Appendix E

Land Use Tables

Appendix E Land Use Tables

2016–2040 RTP/SCS Goals	2020–2045 RTP/SCS Goals	Would the Project Conflict?
 Goal 2: Maximize mobility and accessibility for all people and goods in the region. Goal 4: Preserve and Ensure a sustainable regional transportation system. Goal 5: Maximize the productivity of our transportation system. Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g. bicycling and walking). Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation. 	 Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. Goal 4: Increase person and goods movement and travel choices within the transportation system. Goal 5: Reduce greenhouse gas emissions and improve air quality. Goal 6: Support healthy and equitable communities Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel. Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options. 	and would not preclude the implementation of these regional goals. The Project would increase urban density on an already developed urban infill site in a SCAG- designated HQTA and in close proximity to shopping, services and transit. The Project would also be served by an established network of roads and freeways that provide local and regional access to the Project Site (see the consistency analysis for the General Plan Framework Element Objective 3.2 and Policy 3.2.3 in Table 2 below for further discussion). Furthermore, the Project would provide: (1) bicycle parking spaces meeting LAMC requirements that would serve to promote the use of bicycles and encourage walking; (2) enhanced sidewalks with new street trees and other streetscape improvements along the Project Site's Bellwood Avenue frontage; (3) electric vehicle charging stations; (4) shuttle service
		In addition, as indicated in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant construction and operational air quality impacts associated with localized and regional air quality emissions and less-than-significant toxic air contaminants (TAC) impacts associated with on-site construction and operational activities. As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the Project would not conflict with relevant plans, policies, and regulations adopted for the purpose of reducing the emissions of

Table 1 Applicable Goals of SCAG's RTP/SCS

2016–2040 RTP/SCS Goals	2020–2045 RTP/SCS Goals	Would the Project Conflict?
		GHGs and impacts related to regulatory and plan consistency would be less than significant. Furthermore, because the Project is consistent with and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.
		Lastly, as indicated in Section IV.I, Transportation, the Project would reduce vehicle trips and would locate new housing and jobs in proximity to transit, reducing VMT and resulting in less-than-significant impacts on the transportation system.
		Based on the above, the Project would not conflict with the applicable RTP/SCS goals related to maximizing mobility and accessibility, ensuring a sustainable transportation system, maximizing the productivity of the transportation system, protecting the environment and health of residents, encouraging land use that facilitates transit and active transportation, and encouraging energy efficiency.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.		No Conflict. The Project would actively encourage energy efficiency, where possible. (see the consistent analysis for Objective 2.3 and Policy 2.3.3 in Table 2 for discussion). Hence, the Project would not conflict with this goal.
Source: Eyestone Environmer	ntal, 2021.	

Table 1 (Continued) Applicable Goals of SCAG's RTP/SCS

 Table 2

 Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Land Use Chapter	
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.	No Conflict. While this policy refers to the citywide provision of public infrastructure, as discussed in Section IV.H, Public Services (i.e., Section IV.H.1, Public Services—Fire Protection; Section IV.H.2, Public Services—Police Protection) and Section IV.K, Utilities and Service Systems (i.e., Section IV.K.1, Water Supply and Infrastructure; Section IV.K.2, Utilities and Service Systems—Wastewater; and Section IV.K.3, Utilities and Service Systems-Energy Infrastructure), of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, with the abandonment of the existing 4-inch water line and the installation of two new 8-inch water lines, the water utility infrastructure near the Project Site would have capacity to serve the Project. The Project would also realign Bellwood Avenue with public pedestrian and vehicular access maintained in both directions with enhanced sidewalks and new street trees along portions of Bellwood Avenue. Therefore, the Project would not conflict with this policy.
Policy 3.1.3: Identify areas for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.	No Conflict. The proposed eldercare facility would include three wings, each oriented around the proposed ground-level central courtyard for Project residents. An outdoor bistro terrace would be provided adjacent to the lobby entrance. The Project would also include multiple landscaped terraces, and a pedestrian pathway around the westerly, southerly and easterly setbacks of the Project providing connectivity to the ground-level on-site courtyard and other ground-level open spaces for Project residents. In all, the Project would provide 14,630 square feet of open space for Project residents, which would exceed the LAMC required open space of 7,800 square feet. Lastly, the Project would provide enhanced sidewalks and streetscape improvements, including new street trees and widened sidewalks, along portions of its Bellwood Avenue frontage. The new entry plaza along Bellwood Avenue would be located adjacent to the new sidewalk and the realigned sidewalks along the Project Site portion of Bellwood Avenue would continue to connect with the existing sidewalks that connect to the sidewalks along Olympic Boulevard to the north. Thus, the Project would not conflict with this policy.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	No Conflict. The Project would represent the intensification of urban density on an urban infill site within a Transit Priority Area (TPA), in close proximity to shopping, services, and transit. As discussed in the Transportation Study included in Appendix H of this Draft

