

Land Use Policy Consistency Tables

## **Environmental Impact Analysis**

## **IV.H Land Use and Planning**

## 1. Land Use Tables

## Table IV.H-1

Project Conflicts with Applicable Goals of the 2020-2045
Regional Transportation Plan and Sustainable Communities Strategy

Goals, Principles, and Strategies	Conflicts Analysis
Goals	
Goal 1 Encourage regional economic prosperity and global competitiveness.	Not Applicable. This goal is directed towards the Southern California Association of Governments (SCAG) and the City of Los Angeles (City) and thus does not apply to individual development projects. However, the Project would retain the existing building formerly occupied by the Architecture and Design (A+D) Museum¹ and would construct office and restaurant space in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California by creating employment opportunities and generating revenue.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	No Conflict. The Project Site is located in a highly urbanized area in the City and would retain the existing building formerly occupied by the A+D Museum and develop office and restaurant space providing employment opportunities within a High Quality Transportation Area as defined by SCAG, within a Transit Priority Area (TPA) as defined by Senate Bill 743, and in close proximity to existing residential units, as well as other commercial sources of employment, including shops, restaurants, warehouses, and auto repair-related businesses. The Project would allow for accessible and reliable modes of travel for employees and customers of the proposed uses as an inherent aspect of the Project Site's proximity to transit facilities (the Los Angeles County Metropolitan Transportation Authority [Metro] L [Gold] Line Little Tokyo/Arts District Station located one-half

At the time that the Notice of Preparation for the Project was issued (September 20, 2017), the CEQA Baseline for the Project, the building was occupied by the A+D Museum. In the summer of 2020, the A+D Museum moved out of the building and began operating virtually. The building is currently vacant. While there are no plans for reoccupation as of the date of this Draft EIR, it is anticipated that the building would be re-occupied with a use that is consistent with recent uses, such as the A+D Museum, for which the building interior is customized. The Project's requested discretionary approvals would not physically alter the 7,800-sf building. The Project's proposed C2-2-RIO zoning would allow for a similar range of commercial land uses as compared to the existing M3-1-RIO zoning. The proposed change in zoning would not expand or increase the intensity of the allowable uses within the building. The zoning change of the Project would actually limit the use, as some of the currently allowed manufacturing and industrial uses would not be allowed with the proposed C2-2-RIO zoning.

Goals, Principles, and Strategies	Conflicts Analysis
	mile to the north) and the Project's inclusion of 72 long-term and 40 short-term bicycle parking spaces, shower facilities, and a bike repair area. The Project would enhance safe pedestrian travel at the Project Site by providing public sidewalks adjacent to the Project Site on Colyton Street and South Hewitt Street where none currently exist, and by providing a pedestrian passageway through the proposed Office Building between Colyton Street and South Hewitt Street. In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be subject to the Site Plan Review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department (LAFD) to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
<b>Goal 3</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Not Applicable.</b> This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system and thus does not apply to individual development projects.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	No Conflict. The Project would retain the existing building formerly occupied by the A+D Museum and would provide new office and restaurant uses in a walkable urban neighborhood within a TPA, which would be located near (within one-half mile of) existing transit facilities, including multiple bus route stops and the Metro L Line (Gold Line) Little Tokyo/Arts District Station. The Project would also provide 72 long-term and 40 short-term bicycle parking spaces, shower facilities, and a bike repair area. The Project would also include a Transportation Demand Management (TDM) Program as Project Design Feature TRANS-PDF-3 to provide commuters with information regarding transportation options. Thus, the Project would contribute to increasing travel choices within the transportation system for employees and customers/guests of the proposed uses.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	No Conflict. The Project includes the infill development of a site located in a heavily urbanized area of the City. The Project would provide employment opportunities in close proximity to (within one-half mile of) existing residential units, other commercial land uses, and transit facilities, including bus route stops and the Metro Gold L Line (Gold Line) Little Tokyo/Arts District Station, which would reduce vehicle miles traveled (VMT) and greenhouse gas

Goals, Principles, and Strategies	Conflicts Analysis
	emissions (GHG). The Project would also be constructed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver Certification level for new buildings as described in Project Design Feature GHG-PDF-1.
Goal 6 Support healthy and equitable communities.	No Conflict. The Project would provide employment opportunities in a highly urbanized area in close proximity to residential and commercial development. The Project Site is located near (within one-half mile of) existing transit facilities, including bus route stops and the Metro Gold L Line (Gold Line) Little Tokyo/Arts District Station. The Project would provide public sidewalks adjacent to Project Site on Colyton Street and South Hewitt Street where none currently exist, and it would also provide a pedestrian passageway through the proposed Office Building between Colyton Street and South Hewitt Street to enhance pedestrian access in the area. The Project would also include 72 long-term and 40 short-term bicycle parking spaces, shower facilities, and a bike repair area. Given the urban nature of the Project Site area, the Project would support healthy and equitable communities by being accessible by walking, biking, and public transit; which are forms of active and affordable travel, from nearby residences, commercial uses, and/or transit stops.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	No Conflict. The Project includes development of an infill site in an urbanized area of the City that is near several sources of transit, as previously described. The Project would promote low emissions technologies by providing electric vehicle (EV)-ready parking spaces per code requirements. The Project would also include short- and long-term bicycle facilities, shower facilities, and a TDM program as Project Design Feature TRANS-PDF-3 to promote non-auto travel and reduce the use of single-occupant vehicle trips. In addition, the Project would fund the Transportation Management Organization (TMO) for the Downtown/Arts District as Project Design Feature TRANS-PDF-2, which oversees the development, implementation, and operation of TDM strategies within a particular study area, which are measures implemented to increase transit and mode choices. This type of transit-oriented commercial project helps to reduce dependence on automobile travel and to reduce mobile-sources of GHG emissions. In addition, the Project would comply with CalGreen requirements of the California Building Code (CBC), would meet or exceed Title 24 standards (achieving the equivalent of the USGBC LEED Silver Certification level for new buildings as described in Project Design Feature

Goals, Principles, and Strategies	Conflicts Analysis
	GHG-PDF-1), and would comply with the City Building Code, which are each designed to reduce the Project's water use and energy use and waste, as well as GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>Not Applicable.</b> This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system and thus does not apply to individual development projects.
<b>Goal 9</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Not Applicable. The Project does not propose residential units and would not displace existing residential units. However, the Project would increase employment opportunities in the Arts District and generate revenue, which would contribute to the economic prosperity of the community.
<b>Goal 10</b> Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Not Applicable.</b> The Project is an infill development in a highly urbanized area of the City that would not remove natural or agricultural lands, and it would not require the restoration of habitats.
Guiding Principles	
<b>Guiding Principle 1</b> Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system and thus does not apply to individual development projects.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system and thus does not apply to individual development projects.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	<b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies and thus does not apply to individual development projects.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system and thus does not apply to individual development projects.
<b>Guiding Principle 5</b> Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments and thus does not apply to individual development projects.

#### Goals, Principles, and Strategies **Conflicts Analysis** Guiding Principle 6 Monitor progress on all Not Applicable. This principle is directed toward aspects of the Plan, including the timely SCAG, which has the responsibility of monitoring the implementation of projects, programs, progress of the 2020-2045 (Regional Transportation Sustainable Communities strategies. Plan and Strategy (RTP/SCS) and thus does not apply to individual development projects. Guiding Principle 7 Regionally, transportation Not Applicable. This principle is directed toward investments should reflect best-known science SCAG and other jurisdictions/agencies that have regarding climate change vulnerability, in order to control over transportation investments and thus does design for long term resilience. not apply to individual development projects.

#### **Strategies**

#### **Focus Growth Near Destinations & Mobility Options**

Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.

Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along centerfocused main streets.

Plan for growth near transit investments and support implementation of first/last strategies.

Promote the redevelopment of underperforming developments and other outmoded nonresidential uses.

Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity existina neighborhoods.

Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).

Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking).

