

Land Use Plans Consistency Analysis Tables

### Appendix I

### **Land Use Plans Consistency Analysis Tables**

Table 1 Project Consistency with Applicable Goals of SCAG's 2020–2045 Regional Transportation

#### Plan/Sustainable Communities Strategy Goals Would the Project Conflict? accessibility, No Conflict. Although these goals apply at a regional 2: Improve mobility, reliability, and travel safety for people and goods. Goal 4: Increase person and goods movement

and travel choices within the transportation system.

level, the Project would be developed in an existing urbanized area with an established network of roads and freeways that provide local and regional access, including to the Project Site. The Project Site is currently served by multiple Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system). The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a City-designated transit priority area (TPA) and a Southern California Association of Governments (SCAG) designated High-Quality Transit Area (HQTA). In addition, the Project would provide 78 bicycle parking spaces (28 short-term, 50 long-term) for employees and visitors. The Project would also meet the City Green Building Code Requirements for parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Given the Project's proximity to a variety of transportation options, the Project would improve mobility, accessibility, and overall productivity of the transportation system by providing opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking.

With respect to safety, as discussed in Section IV.K, Transportation, of this Draft EIR, the roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located adjacent to dead-ends on Bay Street and Sacramento Street and is essentially flat. To the east of the dead-ends are the Burlington Northern Santa Fe (BNSF) railway tracks. There is minimal pedestrian activity around the Project Site, and there are no existing pedestrian or bicycle connections nor the opportunity for connections. The Project would improve pedestrian travel safety by: (1) separating pedestrian and vehicular traffic,

Goals	Would the Project Conflict?
	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.
	Sacramento Street.  There are no slopes, curves, landscaping or other barriers that would impede visibility or that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the Los Angeles Fire Department (LAFD), and the Los Angeles Municipal Code (LAMC). The Project would not include any new roads that would result in an increase in hazards due to a design feature. In addition, the Project would not result in incompatible uses as the proposed commercial and office uses are consistent with the developments in the Project would prepare and implement a Construction Management Plan and Worksite Traffic Control Plan to minimize potential impacts to the surrounding area related to construction trucks, construction worker parking, and any possible sidewalk or lane closures and to ensure safe passage for all modes of travel during Project construction (see Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR). In addition, during operation, landscape design will ensure there will be no impediments to visibility of and by vehicles, bicycles and pedestrians. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. Furthermore, as concluded in Section IV.K, Transportation, of this Draft EIR, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Moreover, the Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system. As detailed in Section IV.K, Transportation, of this Draft EIR, Project impacts related to the circulation
	system and vehicle miles traveled (VMT) would be less than significant with mitigation. 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, education and incentive programs, improvements to

Goals	Would the Project Conflict?
	bicycle and pedestrian infrastructure. Therefore, the Project would not conflict with these goals.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	No Conflict. Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed in Section IV.K, Transportation, of this Draft EIR, the Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system; VMT (with incorporation of Mitigation Measure TR-MM-1); and hazardous geometric design features. As discussed above, during construction per Project Design Feature TR-PDF-1, a Construction Management Plan and Worksite Traffic Control Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. During operation, the Project would not substantially increase hazards due to a geometric design feature or incompatible use.
	The Project would also enhance the preservation, security, and resilience of the regional transportation system by providing improvements to Bay Street and Sacramento Street. 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 the Mobility Plan 2035. On Sacramento Street, per the 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 the Mobility Plan 2035.
	It is noted that LADOT has labeled Bay Street as an industrial collector which requires more ROW. The

Goals	Would the Project Conflict?
	Project is requesting street standard deviations as part of the Project entitlements through the tract map to reflect industrial street standards. With approval of these street standard deviations, the Project would be consistent with applicable street dedication/ROW requirements.
	Lastly, the Project would also add a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue.
	Therefore, the Project would not adversely affect the security and preservation of the regional transportation system, and the Project would not conflict with this goal.
Goal 5: Reduce greenhouse gas emissions and improve air quality.  Goal 6: Support healthy and equitable communities.  Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	No Conflict. As evaluated in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-thansignificant impacts related to air quality during construction and operation. As evaluated in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR Project impacts with respect to GHG emissions would be less than significant. The Project would comply with regulatory requirements and U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (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 and heating, ventilation and air conditioning (HVAC) equipment; building energy modeling to improve energy performance; and energy efficient building envelope design, including high performance glazing, cool roof, and optimized insulation levels. The Project would also include the installation of solar panels as required by Title 24 which would reduce GHG emissions associated with electricity production. While these measures are intended to reduce GHG emissions, they would also improve air quality.  The Project would be developed within an existing urbanized area that provides an established transportation network of roads, freeways, and transit that provide local and regional access to the area, including the Project Site. The Project Site is located in a HQTA and currently served by multiple Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system). In addition, the Project would provide 78 bicycle parking spaces (28 short-term, 50 long-term) for employees and visitors. Furthermore, the Project Site by siting retail and restaurant uses on

Goals	Would the Project Conflict?
	providing a pedestrian paseo system with connections to Bay Street and Sacramento Street, and providing landscaping and streetscape improvements. 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. As such, the Project would support healthy and equitable communities by improving air quality and encouraging active transportation. The Project would implement a TDM program pursuant to Mitigation Measure TR-MM-1 to reduce VMT and dependency on single-occupancy vehicles. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
<b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that results in more efficient travel.	No Conflict. As discussed above, the Project would promote non-automobile travel and reduce the use of single-occupant vehicle trips by incorporating a TDM program (in accordance with Mitigation Measure TR-MM-1) and by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment. The Project would also provide parking spaces that are equipped with EV charging stations and additional spaces capable of supporting future EVSE. Therefore, the Project would not conflict with this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	No Conflict. As discussed in the Initial Study included as Appendix I of this Draft EIR, the Project Site is located in an urbanized area and is currently occupied by three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. There are no trees on the property or within the public right-of-way. No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Therefore, the Project would not conflict with this goal.
Source: Eyestone Environmental, 2022.	

