, the Project Site is located in an urbanized area, which includes a mixture of low- and mid-rise buildings occupied primarily by commercial and residential uses. Specific uses surrounding the Project Site include a small retail center, the Upright Citizens Brigade Theatre, an inn, and a five-story multi-family residential building with retail to the north on Sunset Boulevard; retail and residential uses to the east on Serrano Avenue; the former site of Deluxe Laboratories, a motion picture film processing laboratory, to the south; and a recently constructed Target store to the west on Western Avenue. In the vicinity of the Project Site, the major arterials such as Sunset Boulevard and Western Avenue are generally developed with dense residential and commercial development, while lower density mixed-use and residential areas are located along the adjacent collector streets, including Serrano Avenue.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community;

Threshold (b): Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect;

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate land use:

(1) Land Use Consistency

The *L.A. CEQA Thresholds Guide* states that the determination of potential significance regarding land use consistency shall be made on a case-by-case basis, considering the following factors:

- 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.

(2) Land Use Compatibility

The *L.A. CEQA Thresholds Guide* states that the determination of significance associated with land use compatibility shall be made on a case-by-case basis, considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and

- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

b. Methodology

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

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

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

c. Project Design Features

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

d. Analysis of Project Impacts

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

As discussed in Section IV, Other CEQA Considerations, and in the Initial Study included as Appendix A to this Draft EIR, the Project Site is located in an urbanized area

characterized primarily by low- to mid-rise buildings that are occupied primarily by commercial and residential uses. Specific uses surrounding the Project Site include a small retail center, the Upright Citizens Brigade Theatre, an inn, and a five-story multi-family residential building with retail to the north, along Sunset Boulevard; retail, single-, and multi-family residential uses to the east, along Serrano Avenue; the former site of Deluxe Laboratories, a motion picture film processing laboratory which is now a commercial office building, to the south; and a recently constructed Target store and a restaurant to the west, along Western Avenue. In the vicinity of the Project Site, the major arterials such as Sunset Boulevard are generally developed with dense residential and commercial development, while lower density mixed-use and residential areas are located along the adjacent collector streets, including Serrano Avenue. The Project would be constructed within a previously developed site which would not divide an established community. Specifically, there is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project as development of the Project would occur within the boundaries of the existing Project Site, which would not affect the continued functioning of, access to, or otherwise obstruct aspects of the physical linkages between surrounding land uses and this part of the community. Furthermore, the Project Site is located within an existing established community and will utilize existing infrastructure such as established streets and pedestrian circulation. The Project would provide connections with ground-level pedestrian paseo and a plaza that would include paving materials, raised planters, outdoor dining areas, and landscape elements. **Therefore, the Project would not physically divide an established community. Impacts would be less than significant, and no mitigation measures are required.**

Threshold (b): Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) 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 the goals, objectives, and policies of the General Plan, including the Framework Element, Conservation Element, Housing Element, and the Mobility Plan; the Community Plan, Redevelopment Plan, and the Specific Plan.

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

The Project's general consistency with the applicable objectives and policies that support the goals set forth in the Land Use Chapter, Housing Chapter, Open Space and Conservation Chapter, Economic Development Chapter, and Infrastructure and Public Services Chapter of the Framework Element are discussed in detail in Table 1 of Appendix F of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Land Use Chapter

The Framework Element Land Use Diagrams designate districts, centers and mixed-use boulevards. The Project Site is located in an area that is identified as a Community Center on the General Plan Framework's Long Range Land Use Diagram for the City's Metro area. The Project would support and would be generally consistent with the Framework Element Land Use Chapter. The Project would contribute to the City's existing and future residents, businesses, and visitors by providing 735 residential units and up to 95,000 square feet of neighborhood serving commercial uses, including restaurant and market/retail uses. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote a reduction of vehicle trips, vehicle miles traveled, and air pollution while supporting the City's objective to encourage new multi-family residential, retail and commercial, along primary transit corridors/boulevards. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Land Use Chapter of the Framework Element.**