No Conflict. The Project would retain the existing building that was formerly occupied by the A+D Museum and develop a new 18-story Office Building on a currently underutilized site. The Project's museum, office, and restaurant land uses would result in a net increase of 1,270 jobs on-site (as described in Section IV.J, Population and Housing). The Project Site is an infill property located in a highly urbanized area of the City and is within walking distance (onehalf mile) of existing bus stops and a transit station that would allow multimodal access by employees and customers/quests of the proposed uses. Several bus lines serve the Project Site, which is also located in a TPA and one-half mile from the Metro L (Gold) Line Little Tokyo/Arts District Station to the north of the Site on Alameda Street. In addition to being located near transit, the Project Site is located in proximity to other commercial development, as well as multi-family and live/work residential land uses, which serves to expand job opportunities near transit, that also provide job opportunities for residents in the vicinity, to reduce commute times and distances. The Project would also provide vehicle and short- and long-term bicycle parking, a bike repair area, shower facilities, and sidewalks along the property frontages along South Hewitt and Colyton Streets where none currently exist, which would enhance first/last mile options between the Project Site and transit facilities. The Project also improves walkability in the immediate vicinity of the Project Site by replacing fenced and gated surface parking lots with a mixed-use commercial building that encourages pedestrian activity by introducing ground floor restaurant options and a pedestrian passageway that would connect South Hewitt and Colyton Streets. The Project would redevelop an infill property with underperforming commercial uses with office and restaurant uses that are consistent with the development trend of the surrounding area, as well as increase amenities and connectivity, and include a

Goals, Principles, and Strategies	Conflicts Analysis
Coale, i imelpios, and chategies	TDM Program as a Project Design Feature TRANS-PDF-3) to reduce single-occupant car trips. Therefore, the Project would not conflict with this action/strategy.
Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	<b>Not Applicable.</b> The Project does not propose the development of housing nor displace existing housing. In addition, the strategies related to funding,
Identify funding opportunities for new workforce and affordable housing development.	incentives and regulatory barrios related to housing development are directed toward SCAG and local jurisdictions and thus does not apply to individual
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	development projects.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	No Conflict. The Project would promote low emissions technologies by providing EV-ready parking spaces per code requirements. The Project would also include short- and long-term bicycle facilities, shower facilities, and a TDM program as Project Design Feature TRANS-PDF-3 to promote non-auto travel and reduce the use of single-occupant vehicle trips. In addition, the Project would fund the TMO for the Downtown/Arts District as Project Design Feature TRANS-PDF-2, which oversees the development, implementation, and operation of TDM strategies within a particular study area, which are measures implemented to increase transit and mode choices. Therefore, the Project would not conflict with this action/strategy.
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi modal payments.	<b>Not Applicable.</b> These strategies are directed toward SCAG and local jurisdictions and thus do not apply to individual projects.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	
Support Implementation of Sustainability Polici	ies
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	Not Applicable. This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects. However, the Project would support the reduction of GHG emissions

by incorporating sustainable design features to conserve energy and water and reduce waste generation, as required by the City of Los Angeles Municipal Code (LAMC) and City of Los Angeles

Goals, Principles, and Strategies	Conflicts Analysis
	Green Building Code (LAGBC). The Project would also comply with California Green Building Standards Code (CalGreen) requirements of the CBC, would meet or exceed Title 24 standards (achieving the equivalent of the USGBC LEED Silver Certification level for new buildings as described in Project Design Feature GHG-PDF-1), and would comply with the City Building Code, which are each designed to reduce the Project's water use and energy use, reduce waste, and reduce GHG emissions.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	Not Applicable. This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects. However, the Project is located one-half mile from the Metro L (Gold) Line Little Tokyo/Arts District Station.
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	<b>Not Applicable.</b> This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	<b>Not Applicable.</b> This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	<b>Not Applicable.</b> This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects.
Continue to support long range planning efforts by local jurisdictions.	<b>Not Applicable.</b> This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	<b>Not Applicable.</b> This strategy is directed toward SCAG and local jurisdictions and thus does not apply to individual development projects.

## Goals, Principles, and Strategies

## **Conflicts Analysis**

### **Promote a Green Region**

Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.

Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.

Integrate local food production into the regional landscape.

Promote more resource efficient development focused on conservation, recycling and reclamation.

Preserve, enhance and restore regional wildlife connectivity.

Reduce consumption of resource areas, including agricultural land.

Identify ways to improve access to public park space.

**Not Applicable.** These strategies are directed toward SCAG and local jurisdictions and thus do not apply to individual development projects. However, the Project would not result in impacts to agricultural land, food production, or wildlife production, as it would develop commercial uses on an urban infill site.

In addition, the Project would support SCAG's strategy to promote more resource efficient developments by incorporating sustainable design features to conserve energy and water and reduce waste generation, as required by the LAMC and the LAGBC. The Project would also comply with CalGreen requirements of the CBC, would meet or exceed Title 24 standards (achieving the equivalent of the USGBC LEED Silver Certification level for new buildings as described in Project Design Feature GHG-PDF-1), and would comply with the City Building Code, which are each designed to reduce the Project's water use and energy use, reduce waste, and reduce GHG emissions.

Source: SCAG. 2020. 2020-2045 RTP/SCS. September 3.

# Table IV.H-2

## **Project Conflicts with Applicable Framework Element Objectives and Policies** Framework Element Objective/Policy **Conflict Analysis**

Land Use Chapter Policy 3.1.5: Allow amendments to the community plans and coastal plans to further refine General Plan Framework Element land use boundaries and categories to reflect local conditions, parcel characteristics, existing land uses, and public input. These changes shall be allowed provided (a) that the basic differentiation and relationships among land use districts are maintained, (b) there is no reduction in overall housing capacity, and (c) additional review is conducted in accordance with the California Environmental Quality Act should the impacts of the changes exceed the levels of significance defined and modify the conclusions of the Framework Element's Environmental Impact Report.

**No Conflict.** The Project's requested General Plan Amendment would change the current land use designation from Heavy Industrial, as identified in the Central City North Community Plan (Community Plan), to Regional Center Commercial, which would permit a variety of commercial and residential uses. The proposed mix of office and restaurant uses of the Project would reflect the existing and increasingly diverse land uses in the Arts District and would maintain and reinforce the basic differentiation and relationships among land use districts by not physically dividing established communities. Existing Project Site commercial land uses would be replaced with new commercial land uses. In addition, the Project would not result in a reduction in housing capacity, which would otherwise require the construction of replacement housing elsewhere. The Project is subject to environmental review in accordance with the California Environmental Quality Act (CEQA), as provided by this Draft Environmental Impact Report (EIR). Therefore, the Project would not conflict with this policy.

Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

No Conflict. The Project would retain the existing building that was formerly occupied by the A+D Museum and would develop a new 18-story Office Building (including office and restaurant uses) on a currently underutilized site that is primarily occupied by limited commercial and office space and surface parking lots, located in the Arts District. Metro and Los Angeles Department of Transportation (LADOT) bus lines travel along streets immediately adjacent to the Project Site and in the Project vicinity, and the Site is located approximately one-half mile from the Metro L (Gold) Line Little Tokyo/Arts District Station to the north on Alameda Street. The Project would provide opportunities for employees and visitors to use public transit and walk to other commercial businesses and entertainment uses within and near the Project Site. As such, the Project would support the reduction of vehicle trips, VMT, and air pollution. Therefore, the Project would not conflict with this objective.

Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

No Conflict. Pedestrian and bicycle access to the former A+D Museum to remain and proposed 18story Office Building would be provided via entrances along all three street frontages. Access would also be provided via bike lanes in the Project

Framework Element Objective/Policy	Conflict Analysis
1 famework Liement Objective/Foncy	vicinity and the proposed passageway within the Project Site that connects South Hewitt Street and Colyton Street. In addition, the Project would provide bicycle parking and shower facilities, as required by
	with this policy.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	No Conflict. The Project area is comprised of mixed land uses and is not primarily a residential neighborhood. The Project would increase the height and density of the uses on the Project Site, which is consistent with more recently constructed and planned infill developments in the Arts District that include increased height and density compared to the land uses they replaced. For example, the Barker Lofts project, located southeast of the Project Site at 5 <sup>th</sup> and South Hewitt Streets, is four stories in height; a multi-unit residential building located northwest of the Project Site at East 4 <sup>th</sup> and Seaton Streets is six stories in height; and an eight-level parking garage is currently under construction northeast of the Project Site at East 4 <sup>th</sup> Place and South Hewitt Street. The City has also approved one project located approximately 0.75 mile southeast of the Project Site at 2143 Violet Street that includes a 36-story residential tower and 8-story office building. In addition, the City is reviewing the proposed 6AM Project, which would be located south of the Project Site and would include seven structures that would range in height from 110 feet to 732 feet. With regard to character, the Project has been designed to enhance the character of the Arts District. Specifically, the base of the proposed building is industrial and utilitarian in its design. It includes features that make the building reminiscent of an industrial warehouse structure typical of the Arts District, such as bi-fold doors that lead into the Project's restaurant uses on the street level and monumental doors set at either end of the passageway that links South Hewitt and Colyton Streets. In addition, the above-ground parking levels would be screened on three sides from public view by small steel window frames that would be set into the openings with a limited percentage of translucent glass, or by board form concrete, accented by a mural, which would further incorporate the Arts District's character. The upper section of the building
	large, steel-framed windows, which visually separate the upper office levels from the restaurant and parking levels below, which are enclosed behind a combination of windows that are smaller in height and width than the windows enclosing the upper

Framework Element Objective/Policy	Conflict Analysis
i ramework Element Objective/Poncy	Conflict Analysis office levels, board form concrete, and black steel
	screens. While the Project would change the land
	use designation of the Project Site from Heavy
	Industrial to Regional Center Commercial, the Arts
	District is already transforming from a heavy
	industrial area to a hybrid light industrial area with a
	growing number of mixed-use residential and
	commercial uses. The Project's commercial and
	office land uses would not conflict with this in-
	progress transformation. Therefore, the Project
	would not conflict with this policy.
Objective 3.4: Encourage new multi-family	No Conflict. The Project Site is located in the Metro
residential, retail commercial, and office	area of the Framework Element Long-Range Land Use Diagram. While it is not located within the
development in the City's neighborhood districts,	specified neighborhood district, community center,
community, regional, and downtown centers as	regional center, or downtown center areas therein, it
well as along primary transit corridors/boulevards, while at the same time conserving existing	would locate office and commercial uses proximate
neighborhoods and related districts.	to Downtown Los Angeles and to the Metro L (Gold)
gsimodo dila foldiod diotriolo.	Line Little Tokyo/Arts District Station (which is
	located one-half mile to the north). The Project area
	is also served by bus transit along 1st Street, 3rd
	Street, 4 <sup>th</sup> Street, 6 <sup>th</sup> Street, 7 <sup>th</sup> Street, Olympic Boulevard, Central Avenue, Boyle Avenue, and Soto
	Street. The bus stops closest to the Project Site are
	located at East 4 <sup>th</sup> Place and South Hewitt Street,
	and Merrick Street and Traction Avenue, and are
	served by the LADOT's Downtown Area Short Hop
	A line, a local community shuttle bus. Additional bus
	stops in the Project area are located at 4 <sup>th</sup> Street and
	Alameda Street and 4 <sup>th</sup> Street and Merrick Street and are served by the Montebello Bus Line M40, as
	well as Metro Local Lines 18, 53, and 62, and Metro
	Rapid Line 720. In addition, the Project would not
	disrupt or divide existing neighborhoods and related
	districts. Therefore, the Project would not conflict
	with this objective.
<b>Policy 3.4.1:</b> Conserve existing stable residential	<b>No Conflict.</b> See analysis for Objective 3.4, above.
neighborhoods and lower- intensity commercial	
districts and encourage the majority of new	
commercial and mixed-use (integrated commercial	
and residential) development to be located (a) in a	
network of neighborhood districts, community,	
regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c)	
along the City's major boulevards, referred to as	
districts, centers, and mixed-use boulevards, in	
accordance with the Framework Long-Range Land	
Use Diagram.	
Objective 3.14: Provide land and supporting	No Conflict. This is an economic development
services for the retention of existing and attraction	policy that was not specifically adopted for the
of new industries.	purpose of avoiding or mitigating an environmental
	effect. The conversion of industrial land is an
	economic issue that is not within the scope of CEQA

#### **Conflict Analysis** Framework Element Objective/Policy review, unless the conversion results in adverse impacts on the physical environment. Therefore, the discussion included here is for informational purposes only. The Project Site is located within two of the subareas of the Central City North Community Plan (Community Plan) area. The two overlapping subareas are the Artists-in-Residence District and the South Industrial subarea. The Artists-in-Residence subarea notes the transition from predominantly old industrial warehouses to artists' lofts, studios, and other commercial uses. The second subarea, South Industrial, is descriptive of historic uses in the area, as it was dominated by large warehouses that were conveniently located near the truck and railroad yards. The surrounding uses consist of a mix of low intensity industrial warehouses, an array of commercial uses of varied intensities, and live/work and residential uses. Over the past two decades, the subareas of the Community Plan area, within which the Project Site is located, have been transforming from a predominantly industrial area to one that is "primarily made up of old warehouses now converted to artists' lofts and studios," as indicated in the Community Plan. In addition, with the advent of the City's Adaptive Reuse Ordinance, the converted buildings now operate as live/work and commercial uses; thus, there is a growing residential population and commercial-oriented uses within the Community Plan area. For example, surrounding land uses include The Row DTLA, Biscuit Company Lofts, Toy Factory Lofts, Los Angeles Cleantech Incubator Campus, La Kretz Innovation Campus, Resident LA, Arts District Park and Arts District Dog Park, and the Southern California Institute of Architecture. Although the Project does not propose new industrial land uses, it would not conflict with the existing land use patterns and uses in the immediate area, which, as detailed above, are developed with a variety of commercial, residential, and live/work projects on properties zoned for industrial and manufacturing uses. Development of the Project would be compatible with adjacent development, would not result in a fragmented pattern of development, and, therefore, the Project would not conflict with this objective. Policy 3.14.4: Limit the introduction of new No Conflict. This is an economic development commercial and other non-industrial uses in policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental existing commercial manufacturing zones to uses effect. The conversion of industrial land is an which support the primary industrial function of the

location in which they are located.

economic issue that is not within the scope of CEQA

**Conflict Analysis** 

### review, unless the conversion results in adverse impacts on the physical environment. Therefore, the discussion included here is for informational purposes only. While this policy calls for the limitation of nonindustrial uses in existing commercial manufacturing zones to uses that "support the primary industrial function" of the location in which they are located, as described above, the area immediately surrounding the Project Site is no longer comprised of uses that are primarily industrial. Rather, the Arts District is comprised of a mix of industrial and manufacturing. commercial, residential, and live/work uses. The Project Site is also not utilized currently for industrial related purposes; it currently supports the building that was formerly occupied by the A+D Museum, surface parking, and a law office building. Therefore, the Project's office and commercial uses would support, and be compatible with, the adjacent pattern of development, and the Project would not conflict with this policy. Policy 3.14.6: Consider the potential re-No Conflict. This is an economic development policy that was not specifically adopted for the

designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:

Framework Element Objective/Policy

- a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development;
- b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development;
- c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;
- d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses;
- e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas;

purpose of avoiding or mitigating an environmental effect. The conversion of industrial land is an economic issue that is not with the scope of CEQA review unless the conversion results in adverse impacts on the physical environment. Therefore, the discussion included here is for informational purposes only.

The Project Site does not currently contain any warehouse/industrial uses, rather, the existing land uses consist of museum space, a law office, and surface parking lots. Therefore, the Project would not convert existing industrial land to other uses. Moreover, the development of the Project would not result in a fragmented pattern of development, because it would not physically divide an established community. The area immediately surrounding the Project Site is comprised of a mix of industrial and manufacturing, commercial. residential. live/work uses (such as Barker Lofts, The Row DTLA, Biscuit Company Lofts, Toy Factory Lofts, Los Angeles Cleantech Incubator Campus, La Kretz Innovation Campus, Resident LA, Arts District Park and Arts District Dog Park, and the Southern California Institute of Architecture). Therefore, the Project's museum space, office, and restaurant uses would reinforce the current mixed-use development trend that is occurring in the Project vicinity.

## Framework Element Objective/Policy

- f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses;
- g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or
- Where existing industrial uses constitute a hazard to adjacent residential or natural areas.

