

IV. Environmental Impact Analysis

F. Land Use

1. Introduction

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

2. Environmental Setting

a. Regulatory Framework

(1) Local

Several plans, policies, and regulatory documents guide development within the City of Los Angeles (City), including the City of Los Angeles General Plan (General Plan) and the Los Angeles Municipal Code (LAMC), which governs land use through specific development and design standards and building and safety codes. The Central City North Community Plan (Community Plan) is the local land use policy plan for the Project Site and Community Plan area. The Project Site is also located within the Central Industrial Redevelopment Project area and the River Improvement Overlay District. Applicable plans and associated regulatory documents/requirements are described below.

(a) City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a General Plan, which is a comprehensive long-term document that provides principles, policies, and objectives to guide future development. The City's General Plan is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development. The General Plan sets forth goals, objectives, and programs to guide land use policies and to meet the existing and future needs of the community. The General Plan consists of a series of documents which includes the seven state-mandated elements: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, and Public Facilities and Services, as well as the City of Los Angeles General Plan Framework Element (Framework Element). The Land Use Element is comprised of 35 local area plans known as

Community Plans that guide land use at the local level. The Project Site is located within the boundaries of the Central City North Community Plan area.

(i) Los Angeles General Plan Framework Element

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

(1) Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are described in terms of intensity/density ranges, development heights, and lists of typical land uses: Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. These land use categories are intended to serve as guidelines for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City. The Project Site is not identified as being located within any of these categories.

(2) Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

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

(3) Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines “urban form” as the City’s general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. “Neighborhood design” is defined as the physical character of neighborhoods and communities. The Urban Form and Neighborhood Design Chapter of the Framework Element encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

(4) Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City’s residents; and guide amendments to the General Plan Open Space Element and Conservation Element.

(5) Economic Development Chapter

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

(6) Transportation Chapter

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. The goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. The City Council initially adopted Mobility Plan 2035 in August 2015 as an update to the Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January

2016 and again in September 2016.¹ Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035. Refer to Subsection 2.a.(1)(a)(ii), below for a discussion of Mobility Plan 2035.

(7) Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, 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 need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project is included in Table 1 of Appendix G of this Draft EIR along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy. In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed below for informational purposes. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

(ii) Mobility Plan 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways,

¹ Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.

defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context.” Mobility Plan 2035 includes the following five main goals that define the City’s high-level mobility priorities:²

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

Each of these goals contains objectives and policies to support the achievement of those goals. The Project’s consistency with applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project is included in Table 2 of Appendix G of this Draft EIR along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy.

(iii) Los Angeles General Plan Housing Element

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

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

² City of Los Angeles Department of City Planning, *Mobility Plan 2035: An element of the General Plan, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.*

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

(iv) Los Angeles General Plan Conservation Element

The General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. Section 5 of the Conservation Element of the General Plan recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element of the General Plan established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.³ Section 15 of the Conservation Element establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. As stated therein, it is the City's policy to encourage development that would protect significant landforms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources. The Project's consistency with applicable policies in the Conservation Element is analyzed below in Subsection 3.c.(2)(a)(i) on page IV.F-24.

(v) Central City North Community Plan

The Central City North Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the General Plan Framework Element. Last updated in 2000, the Community Plan was developed in the context of promoting a vision for the Central City North Community Plan area as a community that: preserves and enhances the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing; improves the function, design, and economic vitality of the commercial corridors; preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance;

³ *City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.*

maximizes the development opportunities of future transit systems while minimizing any adverse impacts; and plans the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Central City North Community Plan area. As shown in Figure IV.F-1 on page IV.F-8, the current land use designation for the Project Site, pursuant to the Community Plan, is Heavy Industrial. The Project's consistency with applicable goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect in the Community Plan is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Community Plan applicable to the Project is included in Table 4 of Appendix G of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal, objective, or policy. In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed below for informational purposes. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

The City of Los Angeles Department of City Planning is currently updating the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to create and implement a future vision for Downtown Los Angeles.⁴ Specifically, the following core principles represent the long-term priorities for the DTLA 2040 Plan:⁵

- Accommodate anticipated growth through 2040 in an inclusive, equitable, sustainable, and healthy manner
- Support and sustain Downtown's ongoing revitalization
- Reinforce Downtown's jobs orientation
- Grow and support the residential base
- Promote a transit, bicycle, and pedestrian friendly environment
- Strengthen neighborhood character

⁴ City of Los Angeles, *Downtown Los Angeles Community Plan Update*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed March 30, 2020.

⁵ City of Los Angeles, *DTLA 2040, June 2019 Draft*.



Figure IV.F-1
Land Use Designations for the Project Site and Vicinity

- Create linkages between districts
- Create a World-Class Streets and Public Realm

As currently proposed by the draft DTLA 2040 Plan, the Project Site will be designated as Hybrid Industrial, which will allow a maximum floor area ratio (FAR) of between 3:1 to 6:1, with general uses that include creative office, live/work, manufacturing, and production activity.⁶ The DTLA 2040 Plan proposes the following description of the Hybrid Industrial area:⁷

Hybrid Industrial places have a distinct urban form characterized by medium and low scale development with an industrial legacy. High-quality new construction and repurposed structures collectively promote a resourceful approach to urban development that can evolve over time. These areas preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically-integrated businesses, with careful introduction of live-work uses. The industrial legacy is reflected with a network of irregular streets, punctuated by occasional passageways. The street, block, and building patterns have evolved into an inviting environment for pedestrians and cyclists.

