

IV. Environmental Impact Analysis

F. Land Use and Planning

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would physically divide an established community and whether the Project would conflict with any land use plans, laws, or regulations, adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Policies and regulations related to other environmental topics are also addressed in other sections of this Draft EIR. **Section IV.A, *Air Quality***, addresses relevant air quality plans and policies; **Section IV.B, *Cultural Resources***, discusses nearby historical resources; **Section IV.I, *Transportation***, discusses the circulation system, including transit, roadway, bicycle and pedestrian facilities; and **Chapter VI, *Other CEQA Considerations***, addresses growth inducement.

2. Environmental Setting

a) Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments Connect SoCal - 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments
- City of Los Angeles General Plan
- Wilshire Community Plan
- City of Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) *California Government Code Section 65302*

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

(b) *Senate Bill 375*

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

(2) Regional

(a) *Southern California Association of Governments Regional Connect SoCal 2020-2045 Regional Transportation Plans/Sustainable Communities Strategy of the Southern California Association of Governments*

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline

socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive greenhouse gas reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2019-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs) by six percent and the share of new job growth in HQTAs by 15 percent.

(3) Local

(a) *City of Los Angeles General Plan*

The City of Los Angeles General Plan (General Plan), originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements, including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality.^{1,2} The City's General Plan also includes the General Plan Framework Element (Framework Element), the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

¹ City of Los Angeles Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed February 26, 2021.

² The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

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

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

(a) *Land Use Chapter*

The Framework Element Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) that includes standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

The Project Site is located within a Regional Center, which is defined as a focal point of regional commerce, identity and activity.³ The Regional Center designation will generally fall within the floor area ratios (FAR) from 1.5:1 to 6:1 and are characterized by six- to 20-story (or higher) buildings.^{4,5}

Table 3-1 of the Framework Element's Land Use Chapter lists the following as typical land use standards and development characteristics within a Regional Center:⁶

- Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities, commercial overnight accommodations, and similar uses;

³ City of Los Angeles, General Plan Framework Element, Figure 3-1, Long Range Land Use Diagram, Metro, 2003.

⁴ City of Los Angeles, General Plan Framework Element, Figure 3-1, Long Range Land Use Diagram, Metro, 2003.

⁵ In the City of Los Angeles, floor area ratio (FAR) is based on the "net" lot size, or the lot area minus the required setbacks. The FAR is calculated by dividing the total developed floor area by the "net" lot size.

⁶ City of Los Angeles, General Plan Framework Element, Table 3-1, Land Use Standards, page 3-13.

- Mixed-use structures integrating housing with commercial uses;
- Multi-family housing (independent of commercial);
- Major transit hub; and
- Inclusion of small parks and other community-oriented activity facilities.

The development of sites and structures integrating housing with commercial uses is encouraged in Regional Centers, in concert with supporting services, recreational uses, open space, and amenities.⁷ The density of Regional Centers also supports the development of a comprehensive and inter-connected network of public transit and services.⁸

(b) Housing Chapter

The overarching goal of the Framework Element Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter recognizes that the distribution of housing in proximity to transit can reduce vehicle trips and provide residents with the opportunity to walk between their home, job, and/or neighborhood services. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

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

(c) Urban Form and Neighborhood Design Chapter

The Framework Element Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is

⁷ City of Los Angeles, General Plan Framework Element, 1995, page 3-24.

⁸ City of Los Angeles, General Plan Framework Element, 1995, page 3-25.

two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.⁹ The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the updating of community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in regional centers, which have a sufficient base of both commercial and residential development to support transit services. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(d) Open Space and Conservation Chapter

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

(e) Economic Development Chapter

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

(f) Transportation Chapter

The Framework Element Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access

⁹ City of Los Angeles, General Plan Framework Element, 1995, page 5-1.

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

(g) Infrastructure and Public Services

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

(ii) *Transportation Element (Mobility Plan 2035)*

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

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

- Safety First

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

(iii) *Conservation Element*

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

(iv) *Housing Element*

The General Plan Housing Element 2013-2021 (Housing Element) is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

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

Because the Project would not involve the removal of existing housing and would not involve the development of housing, the goals of the housing element would not be pertinent to the Project and are not further evaluated in this Draft EIR.

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

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development.¹⁰ Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes the following goals:

- Los Angeles, A Leader in Health and Equity;
- A City Built for Health;
- Bountiful Parks and Open Spaces;
- Food that Nourishes the Body, Soul, and Environment;
- An Environment Where Life Thrives;
- Lifelong Opportunities for Learning and Prosperity; and
- Safe and Just Neighborhoods.

Included in this General Plan Element are policies pertaining to the arrangement of land uses within the City and building design procedures.¹¹ As such, these policies address characteristics of the physical environment that contribute to public health.

