

4.7 LAND USE and PLANNING

This section analyzes the consistency of onsite development with applicable City of Los Angeles and Southern California Association of Governments (SCAG) land use policies.

4.7.1 Setting

a. Current Land Use in the Project Site Vicinity. The project site encompasses approximately 5.66 acres at the northeast corner of Alameda Street and First Street on the edge of the Little Tokyo community, in the City of Los Angeles, County of Los Angeles. The site is immediately adjacent to the new Little Tokyo/Arts District Metro Gold Line station. Figure 2-2 in Section 2.0, *Project Description*, shows the location of the project site within the site vicinity.

Existing development on the project site includes a public parking lot and an approximately 19,500 square foot (sf) office building. Vehicular access to the site is currently available via a driveway off of Temple Street. Regional access to the site is provided by U.S. 101, Interstate 10 (I-10), Interstate 5 (I-5) and State Route 110 (Harbor Freeway).

Land uses surrounding the project site include a Department of Water and Power facility located across East Temple Street to the north of the site; a Veterans' Affairs Hospital located to the northwest of the site on the northwest corner of Alameda Street and East Temple Street; the Little Tokyo/Arts District Metro Gold Line station immediately adjacent to the west of the site; the Geffen Contemporary at the Museum of Contemporary Art (MOCA) and the Japanese American National Museum located across Alameda Street to the west of the project site; a restaurant and surface parking lot to the southwest of the site on the southwest corner of First Street and Alameda Street; multi-family residential buildings, a car wash and the Sogo/Chugokaya Hotel located across First Street to the south of the site; and the City's Emergency Operations Center and the Nishi Hongwanji Buddhist Temple located immediately east of the site. An aerial photo showing the land uses surrounding the project site is provided on Figure 2-4 in Section 2.0, *Project Description*.

b. Regulatory Setting. The project site is located within the jurisdiction of several regional planning organizations as well as the City of Los Angeles and governed by the City's General Plan and zoning regulations. At the regional level, the project site is located within the planning area of the Southern California Association of Governments (SCAG), the region's federally-designated metropolitan planning organization. The project site is also located within the South Coast Air Basin (SCAB); and therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As such, development on the project site is subject to SCAQMD's Air Quality Management Plan (AQMP). The project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). In addition, the project site is subject to the Congestion Management Plan (CMP) for Los Angeles County.

At the local level, development of the project site is guided by the General Plan of the City of Los Angeles, which is comprised of eleven elements¹ and 35 community plans, in addition to

¹ The General Plan Elements include the seven state mandated elements (Land Use, Open Space, Conservation, Housing, Noise, Safety, Transportation, and Land Use, comprised of the City's 35 community plans) and four optional elements (Historic Preservation and Cultural Resources, Infrastructure Systems, Air Quality, and Public Facilities and Services).



the City of Los Angeles Citywide General Plan Framework Element, which establishes the broad overall policy and direction for the entire General Plan. Within the General Plan Land Use Element, the Central City North Community Plan provides more specific land use policies that apply to a 2,005-acre area that includes the project site. All development activity onsite is subject to the applicable land use regulations of the Central City North Community Plan, the City of Los Angeles Planning and Zoning Code (City Zoning Code), and other applicable sections of the City of Los Angeles Municipal Code (LAMC).

Regional Plans.

Regional Comprehensive Plan and Guide. The 2008 Regional Comprehensive Plan (RCP) was accepted by SCAG in October of 2008 and serves as an advisory document for (voluntary) use by local governments in the SCAG region as an informational resource, and as a reference document for their use in developing plans and addressing local issues of regional significance.

The Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 and amended in 1996 by the member agencies of SCAG to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making. It includes input from each of the 14 subregions that make up the Southern California region (comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial and Ventura Counties). The project site is located within the City of Los Angeles subregion, which encompasses the entire City of Los Angeles. The RCPG serves as a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making with respect to the significant issues and changes, including growth management, that can be anticipated by the year 2015 and beyond. Adopted RCPG policies related to land use are contained primarily in Chapter 3 of the RCPG, entitled "Growth Management." The purpose of the Growth Management chapter is to present forecasts that establish the socio-economic parameters for the development of the Regional Mobility and Air Quality Chapters of the RCPG, and to address issues related to growth and land consumption by encouraging local land use actions which could ultimately lead to the development of an urban form that would help minimize development costs, save natural resources, and enhance the quality of life in the region. Impacts associated with air quality and regional mobility are discussed in sections 4.2, *Air Quality*, and 4.11, *Transportation/Traffic*, respectively.

Specific Growth Management Chapter policies are divided into four main categories: (1) growth forecasts; (2) improving the regional standard of living; (3) maintaining the regional quality of life; and (4) providing social, political and cultural equity. Growth Management policies that are relevant to onsite development are discussed under the "Project Impacts" subheading below.

South Coast Air Quality Management Plan. The project site is located within the South Coast Air Basin (SCAB) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The Final 2007 Air Quality Management Plan (AQMP) is intended to establish a comprehensive regional air pollution control program leading to the attainment of both state and federal air quality standards in the



SCAB.² The AQMP also includes significant new scientific data, emission inventories, ambient measurements, control strategies, and air quality modeling. The AQMP is discussed in greater detail in Section 4.2, *Air Quality*.

