

IV. Environmental Impact Analysis

G. Land Use and Planning

1. Introduction

This section evaluates the Project's potential land use impacts based upon whether the Project would physically divide an established community or conflict with applicable local and regional plans, regulations and policies of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating environmental impacts.

Analyses of consistency with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR, including the following:

- The Project's consistency with the Southern California Association of Government's (SCAG's) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)* and smart growth principles that are embodied in SB 375, the *2016 Air Quality Management Plan*, and the *Air Quality Element of the General Plan* are analyzed in **Section IV.A, Air Quality**, of this Draft EIR;
- The Project's consistency with SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)*, and the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan) are analyzed in **Section IV.D, Greenhouse Gas Emissions**, of this Draft EIR;
- The Project's consistency with the *City of Los Angeles General Plan Safety Element* and the *Los Angeles Municipal Code* (LAMC) are analyzed in **Section IV.E, Hazards and Hazardous Materials**, of this Draft EIR;
- The Project's consistency with the *City of Los Angeles General Plan Noise Element* and Chapter XI of the LAMC, which includes the City's comprehensive noise ordinance, are analyzed in **Section IV.N, Noise**, of this Draft EIR;
- The Project's consistency with the *2016-2040 RTP/SCS*, SCAG's *Regional Housing Needs Assessment*, the *City of Angeles General Plan Framework Land Use, Housing and Economic Chapters*, the *City of Los Angeles General Plan Housing Element*, and the *Sustainable City pLAn* are analyzed in **Section IV.I, Population and Housing**, of this Draft EIR;

- The Project's consistency with the *City of Los Angeles Charter*, the *City of Angeles General Plan Framework Infrastructure and Public Services Chapter*, the *City of Los Angeles General Plan Safety Element and Open Space Element*, the LAMC, the *2018-2020 Strategic Plan*, the *Mutual Aid Operations Plan*, *Public Recreation Plan*, the *Los Angeles Public Library (LAPL) Branch Facilities Plan*, and the *LAPL Strategic Plan 2015-2020* are analyzed in **Section IV.J, Public Services**, of this Draft EIR; and
- The Project's consistency with the *2016-2040 RTP/SCS*, *Congestion Management Plan*, *City of Los Angeles Mobility Plan 2035*, and the LAMC are analyzed in **Section IV.K, Transportation**, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Senate Bill 375

In 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32) into law, which requires that California greenhouse gas (GHG) emissions be reduced to 1990 levels by 2020. Subsequently, the Legislature adopted Senate Bill 375 (SB 375) as one means of meeting the mandate of AB 32. Effective as of January 1, 2009, SB 375 directs local governments to modify their approach to regional planning and calls for the integration of transportation, land use, and housing in regional plans.

SB 375 requires the California Air Resources Board (CARB) to develop regional reduction targets for GHG emissions, and calls for the creation of regional plans to reduce those emissions from vehicle use (passenger vehicles and small trucks) throughout the State. With those targets in mind, each of California's 18 Metropolitan Planning Organizations, including SCAG, were required to develop a "Sustainable Community Strategy" (SCS). The Metropolitan Planning Organizations are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed GHG reduction targets by 2020 and 2035. The Metropolitan Planning Organizations must develop an Alternative Planning Strategy if the SCS cannot reach the regional target.

SB 375 has special provisions that apply to SCAG. It states that "a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy...for that

subregional area.”¹ In addition, SB 375 authorizes SCAG to “adopt a framework for a subregional SCS or a subregional Alternative Planning Strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships.” Finally, SB 375 requires SCAG to “develop overall guidelines, create public participation plans, ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.”

Among other design concepts addressed in SCAG’s RTP/SCS, these principles call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors. Sponsors of SB 375 have stated that because most people commute to work, and cars and light trucks generate approximately 30 percent of the GHG emissions in California, reducing the amount of GHGs emitted into the environment is partially dependent on balancing the number of jobs near residential development to shorten commute times. According to the principles of “smart growth,” solutions to ever-increasing commute times and distances include enabling more Californians to live near where they work and/or to increase public transportation ridership. The theory behind SB 375 is that if Californians spend less time and travel fewer miles in their vehicles, those vehicles would emit fewer GHGs. This can be done, in part, by locating growth in areas already devoted to urban uses that are readily accessible to transit.

On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. The 2020-2045 RTP/SCS is currently pending certification by the California Air Resources Board (CARB). Similar to the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses, builds upon and expands previous SCAG RTP/SCS plans’ land use and transportation strategies to improve mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a five percent decrease in daily miles driven per capita from 2016 to 2045.

(b) *CALGreen Building Code*

The California Green Building Standards Code (CALGreen), which was recently updated in January 2020, sets minimum standards that all new structures can meet to minimize significantly the State’s overall carbon output. Local jurisdictions retain the administrative authority to exceed the CALGreen standards. The CALGreen standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

¹ *Senate Bill 375*.

CALGreen requires that new buildings reduce water consumption, employ building commissioning, as outlined in Section 5.410.2, increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials.² CALGreen's mandatory measures establish a minimum for green construction practices and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs in a slow economy.

CALGreen has mandatory measures as well as more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 65 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.³

Key optional measures are included in a two-tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The non-residential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

(2) Regional

(a) *Regional Transportation Plan/Sustainable Communities Strategy*

As previously discussed, SCAG adopted the 2016-2040 RTP/SCS on April 7, 2016. The 2016-2040 RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. For the first time, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB, as required by SB 375. The 2016-2040 RTP/SCS provides an alternative to "business as usual" development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by state and federal agencies in April 2016, the 2016-2040 RTP/SCS includes approximately \$556.5 billion in projected funding for transportation projects for Los Angeles County.

The 2016-2040 RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region's needs through 2040.

² CALGreen, *Guide to the 2016 California Green Building Standards Code*, January 2017, page 55.

³ CALGreen, *2019 California Green Building Standards Code*, July 2019.

The 2016-2040 RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2016-2040 RTP/SCS is guided by and incorporates all projects from Metro's own Long-Range Transportation Plan.

The 2016-2040 RTP/SCS includes nine goals that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the state and region's transportation investments, and security of the regional transportation system. A consistency analysis of the goals and policies relevant to the Project is provided in **Table IV.G-1, Project Consistency with the Applicable Goals of the 2016-2040 RTP/SCS**, found in **Appendix H** of this Draft EIR. The regional transportation impacts of the Project are analyzed in greater detail in **Section IV.K, Transportation**, of this Draft EIR.

(3) Local

(a) *City of Los Angeles General Plan*

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven State-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element. The City's General Plan also includes the Air Quality Element, which is described in **Section IV.A, Air Quality**, of this Draft EIR. Other elements of the General Plan include the General Plan Framework, Health and Wellness Element (Plan for a Healthy Los Angeles), and the Central City North Community Plan, which is one of the 35 community plans of the Land Use Element.

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

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996, and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans.

The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers,

Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. The Framework Element identifies the Project Site as located within the Downtown Center, which is defined as follows: "An international center for finance and trade that serves the population of the five county metropolitan region. Downtown is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, regional transportation facilities and the Convention Center, The Downtown Center is generally characterized by a floor area ratio up to 13:1 and high rise buildings."

Land Use Chapter Goal 3G states "A Downtown Center as the primary economic, governmental, and social focal point of the region with an enhanced residential community."⁴ The Land Use Chapter further states that the Framework Element reflects the Strategic Plan's goals and maintains the Downtown Center as the primary economic, governmental, and social focal point of Los Angeles, while increasing its resident community.⁵ In this role, the Downtown Center will continue to accommodate the highest development densities in the City and function as the principal transportation hub for the region. Objective 3.11, which supports this goal is to provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.

The Housing Chapter of the Framework Element establishes the goal of striving to meet the housing needs of the population in a manner that contributes to stable, safe, and livable neighborhoods, reduces conditions of overcrowding, and improves access to jobs and neighborhood services, particularly by encouraging future housing development near transit corridors and stations. The policies of this chapter are intended to promote the provision of additional capacity for new housing units and encouraging production of housing for households of all income levels, while at the same time preserving existing residential neighborhood stability and promoting livable neighborhoods.

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and citywide scales. The Framework Element does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for

⁴ *City of Los Angeles General Plan Framework, Chapter 3 – Land Use – Downtown Center.*

⁵ *The Strategic Plan is discussed in this section, Sub-item (i), below.*

the updating of community plans. With respect to neighborhood design, the Framework's Urban Form and Neighborhood Design Chapter encourages growth in centers that have a sufficient base of both commercial and residential development to support transit service.

The Open Space and Conservation Chapter of the Framework Element calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes, and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract various types of economic development and investment to targeted districts and centers that continue the geographic distribution of job growth in the Los Angeles area. Goals, objectives, and policies focus on job retention and job creation while retaining commercial uses, particularly within walking distance of residential areas and rail and bus transit corridors and stations, and promoting business opportunities in areas where growth can be accommodated without encroaching on existing residential neighborhoods.

