IV. Environmental Impact Analysis

G. Land Use

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Specifically, Section IV.A, Air Quality, evaluates Project consistency with the South Coast Air Quality Management Plan.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- North Hollywood–Valley Village Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- NoHo Commercial and Arteraft District Overlay

(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 RTP/SCS

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is

integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a 5-percent reduction in VMT per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in high-quality transit areas (HQTA)¹ by 6 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),² 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,³ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the 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.

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¹ HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

² City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, https://planning.lacity.org/plans-policies/general-plan-overview, accessed March 1, 2021.

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 City of Los Angeles General Plan Framework Element (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.

(1) Land Use Chapter

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

(2) Housing Chapter

The overarching goal of the Framework Element's Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The General Plan Framework 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.

(3) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.4 The General Plan Framework does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(4) Open Space and Conservation Chapter

The Framework Element's 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.

(5) Economic Development Chapter

The Framework Element's Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The

City of Los Angeles General Plan Framework, page 5-1, et. seq.

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.

(6) Transportation Chapter

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

(7) Infrastructure and Public Services Chapter

The Framework Element's 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, adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan

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 (AB 1358).

The purpose of the Mobility Plan 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 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 includes the following five main goals that define the City's high-level mobility priorities:⁵

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

(iii) Conservation Element

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

(iv) Housing Element

The Housing Element of the General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional

⁵ Los Angeles Department of City Planning, Mobility Plan 2035, amended September 2016.

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 results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels;
- A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- A City committed to ending and preventing homelessness.⁶
 - (v) 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. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5, An Environment Where Life Thrives*, which identifies the following environmental policies:

 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.

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⁶ City of Los Angeles, Los Angeles Housing Element 2021–2029, p. 242.

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

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

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

(vi) North Hollywood–Valley Village Community Plan

The Project Site is located within the North Hollywood–Valley Village Community Plan (Community Plan) area. Adopted on May 14, 1996, the Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the General Plan Framework Element. The specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community. In addition, the Community Plan is intended to coordinate development among the various communities of the City and adjacent municipalities in a fashion bot beneficial and desirable to the residents of the community.⁸

As shown in Figure IV.G-1 on page IV.G-10, the existing Community Plan land use designations for the Project Site and Off-Site Metro Parking Areas are Community

The Los Angeles Department of City Planning is currently preparing the Southeast Valley Community Plan Update, which includes the North Hollywood–Valley Village Community Plan area (see https://planning.lacity.org/plans-policies/community-plan-update/southeast-valley-community-plan-update). As of March 2022, a draft of the revised community plan has not been released. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Community Plan.



Figure IV.G-1

Land Use Designations on the Project Site and Off-site Metro Parking Areas

Source: City of Los Angeles ZIMAS (http://zimas.lacity.org/); Eyestone Environmental, 2020.

Commercial, Commercial Manufacturing, and Public Facilities. Within the Community Plan area, the Project is also located within the NoHo Commercial and Artcraft District, which is discussed further below.

(b) Los Angeles Municipal Code

All development activity on the Project site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. As shown in Figure IV.G-2 on page IV.G-12, the Project Site and Off-Site Metro Parking Areas include multiple zones, including C4-2D (Commercial, Height District 2), C4-2D-CA (Commercial, Height 2, Commercial and Artcraft District), C2-2D-CA (Commercial, Height District 2, Commercial and Artcraft District), CM-1VL (Commercial, Height District 1VL), and PF-1VL (Public Facilities, Height District 1VL). designation permits C2 uses with limitations that include but are not limited to various retail and restaurant spaces, hotels, parks, playgrounds, parking garages, automotive service stations, churches, clinics, theaters, and schools, as well as R4 uses (multiple dwelling). The CM designation permits limited C2 uses that include but are not limited to wholesale, storage, clinics, and limited manufacturing, as well as R3 uses (multiple dwelling). The purpose of the PF (Public Facilities) zone is to provide regulations for the use and development of publicly owned land. The PF designation includes a wide array of uses that include but are not limited to agricultural uses, fire and police stations, government buildings, public libraries, post offices, public schools and joint public and private Where zoning includes the CA suffix, the CA designation indicates a particular portion of the Project Site and/or Off-Site Metro Parking Areas are located within a Commercial and Artcraft District (discussed further below) where artistic activities, combined with commercial and residential uses are permitted. A Specific Plan is proposed for the Project Site which would govern zoning within its boundaries.