Regional Transportation Plan. On May 8, 2008, the Regional Council of the Southern California Association of Governments (SCAG) adopted the 2008 Regional Transportation Plan (RTP): Making the Connections. The 2008 RTP emphasizes the importance of system management, goods movement, and innovative transportation financing. It provides a regional investment framework to address the region's transportation and related challenges, and looks to strategies that preserve and enhance the existing transportation system and integrate land use into transportation planning.

The 2008 Regional Transportation Plan (RTP) incorporates the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The RTP presents the transportation vision for this region through the year 2035 and provides a long-term investment framework for addressing the region's transportation and related challenges. The RTP focuses on maintaining and improving the transportation system through a balanced approach that considers system preservation, system operation and management, improved coordination between land-use decisions and transportation investments, and strategic expansion of the system to accommodate future growth. The RTP consists of two sections: a financially constrained plan and a strategic plan.

Compass Blueprint Growth Vision Report. The 2004 Compass Blueprint Growth Vision is a response, supported by a regional consensus, to the land use and transportation challenges facing Southern California now and in the coming years. The Growth Vision is driven by four key principles: mobility, livability, prosperity, and sustainability.

To realize these principles on the ground, the Growth Vision encourages:

- *Focusing growth in existing and emerging centers and along major transportation corridors*
- *Creating significant areas of mixed-use development and walkable communities*
- *Targeting growth around existing and planned transit stations*
- *Preserving existing open space and stable residential areas*

City of Los Angeles Plans.

City of Los Angeles General Plan. California State law (Government Code Section 65300) requires that each City prepare and adopt a comprehensive, long-term general plan for its future development. This general plan must contain seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. California State law also requires that the day-to-day decisions of a City follow

² *South Coast Air Quality Management District, 2007 Air Quality Management Plan, website: <http://www.aqmd.gov/aqmp/07aqmp/index.html>, accessed October 2009.*



logically from and be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5 and 65647.4 require that zoning ordinances and subdivision and parcel map approvals be consistent with the general plan.

Consistent with State law, the City of Los Angeles General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City of Los Angeles. The General Plan consists of eleven elements, which include citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, also known as the Community Plan for each of the City's 35 Community Planning Areas. The General Plan Framework Element, adopted August 8, 2001, is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan Framework Element responds to State and federal mandates to plan for the future.

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The General Plan Framework Element also contains policies that are intended to maintain the City of Los Angeles's cultural and natural diversity. The General Plan Framework Element provides guidelines for future updates of the City's community plans. It does not supersede the more detailed community and specific plans.

Central City North Community Plan. The project site is located within the Central City North Community Plan area. Central City North Community Plan is one of 35 community plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the 35 community plans make up the Land Use Element of the General Plan.

The Central City North Community Plan was adopted in December 2000 and encompasses approximately 2,005 acres in the northern and eastern part of downtown Los Angeles. The jurisdictional boundaries of this planning area are from Alameda Street on the west to the Los Angeles River on the east, and from Broadway and Stadium Way on the north, to the City of Vernon boundary on the south. The Central City North Community Plan area contains large industrial and commercial operations within its boundaries, in addition to scattered residential land uses. Goals of the Central City North Community Plan include the following:

- *A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.*
- *A strong and competitive commercial sector which best serves the needs of the community through maximum efficiency and accessibility while preserving the historic commercial and cultural character of the district.*
- *Develop a public transit system that improves mobility with convenient alternatives to automobile travel.*
- *Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips.*



- *A system of safe, efficient and attractive bicycle and pedestrian routes.*
- *Community involvement in determining neighborhood traffic controls.*
- *A system of highways, freeways, and streets that provide a circulation system which supports existing, approved, and planned land uses while maintaining a desired level of service at all intersections.*
- *Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.*

Industrial Land Use Policy. The Department of City Planning and the Community Redevelopment Agency of the City of Los Angeles evaluated the viability of industrial uses in the industrially zoned areas of the City by preparing the Industrial Land Use Policy document. The main goals of the document are to provide guidance for processing land use entitlement applications, to identify where industrial uses and zoning should be retained and where it is unfeasible and should be considered for conversion to other uses. The Industrial Land Use Policy document also includes maps that identify sites as follows:

- ***Employment Protection District:*** *Areas where industrial zoning should be maintained (i.e., where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented). Residential uses in these districts are not appropriate.*
- ***Industrial Mixed Use District:*** *Areas that should remain as predominantly industrial/employment districts, but which may support a limited amount of residential uses.*
- ***Transition District:*** *Areas where the viability of Industrial use has been compromised by significant conversion and where this transition to other uses should be continued. Transition Districts have been identified in areas where “alternate policies” such as specific plans, Transit Oriented Districts (TODs), and other planning efforts are anticipated, or are in process.*

Los Angeles River Revitalization Master Plan. The Master Plan is a conceptual framework to guide revitalization of the Los Angeles River. The goals of the Master Plan are improving the ecosystem functions along the River as well as creating economic development opportunities for river-adjacent communities. The Master Plan consists of 239 projects over a 32 mile section of the Los Angeles River and includes: physical transformations to the river channel, open space development, plans for restoring a more natural system, and policy recommendations for revitalizing adjacent communities.