Table 2
Project Consistency with Applicable Goals, Objectives, and Policies of the General Plan
Framework Element

### Goal/Objective/Policy

#### Would the Project Conflict?

#### **Land Use Chapter**

Section 2. Issue One: Distribution of Land Use

Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.

**Objective 3.1:** Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

**Policy 3.1.2:** Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.

**Policy 3.1.3:** Identify areas for establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities include a citywide linear network of parklands and trails, neighborhood parks, and public open spaces.

**Objective 3.2:** Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a

No Conflict. The Project involves construction of a commercial mixed-use development with 217,189 square feet of creative office space and approximately 5,000 square feet of retail and restaurant space. The diversity of uses on the Project Site would support the employment and commercial needs of existing and future residents, businesses, and visitors in and around the Arts District. In addition, the Project would incorporate sustainability features, landscaping, and new sidewalks and access points to improve pedestrian travel. The Project Site is located in a City-designated TPA, a SCAG-designated HQTA, and in close proximity to many bus transit lines, rail lines, and shuttle services operated by the Los Angeles Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and other transit providers. As such, the Project would support the needs of existing and future residents, businesses, and visitors in a transit-oriented mixed-use neighborhood of the City.

No Conflict. While this policy refers to the citywide provision of public infrastructure, as discussed in Section IV.J.1, Public Services—Fire Protection; Section IV.J.2, Public Services—Police Protection; Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure; and Section IV.M.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project Site would have capacity to serve the Project.

**No Conflict.** The Project would provide a publicly-accessible pedestrian paseo through the Project Site to connect Bay Street and Sacramento Street. This paseo would include landscaping and various gathering spaces 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 Project's public open space would serve the needs of existing and future residents in the area.. Furthermore, the proposed high rise building would feature an outdoor terrace on Level 10 for the Project's office tenants which would reduce Project demand for public park space. Hence, the Project would not conflict with this policy.

**No Conflict.** The Project Site is located in a TPA and HQTA and thus is in an area well-served by public transit. Public transit service in the vicinity is currently provided by

#### Goal/Objective/Policy

### reduction of vehicle trips, vehicle miles traveled, and air pollution.

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

### Would the Project Conflict?

multiple local and regional bus lines, several of which provide connections to Downtown subway stations including Pershing Square and 7th Street/Metro Center. Specifically, public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations, including the Los Angeles County Metropolitan Transit Authority (Metro) B and D (formerly Red and Purple) Lines Pershing Square Station and the Metro B, D, A, and E (formerly Red, Purple, Blue, and Expo) Lines 7th Street/Metro Center Station. particular, Metro provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, approximately 580 feet northwest of the Project Site. A total of two other bus lines, local lines Metro 18, and Metro 62 have stops within a quarter mile of the Project Site. Metro Local Line 66 and Metro Rapid Line 720 currently serve the Project Site via stops located within approximately a half mile along Alameda Street/7th Street, and Olympic Boulevard. Also, the Greyhound Bus Terminal is located northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. Additionally, these public bus routes provide access to other mass transit opportunities including Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system).

The Project would also include a publicly-accessible pedestrian paseo through the Project Site to connect Bay Street and Sacramento Street, and the street frontages would be planted with street trees, thus improving the pedestrian environment and promoting walkability in the Project vicinity. The Project would also install a sidewalk along Bay Street where none exists today, widen the sidewalk on Sacramento Street, and add a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue.

The Project would also provide 78 bicycle parking spaces on-site as well as bicycle lockers and showers.

Therefore, the Project would provide opportunities for the use of alternative modes of transportation, including access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, VMT, and air pollution.

Based on the above, the Project would not conflict with this objective and policy.

### Goal/Objective/Policy

### Would the Project Conflict?

**Policy 3.2.4:** Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.

No Conflict. The Project Site is located near the southern edge of the Arts District and is currently designated for Heavy Industrial uses per the Central City North Community Plan. The Arts District was originally characterized by warehouses and industrial uses and has undergone substantial change over the last decade, resulting in substantial residential and commercial redevelopment. Former industrial and warehouse buildings have been redeveloped as residential live/work units, incubator spaces, art galleries, restaurants, drinking establishments, breweries, coffee shops, and retail shops. The immediate Project vicinity is currently developed with a mix of light industrial, office, commercial, and residential uses.

The Project would develop a creative office campus that would be comprised of a 10-story commercial high-rise building, a two-story commercial building, a one-story commercial building, and a one-story electrical enclosure. The Project would include a total of approximately 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant space. The Project would increase the height, density, and mass of on-site structures as compared to existing conditions and would be generally consistent with the existing and proposed developments in the surrounding area. As such, the Project would be generally consistent with the scale and character of the surrounding area.