(c) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the 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



Figure IV.G-2

Zoning Designations on the Project Site and Off-site Metro Parking Areas

Source: City of Los Angeles ZIMAS (http://zimas.lacity.org/); Eyestone Environmental, 2020.

guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

(d) NoHo Commercial and Artcraft District Overlay

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

The NoHo Commercial and Artcraft District Overlay (Artcraft District) was created with the adoption of Ordinance 170549, which took effect July 16, 1995. The purpose of the district is to create enclaves where artists can live, create, and market their work. Within the Artcraft District, various artistic activities including, but not limited to, the restoration and sale of antiques and collectibles; basket weaving; candle making; ceramics; dance and drama; photography; woodcarving; jewelry manufacturing; printing and publishing; and watchmaking are permitted. Artcraft classes are also permitted within the district.

b. Existing Conditions

(1) Project Site and Off-Site Metro Parking Areas

As discussed in Section II, Project Description, of this Draft EIR, the 15.9-acre Project Site includes four sub sites located generally north/east and south/west of Lankershim Boulevard. The East Site is comprised of 46 lots totaling approximately 10.7 acres located east of Lankershim Boulevard and is currently improved with the Metro B (Red) Line subway east portal, a surface parking lot, and a local bus plaza. The South, Central, and Northwest Sites are located west of Lankershim Boulevard. The South Site is comprised of 12 lots totaling approximately 1.8 acres and improved with a surface parking lot adjacent to a restaurant. The Central Site is comprised of two lots totaling approximately 2.7 acres and improved with industrial/warehouse buildings, the G (Orange) Line Bus plaza, the B (Red) Line subway west portal, and the Lankershim Depot Building. The Northwest Site is comprised of seven lots totaling approximately 0.7 acre and improved with one- and two-story industrial/warehouse buildings. The existing uses are located within one- and two-story buildings that total approximately 25,145 square feet of

floor area.⁹ In total, 1,098 surface parking spaces are located on the Project Site. Landscaping within and surrounding the Project Site is limited to trees and shrubs throughout the surface parking areas, along the adjacent roadways, and around some building perimeters.

The Project also includes the two Off-Site Metro Parking Areas. The West Lot is currently occupied by industrial/warehouse buildings totaling 25,691 square feet and surface parking. The East Lot is an existing surface parking lot for Metro riders. Landscaping within and surrounding the Off-Site Metro Parking Areas is limited to trees and shrubs throughout the surface parking areas, along the adjacent roadways, and around some building perimeters.

As previously discussed, and as shown above in Figure IV.G-1 on page IV.G-10, under the Community Plan, the existing Community Plan land use designations for the Project Site and Off-site Metro Parking Areas are Community Commercial, Commercial Manufacturing, and Public Facilities. The Project Site and Off-Site Metro Parking Areas are zoned by the LAMC as C4-2D (Commercial, Height District 2), C4-2D-CA (Commercial, Height 2, Commercial and Artcraft District), C2-2D-CA (Commercial, Height District 2, Commercial and Artcraft District), CM-1VL (Commercial Manufacturing, Height District 1VL), and PF-1VL (Public Facilities, Height District 1VL). A generalized zoning map is provided in Figure IV.G-2 on page IV.G-12. The Project is also located within a SCAG-designated HQTA and TPA pursuant to PRC Section 21099 and is designated Regional Center under the General Plan Framework.

