

IV. Environmental Impact Analysis

H. Land Use

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impacts related to the potential physical division of an established community were fully evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Specifically, Section IV.A, Air Quality, of this Draft EIR, evaluates Project consistency with the Southern California Association of Government's (SCAG's) South Coast Air Quality Management Plan (AQMP). Project consistency with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is evaluated in this section and in Sections IV.A, Air Quality;¹ IV.E, Greenhouse Gas Emissions; and IV.K, Transportation.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

¹ Section IV.A, Air Quality, of this Draft EIR also evaluates the Project against the 2016-2040 RTP/SCS as SCAG's current AQMP incorporates the transportation strategy and transportation control measures from the 2016–2040 RTP/SCS.

- City of Los Angeles General Plan
- Central City North Community Plan
- Los Angeles Municipal Code
- Redevelopment Plan for the Central Industrial Redevelopment Project
- Citywide Design Guidelines
- River Improvement Overlay District
- Industrial Land Use Policy
- Freeway Adjacent Advisory Notice for Sensitive Users (ZI No. 2427)

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects,

which help achieve AB 32 goals to reduce GHG emissions. See Section IV.E, Greenhouse Gas Emissions, of this Draft EIR for further discussion of SB 375.

(2) Regional

(a) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, and the provision of services by other regional agencies. SCAG’s overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal’s “Core Vision” centers on maintaining and better managing the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans “Key Connections” augment the “Core Vision” to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions’ overall quality of life. These benefits include but are not limited to a 5-percent reduction in VMT per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)² by 6 percent and the share of new job growth in HQTAs by 15 percent. Refer to Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, of this Draft EIR for further discussion of the RTP/SCS.

² HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minute or less service frequency during peak commuting hours.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),³ originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,⁴ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the General Plan Framework, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The General Plan Framework provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(1) Land Use Chapter

The General Plan Framework Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts,

³ City of Los Angeles, Department of City Planning, *City of Los Angeles General Plan Overview*, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed September 27, 2022.

⁴ The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives, or requirements particular to that city or county (Government Code Section 65303).

improved efficiency in the use of energy, improved efficiency, and, thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment. Based on the General Plan Framework, the Project Site is located just outside the Downtown Center, which is defined as an international center for finance and trade that features dense, high-rise development.⁵

(2) Urban Form and Neighborhood Design Chapter

The General Plan Framework Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.⁶ The General Plan Framework does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(3) Open Space and Conservation Chapter

The General Plan Framework Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

⁵ Los Angeles Department of City Planning, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Figure 3-1: Long Range Land Use Diagram—Metro*, re-adopted by City Council on August 9, 2001.

⁶ *City of Los Angeles General Plan Framework*, p. 5-1, et. seq.

(4) Economic Development Chapter

The General Plan Framework Economic Development Chapter includes goals, policies, and objectives that address the appropriate land use locations for development. The Economic Development Chapter also establishes mutual development objectives for land use and economic development. The Economic Development Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Economic Development Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

(5) Transportation Chapter

The General Plan Framework Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies, and objectives that overlap with policies included in other chapters of the General Plan Framework regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the General Plan Framework is implemented through the General Plan's Mobility Plan 2035, which is a comprehensive update of the General Plan Transportation Element.

(6) Infrastructure and Public Services Chapter

The General Plan Framework Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development, as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

(ii) Transportation Element

The Transportation Element (again, Mobility Plan 2035), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates “complete streets” principles, and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (A B 1358).

The purpose of Mobility Plan 2035 is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While Mobility Plan 2035 focuses on the City’s transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. Mobility Plan 2035 includes the following five main goals that define the City’s high-level mobility priorities:

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

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City’s natural resources. Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

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

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City’s General Plan, provides high-level policy vision, along with measurable objectives and

implementation programs to elevate health as a priority for the City's future growth and development.⁷ Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes Chapter 5, *An Environment Where Life Thrives*, which identifies the following environmental policies:

- Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
- Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.
- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

This General Plan Element includes policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State, regional, and local policies which call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(v) *Central City North Community Plan*

The Project Site is located within the Central City North Community Plan area.⁸ The Central City North Community Plan, adopted in 2000 and updated in 2016, is the land use

⁷ *City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015.*

⁸ *City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 2159 East Bay Street, <http://zimas.lacity.org>, accessed September 27, 2022.*

element of the General Plan applicable to the area in which the Project Site is located (i.e., the Central City North Community Plan Area). The Community Plan implements the General Plan Framework and includes land use designations, density limits, building heights, and other provisions to implement the development that supports the City's policies and development vision for the future.⁹

The Central City North Community Plan was developed to preserve and enhance the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing; improving the function, design, and economic vitality of the commercial corridors; preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximizing the development opportunities of future transit systems while minimizing any adverse impacts; and planning the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Community Plan Area.¹⁰

The Project Site is located near the Los Angeles River in the Community Plan's South Industrial subarea and just south of the Artists-in-Residence District (Arts District), where many warehouses and industrial spaces have been converted to artists' lofts and studios. The Community Plan encourages the development and expansion of the artists-in-residence community within the Project vicinity. As shown in Figure IV.H-1 on page IV.H-10, the current land use designation for the Project Site, pursuant to the Community Plan, is Heavy Industrial. The Project's consistency with applicable land use policies in the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below.¹¹

The DCP is currently updating the Central City North Community Plan in conjunction with an update to the Central City Community Plan, whose areas together make up Downtown Los Angeles, in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully

⁹ City of Los Angeles, *Central City North Community Plan*, adopted September 7, 2000, updated December 15, 2016.

¹⁰ City of Los Angeles, *Central City North Community Plan*, adopted September 7, 2000, updated December 15, 2016.