**Objective 3.3:** Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.

No Conflict. As detailed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Project's employment growth would be well within SCAG's projections for the Subregion, which serve as the basis for the General Plan Framework Element's (General Plan Framework's) demographics projections and planned provisions of transportation and utility infrastructure and public services. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. As discussed in Objective 3.2 above, the Project would be located in an area well-served by public transit, including multiple local and regional Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system). In addition, as discussed in Policy 3.1.2 above, agencies providing public services and utilities to the Project Site would have capacity to serve the Project.

Objective 3.4: Encourage new multi-family

No Conflict. The Project includes creative office space

### Goal/Objective/Policy

#### Would the Project Conflict?

residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

and retail/restaurant uses that would be compatible with existing and proposed uses within the surrounding area, including the Arts District. As discussed for Objective 3.2, the Project Site and vicinity are well served by transit. Refer to Policy 3.2.4 for further discussion of the Project's compatibility, in terms of both land use and design, with the surrounding area. Overall, the Project would not conflict with this objective.

#### **Land Use Chapter**

Section 3. Issue Two: Uses, Density, Characteristics-Industrial

**Policy 3.14.3:** Promote the re-use of industrial corridors for small scale incubator industries.

**Policy 3.14.4:** Limit the introduction of new commercial and other non-industrial uses in the existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.

No Conflict. 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.

**Goal 3L:** Districts that promote pedestrian activity and provide a quality experience for the City's residents.

**Objective 3.16:** Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

No Conflict. As previously discussed, the Project includes a publicly-accessible pedestrian paseo through the Project Site to connect Bay Street and Sacramento Street. The pedestrian paseo would include landscaping and various gathering spaces, and the street frontages would be planted with street trees, thus improving the pedestrian environment and promoting walkability in the Project vicinity. 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 Project would also install a sidewalk along Bay Street where none exists today, widen the sidewalk on Sacramento Street, and add a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue. Therefore, the Project would not conflict with this goal and objective.

**Objective 3.17:** Maintain significant historic and architectural districts while allowing for the development of economically viable uses.

**No Conflict.** As discussed in Section IV.B, Cultural Resources, of the Draft EIR, the Project Site does not include any existing historic resources but is located in close proximity to one designated historical resource, the Seventh Street Bridge, as well as three nearby buildings identified as eligible for historic designation (and therefore treated herein as historical resources). Based on the Historical Resources Report included as Appendix I of this Draft EIR, the Project would not directly or indirectly affect the significance of these or any historical resources.

Goal/Objective/Policy	Would the Project Conflict?
Goal/Objective/Folicy	Therefore, the Project would not conflict with this objective.
III.	
Urban Form and Neighborhood Design Chap	
Goal 5A: A liveable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.	No Conflict. The Project would introduce a new creative office campus with retail/restaurant uses. The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks fully developed pedestrian infrastructure, by constructing new or widened sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrances for the creative office tenants along the pedestrian paseo. The pedestrian paseo would provide access through the Project Site from Bay Street and Sacramento Street. The pedestrian paseo would also incorporate various gathering zones that would be dotted with potted plants, such as an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street. As such, the Project development would be attractive to future investment and would contribute to a transit-oriented mixed-use neighborhood at both the local and citywide scale when considered with other mixed-use and commercial developments in the area. Therefore, the Project would not conflict with this goal.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	No Conflict. The Project is located in a highly urbanized area near the southern edge of the Arts District, an industrial area that continues to be redeveloped with a mix of live/work, residential, commercial, and creative office uses. Buildings in the Project vicinity range from older low-rise industrial buildings to new high-rise mixed-use buildings. The Project would provide opportunities for new commercial and creative office development and improve the area by providing newly constructed or widened sidewalks, landscaping, and a pedestrian paseo. Proposed retail and restaurant uses would be located on the ground level to enhance pedestrian activity on and adjacent to the Project Site. The architecture of the Project would draw from elements of the surrounding neighborhood. Open space and landscaping within the Project Site would include ground level gathering spaces and a pedestrian paseo connecting Bay and Sacramento Streets through the Project Site. The pedestrian paseo would also incorporate various gathering zones including an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street, that would be dotted with potted plants. Additionally, the proposed high-rise building would include an outdoor terrace on Level 10 for Project office employees which would reduce the demand for public parks and recreational facilities. Overall, the uses and improvements proposed under the Project would

Goal/Objective/Policy	Would the Project Conflict?
	enhance the quality of the Project vicinity and public realm.
<b>Policy 5.8.4:</b> Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	No Conflict. Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project buildings and other signage in the Project area. Proposed signage would include wall mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and corridors. All proposed signage would be designed in conformance to applicable LAMC requirements. Therefore, the Project would not conflict with this policy.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	No Conflict. As discussed in Section IV.J.2, Public Services—Police Protection, the Project would incorporate Project Design Features POL-PDF-1 through POL-PDF-6 to promote individual and community safety on the Project Site. The Project would provide temporary security measures including security fencing, lighting, and locked entry during construction in accordance with Project Design Feature POL-PDF-1. In accordance with Project Design Features POL-PDF-2 through POL-PDF-4, the Project would include a closed-circuit security camera system; keycard entry for the buildings and parking areas; proper lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; and sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. As specified by Project Design Feature POL-PDF-5, Project entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways would be designed to be open and in view of surrounding sites. Furthermore, the Applicant would submit to the Los Angeles Police Department (LAPD) a diagram of the Project Site showing access routes and other information that might facilitate police response as required by Project Design Feature POL-PDF-6. Therefore, the Project would not conflict with this objective.