As shown on Figure 7-1 of the Economic Development Chapter, the Project Site is located within a Market-Linked Area.⁶ Market-linked areas can facilitate development with the removal of existing obstacles that would be unattractive from a market perspective. These areas have existing commercial centers and industrial concentrations that can capture large shares of the City's future growth. As further stated in the Economic Development Chapter, encouraging mixed-use commercial and residential developments through zoning, entitlement processes, and incentive programs will enhance market appeal.

The Transportation Chapter of the Framework Element acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City's economy, as well as the living environment of its citizens.⁷ The Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. The Transportation Chapter also stresses that transportation investment and policies would need to follow a strategic plan, including capitalizing on currently committed infrastructure and adoption of land use policies to better utilize committed infrastructure. The

⁶ *City of Los Angeles General Plan Framework, Chapter 7 – Economic Development Chapter, Figure 7-1.*

⁷ *City of Los Angeles General Plan Framework, Chapter 8 – Transportation Chapter, page 8-2.*

Transportation Chapter is implemented through the *Mobility Plan 2035, An Element of the General Plan* (Mobility Plan) (Los Angeles Department of Planning, adopted September 7, 2016).⁸ Refer to **Table IV.G-2, Project Consistency with Applicable Goals of the Mobility Plan 2035**, found in **Appendix H** of this Draft EIR, for the Project's consistency with the *Mobility Plan*.

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems (many of which are interrelated), including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future needs for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Generally, these encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes. The Infrastructure and Public Services chapter also calls for the City to develop a sustainable systems approach to public infrastructure planning, construction, and management that identifies opportunities to reduce the long-term cost to taxpayers.

The applicable policies and the consistency analysis of each of the Framework Element chapters are discussed in **Table IV.G-3, Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element**, found in **Appendix H** of this Draft EIR.

(ii) *City of Los Angeles General Plan Housing Element*

The 2013-2021 Housing Element of the General Plan is the City's blueprint for meeting housing and growth challenges. The 2013-2021 Housing Element was adopted on December 3, 2013, and contains current population and housing projections for the City.

The Housing Element identifies a need for more housing, as it stated that the "City of Los Angeles continues to grow, and with that growth comes the need for more housing – not only more units, but a broader array of housing types to meet evolving household types and sizes, and a greater variety of housing price points that people at all income levels can afford."

⁸ *City of Los Angeles Department of City Planning, The Mobility Plan 2035, An Element of the General Plan, adopted September 7, 2016.*

Chapter 6 of the Housing Element lists the goals, objectives, policies and programs that “embody the City’s commitment to meeting housing needs.” The City’s four housing goals are:

- **Goal 1:** A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.
- **Goal 2:** A City in which housing helps to create safe, livable and sustainable neighborhoods.
- **Goal 3:** A City where there are housing opportunities for all without discrimination.
- **Goal 4:** A City committed to preventing and ending homelessness.

Multiple policies support each of these four goals. A consistency analysis with the policies that are applicable to the Project is presented in **Table IV.G-4, Project Consistency with the Applicable Policies of the Housing Element**, found in **Appendix H** of this Draft EIR.

(iii) Central City North Community Plan

The City’s community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community for specific geographic areas. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Central City North Community Plan guides land uses on the Project Site and in the surrounding areas. The current plan (adopted December 15, 2000) sets forth planning goals and objectives to maintain the community’s distinctive character.

The Central City North Community Plan area is divided into seven subareas:

- Figueroa Terrace
- Alpine Hill
- Chinatown
- North Industrial
- Government Support

- Artists-in-Residence District
- South Industrial

The Project Site is located within the South Industrial subarea, which is bounded by the City of Vernon to the south, the Los Angeles River to the east, 3rd Street to the north, and Alameda Street to the west, is primarily made up of industrial uses with large warehouses, and truck and railroad yards. The Alameda Corridor terminates in this area of the Community Plan. Numerous warehouses, in the South Industrial subarea, have been recently converted to commercial uses and artists' lofts and studios. This area borders an area commonly referred to as the Arts District of downtown Los Angeles. The Central City North Community Plan encourages the continued use and expanded development of a thriving artist-in-residence community.⁹

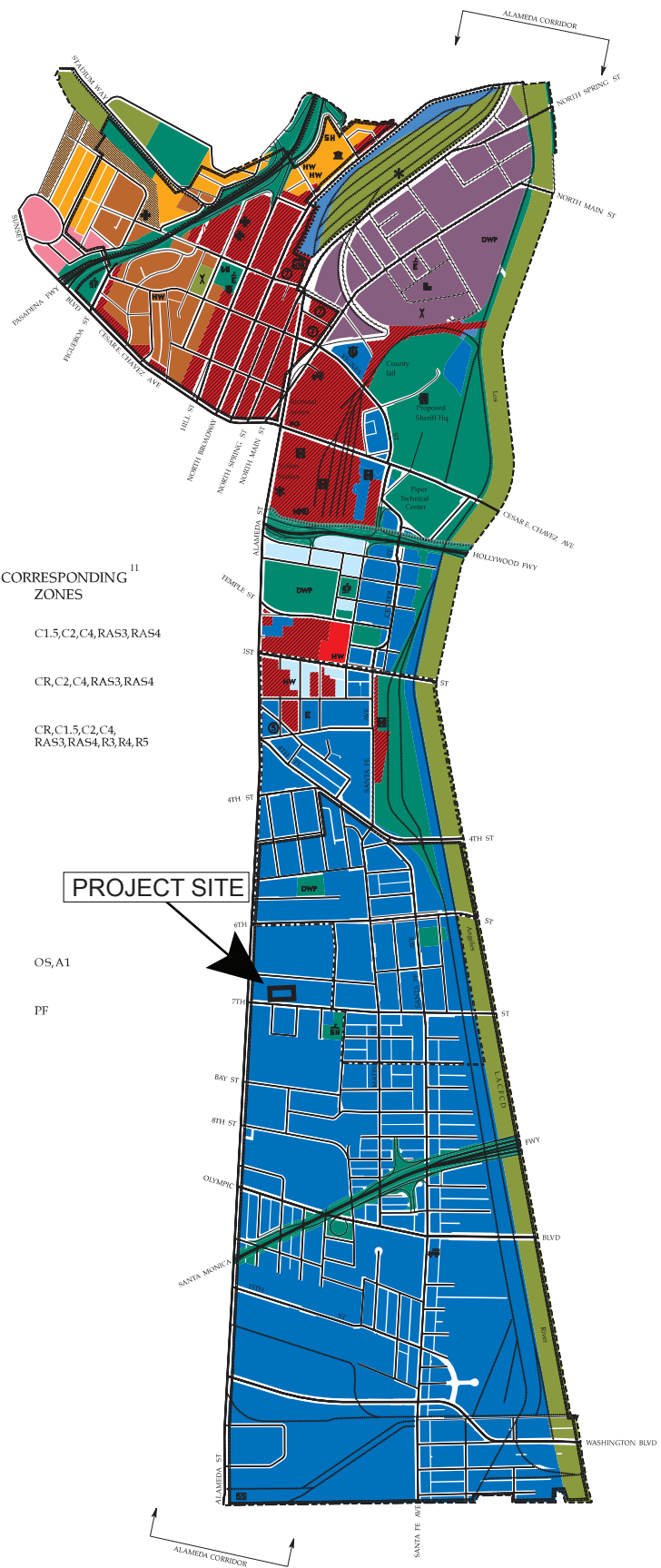
Currently, there is a joint update proposal, called the DTLA 2040, of the Central City Community Plan and Central City North Community Plan, the two community plans that comprise Downtown Los Angeles. The updated plans are intended to shape the future of Downtown Los Angeles by reinforcing its job orientation and supporting transit and pedestrian environment.¹⁰ In its current draft stage, the DTLA 2040 proposes a land use designation for the Project Site as Hybrid Industrial, which allows for hybrid industrial mixed uses, creative office, live/work, and production activity uses. The maximum FAR for the proposed land use designation would range between 3:1 and 6:1.¹¹

As shown in **Figure IV.G-1, Central City North Community Plan Land Use Designations**, the Community Plan designates the Project Site, which is located within the South Industrial subarea, for Heavy Industrial land uses. The Heavy Industrial land use designation permits a range of corresponding industrial zones that allow for a variety of industrial, commercial, and adaptive live/work uses and intensities. An assessment of the Project's compliance with the purpose of the Community Plan is presented in **Table IV.G-5, Project Consistency with Applicable Policies of the Central City North Community Plan**, and **Table IV.G-6, Project Consistency with Applicable Design Policies of the Central City North Community Plan**, both found in **Appendix H** of this Draft EIR.

⁹ City of Los Angeles, *Central City North Community Plan*, December 15, 2000.

¹⁰ City of Los Angeles Department of Planning, *DTLA 2040*.




¹¹ City of Los Angeles Department of Planning, *DTLA 2040*.