¹¹ City of Los Angeles, *Central City North Community Plan*, adopted September 7, 2000, updated December 15, 2016.



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

accommodating projected future growth. Specifically, the following core principles represent the long-term priorities for the draft DTLA 2040 Plan:¹²

- Accommodate anticipated growth 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
- Strengthen neighborhood character
- Promote a transit, bicycle, and pedestrian friendly environment
- Create linkages between districts
- Create a World-Class Public Realm

As currently proposed by the draft DTLA 2040 Plan, the Project Site would be designated as Hybrid Industrial, The DTLA 2040 Plan proposes the following description of the Hybrid Industrial area:¹³

Hybrid Industrial areas preserve productive activity and prioritize employment uses, but may accommodate live/work uses or limited residential uses. The building form ranges from Low-Rise to Mid-Rise. Uses include light industrial, commercial, and office, with selective live/work uses. The residential density generally is limited by floor area. In the Downtown Plan this land use designation has a max FAR range of 3.0–6.0.

The DTLA 2040 Plan is anticipated to be the first Community Plan to apply new zoning as part of the City's comprehensive Zoning Code update. The DTLA 2040 Plan will inform developers and homeowners of allowable development options, densities, and intensities; outline strategies for how to accommodate planned growth; and bring the Central City North Community Plan up-to-date as an improved planning tool. The DTLA 2040 Plan process began in 2014, and the City released a Draft Community Plan Update in June 2019 and the proposed zones and zoning map for the DTLA area in October 2019, followed by a series of open houses in November 2019. The DTLA 2040 Plan Draft

¹² City of Los Angeles, *Downtown Community Plan, Proposed Draft Spring 2021, Chapter 1, page 14.*

¹³ City of Los Angeles, *Downtown Community Plan, Proposed Draft Spring 2021, Chapter 1, page 14.*

Environmental Impact Report was published in 2020 and was followed by a public comment period. Subsequently, a virtual public hearing was held on December 8, 2020. The DTLA 2040 Plan was approved by the City Planning Commission on September 23, 2021. The DTLA Plan has not yet been adopted by the City Council and is subject to change. The Project includes a Vesting Tentative Tract Map (VTTM) and a Vesting Zone/Height District Change.¹⁴ Thus, the current adopted Central City North Community Plan is the local adopted community plan that will apply to the Project, which is therefore evaluated in the impact analysis below.¹⁵ In addition, as the DTLA 2040 Plan is in draft form and has not yet been adopted, further analysis of the Project's consistency with the proposed plan would be premature and speculative.¹⁶

(b) Los Angeles Municipal Code

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

¹⁴ The VTTM and Vesting Zone/Height District Change are relevant in that even if the new Community Plan were adopted prior to Project approval, the Project would be subject to the Community plan that was in effect when the map application and Vesting Zone/Height District Change were deemed complete based on LAMC Sections 17.15-C,1 and 12.32-Q,2 (see footnote 16 below) and the Subdivision Map Act. Planning issued a deemed complete letter on 2-22-17.

¹⁵ LAMC Section 17.15-C,1 states that: "The approval or conditional approval of a vesting tentative map shall confer a vested right to proceed with development in substantial compliance with the ordinances, policies and standards in effect on the date the application is deemed complete, and with the conditions of approval imposed and specifically enumerated by the Advisory Agency, including the submittal of a detailed grading plan under an approved grading permit prior to recordation of the final map. Such rights shall not include exemptions from subsequent changes in the Building and Safety and Fire regulations contained in Chapters V and IX of the Los Angeles Municipal Code and policies and standards relating thereto." Similarly, LAMC Section 12.32-Q,2(a) provides: The approval of a vesting application shall confer a vested right to proceed with a development in substantial compliance with the rules, regulations, ordinances, zones and officially adopted policies of the City of Los Angeles in force on the date the application is deemed complete, and with the conditions of approval imposed and specifically enumerated by the decision maker in its action on the vesting application case. These rights shall not include exemption from other applications or approvals that may be necessary to entitle a project to proceed (i.e., subdivision, parcel map, zone variance, design review, etc.) and from subsequent changes in the Building and Safety and Fire regulations contained in Chapters V and IX of the Los Angeles Municipal Code found necessary by the City Council to protect the public health and safety and which are applicable on a citywide basis and policies and standards relating to those regulations or from citywide programs enacted after the application is deemed complete to implement State or Federal mandates.

¹⁶ See *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134.

As shown in Figure IV.H-2 on page IV.H-14, 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. Within the M3 zone, Height District 1 does not specify a building height limit but limits the FAR to 1.5:1. The RIO designation indicates that the Project Site is located within the River Improvement Overlay (RIO) District, which provides for the preservation of tributaries and rivers in the City by promoting river identity, supporting local species, and providing convenient access, as discussed further below. In addition, the Project Site is located within a Transit Priority Area (TPA,) as defined by ZI File No. 2452.

(c) Central Industrial Redevelopment Plan

Redevelopment Plans outline a community vision and revitalization opportunities within specific neighborhoods across the City. Each Redevelopment Project Area has a unique set of land use restrictions designed specifically to enhance the quality of life for the community. The Project Site is located within the Redevelopment Plan for the Central Industrial Redevelopment Project (Redevelopment Plan),¹⁷ which was adopted by the City Council on November 15, 2002, pursuant to Ordinance No. 174,978. The Redevelopment Plan covers an approximately 738-acre area that 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. This area is predominantly industrial with a commercial presence, a residential community comprised of an emerging artist residential loft district, and single room occupancy hotels serving residents of Skid Row.¹⁸ 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.¹⁹

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 did not, however, dissolve adopted

¹⁷ City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 2159 East Bay Street, <http://zimas.lacity.org>, accessed September 27, 2022.