The DTLA 2040 Plan process began in 2014, and a public scoping meeting was held in February 2017 to collect comments from agencies and the public. A Draft EIR regarding the DTLA 2040 Plan is anticipated to be released in the coming months.⁸

(b) Los Angeles Municipal Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Figure IV.F-2 on page IV.F-10, the Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay). The M3 designation indicates that the Project is located in a Heavy Industrial zone, which permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses. The “1” indicates that the Project Site is located in Height District 1, which does not specify a building height

⁶ City of Los Angeles, DTLA 2040, June 2019 Draft.

⁷ City of Los Angeles, DTLA 2040, June 2019 Draft.

⁸ City of Los Angeles, Downtown Los Angeles Community Plan Update, Timeline, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#timeline>, accessed March 30, 2020.



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

limit, but limits the Floor Area Ratio (FAR) to 1.5 to 1. The RIO designation indicates that the Project Site is located within the River Improvement Overlay (RIO) District.

Pursuant to LAMC Section 12.21.A.4(x)(3), the Project is eligible for a reduced commercial parking requirement of 2 parking spaces per 1,000 square feet of commercial floor area because the Project Site is within the former East Los Angeles State Enterprise Zone.^{9,10} On July 11, 2013, Governor Edmund G. “Jerry” Brown Jr. signed legislation that resulted in the repeal of the Enterprise Zone Act and the dissolution of Enterprise Zones. However, the City Council adopted an action on December 18, 2013, that approved the continuation of the reduced parking provision for former Enterprise Zone areas. Refer to Section IV.I, Transportation, of this Draft EIR for a detailed discussion of parking requirements. The Project’s consistency with applicable LAMC requirements is presented below in Subsection 3.c.(2)(a)(ii) on page IV.F-24.

(c) Redevelopment Plan for the Central Industrial Redevelopment Project

The Redevelopment Plan for the Central Industrial Redevelopment Project (Redevelopment Plan) was adopted by the City Council on November 15, 2002, pursuant to Ordinance No. 174,978. The Redevelopment Plan covers approximately 738 acres and is generally bounded by 3rd Street to the north, the Los Angeles River to the east, Washington Boulevard and the Santa Monica Freeway (I-10) to the south, and Stanford Avenue and San Pedro Street to the west.¹¹ This area is a predominantly industrial area with a commercial presence, and a residential community comprised of an emerging artist residential loft district, and single room occupancy hotels serving residents of Skid Row.¹² The purpose of the Redevelopment Plan is to revitalize the area through new commercial, industrial, and residential development and the rehabilitation/reuse of existing development, to maintain and expand residential neighborhoods and preserve/reuse cultural resources, and to eliminate various conditions of blight that have been identified.¹³

⁹ California Department of Housing and Community Development, *Enterprise Zones*, www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml, accessed March 30, 2020.

¹⁰ City of Los Angeles, Planning Department: Systems & GIS Division, *Zone Area County/City Portions & Major Streets Map—Los Angeles—East Los Angeles Enterprise Zone*, September 2007.

¹¹ CRA/LA, *Plans & Work Program, Fact Sheet*, www.crala.org/internet-site/Projects/Central_Industrial/workprogram.cfm, accessed March 30, 2020.

¹² CRA/LA, *About the Project Area*, www.crala.org/internet-site/Projects/Central_Industrial/about.cfm, accessed March 30, 2020.

¹³ Terry A. Hayes Associates LLC, *Central Industrial Redevelopment Project Draft Environmental Impact Report*, April 2002.

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

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

The Project's consistency with the Redevelopment Plan is discussed in the impact analysis below in Subsection 3.c.(2)(a)(iii) on page IV.F-26. A detailed list of the goals of the Redevelopment Plan applicable to the Project Site is included in Table 5 of Appendix G of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal.

(d) River Improvement Overlay District

In connection with the Los Angeles River Revitalization Master Plan, which focuses on the creation of parks, paths and open spaces in the vicinity of the Los Angeles River, the RIO District proposes the establishment of a distinct sustainable environment in the surrounding neighborhoods to promote concepts developed in the Los Angeles River's Master Plan. The RIO District establishes landscaping, design criteria, and administrative review procedures for projects within the RIO District. Pursuant to Ordinance No. 183,145, the purposes of RIO Districts include: 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 support local 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. The Project's consistency with the RIO District is discussed in the impact analysis below in Subsection 3.c.(2)(a)(iv) on page IV.F-27.

(e) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning (DCP) staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines are intended to "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Project's consistency with the guidelines adopted for the purpose of avoiding or mitigating an environmental effect is discussed below in Subsection 3.c.(2)(a)(v) on page IV.F-27.

(f) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. DCP staff use the Walkability Checklist in evaluating a project's conformance with the policies and objectives of the General Plan and the local Community Plan. The Walkability Checklist is also intended to be used by architects, engineers, and all community members to enhance pedestrian movement, access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.¹⁴

¹⁴ City of Los Angeles Department of City Planning, *Walkability Checklist Guidance for Entitlement Review*, November 2008.