(v) *Wilshire Community Plan*

The land use policies and standards of the Framework Element and the General Plan elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the City, defining locally the Framework Element's more general policies and programs and are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community. The Project Site is located within the

¹⁰ City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015.

¹¹ City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015. Policy 2.2, Healthy building design and construction, page 42; and Policy 5.7, Land use planning for public health and GHG emission reduction, page 94.

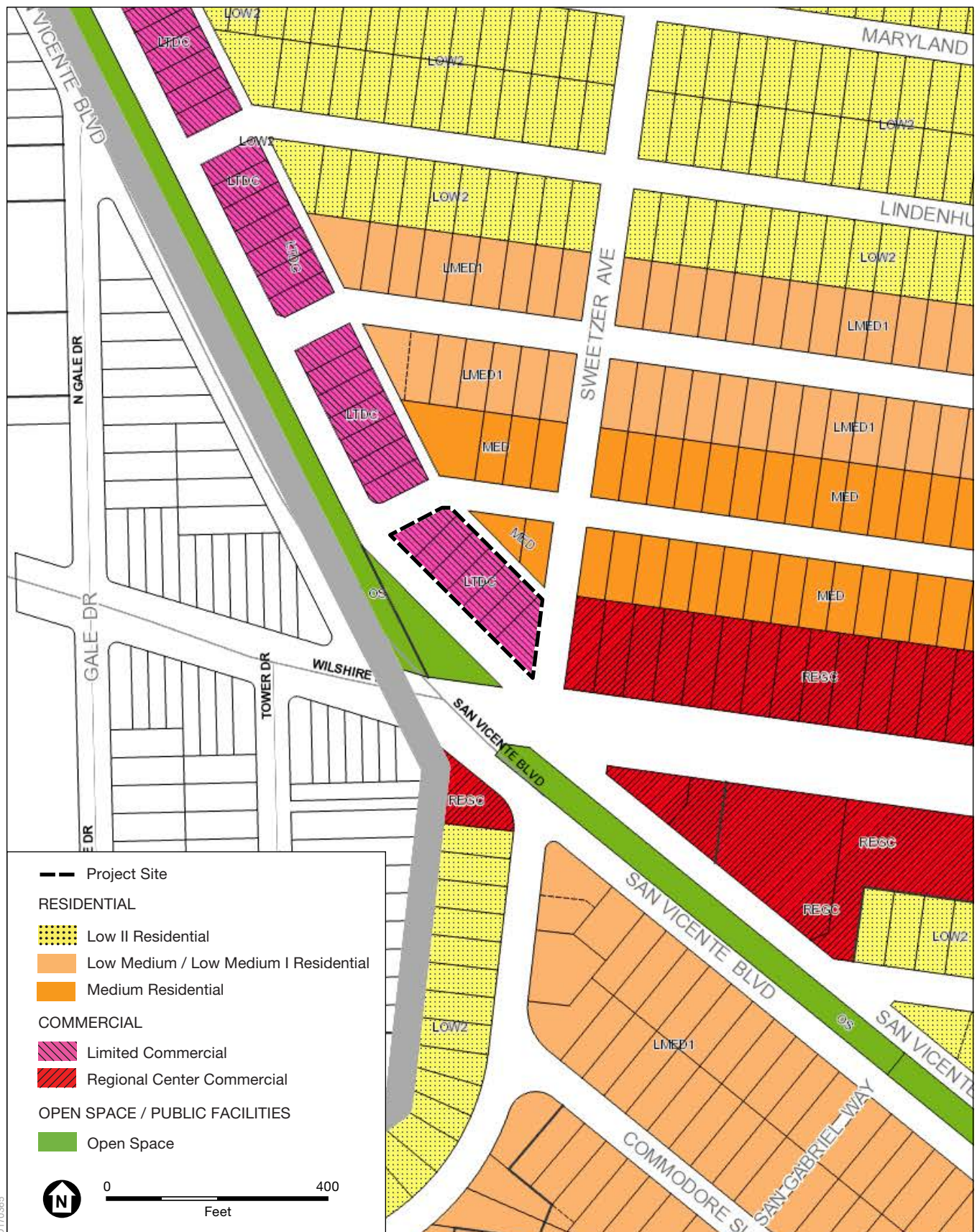
Wilshire Community Plan area.

The Wilshire Community Plan is the official guide to future development within the Community Plan area.¹² The Wilshire Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Wilshire Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, and builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible. In the Wilshire Community Plan's General Land Use Map, shown in **Figure IV.F-1, *Wilshire Community Plan Land Use Designation***, the Project Site is designated as "Limited Commercial." The Project Site is also located within the Miracle Mile Regional Commercial Center, which is located in the west central portion of the plan area, and the Wilshire Community Plan, defined as generally bounded by 3rd Street on the north, 8th Street on the south, Sycamore Avenue on the east, and South San Vicente Boulevard on the west.