(2) Surrounding Uses

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site and Off-Site Metro Parking Areas is characterized by a variety of uses, including a car dealership, residential uses, and surface parking to the north; a theatre, recording studio, restaurant, commercial, and residential uses to the south; residential uses to the east; and commercial uses and a United States Post Office to the west. In addition, Lankershim Elementary School is located approximately 200 feet south of the Project Site on Bakman Avenue; East Valley High School is located approximately 0.2 mile northeast of the Project Site on Vineland Avenue; and Amelia Earhart High School is located approximately 0.6 mile west of the Project Site on Colfax Avenue. A Greyhound Bus station is also located approximately 0.2 mile south of the Project Site on Magnolia Boulevard. The North Hollywood Park, which includes both

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On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

indoor and outdoor recreation facilities, is also located approximately 500 feet west of the Project Site at the southwest corner of Tujunga Avenue and Chandler Boulevard.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community;

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

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

(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 types 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.

As discussed below, the Project's potential impact regarding a physical division of an established community was evaluated in the Initial Study included in Appendix A of this Draft EIR. As such, this Appendix G Threshold and any corresponding criteria included in the City's L.A. CEQA Thresholds Guide is not further evaluated herein.

b. Methodology

(1) Physically Divide a Community

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

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

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

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

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. 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.¹⁰ 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. Specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.¹¹

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 evaluated in the Initial Study prepared for this Project and included as Appendix A of this Draft EIR, the Project Site includes parcels located generally north/west and east/south of Lankershim Boulevard. The Project Site and Off-Site Metro Parking Areas are currently developed with the Metro North Hollywood Station, industrial/warehouse uses, and surface parking. The Project would replace the existing surface parking and industrial/warehouse uses with a mixed-use development and enhanced transit facilities. These uses would be consistent with the adjacent uses in the community. In addition, through access would be maintained throughout construction and operation of the Project, and access to both sides of Lankershim Boulevard from adjacent properties would continue to be available. Furthermore, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. The Project would, in fact, remove existing barriers between communities on either side of the Project Site and Off-Site Metro Parking Areas through the development of new streets connecting to the existing street grid, as well as providing a pedestrian-friendly development on the Project Site. Therefore, the Project would not physically divide an established community. Therefore, as determined in the Initial Study, the Project would not physically divide an established community, and impacts with respect to Threshold (a) would be less than significant. No further analysis is required.

Office of Planning and Research (OPR), State of California General Plan Guidelines (2017)

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

Threshold (b): Would the Project 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?

(1) Impact Analysis

(a) Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the applicable goals, objectives, and policies of the General Plan, including the Framework Element, the Mobility Plan, Conservation Element, Housing Element, and the Health and Wellness Element; the Community Plan; and the Citywide Design Guidelines.

(i) Los Angeles General Plan

(1) City of Los Angeles General Plan Framework Element

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

(a) Land Use Chapter

As detailed in Table 1 of Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support and would be consistent with the Land Use Chapter's goal to provide a physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city. Specifically, the Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by providing mixed income multifamily units, commercial uses, and office uses. The Project would also retain and relocate an existing historic resource on-site. In addition, development of the Project in an area with convenient access to public transit, including the Metro North Hollywood Station

which is served by the G (Orange) Line busway and B (Red) Line subway located on the Project Site, as well as Metro local bus lines, LADOT Commuter Express, Santa Clarita Transit, and the Burbank Bus. These public transit lines and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle-miles traveled (VMT), and air pollution, while supporting the City's objective to encourage new multi-family residential, retail, restaurant, and office uses along primary transit corridors/boulevards and in designated Regional Centers. The Project also includes a General Plan Amendment to designate the Project Site a Regional Center under the Community Plan, which would align with the Framework Element's designation.