 Table 2 (Continued)

 Applicable Goals, Objectives, and Policies of the General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	EIR, the study area is served by bus lines operated by Metro, Culver City Bus, Santa Monica Big Blue Bus, Antelope Valley Transit Authority, Santa Clarita Transit, and LADOT Commuter Express. The closest transit service is Santa Monica Big Blue Bus Lines 3 and 5 with bus stops located along Olympic Boulevard, near Kerwood Avenue (½-block to the southwest) and at Century Park West (one block to the northeast). The Project Site is also located approximately 0.5 mile from the future Metro Purple Line rail station at Constellation Boulevard and Avenue of the Stars. In addition, sidewalk and streetscape improvements (including any required lighting) would be provided along the Project Site's Bellwood Avenue frontage that would connect to other such existing improvements along Bellwood Avenue, and pedestrian pathways and plazas would be provided throughout the Project Site. Furthermore, as indicated in Section IV.I, Transportation, of this Draft EIR, the Project would reduce vehicle trips and would locate new housing and jobs in proximity to transit, reducing vehicle miles traveled (VMT) and resulting in less-than-significant transportation impacts. ¹
	While there are no existing bike lanes/paths in the Project vicinity, ² the Project would not hinder the future development of such lanes/paths. The Project would also provide 72 bicycle parking spaces which would meet LAMC requirements, would provide vehicle parking in subterranean structures with access provided from one entry/exit driveway located along Bellwood Avenue near the northern boundary of the building so as to not interfere with bicycle and pedestrian circulation, and would comply with City requirements for providing electric vehicle charging capabilities/stations. Thus, the Project would not conflict with this objective and policy.
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 population and employment growth would be well within SCAG's projections for the Subregion, which serve as the basis for the Framework Element's demographics projections and planned provisions of transportation and utility infrastructure and public services. As part of the Project, Bellwood Avenue

¹ Gibson Transportation Consulting, Transportation Assessment for Senior Residential Community at the Bellwood Project, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

² Gibson Transportation Consulting, Transportation Assessment for Senior Residential Community at the Bellwood Project, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

Objective/Policy	Would the Project Conflict?
	would be realigned, and public pedestrian and vehicular access would be maintained in both directions. In addition, the sidewalks would be enhanced and improved with new street trees along portions of Bellwood Avenue. The realigned sidewalks through the Project Site would continue to connect with the sidewalks along the existing portions of Bellwood Avenue that connect to Olympic Boulevard to the north. As discussed in Objective 3.2 above, the Project would be located in an area well- served by bus lines operated by Metro, Culver City Bus, Santa Monica Big Blue Bus, Antelope Valley Transit Authority, Santa Clarita Transit, and LADOT Commuter Express. The Project Site would also be located approximately 0.5 mile from the future Metro Purple Line rail station at Constellation Boulevard and Avenue of the Stars. In addition, as discussed in Policy 3.1.2 above, the Project would not require the construction of public services facilities that would cause significant environmental impacts. In addition, with the abandonment of the existing 4-inch water line and the installation of two new 8-inch water lines, the water utility infrastructure near the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this objective.
 Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures. Policy 3.9.7: Provide for the development of public streetscape improvements, where appropriate. Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate. 	No Conflict. The Project would enhance pedestrian activity by developing a new residential building in close proximity to shopping, services and transit. The Project would provide sidewalks and other streetscape improvements along its Bellwood Avenue frontage which would connect to other such improvements along Bellwood Avenue, and the Project's main entrance would be from the realigned portion of Bellwood Avenue. The Project would provide a pedestrian path within the Project Site's westerly, southerly, and easterly setbacks providing connectivity between the proposed on-site buildings and courtyard and other ground level open spaces. Therefore, the Project would not conflict with these policies.
Policy 3.13.6: Design multi-family residential units to minimize the impacts of traffic and noise and incorporate recreational and open space amenities to support the needs of the residents.	No Conflict. The Project would design the proposed eldercare facility to minimize the impacts of traffic as discussed in the consistency analysis for Objective 3.2 and Policy 3.2.3 above. The proposed eldercare facility would be designed to minimize the impacts of noise by: (1) providing a landscape buffer that includes new trees between the proposed facility and the existing residential uses to the south as indicated in Figure II-12, Conceptual Landscape Plan, in Section II, Project Description, of this Draft EIR; (2) the building entrance and access to parking would be oriented toward Bellwood Avenue and would be buffered from the residential uses to the south, east and west by the building itself; and (3) the Project would