¹⁸ CRA/LA, Plans & Work Program, Fact Sheet, Central Industrial Redevelopment Project.

¹⁹ City of Los Angeles, Central Industrial Redevelopment Project Draft Environmental Impact Report, April 2002, p. 2-1.



GENERALIZED ZONING

- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- OS, GW
- Project Site

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

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.

(d) Citywide Design Guidelines

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

(e) Plan Overlays/River Improvement Overlay (RIO)

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

As indicated above, the Project Site is located within the River Improvement Overlay (RIO) District.²⁰ Effectuated by Ordinance No. 183,145 in August 2014, the RIO District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable development regulations and design guidelines. The purposes of the RIO District are to support the goals of the Los Angeles River Revitalization Master Plan (LARRMP); contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs.

(f) Freeway Adjacent Advisory Notice for Sensitive Users (ZI No. 2427)

The Project Site is located within an area subject to the City's Freeway Adjacent Advisory Notice for Sensitive Users (Zoning Information File [ZI] No. 2427).²¹ ZI No. 2427 provides design and siting guidelines for discretionary residential projects and sensitive uses (i.e., schools, day care centers, and senior care centers) located within 1,000 feet of a freeway. ZI No. 2427 requires all projects seeking discretionary approval for which findings must be made regarding conformance to the General Plan to adhere to the Citywide Design Guidelines, including those that address freeway proximity. While the Project Site is located within an area subject to ZI No. 2427, the Project does not propose residential or sensitive uses. As such, ZI No. 2427 does not apply to the Project.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the 74,063 square foot (1.70 acre) Project Site is currently developed with three buildings that are comprised of the following: 7,106 square feet of office uses in Building 1; 6,584 square feet of light industrial uses in Building 2; and 25,638 square feet of light industrial and creative office uses in Building 3. In total, the three existing buildings comprise 39,328 square feet of floor area. Other smaller structures at the Project Site include shipping containers that have

²⁰ City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 2159 East Bay Street, <http://zimas.lacity.org>, accessed September 27, 2022.

²¹ City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for 2159 East Bay Street, <http://zimas.lacity.org>, accessed September 27, 2022.

been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated areas for storage of industrial byproducts and materials associated with the on-site uses are located on the south side of Building 3. The Project Site is relatively flat with limited ornamental landscaping.

As discussed above, the Project Site is designated as Heavy Industrial by the Central City North Community Plan and is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay) by the LAMC. The Project Site is also located within a TPA as designated by the City and within an HQTAs as designated by SCAG.^{22,23}

(2) Surrounding Uses

The Project Site is located in the Community Plan's South Industrial subarea, and the surrounding properties are developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. More specifically, the Project Site is bordered by textile and import businesses north of Bay Street, including a motorcycle dealership directly across Bay Street; industrial-zoned property to the west developed with one-story commercial/industrial buildings and a surface parking lot; warehouse uses including knitting mills and fabric warehouses south of Sacramento Street; and industrial-zoned properties to the east used for surface parking and the Burlington Northern Santa Fe (BNSF) railroad. Beyond the BNSF railroad to the east is the Los Angeles River. There are also restaurants located within several blocks of the Project Site. Similar to the Project Site, the surrounding properties are zoned M3-1-RIO and designated for Heavy Industrial land uses by the Central City North Community Plan.

Additionally, the Project Site is located at the southern edge of the Arts District area, which has experienced substantial residential and commercial growth over the past decade as former industrial and warehouse buildings have been converted to live/work spaces and commercial uses. Nearby residential buildings include the Toy Factory Lofts (six stories), Biscuit Company Lofts (seven stories), 2121 Lofts (three stories), and the AMP Lofts project located at 7th Street and Santa Fe Avenue. With the influx of residential uses in the area, commercial development has followed such as grocery markets and restaurants. The Arts District is also home to SCI-Arc, a prominent school of architecture, and the Los Angeles offices of the Daily Journal, California's legal daily newspaper.

²² SCAG, *Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 3.8.*

²³ Los Angeles County Metropolitan Transportation Authority (Metro), *High Quality Transit Areas—Southeast Quadrant map.*

The Project Site is located approximately 0.5 mile south of the 6th Street Viaduct project that is currently under construction and that will provide a two-way multi-modal bridge with dedicated bicycle lanes that will span the Los Angeles River and connect to the Boyle Heights neighborhood to the east.²⁴ Plans for the Sixth Street Viaduct Replacement Project also call for new recreational green spaces on former industrial sites underneath the new bridge.²⁵ The City's proposed Sixth Street Park, Arts, River & Connectivity Improvements (PARC) Project would create approximately 13 acres of public recreational space with office/community/concession building(s), play courts/fields, water features, a dog park, etc., underneath and adjacent to the Sixth Street Viaduct between Mateo Street and U.S. 101. The PARC Project is located approximately 0.5 mile north of the Project Site.²⁶

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): 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.

As previously discussed, the Initial Study prepared for the Project, and included in Appendix A of this Draft EIR, determined that the Project would result in a less than significant impact related to the Project's potential to physically divide an established community (Threshold (a)). For the remaining threshold, the analysis utilizes factors and considerations identified in the City's 2006 LA CEQA Thresholds Guide, as appropriate, to assist in answering Appendix G Threshold question (b):

²⁴ City of Los Angeles, Bureau of Engineering, Sixth Street Viaduct Replacement Project, About the Project, www.sixthstreetviaduct.org/about_the_project, accessed September 14, 2021.

²⁵ City of Los Angeles, Bureau of Engineering, Sixth Street Viaduct Replacement Project, About the Project, www.sixthstreetviaduct.org/about_the_project, accessed September 14, 2021.