LAND USE

RESIDENTIAL ¹

MULTIPLE FAMILY

	LOW MEDIUM II
	MEDIUM
	HIGH MEDIUM

CORRESPONDING ZONES ¹¹

RD1.5, RD2, RW2, RZ2.5
R3
R4





COMMERCIAL

	GENERAL ⁴
	COMMUNITY ²
	REGIONAL

CORRESPONDING ZONES ¹¹

C1.5, C2, C4, RA53, RA54
CR, C2, C4, RA53, RA54
CR, C1.5, C2, C4, RA53, RA54, R3, R4, R5

INDUSTRIAL ¹

	COMMERCIAL INDUSTRIAL ⁶
	LIGHT ⁶
	HEAVY ⁶
	HYBRID INDUSTRIAL

CM, P
MR2, M2
M3
HI, CM, P

OPEN SPACE, PUBLIC FACILITIES

	OPEN SPACE ⁹
	PUBLIC FACILITIES ⁸

OS, A1
PF

PROJECT SITE

 Project Site

Source: Central City North Community Plan, General Plan Land Use Map, February 25, 2014.

Figure IV.G-1
Central City North Community Plan Land Use Designations

(iv) *Plan for a Healthy Los Angeles*

The Plan for a Healthy Los Angeles (Healthy LA Plan) lays the foundation to create healthier communities for all Angelenos, and serves as the Health and Wellness Element of the General Plan. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City of Los Angeles will strive to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The applicable policies and a consistency analysis of the Healthy LA Plan are discussed in **Table IV.G-7, Project Consistency with Applicable Policies of the Healthy LA Plan**, found in **Appendix H** of this Draft EIR.

(v) *Mobility Plan 2035 and 2010 Bicycle Plan*

The Mobility Plan 2035 now serves as the Transportation Element of the General Plan. The City Council initially adopted Mobility Plan 2035 in August 2015 and then readopted Mobility Plan 2035 in January 2016. Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their street. Mobility Plan 2035 includes five main goals that define the City's high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals.

The City's 2010 Bicycle Plan, adopted March 1, 2011, has been incorporated into the Mobility Plan 2035. It establishes long-range goals, objectives, and policies at a City-wide level and contains a range of programs to create a more bicycle-friendly Los Angeles. With the underlying purpose of increasing, improving, and enhancing bicycling in the City as a safe, health, and enjoyable means of transportation and recreation, the Bicycle Plan's main goals are to (1) increase the number and type of bicyclists in the City, (2) make every street a safe place to ride a bicycle, and (3) make the City of Los Angeles a bicycle-friendly community.

The Mobility Plan 2035 designates bicycle facilities with a Bicycle Enhanced Network (Low Stress Network) and a Bicycle Lane Network. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths. The Mobility Plan 2035 has designated 6th Street as a Tier 1 Protected Bicycle Lane and Mateo Street as a Tier 2 Bicycle Path.¹² The applicable goals and a consistency analysis of the Mobility Plan 2035

¹² *Mobility Plan 2035, An Element of the General Plan, City of Los Angeles, September 7, 2016, Map D1, Bicycle Enhanced Network (Low Stress Network) and Map D2, Bicycle Lane Network.*

are discussed in **Table IV.G-2, Project Consistency with Applicable Goals of the Mobility Plan 2035**, found in **Appendix H** of this Draft EIR.

(b) *Central Industrial Redevelopment Area*

The Project Site is located within the *Redevelopment Plan for the City Industrial Redevelopment Project* (Redevelopment Plan) area, as adopted on May 15, 2002, by the former Community Redevelopment Agency of Los Angeles (CRA/LA), which establishes a 30-year plan to eliminate and prevent the spread of blight.¹³ The Redevelopment Plan provides supplemental guidance for development. In 2011, Assembly Bill x1 26 dissolved all California redevelopment agencies, including the CRA/LA. The dissolution of the agencies became effective February 1, 2012. Assembly Bill x1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Redevelopment Plan and its requirements for development within the Redevelopment Project Area are still in effect. As the City declined to be the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed. The DLA is currently tasked with implementing and enforcing the requirements of the Redevelopment Plan, but active coordination continues between the City and the DLA regarding transferring those rights and responsibilities to the City of Los Angeles Department of City Planning. Accordingly, this Draft EIR assumes the continued applicability of the Redevelopment Plan and addresses the Project's consistency with the Redevelopment Plan. For purposes of this Draft EIR, any references to the CRA/LA are intended to reference the DLA and/or the Department of City Planning pursuant to these recent changes.

Community Plan land use and zoning designate land uses allowed within the Redevelopment Plan area. The Project Site, zoned M3-1-RIO, is designated for heavy industrial land uses. Land uses permitted in the M3-1-RIO zone include, but are not limited to, industrial and manufacturing uses and commercial uses permitted under the C2 Zone, such as restaurants, bars, studios, offices, and adaptive reuse into live/work units. The maximum FAR for the Redevelopment Plan area is 3:1, as set forth in Section 512 of the Redevelopment Plan. However, Section 512 of the Redevelopment Plan allows for higher maximum FARs through transfer of floor area. The applicable goals and a consistency analysis of the Redevelopment Plan are discussed in **Table IV.G-8, Project Consistency with Applicable Goals of the Redevelopment Plan**, found in **Appendix H** of this Draft EIR.

(c) *City of Los Angeles Planning and Zoning Code*

The Project is subject to applicable development standards set forth in the Planning and Zoning Code (LAMC Sections 11.00 *et seq.*). The Planning and Zoning Code includes

¹³ *City of Los Angeles Community Redevelopment Agency, Redevelopment Plan for the City Industrial Redevelopment Project, November 15, 2002.*

development standards for the various districts in the City. As shown in **Figure IV.G-2, City Zoning Designations**, the Project Site currently has a zoning designation of M3-1-RIO (Heavy Industrial Zone – Height District No. 1 – River Improvement Overlay District).

(i) *Permitted Land Uses*

Land uses allowed in the currently zoned M3 zone include most uses allowed in the M1, M2, MR1, and MR2 zones, which include most uses allowed in the C1, C1.5, and C2 zones. As described in the LAMC, there are exceptions to allowable uses within each permitted zone. Generally, allowable uses include restaurants, business and professional offices, medical clinics and laboratories, grocery stores, retail and service stores, pharmacies, drugstores, manufacturing and industrial activities, research and development, storage, and parking.¹⁴ Dwelling units and/or guest rooms are prohibited in the M3 zone.¹⁵

(ii) *Setback Requirements*

Pursuant to LAMC Section 12.20, within the M3 zone, front, side, or rear yard setbacks are not required.

(iii) *Height District and Floor Area*

The Project Site is located within Height District 1. The 1 indicates the Project Site is in an area that has no height limit and a permitted floor area ratio (FAR) of 1.5:1, or 1.5 times the lot area. The Redevelopment Plan also states that the FAR is limited for the Project Site to no more than 3:1. Notwithstanding, LAMC Section 14.5.7 permits a transfer of floor area (TFAR) not to exceed a maximum floor area of 13 times the buildable area.

(iv) *River Improvement Overlay District*

The Project Site is located within the Los Angeles River Improvement Overlay District (RIO), which requires new construction to meet development regulations addressing landscaping, screening, and fencing, and lighting, and orientation in association with the Los Angeles River. Pursuant to Ordinance No. 183,145, the purpose of the RIO District includes: supporting the goals of the Los Angeles River Revitalization Master Plan; contributing to the environmental and ecological health of the City's watersheds; establishing a positive interface between river adjacent property and river parks and/or greenways; promoting pedestrian, bicycle and other multi-modal connections between the river and its surrounding neighborhoods; providing native habitat and supporting local

¹⁴ LAMC Section 12.20.A.

¹⁵ LAMC Section 12.20.A.



■ Project Site

Source: City of Los Angeles Planning Zimas Maps, May 2017.

Figure IV.G-2
City Zoning Designations

species; providing an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; providing safe, convenient access to and circulation along the river; promoting the river identity of river adjacent communities; and supporting the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program.

(v) *East Los Angeles State Enterprise Zone*

Enterprise zones are specific geographic areas designated by City Council, and have received approval from the California Department of Commerce under either the Enterprise Zone Act Program or Employment And Economic Incentive Act Program to receive economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. Pursuant to LAMC Section 12.21A(x)(3), projects located within the East Los Angeles State Enterprise Zone are allowed to utilize a lower parking ratio for general commercial office, business, retail, restaurant, to provide two parking spaces per 1,000 square feet of gross commercial floor area.

(d) *Department of City Planning Walkability Checklist*

In January of 2007, the Department of City Planning created the *Walkability Checklist: Guidance for Entitlement Review* (Walkability Checklist). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the Framework Element. Incorporating these guidelines into a project's design encourages pedestrian activity, more adequate forms, and place making.