The goals of the Los Angeles River Revitalization Plan are to:

- *Establish environmentally sensitive urban design guidelines, land use guidelines, and development guidelines for the River zone that will create economic development opportunities to enhance and improve River-adjacent communities by providing open space, housing, retail spaces such as restaurants and cafes, educational facilities, and places for other public institutions.*



- *Improve the environment, enhance water quality, improve water resources, and improve the ecological functioning of the River.*
- *Provide public access to the River.*
- *Provide significant recreation space and open space, new trails, and improve natural habitats to support wildlife.*
- *Preserve and enhance the flood control features of the River.*
- *Foster a growth in community awareness of the Los Angeles River, and pride in the Los Angeles River.*

City of Los Angeles General Plan Designation. The Los Angeles General Plan designates the majority of the project site as Regional Commercial, while a portion of the northwest corner of the site is designated as Heavy Manufacturing.

City of Los Angeles Municipal Code. The Planning and Zoning Chapter of the Los Angeles Municipal Code (LAMC) regulates development through zoning designations and development standards. The site is located in two different zoning districts. The majority of the site is zoned C2, Commercial, while the portion of the northwestern corner of the site is zoned M3, Heavy Industrial. Zoning of the site and its surroundings is shown on Figure 3-2 in Section 3.0, *Environmental Setting*.

Permitted Land Uses. As detailed under the Planning and Zoning Code Section 12.14, the C2 (Commercial) zone allows a wide range of uses. Examples of permitted uses in the C2 zone include retail, office, restaurant, hospital, park, bank, school and residential development. High-intensity multi-family development is permitted in the C2 zone so long as the development complies with the use, area, density, open space, and related development regulations of the R-4 (multiple dwelling) zone. Pursuant to Section 12.14 of the LAMC, the lot area requirements of the R4 Zone (Section 12.11) apply to all portions of buildings in the C2 zone that are used for residential purposes. Specifically, the minimum lot width is 50 feet and the minimum area is 5,000 square feet (sf). However, as established in LAMC 12.22.A.18, for projects combining residential and commercial uses that meet LAMC 12.22.A.18, the lot area requirements of the R5 zone (and not those of the R4 zone) would apply.³ Thus, the lot area requirements applicable to the project site are a minimum width of 50 feet, a minimum area of 5,000 sf, and the minimum area of 200 sf per dwelling unit (LAMC 12.12.C.4).

As detailed under the Planning and Zoning Code Section 12.20, the M3 (Heavy Industrial) zone allows a wide range of uses. Examples of permitted uses in the M3 zone include various manufacturing and factory uses, storage, retail, office, restaurant, recreational, and bank. Residential development permitted in the M3 only with issuance of a Conditional Use Permit (CUP) or with other similar quasi-judicial approvals issued by the Zoning Administrator, the Area Planning Commission or the City Planning Commission, as consistent with the City's Industrial Land Use Policy.

Parking. Section 12.21 of the LAMC provides parking standards applicable to the project site. Pursuant to Section 12.21.A.4.(a), one parking space is required for each dwelling unit of less than 3 habitable rooms, 1.5 parking spaces for each dwelling unit of 3 habitable rooms, and 2 parking spaces for each dwelling unit of more than 3 habitable rooms.

³ Andrew Adelman, P.E., General Manager, City of Los Angeles Department of Building and Safety, City of Los Angeles Zoning Code Manual and Commentary, Fourth Edition, Page 146, May 2005.



In addition, LAMC Section 12.21 A.4.(x)(3) provides for an exception to the parking requirements identified in Section 12.21.A.4 for projects located within an Enterprise Zone. Specifically, this Section of the LAMC requires only 2 parking spaces for each 1,000 square feet of combined gross floor area of commercial office, business, retail, restaurant, bar and related uses, and trade schools (including professional and commercial schools). The Project site is also located in the Central City Parking District which allows by-right reductions in parking requirements for residential uses. Generally, the Los Angeles Zoning Code encourages reduced parking in transit rich areas and shared parking within mixed-use developments by providing specific processes for relief from citywide parking regulations under appropriate circumstances.

Landscape. Section 12.40 through 12.43 of the LAMC provides landscape standards applicable to the onsite development. The following regulations from Section 12.40-12.43 of the LAMC apply to onsite development:

- *No building permit, use of land permit, or grading permit for which landscape is required or for which landscape is provided shall be issued, except when the purpose is to construct a one-family dwelling, unless the Department of City Planning first determines that the required Water Management features and techniques, established by the City Planning Commission will be installed on the subject lot.*
- *All permanent irrigation systems required under the provisions of this Code that use potable water shall meet the minimum specifications for features and techniques established by the City Planning Commission*
- *At the discretion of the Department of City Planning, an irrigation system may be required when the applicant proposes to establish native plantings, designed to take advantage of natural rainfall*
- *No portion of this section shall be construed to mandate any specific type of irrigation equipment, either existing or to be developed, except backflow preventers, nor any specific method of application of water, either existing or to be developed, provided it meets the criteria set forth in this section, unless specifically required by other sections of this Code. The provision of hose bibs or quick coupler valves shall be considered the provision of an irrigation system, provided all points of the irrigated area are less than 50 feet from a hose bib or quick coupler valve; no portion of the irrigated area slopes at more than a 5:1 grade; and the total area to be irrigated does not exceed 500 square feet.*
- *All portions of every irrigation system shall be continuously maintained in a condition such that the intent of the irrigation design is fulfilled. Uncontrolled emission of water from any pipe, valve head, emitter, or other irrigation device shall be considered evidence of non-maintenance*
- *Owners of landscaping shall be encouraged to provide for plant mulching with planted areas provided with a layer of mulch a minimum of three inches deep, to aid the growth of the plants.*
- *Applications for landscape approval shall contain a proposal for shading of walls of structures in accordance with the guidelines established by the City Planning Commission*
- *Notwithstanding any other provisions of this Code to the contrary, applications for landscape approval shall contain a proposal for heat and glare reduction in vehicular*



use areas in accordance with guidelines established by the City Planning Commission