The Wilshire Community Plan acknowledges that improvements to the appearance of new construction, particularly in commercial areas within the Wilshire Community Plan area, is needed to offset an otherwise severe industrial appearance along some major thoroughfares and is achieved by adding landscaping and more imaginative architecture. The Wilshire Community Plan highlights the importance of designing new commercial developments in terms of architectural design, bulk and building heights to be compatible with existing buildings. The Wilshire Community Plan also encourages the enhancement of the visual environment and pedestrian amenities along South San Vicente Boulevard.

The Wilshire Community Plan establishes urban design standards for certain private projects, including commercial developments, to promote a stable and pleasant environment. The standards in commercial areas are intended to emphasize the visual continuity of streetscapes, the creation of an environment that encourages both pedestrian and economic activity, and the establishment of identifiable neighborhoods fostered by commercial settings which contribute to the social life and economic vitality of the Wilshire Community Plan area.

¹² City of Los Angeles, Wilshire Community Plan, September 2001.



SOURCE: Zimas, 2020

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Figure IV.F-1
Wilshire Community Plan Land Use Designation

(b) *City of Los Angeles Municipal Code*

Los Angeles Municipal Code (LAMC), Chapter 1 (Planning and Zoning Code) identifies a range of zoning classifications throughout the City, identifies the specific permitted uses applicable to each zone designation, and applies development regulations to each zone. **Figure IV.F-2, Zoning**, shows the zoning for the Project Site and vicinity. The Project Site is zoned C1-1VL-O. The C1 in the zoning designation indicates limited commercial uses and generally permits commercial and retail uses. The “1VL” indicates Height District 1VL, which is a Very Limited Height District that, in combination with the C1 Zone, allows for three stories and 45 feet in height, and an FAR of 1.5:1. The “O” designation identifies the City’s Oil Drilling (O) District, which is designated for areas where drilling of oil wells or the production from the wells of oil, gasses or hydrocarbon substances is permitted. Zoning changes, such as those proposed by the Project, have the potential to result in changes to the environment and, as such, are evaluated further below.

(c) *Citywide Design Guidelines*

The Citywide Design Guidelines serve to implement the Framework Element’s urban design principals and are intended to be used by the City of Los Angeles Department of City Planning (DCP) staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines are intended to “carry out the common design objective that maintain neighborhood form and character while promoting quality design and creative infill development solutions” and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design.



SOURCE: Zimas, 2020

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Figure IV.F-2
Zoning

b) Existing Conditions

(1) Project Site

The Project Site is bounded by South San Vicente Boulevard to the west, Wilshire Boulevard to the south, South Sweetzer Avenue to the east, and Orange Street to the north. A small alley abuts the Project Site to the northeast. The Project Site is located approximately 0.9 miles south of the City of West Hollywood, and less than 200 feet (approximately 0.035 miles) east of the City of Beverly Hills, which is located on the eastern side of South San Vicente Boulevard.

The approximately 0.76-acre Project Site is comprised of seven parcels and is presently developed with a 5,738 square-foot vacant educational building, an 8,225 square-foot Big 5 Sporting Goods store, and associated surface parking.¹³ Surface parking is located on the eastern portion of the Project Site, fronting South San Vicente Boulevard, South Sweetzer Avenue and the alley to the north, as well as in the middle of the Project Site between the two buildings, and to the rear of the Big 5 Sporting Goods store. All parking areas are accessible from South San Vicente Boulevard and the alley.

(2) Surrounding Uses

The Project Site is located in the Wilshire Community Plan area in the City of Los Angeles, which is a 14 square-mile area and generally extends from Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the city limits of West Hollywood and Beverly Hills to the west. The Wilshire Community Plan area has a mixture of low- to medium-density residential uses interspersed with areas of higher density residential uses, and long narrow corridors of commercial activity along major streets, including Wilshire Boulevard, that include numerous high-rise office buildings, entertainment centers, museums and regional shopping complexes.

The Project Site is in a highly urbanized area, bordered by mid- and high-rise commercial, office, and medical-related uses along South San Vicente Boulevard and Wilshire Boulevard to the west and south. Directly northwest of the Project Site, along South San Vicente Boulevard, is a five-story office building with existing rooftop billboards, and an associated four-story parking structure. Further north is a three-story rehabilitation center. Directly across from the Project Site in the City of Beverly Hills is a 10-story office building with ground floor commercial uses. North of the 10-story office building is a three-story office/retail building and two apartment complexes that are two- and three-stories in height. To the south,

¹³ The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

across from the intersection of South San Vicente Boulevard and Wilshire Boulevard, is a low-rise commercial center and associated surface parking. To the southeast, fronting Wilshire Boulevard is a 22-story medical office building owned by Cedars-Sinai Medical Center, which includes a rooftop heliport. Directly east of the Project Site, across South Sweetzer Avenue, is a two-story brick building used as office space. East of the building is a 12-story office building used by the Jewish Federation Goldsmith Center and the five-story Los Angeles Obchestvo Remeslenogo Truda (ORT) College.