(e) *Industrial Land Use Policies*

On January 3, 2008, the City of Los Angeles Department of City Planning and the Community Redevelopment Agency prepared a memorandum on Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses. The City of Los Angeles Industrial Land Use Policy (ILUP) was prepared to retain industrial land for job producing uses. The ILUP Memo contains "Attachment A - ILUP Geographically Specific Directions" which includes the Central City North-Alameda Industrial Area Directions map that designates the block including the Project Site as an Employment Protection District (EMP). EMP District is defined as:

Areas where industrial zoning should be maintained, i.e., where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate.¹⁶

According to the ILUP Geographically Specific Directions, the Project Site is located within Analysis Area 5 of the Central City North-Alameda Employment Protection Area. The Project Site is designated as industrial land with a survey land use of “light industrial”. In 2006, 47 percent of the existing land use within Alameda Analysis Area 5 was light industrial.¹⁷

The *Alameda Industrial Area Data and Recommendations*, completed in 2006, recommendations for Alameda Analysis Area 5 were to:

- Preserve industrial zoning consistent with Central City North Community Plan; and
- allow industrial and ancillary commercial uses.¹⁸

Neither the ILUP study nor the ILUP Memo took any action to change land use designations or zoning with respect to industrial land. The ILUP Memo was written to provide both short- and long-term guidance to City staff during the updating of community plans and zoning code at that time, along with other policies to accommodate the changing nature of industrial land uses. However, in December 2007 the City of Los Angeles Department of City Planning and the Community Redevelopment Agency prepared the *Los Angeles’ Industrial Land: Sustaining a Dynamic City Economy*, which clarifies the Artist-In-Residence District is the only district where the City encourages residential development in the industrial area.

The ILUP Memo addresses a variety of community benefits, such as affordable housing and open space, which may be provided by projects located in an EMP with an approved change of use application.¹⁹ In order to permit the development of residential uses in such areas, the community benefits are incorporated to ensure compatibility and to compensate for the permanent loss of employment land. However, as stated in the ILUP

¹⁶ *City of Los Angeles Department of Planning and Community Redevelopment Agency, Memorandum for Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses, January 3, 2008.*

¹⁷ *City of Los Angeles Department of Planning and Community Redevelopment Agency, Memorandum for Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses, January 3, 2008, Attachment A.*

¹⁸ *City of Los Angeles Department of Planning and Community Redevelopment Agency, Alameda Industrial Area Data and Recommendations, December 5, 2006.*

¹⁹ *City of Los Angeles Department of Planning and Community Redevelopment Agency, Memorandum for Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses, January 3, 2008.*

Clarification Memo, if Community Benefits are not assessed, findings must be provided as to why a project does not require such Community Benefit.

(f) *Citywide Design Guidelines*

The City's General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence. The Citywide Design Guidelines provide guidance for applying policies contained within the General Plan Framework and the City's 35 Community Plans. The Citywide Design Guidelines are particularly applicable to those areas within the City that do not currently have adopted design guidelines contained in a Community Plan Urban Design chapter, specific plan, or other community planning documents. They provide guidance for new Community Plan updates. Per the Citywide Design Guidelines, in instances where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter, a specific plan, or a community-specific guideline such as the Downtown Design Guide, the community-specific requirements prevail.²⁰ The applicable standards and a consistency analysis of the Citywide Design Guidelines are discussed in **Table IV.G-9, Consistency with Applicable Standards and Guidelines of the Citywide Design Guidelines**, found in **Appendix H** of this Draft EIR.

(g) *Transit Priority Area*

The Project is located within a Transit Priority Area (TPA) pursuant to Senate Bill 743, due to its proximity to a "major transit stop" as defined in Public Resources Code Section 21064.3. The PRC defines a TPA as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. Metro runs multiple bus lines, including local and rapid lines, along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue in the area. The nearest stop is 7th/Mateo, approximately 0.1 mile south of the Project Site.

²⁰ City of Los Angeles Department of City Planning, *Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed Use Projects, Checklist for Project Submittal*.

b) Existing Conditions

(1) Project Site

(a) Existing On-Site Land Uses

The Project Site is located at 668-678 S. Mateo Street, and 669-679 S. Imperial Street in the Arts District, on the eastern edge of downtown Los Angeles and consists of eight contiguous lots associated with Assessor Parcel Number 5164-020-021. The Project Site is currently developed with one single-story industrial warehouse that occupies approximately 27,000 square feet of floor area, and an associated surface parking lot. Nearly the entire Project Site is paved with concrete and asphalt. The warehouse fronting Mateo Street and Imperial Street is built to both those lot lines. Security gates at Mateo Street and Imperial Street restrict vehicular access to the Project Site. The relatively flat Project Site is approximately 1.03 acres and is bounded by Mateo Street to the west, Imperial Street to the east, a one-story warehouse building that has been converted into a small grocery/market use, associated surface parking lot and Jesse Street to the north, and single-story industrial and commercial buildings, associated surface parking lots, and E. 7th Street to the south. Photos of the existing land uses on the Project Site are presented in **Figure II-2** and **II-3**, Views of Project Site, in **Section II, Project Description**.

(b) Surrounding Land Uses

The Project Site is located within the South Industrial subarea, as designated in the Central City North Community Plan. The South Industrial subarea, which is bounded by the City of Vernon to the south, the Los Angeles River to the east, 3rd Street to the north, and Alameda Street to the west, is primarily made up of large warehouses, truck and railroad yards. Numerous warehouses, in the South Industrial subarea, have been recently converted into artist lofts and studios. This area is also commonly referred to as the Arts District of downtown Los Angeles. The Project Site is also located within the Arts District area, which has been developed since the early 1900s. The Arts District is located to the east of the Little Tokyo District and Central City East/Toy District, west of the Los Angeles River, south of the US-101, and north of the I-10. The Arts District encompasses an area that has been transitioning from predominantly industrial warehouses to also include creative spaces, including live/work units, commercial uses (e.g., retail shops, restaurants, and studios), multi-family residential, etc.²¹ The Project Site has frontage along Mateo Street and Imperial Street, which are lined with industrial, commercial, and live/work uses. The land uses within the Property's general vicinity are characterized by a mix of low- to medium-intensity industrial, commercial, and live/work uses which vary

²¹ Arts District Los Angeles website.

widely in building style and period of construction. The surrounding properties include industrial, commercial retail, studio, bar, café, restaurant, low-rise and mid-rise adaptive reuse buildings with live/work components, and surface parking lots. The six-story mixed-use Toy Factory Lofts and the seven-story mixed-use Biscuit Company Lofts are located across Mateo Street to the west. In addition, the new seven-story mixed-use Amp Lofts, comprised of 320 live/work units and 20,000 square feet of ground floor retail space, is located on a parcel directly east of the Project Site, across Imperial Street. While the majority of properties in the surrounding area are designated and zoned heavy industrial and manufacturing, the implementation of the Adaptive Reuse Ordinance has allowed for residential uses within the live/work components, with neighborhood commercial uses to complement the residential population.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, the Project would have a significant impact in regard to land use and planning if it would:

- a) *Physically divide an established community; or***
- b) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate land use and planning impacts:

(1) Land Use Consistency

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

(2) Land Use Compatibility

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

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

b) Methodology

State CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies with applicable plans. Additionally, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by *State CEQA Guidelines* Section 15382. An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

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

Analysis of conflicts and consistency with applicable plans is included in this impact section. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Office of Planning and Research (OPR), State of California General Plan Guidelines (2017). Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan’s overall goals and objectives but need not be in perfect conformity with every plan policy.

In addition, to the extent that the projects’ potential conflict with a plan, program or policy is analyzed in another section of the EIR (e.g., Air Quality Management Plan in the Air Quality section and the Mobility 2035 Plan in the Transportation section) that plan is not further discussed in the Land Use Section.

In assessing impacts related to land use and planning in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the Thresholds Guide will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

c) Project Design Features

No specific Project Design Features are proposed with regards to land use and planning.

d) Analysis of Project Impacts

As compared to the Project, the Increased Commercial Flexibility Option (Flexibility Option) would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately. Further, for certain thresholds, the impacts of the Project were addressed in the Initial Study (see **Appendix A.2** of this Draft EIR) and were determined to be less than significant, with no further analysis required. However, since the Flexibility Option was not specifically addressed in the Initial Study, the analysis of the Flexibility Option is presented in this section for those thresholds.

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

(1) Impact Analysis

(a) Project

As discussed in the Initial Study (**Appendix A.2**), the Project would not physically divide an established community. **Therefore, the Project would have no impact with respect to Threshold a), and no mitigation measures are necessary.**

(b) Increased Commercial Flexibility Option

Similar to the Project, the Flexibility Option would not physically divide an established community because there is no existing residential use on the Project Site, or a residential use that would be physically separated or otherwise disrupted, as non-residential development currently exists within the boundaries of the Project Site, and development of the Flexibility Option would remain within the boundaries of the existing Project Site. **Therefore, the Flexibility Option would have no impact with respect to Threshold a), and no mitigation measures are necessary.**

(2) Mitigation Measures

The Project and the Flexibility Option would have no impacts with regard to dividing an established community; no mitigation measures are required.

(3) Level of Significance After Mitigation

The Project and the Flexibility Option would have no impacts with regard to dividing an established community.

Threshold b) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the consistency of the Project or the Flexibility Option to applicable City plans, programs, ordinances or policies related to land use would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

As previously discussed, the development of the Project would be subject to numerous City land use plans, policies, and regulations, including the development regulations in the LAMC. An analysis of the Project's conflicts and consistency with the policies and goals of applicable land use plans and policy documents are discussed below. As discussed previously in the Introduction, consistency with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR.

(a) 2016-2040 and 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

Conflicts and consistency of the Project with the 2016-2040 RTP/SCS is addressed in **Table IV.G-1, Consistency with Applicable Goals of 2016-2040 RTP/SCS**, found in **Appendix H** of this Draft EIR.