In the field of urban design, walkability is the measure of the overall walking conditions in an area. Different factors have been identified with regard to enhancing walkability in the private versus public realms. Specific factors influencing walkability within the private realm (private areas of projects) include building orientation, building frontages, signage and lighting, on-site landscaping, and off-street parking and driveways. Contributors influencing walkability within the public realm include sidewalks, crosswalks/ street crossings, on-street parking, and utilities. Street connectivity, access to transit, aesthetics, landscaping, and street furniture are additional components that are discussed in the Walkability Checklist as they also influence the pedestrian experience.

As with the design principles included in the Framework Element's Urban Form and Neighborhood Design Chapter, the guidelines provided in the Walkability Checklist are not appropriate for every project. The primary goal is to consider the applicable guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm. The Project's consistency with the Walkability Checklist is presented in the impact analysis below in Subsection 3.c.(2)(a)(vi) on page IV.F-30.

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

The City has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), Los Angeles Fire Department Strategic Plan, Los Angeles Department of Water and Power 2015 Urban Water Management Plan (UWMP), the City of Los Angeles Sustainable City pLan, *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan"), and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR, and in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR.

(h) Industrial Policy Initiatives

In or about 2007, the City Planning Department and Community Redevelopment Agency formulated an Industrial Land Use Policy (ILUP) that was intended to preserve certain industrially zoned land in the City for industrial use. The City Planning Commission approved the ILUP, but it was never formally presented to the City Council for consideration or adoption. In or about 2015, the City determined that the ILUP was out of date and no longer reflected the City's land use goals and objectives for the Arts District area, especially in light of the City's critical need for new housing. Moreover, the ILUP was based on now-outdated data (over a decade old) that does not reflect the evolution of the area that has resulted in numerous live/work and commercial developments. Therefore, the City embarked on a new policy initiative that culminated in the City Council's adoption of the Hybrid Industrial (HI) Ordinance in 2016, which provided a new zoning tool to allow

residential uses in areas that are predominantly industrially zoned. The HI Ordinance was successfully challenged on CEQA grounds, and was rescinded. In the absence of this more current zoning tool, the City is considering zone changes and General Plan Amendments from industrial designations on a case-by-case basis, as it has historically done.

In addition, since 2008, a number of other planning and policy studies have been undertaken involving industrial land policy. For example, as noted above, the City is currently preparing the DTLA 2040 Plan which would include the Project Site to support and sustain the ongoing revitalization of the area. The DTLA 2040 Plan proposes to modify the land use designations for the downtown area. As noted above, the Project Site would be designated as Hybrid Industrial under the DTLA 2040 Plan, which are areas to “preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically-integrated businesses, with careful introduction of live-work uses.”¹⁵

(2) Regional

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

(a) Southern California Association of Governments’ 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

SCAG’s 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2016–2040 RTP/SCS places a greater emphasis on sustainability and

¹⁵ City of Los Angeles, DTLA 2040, June 2019 Draft.

integrated planning compared to previous versions of the Regional Transportation Plan, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. As part of this new approach, the 2016–2040 RTP/SCS establishes commitments to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing and environmental planning in order to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS). The 2016–2040 RTP/SCS also establishes High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.¹⁶ Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within an HQTA as designated in the 2016–2040 RTP/SCS.^{17,18}

The Project's consistency with the applicable goals of the 2016–2040 RTP/SCS is discussed in the impact analysis below. A detailed list of the goals of the 2016–2040 RTP/SCS applicable to the Project is included in Table 6 of Appendix G of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal.

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

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, SCAQMD has prepared an AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section IV.A, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the AQMP.

¹⁶ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, p. 189.

¹⁷ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016.

¹⁸ Los Angeles County Metropolitan Transportation Authority, High Quality Transit Areas—Southeast Quadrant map.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the northern portion of the Project Site is currently developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories and used for 6,983 square feet of office, 25,739 square feet of retail, 2,109 square of warehouse, and 10 live-work units comprised of 28,699 square feet. The Project Site also includes two sheds and surface parking areas generally located on the southern half of the Project Site. Vehicular access to the site access is currently available at driveways along Violet Street, East 7th Place, and a public alley that abuts the Project Site to the west. The Project Site is relatively flat with limited ornamental landscaping.

As previously discussed and as shown in Figure IV.F-1 on page IV.F-8, the Project Site is designated as Heavy Industrial by the Community Plan. As shown in Figure IV.F-2 on page IV.F-10, the entire Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay). The Project Site is also located within a designated HQTa and within a Transit Priority Area (TPA), as defined in the City's Zoning Information File No. 2452.

(2) Surrounding Uses

The Project Site is located at the southern edge of the Arts District and the surrounding area is developed with a mix of light industrial, commercial, and residential uses. Nearby uses include Blu Leaf Clothing store, restaurants (Bestia, Sprout LA), the Cartifact corporate offices, and the 2121 Lofts to the north; a recycling center (Excel Metals) and a distribution facility (Manuel's Produce) to the south; Stumptown Coffee Roasters, Ruffworld Recording Studio, Alphacast Foundry, and other office uses to the west; and rail lines and the Los Angeles River to the east. Other uses in the Project vicinity include creative loft spaces (Toy Factory Lofts and the Biscuit Company Lofts) located north of the Project Site along Mateo Street, the Ford Factory building across South Santa Fe Avenue, and the Hyperloop One headquarters along Bay Street.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community.