The Project would provide new open space opportunities for existing and future residents. The Project would provide 211,280 square feet of open space within the Project Site in accordance with the Project's proposed Specific Plan, 87,225 square feet of which would be publicly accessible, privately operated and maintained. In addition, the Project's street frontages would provide street lighting, street trees, street furniture, new parkways, new sidewalks and pedestrian connections in furtherance of streetscape regulations to be developed as part of the Project's proposed Specific Plan. These improvements, along with the publicly accessible plazas, would promote a pedestrian-friendly environment.

The Project would be located within an area of the City supported by adequate transportation and utility infrastructure and public services. Specifically, as detailed in Section IV.I, Population and Housing, 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.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(b) Housing Chapter

As detailed in Table 1 of Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element's Housing Chapter adopted for the purpose of avoiding or mitigating an environmental effect. The Project would support the City's objective to encourage the location of new multi-family housing in proximity to transit stations, through the development of 1,527 multi-family residential units comprised of 1,216 market rate units and 311 affordable units, representing 20 percent of the total proposed residential units. The 1,527 residential units would include 441 studio units, 708 one-bedroom units, 299 two-bedroom units, and 79 three-bedroom units. The proposed housing would be located in an area well-served by public transit including the on-site Metro North Hollywood Station, which is served by the G

(Orange) Line busway and B (Red) Line subway, as well as Metro local bus lines, LADOT Commuter Express, Santa Clarita Transit, and the Burbank Bus. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Housing Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Open Space and Conservation Chapter

As detailed in Table 1 of Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element's Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the City's goal of providing a citywide regional public and private open space system by providing 211,280 square feet of open space within the Project Site in accordance with the Project's proposed Specific Plan, 87,225 square feet of which would be publicly accessible, privately operated and maintained (see the discussion of the Promenade, Transit Square, and NoHo Square below). The ground-floor open space in Blocks 0 East and 5/6 would offer a publicly-accessible destination that is safe, comfortable, and convenient. Like traditional squares and plazas, seating would be aggregated along the development for dining, shopping, and gathering.

The center of the Project Site would feature the publicly accessible Promenade, Transit Square, and NoHo Square. The Promenade would provide approximately 27,160 square feet (approximately 0.62 acre) of open space, located in Block 5/6. An urban tree canopy would provide shade and framing of such space along the edges of the Lankershim Boulevard and Chandler Boulevard intersection. The Transit Square in Block 0 East would consist of approximately 39,590 square feet (approximately 0.91 acre) of open space. The Transit Square would also feature a retail area along with several planted areas and seating designed to facilitate safe and convenient access to the Metro east portal, socialization, and pedestrian activity. NoHo Square in Block 5/6 would consist of approximately 20,475 square feet (approximately 0.47 acre) of open space that would continue the Promenade urban tree canopy, provide an open lawn, and include both fixed and movable seating areas. NoHo Square would be surrounded by buildings and is intended to foster interaction amongst residents, office workers, transit riders, and pedestrians.

The Project's residential, retail, and office buildings would be located adjacent to the Promenade, Transit Square, and NoHo Square, allowing residents and pedestrians to walk outside directly into a large plaza space. Trees and landscaping are proposed at various buildings throughout the Project Site, creating a series of publicly accessible open spaces that would serve as neighborhood assets and gathering places for the residents and the North Hollywood community. Planting would be present at upper floors and along terrace

edges, expanding the landscape that would be seen and experienced from the ground level. Also, as discussed above, amenities would be located throughout multiple floors within the proposed residential buildings, including pools, outdoor dining areas, landscaped park spaces, and shaded seating areas. The Project would also establish a network of smaller open spaces activated by transit riders, workers, visitors, and residents alike.