Based on the analysis presented in **Table IV.G-1**, found in **Appendix H** of this Draft EIR, the Project would not be in conflict and would be consistent with applicable 2016-2040 RTP/SCS goals. The Project would be located in an area well-served by public transit provided by Metro. Metro provides local bus service in the Project area along E. 6th Street, Alameda Street, and Santa Fe Avenue. In anticipation of the region's planned growth, Metro has several transit investment projects in the planning phases, including the

expansion of the West Santa Ana line, with a possible stop at 7th Street and Alameda, and recently added DASH stops by LADOT that would improve service in the Arts District.²² The Project would include short-term and long-term bicycle facilities and create a pedestrian-friendly environment by providing a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. In addition to these transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities in the Arts District area.

As shown in **Table IV.G-1**, found in **Appendix H** of this Draft EIR, the Project would not be in conflict and would be consistent with the 2016-2040 goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation.

It should be noted that the circulation of the Notice of Preparation (NOP) for the Project was on [February 23, 2018], prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS. However, as the 2020-2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the goals and strategies from the previous plan are incorporated and have been updated or expanded upon. As described above, the Project is comprised of 185 live/work units, 20 live/work units deed restricted for Very Low Income households, and commercial uses, and the Project would be located in an urban area well-served by public transit provided by Metro, which as previously mentioned has several transit investment projects in planning phases, including bicycle facilities. Furthermore, the integration of land uses on the Project Site would produce reductions in mode share to and from the Project Site that would help the region accommodate growth and meet the goals of the RTP/SCS that minimize per capita GHG emissions, and would therefore similarly not conflict with the goals of the 2020-2045 RTP/SCS.

Therefore, the Project or the Flexibility Option would result in a less than significant impact as it would not conflict with the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS.

²² *Metro, West Santa Ana Branch Transit Corridor-Overview.*

(b) *City of Los Angeles General Plan Framework Element*

The consistency of the Project with applicable objectives and policies in the Framework is presented in **Table IV.G-3, Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element**, found in **Appendix H** of this Draft EIR.

The Project would be consistent with the policy and objectives of the Land Use Chapter by support the needs of the City's existing and future residents, businesses, and visitors by providing live/work units and commercial uses, including general commercial, restaurant, retail, office, and art production-related uses. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution while supporting the City's objective to encourage commercial uses along primary transit corridors/boulevards and in designated Community Centers areas.

The Project would be consistent with the policy and objective of the Housing Chapter by providing a range of new housing units near existing transit. The scale and character of the Project is consistent with the surrounding urbanized area.

The Project would be consistent with the goal, objectives and policies of the Urban Form and Neighborhood Design Chapter by providing new residential, office, commercial uses and open space available to the public and streetscape improvements that would enhance pedestrian activity.

The Project would be consistent with the Open Space and Conservation Chapter by providing minimum of approximately 15,320 square feet of on-site open space and approximately 14,160 square feet under the Flexibility Option. The Project's various amenities would include a swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. In addition, a number of live/work units would include private balconies. The Project would provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets.

The Project would be consistent with the Economic Development Chapter by bringing new economic investment to Arts District in an area well served by existing transit. Furthermore, the Project would contribute to the establishment of a 24-hour community that would benefit existing businesses of the area.

The Project would be consistent with the Transportation Chapter by supporting an area targeted for high-density and a focal point of region commerce identity and activity

through the provision of additional housing, office and commercial uses and employment opportunities for the Arts District area. The Project would augment the streetscape with retail and dining uses along with streetscape improvements that would enhance pedestrian circulation.

The Project would be consistent with the Infrastructure and Public Services Chapter by reducing the amount of hazardous substances and the total amount of flow entering the wastewater system through implementation of Stormwater Pollution Plan and Best Management Practices. The Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and its water demands will be met by the City of Los Angeles Department of Water and Power (LADWP).

In summary, with approval of the requested General Plan Amendment to amend the adopted Central City North Community Plan land use designation for the Project Site from Heavy Industrial to Regional Center Commercial the Project would be consistent with the applicable goals, objectives, and policies in the General Plan Framework Element. **Therefore, the Project or the Flexibility Option would result in a less than significant impact as it would not conflict with the General Plan Framework Element.**

(c) City of Los Angeles General Plan Housing Element

The Project's consistency with applicable objectives and policies of the Housing Element is presented in **Table IV.G-4, Project Consistency with Applicable Policies of the Housing Element**, found in **Appendix H** of this Draft EIR.

Based on the analysis presented in **Table IV.G-4**, found in **Appendix H** of this Draft EIR, the Project would be consistent with the applicable objectives and policies in the Housing Element. The Project would provide 185 new live/work units that would add to the citywide housing supply. The Project would be a mixed-use development that would include new jobs associated with office, retail and restaurant uses that is accessible to Metro local and rapid bus lines along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue. In addition, The Project would promote and facilitate reduction of water consumption through the use of water saving and energy saving devices such as low-flow toilets and urinals. Finally, the Project would be an infill, urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the Central City North Community Plan and the Redevelopment Project. **Therefore, the Project would result in a less than significant impact as it would not conflict with the Los Angeles General Plan Housing Element.**

As previously discussed, the overall design, configuration, and operation of the Flexibility Option would be comparable to the Project. Although there would be an increase in commercial square footage and a reduction in total live/work units the building parameters would remain unchanged. Additionally, the amount of common open space provided

under the Flexibility Option would be similar to the Project, and the amount of private open space would be reduced by approximately 450 square feet commensurate to the reduction in live/work units. The Flexibility Option would provide 159 new live/work units to the citywide housing supply. **Therefore, based on the analysis shown in Table IV.G-4, found in Appendix H of this Draft EIR, or the Flexibility Option would result in a less than significant impact as it would not conflict with the Los Angeles General Plan Housing Element.**

(d) *Central City North Community Plan*

The consistency of the Project with applicable policies and objectives in the Central City North Community Plan is presented in **Table IV.G-5, Project Consistency with Applicable Objectives and Policies of the Central City North Community Plan**, found in **Appendix H** of this Draft EIR.

The Community Plan designates the Project Site for Heavy Industrial land uses. However, the Project Applicant is requesting a General Plan Amendment to amend the adopted Central City North Community Plan's land use designation from the current "Heavy Industrial" land use designation to "Regional Center Commercial" land use designation. The Regional Center land use designation permits a range of corresponding commercial zones that allow for a variety of commercial and adaptive live/work uses and intensities. In addition, the Project would provide a mix of uses on the eastern edge of Downtown Los Angeles. The scale of the Project is appropriate to the neighborhood as there are several multi-story developments along Mateo Street, such as the six-story mixed-use Toy Factory Lofts at 1855 Industrial Street, located approximately 58 feet west of the Project Site across Mateo Street, and the seven-story mixed-use Biscuit Company Lofts at 1850 Industrial Street, located approximately 57 feet west of the Project Site across Mateo Street. Furthermore, the Project would be consistent with the proposed 2040 DTLA Community Plan land use designation of Hybrid Industrial, which places an emphasis on new construction that prioritizes space for employment, including light industrial, new industry, commercial, and vertically-integrated businesses, with a careful introduction of live-work uses. **Therefore, with the approval of the General Plan Amendment the Project or the Flexibility Option would not conflict with the applicable policies in the Central City North Community Plan.**

As shown in **Table IV.G-6, Consistency with Applicable Design Policies of the Central City North Community Plan**, found in **Appendix H** of this Draft EIR, the Project would implement a number of applicable commercial, residential, and design and landscaping policies and, accordingly, would be consistent with the applicable design policies in Central City North Community Plan. The Project would not implement Industrial Policies 3-1.1 and 3-3.1 as the zoning for the Central City North Community Plan's land use designation for the Project Site is proposed to be amended from the

current “Heavy Industrial” land use designation to “Regional Center Commercial” land use designation. However, the Project would be consistent with the remainder of the policies referenced in **Table IV.G-6, Consistency with Applicable Design Policies of the Central City North Community Plan**, found in **Appendix H** of this Draft EIR. **Therefore, even though the Project or the Flexibility Option would not implement Industrial Policies 3-1.1 and 3-3.1 as the zoning for the Central City North Community Plan’s land use designation for the Project Site is proposed to be amended from the current “Heavy Industrial” land use designation to “Regional Center Commercial” land use designation, the Project or the Flexibility Option would result in a less than significant impact with regard to consistency with the applicable design policies of the Central City North Community Plan.**

(e) *Plan For A Healthy Los Angeles*

The Plan for a Healthy Los Angeles is the new Health and Wellness Element of the General Plan. The Plan for a Healthy Los Angeles identifies seven primary goals and associated objectives and policies and possible programs that serve as the implementation blueprint for creating healthier, vibrant communities. As shown in **Table IV.G-7, Consistency with Applicable Policies of the Healthy LA Plan**, found in **Appendix H** of this Draft EIR, the Project would implement a number of the Healthy LA Plan policies.