#### **Conflict Analysis**

Although designated and zoned for industrial uses, the existing uses are not industrial, as detailed above, and the Project Site is unlikely to accommodate viable industrial development given its size, location, and other land uses in the immediate vicinity. The Project Site is relatively small in size for industrial development, at 1.31 acres, and it is bounded on three sides by the existing roadway network. Further, the Applicant does not own or control the remaining adjacent parcels. Therefore, it is not feasible to assemble adjacent parcels to create a larger, unified site that would support a viable industrial development.

According to the Community Plan, there are 914 acres planned for industrial use (approximately 45.5 percent of the 2,010-acre total) in the Community Plan area. The Project Site comprises 1.31 acres. or approximately 0.14 percent of the industrially-zoned land in the Community Plan area. Therefore, adequate land would remain for industrial uses and industrial job opportunities. It is also noted that while not industrial in nature, the Project would result in a net increase of 1,270 jobs on-site (as shown in Section IV.J, Population and Housing) and would generate substantial ongoing revenue to the City in the form of sales and property taxes. Therefore, the Project would provide jobs for the residents of the City and contribute to the City's overall economic prosperity. As such, the Project would not conflict with this policy.

**Policy 3.18:** Provide for the stability and enhancement of multi-family residential, mixeduse, and/or commercial areas of the City and direct growth to areas where sufficient infrastructure and services exist.

No Conflict. As discussed in Section IV.G, Hydrology and Water Quality; Section IV.K.1, Public Services - Fire Protection; Section IV.K.2, Public Services - Police Protection: Section IV.L. Transportation; Section IV.N.1, Utilities and Service Systems - Solid Waste; Section IV.N.2, Utilities and Service Systems - Wastewater; Section IV.N.3, Utilities and Service Systems - Water Supply; and Section IV.N.4, Utilities and Service Systems -Electric Power. Natural Gas. and Telecommunications Infrastructure of this Draft EIR, and in Appendix A2, Initial Study, of this Draft EIR, the Project Site would be located in an area with adequate public services and infrastructure available to serve the Project.

#### **Housing Chapter**

The goals, objectives, and policies of the Framework Element Housing Chapter do not apply to the Project, as it would neither remove existing housing nor provide new housing.

#### Framework Element Objective/Policy

#### **Conflict Analysis**

#### **Urban Form and Neighborhood Design Chapter**

**Objective 5.8:** Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

**Policy 5.8.1:** Buildings in pedestrian-oriented districts and centers should have the following general characteristics:

- An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk;
- b. A building wall more-or-less continuous along the street frontage;
- c. Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases;
- d. Shops with entrances directly accessible from the sidewalk and located at frequent intervals;
- e. Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate:
- f. Ground floor building walls devoted to display windows or display cases;
- g. Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible;
- Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and
- The area within 15 feet of the sidewalk may be an arcade that is substantially open to the sidewalk to accommodate outdoor dining or other activities.

No Conflict. The Project is not located in a designated neighborhood district, community center, or pedestrian-oriented subarea within a regional center. Nevertheless, the Project would retain the existing building formerly occupied by the A+D Museum building and develop an 18-story Office Building within the Arts District. The ground floor of the Office Building, which fronts East 4th Street and South Hewitt Street, would include office and restaurant spaces: some of which would be approximately 20 feet in height with bi-fold doors for increased street interaction. The building formerly occupied by the A+D Museum is anticipated to be re-occupied with a use that is consistent with historic uses, such as the A+D Museum, for which the building interior is customized. These land uses would be open to patrons, office employees, and visitors. Pedestrian activity would also be enhanced by an open courtyard along Colyton Street, and a passageway connecting South Hewitt and Colyton Streets through the ground floor of the Office Building. The existing 4th Street sidewalk would be maintained, and the Project would provide sidewalks along Colvton and South Hewitt Streets. With the exception of the pedestrian passageway through the Office Building and the minimal space between the Office Building and the existing building formerly occupied by the A+D Museum, the proposed Office Building and the building formerly occupied by the A+D Museum (which would be retained on-site) would create a nearly continuous wall along the street frontage. The exterior walls of the Office Building would be up to 18 stories in height along existing and new sidewalks along the Project frontage, which would define the street and create a sense of enclosure. The existing building formerly occupied by the A+D Museum and the proposed new ground floor office and restaurant uses within the Office Building would have entrances directly accessible from the sidewalks, and parking would be provided within the building's subterranean levels and levels 2 through 5, which would be screened from view by a combination of board form concrete; non-operable, industrial steel frame windows; and black metal screens. In addition, the Project would provide safe lighting for security and wayfinding purposes. Lastly, the Project would provide shortand long-term bicycle spaces, a bike repair area, and shower facilities, which would decrease reliance on vehicular transportation, reduce VMT, and reduce GHGs. Therefore, the Project would not conflict with this objective/policy.

#### Framework Element Objective/Policy

#### **Conflict Analysis**

#### **Open Space and Conservation Chapter**

**Objective 6.4:** Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.

Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.

**Policy 6.4.8:** Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.

- a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.
- b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.

No Conflict. The Project would develop office and restaurant uses and retain the existing building formerly occupied by the A+D Museum within the Arts District. Although there are no open space requirements for commercial uses, the Project would include several areas of publicly accessible open space and tenant amenity spaces. The Project would provide a landscaped and publicly accessible outdoor courtvard, with a pergola, and a passageway to provide pedestrian access between Colyton and South Hewitt Streets. The open space amenities for employees and visitors of the Office Building would also include balconies and terraces on the 6<sup>th</sup> floor and 17<sup>th</sup> rooftop level. The Project would also provide street trees along Colyton Street, East 4th Street, and South Hewitt Street at its frontage. Therefore, the Project would not conflict with these objective/policies.

#### **Economic Development Chapter**

**Objective 7.2:** Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

**No Conflict.** This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the discussion included here is for informational purposes only.

The Project would provide for commercial development and sustain economic growth by creating new restaurant and office uses, providing a net increase of 1,270 jobs, and generating sales, property, and business license tax revenue. The Project is subject to environmental review in accordance with CEQA, as provided by the Draft

Framework Element Objective/Policy	Conflict Analysis
	EIR, would meet or exceed applicable regulations and standards for efficiency, and would include project design features described within this Draft EIR that would reduce potential environmental impacts to assure maximum feasible environmental quality. Therefore, the Project would not conflict with this objective.
<b>Policy 7.2.8:</b> Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.	<b>No Conflict.</b> This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the discussion included here is for informational purposes only.
	The Project Site represents approximately 0.14 percent of the land currently designated for industrial uses in the Community Plan area. Therefore, adequate land would remain for industrial uses. Furthermore, the Project would result in a net increase of 1,270 employees on-site and would generate substantial ongoing revenues to the City in the form of sales, property, and business license taxes.
	Moreover, this policy must be considered in light of Policy 3.14.6. Based on the immediately surrounding uses (commercial, residential, and live/work) and the Project Site's relatively small parcel size of 1.31 acres for industrial use, this specific site is not suited to a modern, large-scale industrial operation. Further, the Applicant does not own or control the remaining adjacent parcels. Therefore, it is not feasible to assemble adjacent parcels to create a larger, unified site that would support a viable industrial development.
	Furthermore, the Project would substantially meet the criteria for changing the current land use designation. As described in more detail in the response to Policy 3.14.6, The Project Site does not currently contain any warehouse/industrial uses; therefore, the Project would not convert existing industrial land to other uses. Moreover, the development of the Project would not result in a fragmented pattern of development, because it would not physically divide an established community. The area immediately surrounding the Project Site is comprised of a mix of industrial and manufacturing, commercial, residential, and live/work uses (such as Barker Lofts, The Row DTLA, Biscuit Company Lofts, Toy Factory Lofts, Los Angeles Cleantech Incubator Campus, La Kretz Inpovention Company
	Innovation Campus, Resident LA, Arts District Park and Arts District Dog Park, and the Southern California Institute of Architecture). Therefore, the