Directly northeast of the Project Site across the alley are two, two-story apartment buildings. Further to the north and east, along Orange Street and South Sweetzer Avenue, are low-rise multi-family and single-family residential uses, located within the proposed 6th Street-Orange Street Multi-Family Residential Historic District. Low-rise single-family and multi-family residential uses are also located to the south, across Wilshire Boulevard. Cedars-Sinai Medical Center and the Beverly Center are located less than one mile to the northwest; and the Los Angeles County Museum of Art campus (LACMA) and La Brea Tar Pits are located 0.75 miles to the southeast of the Project Site.

The general vicinity and relationship of the Project Site to surrounding streets is illustrated in **Figure II-1, Project Location**, and **Figure II-2, Aerial View of the Project Site and Surrounding Uses**, contained in **Chapter II, Project Description**, of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

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

Threshold (a): Physically divide an established community; or

Threshold (b): Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. The factors to evaluate land use impacts are listed below.

(1) Land Use Consistency

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

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

b) Methodology

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, that are applicable to the Project Site and the Project and that have been adopted for the purpose of avoiding or mitigating an environmental effect.

CEQA Guidelines Section 15125(d) requires that, in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 “an EIR shall identify and focus on the significant effects of the proposed project on the environment.” An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment. ...if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project

violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.

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

Project consistency with applicable policies that have been adopted for the purpose of avoiding or mitigating an environmental effect as set forth in SCAG's 2020-2045 RTP/SCS, the Framework Element, and Wilshire Community Plan are provided in tables contained in Appendix G, of this Draft EIR. The results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below. To the extent that the Projects' potential conflict with a plan, program or policy is analyzed in another section of the EIR that plan is not further discussed in the Land Use Section. For example, consistency with transportation plans is analyzed in **Section IV.I, *Transportation***, of this Draft EIR.

c) Project Design Features

No specific project design features are proposed with regard to land use.

d) Analysis of Project Impacts

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

As discussed in **Section VI, *Other CEQA Considerations***, of this Draft EIR, and as included in the Initial Study, provided in Appendix A, of this Draft EIR, as the Project would not encroach into adjacent streets or require vacations of streets or changes in the City's circulation system and, as such, the Project would not physically divide an established community. **Therefore, no impact would occur with respect to Threshold (a) and no further analysis is required.**

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

(1) Impact Analysis

The development of the Project would be subject to various land use plans, policies, and the development regulations adopted for the purpose of avoiding or mitigation an environmental effect. The Project's consistency with the applicable regional and local regulations, plans, and policies are addressed below and include SCAG's 2020-2045 RTP/SCS, the City's General Plan, including the Framework Element, Conservation Element, Plan for Healthy Los Angeles, and Wilshire Community Plan), the LAMC, and Citywide Design Guidelines.

Other plans that address the distribution of land use in the region and that are linked with SCAG are addressed in other sections of this Draft EIR. Specifically, Project consistency with the AQMP is analyzed in **Section IV.A, Air Quality**, and Senate Bill 375 and SCAG's Sustainable Communities Strategy are discussed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR.

(a) SCAG's 2020-2045 RTP/SCS

SCAG's 2020-2045 RTP/SCS incorporates several goals that are applicable to the Project and that would avoid or reduce the Project's environmental impacts. As shown in Table LU-1, *Comparison of the Project to Applicable Goals of the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, provided in Appendix G of this Draft EIR, the Project would not conflict with applicable goals of the RTP/SCS. As further described in Table LU-1, the goals of the 2020-2045 RTP/SCS are focused on such priorities as increase persons and goods movement within the transportation system; reducing GHG emissions and improve air quality; and adapt to changing client and support an integrated regional development pattern and transportation network. These goals facilitate transit use and active transportation (e.g., bicycling and walking), reducing vehicle miles traveled, and encouraging energy efficiency. The Project would meet RTP/SCS goals through such features and characteristics as: the location of the Project within an HQTa and in proximity to local and regional bus lines and the future Wilshire/La Cienega Metro D (Purple) Line station; provision of up to 716 bicycle parking spaces for short- and long-term use by building employees and visitors; and compliance with the City's Green Building Code and 2019 CALGreen Code. In addition, as discussed further in **Section IV.E, Greenhouse Gas Emissions**, some of the Project's key design features include energy conservation, water conservation, waste reduction features, and pedestrian- and bicycle-friendly site design. Furthermore, the Project would include ENERGY STAR-rated appliances and install energy efficient boilers, heaters and air conditioning systems. All glass used in the building would have minimal reflectivity to reduce glare to surrounding neighbors. A portion of the vehicle parking spaces proposed on the Project Site would be capable of supporting future electric vehicle supply equipment (EVSE), as well as equipped with electric vehicle (EV) charging stations. The Project would also provide solar-ready wiring on the highest roof level. The terraced landscaped areas on Floors 6 through 10 would serve as partial green roofs that would help

cool the building, and would include sustainable paving materials that would minimize heat. Additionally, the Project would provide a high density office use in an area with pedestrian access to a range of commercial and retail services as well as numerous job opportunities, consistent with this goal.