²⁶ City of Los Angeles, Bureau of Engineering website, <https://eng.lacity.org/about-us/divisions/environmental-management/projects/sixth-street-park-arts-river-connectivity-improvements-parc>, accessed December 29, 2021.

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

b. Methodology

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

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

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. As discussed in the Office of Planning and Research (OPR), State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony”

with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.²⁷

To the extent that the Project's 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 Element and Mobility Element in Transportation) that plan is not further discussed in this section.

c. Project Design Features

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

d. Analysis of Project Impacts

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

As discussed in Section VI, Other CEQA Considerations, of the Draft EIR, and the Initial Study for the Project, which is included in Appendix A of this Draft EIR, the Project Site is located in a highly urbanized area that is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, including a motorcycle dealership directly north of the Project Site across Bay Street, a surface parking lot and railroad yard to the east, knitting mills and fabric warehouses to the south, and a surface parking lot and one-story commercial/industrial building to the west. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project does not propose a freeway or other large infrastructure that would divide a community. As such, the Project would not physically divide an established community. Therefore, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.

Threshold (b): Would the Project conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

²⁷ Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

(1) Impact Analysis

(a) Consistency with Regional Plans

(i) SCAG 2020-2045 RTP/SCS

The Project's general consistency with the applicable goals set forth in the SCAG 2020–2045 RTP/SCS is discussed in Table 1 of Appendix I of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, SCAG's 2020-2045 RTP/SCS, Sustainable Communities Strategy Technical Report, identifies Priority Growth Areas in the region where growth is forecasted to occur due to proximity to existing and planned transit, existing job centers, existing and planned infrastructure to support more walkability and use of alternative transportation modes, and in areas identified for jurisdictional expansion (i.e., spheres of influence). The Project Site falls within an identified Priority Growth Area under the 2020-2045 RTP/SCS. Further, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing commercial and office uses on a Project Site that is well served by a variety of nearby mass transit options, including a number of rail lines as well as five bus lines within 0.5 mile of the Project Site (including three within 0.25 mile). The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG HQTAs and TPAs, as defined by PRC Section 21099. Furthermore, in accordance with Mitigation Measure TR-MM-1 as detailed in Section IV.K, Transportation, of this Draft EIR, the Project would implement a Transportation Demand Management (TDM) Program to reduce trips by including measures such as unbundled parking, parking cash-out, ride-share programs, and education and incentive programs. The Project would promote walking and use of bicycles by installing a sidewalk along Bay Street where none exists today, widening the sidewalk on Sacramento Street, and adding a new traffic signal with crosswalks at Sacramento Street and Santa Fe Avenue, including a pedestrian paseo for access between Sacramento Street and Bay Street, and providing 78 bicycle parking spaces along with bicycle lockers and showers for employees and visitors. The Project would also include adequate parking to serve the proposed uses and would provide parking spaces equipped with electric vehicle (EV) charging stations as well as additional facilities capable of supporting future electric vehicle supply equipment (EVSE). As such, the Project would support the reduction in greenhouse gas emissions, encourage the use of alternative modes of transportation (i.e., walking, biking, public transit) and reduce dependency on single-occupancy vehicles. Therefore, as detailed in Table 1 of Appendix I of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

(b) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the goals, objectives, and policies of the General Plan Framework, Conservation Element, Health and Wellness Element, Mobility Plan 2035, the Central City North Community Plan, LAMC, the River Improvement Overlay District, the Redevelopment Plan for the Central Industrial Redevelopment Project, and the Citywide Design Guidelines.

(i) Los Angeles General Plan

(1) General Plan Framework

The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix I 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 General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

As discussed above, the Project Site is located in an industrial area by the Los Angeles River, just east of the Downtown Center (identified in the General Plan Framework's Long Range Land Use Diagram for the City's Metro area) and near the southern edge of the Arts District. The site is designated for Heavy Industrial land uses per the Community Plan. The Project would support and would be consistent with the applicable goals, objectives, and policies of the Land Use Chapter of the General Plan Framework. Specifically, the Project would develop 217,189 square feet of creative offices and 5,000 square feet of retail and restaurant uses, which would support the employment and commercial needs of the growing number of residents, businesses, and visitors in the Arts District. Development of the Project would be consistent and compatible with other uses in the surrounding industrial area and the broader 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 immediate Project vicinity is currently developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses, and, in recent years, former industrial and warehouse buildings in the Arts District and surrounding area have been redeveloped as residential live/work units, incubator spaces, art galleries, restaurants, drinking establishments, breweries, coffee shops, and eclectic retail shops. In addition, as discussed in Section III, Environmental Setting, of this Draft EIR, a wide range of development projects are proposed to redevelop land in the Project Site vicinity with a variety of apartments/condominiums, offices, retail uses, restaurants, hotels, and schools, including mixed uses similar to those of the Project.