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

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

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

b. Methodology

The analysis of potential land use impacts considers the Project's consistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

(1) Physically Divide a Community

The intent of the analysis is to determine whether existing communities or land uses would be disrupted, divided, or isolated by the Project, with consideration given to the duration of any disruptions. The analysis is based on aerial photography, land use maps, and field surveys in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form based on a comparison of existing land use relationships in the vicinity of Project Site under existing conditions, at the time the Notice of Preparation was issued, to the conditions that would occur with Project implementation.

(2) Conflict with Applicable Goals, Objectives, and Policies Adopted for the Purpose of Avoiding or Mitigating an Environmental Impact

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were

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

“...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.”

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

c. Project Design Features

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

The Project Site is located at the southern edge of the Arts District, a highly urbanized area that has experienced substantial residential and commercial growth over the past decade. This area is currently characterized by a mixture of low- and mid-rise industrial and warehouse buildings that have been restored and converted to commercial uses and live/work units. The Project does not propose a freeway or other large infrastructure that would divide a community. All proposed development would occur within the boundaries of the Project Site, a private plot of land which does not intersect the public

right of way, as it currently exists. Therefore, the Project would not physically divide an established community.

As discussed above, the Project would retain four existing buildings and replace the remaining buildings with a new infill mixed-use project containing new live/work units, community room residents could use for art production, and office and retail/restaurant uses.

The Project would not have a long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of the uses. **As such, the Project would not physically divide, disrupt, or isolate an established community, and Project impacts with respect to Threshold (a) would be less than significant.**

(2) Mitigation Measures

Impacts would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

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

(1) Impact Analysis

(a) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Housing Element, and Conservation Element; the Community Plan; the LAMC; the Redevelopment Plan; the River Improvement Overlay District; Citywide Design Guidelines; and the Walkability Checklist that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. It also includes, for informational purposes, a discussion of the Project's consistency with certain goals, objectives, and policies of the General Plan Framework Element and Community Plan pertaining to industrial preservation and conversion.

(i) Los Angeles General Plan

(1) Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 1 of Appendix G of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

The Project would support and would be consistent with the applicable goals, objectives, and policies of the Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would develop a diversity of uses on the Project Site to support the housing, employment, and commercial needs of existing and future residents, businesses, and visitors of the Arts District. Development of the Project would require the re-designation of an industrial site for a mixed-use development that would be consistent and compatible with other surrounding uses in the Arts District. In addition, the building design and heights would be generally consistent with the scale and character of the existing and proposed developments in the Arts District.

The Project Site is in an area well-served by public transit, including multiple local and regional Metro bus lines, and the Greyhound Bus Terminal, and has adequate public services and utility infrastructure to service the Project. The Project would enhance pedestrian activity by siting retail and restaurant uses on the ground level of the proposed new buildings, installing new landscaping and streetscape improvements around the Project Site, and providing an extensive paseo system that would connect to East 7th Place and Violet Street and include a variety of pedestrian amenities. The Project would also provide bicycle parking spaces on the Project Site. Thus, the Project would provide opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies in the Land Use Chapter of Framework Element.

(b) Housing Chapter

The Project would support the objectives and policies of the Housing Chapter by developing up to 347 new live/work units on the Project Site in a designated HQTa and TPA. There are multiple local and regional bus lines that operate in the vicinity of the Project Site. In addition, the Greyhound Bus Terminal, which provides inter-city bus

service to various locations outside of the Los Angeles, is located approximately 0.3 mile west of the Project Site on 7th Street. The Project's location near transit will serve to reduce VMT. Therefore, the Project would not conflict with the applicable objectives and policies in the Housing Chapter of the Framework Element.

(c) Open Space and Conservation Chapter

The Project would provide approximately 71,719 square feet of open space and recreational amenities on the Project Site for residents and visitors. On the ground floor, the Project would provide a publicly accessible pedestrian paseo system with art exhibition spaces, landscaped planters, and various gathering and seating areas. Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9 of the residential tower and on Level 8 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8 of the office building. Therefore, the Project would not conflict with the applicable objectives and policies in the Open Space and Conservation Chapter of the Framework Element.

(d) Economic Development Chapter

The Economic Development Chapter contains economic development policies that were not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would develop new commercial and residential uses in an area that would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Thus, the Project would provide residents with a range of housing opportunities, access to local services, and access to transportation, which would allow future residents to both live and work in the Project vicinity. Moreover, the Project Site currently contains only a small amount of warehouse uses (2,109 square feet), all of which would be retained. Therefore, the Project would not displace and existing industrial uses. In addition, the Project would meet the criteria to change the site's industrial land use designation. As such, the Project would not conflict with the applicable objectives and policies in the Economic Development Chapter of the Framework Element.