Accordingly, and as further described in Appendix G of this Draft EIR, the Project would not conflict with applicable goals of SCAG's 2020-2045 RTP/SCS, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to SCAG's 2020-2045 RTP/SCS would be less than significant.

(b) *City of Los Angeles General Plan*

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

The Framework Element, which establishes the conceptual basis for the City's General Plan, sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies do not override or supersede the more detailed community plans and specific plans.

Table LU-2, *Comparison of the Project to Applicable Objectives and Policies of the Framework Element*, provided in Appendix G of this Draft EIR, evaluates the consistency of the Project with objectives and policies of the Framework Element. As discussed in Table LU-2, the Project would not conflict with applicable objectives and policies of the Framework Element. The following summarizes the analysis provided in Table LU-2. Note that only certain goals, objectives, and policies from the Land Use Chapter and the Urban Form and Neighborhood Design Chapter of the Framework Element are relevant to the Project.

(a) *Land Use Chapter*

As discussed in Table LU-2, the Project would not conflict with the objectives and policies of the Land Use Chapter of the Framework Element. Objectives and policies in the Land Use Chapter generally promote an improved quality of life by facilitating a reduction of vehicular trips, VMT, and air pollution through increasing density within proximity of transit stations, emphasizing pedestrians and bicycle use. The Project would contribute to the concentration of mixed-use development within an area that is well served by existing transit, including being within 1,500 feet of multiple local and regional bus lines, and the future Wilshire/La Cienega Metro D (Purple) Line Station, thereby contributing to the spatial distribution of land uses that can reduce VMT and air emissions. The Project would provide ground floor commercial and medical office uses that would provide additional services to

adjacent neighborhoods in a more inviting and accessible site configuration than currently exists on the Project Site, which is currently occupied by low-rise commercial uses. The Project would contribute to the pedestrian experience through the provision of ground floor uses, direct sidewalk access and landscaping, including street trees to add to the shade and comfort along the public sidewalk. These Project characteristics would encourage pedestrian activity. This, in combination with the provision of 716 bicycle parking spaces for short- and long-term use and bicycle support facilities, would encourage bicycle access and use by Project-related employees and visitors, and would support these objectives and policies.

(b) Urban Form and Neighborhood Design
Chapter

As it relates to the Urban Form and Neighborhood Design Chapter of the Framework Element, the policy applicable to the Project (Policy 5.2.2) encourages the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. The Project would support this policy as the Project would provide new medical office and commercial uses in a multi-story building within an area that is characterized by mid- to high- rise commercial buildings along South San Vicente Boulevard and Wilshire Boulevard. The Project Site is located in an area that is served by multiple bus lines and the future Wilshire/La Cienega Metro D (Purple) Line Station. The commercial uses would support the needs of the Project's visitors and employees, as well as the residents in the neighborhood.

(c) Conclusion

Accordingly, and as further described in Appendix G of this Draft EIR, the Project would not conflict with applicable objectives and policies of the Framework Element, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the Framework Element would be less than significant.

(ii) *Conservation Element of the City of Los Angeles General Plan*

As noted above, the City's Conservation Element primarily addresses preservation, conservation, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resources areas. As discussed in the Initial Study, provided in Appendix A of this Draft EIR, the Project would have no impacts on agricultural lands, endangered species, habitat areas, or mineral resource areas. The Initial Study also provides an analysis related to scenic vistas. As discussed therein, the Project would not obstruct existing public views of any scenic vistas or visual resources. Therefore, the Project would not conflict with

Section 15 of the Conservation Element establishes the objective and policy of the protection of natural and scenic vistas as aesthetic resources.

As it relates to archaeological resources, analyzed in **Section IV.B, Cultural Resources**, of this Draft EIR, and paleontological resources, analyzed in **Section IV.D, Geology and Soils**, of this Draft EIR, with implementation of mitigation measures, impacts to archaeological resources and paleontological resources would be reduced to less than significant levels. Therefore, the Project would not conflict with Section 5 of the Conservation Element.

As the Project would not conflict with applicable goals of the Conservation Element, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the Conservation Element would be less than significant.