The Project Site is in an area well-served by public transit, including five Metro bus lines within 0.5 mile (including three within 0.25 mile) that provide not only widespread service in the City but also access to other mass transit opportunities such as Metro's light rail system, as well as the nearby Greyhound Bus Terminal. The Project Site also 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, installing new landscaping and streetscape improvements around the Project Site, and providing a pedestrian paseo to connect Bay Street and Sacramento Street. The pedestrian paseo would incorporate various gathering zones that would include potted plants, while a landscaped terrace on Level 10 of the proposed high-rise building would provide open space for office tenants. The Project would also provide bicycle parking spaces, bicycle lockers, and showers on-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 objectives and policies that support the goals set forth in the General Plan Framework's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(b) Urban Form and Neighborhood Design Chapter

The Project would promote the applicable goals and objectives of the Urban Form and Neighborhood Design Chapter by introducing a new creative office campus with retail and restaurant uses that would activate the existing site. The Project would create a pedestrian environment along Bay Street and Sacramento Street, which currently lack fully developed pedestrian infrastructure, by providing new or widened sidewalks, crosswalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the creative office tenants along a pedestrian paseo. The building design, landscaping, and streetscape improvements proposed under the Project would upgrade the quality of development on the Project Site and improve the public realm. Project signage would be designed to be compatible with the Project buildings and with other signage in the Project area. In addition, the Project would incorporate design features to promote individual and community safety on the Project Site. As such, the Project would enhance the quality of development and the public realm surrounding the Arts District. Therefore, the Project would not conflict with the applicable objectives and policies in the Urban Form and Neighborhood Design Chapter of the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Open Space and Conservation Chapter

As discussed above, the Project would provide a publicly-accessible pedestrian paseo through the Project Site to connect Bay Street and Sacramento Street. This paseo would include landscaped planters and various gathering spaces, and the Project Site

street frontages would be planted with street trees. Additionally, the Project would feature an outdoor courtyard that would serve as an open-air “forum” at the end of Bay Street and would connect to the paseo. The high-rise building would also feature an outdoor terrace for office tenants that would provide views to the nearby Downtown skyline and would be landscaped with potted plants. These spaces would be on-site and privately managed and would not encroach upon other land uses. Therefore, the Project would not conflict with the applicable goal in the Open Space and Conservation Chapter of the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Economic Development Chapter

The Project’s development of 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant space would create new employment opportunities. The Project would support the employment base of the Community Plan area and foster continued economic investment. The proposed uses would also be developed in an area with convenient access to public transit and opportunities for walking and biking, and would increase opportunities for walking with the development of an on-site pedestrian paseo connecting Bay Street and Sacramento Street, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality. As such, the Project would not conflict with the applicable objective and policy in the Economic Development Chapter of the General Plan Framework.

(e) Infrastructure and Public Services Chapter

Wastewater generated by the Project would be typical of office, retail, and restaurant uses, and would not include industrial grade discharge containing hazardous substances. As described in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, the Project would use potentially hazardous materials, including those commonly used for building and ground maintenance, cleaning solvents, and pesticides for landscaping. Activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements. In addition, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project would implement best management practices (BMPs) to minimize the discharge of pollutants in stormwater runoff and would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would include water conservation features to reduce water usage. Accordingly, the total amount of wastewater flow from the Project Site would also be reduced. In addition, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. Furthermore, appropriate lighting would be provided to provide visibility and minimize light trespass. Therefore, the Project would not conflict with the applicable goals, objectives, and

policies in the Infrastructure and Public Services Chapter of the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect.

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

(2) Mobility Plan 2035

As detailed in Table 3 in Appendix I of this Draft EIR, Mobility Plan 2035 sets forth policies to address the safety of streets and all modes of travel, the reduction of single occupancy vehicles and VMT, and the provision of a sustainable transportation system.

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 and Worksite Traffic Control 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 support the City's policies to provide for safe passage of all modes of travel during operation, ensure high-quality pedestrian access, and provide a safe and comfortable walking environment by: (1) separating pedestrian and vehicular traffic, including separate pedestrian and vehicular access to and circulation within the Project Site; (2) installing a sidewalk along Bay Street where none exists today, widening the sidewalk on Sacramento Street, and adding a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue; and (3) providing streetscape improvements and landscaping and creating a pedestrian paseo to allow access through the Project Site between Bay Street and Sacramento Street.

In addition, the Project's improvements to Bay Street and Sacramento Street would comply with Mobility Plan 2035. Specifically, on the west portion of Bay Street, the Project would decrease the half roadway width from 30 feet to 20 feet, which would still meet the 20-foot required width. The Project would dedicate 3 feet and provide a 33-foot half right-of-way width and a 13-foot sidewalk to comply with Mobility Plan 2035 requirements. On the east portion of Bay Street, the Project would provide a 30-foot half roadway width to maintain the existing width, which would exceed the required width. This section of the roadway width would accommodate a fire truck turnaround and a passenger drop-off zone. Therefore, on Bay Street, the Project would be in compliance with Mobility Plan 2035. On Sacramento Street, per Mobility Plan 2035, the required dimensions are a 33-foot half right-of-way width, a 20-foot half-roadway, and 13-foot sidewalk. The existing dimensions for Sacramento Street include a 30-foot half right-of-way width, 20-foot roadway width, and a

10-foot sidewalk. The Project would retain the 20-foot half roadway width and meet the requirement. The Project would dedicate 3 feet and provide a half right-of-way width of 33 feet with a 13-foot sidewalk and would be in compliance with Mobility Plan 2035.

Furthermore, the Project would support ways to reduce VMT and promote the City's policy to recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle parking spaces, lockers, and showers. In accordance with Mitigation Measure TR-MM-1, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips by including measures such as unbundled parking, parking cash-out, ride-share programs, and education and incentive programs. Given the Project's proximity to multiple public transit options, the Project would provide employees and visitors convenient access to transit services. Specifically, the Project would develop 217,189 square feet of creative offices and 5,000 square feet of retail and restaurant uses, which would support the employment and commercial needs of the growing number of residents, businesses, and visitors in the Arts District. As such, the Project would serve to reduce VMT. Therefore, as detailed in Table 3 in Appendix I of this Draft EIR, the Project would not conflict with the applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect.