### Open Space and Conservation Chapter

**Goal 6A:** An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.

**Policy 6.3.3.** Utilize development standards to promote development of public open space that is visible, thereby helping to keep such

No Conflict. While this is a citywide/regional goal, the Project would not encroach upon the City's existing open space. 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 including an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street. The streets along the Project Site would be planted with street trees

Goal/Objective/Policy	Would the Project Conflict?
spaces and facilities as safe as possible.	along the Project frontage. The high-rise building would also feature an outdoor terrace on Level 10 of the proposed high-rise building. The terrace would provide views to the nearby Downtown skyscape and would be landscaped with potted plants. See Objective 5.9 regarding the project design features that would be implemented to promote individual and community safety on the Project Site. As such, the Project would not conflict with this goal and policy.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	No Conflict. The Project involves the development of 217,189 square feet of creative office space and approximately 5,000 square feet of retail and restaurant space. The proposed uses would generate new employment opportunities and support the commercial needs of existing and future residents, businesses, and visitors in and around the Arts District. The Project also would encourage new pedestrian activity along and between the segments of Bay Street and Sacramento Street surrounding the Project Site through the introduction of the paseo, new or widened sidewalks and access points, and landscaping and streetscaping. The Project's location would also encourage site employees to patronize the influx of local businesses located nearby and in the broader Arts District. In addition, as previously detailed, the Project Site would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	No Conflict. The Project would involve the development of 217,189 square feet of creative office space and approximately 5,000 square feet of retail and restaurant space in an area well-served by public transit. As discussed in Objective 3.2 above, the Project is served by multiple Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system).
Infrastructure and Public Services Chapter	1
<b>Goal 9A:</b> Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.	<b>No Conflict.</b> While this is a citywide goal, based on sewage generation factors established by City's Bureau of Engineering, the Project would generate a net of approximately 32,499 gallons per day (gpd) of wastewater, or approximately 0.032 million gallons per day (mgd), upon completion, as discussed in Section VI, Other CEQA

Goal/Objective/Policy	Would the Project Conflict?
	Considerations, of this Draft EIR. The Project's average daily wastewater flow of 0.032 mgd would represent approximately 0.018 percent of the available capacity of 175 mgd at the Hyperion Treatment Plant. In addition, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer main adjacent to the Project Site. Therefore, there is adequate wastewater collection and treatment capacity to service the Project, and the Project would not conflict with this goal.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. Wastewater generated by the Project 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 typical but potentially hazardous materials, including those 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 not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality. Furthermore, as discussed in Section IV.L.M, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would include water conservation features to reduce water usage which would in turn reduce wastewater flows. Therefore, the Project would not conflict with this policy.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.  Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	No Conflict. As discussed below in Policy 5.5 of Mobility Plan 2035, the Project would implement best management practices (BMPs) to minimize the discharge of pollutants in stormwater runoff during construction. During operation, the Project would implement Low Impact Development (LID) strategies to manage stormwater runoff in accordance with the current City of Los Angeles LID Ordinance requirements, and implementation of Project Design Feature HYD-PDF-1 would provide an on-site stormwater runoff detention to avoid increasing the runoff flow from the Project Site to the Sacramento Street drain.
Goal 9C: Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.  Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to	<b>No Conflict.</b> As evaluated in Section IV.L.M, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, based on the Los Angeles Department of Water and Power's (LADWP's) demand projections provided in its 2015 Urban Water Management Plan (UWMP), LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of

Goal/Objective/Policy	Would the Project Conflict?
support planned development.	its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Thus, the Project would not conflict with this goal and objective.
Goal 9F: Adequate collection, transfer and disposal of mixed solid waste—the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner than minimizes adverse environmental impacts.	<b>No Conflict.</b> As discussed in the Initial Study, which is included as Appendix A of this Draft EIR, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. The Project would contract with a private trash hauler that would remove the waste from the building, and the Project would have adequate capacity to handle all trash collection. Therefore, the Project would not conflict with this goal.
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	No Conflict. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to approval by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties. Therefore, the Project would not conflict with this goal.