(e) Infrastructure and Public Services Chapter

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would support the City's objective for reducing stormwater runoff and protecting water quality by implementing a SWPPP during construction that would include BMPs to minimize the discharge of pollutants in stormwater runoff and managing stormwater runoff during operation in accordance with the City's LID Ordinance requirements. In addition, as discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the

Project, as well as existing and planned water demands of its future service area. Furthermore, the Project would incorporate appropriate lighting that would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Therefore, the Project would not conflict with the applicable goals, objectives, and policies in the Infrastructure and Public Services Chapter of the Framework Element.

(f) Conclusion

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

(2) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix G of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect.

The Project would support the City's policy to provide for safe passage of all modes of travel during construction by implementing a construction traffic management plan that incorporates safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimizes the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduces congestion to public streets and highways. The Project would also support the City's policy to ensure high quality pedestrian access and to provide a safe and comfortable walking environment by installing landscaping and streetscape improvements and providing an extensive pedestrian paseo system on the Project Site with a variety of pedestrian amenities. In addition, the Project would promote the City's policy to recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle facilities. Furthermore, given the Project's proximity to multiple public transit options, the Project would provide all residents, employees, and visitors convenient access to transit services. These measures would serve to reduce VMT. **Therefore, the Project would not conflict with the applicable policies in Mobility Plan 2035.**

(3) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is detailed in Table 3 of Appendix G of this Draft EIR. Specifically, as discussed therein, the Project would provide up to 347 market rate and affordable units in close proximity to commercial uses and transit, which would serve to

reduce VMT. The Project would also promote the construction of sustainable buildings that would incorporate design features to reduce energy and water usage, and reduce solid waste. **Therefore, the Project would not conflict with the applicable policies and objectives in the Los Angeles General Plan Housing Element.**

(4) Los Angeles General Plan Conservation Element

As noted above, the City's Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. As discussed in the Initial Study, included as Appendix A, and in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would have no impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, Building C was previously identified by SurveyLA as a historic resource, but as evaluated therein, the Project would not result in direct impacts to this historic resource or indirect impacts to any nearby historic resources. The Project would comply with regulatory requirements to protect archaeological resources and would implement mitigation to reduce potential impacts to paleontological resources. Therefore, the Project would not conflict with Section 5 of the Conservation Element. Furthermore, as analyzed in Section VI, Other CEQA Considerations, the Project would not obstruct existing public views of any scenic vistas or visual resources. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. **As such, the Project would not conflict with the applicable policies and objectives Conservation Element.**

(5) Central City North Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Community Plan is discussed in detail on Table 4 of Appendix G of this Draft EIR. Specifically, the Project would not conflict with Objective 1-2 which calls for locating new housing in a manner that reduces vehicular trips and makes it accessible to services and facilities by constructing 347 new live/work units within an HQTAs and TPA. The Project would also provide additional opportunities for new commercial development and services by developing approximately 187,374 square feet of new office space and 21,858 square feet of new retail/restaurant floor area.

The Project design and improvements would enhance pedestrian activity and promote walkability consistent with Policies 2-2.2 and 2-2.3. The Project would not conflict with Goal 12 of the Community Plan which encourages alternative modes of transportation because of the Project Site's proximity to a various of public transit options and to nearby commercial and offices uses, and the provision of bicycle parking spaces on site would also promote alternative modes of transportation that would reduce vehicle trips.

Furthermore, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips consistent with Policy 12-1.3. **Based on the analysis above, the Project would not conflict with the goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.**

(ii) Los Angeles Municipal Code

As discussed above and shown in Figure IV.F-2 on page IV.F-10, the Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay). The M3 designation permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses, but does not allow for residential uses. The “1” indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but limits the Floor Area Ratio (FAR) to 1.5 to 1. The RIO designation indicates that the Project Site is located within the River Improvement Overlay (RIO) District.

The Project would develop new live-work units, and new office and retail/restaurant uses on the Project Site. These new uses would be located in a 36-story residential tower with a maximum height of 425 feet and an eight-story office building with a maximum height of 131 feet. In addition, five existing buildings containing office, retail, restaurant, and warehouse uses, as well as live-work units would be retained. Upon completion, up to 569,448 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1.

Development of the Project would require a Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO and a corresponding General Plan Amendment to the Community Plan to change the land use designation from Heavy Industrial to Regional Center Commercial. The proposed C2-2-RIO zone would permit construction of the proposed live-work units. The C2 zone in conjunction with the proposed Regional Center Commercial land use designation permits 1 dwelling unit per 200 square feet of lot area for mixed-use developments such as the Project. The Project Site is 94,946 square feet after street dedications, which would permit a maximum of 474 dwelling units. The Project would construct up to 347 new live/work units and retain 6 existing units, which would result in a total unit count of 353 dwelling units. The total number of units would be below the maximum number of units permitted. The proposed C2-2-RIO zone would permit a 6:1 FAR, which equates to a total of 569,676 square feet of floor area based on 94,946 square feet of lot area after street dedications. The 569,448 square feet of floor area proposed by the Project would be below the maximum floor area permitted by the 6:1 FAR restriction.