(ii) Housing Chapter

The Project would not conflict with the relevant objectives that support the goals of the Housing Chapter of the Framework Element. Specifically, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating 735 new multi-family residential units in an area well-served by public transit provided by Metro and LADOT DASH, including bus stops along Sunset Boulevard and proximity to the Metro B (Red) Line Hollywood and Western Station which is located approximately 0.25 mile north of the Project Site. **Therefore, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Housing Chapter.**

(iii) Open Space and Conservation Chapter

The Project would not conflict with the relevant goals, objectives, and policies of the Open Space and Conservation Chapter of the Framework Element. The Project would meet the required open space area as set forth by the LAMC by providing approximately 96,800 square feet of open space, including landscaped courtyards, a public plaza fronting Sunset Boulevard, and a landscaped paseo at the ground level that would be publicly accessible from Sunset Boulevard. The Project would also provide publicly accessible open space within the ground floor retail plaza as well as a plaza at the corner of Sunset Boulevard and Western Avenue and private open space areas within the residential uses on Levels 2 and 3. The Project features a variety of publicly accessible ground-level open space and recreational amenities for on-site residents which would also contribute to the open space resources of the neighborhood. Specifically, at the ground level, the Project would provide a pedestrian paseo and two plazas that would include paving materials, raised planters, outdoor dining areas, and landscape elements that would enhance the Sunset Boulevard streetscape adjacent to the Project Site. The paseo and the plaza would be publicly accessible from adjacent sidewalks which would maintain standard widths, as required by the City. Specifically, the sidewalks along Sunset Boulevard and Western Avenue would be widened to approximately 15 feet in width and the sidewalk along Serrano Avenue would be widened to approximately 12 feet in width. Each building would be oriented around an open space courtyard with shared amenities for the residents that would include multiple terraces with swimming pools, spas, cabanas, multiple lounge and seating areas, paseos with water and landscape elements, a fitness courtyard, outdoor fireplaces, and outdoor kitchens. These courtyards would be provided at the podium level for Buildings 1 and 2 and at Level 2 for Buildings 3 and 4. Additionally, a dog park would be located on Level 2 and private patios would be provided throughout the residential development. Indoor recreation areas would be located on the third and fourth levels. An outdoor rooftop terrace is proposed atop the recreation building with multiple lounge areas and landscaping. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the General Plan Framework's Open Space and Conservation Chapter.**

(iv) Economic Development Chapter

The Project would not conflict with the relevant objectives and policies that support the goals of the Economic Development Chapter of the Framework Element. The Project would introduce a mixed-use development within the Project Site, including the development of 735 residential units and neighborhood-serving commercial uses, including restaurant and market/retail uses, in an area well served by existing infrastructure and public transit. **Thus, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Economic Development Chapter.**

(v) Infrastructure and Public Services Chapter

The Project would not conflict with the relevant objectives and policies that support the goals of the Infrastructure and Public Services Chapter of the Framework Element. The Project would include the addition of landscaped areas throughout the Project Site and would not increase the percentage of impervious surfaces on-site. Approximately 95 percent of the Project Site currently consists of impervious surface area, and with implementation of the Project, the amount of impervious surfaces would continue to be approximately 95 percent of the Project Site. A stormwater pollution prevention plan (SWPPP) during construction would be implemented and would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the standard urban stormwater mitigation plan (SUSMP). Such BMPs would result in an improvement in surface water quality runoff from the Project Site. Furthermore, as discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. The Project also would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Infrastructure and Public Services Chapter of the Framework Element.**

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

(2) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 2 of Appendix F of this Draft EIR.