(3) 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 in 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, the Project Site does not contain any historical resources, and the Project would not result in direct or indirect impacts to historical resources. The Project would also adhere to the City's standard condition of approval for archaeological resources, implement a Project Design Feature (i.e., CUL-PDF-1) which requires training of construction workers in the identification of archaeological resources, implement mitigation (i.e., GEO-MM-1 through GEO-MM-5) to ensure that potential impacts to archaeological and paleontological resources would remain less than significant. Therefore, the Project would not conflict with Section 5 of the Conservation Element. Furthermore, as analyzed in the Initial Study included in Appendix A of this Draft EIR, 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 Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect.

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

As previously discussed, the Health and Wellness Element includes the goal to provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins. Under this goal, the Health and Wellness Element includes a policy to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health. The Project would encourage pedestrian activity on and around the Project Site by constructing new or widened sidewalks, creating more pedestrian-scaled Project frontages along Bay Street and Sacramento Street, and providing a pedestrian paseo through the Project Site. Additionally, the Project would feature an outdoor courtyard that would serve as an open-air “forum” at the end of Bay Street and would connect to the paseo. Commercial uses and storefronts would be placed at ground level to increase transparency and create a more welcoming pedestrian environment. The ground-level pedestrian paseo system would include landscaped planters and gathering areas that would connect the commercial and office uses and provide access to Bay Street and Sacramento Street. In addition, the Project would provide 78 bicycle parking spaces, bicycle lockers, and showers to promote biking, and the Project's close proximity to nearby retail, restaurants, and jobs would also promote pedestrian and transit accessibility via the numerous bus lines within the vicinity (including five Metro lines within 0.5 mile, three of which are within 0.25 mile, of the Project Site). As such, the Project would support the Health and Wellness Element's efforts to reduce vehicle use through implementation of smart growth mixed land use patterns, which would support the reduction of air pollution. Therefore, the Project would not conflict with the applicable goal and policy set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

(5) Central City North Community Plan

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

The Project Site is currently developed with 39,328 square feet of floor area comprised of office, creative office, and light industrial uses. Under existing conditions, no sidewalk exists adjacent to the Project Site on Bay Street, and limited ornamental landscaping surrounds the site. Upon completion, the Project would increase the footprint on the Project Site by developing approximately 217,189 square feet of creative office space and 5,000 square feet of new retail and restaurant space. These uses would complement the recent development trends in the Arts District and would increase the number of on-site employees and visitors. The Project would also enhance pedestrian

activity within and around the Project Site by providing new and widened sidewalks, street trees, ground floor commercial space with storefront glazing, and lobby entrances for the office/creative office tenants along a pedestrian paseo. The paseo would allow pedestrians to access Bay Street and Sacramento Street through the Project Site, and would include landscaped planters and various gathering areas. Thus, the Project would enhance pedestrian connections in the area.

The Project design and improvements of the currently underutilized site would enhance pedestrian activity and promote walkability. The Project Site's proximity to a variety of public transit options and nearby commercial and offices uses, combined with the provision of bicycle parking spaces, bicycle lockers, and showers on-site would also promote alternative modes of transportation that would reduce vehicle trips. Furthermore, in accordance with Mitigation Measure TR-MM-1, the Project would implement a TDM Program, including unbundled parking, parking cash-out, ride-share programs, and education and incentive programs, to promote non-auto travel and reduce the use of single-occupant vehicle trips.

Based on the above and as presented in Table 4 of Appendix I of this Draft EIR, the Project would not conflict with the applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(ii) Los Angeles Municipal Code

As shown in Figure IV.H-2 on page IV.H-14, 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. Height District 1 does not specify a building height limit, but limits the FAR to 1.5:1. The RIO designation indicates that the Project Site is located within the River Improvement Overlay District.

As previously described, the Project would develop 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant uses. The new uses would be located in three new buildings, including a 10-story commercial high-rise building with a maximum height of 190.23 feet, a two-story commercial building with a maximum height of 35.23 feet, and a one-story commercial building with a maximum height of 17.23 feet. A one-story electrical enclosure would also be developed. Upon completion, the Project would comprise 222,189 square feet of floor area.

The Project Applicant requests approval of a Vesting Zone and Height District Change from M3-1-RIO to M3-2D-RIO to permit an FAR of 3.0:1 (before required dedications). Footnote No. 6 of the Central City North Community Plan provides that "for properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their

equivalent), development exceeding a floor area ratio of 1.5:1 up to 3:1 may be permitted through a zone change height district change procedure, including an environmental clearance.”²⁸ As such, with approval of the Height District 2D request referenced above, the Project would be allowed to develop 222,189 square feet of floor area, which would correspond to a FAR of 3.0:1 (before required dedications).

Pursuant to LAMC Section 12.21.A.4(x)(3)6., the Project is eligible for a reduced commercial parking requirement of 2 parking spaces per 1,000 square feet of commercial use because the Project Site is within the former Los Angeles State Enterprise Zone. Based on LAMC requirements, the Project would be required to provide 444 vehicle parking spaces. The Project would exceed this requirement by providing 711 vehicle parking spaces within the four subterranean levels and ground level. Since the Project’s location at the terminus of a dead-end street does not provide an abundance of surrounding public parking, it is essential that the Project is able to accommodate its anticipated parking demand, while not exacerbating the shortage of available surrounding on-street parking by under-serving the Project. As such, the additional parking spaces are necessary to meet the demand of prospective office and retail/restaurant tenants. The Project’s parking ratio would be comparable to those applied to other office properties within the Arts District (i.e., At Mateo, 4th & Traction, The Row, and Ford Factory). In addition, the Project’s parking areas could be repurposed in the future as transit options expand within the vicinity. The Project also would comply with California Green Building Standards (CALGreen) Code and City of Los Angeles requirements for the provision of electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. Specifically, 30 percent of the Project’s parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of spaces would have EV charging stations, as required by City of Los Angeles Ordinance 186,485 and Ordinance 186,488. In addition, the Project would provide 78 bicycle parking spaces (28 short-term and 50 long-term) as required by the LAMC.