Framework Element Objective/Policy	Conflict Analysis
	Project's museum space, office, and restaurant uses
	would reinforce the current mixed-use development trend that is occurring in the Project vicinity.
	The City has also approved one project located approximately 0.75 mile southeast of the Project Site at 2143 Violet Street that includes a 36-story residential tower and 8-story office building. In addition, the City is reviewing the proposed 6AM Project, which would be located south of the Project Site and would include seven structures that would range in height from 110 feet to 732 feet, providing a mix of residential, hotel, school, and art spaces.
	Therefore, the Project would not conflict with this policy.
Policy 7.2.9: Limit the re-designation of existing industrial land to other land uses except in cases where such re- designation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use.	<b>No Conflict.</b> This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the discussion included here is for informational purposes only.
	As previously described in the responses to Policy 3.14.6 and Policy 7.2.8 above, the Project Site would substantially meet the criteria for changing the Project Site's current industrial land use designation. Therefore, the Project would not conflict with this policy.
<b>Policy 7.2.11:</b> Ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a specific location in Los Angeles.	Not Applicable. This policy is directed towards the City and thus does not apply to individual projects. However, the Project would not prevent the City from accommodating existing, new, and relocating industrial firms.
Infrastructure and Public Services Chapter	
Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.	No Conflict. As detailed in Section IV.N.2, Utilities and Service Systems – Wastewater, infrastructure in the vicinity of the Project Site includes an eight-inch sewer discharge line in South Hewitt Street and East 4 <sup>th</sup> Place, which feeds into the primary 22-inch sewer line in Alameda Street that ultimately discharges into a 40-inch sewer line on 8 <sup>th</sup> Street. There are also secondary sewer lines on the adjacent streets of Colyton Street and East 4 <sup>th</sup> Street, as well as nearby 10-inch sewer discharge lines in Palmetto Street.
	Project wastewater would ultimately be conveyed to, and treated by, the Hyperion Water Reclamation Plant (WRP). Currently, the Hyperion WRP has a remaining daily capacity of 175 million gallons per day. As the Project is expected to generate a net increase of 56,246 gallons per day of wastewater, it would represent only 0.03 percent of the Hyperion WRP's available capacity. Therefore, the Hyperion WRP has sufficient capacity to accommodate the

Framework Element Objective/Policy	Conflict Analysis
	Project, and the Project would not conflict with this goal.
Policy 9:3:1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. Wastewater generated by the Project's new uses would be typical of office and restaurant land uses and would not include industrial discharges comprised of hazardous substances. The building formerly occupied by the A+D Museum is anticipated to be re-occupied with a use that is consistent with recent uses, such as the A+D Museum, for which the building interior is customized, therefore, wastewater generated by this use would be consistent with previous operations. In addition, as discussed in Section IV.N.3, Utilities and Service Systems – Water Supply and Infrastructure, the Project would include water conservation features as Project Design Feature WS-PDF-1, which would also reduce wastewater flows. Therefore, the Project would not conflict with this policy.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	No Conflict. As analyzed in Section IV.N.3, Utilities and Service Systems — Water Supply and Infrastructure, based on the Water Supply Assessment prepared by the City of Los Angeles Department of Water and Power (LADWP), the LADWP would be able to meet the Project's water needs, as well as the existing and planned needs of its service area.
	In addition, a six-inch water main is located in East 4 <sup>th</sup> Street, an eight-inch water main is located in Colyton Street, and another eight-inch water main is located in South Hewitt Street. There are also two existing fire hydrants on East 4 <sup>th</sup> Street at the

#### Framework Element Objective/Policy **Conflict Analysis** corners of Colyton Street and South Hewitt Street, in addition to an existing fire hydrant located mid-block of Colyton Street between East 4th Street and 5th Street. A total of three existing hydrants are located within 300 feet of the Project Site. Therefore, adequate water infrastructure exists in the Project vicinity to serve the Project Site. The Project would require new connections from existing facilities and would not be required to construct new distribution lines where none currently exist. However, based on a preliminary evaluation of local water delivery infrastructure near the Project Site, a water line upgrade to existing facilities may be required specifically to provide adequate water pressures for five public hydrants flowing simultaneously around the perimeter of the Project Site. Such water lines would be installed per Division 7, Sections 57.507.1 and 57.09.06 of the Fire Code. In addition, the Project Applicant would be required to submit the proposed plot plans for the Project to the LAFD and LADWP for review for compliance with applicable Fire Code, California Fire Code, and City Building Code requirements. Such review is a legal prerequisite, with which the Project would be required to comply. Therefore, the Project would not conflict with this objective. Goal 9P: Appropriate lighting required to (1) No Conflict. The Project would provide outdoor lighting for security and wayfinding purposes. provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, Project lighting in the pedestrian walkways would be transportation, recreation, security, ornamental, wall mounted or ground mounted, directed and other outdoor locations; (2) provide downward, and shielded away from adjacent land appropriate and desirable regulation uses. Building security lighting would be used at architectural and informational lighting such as entries and exits. In addition, the above-ground building facade lighting or advertising lighting; and parking levels would be enclosed and screened from (3) protect and preserve the nighttime public view, so no spillover from parking lighting environment, views, driver visibility, and otherwise would occur. Therefore, the Project would not minimize or prevent light pollution, light trespass, conflict with this goal. and glare. No Conflict. The Project would comply with Objective 9.40: Ensure efficient and effective energy management in providing appropriate CalGreen requirements of the CBC, would meet or levels of lighting for private outdoor lighting for exceed Title 24 standards (achieving the equivalent private streets, parking areas, pedestrian areas, of the USGBC LEED Silver Certification level for new security lighting, and other forms of outdoor lighting buildings as described in Project Design Feature and minimize or eliminate the adverse impact of GHG-PDF-1), and would comply with the City lighting due to light pollution, light trespass, and Building Code, which are each designed to reduce the Project's energy use. Therefore, the Project glare. would not conflict with this objective. Refer also to the conflict analysis of Goal 9P for a description of

Source: City of Los Angeles Department of City Planning. 2001. Citywide General Plan Framework Element. Originally adopted by City Council on December 11, 1996 and re-adopted on August 8.

Project Site lighting.

## <u>Table IV.H-3</u> Project Conflicts with Mobility Plan 2035 Policies

Mobility Plan Policy	Conflict Analysis
Policy 1.6: Design detour facilities to provide safe	No Conflict. As provided by Project Design Feature
passage for all modes of travel during times of construction.	TRANS-PDF-1, and discussed in Section IV.L, Transportation, a Construction Traffic Management Plan would be prepared in accordance with LADOT requirements and would include features to address any temporary vehicle, sidewalk, or bicycle lane closures, as well as to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). The Project would also provide temporary traffic controls to direct traffic around any closures. Therefore, the Project would not conflict with this policy.
Policy 2.3: Recognize walking as a component of every trip, and ensure high- quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	No Conflict. The existing building formerly occupied by the A+D Museum building and the ground floors of the proposed Office Building, which front East 4 <sup>th</sup> Street, Colyton Street, and South Hewitt Street, would include museum, office, and restaurant spaces; some of which would be approximately 20 feet in height with bi-fold doors for increased street interaction. These land uses would be open to patrons, office employees, and visitors. Pedestrian activity would also be enhanced by an open courtyard along Colyton Street, and a passageway connecting South Hewitt and Colyton Streets through the ground floor. The existing East 4 <sup>th</sup> Street sidewalk would be maintained, and the Project would provide sidewalks along Colyton and South Hewitt Streets. In addition, the Project would provide lighting (to provide safe lighting for security and wayfinding purposes), and video surveillance, for safety. Therefore, the Project would not conflict with this policy.
<b>Policy 2.6:</b> Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	No Conflict. The Project proposes short- and long-term bicycle facilities and shower facilities to support bicyclists. Therefore, the Project would not conflict with this policy.
<b>Policy 2.10:</b> Facilitate the provision of adequate on and off-street loading areas.	No Conflict. The Project would include a loading area, for deliveries and trash pick-up, on South Hewitt Street, at the southeast corner of the proposed Office Building. Therefore, the Project would not conflict with this policy.
<b>Policy 3.1:</b> Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.	No Conflict. The Project Site is located in a TPA, one-half mile from the Metro L (Gold) Line Little Tokyo/Arts District Station, and it is also served by multiple bus lines, to encourage the use of public transit. Pedestrian activity would be enhanced by the Project by an open courtyard along Colyton Street, and a passageway connecting South Hewitt and