- *Applications for landscape approval shall contain a proposal for air quality enhancement, in accordance with the guidelines established by the City Planning Commission.*
- *The Department of Building and Safety shall not issue any building permits for a Project where soil and watershed conservation techniques, as provided in this section and in the guidelines established by the City Planning Commission, have not been used, as determined by the Department of City Planning.*
- *Non-native plants, when used, shall compliment native communities in growth habit, foliage color, cultural requirements, and flowering behavior*
- *All planting shall be coordinated with all signs and lighting on the project site, both upon installation of the planting and upon the planting reaching its maximum designed size. All shall be designed such that one will not interfere with the other, nor require excessive maintenance*
- *If any landscape includes grass, all grass clippings shall be recycled on- or off-site, and shall not be introduced into the off-site waste stream*
- *If a lot is 7,500 square feet or greater, all vegetative waste, except that which is not appropriate to recycle, shall be recycled on- or off-site and shall not be introduced into the off-site waste stream.*

Los Angeles State Enterprise Zone. The project site is located within the East Los Angeles Enterprise Zone, Los Angeles City Section. Within this area, businesses can take advantage of incentives such as hiring credits, state and/or federal tax credits and expense and interest deductions not available to businesses elsewhere, thereby lower their operating costs. The goal of these incentives is to stimulate business attraction, growth, and increased employment opportunities within economically challenged areas of the City. In addition, the City of Los Angeles offers local incentives applicable within the Enterprise Zone, including a Department of Water and Power rate discount, fee waivers, sewer facility hookup payment plans, Work Opportunity Tax Credit, and reduced parking rates (City of Los Angeles, State Enterprise Zones, 2009).

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds. The evaluation of land use impacts addresses consistency of the project with adopted plans, policies and ordinances. The analysis of potential land use impacts considers consistency of the project with adopted plans and policies that regulate land use on the project site, as well as the compatibility of onsite uses with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the project site. *CEQA Guidelines* §15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. Evaluations are made as to whether a project is inconsistent with such plans. Projects are considered consistent with regulatory plans if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The intention of the evaluation of consistency with regulatory plans is to determine if non-compliance would result in a significant physical impact. This is particularly true if a land use plan were adopted to avoid a physical environmental impact, such as shading of sensitive uses,



protection of resources, or avoidance of physically disruptive uses that would be out of character with an established area.

In accordance with guidance provided in Appendix G of the *CEQA Guidelines*, the onsite development would have a potentially significant impact related to land use consistency if it would:

- *Physically divide an established community;*
- *Conflict with any applicable land use plan, policy, or regulation or an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or*
- *Conflict with any applicable habitat conservation plan or natural community conservation plan.*

The potential for onsite development to divide an established community and conflict with a habitat conservation plan/natural community plan was addressed and dismissed in the Initial Study (Appendix A). As such, further analysis of these issues is not warranted.

As set forth in the *City of Los Angeles CEQA Thresholds Guide*, the determination of significance levels of impacts related to land use consistency are determined on a case-by-case basis considering the following factors:

- *Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site;*
- *Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;*
- *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; or*
- *The number, degree, and type of secondary impacts on surrounding land uses that could result from implementation of the proposed project.*

The discussion below focuses on consistency of onsite development with land use designations and zoning designations that apply to the project site, and consistency with applicable land use plans, policies, and regulations.

b. Project Impacts and Mitigation Measures. Land use impacts related to potential conflicts with the General Plan and Zoning Ordinance are discussed below.

Impact LU-1 Onsite development involves a General Plan amendment, zone change and other necessary approvals to allow for development on the project site. With these approvals, development would be consistent with the land use designations and the zoning designations that apply to the project site. Therefore, impacts would be *less than significant*.



The Los Angeles General Plan designates the majority of the project site as Regional Commercial, while a portion of the northwest corner of the site is designated as Heavy Manufacturing. Similarly, the majority of the site is zoned C2, Commercial, while the portion of the northwestern corner of the site within the Heavy Manufacturing land use designation is zoned M3, Heavy Industrial. The mixed retail, office, community space, creative live/work units and residential development would be allowed under the current Regional Commercial General Plan land use designation and corresponding C2, Commercial zone. However, creative live/work units and residential development would not be allowed in the portion of the site that is currently designated as Heavy Manufacturing and zoned M3, Heavy Industrial. In addition, depending on the height of onsite buildings, a height district change may be required. Onsite buildings would be required to comply with Section 12.21.1 through 12.21.5 of the LAMC. A Height District 2D would be required as part of the zone change to allow the anticipated onsite development.

As discussed in Section 2.0, *Project Description*, onsite development involves a General Plan amendment, zone change and other necessary approvals to allow for the development of mixed retail, office, community space, creative live/work units and residential development. The General Plan Amendment and zone change would be for the portion of the site that carries the Heavy Manufacturing General Plan land use designation and M3, Heavy Industrial zoning. Upon completion of the General Plan Amendment and zone change (including height district change), the entire site would have a General Plan Land use designation of Commercial and would be zoned C2-2D, Commercial.