Based on LAMC requirements for the proposed land uses and existing uses to remain, the Project would be required to provide 783 vehicle parking spaces and

257 bicycle parking spaces (47 short-term and 210 long term).¹⁹ The Project would provide 828 vehicle parking spaces and 257 bicycle parking spaces, which would exceed LAMC requirements. Vehicular parking spaces would be located within six subterranean parking levels. Short-term bicycle parking spaces would be provided on the ground level while long-term bicycle parking spaces would be provided within six subterranean parking levels. The Project also would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

The Project would also seek the approval of a Vesting Tentative Tract Map for the merger and re-subdivision of the Project Site into three lots and for residential and commercial condominiums; a Vesting Conditional Use Permit to permit floor area averaging and residential density transfer within a unified development; a Master Conditional Use Permit for the on-site sale of a full-line of alcoholic beverages within the Project's commercial areas; and an affordable housing development incentive to permit zero-foot side yards in lieu of 16 feet otherwise required for the residential levels along the eastern property line. The Project would set aside a minimum of 5 percent of the total units for Extremely Low-Income households and 11 percent of the total units for Very Low Income households to comply with LAMC 11.5.11.

With approval of the requested discretionary actions, the Project would be consistent with applicable LAMC requirements.

(iii) Redevelopment Plan for the Central Industrial Redevelopment Project

The Project Site is designated for Light Industrial land uses according to Exhibit No. 1, Redevelopment Plan Map, in the Redevelopment Plan, and is subject to a base 3:1 FAR limit according to Section 512.1 of the Redevelopment Plan. However, Section 502 of the Redevelopment Plan clarifies that “the land uses permitted in the Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time. In the event the General Plan, the applicable Community Plan, or any applicable City zoning ordinance is amended or supplemented with regard to any land use in the Project Area, the land use provisions of this Plan, including without limitation, all Exhibits attached hereto, shall be automatically modified accordingly without the need for any formal plan amendment process.” Thus, with approval of the requested General Plan Amendment and Vesting Zone and Height District Change, the Project Site would be

¹⁹ The Project is requesting to utilize LAMC residential parking standards in lieu of the residential condominium parking standards of the Deputy Advisory Agency's parking policy.

re-designated for Regional Center Commercial land uses and zoned M3-1-RIO and would be subject to the permitted uses, height, and densities of the Regional Center Commercial and C2-2-RIO designations. Nonetheless, the Project is subject to review by CRA/LA for conformance with the Redevelopment Plan goals. Table 5 in Appendix G of this Draft EIR evaluates the Project's consistency with the relevant goals of the Redevelopment Plan. **Therefore, the Project would not conflict with the applicable objectives of the Redevelopment Plan for the Central Industrial Redevelopment Project.**

(iv) River Improvement Overlay District

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establishes best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies specifically address river-adjacent development. Although the Project is located within the boundaries of the RIO District, the Project Site is separated from the Los Angeles River by existing rail lines and is not immediately adjacent to the River. Nevertheless, the Project would further the relevant objectives, including employing high quality, attractive and distinguishable architecture (Objective 2) and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view (Objective 4). **Therefore, the Project would not conflict with the River Improvement Overlay District.**

(v) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Pedestrian access would be provided from adjacent sidewalks. Internally, pedestrian access would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system.

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

Vehicular access to the residential subterranean parking would be provided via a driveway accessible through the alleyway on the western side of the Project Site. Residential loading docks and loading area are located immediately south of the residential parking entrance. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. The commercial loading dock and loading area are located immediately adjacent to the office parking entrance. All parking would be enclosed and driveways designed in accordance with all applicable requirements so as to not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project would provide landscape improvements and streetscape amenities, including landscaped planters and street trees along Violet Street. Pedestrian access within the Project Site would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system. This paseo also provides pedestrian access to the East 7th Place, Violet Street, and the abutting alley. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

Guideline 8: Protect the site's natural resources and features.

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project Site is located in an urbanized area and is currently developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories. Landscaping is limited, consisting of 16 ornamental trees and ornamental shrubs within portions of the Project Site. Of the on-site tree species, only one tree, a *Platanus Racemosa* (Sycamore), is of a species that is protected by the LAMC.²⁰ The removal of this protected tree is subject to City approval under Ordinance No. 177404, which also requires that this tree be replaced on a 2:1 basis in accordance with the City's

²⁰ Carter, Romanek Landscape Architects, Inc., 2143 Violet St. Los Angeles, Existing Tree Survey, April 16, 2018. Refer to Appendix IS-1.

requirements set forth in Ordinance No. 177404. The remaining on-site trees would be replaced on a 1:1 basis in accordance with the Department of City Planning's policy.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would incorporate energy-efficient design methods and technologies, such as high performance window glazing; passive energy efficiency strategies, such as façade shading, roof overhangs, and porches; high efficiency domestic heaters; and enhanced insulation to minimize solar heat gain. The Project would also include operable windows, shading of unit fenestration through balcony overhangs to prevent excess heat, use of natural light and installation of photovoltaic panels.

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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project would implement either a capture and use system, or biofiltration planters for managing stormwater runoff in accordance with current LID requirements.

Objective 3: Augment the Streetscape Environment with Pedestrian Amenities/ Provide Pedestrian Connections Within and Around the Project.