As shown in **Table IV.G-7**, found in **Appendix H** of this Draft EIR, the Project promotes healthy building design by providing an enhanced pedestrian-oriented design with ground floor retail uses, outdoor dining facilities, open space and recreation facilities for tenants, guests and the public. The Project promotes active transportation with the provision of long term and short-term bicycle stalls. In addition, the Project repurposes an underutilized space by converting a warehouse and surface parking lot into a mixed-use project with live/work, office, and commercial amenities, which enhances the built environment in the surrounding Project vicinity. Open Space includes a swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. The Project would concentrate new development and jobs within an infill site that is walking distance to several Metro bus lines along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue, which helps reduce vehicle use and thereby reduce emissions from mobile sources. Finally, the Project is located within proximity to existing employment centers with public transportation options. **Therefore, the Project or the Flexibility Option would not conflict with the applicable policies in Healthy LA Plan and impacts would be less than significant.**

(f) *Mobility Plan 2035 and 2010 Bicycle Plan*

The consistency of the Project with applicable goals in the Mobility Plan 2035 is presented in **Table IV.G-2, Project Consistency with Applicable Policies of the Mobility Plan 2035**, found in **Appendix H** of this Draft EIR.

The Project would be consistent with the relevant policies that support the goals and objectives of Mobility Plan 2035, as detailed in **Table IV.G-2**, found in **Appendix H** of this Draft EIR. Specifically, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing a construction management plan that would identify the location of any temporary lane and sidewalk closures and provide for measures to maintain both directions of travel. Also, by contributing a wider range of land uses and providing much needed housing to a burgeoning mixed-use area, most errands could be accomplished without the need of a single-passenger vehicle, thus reducing VMT. The Project Site's location in downtown Los Angeles is in close proximity to several bus routes, all of which would provide residents, employees, and guests with various public transportation opportunities that would reduce vehicle miles. In addition, 30 percent of the Project's required parking spaces would be electric-vehicle ready, and ten percent of its required parking spaces would provide chargers for electric vehicles within the parking structure on the Project Site, thereby further reducing consumption of petroleum-based fuels. The Project would provide enhancements to ensure a quality pedestrian environment along Mateo Street and Imperial Street with new and additional street trees and landscaping and sidewalk paving elements. In addition, the Project would contribute to the City's policy to provide safe and convenient bicycle facilities by providing on-site short-term and long-term bicycle spaces. Additionally, given the location of the Project Site along and in close proximity to transit, the Project would provide residents, visitors, patrons, and employees convenient access to transit services. **Therefore, the Project or the Flexibility Option would not conflict with the applicable policies that support the goals and objectives set forth in the Mobility Plan 2035 and impacts would be less than significant.**

(g) *Central Industrial Redevelopment Area*

The consistency of the Project with applicable goals in the Redevelopment Plan is presented in **Table IV.G-8, Project with Applicable Goals of the Central Industrial Redevelopment Plan**, found in **Appendix H** of this Draft EIR.

As shown in **Table IV.G-8**, found in **Appendix H** of this Draft EIR, the Project promotes economic, social, and physical well-being through the revitalization of an infill site with a mixed-use development with new housing and employment opportunities in walking distance to Metro transportation facilities. The Project includes new residential housing providing 185 live/work units within the Arts District. The Project would provide retail,

restaurant, and office and art production-related uses accessible to Project tenants, guests, and the public. **Therefore, the Project or the Flexibility Option would not conflict with the applicable goals of the Central Industrial Redevelopment Project and impacts would be less than significant.**

(h) *City of Los Angeles Planning and Zoning Code*

(i) *Permitted Uses*

As discussed previously, the Project Site is located in the M3 (Heavy Industrial) zone. Uses that are allowed in an M3 zone include all of the uses allowed in the M1, M2, MR1, and MR2 zones and, as such, generally include most uses allowed in the C1, C1.5, and C2 zones.²³ Permitted uses include, among others: restaurants, business and professional offices, medical clinics and laboratories, grocery stores, retail and service stores, pharmacies, drugstores, manufacturing and industrial activities, research and development, storage, and parking. Buildings containing dwelling units or guest rooms are prohibited in the M3 zone.

The Project would include live/work units and general commercial, restaurant, retail, office and art production-related land uses that would be inconsistent with the existing M3 zoning for the Project Site. Therefore, the Project is seeking a General Plan Amendment from Heavy Industrial land use designation to Regional Commercial Center and a Vesting Zone Change from M3-1-RIO to C2-2-RIO, which would allow for the Project's proposed mix of uses. Pursuant to LAMC Section 12.14, the following commercial uses are expressly permitted in the C2 zone: art or antique shop; bird store or taxidermist; carpenter, plumbing, or sheet metal shop; catering shop; feed and fuel store; interior decorating or upholstering shop; sign painting shop; tire shop; and restaurant, tea room, or café. In addition, the C2 zone permits uses permissible in the CR, C1, and C1.5 zones, which generally includes banks, offices, hotels, retail stores, live/work units, and nursing care facilities. Residential uses and density in a R5 zone, such as apartment houses, duplexes, and single-family dwellings, are also permitted. Through regulatory compliance, the Project would also be required to meet all other regulations of the zone, including height, density, setback, parking, open space, and other standards and provisions. **With approval of the Vesting Zone Change, the Project or the Flexibility Option would not conflict with the zoning for the Project Site, and impacts would be less than significant.**

(ii) *River Improvement Overlay District*

The Project Site falls within the Los Angeles River Improvement Overlay District, which requires new construction to meet development regulations addressing landscaping,

²³ LAMC Section 12.20.A.1.

screening and fencing, lighting, and orientation in association with the Los Angeles River. As shown on **Figures II-20 through II-22** in **Section II, Project Description**, of this Draft EIR, the landscape plan shows design elements included as part of the Project specifically to meet the Los Angeles River Improvement Overlay District regulations, including landscaping with native trees, plants and shrubs; recreational amenities, such as a swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. Prior to issuance of a building permit, the Project Applicant would be required to consult with the Department of City Planning to obtain an Administrative Clearance for compliance with all of the applicable regulations of the Los Angeles River Improvement Overlay District. As such, the Project would be required to comply with the Los Angeles River Improvement Overlay District. **Therefore, the Project or the Flexibility Option would not conflict with the Los Angeles River Improvement Overlay District would be less than significant.**

(iii) East Los Angeles State Enterprise Zone

As previously identified, the Project Site is located within the Los Angeles-Hollywood Enterprise Zone. Through the Enterprise Zone program, the federal, state, and city governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. The City's Enterprise Zone (ZI No. 2374) provides special provisions applicable to plan check with include increased height (LAMC Section 12.21.4) and reduced parking requirements (LAMC Section 12.21-A.4(i)). Increased height is only available for Height Districts with an "EZ" suffix, which is not applied to the Project Site. As such, the Enterprise Zone height incentive does not apply to the Project Site. However, the Project is eligible and will be complying with the Los Angeles Enterprise Zone provisions for reduced parking requirements in the form of 2 parking spaces for every 1,000 square feet of commercial/retail space. **Therefore, impacts related to the Project or the Flexibility Option's consistency with the East Los Angeles State Enterprise Zone would be less than significant.**

(i) Los Angeles Green Building Code

The Project would have numerous green building design features, including a highly efficient HVAC system (which would be subject to an enhanced commissioning process to ensure operational energy efficiency). The Project would include waterless urinals, ultra-low-flow toilets in all bathrooms, low-flow aerators, and appropriate landscaping, which would reduce water use by at least 50 percent. (See **Section IV.M.1, Utility and Service Systems – Water**, of this Draft EIR, for additional information regarding the Project's water use.

Also, the Project would use low-VOC paints, coatings, adhesives, and sealants indoors to the maximum extent feasible. (See Section **IV.A, Air Quality**, of this Draft EIR, for additional information regarding air quality and **Section IV.N, Energy**, of this Draft EIR, for additional information regarding energy use.)

In addition, the Project is located in the dense Arts District community of Downtown Los Angeles, where bus and rail transit is readily available. The Project's convenient location to bus and rail transit, and pedestrian-friendly design and provision for bicycle racks, would provide alternate means of access to the Project, primarily by employees and residents but also to a lesser extent by visitors, which would reduce automobile trips and associated emissions, thereby improving air quality and promoting active transportation modes. **Therefore, impacts related to the Project or the Flexibility Option's consistency with the Los Angeles Green Building Code would be less than significant.**

(j) Department of City Planning Walkability Checklist

While the guidance provided by the Walkability Checklist is not mandatory and is not a part of the LAMC, incorporating the criteria listed to the maximum extent feasible would create a more walkable environment and a higher quality of urban form for the Project. The essential purpose of the Walkability Checklist is to guide Department of City Planning staff in working with developers to make developments more "walkable" by way of enhancing pedestrian activity, access, comfort, and safety. In addition, the Walkability Checklist encourages planners and developers to protect neighborhood character and pursue high-quality urban form. The following is an analysis of the Project's consistency with the applicable guidelines.

(i) Sidewalks

The Project would maintain the existing pedestrian walkways along Mateo and Imperial Streets. The Project would provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The commercial uses would consist of several establishments, each with its own entrance directly from the street or paseo. In addition, the building would employ glass to indicate the entries to commercial uses, which would be easily accessible to pedestrians.