Because a General Plan amendment, zone change and other necessary approvals would be required, onsite development would not conflict with the City of Los Angeles General Plan or the Municipal Code. Therefore, impacts would be less than significant.

Mitigation Measures. None required assuming that the necessary General Plan amendment and zone change is adopted.

Impact LU-2 **Onsite development would be consistent with applicable land use plans, policies, and regulations, including SCAG’s Regional Comprehensive Plan and Guide, SCAG’s 2008 Regional Transportation Plan, the City of Los Angeles General Plan, Central City North Community Plan, and the Los Angeles River Revitalization Master Plan, provided that the mitigation measures contained in Section 4.1, *Aesthetics*; Section 4.2, *Air Quality*; Section 4.3, *Geology*; Section 4.5, *Hydrology and Water Quality*; Section 4.9, *Public Services and Utilities*; and Section 4.11, *Transportation and Circulation* are implemented. Therefore, impacts would be *significant but mitigable*.**

SCAG’s RCPG, SCAG’s 2008 Regional Transportation Plan (RTP), the City of Los Angeles General Plan (General Plan), the Central City North Community Plan (Community Plan), and the Los Angeles River Revitalization Master Plan (Master Plan) include policies and objectives related to the City’s land use, environmental, and public services assets, opportunities, challenges and goals. Table 4.7-1 discusses consistency with the RCPG. Table 4.7-2 discusses consistency of onsite development with SCAG’s RTP. Tables 4.7-3, 4.7-4, and 4.7-5 discuss



consistency with the objectives and recommendations most applicable to onsite development contained in the General Plan, the Community Plan, and the Los Angeles River Revitalization Master Plan.

Consistent with the scope and purpose of this EIR, the discussion primarily focuses on those RCPG, RTP, General Plan, Community Plan, and Master Plan objectives and recommendations that relate to avoiding or mitigating environmental impacts, and an assessment of whether any inconsistency with these standards creates a significant physical impact on the environment. The ultimate determination of whether onsite development is consistent with these guidance documents lies with the decision-making bodies (Planning Commission and/or City Council).

Inconsistency with guidance documents applicable to the project site could create a potentially significant impact. However, as demonstrated below, with implementation of mitigation measures found throughout this EIR, impacts would be less than significant with respect to consistency of onsite development with guidance documents.

Onsite development would be consistent with the goals, guidelines, policies and objectives of all applicable guidance documents with implementation of mitigation measures as discussed in Tables 4.7-1 through 4.7-5.

Mitigation Measures. Several of the above consistency discussions assume implementation of the mitigation measures included in the EIR. Mitigation measures are contained in sections 4.1, *Aesthetics*, 4.2, *Air Quality*, 4.3, *Geology*, 4.5, *Hydrology and Water Quality*, 4.7, *Noise*, 4.9, *Public Services and Utilities*; 4.11, *Transportation and Circulation*, and Section 4.7, *Noise*.

Significance After Mitigation. With the inclusion of the mitigation measures identified throughout the EIR, the project would be consistent with the all applicable guidance documents and impacts would be less than significant.



**Table 4.7-1
 Comparison of Project Characteristics to RCPG Policies**

Policy	Consistency Discussion
<i>Growth Forecast Policies</i>	
The population, housing and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	Consistent. Onsite development would be consistent with the population and housing forecast data provided by SCAG (see Item XII, <i>Population and Housing</i> , in the Initial Study that was prepared for onsite development).
The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.	Not applicable. This policy is not applicable to onsite development, which is not a public facility, utility system or transportation project. However, it should be noted that onsite development would support patronage of the Los Angeles Metro Rail system and other regional transit systems by locating a development project within close proximity to the Little Tokyo station, Union Station and major bus routes.
<i>Policies to Improve the Regional Standard of Living</i>	
SCAG shall encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.	Consistent. Onsite development would be located in downtown Los Angeles. This development would be located in an area that currently contains infrastructure and would not require expansion of existing infrastructure. The project would locate mixed use development in an area where significant investment in transit infrastructure has been made. Therefore, onsite development would be consistent with this RCPG policy.
SCAG shall support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	Consistent. Onsite development would minimize the need for new infrastructure and public service delivery through its location within an urbanized area already served by utility, public service, and transportation systems. Therefore, onsite development would be consistent with this RCPG policy.
<i>Policies to Maintain the Regional Quality of Life</i>	
SCAG shall encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled and create opportunities for residents to walk and bike.	Consistent. The project site is located immediately adjacent to the Little Tokyo station and within walking distance of Union Station and major bus stops. As such, the onsite development would encourage the use of public transportation and reduce the need for roadway expansion, auto trips, and vehicle miles traveled. The project is an infill development on an underutilized site in the urban core. Therefore, onsite development would be consistent with this RCPG policy.
SCAG shall encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	Consistent. The project site is located in an existing urbanized area immediately adjacent to the Little Tokyo station and within walking distance of Union Station and major bus stops. Onsite development would rehabilitate this area by providing more urban uses in close proximity to existing urbanized areas. Therefore, onsite development would be consistent with this RCPG policy.