The Project would provide landscape improvements and streetscape amenities, including landscaped planters and street trees along Violet Street. Pedestrian access within the Project Site would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system. This paseo also provides pedestrian access to the East 7th Place, Violet Street, and the abutting alley. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

Objective 5: Include Open Space to Create Opportunities for Public Gathering/ Utilize Open Areas and Landscape Opportunities to their Full Potential

The Project would provide a publicly accessible pedestrian paseo system on the ground level with art exhibition spaces, landscaped planters, and various gathering and seating areas. Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9 of the residential tower and on Level 8 of the

office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8 of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level 8 of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces. In addition, private residential balconies would be provided throughout the residential tower. Overall, the Project would provide approximately 71,719 square feet of open space, which exceeds the open space requirements set forth by LAMC Section 12.21 G. In addition, the Project would install street trees and landscaped planters along Violet Street.

Objective 6: Improve the Streetscape Experience by Reducing Visual Clutter.

All proposed signage on the Project Site would be designed in conformance to applicable LAMC requirements. The Project would include low-level exterior lights on the proposed building for security and way-finding purposes. Project lighting would be designed to minimize light trespass from the Project Site. Low-level accent lighting to accent signage, architectural features, and landscape elements would also be incorporated. The Project would also screen any necessary rooftop equipment and locate trash enclosures and utility areas within the building so as not to detract from the visual character of the Project Site. In addition, all major utilities would be placed underground and all equipment and trash areas would be required to be screened from public view. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

(vi) City of Los Angeles Walkability Checklist

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use use projects. The Walkability Checklist addresses the following topics, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting.

The Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist and would implement a number of relevant design elements in order to foster a visually appealing pedestrian environment. The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. Recommended implementation strategies that would

be incorporated into the Project include creating a continuous and predominantly straight sidewalk and open space; creating a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (i.e., street trees and landscaped planters along Violet Street) providing adequate sidewalk widths; and incorporating closely planted shade-producing street trees.

The Walkability Checklist strategies regarding crosswalks and street crossings do not apply to the Project because the Project does not include crosswalks or street crossings. In addition, the Walkability Checklist strategies regarding on-street parking do not apply to the Project because no internal roadways are located or proposed within the Project Site. Furthermore, as discussed above, sufficient off-street parking would be provided to meet applicable LAMC parking requirements.

The objective of the Walkability Checklist's utilities section is to minimize the disruption of views and visual pollution created by utility lines and equipment. The Project would screen rooftop equipment and locate trash enclosures and utility areas within the building, so as not to detract from the visual character of the Project Site. In addition, all major utilities would be installed underground or within the alley north of the Project Site. Utilities would also be located away from building entrances. As such, the Project would support the implementation strategies related to the undergrounding and screening of utilities.

Within the Walkability Checklist, building orientation addresses the relationship between buildings and the street as a means of improving neighborhood character and the pedestrian environment. In accordance with the recommended implementation strategies, the Project would designate grade level entrances from the public right-of-way for pedestrians. In addition, the primary building entrance would be visible from adjacent streets and accessible from the sidewalk. The Project's extensive window walls on the Project street frontages would create an inviting pedestrian experience to activate the street. Furthermore, the street frontage would also include landscaped planters, street trees, and appropriate lighting, thus creating a visually interesting, comfortable, and safe pedestrian environment.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining the continuity of the sidewalk; accommodating vehicle access to and from the Project Site with as few driveways as possible; and illuminating all parking areas and pedestrian walkways. The Project would provide a residential parking entrance from the alley and an office parking entrance off of Violet Street. All vehicular parking would be located within the six subterranean parking levels.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As previously described, the Project would install street trees and landscaped planters along Violet Street. In addition, the Project would provide a ground-level landscaped pedestrian paseo system that would connect the existing commercial, office, and residential uses to the new buildings and provide pedestrian access to each of the Project's street frontages, as well as to the abutting alley. In so doing, the Project would achieve the following implementation strategies: providing planting that complements pedestrian movement or views and providing planting that complements the character of the built environment.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. The Project would address many of the relevant implementation strategies, including incorporating different textures, colors, materials, and distinctive architectural features that add visual interest; adding scale and interest to the building façade through articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; discouraging blank walls; contributing to neighborhood safety by providing windows at the street that act as "eyes on the street;" and utilizing the building wall for security between the structure and the street, eliminating the need for fences at the street.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: including signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to building entrances; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are "dark sky" compliant.

Based on the Project elements described above and the analysis herein, the Project would support the applicable Walkability Checklist objectives and implement relevant strategies which would serve to reduce VMT. As such, the Project would be consistent with relevant aspects of the Walkability Checklist.

*(b) Consistency with the 2016–2040 Regional Transportation Plan/
Sustainable Communities Strategy*

The Project's general consistency with the applicable goals and principles set forth in the 2016–2040 RTP/SCS is analyzed in Table 6 of Appendix G of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental

effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region’s transportation system as well as protect the environment and health of the region’s residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site’s location within a SCAG-designated HQT and TPA, as defined in the City’s Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. **Therefore, the Project would not conflict with the applicable objectives of the 2016–2040 RTP/SCS.**

(c) Conclusion Regarding Land Use Impacts Related to Regulatory Consistency

Based on the analysis above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to Threshold (b) and land use policy consistency would be less than significant.