(iii) *Plan for a Healthy Los Angeles*

Plan for a Healthy Los Angeles introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The Project would prioritize safety and access for all individuals utilizing the site by complying with all ADA requirements and providing direct connections to pedestrian amenities at adjacent intersections. Further, the Project would support healthy lifestyles by locating jobs adjacent to transit (Metro and AVTA bus lines, as well as a future rail line), providing bicycle amenities, and enhancing the pedestrian environment by providing shade trees and other landscape elements for a more comfortable environment for pedestrians. Therefore, the Project would not conflict with the Plan for a Healthy Los Angeles.

(iv) *Wilshire Community Plan*

The Wilshire Community Plan is the official guide to future development within the Community Plan area. Table LU-3, *Comparison of the Project to Applicable Objectives of the Wilshire Community Plan*, provided in Appendix G of this Draft EIR, evaluates the consistency of the Project with applicable objectives of the Wilshire Community Plan. The Wilshire Community Plan includes policies and objectives related to a variety of topics including commercial, police protection, fire protection, and historic and cultural resources. The following summarizes the analysis provided in Table LU-3.

As discussed in Table LU-3, as it related to policies governing commercial uses, the Project would not conflict with Policy 2.2-1 of the Wilshire Community Plan, which encourages pedestrian-oriented design, including ground floor commercial spaces that would be accessible from the public sidewalk on South Sweetzer Avenue and South San Vicente Boulevard. In addition, the Project limits driveways to Orange Street and the alley, which would reduce potential conflicts with

pedestrians and automobiles, and repair of public sidewalks, ground-floor landscaping and street tree plantings to provide comfort and security for the pedestrian. The Project would also not conflict with Policy 2.2-3, which encourages the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed-use projects located in the same Neighborhood District, as the Project would include ground-floor commercial spaces that would accommodate retail and/or restaurant uses.

The Project would also not conflict with the objectives and policies related to police protection. The Project would not conflict with Objective 8-2, because it improves the ability of the community and police department to minimize crime and provide adequate security for all surrounding residents, and with related Policy 8-2.2, because it improves security around residential and commercial buildings. Specifically, Project entryways and pathways would be well-lit and well-marked for security and safety. Building identification signage and wayfinding signage for vehicular and pedestrian entries to the building would direct the flow of people and decrease opportunities for crime. Windows along the commercial spaces and building lobby entrance would allow for natural surveillance, as well as upper floor balconies and landscaped decks with glass guardrails. The Project would also implement Project Design Feature POL-PDF-2, which would require implementation of a variety of security features during operation, including gates entries for the parking structure and controlled keycard access to medical office spaces as well as the provision of security lighting and closed circuit TV monitoring (CCTV). Further analysis of the development of the Project and impacts related to police protection services is provided in **Section IV.H.2, Public Services – Police Protection**, of this Draft EIR.

The Project would not conflict with the objectives and policies for fire protection. The Project would not conflict with Objective 9-1, because it maintains fire facilities and protective services that are sufficient for the existing and future population and land use, and with related Policy 9-1.1, because it provides for coordination with the City of Los Angeles Fire Department (LAFD) during review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands. **Section IV.H.1, Public Services – Fire Protection**, of this Draft EIR, provides analysis of development of the Project and the impacts to fire protection services and facilities. As discussed therein, during construction, the Project would implement Construction Traffic Management Plan, as part of Project Design Feature TRAF-PDF-2, which would be implemented to minimize disruptions to traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. During operation, the Project would comply with applicable regulatory requirements, including LAFD's fire/life safety inspection for new construction projects, and would ensure that adequate fire prevention features would be provided, which would reduce demand on LAFD facilities and equipment. In addition, the Project also requested an information request letter from LAFD, which was provided on February 7, 2020. A

response was provided by LAFD on September 24, 2020. As provided in this response letter, while the development of the Project may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities, with the inclusion of the recommendations provided by LAFD in their response letter and provided in further reviews of the Project's design, such as LAFD's fire/life safety inspection, the Project's impacts would be less than significant. As the Project would comply with all requirements and recommendations from LAFD, discussed further in **Section IV.H.1, Public Services – Fire Protection**, of this Draft EIR, the Project's impacts to fire protection services were determined to be less than significant.

The Project would not conflict with the objective related to transportation. Specifically, Objective 11-2 supports pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers. The Project would improve pedestrian amenities and activate the pedestrian environment by repairing the public sidewalk, adding street trees, and adding commercial spaces adjacent to South San Vicente Boulevard. The Project Site is located within walking distance of bus and rail transit lines, including the future Wilshire/La Cienega Metro D (Purple) Line station, and is within walking distance to similar uses located at Cedars Sinai Medical Center and three metro stops away from UCLA Medical Center along the future Metro Purple Line Extension. This further promotes access between the Project Site and surrounding uses, in support of this Objective. As it relates to Objective 12-1, which is an objective to pursue Transportation Demand Management Strategies that maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips, the Project would include implementation of a Transportation Demand Management (TDM) Program as part of Project Design Feature TRAF-PDF-1. The TDM Program would include strategies that would encourage employees and patrons of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program, which serve to support of this Objective. The Project would not conflict with Objective 16-2, because the Project ensures that location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure. The Project would construct a mixed-use building consisting of up to 145,305 square feet of development in an area well-served by regional freeways, highways, and bus and rail lines. Refer to **Section IV.I, Transportation**, of this Draft EIR, for an analysis regarding the Project's consistency with programs, plans, ordinances, and policies addressing the circulation system. As analyzed therein, the Project would not conflict with these programs, plans, ordinances, and policies adopted for the purpose of avoiding or mitigating a significant environmental effect and impacts were found to be less than significant.