(ii) Utilities

The Project generally supports the walkability guidelines regarding utilities, which describe that ideally utilities should be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and

minimize obstructions in the pedestrian travel path. The Project would place all utility equipment within and around the perimeter of the Project Site underground and/or in the specified zones outlined in the Walkability Checklist.

Per LADWP standards, the proposed domestic water lines would have the meter installed in an underground vault in the sidewalk, and the fire water lines would have the detector check installed in an underground vault in the sidewalk. The backflow preventers for the water lines would be private and would be located on private property, either within the building or along the Project Site perimeter, maintaining 12 feet of clearance. Equipment would be buffered with landscaping, if outside the building.

The proposed sewer line would be located underground within the public right-of-way.

The proposed storm drain would either discharge through curb face via a parkway drain, located underneath the sidewalk, or be hard-piped to a catch basin, which would be also located underneath the public sidewalk. Therefore, the Project would be substantially consistent with Walkability Checklist guidelines related to utilities.

(iii) Building Orientation

The Project generally supports the walkability guidelines discussing building orientation, which provide that a building's placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. Pedestrian access would be provided via the approximately 10- to 13-foot sidewalk along Mateo Street, the 8- to 13-foot sidewalk on Imperial Street, and the landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east-west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. Pedestrian access to the Project's various components would be provided from Mateo Street and Imperial Street via a paseo into the Project and building entrances oriented along these streets. Pedestrian access to the commercial spaces on the second level would be accessible from the Project's courtyard deck via elevators and stairs. Pedestrian access to the live/work component would also be accessible from Mateo Street and Imperial Street, with Mateo Street providing the primary access to the live/work lobby. Therefore, the Project would be consistent with Walkability Checklist guidelines related to building orientation.

(iv) Off-Street Parking and Driveways

The Project generally supports the walkability guidelines discussing off-street parking and driveways, which provide that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. Vehicle access into the shared parking garage for the commercial and live/work uses would be available from

Imperial Street to the three subterranean levels of the parking garage. The Project would provide approximately 287 parking spaces with or without the Flexibility Option. In addition, the Project, would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements, and would provide 30 percent of its required parking spaces with conduit and ten percent of its required parking spaces would have chargers for electric vehicles within the parking structure on the Project Site. Delivery vehicles would also access the Project from Imperial Street, where there would be a designated loading area. Overall, the Project, which would include a landscaped pedestrian paseo connecting Mateo Street to Imperial Street, was designed to prevent conflicts between vehicular access and pedestrian activity as well as providing for pedestrian safety throughout the Project Site and vicinity of the Project. Therefore, the Project would be substantially consistent with Walkability Checklist guidelines related to off-street parking and driveways.

(v) *On-Site Landscaping*

While building plans are still in the preliminary phase, the Project would be designed to generally support the walkability guidelines regarding on-site landscaping. Each street would include landscaping intended to create a pedestrian friendly environment and a pleasing transition from the street to the building. The Project would incorporate landscaping that would facilitate pedestrian movement where appropriate and would provide separation between service areas and public zones, as well as to define edges throughout the varying elements of the Project. Extensive landscaping would be provided at the Project's ground floor, including at the entrances to the commercial and residential components of the building, along the sidewalk.

The Project's approximately 15,320 square feet of open space (approximately 14,160 square feet under the Flexibility Option) and residential amenities would be located in several distinct areas, generally located on the ground, second, and eighth level. The Project's various amenities would include a swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. In addition, a number of live/work units would include private balconies.

The Project would provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities.

The only trees on the Project Site are within planters inside the access gate along Mateo Street. One of the trees is a Hollywood Juniper (*Juniperus chinensis*) and one tree is a Yucca tree (*Yucca elephantipes*). Along Mateo Street is a Silk Oak (*Grevillea robusta*)

street tree and along Imperial Street are five Crape Myrtle (*Lagerstroemia indica*) street trees. The existing street trees and on-site trees would be removed during construction. Removal of all street trees in the public right-of-way would require approval of the Board of Public Works, and all existing street trees would be replaced at a ratio of 2:1 in accordance with the requirements of the Urban Forestry Division. Furthermore, the Project proposes to provide at least 46 trees in the common open space areas. The common open space areas will also include various large, medium, and low shrubs and groundcovers. Therefore, the Project would be substantially consistent with Walkability Checklist guidelines related to on-site landscaping.

(vi) *Building Façade*

The Project generally supports the walkability guidelines regarding building façade, which describe that a building's façade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. The Project is a proposed mixed-use development that would provide live/work living opportunities, as well as new dining and shopping options, in close proximity to regionally serving transit. This is an improvement over the existing building façade conditions, which are comprised of an industrial building constructed in 1978 as a warehouse and office building that occupies approximately 27,000 square feet of floor area, and an associated surface parking lot. The building is rectangular in plan and one story in height with a flat roof covered in rolled asphalt with a concrete parapet. The exterior of the building consists of concrete. Security gates at Mateo Street and Imperial Street restrict vehicular and pedestrian access to the Project Site. Nearly the entire Project Site is hardscaped with concrete and asphalt.

As the Project is located within the Arts District community of Downtown Los Angeles, the proposed building has been designed to reflect the nearby industrial, arts production, residential, and general commercial uses. The Project would feature sculptural elements, including a custom-shaped freestanding building that emerges from a single-story base oriented west toward the Industrial Street/Mateo Street T-intersection. The corner of the building, at the intersection of Industrial Street and Mateo Street, would consist of sculpted glass. The remainder of the Mateo Street façade above ground level would consist of masonry and a regular grid of large windows. The materials palette is intended to complement the decorative brick of surrounding buildings and the texture of corrugated metal. There would also be opportunities for wall art on the north-facing wall along the ground level. In addition, the parking on the subterranean levels is completely hidden from view. The Project would promote the public convenience and welfare by enhancing pedestrian activity through these building design and streetscape enhancements. Therefore, the Project would be substantially consistent with Walkability Checklist guidelines related to building frontage.

(vii) *Building Signage and Lighting*

While building plans are still in the preliminary phase, the Project would be designed to generally support the walkability guidelines regarding building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and “place making”. Pedestrian wayfinding signage would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors, while Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes.

The signage program for the Project would comply with the LAMC, and any applicable approval processes for signage set forth therein. The character, placement, size, and proportions of the Project’s proposed signage would be consistent with comparable projects in the area. It is anticipated that the majority of signage would be located so as to be visible along on the Mateo Street and Imperial Street frontages.

Project lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties. Therefore, the Project would be consistent with Walkability Checklist guidelines related to building signage and lighting.

Therefore, as the Project or the Flexibility Option would not conflict with the City’s Walkability Checklist guidelines and impacts would be less than significant.

(k) *Industrial Land Use Policies*

While the guidance provided by the ILUP is not mandatory and is not a part of the LAMC, incorporating the recommendations to the maximum extent feasible would create a higher quality of urban form for the Project. The Project would be comprised of a live/work development consisting of up to 185 live/work units with approximately 23,380 square feet of commercial uses, including general commercial, restaurant, retail, office, and art production-related uses. Additionally, the Project would require rezoning of the existing industrial M3 zoning to a C2 commercial zoning, thus conflicting with the ILUP Memo’s general staff direction to preserve industrially zoned land. However, the Project would include some of the community benefits, most notably the open space amenities, recommended in the ILUP Memo for approving the conversion of industrially zoned land in designated IMU Districts. In addition, the Project would incorporate ILUP guidelines for providing community benefits through jobs-producing space and affordable and artist-

oriented housing (live/work space), including 20 live/work units deed-restricted for Very Low Income households.²⁴

The Community Plan describes the AIR District as “primarily made up of old warehouses now converted to artists’ lofts and studios” and that the Community Plan “encourages the continued and expanded development of a thriving artists-in-residence community in the plan and proposed redevelopment areas.”²⁵ In December 2007 the City of Los Angeles Department of City Planning and the Community Redevelopment Agency prepared the *Los Angeles’ Industrial Land: Sustaining a Dynamic City Economy*, which clarifies the AIR District is the only district that the City encourages residential development in the industrial area. Furthermore, it is important to note that although the Project Site is currently zoned industrial, as described above, the existing uses of the site are not prime industrial uses that generate a significant number of quality industrial jobs. Specifically, while the ILUP survey categorized the Project Site as currently containing “light industry” uses, existing uses are a combination of industrial and office. The Project would include approximately 23,830 square feet of commercial uses (general commercial, restaurant, retail, office and art production-related uses), which would generate 73 new jobs, including management positions, in addition to the creative production work opportunities provided by the live/work units. As such, the Project would be consistent with the purpose of the ILUP to implement Goals 7A and 7B of the Framework Element for industrial growth that provides job opportunities for the City’s residents and maintain the City’s fiscal viability, including the City’s intent to: protect industrial zoned land; retain and expand existing businesses (by bringing new customers to existing businesses); attract new uses that provide job opportunities for the City’s residents; and maintain a healthy jobs/household ratio that supports the General Fund and its capacity to pay for essential services and programs for the City’s existing and future population. Therefore, without even considering the up to 185 live/work units proposed within the Project, the Project would be estimated to result in 73 jobs (see **Table IV.I-3** in **Section IV.I, Population and Housing**, of this Draft EIR).