Mobility Plan Policy	Conflict Analysis
iwiobility Flail Folicy	Colyton Streets through the ground floor. In addition,
	the Project would provide sidewalks along its
	Colyton and South Hewitt Street frontages and
	proposes short- and long-term bicycle facilities, a
	bike repair area, and shower facilities to support
	bicyclists. The Project also provides above- and
	below-ground parking per LAMC requirements.
	Therefore, the Project would not conflict with this
	policy.
Policy 3.3: Promote equitable land use decisions	No Conflict. The Project's land uses would result in
that result in fewer vehicle trips by providing	a net increase of 1,270 jobs on-site (as shown in
greater proximity and access to jobs, destinations,	Section IV.J, Population and Housing). The Project
and other neighborhood services.	would develop a commercial building within walking
and the grade sections of	distance of existing bus stops and a transit station
	(one-half mile from the Metro L [Gold] Line Little
	Tokyo/Arts District Station to the north of the Site on
	Alameda Street) and in proximity to other
	commercial development, as well as multi-family
	and live/work residential land uses. It would also
	provide vehicle and short- and long-term bicycle
	parking, and shower facilities, which would
	maximize the potential for mobility and accessibility
	for people. The Project also improves walkability in
	the immediate vicinity of the Project Site by replacing
	fenced and gated surface parking lots with a mixed-
	use commercial building that encourages pedestrian
	activity by introducing ground floor restaurant
	options and a pedestrian passageway that would
	connect South Hewitt and Colyton Streets. The
	existing East 4 <sup>th</sup> Street sidewalk would be
	maintained, and the Project would provide sidewalks
	along Colyton and South Hewitt Streets. These Project features would also reduce VMT. Therefore,
	the Project would not conflict with this policy.
Policy 3.4: Provide all residents, workers and	No Conflict. The Project Site is located in a TPA,
visitors with affordable, efficient, convenient, and	
attractive transit services.	one-half mile from the Metro L (Gold) Line Little
attractive transit services.	Tokyo/Arts District Station. The Project area is also
	served by multiple bus lines. Therefore, employees
	and patrons of the proposed land uses would have
	access to these transit services, and the Project
Delieu 20. Dravida biqualista with assuration	would not conflict with this policy.
<b>Policy 3.8:</b> Provide bicyclists with convenient, secure and well-maintained bicycle parking	No Conflict. The Project proposes short- and long-
secure and well-maintained bicycle parking facilities.	term bicycle facilities and shower facilities to support
raciilles.	bicyclists. Therefore, the Project would not conflict
Dellar A.O. Francisco de Cr. C.	with this policy.
Policy 4.8: Encourage greater utilization of	, ,
Transportation Demand Management (TDM)	to promote non-auto travel and reduce the use of
strategies to reduce dependence on single-	single-occupant vehicle trips. Therefore, the Project
occupancy vehicles.	would not conflict with this policy.

Mobility Plan Policy	Conflict Analysis
<b>Policy 4.9:</b> Partner with the private sector to foster the success of Transportation Management Organizations (TMOs) in the City's commercial districts.	<b>No Conflict.</b> The Project includes funding the TMO for the Downtown/Arts District, which oversees the development, implementation, and operation of TDM strategies within a particular study area, which are measures implemented to increase transit and mode choices. Therefore, the Project would not conflict with this policy.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. The Project would reduce VMT through its TDM and TMO programs. In addition, several bus lines serve the Project Site, which is also located in a TPA and one-half mile from the Metro L (Gold) Line Little Tokyo/Arts District Station to the north of the Project Site on Alameda Street. Therefore, the Project would not conflict with this policy.
<b>Policy 5.4:</b> Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	<b>No Conflict.</b> The Project would provide EV-ready parking spaces per code requirements to facilitate future installation of EV chargers. Therefore, the Project would not conflict with this policy.
<b>Policy 5.5:</b> Maximize opportunities to capture and infiltrate stormwater within the City's public right-ofways.	<b>Not Applicable.</b> This policy pertains to stormwater management within the City's rights-of-way. The Project Site is private property and thus this policy would not be applicable to the Project.

Source: City of Los Angeles, Department City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Approved by the City Planning Commission on June 23 and adopted by City Council on September 7.

<u>Table IV.H-4</u>
Project Conflicts with Applicable Central City North Community Plan Policies

Community Plan Policy	Conflict Analysis
Commercial	
2-2.2 and 2-3.1 New development needs to add to and enhance the existing pedestrian street activity.	<b>No Conflict.</b> The Project would include ground floor commercial space, such as restaurant space, which would be open to commercial building patrons, office employees, and visitors. Pedestrian activity would also be enhanced by an open courtyard on Colyton Street and a pedestrian passageway connecting South Hewitt and Colyton Streets through the ground floor. The existing East 4 <sup>th</sup> Street sidewalk would be maintained, and the Project would provide sidewalks along Colyton and South Hewitt Streets. Therefore, the Project would not conflict with this policy.
2-2.3 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.	<b>No Conflict.</b> The Project would retain the existing building formerly occupied by the A+D Museum and develop an Office Building within the Arts District. The ground floors of the existing and proposed buildings, which front East 4 <sup>th</sup> Street, Colyton Street, and South Hewitt Street, would include office and restaurant spaces; some of which would be approximately 20 feet in height with bi-fold doors for increased street interaction. Therefore, the Project would not conflict with this policy.
<b>2-4.1</b> Require that any proposed development be designed to enhance and be compatible with adjacent development.	No Conflict. The existing land uses within the general Project vicinity are characterized by a mix of low- to medium-intensity industrial, commercial, and mixed-use buildings, which vary widely in building style and period of construction. Surrounding properties include industrial space, office use, an innovation campus, commercial retail, restaurant, multi-family residential buildings and live/work units, parks, and surface parking lots.
	Over the past two decades, the subareas of the Central City North Community Plan area, within which the Property is located, have been transforming from a predominantly industrial area to one that also includes multi-family housing and live/work units, as indicated in the Community Plan. In addition, with the advent of the City's Adaptive Reuse Ordinance, many converted buildings now operate as live/work and creative commercial uses; thus, there is a growing residential population and commercial-oriented uses within the Arts District.
	Therefore, the Project's commercial nature would be consistent with the transitioning uses within the area. The Project would include office and restaurant uses on the ground floor, and office uses in the upper floors. The building formerly occupied by the A+D

Community Plan Policy	Conflict Analysis
	Museum is anticipated to be re-occupied with a use that is consistent with recent uses, such as the A+D Museum, for which the building interior is customized. The proposed commercial and restaurant uses, and open courtyard and passageway would activate the ground floor, contribute to neighborhood activity, and create new connections between uses and streets. Therefore, the Project would not conflict with this policy.
2-4.2 Preserve community character, scale, and architectural diversity.	No Conflict. The Project's commercial nature would be consistent the transitioning uses within the Arts District, which is increasing in scale at nearby uses, as previously described. Community character and architectural diversity would be preserved by retaining the former A+D Museum building and redeveloping the remainder of the Project Site with a new Office Building that includes industrial and modern architectural elements. Specifically, the base of the proposed building is industrial and utilitarian in its design. It includes features that make the building reminiscent of an industrial warehouse structure typical of the Arts District, such as bi-fold doors that lead into the Project's restaurant uses on the street level and large doors set at either end of the passageway that links South Hewitt and Colyton Streets. The upper section of the building would include a more modern design, including large, steel-framed windows, which visually separate the upper office levels from the restaurant and parking levels below. The podium level is enclosed behind a combination of windows that are smaller in height and width than the windows enclosing the upper office levels, board form concrete, and black steel screens. In addition, the façade of some surfaces of the proposed building would be painted with large graphics or murals, to further incorporate the Arts District's character. Therefore, the Project would not conflict with this policy.
2-4.3 Improve safety and aesthetics of parking areas in commercial areas.	No Conflict. The Project would improve safety and aesthetics of parking areas by replacing fenced and gated surface parking lots with subterranean and above-ground parking levels. Vehicular access would be limited to East 4 <sup>th</sup> Street, with loading and deliveries limited to South Hewitt Street, thereby reducing potential vehicular-pedestrian conflict. The aboveground parking levels would be screened from public view by industrial steel frame windows and board form concrete. Therefore, the Project would not conflict with this policy.