Table 3
Project Consistency with Applicable Policies of Mobility Plan 2035

#### **Policy Would the Project Conflict? Policy 1.6:** Design detour facilities to provide No Conflict. As identified in Project Design Feature TRsafe passage for all modes of travel during PDF-1 in Section IV.K, Transportation, of this Draft EIR, times of construction. the Project would implement a Construction Management Plan and Worksite Traffic Control Plan to minimize potential impacts to the surrounding area related to construction trucks, construction worker parking, and any possible sidewalk or lane closures and to ensure safe passage for all modes of travel during Project construction. In particular, the Worksite Traffic Control Plan would route vehicular traffic, bicyclists, and pedestrians around any parking area or sidewalk closures; identify sidewalk or lane closures, traffic control measures, signs, delineators, and flagmen; and establish work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. As such, the Project would ensure that access would remain unobstructed for uses in proximity to the Project Site during construction. Therefore, the Project would not conflict with this policy. The Project would retain the current Policy 2.1: Adaptive Reuse of Streets-No Conflict. functionality of Bay Street and Sacramento Streets as Design, plan, and operate streets to serve multiple purposes and provide flexibility in Collector Streets. The Project would add a sidewalk and a design to adapt to future demands. passenger loading zone to Bay Street and widen the sidewalk on Sacramento Street. Therefore, the Project would not conflict with this policy. Policy 2.3: Recognize walking as a No Conflict. The Project would encourage pedestrian activity on and around the Project Site by creating more component of every trip, and ensure high quality pedestrian access in all site planning pedestrian-scaled Project frontages along Bay Street and and public right-of-way modifications to Sacramento Street. As discussed above, the Project provide a safe and comfortable walking would add a sidewalk to Bay Street, where none exists environment. today, widen the sidewalk on Sacramento Street, and add a new traffic signal with crosswalks at Sacramento Street & Santa Fe Avenue. Commercial uses and storefront glazing would be placed at the ground level, and a lobby entrance for creative office tenants would be located on the ground level to provide pedestrian access. The Project would also include a pedestrian paseo to allow access through the Project Site and between Bay Street and Sacramento Street. 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. In addition, the Project Site's proximity to a variety of public transit options and nearby commercial and office uses, and the Project's implementation of a TDM program, would promote walkability and reduce VMT. Lastly, the Project would separate pedestrian and vehicular traffic to provide a safe and comfortable walking environment by providing separate pedestrian and vehicular access to and

circulation within the Project Site. Therefore, the Project

Policy	Would the Project Conflict?
	would not conflict with this policy.
Policy 2.4: Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets.	No Conflict. The Project is located adjacent to Bay Street and Sacramento Street, which are both Collector Streets and, for the block on which the Project is located, serve only adjacent properties. There is no through traffic on the street as the Project is located at the terminus of both dead-end streets. Due to their location, these streets are slow speed streets and local serving. The Project would not change these characteristics and the streets would remain consistent with Policy 2.4. In addition, the Project Site is not located adjacent to street segments of the Neighborhood Enhanced Network. The nearest segment of the Neighborhood Enhanced Network is along Santa Fe Avenue. Therefore, the Project would not conflict with this policy.
Policy 2.5: Transit Network—Improve the performance and reliability of existing and future bus service.	<b>No Conflict.</b> While this is a citywide policy, the Project would not conflict with its implementation. The Project Site is not immediately adjacent to any Transit Enhanced Streets. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. As such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Therefore, the Project would not conflict with this policy.
Policy 2.6: Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	No Conflict. While this is a Citywide Policy, the Project would support its implementation. Currently, there are no bicycle lanes in the study area. However, per Mobility Plan 2035, 7th Street to the north of the Project Site is designated with Tier 2 bicycle lanes. Similarly, Olympic Blvd to the south of the Project Site is designated with Tier 3 bicycle lanes. The designated Bicycle Path Network segment nearest to the Project Site is the Central LA River Path located immediately east of the Project Site. The Project Site is also located approximately 0.5 mile south of the 6th Street Viaduct project that is currently under construction and 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. Furthermore, during operation, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. Bicycle parking requirements per LAMC Section 12.21-A,16 include short-term and long-term parking. Short-term bicycle parking would be available on the ground floor, and long-term bicycle parking would be enclosed from inclement weather and secured from the general public.

Policy	Would the Project Conflict?
	The Project would comply with the LAMC and would provide 78 bicycle parking spaces, including 28 short-term spaces and 50 long-term spaces. The Project would also provide bicycle lockers and showers on-site. Therefore, the Project would not conflict with this policy.
Policy 2.10: Loading Areas—Facilitate the provision of adequate on and off-street loading areas.	No Conflict. The Project would provide an on-street passenger loading zone directly adjacent to building entrances on Bay Street, which is a dead-end street. As such, passenger loading activity would likely have a minimal impact on the surrounding street network. The Project would also provide an onsite truck loading area accessible from the Bay Street and Sacramento Street driveways. As such, truck loading activities would result in a minimal impact on the surrounding street network and the loading docks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with this policy.
Policy 2.17: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	No Conflict. 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 the Mobility Plan 2035. On Sacramento Street, per the 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 the Mobility Plan 2035. Therefore, the Project would not conflict with this policy.
Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	No Conflict. The Project would promote this policy by providing adequate vehicular, pedestrian, and bicycle access on the Project Site. The Project would provide a total of 711 vehicular parking spaces and 78 bicycle parking spaces. The Project would provide pedestrian access to the Project Site via new and improved sidewalks along Bay Street and Sacramento Street. Access to the ground floor retail and restaurant spaces would be provided via the sidewalks and the proposed pedestrian

Policy	Would the Project Conflict?
	paseo along the east side of the Project Site. Access to the high-rise building would be provided via a lobby accessible from Bay Street to the north, Sacramento Street to the south, and the proposed pedestrian paseo. In addition, the Project would be located in an area well-served by transit including multiple Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system). 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.
Policy 3.2: People with Disabilities— Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	<b>No Conflict.</b> The Project would design sidewalks and passenger loading areas in accordance with LADOT and Americans with Disabilities Act (ADA) standards. Therefore, the Project would not conflict with this policy.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	<b>No Conflict.</b> The Project would promote equitable land use decisions that result in fewer vehicle trips by: providing a mix of creative office, retail, and restaurant space in proximity to jobs (including those offered on-site), destinations in and around the Arts District, and other neighborhood services; and providing these uses on an urban infill site within a TPA, HQTA, and in an area well-served by public transit. 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. Therefore, the Project would not conflict with this policy.
	No Conflict. The Project area is well-served by public transit. As discussed in Objective 3.2 above, the Project is served by multiple Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system). Thus, employees and visitors of the Project would be well-served by affordable, efficient, convenient, and attractive transit services. Therefore, the Project would not conflict with this policy.
<b>Policy 3.5:</b> Multi-Modal Features—Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to	No Conflict. There is no transit service on Bay Street or Sacramento Street. The nearest transit service is on Santa Fe Avenue. The Project would add a new sidewalk on Bay Street adjacent to the Project, and widen the sidewalk on Sacramento Street, and add a new traffic