Furthermore, the Project would incorporate elements that promote individual and community safety throughout the Project Site, including open space areas that are well-lit and equipped with a range of security measures to ensure public safety and security for residents, visitors, Metro riders, and pedestrians. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(d) Economic Development Chapter

As detailed in Table 1 of Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the City's objective to establish a balance of land uses through the development of a mixed-use project with residential, retail, restaurant, and office uses in an area well-served by public transit. community-serving retail, restaurant, office uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Community Plan area, provide amenities to meet the needs of local residents, and serve to reduce VMT by locating housing and jobs on a Project Site that includes the Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway, as well as bus stops for Metro local bus lines, LADOT Commuter Express, Santa Clarita Transit, and the Burbank Bus. The Project would also support the City's objective to 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 by providing 1,527 dwelling units comprised of 441 studio units, 708 1-bedroom units, 299 2-bedroom units, and 79 3bedroom units, including affordable units, in a mixed-use corridor well served by public transit, as detailed above. Thus, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Economic Development Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(e) Infrastructure and Public Services Chapter

As detailed in Table 1 of Appendix K of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the City's policy and objectives pertaining to effective and efficient approaches to protecting water quality by implementing a SWPPP during construction that would include BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff onsite before discharging into the municipal storm drain system as part of the SUSMP. Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Furthermore, as discussed in Section IV.M.1, Utilities and Service Systems— Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area and the Project would not conflict with the City's objective to ensure that water supply, storage, and delivery systems are adequate to support planned development. In addition, as discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would not exceed wastewater treatment requirements of the LARWQCB, and LASAN has determined that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(f) Conclusion

Based on the analysis above, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element adopted specifically to mitigate or avoid an environmental impact.

(2) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 2 of Appendix K of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals, objectives, and policies of the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect.

The Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts

between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. While temporary relocations for loading and unloading during construction would be required, access to Metro facilities including B (Red) Line portal (either east or west) and G (Orange) Line terminus would be maintained throughout the construction period. The Project would ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

During operation, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle facilities. Specifically, the Project would include up to 1,158 bicycle parking spaces for Project uses throughout the Project Site. The Project would also provide up to 166 Metro Bike Hub bicycle parking The Project would also enhance pedestrian activity in the area by spaces on-site. providing 87,225 square feet of publicly accessible plazas, with seating and access to the Project's proposed retail and restaurant uses and by improving the Project's street frontages with street lighting, street trees, street furniture, new parkways, new sidewalks, New trees and landscaping would also be provided and pedestrian connections. throughout the Project Site. Additionally, given the location of the Project Site along and in proximity to major transit corridors, including the on-site Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway within the Project Site, the Project would provide all residents, guests, employees, and patrons of the on-site uses convenient access to transit services and reduce VMT by providing greater proximity to jobs, destinations, and other neighborhood services. The Project would also include Transportation Demand Management (TDM) features such as reduced parking supply, and marketing. pedestrian network improvements, traffic promotions improvements, on-street bicycle facility improvements, and bicycle parking in accordance with the proposed Specific Plan, which would serve to reduce vehicle trips. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted specifically to mitigate or avoid an environmental impact.

(3) Los Angeles General Plan Conservation Element

As identified in Subsection 2.a.(1)(a)(ii), the Conservation Element addresses the preservation, conservation, protection, and enhancement of the City's natural resources and recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Project's consistency with the Conservation Element is analyzed below.

The Project would not conflict with the City's goal to preserve, protect, and enhance its existing natural resources or its objective to preserve, protect, restore, and enhance natural plant and wildlife diversity, habitats, corridors, and linkages. The Project Site is currently developed with the Metro North Hollywood Station, industrial/warehouse uses,

and surface parking areas. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area and landscaping within the Project Site is limited. A total of 280 living trees and 15 dead trees were inventoried for the Project. Two coast live oak trees were identified at the northeast corner of Lankershim and Chandler Boulevards. However, both oak trees were planted as part of the Metro B (Red) Line construction in or around 1997 and are therefore not considered protected trees by the City's ordinance. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. In addition, the street trees to be removed would be replaced on a 2:1 basis, as required by the Department of Public Works. As discussed in the Initial Study included as Appendix A of this Draft EIR, due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site.