Objective/Policy	Would the Project Conflict?
	include subterranean rather than surface parking as well as enclosed loading, service, trash, laundry, and kitchen facilities, such that operational noise associated with these uses would be minimized. The Project would design the proposed eldercare facility to incorporate recreational and open space amenities to support the needs of the residents as discussed in the consistency analysis for Policy 3.1.3 above.
	Based on the above, the Project would not conflict with this policy.
Objective 3.18: Provide for the stability and enhancement of multi-family residential, mixed- use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.	No Conflict. With regards to directing growth to areas where sufficient public infrastructure and services exist, see the consistency analysis for Policy 3.1.2, Objective 3.2 and Policy 3.2.3 above.
	As indicated therein, the Project would not conflict with this objective.
Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	No Conflict. The Project proposes an eldercare facility with a variety of housing types. Specifically, the Project would provide 71 dwelling units dedicated to Independent Living, 75 guest rooms dedicated to persons who require assistance with two or more non-medical activities of daily living (e.g., assisted living), and 46 guest rooms dedicated to persons who suffer from Alzheimer's disease or other disorders resulting in dementia and require 24-hour care. There is a growing need for eldercare facilities in Los Angeles because approximately 10 percent of the City's population is aged 65 years and older, ³ and this age group is expected to almost triple by 2035 in the greater Los Angeles area. ⁴ The Project would help meet this need and would result in a net increase in residential units on the Project Site.
	In recognition of the fact that these facilities provide much needed services and housing for the growing senior population of the City, the LAMC was amended in 2006 by the City Council (Ordinance No. 178,063) to allow eldercare housing within residential zones, including the R3 zone (the zoning of the portion of the Project Site south of Bellwood Avenue), subject to the approval of the Zoning Administrator.

³ According to United States Census 2010 data presented in the General Plan Housing Element.

⁴ Chart 1.2 "Change in Age Distribution: Past and Projected, 2000–2010 & 2010–2035" from Housing Element, p. 1-5.

Objective/Policy	Would the Project Conflict?	
	Based on the above, the Project would not conflict with this objective.	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit	No Conflict. See the consistency analyses for Objectives 3.2 and Policy 3.2.3. As indicated therein, the Project would not conflict with this objective.	
corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	In addition, the Project would include a stepped building design and would also provide a landscape buffer with new trees between the eldercare facility and the existing residential uses to the south and east of the Project Site. Therefore, the Project would not conflict with this objective.	
Urban Form and Neighborhood Design Chapt	er	
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. The following security features would be incorporated into the Project design to help increase personal safety at all times of the day, thereby reducing the need for police protection services and associated facilities: (1) lobby areas that are visible from the streets or entryways; (2) building entrances and exits, spaces around the building, and pedestrian walkways that are open and in view of surrounding sites; (3) public spaces that are easily patrolled and accessed by safety personnel; (4) sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building; (5) sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment; (6) gated access to parking facilities; (7) panic buttons within the parking facilities and parking area elevators; (8) access controls in the form of private on-site security, a closed circuit security camera system, and keycard entry for the building and parking areas; (9) 24-hour security to monitor entrances and exits and manage and monitor the fire/life/safety systems; and (10) the display of contact information for on-site security staff prominently throughout the Project Site. Hence, the Project would not conflict with this objective and policy.	
Open Space and Conservation Chapter		
Policy 6.4.7 : Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.	publicly-accessible open space, community gardens, shared school playfields, farmers markets, green space, etc. However, the Project would include a central courtyard for Project residents and multiple landscaped terraces throughout the Project Site. In all, the Project would provide 14,630 square feet of open space for	

Objective/Policy	Would the Project Conflict?
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.	
a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.	
b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	
Economic Development Chapter	
 Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City. Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements. 	No Conflict. The Project would provide a range of housing types for seniors (e.g., independent living, assisted living, and memory care units). Specifically, the Project would provide 71 dwelling units dedicated to Independent Living, 75 guest rooms dedicated to persons who require assistance with two or more non-medical activities of daily living (e.g., assisted living), and 46 guest rooms dedicated to persons who suffer from Alzheimer's disease or other disorders resulting in dementia and require 24-hour care. As such, the Project would provide a range of housing units for an increasing senior population of the City. Specifically, there is a growing need for eldercare facilities in Los Angeles because approximately 10 percent of the City's population is expected to shift, and almost triple by 2035 in the greater Los Angeles area. The Project would help meet this need and would result in a net increase in residential units on the Project Site. In addition, the Project would develop such units on an urban infill site with access to services and transportation, would meet a vital need for senior housing in the City (including in the Century City area), and would generate local jobs. See the consistency analysis for Objectives 3.2 and 4.1 above for further discussion.
	Based on the above, the Project would not conflict with this objective and policy.