The Wilshire Community Plan also includes objectives and policies related to historic and cultural resources. The Project would not conflict with Objective 17-2,

because the Project preserves and enhances neighborhoods having a distinctive and significant historical character. As discussed in **Section IV.B, Cultural Resources**, and analyzed further in the Historical Resources Assessment provided in Appendix C of this Draft EIR, the existing building on the Project Site that was formerly a school does not qualify as a historic resource. While it exceeds the age threshold for a historical resource, the building lacks significance and does not possess architectural merit. In addition, impacts to the 11 potential off-site historical resources were analyzed and it was found that these potential off-site historical resources would retain their eligibility as historical resources upon Project completion.

Because the Project would not conflict with applicable policies of the Wilshire Community Plan, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to Wilshire Community Plan would be less than significant.

(c) *City of Los Angeles Municipal Code*

Table LU-4, *Comparison of the Project to Applicable Land Use Regulations of the LAMC*, evaluates the consistency of the Project with applicable provisions of the LAMC governing land use and planning. The following summarizes the analysis provided in Table LU-4.

The Project proposes a General Plan Amendment from Limited Commercial to Regional Center Commercial and Vesting Zone Change and Height District Change from C1-1VL-O to (Q)C2-2D-O to allow for the proposed building height and floor area. The proposed zoning for the Project would include a “D” Limitation that would limit the maximum FAR to 4.5:1 and the height to 230 feet to the top of the mechanical penthouse, and support commercial uses on the ground level, consistent with zoning on adjacent properties. Although the Project would result in a building height that is taller than what the current zoning would allow, which would be limited to three stories and 45 feet in height, the proposed 12-story medical office building would be compatible with development along South San Vicente Boulevard and Wilshire Boulevard, which is characterized by a mix of mid- to high- rise buildings, including a 10-story office building with ground floor commercial uses directly across from the Project Site, a 22-story medical office building fronting Wilshire Boulevard to the southeast of the Project Site, and a 12-story office building to the east of the Project Site. The intensity and scale of the development would be offset by the pedestrian orientation of the ground floor, which creates a human scale at the ground level, and the visible upper story landscape decks and unique building design, which would serve to create visual interest. In addition, the building is designed with stepped terraces to break up the building’s massing.

With regard to setbacks, with the vesting zone change from C1 to the proposed zoning C2, there are no yard requirements applicable to the Project No building

setbacks are required for non-residential project in the C Zone. As such, the Project's proposed zero-foot front yard, side yard, and rear yard setbacks of zero would be consistent with this proposed zoning.

Site Plan Review is required for the addition of 50,000 square feet or more of non-residential floor area, or a net increase of 1,000 or more average daily trips. As the Project would include the addition of approximately 145,305 square feet of medical office and commercial floor area, Site Plan review would be required and would therefore be obtained as part of the entitlement process.

As it relates to vehicle and bicycle parking requirements, and as described further in **Chapter II, Project Description**, of this Draft EIR, pursuant to LAMC Section 12.21 A.4(c), the combination of medical office and retail-restaurant uses would require a total of 746 vehicle parking spaces. Pursuant to LAMC Section 12.32 P, the Project is requesting a reduction in parking not to exceed 20 percent, incident to a legislative action, reducing the required vehicle parking to a total of 597 spaces. Pursuant to LAMC Section 12.21 A.16, the Project would be required to provide 15 bicycle parking spaces. However, pursuant to LAMC Section 12.21 A.4(c), non-residential projects within a TPA may replace up to 30 percent of the required automobile parking spaces, or a reduction of 179 vehicle parking spaces, with bicycle parking at a rate of four bicycle parking spaces per vehicle parking space, thereby, further reducing the required vehicle parking spaces by 179 spaces. As such, the Project would provide a total of 716 bicycle parking spaces and 418 vehicle parking spaces.

The Project would comply with permitted uses in proposed C2 Zone, setbacks, and other LAMC requirements. With approval of the requested discretionary actions, the Project would not conflict with the provisions of the LAMC governing land use and planning adopted for the purpose of avoiding or mitigating a significant environmental effect, and impacts with respect to provisions of the LAMC governing land use and planning would be less than significant.