Policy	Would the Project Conflict?
maximize multi-modal connectivity and access for transit riders.	signal with crosswalks at Sacramento Street and Santa Fe Avenue, which would facilitate pedestrian access to transit service on Santa Fe Avenue. Therefore, the Project would not conflict with this policy.
<b>Policy 3.8:</b> Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	<b>No Conflict.</b> The Project would require and provide 78 bicycle parking spaces (28 short-term and 50 long-term) on the Project Site. The Project would also provide bicycle lockers and showers on-site. Therefore, the Project would not conflict with this policy.
<b>Policy 3.10:</b> Cul-de-sacs—Discourage the use of cul-de-sacs that do not provide access for active transportation options.	No Conflict. The Project Site is adjacent to the end of dead-end streets on both Bay Street and Sacramento Street. The Project would not create a cul-de-sac on either street. This policy would not be applicable to the Project as immediately east of the Project Site are railroad tracks and the Los Angeles River, and there are no current pedestrian or bicycle connections nor the opportunity for any future connections. Therefore, the Project would not conflict with this policy.
Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	No Conflict. As discussed in Section IV.K, Transportation, of this Draft EIR, 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, education and incentive programs, and improvements to bicycle and pedestrian infrastructure, which would be beneficial to traffic flow, transit service, pedestrian circulation, and overall mobility in the Project area. Therefore, the Project would not conflict with this policy.
Policy 4.13: Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives.	No Conflict. The objective of this policy is to balance parking supply with other transportation and land use objectives. The explanatory discussion of this this policy in the Mobility Plan 2035 states that an oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multi-modal transportation system, an abundance of free parking incentivizes automobile trips and makes alternative modes of transportation less attractive, and that large parking lots consume land that could be used for other valuable uses and discourage walking by increasing the distance between services and facilities. The Project does not conflict with the explanatory discussion of this policy in the Mobility Plan 2035 that discourages utilizing land for parking that could have been used for other valuable uses since all parking will be integrated into the project and not located in a large lot. Moreover, employees and visitors will have to pay for parking; therefore, the Project does not

Policy	Would the Project Conflict?
	conflict with the explanatory discussion of this policy in the Mobility Plan 2035 regarding the abundance of free parking. While the Project would include 711 parking spaces in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling, and would implement a TDM plan to promote multi-modal transportation. Furthermore, the Project would be consistent with the applicable goals and objectives of the SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to locate jobs and housing in infill locations served by public transportation and facilitating active transportation and TDM. Therefore, the Project would not undermine broader regional goals of creating vibrant public spaces and a robust multi-modal transportation system and would therefore balance the Project's parking supply with other transportation and land use objectives. The Project is consistent with the overall intent of Policy 4.13 and the Mobility Plan 2035. Furthermore, Policy 4.13 is intended to implement broader regional goals, not to mitigate an environmental effect. Therefore, regardless of the Project's consistency with Policy 4.13, the Project's amount of parking would not conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. The Project would provide a mix of creative offices and retail and restaurant space, which would provide opportunities for people to visit and work in the Project vicinity. As discussed above in Mobility Plan 2035 Policy 2.3, the Project would encourage walking and enhance pedestrian activity on and around the Project Site by siting retail and restaurant uses on the ground level; providing a paseo that connects Bay Street and Sacramento Street through the Project Site; and providing streetscape improvements. The Project would also support bicycling as a mode of transportation by providing 78 bicycle parking spaces and related amenities. In addition, as discussed above in Mobility Plan 2035 Policy

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.

Policy	Would the Project Conflict?
	4.8, the Project would implement a TDM Program that would promote non-automobile travel and reduce the use of single-occupant vehicle trips. Furthermore, the Project Site's proximity to a variety of public transit options would promote walkability and alternative transportation. Therefore, the Project would support a reduction of VMT per capita, and the Project would not conflict with this policy.
<b>Policy 5.4:</b> Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	No Conflict. While this policy represents a broad based goal relative to fuel sources, technologies, and infrastructure, the Project would facilitate the use of alternative-fuel, low-emitting, and fuel-efficient vehicles by: (1) developing urban density within a TPA/HQTA and in close proximity to transit; (2) including TDM measures that incentivize alternative transportation modes; and (3) providing parking spaces that are equipped with EV charging stations and additional spaces capable of supporting future EVSE. Therefore, the Project would not conflict with this policy.
Policy 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	No Conflict. As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) during construction as required under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The Project would implement BMPs, including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would implement LID strategies, including either infiltration, stormwater capture and, or High Efficiency Biofiltration/Bioretention Systems in accordance with the current City of Los Angeles LID Ordinance requirements. Furthermore, to avoid increasing the runoff flow from the Project Site to the Sacramento Street drain, the Project would implement Project Design Feature HYD-PDF-1 to provide an on-site stormwater runoff detention system. Thus, the Project would maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way. Therefore, the Project would not conflict with this policy.
Source: Eyestone Environmental, 2022.	