Community Plan Policy	Conflict Analysis
Industrial	•
<b>3-1.1</b> Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.	<b>No Conflict.</b> This policy relates to economic development and was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the discussion here is for informational purposes only.
	According to the Community Plan, there are 914 acres of industrial use (approximately 45.5 percent of the 2,010-acre total) in the Community Plan area. The Project Site comprises 1.31 acres or approximately 0.14 percent of the industrially-zoned land in the Community Plan area. Therefore, adequate land would remain for emerging industrial sectors.
	The Project would not replace existing industrial land uses with non-industrial land uses, since the Project Site is currently developed with commercial and office space and surface parking lots. Furthermore, based on the immediately surrounding uses (commercial, residential, and live/work) and the Project Site's smaller parcel size of 1.31 acres, this specific site is not suited to a modern, large-scale industrial operation. The Project's office and commercial uses would be compatible with the existing mix of industrial and manufacturing, commercial, residential, and live/work land uses that surrounding the Project Site.
	The Project would also create additional employment opportunities through the development of commercial and office land uses. The Project would provide additional employment opportunities in the area, and it would also generate ongoing revenues to the City in the form of sales, business license, and property taxes. Therefore, the Project would not conflict with this policy.
<b>3-1.2</b> Adequate compatibility should be achieved through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial	<b>No Conflict.</b> The Project would not locate an industrial use adjacent to residential and commercial uses. Rather, the Project would develop commercial and office uses on the Project Site.
uses.	Nevertheless, as discussed in Section IV.F, Hazards and Hazardous Materials, the Project would comply with applicable federal, State, and local health and safety requirements.
	In addition, Project compatibility with the community character and architectural diversity would be preserved by retaining the former A+D Museum building and redeveloping the remainder of the Project Site with an Office Building that includes industrial and modern architectural elements. Specifically, the base of the proposed building is

Community Plan Policy	Conflict Analysis
	industrial and utilitarian in its design, making the building reminiscent of an industrial warehouse structure typical of the Arts District. The upper section of the building would include a more modern design, including large, steel-framed windows, which visually separate the upper office levels from the restaurant and parking levels below. The podium level is enclosed behind a combination of windows that are smaller in height and width than the windows enclosing the upper office levels, board form concrete, and black steel screens. In addition, the façade of some surfaces of the proposed building would be painted with large graphics or murals, to further incorporate the Arts District's character. Therefore, the Project would not conflict with this policy.
<b>3-2.1</b> Support the existing artists-in-residence in Central City North as a cultural resource for the community.	No Conflict. This policy relates to economic development and was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the discussion here is for informational purposes only.  The Project Site is currently developed with a building formerly occupied by the A+D Museum, a law office, and surface parking lots. As such, under existing conditions, the Project Site does not represent
	existing artist-in-residence uses. The Project would not eliminate existing artist-in-residence cultural resources in the community. Therefore, the Project would not conflict with this policy.
3-3.1 The numerous large rail yards and other industrially planned parcels located in predominately industrial areas should be protected from development by other uses which do not support the industrial base of the City and the community.	No Conflict. The Project Site consists of approximately 1.31 acres located on land designated as Heavy Industrial, and the Project would change this designation to Regional Center Commercial. The Project Site is currently occupied by the former A+D Museum building, storage/garage buildings, a onestory office building, and surface parking. As shown on Figure II-2, Existing Site and Surrounding Land Uses, of the EIR Project Description, while some manufacturing and industrial uses are located on parcels immediately surrounding the Project Site, this area is comprised of a broader range of uses, including residences, offices, restaurants, bars and clubs, a cooking school, and parks. Based on this mix of land uses and the Project Site's smaller parcel size of 1.31 acres, this specific site is not suited for a modern, large-scale industrial operation. As the area immediately surrounding the Project Site is not a predominately industrial area, the Project's proposed commercial and office uses would be consistent with the current land use characteristics of the immediate area. Further, much of the industrially planned

Community Plan Policy	Conflict Analysis
Community Plan Policy	Conflict Analysis parcels in the area have been or are in the entitlement
	process to be reused or redeveloped for mixed-use purposes and or lighter industrial uses than the heavy industrial uses that have historically dominated the area. The Project would be consistent with the current shifts from heavy industrial to more mixed-use, creative studio, and office-oriented uses in the area.
	Therefore, the Project would not conflict with this policy.
Public and Institutional Land Use (Police Protec	tion)
<b>8-1.1</b> Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.	No Conflict. The Project would include safety design features (night lighting and video surveillance, for example) and construction traffic control features that would be incorporated into construction and operation of the Project to address law enforcement and emergency personnel needs. Therefore, the Project would not conflict with this policy.
<b>8-2.1</b> Support and encourage community based crime prevention efforts (such as Neighborhood Watch and the Senior Lead Officer Program), through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, assistance in the formation of new neighborhood watch groups, and regular communication with neighborhood and civic organizations.	<b>No Conflict.</b> The Project would provide security features, including security personnel, lighting, and video surveillance. In addition, the Project Site is located in an area not only served by the LAPD but also by the Arts District Los Angeles Safety Team, which patrols the neighborhood 24 hours per day and seven days per week by foot, bike, Segway, and vehicle. Therefore, the Project would not conflict with this policy.
<b>8-2.2</b> Ensure that landscaping around buildings be placed so as not to impede visibility.	No Conflict. The Project design includes a landscaped courtyard and a passageway, which would enhance the streetscape but would not interfere with visibility. Therefore, the Project would not conflict with this policy.
<b>8-2.3</b> Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.	<b>No Conflict.</b> The Project would provide adequate lighting to provide safe lighting for security and wayfinding purposes, as described in Project Design Feature POL-PDF-1. Therefore, the Project would not conflict with this policy.
Public and Institutional Land Use (Fire Protection)	
9-1.1 Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	No Conflict. As discussed in Section IV.K.1, Public Services – Fire Protection, environmental review has involved coordination with the LAFD to determine the Project impact on service demands. 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. Therefore, the Project would not conflict with this policy.

Community Plan Policy	Conflict Analysis
Transportation	
12-1.1 Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.)	No Conflict. As a non-residential development, the mixed-use commercial building would provide employee incentives for alternatives to the automobile, through its proposed TDM and TMO program, which may include:  • Educational Programs/On-Site TDM Coordinator.  • Transportation Information Center/Kiosks.  • Bicycle and Pedestrian Amenities.  • City Bicycle Plan Trust Fund .  • Ridesharing Services Programs.  • Incentives for Using Alternative Travel Modes.  • Mobility Hub Support.  Therefore, the Project would not conflict with this policy.
12-1.3 Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	No Conflict. As discussed in Section IV.L, Transportation, the Project would implement Project Design Feature TRANS-PDF-3, which requires a TDM program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The Project also includes Project Design Feature TRANS-PDF-2, which includes funding the TMO for the Downtown/Arts District. The TMO oversees the development, implementation, and operation of TDM strategies within a particular study area, which are measures implemented to increase transit and mode choices. Therefore, the Project would not conflict with this policy.
<b>12-1.4</b> TDM measures in Central City North should be consistent with adopted City policy.	<b>No Conflict.</b> Refer to the analysis for Policy 12-1.3. The Project would not conflict with this policy.
Non-Motorized Transportation	The Froject would not commet with this policy.
13-1.4 Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.	<b>No Conflict.</b> The Project includes a total of 112 bicycle parking spaces on-site, comprised of 40 short-term and 72 long-term (storage) bicycle parking spaces, as well as showers. Therefore, the Project would not conflict with this policy.
18-1.1 Support the existing artists community in Central City North as a cultural resource for the community.	No Conflict. This policy relates to economic development and was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the discussion here is for informational purposes only.  The Project would not eliminate existing artist-inresidence cultural resources in the community, nor would it remove any artist-in-residence residential units, because the Project Site is currently developed with a building formerly occupied by the A+D Museum, a law office, and surface parking lots.