Objective/Policy	Would the Project Conflict?
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. As discussed in the Initial Study prepared for the Project included as Appendix A of this Draft EIR, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Furthermore, pursuant to the Stormwater Pollution Prevention Plan (SWPPP) that would be implemented by the Project as required under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. The Project would also comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during the operational life of the Project to reduce the discharge of polluted runoff from the Project Site. The Project would also be required to comply with the County's Low Impact Development (LID) Standards Manual and the City's LID Ordinance, which promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Additionally, the Project does not include uses that handle or generate hazardous substances. Thus, with the implementation of the BMPs, the Project would reduce the amount of hazardous substances and the total amount of flow entering the wastewater system. As such, the Project would not conflict with this policy.
 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 support planned development. 	No Conflict. The Project would result in a net increase in water demand of an estimated 25,941 gpd. ⁵ As indicated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, with the abandonment of the existing 4-inch line and the installation of two new 8-inch lines, the water utility infrastructure near the Project Site would have capacity to serve the Project. As such, the Project would not conflict with this goal and objective.

Source: Eyestone Environmental, 2021.

⁵ Fuscoe Engineering, Inc., Water, Sewer and Energy Infrastructure Assessment Report – Senior Residential Community at the Bellwood, February 2020. Included as Appendix J of this Draft EIR.

Table 3Applicable Objectives and Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
Policy 1.1: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	No Conflict. The Project would include the vacation and realignment of the portion of Bellwood Avenue that bifurcates the Project Site. The newly aligned private street would be developed in accordance with City requirements and would include an entry motor court for pick-up and drop-off of eldercare facility residents. The primary access driveway to the below-grade parking would be located further to the north so as to reduce conflict with drop-off activities. The Project would also provide parking in subterranean structures rather than rely, in part, on street parking on Bellwood Avenue, which would increase pedestrian safety as it decreases interface between vehicles and pedestrians. In addition, the Project would provide enhanced sidewalks and street improvements (including new street trees any required lighting) along portions of the Project Site's Bellwood Avenue frontage. Lastly, while no bike lanes/paths currently existing in the vicinity, the Project would not hinder future development of safe bike lanes/paths, and would also provide bike parking facilities, including 72 bike parking spaces per LAMC requirements. As such, the Project would not conflict with this policy.
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	No Conflict. As identified in Section IV.I, Transportation, of this Draft EIR, construction of the Project and the realignment of the portion of Bellwood Avenue within the Project Site would require temporary rerouting of vehicular and pedestrian traffic. The Project would incorporate TR-PDF-1 included in Section IV.I. Transportation, of this Draft EIR, in which a Construction Management Plan would be prepared and implemented as part of the Project to minimize potential construction impacts to the surrounding area related to construction trucks, worker trips, and any possible sidewalk and lane closures. The Construction Management Plan would include temporary traffic controls during all construction activities adjacent to public rights-of-way on public roadways to provide for safe passage for all modes of travel during construction activities and other projects in the vicinity of the Project Site. In addition, a work site traffic control plan identifying the location of any temporary roadway lane and/or sidewalk closures needed during construction would be submitted to LADOT for review. Thus, the Project would provide safe passage for all modes of travel during construction and would not conflict with this policy.
Policy 2.3: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide	No Conflict. While this is a citywide policy, the Project would support its implementation. Specifically, sidewalk and streetscape improvements (including any required lighting) would be provided along the Project Site's Bellwood Avenue frontage that connects to existing

Policy	Would the Project Conflict?
a safe and comfortable walking environment.	improvements along Bellwood Avenue. The Project would also include a bistro terrace and lobby that would provide an active ground floor with pedestrian friendly improvements. In addition, a pedestrian pathway around the westerly, southerly and easterly setbacks of the Project would provide connectivity to the ground-level on-site courtyard and other ground-level open spaces. All Project pedestrian improvements, building entrances and corridors, elevators, parking areas, etc., would adhere to ADA requirements. Thus, 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. 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. Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita. 	No Conflict. The Project would represent an urban infill project within close proximity to freeways, arterials, transit, shopping, and services. Furthermore, the Project would provide charging facilities for electric vehicles, shuttle service for the eldercare residents, sidewalk and street improvements along the Project Site's Bellwood Avenue frontage, and on-site pedestrian paths. While no bicycle paths/lanes currently exist in the immediate vicinity of the Project Site, the Project would not hinder the future development of any such paths/lanes, and would also provide bike parking facilities, including 72 bike parking spaces per LAMC requirements. The Project would also reduce vehicle trips and locate new housing and jobs in proximity to transit, reducing VMT and resulting in a less than significant transportation impact. ⁶ Lastly, the Project would promote equitable land use decisions that result in fewer vehicle trips by providing senior housing in the Century City area of the City, in proximity to destinations and neighborhood services. Thus, the Project would not conflict with this policy.
Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	No Conflict. While this is a citywide policy, the Project would support its implementation. As detailed in the Transportation Study included in Appendix H of this Draft EIR, the study area is served by bus lines operated by Metro, Culver City Bus, Santa Monica Big Blue Bus, Antelope Valley Transit Authority, Santa Clarita Transit, and LADOT Commuter Express. The closest transit service is Santa Monica Big Blue Bus Lines 3 and 5 with bus stops located along Olympic Boulevard, near Kerwood Avenue (½-block to the southwest) and at Century Park West (one block to the northeast). The Project Site would also be located approximately 0.5 mile from the future Metro Purple Line rail station at Constellation Boulevard and Avenue of the