The Project Applicant also seeks the approval of a Vesting Tentative Tract Map with one ground lot and four commercial condominium units; a haul route approval; a Site Plan review for the construction of a mixed-use commercial building with 222,189 square feet of floor area; and a Master Conditional Use Permit to allow the sale and/or dispensing of a full line of alcoholic beverages for on- and off-site consumption for up to six establishments.

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

²⁸ *City of Los Angeles, City Planning Department—Systems and GIS Division, Central City North Community Plan, General Plan Land Use Map (as of February 25, 2014).*

(iii) River Improvement Overlay District/River Design Guidelines

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 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: incorporating a pedestrian paseo on the River side of the Project Site with access to ground floor retail and restaurant uses that use appropriate storefront glazing (Objective 1); employing high quality, attractive and distinguishable architecture and designing the Project in substantial compliance with the Citywide Design Guidelines (Objective 2); creating new view opportunities of the River from the paseo and high-rise building terrace (Objective 3); 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 and River Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

(iv) Redevelopment Plan for the Central Industrial Redevelopment Project

The Project Site is designated for Light Industrial land uses according to Exhibit No. 1 in the Redevelopment Plan for the Central Industrial Redevelopment Project. Per Section 512.1 of the Redevelopment Plan, the Project is subject to a maximum FAR of 3.0:1 (before required dedications). However, Section 502 of the Redevelopment Plan clarifies conflicts with other superseding plans as follows:

[T]he land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time. 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, based on the Central City North Community Plan, the Project Site's designation for Heavy Industrial uses prevails. Nonetheless, the proposed uses would be consistent with either designation. Furthermore, with approval of the Vesting Zone and Height District Change, the Project Site would be subject to the density restrictions of the

M3-2D-RIO zone. Regardless, the Project is subject to review by the City for conformance with the Redevelopment Plan goals. As detailed in Table 5 of Appendix I of this Draft EIR, the Project would not conflict with the applicable goals of the Redevelopment Plan for the Central Industrial Redevelopment Project adopted for the purpose of avoiding or mitigating an environmental effect.

(v) Citywide Design Guidelines

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

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

To create a more pedestrian-friendly environment and encourage pedestrian activity, the Project would include new and widened sidewalks, crosswalks, street trees, and landscaping. In addition, the Project would provide a pedestrian paseo in the eastern portion of the Project Site that would provide access through the site between Bay Street and Sacramento Street. The pedestrian paseo would be landscaped and activated by various gathering areas, such as an outdoor courtyard that would serve as an open-air “forum” at the end of Bay Street. Furthermore, the Project’s retail and restaurant uses would be located on the ground level and would include storefront glazing, and lobby access to the office/creative office uses would be available from the paseo. The Project’s building entrances and exits, open spaces, and pedestrian walkways would be open and in view of the surrounding site. This would help to maximize visibility and reduce areas of concealment. As such, these Project elements would provide additional pedestrian amenities for the community and provide a safe, comfortable, and accessible pedestrian experience for all. Therefore, the Project would not conflict with Citywide Design Guideline 1.

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

Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right-of-way; and on corner lots, orienting parking as far from the corner as possible.

The Project would prioritize pedestrian access by providing multiple pedestrian access points on Bay Street and Sacramento Street. The Project’s pedestrian paseo would provide gathering space for visitors and tenants while also providing a pedestrian

linkage between Bay Street and Sacramento Street through the Project Site. The pedestrian paseo would be anchored by common open space, street trees, seating areas, and low scale structures to promote an active pedestrian experience on the ground floor. New and widened sidewalks would also be constructed on Bay Street and Sacramento Street with planted trees along these streets, and the Project would add a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue.

As shown in Figure II-5 in Section II, Project Description, of this Draft EIR, vehicular access to the ground level parking areas would be provided via an ingress/egress driveway on Bay Street and two ingress/egress driveways on Sacramento Street. The driveway on Bay Street and the western driveway on Sacramento Street would have two lanes and would provide access to surface parking. The eastern driveway on Sacramento Street would have three lanes and provide access to the subterranean parking levels. Access for trash pickup and other freight vehicles would be provided via a loading dock within the ground level parking area. A proposed drop-off zone on Bay Street would provide a dedicated space for Project employees and patrons arriving via taxi or rideshare services. As detailed in Section IV.K, Transportation, of this Draft EIR, while one of the driveways into the Project Site from Sacramento Street would have a 50-foot reservoir distance which would be less than the minimum 60-foot requirement; given that the Project Site is located at the end of dead-end Sacramento Street, the only traffic on Sacramento Street is local traffic and there is and would be no vehicular traffic passing this driveway. Hence, the 50-foot reservoir distance would not substantially conflict with LADOT Driveway Design Guidelines.

Based on the above, the Project would provide separate pedestrian and vehicular access for safety, and would incorporate vehicular access such that it would not degrade the pedestrian experience. The Project would not conflict with Citywide Design Guideline 2.

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

The Project would activate the ground level by introducing retail/restaurant uses with storefront glazing along the pedestrian paseo. Consistent with Guideline 3, the Project would avoid long blank walls and would ensure that ground floor uses maintain a high degree of transparency and maximize a visual connection to the street. As such, the Project would introduce a human-scale element and visual interest to pedestrians, visitors, and occupants. Common spaces along the pedestrian paseo and within the terrace of the high-rise building would combine social and professional environments that reflect the mixed-use nature of the Project, including a proposed outdoor courtyard that would connect to the paseo at the end of Bay Street that would serve as an open-air “forum.” The terrace would also provide views of the Los Angeles River and surrounding properties.