(d) Citywide Design Guidelines

The Citywide Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The design guidelines are organized around Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Pedestrian-First Design. The Project would include accessible sidewalks, pedestrian amenities, and vehicular access driveways designed in accordance with the City's design considerations. The Project would provide street trees and sidewalk plantings uniformly within the sidewalk to provide adequate shade, as well as a more comfortable environment for pedestrians. Further, the orientation

of the Project design and active ground floor facilities would ensure that the Project actively engages with the street and its surrounding uses.

360-Degree Design. The Project design also includes elements that reinforce orientation to the street, such as glass windows and an easily recognizable entrance. The Project would provide landscaped spaces along South San Vicente Boulevard, Orange Street, and Sweetzer Avenue, enhancing the overall appearance and user experience of the Project Site. Further, all design elements of the Project would be developed in conjunction with the others to ensure consistency of the architectural ideas.

Climate Adapted Design. The Project would also incorporate elements of shade, natural light, and ventilation as considerations in the building orientation and design. Further, the Project would include trees and landscaped spaces that allow water to percolate into the ground and offer ecological enhancements and shaded spaces for community benefits.

Based on the above, the Project would not conflict with the Citywide Design Guidelines related to 360-Degree Design and Climate Adapted Design.

(e) *Conclusion*

Based on the analysis of Project consistency with applicable goals and policies of SCAG's 2020-2045 RTP/SCS; the City's General Plan, including the Framework Element, Conservation Element, Plan for Healthy Los Angeles, and Wilshire Community Plan; LAMC; and Citywide Design Guidelines, the Project would not conflict with the relevant land use policies adopted for the purpose of avoiding or mitigating a significant environmental effect.

Approval of the Project's requested entitlements, including the General Plan Amendment, Vesting Zone Change, Height District Change, Site Plan Review and related findings and conditions to ensure compatibility with surrounding land uses would bring the Project into consistency with the Framework Element, Wilshire Community Plan, and LAMC. **As such, with the approval of the proposed entitlements, the Project would be consistent with and not conflict with applicable plans and regulations adopted for the purpose of avoiding or mitigating a significant environmental effect. Therefore, impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding land use and planning would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies four related projects (two in the City of Los Angeles, one in the City of Beverly Hills, and one, the Metro Purple Line Extension, which is in both the City of Los Angeles and the City of Beverly Hills). Of the four related projects, two related projects are planned or are under construction within the Wilshire Community Plan area that is within 0.25 miles of the Project Site. There is also one related project within the adjacent City of Beverly Hills that is within 0.25 miles of the Project Site. In addition, one infrastructure project, the buildout of the Metro Purple Line Extension, is also included as a related project and would occur within proximity of the Project Site. The related projects within the Wilshire Community Plan and City of Beverly Hills are concentrated along major thoroughfares within the Wilshire Community Plan area including La Cienega Boulevard and Wilshire Boulevard and all are on properties designated for commercial uses, as identified in the Framework Element. These designations are intended for higher density development. The commercial designations accommodate a wide range and mix of uses, including multi-family housing, office space, retail, hotel, restaurant services, and entertainment activities at densities that support the development of a comprehensive and inter-connected network of public transit and services. The proposed related projects include mixed-use residential and commercial uses and hotel uses, which would be consistent with the commercial nature of the area. In addition, the buildout of the Metro Purple Line Extension points to an evolving area and would serve to address goals and policies of the 2016-2040 RTP/SCS, Framework Element, Wilshire Community Plan, and LAMC related to a reduction of VMT and GHG emissions.

The Project Site is located within a TPA as designated by the City in response to Senate Bill 375. The Project would contribute to the concentration of mixed-use infill development within a TPA and within convenient access to the future Wilshire/La Cienega Metro D (Purple) Line Station, which will be located 1,500 feet from the Project Site. The related projects are also concentrated along key transportation corridors (i.e., Wilshire Boulevard) and within TPAs, and are either mixed-use in nature or include commercial uses that would be well-served by the transit options in the vicinity. While these related projects would increase density in the area, the related projects, similar to the Project, would be evaluated for consistency with existing and proposed zoning and land use designations for given properties.

The Project, together with the related projects, which include the development of 143 dwelling units, 11,685 square feet of commercial uses, and 200 hotel rooms, would provide a range of much needed housing and high-quality neighborhood and visitor-serving commercial/retail uses concentrated within major thoroughfares within the Wilshire Community Plan area. These types of developments are anticipated and encouraged by the Wilshire Community Plan; as such, the related projects would not conflict with the applicable plans and goals to concentrate high-density, mixed-use development in TPAs. **Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and the Project, considered together with related projects, would not result in cumulative significant impacts related to land use and planning. Therefore, cumulative impacts would be less than significant.**

(2) Mitigation Measures

Cumulative impacts to land use and planning would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

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