As discussed in Section IV.B, Cultural Resources, the Project Site includes one historic resource: the Lankershim Depot. The Depot would be relocated within the Project Site to accommodate upgrades to the Metro G (Orange) Line terminus. While retention of the Depot in its existing location was determined to be infeasible (see Section V, Project Alternatives), all feasible mitigation has been imposed, including that the relocation and rehabilitation of the Depot conform with the Secretary's Standards, its relocation would nevertheless result in a significant and unavoidable impact with respect to its relationship with the intersection of Lankershim and Chandler Boulevards. Consequently, the relocation of the Lankershim Depot would not be fully consistent with the City's objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element. As discussed above, under the Sequoyah Hills Homeowners Association v. City of Oakland court case, a Project is not required to be an exact match to the objectives and policies of the General Plan to not pose a conflict. Refer to Section IV.C, Cultural Resources, of this Draft EIR, for an analysis of the Project's impacts to historical resources.

(4) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is discussed in detail in Table 3 of Appendix K of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals, objectives, and policies of the Housing Element adopted for the purpose of avoiding or mitigating an environmental effect.

The Project would support the City's objective to promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit by providing a variety of housing types (i.e., studio, one-, two-, and three-bedroom units) in an area that is pedestrian-friendly and served by public transit. Specifically, the Project would develop 1,527 multi-family residential units comprised of 1,216 market rate units and 311 affordable units representing 20 percent of the total proposed residential units. The 1,527 residential units would include 441 studio units, 708 one-bedroom units, 299 two-bedroom units, and 79 three-bedroom units. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating the Project in a designated HQTA and TPA, with transit options including the on-site Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway located within the Project Site, as well as Metro local bus lines, LADOT Commuter Express, Santa Clarita Transit, and the Burbank Bus. The Project would also support the City's objective related to sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources by incorporating sustainable design features, including energy conservation, water conservation, alternative transportation programs, a pedestrian- and bicycle-friendly site design, and waste reduction measures. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Housing Element adopted specifically to mitigate or avoid an environmental impact.

(5) Health and Wellness Element

The Health and Wellness Element includes the goal to provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins. Under this goal, the Health and Wellness Element includes a policy to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health. The Project Site includes the Metro North Hollywood Station serving the B (Red) Line subway, G (Orange) Line busway, and numerous local and regional bus lines. The Project would also include TDM measures to reduce VMT pursuant to Project Design Feature TR-PDF-2 (refer to Section IV.K, Transportation, of this Draft EIR). In addition, the Project would encourage alternative transportation choices by improving the pedestrian experience in North Hollywood and providing up to 1,158 bicycle parking spaces on-site. As such, the Project would support the Health and Wellness Element's efforts to reduce

vehicle use through implementation of smart growth land use patterns, which would support the reduction of air pollution. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

(6) North Hollywood–Valley Village Community Plan

The Project's general consistency with the objectives and policies set forth in the Community Plan is discussed in detail in Table 4 of Appendix K of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

The Project would be generally consistent with the objectives and policies that support the goals of the Community Plan. The Project would support the City's objectives and policies to coordinate the development of the North Hollywood area with that of other parts of the City of Los Angeles and the metropolitan area. The Project would introduce 1,527 multi-family residential units, including 311 affordable units, that would provide needed housing in the Community Plan area and support the City's objective to provide multiple-dwelling units for those who cannot afford or do not desire to own their own home. The Project would support the City's objective to make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community Plan area by developing new residential and retail, restaurant, and office uses in North Hollywood. The proposed uses would be located in a designated HQTA and TPA, which would reduce VMT.

Furthermore, the Project would provide a variety of open space areas within the Project Site, supporting the City's objective to encourage open space for recreational uses. Specifically, the Project would provide 211,280 square feet of open space within the Project Site in accordance with the Project's proposed Specific Plan, 87,225 square feet of which would be publicly accessible, privately operated and maintained. The ground-floor open space in Blocks 1 and 5/6 would offer a publicly-accessible destination that is safe, comfortable, and convenient. Like traditional squares and plazas, seating would be aggregated along the development for dining, shopping, and gathering.