Table 3 (Continued)Applicable Objectives and Policies of the Mobility Plan 2035

⁶ Gibson Transportation Consulting, Transportation Assessment for Senior Residential Community at the Bellwood Project, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

Policy	Would the Project Conflict?
	Stars. Therefore, the Project would be located near convenient transit services available to residents and workers, and the Project would not conflict with this policy.
Policy 3.8: Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	No Conflict. The Project would provide 72 bicycle parking spaces as required by the LAMC. Short-term bicycle parking would be available on the ground floor along Bellwood Avenue, and long-term bicycle parking spaces would be located within gated and secured subterranean parking levels.
Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	relative to fuel sources, technologies and infrastructure, the
Policy 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.	No Conflict. While this is a Citywide policy, as discussed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, stormwater from the Project Site currently sheet flows to curb inlets along Bellwood Avenue with minimal infiltration where it is captured by catch basins near the Bellwood Avenue/Olympic Boulevard intersection before flowing westerly into the 63-inch storm drain main in Olympic Boulevard. No structural or LID BMPs to treat or infiltrate stormwater are currently present at the Project Site. The Project would increase the landscaped areas and reduce the amount of on-site impervious surfaces from 89 to 87 percent. To meet the local MS4 Permit and City LID requirements, stormwater management and infiltration strategies/features would be implemented such as subsurface storage/infiltration, drywell(s), infiltration trenches, subsurface infiltration galleries, permeable pavement, etc. Thus, the Project would not conflict with this policy.
Source: Eyestone Environmental, 2021.	

Table 3 (Continued)Applicable Objectives and Policies of the Mobility Plan 2035

Table 4
Applicable Objectives and Policies of the General Plan Housing Element 2013–2021

Policy	Would the Project Conflict?
Policy 1.1.3: Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.	No Conflict. The Project would provide a range of eldercare housing types (e.g., independent living, assisted living, and memory care units) that would address a particular need for senior housing in the City. See the consistency analysis for Objective 4.1 in Table 1 for further discussion. Therefore, the Project would not conflict with this policy and objective.
Policy 2.1.1: Establish development standards and policing practices that reduce the likelihood of crime.	No Conflict. The Project would provide a range of security measures/features to reduce crime, thereby reducing the need for police protection services and associated facilities. See the consistency analysis for Objective 5.9 and Policy 6.3.3 in Table 1 for additional discussion. Thus, the Project would not conflict with this policy
Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit. Policy 2.2.1: Provide incentives to encourage the integration of housing with other compatible land uses.	No Conflict. The Project would promote sustainable neighborhoods and integrate housing and other compatible uses in that it would: (1) increase urban density on an urban infill site in proximity to shopping, services and transit which would serve to reduce VMT; (2) include a range of housing types (independent living, assisted living, and memory care units) for seniors; (3) be developed in a mixed-use neighborhood; and (4) would be compatible with adjacent development. See the consistency analysis for Objective 3.2 and Policy 3.2.3 in Table 1 for further discussion. Hence, the Project would not conflict with this objective and policy.
 Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources. Policy 2.3.3: Promote and facilitate reduction of energy consumption in new and existing housing. 	No Conflict. The Project would promote sustainable buildings which minimize adverse effects on the environment and minimize the use of non-renewable resources by complying with Title 24 energy conservation requirements and incorporating the environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. Furthermore, the Project would represent smart growth and environmental sustainability by intensifying urban density on an urban infill site in proximity to transit, providing shuttle service for the Project's senior residents, and providing charging stations for electric vehicles for Project residents, guests, and employees. Overall, as evaluated in Section IV.C, Energy, of the Draft EIR, the Project would not result in the wasteful or inefficient use of energy, and impacts would be less than significant. Thus, the Project would not conflict with this objective and policy.
Policy 2.3.2: Promote and facilitate reduction of water consumption in new and existing housing.	No Conflict. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would comply with the water conservation requirements of the Los Angeles Green Building Code and CALGreen. Water conservation

Table 4 (Continued) Applicable Objectives and Policies of the General Plan Housing Element 2013–2021