**Table 4.7-1
 Comparison of Project Characteristics to RCPG Policies**

Policy	Consistency Discussion
<p>SCAG shall support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers.</p>	<p>Consistent. Onsite development would be consistent with this RCPG policy because the development would increase density in walking distance of light rail, Union Station and major bus stops. Therefore, the onsite development would increase the development density at a strategic point for public transportation and would be consistent with this RCPG policy.</p>
<p>SCAG shall support local jurisdictions' strategies to establish mixed-use clusters and other transit oriented developments around transit stations and along transit corridors.</p>	<p>Consistent. Onsite development would consist of mixed use development that would include retail, office, community space, creative live/work, and multi-family residential components. This development would be in close proximity to light rail, Union Station, and major bus lines. Therefore, Onsite development would contribute to the creation of a development proximate to a transit center and would be consistent with this RCPG policy.</p>
<p>SCAG shall encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.</p>	<p>Consistent. Onsite development would involve development of retail, office, community space, creative live/work, and multiple-family residential uses in close proximity to the Little Tokyo station, Union Station, major bus stops, within areas supported by existing infrastructure systems. Therefore, onsite development would be consistent with this RCPG policy.</p>
<p>SCAG shall encourage planned development in locations least likely to cause environmental impact.</p>	<p>Consistent. Onsite development would be located in an urbanized area with existing road and utility infrastructure. There are no biological resources on the project site. The project site is presently well served by public and private transportation infrastructure. Overall, the location of onsite development would minimize the potential for environmental impacts. Therefore, the onsite development would be consistent with this RCPG policy.</p>
<p>Vital resources such as wetlands, groundwater recharge areas, woodlands, production lands and land containing unique and endangered plants and animals should be protected.</p>	<p>Consistent. Because the project site is located within an urbanized area, onsite development would not affect the vital resources mentioned in this policy. As discussed in the Initial Study (Appendix A), there are no wetlands, woodlands, or land containing unique and/or endangered plants and animals on the project site. Therefore, the onsite development would be consistent with this RCPG Policy.</p>
<p>Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</p>	<p>Consistent. As discussed in Section 4.3, <i>Cultural Resources</i>, onsite development would not significantly affect any cultural or archaeological resources. As discussed in Section 4.3, <i>Cultural Resources</i>, in the unlikely event that archaeological resources are encountered during site preparation and grading, compliance with the City's standard resource protection measures is required, and would ensure the preservation and protection of any such resources. Therefore, onsite development would be consistent with this RCPG Policy.</p>



**Table 4.7-1
 Comparison of Project Characteristics to RCPG Policies**

Policy	Consistency Discussion
<p>SCAG shall discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood or seismic hazards.</p>	<p>Consistent. The project site is developed and level, and does not include steep slopes or high fire hazards. The project site is not located within an area subject to flooding hazards or seismic hazards which exceed those present throughout Southern California (see sections 4.6, <i>Hydrology/Water Quality</i>, and 4.4, <i>Geology/Soils</i>). As discussed in Section 4.4, <i>Geology/Soils</i>, onsite development would be required to conform to all seismic safety requirements of the City of Los Angeles Uniform Building Code to ensure seismic hazards are reduced to less-than significant levels. Therefore, with mitigation, onsite development would be consistent with this RCPG policy.</p>
<p>SCAG shall encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.</p>	<p>Consistent. Mitigation measures to address significant construction and operational noise impacts would be required, as presented in Section 4.8, <i>Noise</i>. The project site is located in an urbanized area that does not contain any biological or ecological resources. Furthermore, as stated above, onsite development would be required to conform to all seismic safety requirements of the City of Los Angeles Uniform Building Code to minimize exposure to seismic hazards. Therefore, onsite development would be consistent with this RCPG policy.</p>
<p>Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement and fire protection.</p>	<p>Consistent. Onsite development would promote the development of sustainable communities through compliance with Title 20 of the California Code of Regulations, which establishes water efficiency standards for all new plumbing fittings and fixtures, and also with Title 24 (the California Green Building Standards Code), which requires that indoor water use be cut by 20% (see Section 4.9, <i>Public Utilities</i>). With incorporation of mitigation, no significant impact to public services would occur (see Section 4.9, <i>Public Services</i>) and thus would not inhibit the ability of the City of Los Angeles to provide such services equitably to all of its citizens. Therefore, onsite development would be consistent with this RCPG policy.</p>



**Table 4.7-2
 Consistency with 2008 RTP Goals**

Goal	Consistency Discussion
Maximize mobility and accessibility for all people and goods in the region.	Consistent. The project site is located in an urban environment and is in close proximity to major highways, boulevards, bus, and rail stations. As such, onsite development would maximize mobility and accessibility to the project site.
Ensure travel safety and reliability for all people and goods in the region.	Consistent. Onsite development would be required to comply with City of Los Angeles Building and Safety requirements in addition to CBC and UBC building codes, which would ensure that people and goods would be transported safely to and from the project site.
Preserve and ensure a sustainable regional transportation system.	Consistent. The proximity of the project site to alternative transit modes would support the region's transportation investment and the sustainability of the regional transportation system.
Maximize the productivity of our transportation system.	Consistent. Onsite development would be served by a range of existing local and regional bus lines and rail lines. The proximity of the project site to transit systems would maximize the productivity of the transportation system and, as such, would be consistent with this goal.
Protect the environment, improve air quality and promote energy efficiency.	Consistent. Onsite development would be required to implement project design features to reduce air quality impacts (see Section 4.2, <i>Air Quality</i>).
Encourage land use and growth patterns that complement our transportation investments.	Consistent. Onsite development would intensify development within an area served by Union Station and other transit providers. Growth in potential ridership in proximity to these existing systems would support the public's transportation investments.