The Project would support the City's objective to make provisions for a circulation system coordinated with land uses and to encourage the expansion and improvement of public transit. Specifically, the Project would promote the use of public transit and reduce VMT by providing a mix of residential, retail, restaurant, and office uses on a Project Site that includes the Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway. The Project also includes enhancements to the G (Orange) Line Terminus property include the consolidation of Metro G (Orange) Line,

LADOT Commuter Express, as well as other local and regional bus lines in a single transit center; a Metro Bike Hub; new bus shelters; an employee break room; a security office; architectural and art inspired updates to and reconfiguration of the existing Metro west portal and the addition of a second west portal, which would provide pedestrian connections to the Metro B (Red) Line Station below. The Project would provide up to 3,313 vehicle parking spaces to support Project uses within subterranean and above ground parking areas and up to 1,158 bicycle parking spaces (970 long term and 188 short term) throughout the Project Site in accordance with the Project's proposed Specific Plan.

The Project would support the City's objective to improve the visual environment of the community and strengthen and enhance its image and identity. Specifically, as discussed above, the Project Site is currently developed with the Metro North Hollywood Station, industrial/warehouse buildings, and surface parking. The Project would replace the existing industrial/warehouse buildings and surface parking on the Project Site with a new, mixed-use development consisting of residential, retail, restaurant, and office uses, along with public and private open space and parking for both Project and Metro uses.

Therefore, the Project would not conflict with the goals, objectives, and policies set forth in the Community Plan adopted specifically to mitigate or avoid an environmental impact.

(ii) Citywide Design Guidelines

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

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

The Project would enhance the pedestrian experience of the Project Site by replacing industrial/warehouse buildings and surface parking, with a new, mixed-use development. Project improvements include street lighting, street trees, street furniture, new parkways, new sidewalks, and pedestrian connections. Existing sidewalks would also be brought up to Bureau of Engineering standards and made compliant with the Americans with Disabilities Act. The Project would also include 87,225 square feet of publicly accessible open space consisting of the Promenade, Transit Square, and NoHo Square. This open space would provide a safe, comfortable, and convenient publicly accessible destination. Like traditional squares and plazas, seating would be aggregated along the development for dining, shopping, and gathering.

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

The Project would include the removal of surface parking within the Project Site and develop new subterranean and aboveground parking areas. Pedestrian access to the buildings would also be provided along multiple points throughout the Project Site. Two existing neighborhood streets—Klump Avenue and Elmer Avenue—would be extended into the Project Site and unified with a new bisecting road, District Way, subdividing the existing block east of Lankershim Boulevard, where Metro parking is currently located, into five smaller pedestrian-friendly blocks. All buildings would have vehicular access off private streets, alley ways, and secondary streets. Therefore, the Project would serve to enhance the pedestrian environment.

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

As discussed above under Guideline 1, the Project would include street lighting, street trees, street furniture, new parkways, new sidewalks, and pedestrian connections. The Project would also include 87,225 square feet of publicly accessible open space consisting of the Promenade, Transit Square, and NoHo Square. This open space would provide a safe, comfortable, and convenient publicly accessible destination. Like traditional squares and plazas, seating would be aggregated along the development for dining, shopping, and gathering.

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

The Project Site is located in an urbanized area and is currently developed with the Metro North Hollywood Station, industrial/warehouse buildings, and surface parking. Landscaping is limited and no riparian or other sensitive natural community exists on the Project Site or in the surrounding area. As discussed in the Initial Study included as Appendix A of this Draft EIR, there are six off-site trees that could be affected by the Project. Two coast live oak trees were identified at the northeast corner of Lankershim and Chandler Boulevards. However, both oak trees were planted as part of the Metro B (Red) Line construction in or around 1997 and are therefore not considered protected trees by the City's ordinance. Both trees would be removed as part of the Project and replaced on a 2:1 basis, as required by the Department of Public Works. As further discussed in the Initial Study, in accordance with the Department of City Planning's policy, existing on-site trees to be removed would be replaced on a 2:1 basis, as required by the Department of Public Works.