(d) Spot Zoning

The *L.A. CEQA Thresholds Guide* includes as one its land use screening criteria: “Would the project result in a ‘spot’ zone.” If the answer to the screening question is yes, further analysis is required. However, a spot zone does not in and of itself result in a significant land use impact; it merely requires further analysis. This Chapter includes such further analysis and assesses whether the Project would result in a significant impact under the Appendix G thresholds set forth above. As set forth herein, the Project would not physically divide an established community or, conflict with an applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, or conflict with any applicable habitat conservation plan or natural community conservation plan. **Therefore, the project would not result in a significant land use impact as a result of a spot zone.**

(e) Industrial Displacement

The City has policies and objectives within various documents, which discourage the displacement of industrial land. These policies and objectives are not adopted for the purposes of avoiding an environmental effect; nonetheless, they are discussed in Appendix G of this Draft EIR. The potential impacts from industrial displacement to the physical environment could include, but are not limited to an increase in criteria air pollutants, VMT, and numerous site specific impacts from new construction. These impacts are speculative, as it is beyond the scope of this analysis to determine future possible impacts from a myriad of economic conditions. However, the Project Site currently developed primarily with live/work, office, and commercial uses, and the 2,109 square feet of existing warehouse uses would be retained.

According to the Central City North Community Plan, there are 1,180 acres (approximately 60 percent of the 2,005-acre total) of industrially zoned property in the Community Plan area. The Project Site comprises 2.2 acres, or only approximately 0.2 percent of the industrially zoned land and approximately 0.11 percent of the total land in the Community Plan area. The conversion of industrial land is an economic issue that is not with the scope of CEQA review. As discussed above, these impacts would be speculative, and no industrial uses are currently located on site to be displaced. **Therefore, the Project would not displace any industrial uses, and impacts would be less than significant.**

(2) Mitigation Measures

Impacts would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

e. Cumulative Impacts

Cumulative growth in the Project vicinity includes 74 specific known development projects as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. These related projects primarily include apartment, condominium, retail, restaurant, commercial, hotel, and office uses.

(1) Impact Analysis

(a) Physically Divide a Community

The Project and related projects are located in the Arts District, which was previously characterized by warehouse and industrial uses but has undergone substantial change over the last few years, resulting in a significant amount of residential and commercial redevelopment. The Project and many of the related projects are infill developments that would be constructed within sites currently or previously constructed with other uses. The uses proposed by the Project and related projects would be compatible with the existing and planned uses in the Arts District. Similar to the Project, the proposed construction associated with the related projects would be confined to the related project sites and would not physically divide a community. In addition, based on the mix of building types and building heights that are currently seen in the Arts District and Project Site vicinity, the Project along with the related projects would be compatible with the various existing developments in the vicinity of the Project Site and larger surrounding area. Therefore, the Project and the related projects would be consistent with the current development trends in the Arts District and would not be expected to fundamentally alter the existing land use relationships in the area. **As such, cumulative impacts related to the physical division of a community would be less than significant.**

(b) Conflict with Applicable Goals, Objectives, and Policies Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would not substantially conflict with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, cumulative impacts with regard to land use conflicts would be less than significant.**

(c) Spot Zoning

As noted above, the question of whether a project results in a spot zone is merely a screening criterion under the *L.A. CEQA Thresholds Guide*; a spot zone does not in and of itself constitute a significant impact. If a related project would result in the creation of a spot zone, it would be subject to further CEQA analysis to determine whether there would be a significant land use impact under the Appendix G thresholds of significance. If necessary, the City would require mitigation measures. Moreover, as noted above, the Project would not result in a significant land use impact as a result of a spot zone. **Therefore, cumulative impacts with respect to spot zoning would be less than significant.**

(d) Industrial Displacement

As discussed above, the City has policies and objectives within various documents, which discourage the displacement of industrial land. These policies and objectives are not adopted for the purposes of avoiding an environmental effect; nonetheless, they are discussed in Appendix G of this Draft EIR. The potential impacts from industrial displacement to the physical environment could include, but are not limited to an increase in criteria air pollutants, VMT, and numerous site specific impacts from new construction. These impacts are speculative, as it is beyond the scope of this analysis to determine future possible impacts from a myriad of economic conditions. However, the Project Site currently developed primarily with live/work, office, and commercial uses, and the 2,109 square feet of existing warehouse uses would be retained.

As noted above, the Project Site comprises 2.2 acres, or only approximately 0.2 percent of the industrially zoned land in the Central City North Community Plan area. The related projects that are seeking zone changes and General Plan amendments from industrial designations comprise a total of approximately 63.80 acres of industrially zoned land. The Project, together with the related projects, comprise approximately 66 acres of industrially zoned land, which represents less than 6 percent of the total industrially zoned land in the Community Plan area. Moreover, the conversion of industrial land is an economic issue that is not within the scope of CEQA review. While the Project and the related projects may displace existing warehouse or industrial uses, it is unclear whether these uses will go out of business or relocate. It would be speculative to assume that they will relocate to other sites in the area. If they were to relocate, it is unclear whether these businesses would move into existing buildings or seek to develop new facilities. Any impacts from relocation of facilities would be speculative and outside the scope of this analysis. Additionally, new facilities would require discretionary approval, CEQA review, and would be required to implement feasible mitigation for any significant impacts that would result. Further, as noted above, the Project would not result in the displacement of any industrial uses. **As such, cumulative impacts related to displacement of industrial uses would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to land use would be less than significant. Thus, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to land use would be less than significant.