Policy	Would the Project Conflict?
	features could include, but would not necessarily be limited to, high efficiency toilets, low-flow showerheads and faucets, ENERGY STAR residential clothes washer and dishwashers, and domestic water heating systems that are located in close proximity of the point(s) of use. Thus, the Project would not conflict with this policy.
Policy 2.3.4: Promote and facilitate reduction of waste in construction and building operations.	No Conflict. As discussed in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, during operation, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with Assembly Bill (AB) 939, AB 341, AB 1826 and City recycling and waste diversion requirements, as applicable, by separating recyclables and organic waste from the Project's waste stream, providing clearly marked, source- sorted receptacles, and undertaking other measures, as required, to comply with these regulations. Therefore, the Project would not conflict with this policy.
 Policy 2.4.2: Develop and implement design standards that promote quality residential development. Policy 2.4.3: Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces. 	No Conflict. The Project would feature a contemporary architectural style and would be designed to create a visually unified site with a new building designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In particular, building scale and massing would be defined by varying massing and height components that break up the facade into distinct and offset planes. Building materials would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels and glass. The Project would be consistent with relevant design guidelines in the General Plan Framework's Urban Form and Neighborhood Design Chapter, the Community Plan's Urban Design Chapter, and the Citywide Design Guidelines. The Project would also include: (1) multiple landscaped terraces, and a pedestrian pathway around the westerly, southerly and easterly setbacks of the Project providing connectivity to the ground-level on-site courtyard and other ground-level open spaces for Project residents; (2) a total of 14,630 square feet of open space for Project residents, which

Table 4 (Continued) Applicable Objectives and Policies of the General Plan Housing Element 2013–2021

Policy	Would the Project Conflict?
	would exceed that required by the LAMC for the Project of 7,800 square feet; and (3) sidewalk and streetscape improvements along the Project Site's Bellwood Avenue frontage. Therefore, the Project would not conflict with these policies.
Source: Eyestone Environmental, 2021.	

 Table 5

 Applicable Goals, Objectives, and Policies of the West Los Angeles Community Plan

Objective/Policy	Analysis of Project Consistency
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	Partially Consistent. As discussed in Section IV.G, Population and Housing, of this Draft EIR, the Project Site is currently developed with three multi-family residential developments with a total of 112 units comprised of 95 studio units, 15 one-bedroom units, and two two-bedroom units that would be removed as part of the Project. Based on the generation rates provided by the
Objective 1-4: To promote adequate and affordable housing and increase its accessibility to more segments of the population, especially students and senior citizens.	City of Los Angeles VMT Calculator Documentation, the existing multi-family residential buildings could house approximately 252 people. ⁷ It is noted that this estimate is conservative, and the actual number of existing
Policy 1-1.3: Provide for adequate multi-family residential development.	persons on the Project Site would be less than that estimated by the use of the City's multi-family land use
Policy 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	rate, as the existing units are studio and one-bedroom units that are small in size (approximately 275 to 375 square feet) and primarily occupied by single persons.
	The Project would construct 192 senior housing residential units, including 71 senior-independent living dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. The Project would result in a net increase of 80 residential units compared to existing conditions. The Project would provide a range of housing units for an increasingly senior population of the City. Specifically, there is a growing need for eldercare facilities in Los Angeles because approximately 10 percent of the City's population is aged 65 years and older, ⁸ and the age distribution is expected to shift, and almost triple by 2035 in the greater Los Angeles area. ⁹ The Project would comply with the applicable provisions of the RSO and the Ellis Act regarding relocation. Therefore, while the Project would displace existing housing and residents, such displacement would not be considered substantial requiring the construction of replacement housing elsewhere. Additionally, it is anticipated that senior residents will vacate their current residential housing to move to the Project Site upon completion of the Project, thereby providing for the availability of other housing elsewhere. Thus, the Project would not conflict

- ⁷ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 112 existing residential units.
- ⁸ According to United States Census 2010 data presented in the General Plan Housing Element.
- ⁹ Chart 1.2 "Change in Age Distribution: Past and Projected, 2000–2010 & 2010–2035" from Housing Element.

Objective/Policy	Analysis of Project Consistency
	with these objectives and policies.
 Policy 1-1.2: Promote neighborhood preservation in all residential neighborhoods. Objective 1-3: To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods. 	No Conflict. The Project would promote neighborhood preservation and preserve and enhance the varied and distinct residential character and integrity of the Project area. See the consistency analysis for Objective 1-1, above, and Objective 4.2 in Table 2 for further discussion. The Project would not conflict with this policy and objective.
 Objective 1-2: To reduce vehicular trips and congestion by developing new housing in proximity to adequate services and facilities. Policy 1-2.1: Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development. 	No Conflict. The Project would increase urban density on an urban infill site within proximity to major commercial centers (e.g., Century City Regional Center ¹⁰ and Century City commercial district), shopping, services and transit. The Project would also reduce vehicle trips. ¹¹ See the consistency analysis for Objective 3.2 and Policy 3.2.3 in Table 1 for further discussion. Thus, the Project would not conflict with this objective and policy.
Policy 1-3.1: Require architectural compatibility and adequate landscaping for new multi-family residential development to protect the character and scale of existing residential neighborhoods.	No Conflict. The Project would provide architectural compatibility and adequate landscaping that is protective of the character and scale of existing residential neighborhoods. See the consistency analysis for Policy 3.7.4 in Table 1 for discussion. The Project would not conflict with this policy.
Policy 1.4-1: Promote greater individual choice in type, quality, price and location of housing.	No Conflict. The Project proposes an eldercare facility with a variety of housing types to help meet the needs of an increasingly senior population of the City. Specifically, the Project would provide 71 dwelling units dedicated to Independent Living, 75 guest rooms dedicated to persons who require assistance with two or more non-medical activities of daily living (e.g., assisted living), and 46 guest rooms dedicated to persons who suffer from Alzheimer's disease or other disorders resulting in dementia and require 24-hour care. The Project would increase urban density on an urban infill site within proximity to major commercial centers (e.g., Century City Regional Center ¹² and Century City commercial district), shopping, services and transit. Thus, the Project would not conflict with this policy.