The City is striving to maintain space for employment in areas that are planned for industrial uses and to allow the creation of a unique housing type, allowing the introduction of unique residential uses while ensuring the appropriate balance of space for employment. This on-going transformation of the Arts District in downtown began in the 1970s, when artists many of whom were priced out of the ever-increasing Venice and Hollywood areas moved into vacant warehouses perfect for massive live/work studios at

²⁴ City of Los Angeles Department of Planning and Community Redevelopment Agency, *Memorandum for Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses*, January 3, 2008.

²⁵ City of Los Angeles Central City North Community Plan, December 2000.

rock-bottom prices, in an area that was zoned for industrial uses. In 1981 the City of Los Angeles implemented the AIR program, which legalized the residential use of formerly industrial buildings for artists and permitted the limited conversion of industrial buildings into live/work residential buildings.²⁶ This began to change the character of the Arts District with the growing residential population. The ILUP study underscored the need to retain industrial land for job-producing uses and provided policy recommendations to be implemented by the General Plan, Community Plans, and other comprehensive planning efforts.

The Project would include a mix of live/work units with general commercial, restaurant, retail, office, and art production-related uses. The Project would contribute to ongoing efforts to bring investment and neighborhood amenities to the Arts District area and has been designed to be pedestrian oriented with ground floor commercial uses fronting both street frontages. Furthermore, residents and visitors would have access to the various uses in the immediate area within convenient walking distance and/or accessible by bicycle. The Project would have the potential to improve the quality of life for all those who live, work, and visit the immediate and surrounding area by reducing the necessity for automobiles and improving the environment through better pedestrian orientation, bicycle and vehicular accessibility, as well as enhancement of desirable neighborhood character.

The Project would replace an industrial warehouse building and surface parking lot with a mixed-use live/work development that provides opportunities for artists to live in close proximity to work and potentially within the same space. In addition to expanding available housing opportunities, the Project has been designed to be pedestrian oriented with ground floor commercial uses fronting both street frontages. The commercial uses would consist of several establishments, each with its own entrance directly from Mateo and/or Imperial Streets or paseo.

The proposed General Plan Amendment from Heavy Manufacturing to the Regional Center Commercial land use designation, and corresponding Zone Change/Height District Change from M3-1-RIO to C2-2-RIO, would re-designate the subject property for a live/work mixed-use development, allowing it to be used for the purpose of providing approximately 185 units of live/work and commercial uses while still contributing to the industrial and artistic character of the area. With approval, the Project would contribute to the available housing stock within the City.

The Project is also beneficial in terms of convenience in that it would provide opportunities for people to live, work, and visit this area of downtown Los Angeles, with live/work units, general commercial, restaurant, retail, office and art production-related uses, and open

²⁶ *Arts District Los Angeles website.*

space at a site adjacent to several Metro, LADOT and other regional transit bus lines, thus providing opportunities for residents, employees, visitors, and nearby local residents to use transit and reduced vehicle trips and VMTs. In addition, locating live/work development close to transit and incorporating office and commercial shopping areas with retail services and restaurants encourages pedestrian activity, and provides an incentive for residents not to use their cars for commuting errands, dining out, etc., thereby reducing vehicle trips. Furthermore, the Project has been designed to create a pedestrian-oriented streetscape, including a publicly accessible pedestrian paseo that would provide connectivity between the building's frontages. The paseo would be accessible to the public providing access to ground-floor commercial uses and open space dining areas and terrace on the second level. The paseo would provide a landscaped connection through the Property from Mateo Street to Imperial Street. Overall, the Project would incorporate ILUP guidelines by placing affordable housing within an area accessible to several modes of transportation and improving walkability in the immediate vicinity of the Project Site by replacing a warehouse use and surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options.

As discussed previously, the ILUP Clarification Memo states that the ILUP Memo was not intended to predetermine land use decisions or presuppose any future land use changes, nor are the community benefits requirements that can be imposed by the Planning Department. **As the AIR District is the only district that the City encourages residential development in the industrial area the Project or the Flexibility Option would have a less than significant impact with respect to the City's ILUP policies regarding the use and preservation of industrial land use.**

(I) Citywide Design Guidelines

As previously stated, the Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character while promoting design excellence and creative infill development solutions. The Citywide Design Guidelines are a statement of the City's vision for the future of Los Angeles, providing guidance for new development and encouraging projects to complement existing urban form in order to enhance the built environment in Los Angeles. They are intended to embrace the variety of urban forms that exist within Los Angeles, from the most urban, concentrated centers to the suburban neighborhoods.

The purpose of the guidelines are to:

- Foster design innovation and creativity;
- Promote design excellence;
- Communicate the City's design expectations;

- Facilitate fair and consistent application of design objectives;
- Protect investment throughout the City by encouraging consistently high-quality development;
- Encourage development of projects appropriate to the context of the City's climate and urban environment;
- Facilitate safe, functional, and attractive development; and
- Foster a sense of community and encourage pride and stewardship.

The Project's consistency with applicable objectives in the Citywide Design Guidelines is presented in **Table IV.G-9, Consistency with Applicable Objectives of the Citywide Design Guidelines**, found in **Appendix H** of this Draft EIR. The Project Site is an underutilized site occupied with an industrial warehouse building and surface parking lot. The new development would be a mixed-use live/work development that provides opportunities for artists to live in close proximity to work and potentially within the same space. The Project's proposed design is a contemporary architectural style and would feature sculptural elements, including a custom-shaped building that emerges from a single-story base, oriented west toward the Industrial Street/Mateo Street T-intersection, connecting to the rest of the Project from the third floor and above. The corner building would consist of metal and glass. The remainder of the Mateo Street facade above ground level would consist of masonry and a regular grid of large windows. The Imperial Street facade would consist of the same glass, metal, and masonry as well as channel glass surrounding the ground-floor entrance to the subterranean parking structure. The materials palette is intended to complement the decorative brick of surrounding buildings and the texture of corrugated metal. The Project has been designed to create a pedestrian-oriented streetscape by providing a variety of commercial uses along Mateo Street and Imperial Street. In addition, the publicly accessible pedestrian paseo would provide connectivity between the building's frontages and the two public streets. The Project would include approximately 15,320 square feet of useable open space (and approximately 14,160 square feet under the Flexibility Option), of which approximately 9,290 square feet would be outdoor common space, including the pedestrian paseo. Soft lighting will wash the interior walls to create the effect and all light fixtures would be shielded to avoid light or glare spillover. New Project signage would be used for building identification, wayfinding, and security. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. **Therefore, the Project or the Flexibility Option would not conflict with the Citywide Design Guidelines and impacts would be less than significant.**

(2) Mitigation Measures

The Project and the Flexibility Option's impact with regard to conflicts with applicable land use plans would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to conflicts with applicable land use plans would be less than significant without mitigation.

4. Cumulative Impacts

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

a) Impact Analysis

As indicated in **Section III, Environmental Setting**, of this Draft EIR, there are 20 Related Projects that are planned or are under construction in the Draft EIR study area. The Related Projects generally consist of infill development and redevelopment of existing uses and the cumulative project uses include residential, commercial and office uses. Of the 20 Related Projects, there are 7 projects (Related Project Nos. 1, 2, 7, 10, 15-17) within close proximity (within a quarter of a mile (0.25-mile) radius) of the Project Site. These Related Projects consist of hotel, and mixed uses comprised of residential, retail, office, and restaurant uses. As with the Project, the Related Projects would be required to comply with relevant land use policies and regulations. In addition, as discussed in **Section VII (Impacts Not Found to be Significant)**, and in the Initial Study (**Appendix A.2**), the Project would not physically divide an established community, and the Project would generally be consistent with applicable land use plans and zoning standards with approval of the requested approvals, and thus, the Project would not incrementally contribute to cumulative conflicts or inconsistencies with respect to land use plans and zoning standards. Further, the Project would be functionally compatible to land uses currently in the Project vicinity. The Project would be compatible with the proposed nearby Related Projects. Given the location of the Project and the Related Projects, such developments are not expected to fundamentally alter the existing land use relationships in the immediate area, but rather would concentrate development on particular sites. This concentration of a mix of land uses in the downtown urban core and in proximity to walkable spaces and transit, within areas of existing infrastructure and services, would

further the goals of several land use plans for smart growth, resulting in a land use pattern that would not conflict with policies for reducing air pollution, greenhouse gas emissions, and vehicle miles travelled. In addition, as discussed above, as the Project would not conflict with either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and relevant environmental policies. **Therefore, cumulative impacts of the Project and Flexibility Option with regard to land use consistency would be less than significant and would not be cumulatively considerable.**

b) Mitigation Measures

Cumulative impacts related to land use and planning for both the Project and the Flexibility Option would be less than significant; no mitigation measures would be required.

c) Level of Significance After Mitigation

Cumulative impacts related to land use from the Project and Flexibility Option would be less than significant without mitigation.