The Project would not conflict with the relevant objectives and policies that support the goals of the Mobility Plan. Specifically, the Project would support all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. The Project would promote walkability in the vicinity of the Project Site through the inclusion of various streetscape improvements such as wider sidewalks, additional trees, landscaping, and publicly accessible paseos and plazas. Specifically, the sidewalks along Sunset Boulevard and Western Avenue would be widened to approximately 15 feet in width and the sidewalk along Serrano Avenue would be widened to approximately 12 feet in width, and new street trees would be planted. Furthermore, the Project would promote alternative modes of transportation by providing a total of approximately

548 bicycle parking spaces, including 472 long-term spaces and 76 short-term spaces. In addition, given the location of the Project Site in proximity to major thoroughfares and public transit options, the Project would provide residents, workers, and visitors with access to transit services. Furthermore, the Project would also support the City's policy to provide for safe passage of all modes of travel during construction by implementing a Construction Traffic Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan.**

(3) Los Angeles General Plan Conservation Element

As identified in Subsection 2.a.(1)(a)(ii) above, the Conservation Element established 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.

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. The Project Site is located in an urbanized area and is currently developed with commercial uses and parking areas. Only ornamental trees and landscaping exist on the Project Site, and none of the trees are protected as defined in the LAMC. Due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area and no water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site.

As discussed in detail in Section IV.B, Cultural Resources, of this Draft EIR, there are no historical resources located within the Project Site, and the identified historical resources in the immediate vicinity of the Project Site would not be physically altered by the Project. With respect to archeological resources, while the Project Site is considered highly

sensitive for the presence of buried historic period archaeological resources, impacts would be less than significant with the implementation of Mitigation Measures CUL-MM-1 through CUL-MM-3. Similarly, as discussed in the Initial Study included as Appendix A of this Draft EIR, deeper excavations in the Project Site have the potential to encounter previously unidentified paleontological resources. However, impacts would be less than significant with the implementation of Mitigation Measure GEO-MM-1.²¹ Lastly, as discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no tribal cultural resources have been identified on the Project Site and impacts to tribal cultural resources would be less than significant. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element.**

(4) Los Angeles General Plan Housing Element

The Project's consistency with the applicable goals, objectives, and policies set forth in the Housing Element of the General Plan is discussed in detail in Table 3 of Appendix F of this Draft EIR.

The Project would support the City's objectives and policies for ensuring an adequate supply of rental housing and promoting sustainable neighborhoods with a mix of uses by providing 735 new multi-family residential units consisting of 251 studios, 336 one-bedroom units, and 148 two-bedroom, along with neighborhood-serving commercial uses in an urbanized area with similar land uses. The Project Site is located in close proximity to existing public services, facilities, and infrastructure, in addition to a variety of public transit options. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy, water usage, and waste generation, thereby reducing associated greenhouse gas emissions and minimizing the impact on natural resources and infrastructure. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Housing Element of the City's General Plan.**

(5) Hollywood Community Plan

The Project's general consistency with the objectives and policies set forth in the Community Plan is discussed in detail in Table 4 of Appendix F of this Draft EIR.

²¹ *At the time the Initial Study was published, the Appendix G thresholds addressed paleontological resources under the Cultural Resources section and the paleontological mitigation measure was numbered "CUL-MM-1." Paleontological resources are now evaluated as part of the Geology and Soils section and the mitigation measure has been renamed accordingly.*

As previously discussed, the land use designation for the Project Site under the Community Plan is Highway Oriented Commercial. The Project would be generally consistent with the objectives and policies that support the goals of the Community Plan. Specifically, the Project would support the City's objectives and policies to promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit. The Project would introduce 735 new multi-family residential units consisting of a mix of studio, one- and two-bedroom units that would provide additional housing in the Hollywood community. The Project would also support the City's objectives and policies to expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.