**Table 4.7-3
 Compass Blueprint Growth Vision Report Policy Consistency**

Principal	Consistency Discussion
<p>Principle 1: Improve mobility for all residents</p> <ul style="list-style-type: none"> • <i>Encourage transportation investments and land use decisions that are mutually supportive.</i> • <i>Locate new housing near existing jobs and new jobs near existing housing.</i> • <i>Encourage transit-oriented development.</i> • <i>Promote a variety of travel choices</i> 	<p>Consistent. Onsite development would intensify development adjacent to existing public transit lines, as well as a network of major streets and highways. The location of development in an area well served by a range of transportation modes would support transportation investments and promote a variety of travel choices for the site’s future occupants.</p>
<p>Principle 2: Foster livability in all communities</p> <ul style="list-style-type: none"> • <i>Promote infill development and redevelopment to revitalize existing communities.</i> • <i>Promote developments, which provide a mix of uses.</i> • <i>Promote “people scaled,” walkable communities. Support the preservation of stable, single-family neighborhoods.</i> 	<p>Consistent. Onsite development would provide retail, office, community space, creative live/work, and multi-family residential uses on a currently underutilized site, which would support revitalization of the community. In addition, onsite development would incorporate a mix of uses, which would promote “people scaled” communities.</p>
<p>Principle 3: Enable prosperity for all people</p> <ul style="list-style-type: none"> • <i>Ensure environmental justice regardless of race, ethnicity or income class.</i> • <i>Encourage civic engagement.</i> 	<p>Consistent. Although civic engagement is generally beyond the scope of an individual project, discrimination based on race, ethnicity or income class would be prohibited in access to retail, office, community space, creative live/work, and multiple-family residential uses. In addition, onsite development would enhance the pedestrian environment, and would contribute to the economic well-being of the City.</p>
<p>Principle 4: Promote sustainability for future generations</p> <ul style="list-style-type: none"> • <i>Focus development in urban centers and existing cities.</i> • <i>Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.</i> • <i>Utilize “green” development techniques.</i> 	<p>Consistent. The project site is located within an existing, high-density, urban area. The project would be required to comply with applicable regulations that would reduce waste and pollution.</p>



**Table 4.7-4
 Consistency with City of Los Angeles General Plan**

Objectives and Policies	Consistency Analysis
Land Use	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. Onsite development would accommodate retail, office, community space, creative live/work, and multiple-family residential uses. These diverse uses would contribute to the activity and variety of uses in the community, which would support existing and future residents, businesses, and visitors to the City.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	Consistent. Onsite development would accommodate a variety of uses within an existing, highly urbanized area currently served by Union Station, Little Tokyo/Arts District Metro Gold Line station and bus stops. This mixed use development would increase pedestrian activity and potentially reduce vehicle trips, miles traveled, and air pollution.
Objective 3.9: (Community Centers) Reinforce existing and encourage new Community Centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.	Consistent. The project site is located in a General Plan Framework Designated Community Center, which is intended to be a mixed-use area to which growth and new development should be directed. As such, the proposed project is consistent with this policy.
Objective 3.10: Reinforce existing and encourage the development of new Regional Centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	Consistent. The project site would accommodate retail, office, community space, creative live/work, and multi-family residential development in an existing urban environment. This broad range of uses on the project site would contribute to job opportunities, housing, and commercial development in an urban area, which would enhance the urban lifestyle.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	Consistent. The project site would accommodate a variety of land uses that would increase the general activity of the area. Incorporating housing, jobs, commercial, and office uses into the area would enhance pedestrian activity in the area.
Housing	
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.	Consistent. The project site would accommodate multiple family housing in an urban area. The provision of housing in this area would increase land available for residential use and would incrementally contribute to the City's housing supply to meet the twenty-year projection of housing needs.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher density development and surrounding lower density residential neighborhoods.	Consistent. Onsite development would accommodate multi-family units in close proximity to the Little Tokyo station, Union Station and bus stops. These multi-family units would be located in a commercial area. Given its location in the urban core, the Project site is not located near lower density residential areas.



**Table 4.7-4
 Consistency with City of Los Angeles General Plan**

Objectives and Policies	Consistency Analysis
Transportation	
Objective 3: Support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plans.	Consistent. The project site is located within an existing major economic activity area of downtown. Onsite development would increase the activity in this area.
Objective 4: Preserve the existing character of lower density residential areas and maintain pedestrian-oriented environments where appropriate.	Consistent. Onsite development would include multi-family residential units. The project site is located within an existing commercial area in the urban core of the City. As the project site is not located within a low-density residential neighborhood and, as previously discussed, would enhance the pedestrian character of the area, onsite development would be consistent with this General Plan Framework objective. The proposed project further helps protect lower density areas of the city by providing increasing the City's housing stock by intensifying an underused infill site in downtown.