The Project's height and massing would be consistent with many of the existing and proposed commercial and residential structures in the Arts District and the surrounding vicinity. In particular, the building materials and articulation of the proposed high-rise Building A would be a ten-story building characterized by a warehouse inspired glass and precast façade system for the above-grade levels with unique building elements at grade. Building B, proposed for development in the northwestern portion of the Project Site, would be a smaller one-story building with operable glass façade on Bay Street with precast roof and canopies. Building C, proposed for development in the southeastern portion of the Project Site, would include two stories and face Sacramento Street with more than 20 feet of clear ceiling, potential for large openings in perimeter glazing, and a covered outdoor terrace finished with fluted panels. The one-story electrical enclosure building in the southwestern portion of the Project Site would be wrapped in an artistic shroud. The proposed maximum height of approximately 190.23 feet above lowest grade on-site (Building A) would be similar to other building heights in the vicinity, including the six-story building on the southeast corner of Bay Street and Santa Fe Avenue, located approximately 253 feet west of the Project Site, and the Toy Factory Lofts (six stories) and Biscuit Company Lofts (seven stories) further to the north. Meanwhile, as previously discussed, the proposed one-story and two-story buildings and in particular the pedestrian-oriented storefronts and restaurant uses would maintain a human scale.

As such, the Project would be designed to actively engage with streets and public space and maintain human scale. The Project would not conflict with Citywide Design Guideline 3.

Design Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.

The Project would not conflict with this guideline because it would: (1) provide new and widened sidewalks, crosswalks, street trees and landscaping to create a more pedestrian-friendly environment and encourage pedestrian activity along the Project's Bay Street and Sacramento Street frontages; (2) provide a pedestrian paseo that would be landscaped and activated by various gathering areas to provide a pleasant pedestrian connection through the Project Site; and (3) provide ground floor retail and restaurant uses, storefront glazing, lobby access, pedestrian walkways, and building orientation that maximize the visual and physical pedestrian connection to the adjacent streets and land uses.

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

The Project Site is located in an urbanized area and is currently developed with existing buildings. The Project Site is relatively flat with shrubs and no trees on-site or in the adjacent public right-of-way. The Project would provide street trees and potted plants

that are drought-tolerant and/or of a native tree species. As such, the Project would not conflict with Citywide Design Guideline 8.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would incorporate energy-efficient design methods and technologies, including high performance glazing, cool roof, and optimized insulation levels. The Project would comply with regulatory requirements and LEED Silver or equivalent green building standards. Specific project design features to further support and promote environmental sustainability would include, but would not be limited to: use of daylighting where feasible in the Project to reduce the electrical consumption load and maximize natural light for occupants; energy-efficient lighting, HVAC equipment, and Energy Star-certified appliances; building energy modeling to improve energy performance; and energy efficient building envelope design. Per the current Project plans, the Project would also include the installation of rooftop solar panels above-and-beyond current requirements.²⁹ In addition, 30 percent of the Project's parking spaces would be capable of supporting future EVSE, and 10 percent of spaces would have EV charging stations as required by City of Los Angeles Ordinance 186,485 and Ordinance 186,488. As such, the Project would be configured to lower energy demand and increase the comfort and well-being of users. The Project would not conflict with Citywide Design Guideline 9.

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

As described in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project would implement Low Impact Development (LID) strategies, including either infiltration, stormwater capture and, or High Efficiency Biofiltration/Bioretenion Systems. In addition, the Project would provide street trees and potted plants that are drought-tolerant and/or of a native tree species. Smart irrigation systems with flow sensors and drip tubing delivery systems would be used. As such, the Project would support Guideline 10 by introducing green infrastructure and incorporating stormwater best management practices. The Project would not conflict with Citywide Design Guideline 10.

²⁹ *Building permits applications submitted prior to January 1, 2023 are subject to the requirements of the current version of the California Energy Code Section 110.10 which, given the type, size, and number of stories of the proposed buildings, only requires the reservation of roof space for solar atop the proposed 10-story building. Building permits submitted on or after January 1, 2023 will be subject to the 2022 version of the code which will require the installation of solar panels and a battery.*

Based on the discussion above, the Project would not conflict with the Citywide Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

(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 or impede the General Plan, Central City North Community Plan, LAMC, or other 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) 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, VMTs, 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. Given that the Project Site is currently developed with office, creative office, and light industrial uses and the Project involves similar uses, Project implementation would not result in a fragmented pattern of development. As previously described, the Project is located in the Arts District, where many of the former industrial and warehouse buildings have been redeveloped as live/work units, incubator spaces, and various retail/restaurant uses. Thus, the Project would continue the area trend of re-using industrial lands, while supporting the remaining industrial, warehouse, and commercial uses in the surrounding area. **Therefore, the Project would not displace any industrial uses, and impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts with regard to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, cumulative growth in the Project vicinity includes 72 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. 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 consistency would be less than significant and would not be cumulatively considerable.**

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. Given that the Project Site is currently developed with office, creative office, and light industrial uses and the Project involves similar uses, Project implementation would not result in a fragmented pattern of development. As previously described, the Project is located in the Arts District, where many of the former industrial and warehouse buildings have been redeveloped as live/work units, incubator spaces, and various retail/restaurant uses. Thus, the Project would continue the area trend of re-using industrial lands, while supporting the remaining industrial, warehouse, and commercial uses in the surrounding area. The conversion of industrial land is an economic issue that is not within the scope of CEQA review. While certain 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. **Therefore, cumulative impacts related to displacement of industrial uses would be less than significant and would not be cumulatively considerable.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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