With regard to Community Plan Objective 5, as discussed in Section IV.H.1, Public Services—Fire Protection, Section IV.H.2, Public Services—Police Protection, Section IV.H.3, Public Services—Schools, Section IV.H.4, Public Services—Libraries, Section IV.H.5, Public Services—Parks and Recreation, Section IV.I, Transportation/Traffic, Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, Section IV.K.2, Utilities and Service Systems—Wastewater, and IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, the agencies that provide services and utilities to the Project Site would have capacity to serve the Project. As such, the Project would support the City's objectives and policies for ensuring that public services and utilities are adequate to support development in the Hollywood community. The Project's provision of open space and recreational amenities within the Project Site would also support the City's objectives and policies for encouraging open space. Specifically, the Project would provide a variety of open space and recreational amenities totaling 96,800 square feet of open space, 19,300 square feet of which would be at the ground level, which would exceed the requirements set forth in the Specific Plan of 77,200 square feet. Furthermore, the Project would support the City's objectives and policies for ensuring a circulation system adequate to accommodate traffic and to encourage the expansion and improvement of public transportation service by concentrating new development along Sunset Boulevard, which is well-served by public transit provided by Metro and LADOT, including bus stops along Sunset Boulevard and the Hollywood and Western Metro B (Red) Line Station located approximately 0.25 mile from the Project Site. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Hollywood Community Plan.**

(ii) Community Redevelopment Agency of Los Angeles (CRA/LA) Hollywood Redevelopment Plan

The Project Site is currently designated as Highway Oriented Commercial by both the Community Plan and the Redevelopment Plan. The Project would construct a mixed-use development consisting of residential uses and neighborhood-serving commercial uses. According to the Redevelopment Plan, Highway Oriented Commercial uses shall generally provide neighborhood oriented goods and services. Thus, the commercial land

uses proposed by the Project would be consistent with the existing Highway Oriented Commercial land use designation. Additionally, Section 502 of the Redevelopment Plan provides that “the land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time.” As such, because the proposed mixed used development consisting of multi-residential and commercial uses are consistent with the General Plan, Community Plan, Specific Plan, and LAMC, they are permitted under the Redevelopment Plan.

As set forth in the Redevelopment Plan, the Highway Oriented Commercial designation allows development at a FAR of 3:1. As discussed in detail below, the Project would result in a total FAR of up to 3:1. Therefore, the Project would be consistent with the FAR of 3:1 permitted under the Highway Oriented Commercial land use designation in the Redevelopment Plan.

Section 300 of the Redevelopment Plan sets forth 16 goals for the Redevelopment Plan. Of these, the goals applicable to the Project include:

- Goal 3—Promote a balanced community meeting the needs of the residential, commercial, industrial, arts, and entertainment sectors;
- Goal 9—Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choices which meet the needs of the resident population;
- Goal 10—Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood; and
- Goal 12—Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.

To Project would contribute to the attainment of these goals. Specifically, the Project would contribute to the achievement of Goal 3 by providing a mix of multi-residential and neighborhood-serving commercial uses that would promote a balanced community within the Redevelopment Area. The Project would contribute to Goal 9 by providing 735 new residential units consisting of 251 studio units, 336 one-bedroom units, and 148 two-bedroom units. Thus, the Project would increase the supply of housing in the Hollywood community, provide additional housing choices, and improve the quality of

housing for a range of household types within the Redevelopment Area. In conformance with Goal 10, the Project would provide new mixed-use development on an infill site in conformance with the Redevelopment Plan's use and density standards, without intruding on nearby residential neighborhoods. Moreover, as discussed in Section IV.H.1, Public Services—Fire Protection; Section IV.H.2, Public Services—Police Protection; Section IV.H.3, Public Services—Schools; Section IV.H.4, Public Services—Libraries; Section IV.H.5, Public Services—Parks and Recreation; Section IV.I, Transportation; Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure; Section IV.K.2, Utilities and Service Systems—Wastewater; and Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, public facilities would not be significantly impacted by the Project, and the Project would provide on-site open space and recreational amenities to support its residents and visitors. Furthermore, the Project would support Goal 12 by promoting the use of public transportation and a reduction in vehicle miles traveled by concentrating new development in an area well-served by public transit. Metro and LADOT would provide a variety of transit options to Project residents and visitors, including bus lines along Sunset Boulevard and the Hollywood and Western Metro B (Red) Line Station located approximately 0.25 mile north of the Project Site. The Project would also provide a total of 548 bicycle parking spaces, including 472 long-term spaces and 76 short-term spaces that would promote the use of non-motorized transportation. **Based on the analysis above, the Project would not conflict with the applicable goals, objectives, and policies Redevelopment Plan.**