Table 4 Project Consistency with Applicable Objectives and Policies of the Central City North

### **Community Plan**

#### Commercial

Policy 2-2.2: New development needs to add to and enhance the existing pedestrian street

Objective/Policy

#### Would the Project Conflict?

No Conflict. Under existing conditions, no sidewalk exists adjacent to the Project Site on Bay Street, and limited ornamental landscaping surrounds the site. The Project would enhance pedestrian activity within and around the Project Site by providing new sidewalks along Bay Street and widened sidewalks along Sacramento Street, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. The paseo would allow pedestrians to cross the Project Site between Bay Street and Sacramento Street and would include landscaped planters and various gathering areas including an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street. In addition, as the Arts District is transitioning into a predominantly mixed-use area, development of the Project would further enhance pedestrian connections in the area and within the public realm that are linked to nearby residential and commercial developments. Furthermore, the Project would add to and enhance the existing pedestrian street activity by constructing a new traffic signal with crosswalks at Sacramento Street and Santa Fe Avenue. The Project Site's proximity to various public transit options and nearby commercial and offices uses would also promote walkability. The Project would not conflict with this policy.

#### Industrial

**Policy 3-1.2:** Adequate compatibility should be achieved through design treatments, compliance with environmental protections standards and health and safety requirements for industrial uses where they adjoin neighborhoods and commercial uses.

Policy 3-1.3: Require that any proposed development be designed to enhance and be compatible with adjacent development.

No Conflict. As described in Section II. Project Description, of this Draft EIR, the Project would be designed to convey an industrial architecture that draws from elements of the surrounding neighborhood. Project's use of building materials such as glass, masonry, and concrete would also blend with the Arts District's industrial context. Further, the Project would continue the area trend of re-using industrial lands, while remaining compatible with the industrial, warehouse, commercial, and residential uses in the surrounding area. Therefore, the Project would not conflict with these policies.

#### **Police Protection**

Policy 8-1.1: Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.

No Conflict. As discussed in in Section IV.J.2, Public Services—Police Protection, of this Draft EIR, the LAPD was consulted during preparation of this Draft EIR. In addition, in accordance with Project Design Feature POL-PDF-6, prior to the issuance of a certificate of occupancy, a diagram of the Project Site will be submitted to the LAPD's Newton Area Commanding Officer that includes access routes and any additional information that might facilitate police response. See Objective 5.9 in Table 2 above regarding additional

### Table 4 (Continued) Project Consistency with Applicable Objectives and Policies of the Central City North Community Plan

Objective/Policy	Would the Project Conflict?
	Project Design Features that would be implemented to promote individual and community safety on the Project Site. Therefore, the Project would not conflict with this policy.
Policy 8-2.2: Insure that landscaping around buildings be placed so as not to impede visibility.	<b>No Conflict.</b> The Project would be designed with landscaping that would not impede visibility, with the detailed Project plans to undergo review by multiple City departments to ensure compliance with City line-of-site requirements. Therefore, the Project would not conflict with this policy.
Policy 8-2.3: Insure adequate lighting around residential, commercial, and industrial buildings in order to improve security.	No Conflict. As described in Section II, Project Description, of this Draft EIR, Project lighting would include low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. As such, the Project would include adequate lighting to improve security within the Project Site. Therefore, the Project would not conflict with this policy.

#### Fire Protection

**Policy 9-1.1:** Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

**No Conflict.** As provided in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, the LAFD was consulted during preparation of this Draft EIR. In addition, compliance with applicable Building and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. Therefore, the Project would not conflict with this policy.

#### **Transportation**

**Goal 12:** Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips.

**Objective 12-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

No Conflict. The Project would construct a new commercial mixed-use development in an area well-served by public transit. The Project would also provide 78 bicycle parking spaces within the Project Site to serve the proposed uses, along with bicycle lockers and showers. In addition, the Project would encourage walking and enhance pedestrian activity on and around the Project Site by siting retail and restaurant uses on the ground level, constructing new and widened sidewalks, providing an extensive pedestrian paseo system with connections to Bay Street and Sacramento Street, and providing landscaping and streetscape improvements. Furthermore, as detailed in Section IV.K, Transportation, of this Draft EIR, the Project would implement a TDM Program

## Table 4 (Continued) Project Consistency with Applicable Objectives and Policies of the Central City North Community Plan