**Table 4.7-5
 Central City North Community Plan Policy Consistency**

Community Plan Goal, Objective or Policy	Consistency Discussion
<p>Goal I</p> <p>A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.</p>	<p>Consistent. Onsite development would include multi-family residences in an urban area of the City. Onsite development would be required to adhere to all requirements and standards set forth by the applicable zoning designations.</p>
<p>Objective 1-1</p> <p>To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.</p>	<p>Consistent. Onsite development would include multi-family residential uses that would meet the housing needs of existing residents and residents projected by the Central City North Plan.</p>
<p>Objective 1-2</p> <p>To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.</p>	<p>Consistent. Onsite development would include multi-family residential uses in an urban area that is served by Union Station, Little Tokyo/Arts District Metro Gold Line station and several bus stops. Because the residential units would be close to commercial and office uses, Onsite development would result in reduced vehicular trips. In addition, the surrounding urban environment would make the project site accessible to services and facilities in the City and would bring more services to this part of downtown.</p>
<p>Policy 1-2.1</p> <p>Encourage multiple residential development in commercial zones.</p>	<p>Consistent. Onsite development would include multi-family residences in an existing urban area and is an intensification of currently underused, predominantly commercial land.</p>
<p>Objective 1-3</p> <p>To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.</p>	<p>Consistent. Onsite development would include multi-family residential uses on the project site, which is surrounded by commercial, institutional, and multi-family residential uses. Onsite development would be compatible with the scale and character of residential development in the area and would not conflict with the character or integrity of existing residential neighborhoods.</p>
<p>Objective 2-1</p> <p>To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.</p>	<p>Consistent. Onsite development would include commercial uses, which would strengthen and enhance the commercial component of the community.</p>
<p>Policy 2-1.1</p> <p>New commercial uses shall be located in existing established commercial areas or existing shopping centers.</p>	<p>Consistent. Onsite development would include commercial uses in an area that contains commercial uses.</p>
<p>Policy 2-1.2</p> <p>Protect commercially planned/zoned areas from encroachment by residential only development.</p>	<p>Consistent. Onsite development would include residential and commercial uses. Therefore, the project site would not contain residential only development.</p>



**Table 4.7-5
 Central City North Community Plan Policy Consistency**

Community Plan Goal, Objective or Policy	Consistency Discussion
<p>Policy 2-2.1 Existing pedestrian oriented areas are to be preserved.</p>	<p>Consistent. Onsite development would include retail, office, community space, creative live/work, and multi-family residential uses in an area that is pedestrian oriented. Onsite development would add activity to the area and would enhance the pedestrian experience. Therefore, onsite development would be consistent with this policy.</p>
<p>Objective 2-3 To enhance the identity of distinctive commercial districts and to identify pedestrian oriented districts.</p>	<p>Consistent. Onsite development would include mixed uses in an area that contains commercial and residential development. Onsite development would be served by the Little Tokyo/Arts District Metro Gold Line station, Union Station and several bus stops would ensure that the area would become more distinctive and would remain pedestrian oriented.</p>
<p>Goal 12 Encourage alternative modes of transportation to the use of single occupant vehicles in order to reduce vehicular trips.</p>	<p>Consistent. The project site is located in close proximity to several bus stops as well as Union Station and the Little Tokyo/Arts District Metro Gold Line station. Therefore, the onsite development would contribute to the use of bus and rail services throughout the City. Moreover, the onsite development would accommodate a mix of residential, office, and commercial uses, which would encourage pedestrian activity as opposed to single occupant vehicles.</p>
<p>Policy 12-1.1 Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e. carpools, vanpools, buses, flex time, bicycles, and walking, etc.)</p>	<p>Consistent. Onsite development would include a mix of residential, office, and commercial uses in an urban area of the City. Incorporating a mix of uses on the project site would encourage use of alternatives to the automobile, including bus and rail services. Because the project site is in an urban environment and in close proximity to residential, office, and commercial uses, residents would be more likely to bike as well. Transportation mitigations found in <i>Section 4.11 Transportation and Circulation</i> will also facilitate and encourage use of alternative modes of transit.</p>

**Table 4.7-6
 Los Angeles River Revitalization Master Plan Policy Consistency**

Master Plan Goal, Objective or Policy	Consistency Discussion
<p>Objective 1-1 To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.</p>	<p>Consistent. Onsite development would include multi-family residential uses that would meet the housing needs of existing residents and residents projected by the Central City North Plan.</p>
<p>Objective 1-2 To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.</p>	<p>Consistent. Onsite development would include multi-family residential uses in an urban area that is served by the Little Tokyo station, Union Station and several bus stops. Because the residential units would be close to commercial and office uses, onsite development would reduce the need for automobile use. In addition, the surrounding urban environment would make the project site accessible to services and facilities in the City.</p>



c. Cumulative Impacts. Onsite development, combined with other planned and pending projects in and near the project vicinity, would contribute toward creating a more intense urban environment in the City. If all of the development indicated in Table 3-2 (Section 3.0, *Environmental Setting*) were to proceed, individual construction projects located throughout the City and the surrounding area would add approximately 2.7 million square feet (sf) of commercial/retail, 1.8 million sf of office, 20,000 residential dwelling units, 400,000 sf of restaurant, 2,000 hotel rooms, and 200,000 sf (900 students) of institutional development.

Planned and pending development, including onsite development, would contribute to a somewhat more intense urban environment throughout the City of Los Angeles and adjacent communities. However, it is anticipated that all development would comply with applicable provisions of the City of Los Angeles General Plan and other governing land use policies. As such, cumulative impacts relating to inconsistencies with applicable environmental policies are not anticipated. Regardless, onsite development would be consistent with applicable provisions of the City of Los Angeles General Plan and other policy documents and, therefore, would not contribute to any cumulative impacts relating to land use and planning.



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