(iii) Vermont/Western Station Neighborhood Area Station Neighborhood Area Plan

The Project's general consistency with the objectives and policies set forth in the Specific Plan is discussed in detail in Table 5 of Appendix F of this Draft EIR.

The Project would be consistent with the applicable development standards and design guidelines of the Specific Plan. The Project has been designed to conform with these design guidelines, including the Project's pedestrian thoroughways, facade relief and treatments, transparent building elements, ground floor commercial uses with appropriate setbacks, signage, lighting, and shielding of mechanical equipment.

The Project would introduce new landscaping and open space uses throughout the Project Site in accordance with the applicable development standards and design guidelines of the Specific Plan. The Project would provide 96,800 square feet of open space, which exceeds the 77,200 square feet required by the Specific Plan by 19,600 square feet. The Project's inclusion of a paseo, plazas, new street trees, outdoor

seating, and bicycle racks would support the Specific Plan's purpose of creating a pedestrian friendly environment.²²

Under the Community Plan, the Project Site is designated for Highway Oriented Commercial land uses within the C2-1 Zone (Commercial Zone). The C2 Zone permits with some exceptions uses allowed within the C1.5, C1, CR, R4, R3, R2, and R1 zones and permits mixed use development including commercial and multi-family residential uses on the Project Site. Footnote 12 of the Community Plan land use map allows a FAR of 1.5:1 for properties designated Highway Oriented Commercial and within the Hollywood Redevelopment Project area. However, the Specific Plan permits a maximum FAR of 3:1, and when the Specific Plan differs from the LAMC, as is the case with the Project Site, the provisions of the Specific Plan shall prevail and supersede the applicable provisions of the LAMC, including permitted uses,²³ floor area, height, setbacks, and other regulations. The proposed FAR of 3:1 would be consistent with the Specific Plan, which supersedes the LAMC. Additionally, the Project's maximum building height of 75 feet would conform with the Specific Plan's guidelines.

Parking for the proposed uses would be provided in accordance with LAMC requirements (LAMC Sections 12.21.A.4 and 12.21.A.4.(x)(3)) and the Specific Plan. The Project includes a total of 1,419 vehicle parking spaces, which is the maximum number of spaces permitted by the Specific Plan. Based on the proposed unit mix, the maximum parking permitted for the residential uses is 1,051 spaces and 368 guest parking spaces. For the commercial uses, the maximum number of commercial spaces is two parking spaces for each 1,000 square feet. A maximum of 190 spaces is permitted for the Project's proposed commercial uses (95,000 square feet divided by 500). As set forth in the Specific Plan, in a mixed-use project the guest parking required for the residential uses shall be provided through shared use of required commercial parking spaces. In addition, the Project provides a total of approximately 548 bicycle parking spaces, including 472 long-term spaces and 76 short-term spaces, in excess of Specific Plan requirements.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the Specific Plan.