Objective/Policy	Would the Project Conflict?
	(detailed in Mitigation Measure TR-MM-1) to promote non- automobile travel and reduce the use of single-occupant vehicle trips. As such, the Project would encourage the use of alternative modes of transportation to reduce vehicular trips and maximize vehicle occupancy. Therefore, the Project would not conflict with this goal and objective.
Policy 12-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.).  Policy 12-1.3: Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	<b>No Conflict.</b> As detailed in Section IV.K, Transportation, of this Draft EIR, the Project would implement a TDM Program (detailed in Mitigation Measure TR-MM-1) 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, education and incentive programs, and improvements to bicycle and pedestrian infrastructure. Therefore, the Project would not conflict with these policies.
<b>Policy 12-1.4:</b> TDM measures in Central City North should be consistent with City policy.	
Non-Motorized Transportation	
Goal 13: A system of safe, efficient and attractive bicycle and pedestrian facilities.  Policy 13.1.4: Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.	<b>No Conflict.</b> As previously discussed, the Project would provide a total of 78 bicycle parking spaces (28 short-term, 50 long-term) in accordance with LAMC requirements. The Project would also provide bicycle lockers and showers onsite. The Project's paseo would allow pedestrians to access Bay and Sacramento Streets, and the new sidewalks and crosswalks would provide pedestrians with improved walking conditions. Therefore, the Project would not conflict with this goal and policy.
Historic and Cultural Resources	
<b>Objective 17-1:</b> Ensure that the Community's historically significant resources are protected, preserved, and/or enhanced.	<b>No Conflict.</b> As discussed in Section IV.B, Cultural Resources, of this Draft EIR, no historic resources are located within the Project Site, and the Project would not result in impacts to historic resources. Therefore, the Project would not conflict with this objective.
Source: Eyestone Environmental, 2022.	

Table 5
Project Consistency with Applicable Goals of the Redevelopment Plan for the Central Industrial Redevelopment Project

Cools	Would the Project Conflict?
Goals	Would the Project Conflict?
1. A high quality of life for those who live and work in the Project Area.	No Conflict. The Project involves the development of 217,189 square feet of creative office space and approximately 5,000 square feet of retail and restaurant space. The Project Site is located near the southern edge of the Arts District, which has experienced residential and commercial redevelopment over the past decade. Former industrial and warehouse buildings continue to be converted to commercial uses and live/work spaces. The Project vicinity is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. The Project is served by multiple Metro public bus lines that provide not only widespread service in the City but also access to other mass transit options such as Metro's light rail system and the nearby Greyhound Bus Terminal (a private bus system). The Project would improve the quality of life for employees and visitors by constructing new sidewalks, adding street trees, and providing retail and restaurant spaces at the ground level. The Project would also provide a ground-level pedestrian paseo system with potted plants, gathering areas including an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street, and access through the Project Site between Bay Street and Sacramento Street. In addition, the proposed high-rise building would include an outdoor terrace on Level 10 for office tenants. Thus, the Project would provide a range of employment opportunities, access to local retail and restaurant uses, and access to walkable space and nearby transit, all of which would provide a high quality of life for future residents to both live and work in the Project vicinity. Hence, the Project would not conflict with this goal.
2. Elimination of conditions of blight and deterioration within the Project Area, and prevention of the establishment of new blight through the removal of structures, removal of incompatible uses, rehabilitation of deteriorated structures and structures requiring modernization for appropriate use, and redevelopment of underutilized and vacant parcels, where appropriate.	No Conflict. Many properties in the Project vicinity are underutilized and in need of redevelopment or revitalization. The Project would improve upon existing conditions at the Project Site by introducing new modern construction with a mix of creative offices and retail and restaurant uses; constructing new sidewalks and a pedestrian paseo; and increasing the density of on-site uses while maintaining the industrial character of the vicinity through architectural design. Therefore, the Project would not conflict with this goal.
<b>12.</b> Accessible businesses, residences, and other land uses via public and semi-public transportation that is affordable to employees, residences, and visitors to promote jobs, businesses, and housing opportunities.	No Conflict. The Project would introduce creative office, retail, and restaurant space in an area well-served by public transit. Multiple public bus lines providing connections to Downtown subway stations, including Pershing Square and 7th Street/Metro Center, operate in the vicinity of the Project Site. Specifically, Metro provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, approximately 580 feet northwest of the Project Site. A total of two other bus lines, local lines Metro

# Table 5 (Continued) Project Consistency with Applicable Goals of the Redevelopment Plan for the Central Industrial Redevelopment Project

Goals	Would the Project Conflict?
	18, and Metro 62 have stops within a quarter mile of the Project Site. Metro Local Line 66 and Metro Rapid Line 720 currently serve the Project Site via stops located within approximately a half mile along Alameda Street/7th Street, and Olympic Boulevard. Also, the Greyhound Bus Terminal is located northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles area. Additionally, the above public bus lines provide access to Metro's light rail system. Lastly, the Greyhound Bus Terminal is located northwest of the Project Site on 7th Street, which provides private inter-city bus service to various locations outside of the Los Angeles. Therefore, the Project would not conflict with this goal.
14. Sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability.	No Conflict. As discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate environmentally sustainable design features to achieve LEED) Silver equivalent. Features would include, but not be limited to, Energy Star–labeled appliances; energy efficient lighting and HVAC equipment; and building energy modeling to improve energy performance. As discussed in Section IV.M.1, Water Supply and Infrastructure, of this Draft EIR, the Project would implement Project Design Feature WAT-PDF-1 to include water conservation features such as high-efficiency toilets with a flush volume of 1.0 gallon per flush; high-efficiency showerheads with a flow rate of 1.5 gallons per minute; drip/subsurface irrigation; and proper hydro-zoning/zoned irrigation. Furthermore, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project would introduce stormwater BMPs to the Project Site to control and treat stormwater runoff in compliance with LID requirements. Therefore, the Project would not conflict with this goal.
<b>16.</b> Open space, parks, and cultural, recreational, and educational facilities for the enjoyment of employees, residents, and visitors.	space for employees and visitors. On the ground floor, the