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

Both the buildings and occupiable spaces have been sited to optimize solar exposure (both shade and sun) and optimize viewsheds defined by towers and podiums. Integral shading on facades as well as utilization of balconies to increase passive shading will reduce heat gain. Additionally, Blocks 3, 4, and 7 are utilizing a "punched window" system, limiting openings to maximize adherence to Title 24 requirements. Plenty of trees and green spaces will help cool the adjacent outdoor spaces. Plazas are placed where people will benefit from seasonal exposures or protection.

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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, consistent with regulatory requirements, the Project's Geotechnical Engineer has performed a site infiltration evaluation and has recommended the following BMPs to manage post-construction stormwater runoff and reduce the amount of pollutants entering the stormwater system:

- Promote evapotranspiration and infiltration, and the use of native and/or drought tolerant plants;
- Provide storm drain system stenciling and signage to discourage illegal dumping;
- Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system;
- Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles. (Recorded covenant and agreements for BMP maintenance are part of standard building permit approval processing); and
- Design post-construction structural or treatment control BMPs to infiltrate stormwater runoff. Such stormwater treatment facilities and systems would be designed to meet the requirements of the LID Manual.
 - (b) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The Project's general consistency with the applicable goals, objectives, and policies set forth in the 2020–2045 RTP/SCS is discussed in detail in Table 5 of Appendix K of this Draft EIR. As detailed therein, the Project would not conflict with the whole of applicable goals, objectives, and policies set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods as well as reducing GHG emissions by developing new residential, retail, restaurant, and office uses on a Project Site within a designated HQTA and TPA that is well served by public transit, including the on-site Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway, as well as Metro local bus lines, LADOT Commuter Express, Santa Clarita Transit, and the Burbank Bus. The Project would also provide for the development of diverse housing types in an area that is supported by multiple transportation options by providing 1,527 multi-family residential units, comprised of studio, one-, two-, and three-bedroom units. A total of 311 of these units, representing 20 percent of the total proposed residential density, would be affordable housing. In addition, the Project would provide up to 1,158 bicycle parking spaces for Project uses and up to 166 Metro Bike Hub parking spaces to promote the use of alternative transportation. Project would also enhance pedestrian activity in the area by providing 87,225 square feet of publicly accessible plazas, with seating and access to the Project's proposed retail and restaurant uses. New trees and landscaping would also be provided throughout the Project Site. Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the 2020-2045 RTP/SCS adopted specifically to mitigate or avoid an environmental impact.

(c) Conclusion

Based on the analysis provided above and in Appendix K of this Draft EIR, the Project would not result in a significant environmental impact as a result of conflict with policies, plans, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant.

(2) Mitigation Measures

The Project's impact with regard to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

Impact Analysis

(a) Physically Divide a Community

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 34 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses. As such, similar to the Project, the proposed construction associated with the related projects would be confined to the related project sites and would not physically divide a community. The uses proposed by the related projects, including multi-family residential, commercial, office, and hotel uses would also be compatible with the various developments planned throughout North Hollywood, as well as with existing uses. As such, cumulative impacts related to the physical division of a community would be less than significant.

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

As with the Project, the related projects would be required to comply with relevant land use policies and regulations. Therefore, as with the Project, the related projects would not conflict with applicable land use plans. Specifically, like the Project, related projects would be required to comply with certain regulations and City goals, objectives, and policies to reduce emissions during construction as well as using clean materials and energy efficient appliances, consistent with the City's Green Building Code. In support of the City's goal to reduce vehicle miles traveled, it is anticipated that related projects would also implement various methods to promote alternative modes of transportation, including providing bicycle parking spaces, which is a City requirement. **Overall, cumulative impacts related to conflict with land use plans would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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