¹⁰ City of Los Angeles, City of Los Angeles General Plan Framework, Land Use Element, Figure 3-3, Long Range Land Use Diagram for West/Coastal Los Angeles, February 19, 2003.

- ¹¹ Gibson Transportation Consulting, Transportation Assessment for Senior Residential Community at the Bellwood Project, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.
- ¹² City of Los Angeles, City of Los Angeles General Plan Framework, Land Use Element, Figure 3-3, Long Range Land Use Diagram for West/Coastal Los Angeles, February 19, 2003.

Objective/Policy	Analysis of Project Consistency
Policy 1.4-2: Ensure that new housing opportunities minimized displacement of residents.	Partially Consistent. The Project would remove the existing 112 units of multi-family housing on the Project Site and thus displace the associated residents of those units. However, the Project would replace this housing with 192 eldercare housing units and would result in a net increase of 80 residential units. In addition, the Project would comply with the applicable provisions of the RSO and the Ellis Act regarding relocation assistance Furthermore, as noted in the City's Housing Element, there is a growing need in the City for senior housing. Specifically, approximately 10 percent of the City's population is expected to almost triple by 2035 in the greater Los Angeles area. ¹⁴ Additionally, it is anticipated that senior residents will vacate their current residential housing to move to the Project Site upon completion of the Project, thereby providing for the availability of other housing elsewhere. Thus, the Project would not conflict with this policy.
Policy 1.4-3: Encourage multiple residential development in specified commercial zones.	No Conflict. The Project would include the development of 192 units of eldercare housing on the Project Site, including on the portion of the Project Site zoned C2. Hence, the Project would include a multiple residential senior residential development in a commercial zone (a permitted use in the C2 zone), and thus would not conflict with this policy.
 Policy 2-2.1: Encourage Pedestrian-oriented design in designated areas and in new development. Objective 12-2: To promote pedestrian-oriented mobility for commuter, school, recreational use, economic activity and access to transit facilities. Policy 12-2.3: Protect and improve pedestrian- 	No Conflict. The Project would promote pedestrian- oriented mobility and access to transit and improve pedestrian-oriented street segments. See the consistency analysis for Policy 3.2.3 in Table 2 for further discussion. Thus, the Project would not conflict with this objective and policy.
oriented street segments.	
Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent	No Conflict. The Project would consist of a three- to six-story building configured around a central courtyard. Extensive landscaped grounds would include landscaped side and rear yard setbacks around the perimeter of the Project Site as well as landscaped common area courtyards and roof deck terraces that serve to create a

¹³ According to United States Census 2010 data presented in the General Plan Housing Element.

¹⁴ Chart 1.2 "Change in Age Distribution: Past and Projected, 2000–2010 & 2010–2035" from Housing Element.

Objective/Policy	Analysis of Project Consistency
neighborhoods.	buffer between the eldercare facility and the surrounding residential uses to the west, south and east of the Project Site. The northerly portion of the Project Site would be improved with the realigned portion of Bellwood Avenue that offers public vehicle and pedestrian access through the Project Site, including pedestrian sidewalks connecting the Project to the commercial uses along Olympic Boulevard to the north.
	In terms of size and height, careful attention has been paid to the Project design to ensure the scale and massing of the building would be compatible with the surrounding uses. The building is designed such that the six-story portion would be located centrally in the building, nearest the commercial uses and four-story hotels to the north. The building would step down in height as it nears the southerly and westerly property lines nearest the residential uses. Roof deck terraces would be provided at the fourth-floor level facing the southerly property line so that fourth floor level units are setback from adjacent residential uses to the south. The fifth-floor level would be further stepped down on the westerly wing of the building where a roof terrace would face the westerly property line. The easterly wing would include a landscaped rooftop terrace at the sixth-floor level nearest the residential use to the east.
	Based on the above, the Project would not conflict with this policy.
Policy 8-1.1: Consult with the Police Department in the review of development projects and land use changes to determine law enforcement needs and requirements.	No Conflict. As discussed in Section IV.H-2, Public Services—Police Protection, of this Draft EIR, the Project Applicant would consult with the Los Angeles Police Department (LAPD) Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project. The LAPD was also consulted as part of the preparation of this Draft EIR, and responses regarding the Project provided by the LAPD in their letter were incorporated. ¹⁵ Additionally, this Draft EIR will be made available to the LAPD for its review and comment. Finally, the Project would incorporate security measures (see consistency analysis for Objective 5.9 and Policy 6.3.3 in Table 1 above). Thus, the Project would not conflict with this policy.