## Community Plan Policy **Conflict Analysis** The Project has been designed to enhance the character of the Arts District. Specifically, the base of the proposed building is industrial and utilitarian in its design. It includes features that make the building reminiscent of an industrial warehouse structure typical of the Arts District, such as bi-fold doors that lead into the Project's restaurant uses on the street level and oversized doors set at either end of the passageway that links South Hewitt and Colyton Streets. In addition, the above-ground parking levels would be screened on three sides from public view by small steel window frames that would be set into the openings with a limited percentage of translucent glass, or by board form concrete, accented by a mural, which would further incorporate the Arts District's character. In addition, the Project would include restaurant uses, providing commercial resources for residents in the Project area and employees and visitors of the Project to utilize. The Project would also include sidewalks along the Project Site's Colyton Street and South Hewitt Street frontages where none currently exist, as well as a landscaped courtyard along Colyton Street with seating and a pergola, and a passageway connecting Colyton Street and South Hewitt Street, which improve pedestrian walkability and safety for residents in the Project area and employees and visitors of the Project, as well as providing an open space amenity for the community. Furthermore, the Project would provide commercial development and sustain economic growth by creating new restaurant and office uses, providing a net increase of 1,270 jobs, and generating sales, property, and business license tax revenue on an ongoing basis to the City, which would also contribute to the economic prosperity of the Arts District and support the artists community. Therefore, the Project would not conflict with the existing artists community or this policy.

## **Design Policies for Individual Projects**

#### 1. SITE PLANNING

Structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/ vehicular conflicts by:

 Locating surface parking to the rear of structures; **No Conflict.** The ground floor commercial uses of the Project would face Colyton Street and South Hewitt Street, and the ground floor office space would face East 4<sup>th</sup> Street. Parking would be provided below ground and on the 2<sup>nd</sup> through 5<sup>th</sup> floors of the Office Building, with vehicular access to these levels would be provided via driveways on East 4<sup>th</sup> Street. The main pedestrian points of entry to the ground floor would be from Colyton Street and South Hewitt

#### Community Plan Policy

- b. Minimizing the number of widths of driveways providing sole access to the rear of commercial lots;
- Maximizing retail and commercial service uses along frontages of commercial developments;
- d. Providing front pedestrian entrances for businesses fronting on main commercial streets:
- e. Providing through arcades from the front of buildings to rear parking for projects within wide frontages;
- f. Providing landscaping strips between driveways and walkways accessing the rear properties;
- g. Providing speed bumps for driveways paralleling walkways of more than 50 feet;
- Requiring site plans which include ancillary structures, service areas, pedestrian walkways, vehicular paths, loading areas, drop off and landscaped areas;
- Providing where feasible, the under grounding of new utility service.

#### **Conflict Analysis**

Street, via the pedestrian passageway, which would provide access to the ground floor commercial and office uses as well as to the office building lobby. The Project would also provide landscaping along the Colyton Street courtyard, add landscaping on Colyton Street at the former A+D Museum building frontage, and add street trees along Colyton Street, East 4th Street, and South Hewitt Street. The Project would also provide sidewalks at its Colyton Street and South Hewitt Street frontages where none currently exist, and it would underground existing overhead utilities around the immediate perimeter of the Project Site. Utility service connections to the Office Building would also be located underground. Loading docks and trash and recycling areas would be provided on the ground floor along South Hewitt Street. The Project provides site plans consistent with portion (h) of this policy, which are conveyed in Chapter II, Project Description. Therefore, the Project would not conflict with this policy.

#### 2. HEIGHT AND BUILDING DESIGN

The mass, proportion, and scale of all new buildings and remodels shall be at a pedestrian scale. The design of all proposed projects shall be articulated to provide variation and visual interest, and enhance the streetscape by providing continuity and avoiding opportunities for graffiti. Building materials shall be employed to provide relief to bland untreated portions of exterior buildings façades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood, and creates a stable environment with a pleasant and desirable character. Accordingly, the following policies are proposed:

- Requiring the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building façades;
- 2. Providing accenting, complimentary building materials to building façades;

No Conflict. The Office Building would feature balconies, recesses, and articulation to provide variation and visual interest. The Project would increase the density and height currently on-site, and the ground floor commercial uses would be accessible from the street and from a landscaped pedestrian courtyard on Colyton Street and a passageway that connects Colyton and South Hewitt Streets. Visual interest at the ground floor would also be created with additional trees and sidewalk improvements along Colyton Street, East 4th Street, and South Hewitt Street, as well as by the combination of board form concrete, industrial steel frame windows, large bi-fold doors, metal screens, curtain walls, and shadowboxes that would be utilized in the Office Building design. The design also allows for murals along Colyton Street. This variety of architectural elements would ensure that the Project avoids large sterile expanses of building walls, and the combination of industrial and modern elements would be reminiscent of an industrial warehouse structure typical of the Arts District. Trash, recycling, and mechanical equipment would be screened from public view. Trash and recycling area would be

	Community Plan Policy	Conflict Analysis
3.	Maximizing the applications of architectural features or articulations to building façades;	enclosed within the Office Building along South Hewitt Street and accessible to collection vehicles from the loading dock. Similarly, mechanical
4.	Designating architecturally untreated façades for signage;	equipment would be located within the Office Building, as well as on the rooftop level, surrounded
5.	Screening of mechanical and electrical equipment from public view;	by black metal screens. Therefore, the Project would not conflict with this policy.
6.	Requiring the enclosure of trash areas for all projects;	not commet with the policy.
7.	Requiring freestanding walls to use articulation, recesses, surface perforations, porticoes to break up long freestanding walls.	

Source: City of Los Angeles, Department of City Planning. 2000. Central City North Community Plan. Adopted December 15.

# <u>Table IV.H-5</u> Project Conflicts with Applicable Policies of the Plan for a Healthy Los Angeles

## Healthy LA Policies

#### **Conflict Analysis**

#### Chapter 2 - A City Built for Health

Policy 2.2 Healthy Building Design and Construction: 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.

No Conflict. The Project would promote a healthy built environment by providing an enhanced pedestrian-oriented design as well as bicycle accessibility. For example, the ground floor features restaurant spaces and a pedestrian passageway that would connect Colyton Street and South Hewitt Street and facilitate pedestrian movement between the Project Site and adjacent uses along these streets. In addition, the Project Site is located in a TPA, and the Project features bicycle parking and showers to promote bicycle use, which serve to reduce VMT. Therefore, the Project would not conflict with this policy.

Policy 2.6 Repurpose Underutilized Spaces for Health: Work proactively with residents to identify and remove barriers to leverage and repurpose vacant and underutilized spaces as a strategy to improve community health.

No Conflict. Implementation of the Project would redevelop a low intensity urban infill site consisting of limited commercial spaces and associated surface parking lots with an 18-story Office Building including office and restaurant uses and increased amenities for residents and visitors that would enhance the built environment in the surrounding Project vicinity. The Project would generate employment opportunities (a net increase of 1,270 jobs) on a site located in a TPA, within one-half mile from the Metro L (Gold) Line Little Tokyo/Arts District Station and adjacent to streets with Metro and LADOT bus stops, which serve to reduce VMT, GHG, and other air pollutants. The Project's proximity to transit, sidewalk improvements along Colyton and South Hewitt Streets, courtyard along Colyton Street, pedestrian passageway connecting Colyton and South Hewitt Streets, short- and long-term bicycle parking spaces, bike repair area, and shower facilities would also promote walkability and provide bicycle accessibility, which would improve community health. Therefore, the Project would not conflict with this policy.

#### Chapter 5 - An Environment Where Life Thrives

Policy 5.1 Air Pollution and Respiratory Health: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.

**No Conflict.** The Project would concentrate new development and jobs on an urban infill site within walking distance to several Metro and LADOT bus lines along East 4<sup>th</sup> Street and the Metro L (Gold) Line Little Tokyo/Arts District Station. In addition, the Project would include short-term and long-term bicycle parking spaces. With the location near transit and provision of bike parking, the Project meets the intent of this policy by supporting efforts to reduce vehicle use; thereby, reducing mobile source emissions. Therefore, the Project would not conflict with this policy.

Healthy LA Policies	Conflict Analysis
Policy 5.7 Land Use Planning for Public	No Conflict. In addition to abiding by smart growth
Health and GHG Emission Reduction:	principles by locating an infill employment center
Promote land use policies that reduce per	development in proximity to public transportation options,
capita GHG emissions, result in improved air	the Project includes a range of sustainable building and
quality and decreased air pollution,	design features to conserve energy and water, reduce
especially for children, seniors and other	VMT, and reduce waste generation, as required by the
susceptible to respiratory diseases.	State and local regulations, which all serve to also reduce
	GHGs. Therefore, the Project would not conflict with this
	policy.

Source: City of Los Angeles, Department of City Planning. 2015. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan. March.