²² *Vermont Western Station Neighborhood Area Plan Development Standards and Design Guidelines, Ordinance No. 173749, p. 14.*

²³ *The Specific Plan allows uses permitted within the C4 zone.*

(vi) *City of Los Angeles Freeway Adjacent Advisory Notice for Sensitive Uses*

As noted above, the Project would introduce residential uses within 1,000 feet of US-101. Thus, in compliance with the recommendations of ZI File No. 2427, an HRA was conducted to assess the potential health risks from both criteria pollutants and toxic air contaminants (TACs) that residents may experience due to the Project Site's proximity to the freeway. The complete HRA, prepared by Air Quality Dynamics, is provided in Appendix G of this Draft EIR.²⁴ As discussed therein, the carcinogenic risk estimate for sensitive receptors on the Project Site would result in a maximum risk of 0.9 in one million and less than the SCAQMD significance threshold of 10 in one million. It is noted that the calculation of risk does not include implementation of requirements under the City's adopted Ordinance No. 184,245, which, among other things, requires the provision of air filtration media that achieves a MERV of 13 for regularly occupied areas of buildings located within 1,000 feet of a freeway. MERV 13 filtration removes 90-percent of PM₁₀ and 85-percent of PM_{2.5}. From a diesel particulate standpoint, MERV 13 removes approximately 85 percent of the risk associated with diesel particulate. Furthermore, as discussed in detail in Section IV.A, Air Quality, of this Draft EIR, maximum NO₂, CO, PM₁₀ and PM_{2.5} concentrations were predicted to be within acceptable limits for all residential occupancies. **As maximum predicted concentrations for criteria pollutants and TACs were predicted to be within acceptable limits, less than significant impacts would be anticipated to residents and individuals on the Project Site.**

(b) *Consistency with Regional Plans*

The Project's general consistency with the applicable goals, objectives, and policies set forth in the is discussed in detail in Table 6 of Appendix F of this Draft EIR. As detailed therein, the Project would be consistent with the whole of applicable goals, objectives, and policies set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines and the Metro B (Red) Line subway. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project

²⁴ The HRA, included as Appendix G of this Draft EIR, evaluated impacts with a buildout year of 2024. The Project's buildout year is now 2026. However, air quality analyses presume air quality improves over time, so 2024 represents a more conservative scenario.

Site's location within a SCAG-designated HQTAs and TPAs, as defined PRC Section 21099. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within an HQTAs, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS, the Project would also be consistent with the 2020–2045 RTP/SCS. **Therefore, the Project would not conflict with the applicable goals, objectives, and policies of SCAG's RTP/SCS.**

(c) Conclusion

Based on the analysis provided above, the Project would not conflict with applicable goals, policies, and objectives in local and regional land use plans that were established to avoid or mitigate environmental effects. **As such, impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) Physically Divide a Community

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 100 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, commercial, office, restaurant, retail, school, studio, entertainment/theme park, hotel, and combinations thereof. As such, similar to the Project, the proposed construction associated with the related projects would be confined to the related projects' individual sites and would not cumulatively combine with the Project to physically divide a community. Impacts with respect to physical division of a community would be determined on a case by case basis, but as discussed above, there is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project as development of the Project would occur within the boundaries of the existing Project Site, which would not affect the continued functioning of, access to, or otherwise obstruct aspects of the physical linkages between surrounding land uses and this part of the community and Project-level impacts would be less than significant. **Therefore, cumulative impacts with respect to physical division of a community would not be cumulatively considerable and cumulative impacts would be less than significant.**

(b) Conflict with Land Use Plans

Impacts with respect to conflicts with land use plans are generally project-specific. However, as with the Project, the related projects would be required to comply with relevant land use policies and regulations. Additionally, in support of the City's goal to reduce VMT, the related projects would also be required to implement various methods to promote alternative modes of transportation, such as providing bicycle parking spaces in accordance with the LAMC, which is a City requirement. Furthermore, most of the related projects are residential/mixed use projects located in the vicinity of the Project Site would also be located in a TPA/HQTA in furtherance of local and regional policy goals discussed throughout this section, and thus would not be anticipated combine with the project to result in conflicts with applicable land use plans. Finally, as discussed above, Project-level impacts with respect to conflicts with land use plans would be less than significant. **Therefore, cumulative impacts with respect to conflicts with land use plans would be less than significant.**

(2) Mitigation Measures

Cumulative impacts would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.