¹⁵ Correspondence with LAPD's Community Outreach and Development Division, dated July 29, 2019. Included as Appendix G of this Draft EIR.

Objective/Policy	Analysis of Project Consistency
Policy 8-2.2: Ensure adequate lighting around residential, commercial and industrial buildings to improve security.	No Conflict. The Project would provide sufficient lighting of building entries, walkways, parking areas, elevators, and lobbies to: (1) facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building; and (2) maximize visibility and reduce areas of concealment.
	Furthermore, the LAPD's Crime Prevention Unit would review the Project for required crime prevention features, including lighting. These measures would reduce the need for police protection services and associated facilities. Thus, the Project would not conflict with this policy.
Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.	No Conflict. The Project's perimeter landscaping would not impede visibility or provide hidden places. See the consistency analysis for Policy 8-1.1 above for further discussion. Hence, the Project would not conflict with this policy.
 Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land use. Policy 9-1.1: Coordinate with the Fire Department the review of significant development projects and General Plan amendments affecting land use to determine the impact on service demands. 	No Conflict. As discussed in Section IV.H-1, Public Services—Fire Protection, of this Draft EIR, Project impacts on fire protection and emergency medical services provided by the Los Angeles Fire Department (LAFD) would be less than significant. Furthermore, the LAFD would be consulted during final building design to ensure Fire Code compliance prior to the issuance of a building permit. Standard LAFD regulations, including access, fire flow, and fire prevention measures would be applied to the Project. The LAFD was also consulted as part of the preparation of this Draft EIR. ¹⁶ Additionally, this Draft EIR will be made available to the LAFD for its review and comment. Therefore, the Project would not conflict with this objective and policy.
Policy 12-1.4: Encourage the provision of changing rooms, showers and bicycle storage at new and existing non-residential developments and public places.	No Conflict. The Project is a residential development, and would provide 72 bicycle parking spaces which would meet LAMC requirements. Hence, the Project would not conflict with this policy.
Objective 16-1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary road access and street improvements	No Conflict. The Project would be subject to the operational considerations in the Non-CEQA portion of the current LADOT TAG, which is enforced as a regulatory requirement through LADOT review in the building permit process. The Project would be consistent with the Mobility Plan 2035's and the Community Plan's policies promoting multi-modal transportation and safety

¹⁶ Correspondence with LAFD Bureau of Fire Prevention and Public Safety, dated July 12, 2019. Included as Appendix G of this Draft EIR.

Objective/Policy	Analysis of Project Consistency
are provided to accommodate traffic generated by new development.	as it would represent an urban infill project within close proximity to freeways, arterials, transit, shopping, and services. Furthermore, the Project would provide charging facilities for electric vehicles, shuttle service for the eldercare residents, sidewalk and street improvements along the Project Site's Bellwood Avenue frontage, and on-site pedestrian paths. While no bicycle paths/lanes currently exist in the immediate vicinity of the Project Site, the Project would not hinder the future development of any such paths/lanes, and would also provide bike parking facilities, including 72 bike parking spaces per LAMC requirements. Lastly, all Project access and street improvements would be developed in accordance with City design requirements. Therefore, the Project would not conflict with this objective.
Objective 16-2: To ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.	No Conflict. The Project would be developed on an urban infill site within close proximity to existing freeways, major arterials, transit facilities, and other transportation infrastructure. Furthermore, the Project Site is already developed with residential uses, is already accessed by existing streets, and is already served by parking facilities. The Project would replace the existing multifamily development at the Project Site with senior housing at a greater density and would realign the portion of Bellwood Avenue that bifurcates the Project Site as a private street. Realignment of the portion of Bellwood Avenue would not adversely affect access/circulation to abutting and nearby uses as through public access would be maintained from both sides of Bellwood Avenue through the Project Site, and the existing intersections of Bellwood Avenue and Olympic Boulevard would not be affected by the proposed realignment of Bellwood Avenue as part of the Project. Rather, improved pedestrian access would be provided through enhanced sidewalks with new street trees. Lastly, the Project would be consistent with the provision of adequate transportation infrastructure (see the consistency analysis for Objective 16-1 above for discussion). Thus, the Project would be consistent with this objective.

Source: Eyestone Environmental, 2021.