
III. SCEA CRITERIA AND TRANSIT PRIORITY PROJECT CONSISTENCY ANALYSIS

A. SENATE BILL 375

The State of California adopted SB 375, The Sustainable Communities and Climate Protection Act of 2008, which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate a “sustainable communities strategy” into the regional transportation plans to achieve their respective region’s greenhouse gas emission reduction targets set by California Air Resources Board (ARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the Project Site.

On April 7, 2016, SCAG’s Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). For the SCAG region, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040. The 2016–2040 RTP/SCS would result in an estimated 8 percent decrease in per capita GHG emissions by 2020, 18 percent decrease in per capita GHG emissions from passenger vehicles by 2035, and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. By meeting and exceeding the then applicable SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state’s GHG emission reduction goals. The 2016 RTP/SCS outlines strategies to meet or exceed the targets set by ARB.¹

B. TRANSIT PRIORITY PROJECT CRITERIA

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (see Public Resources Code, Section §21155 (a) and (b)):

¹ *Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 19, 2012.*

1. Be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the ARB has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established by ARB;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provide a minimum net density of at least 20 units per acre; and
4. Be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

As discussed below, the Proposed Project qualifies as a TPP pursuant to the criteria set by Public Resources Code, Section §21155 and outlined above.

Consistency with Criterion #1

On April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. On June 28, 2016, ARB accepted SCAG's quantification of GHG emission reductions from the 2016–2040 RTP/SCS and determined that the 2016–2040 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by ARB.²

Use Designation, Density, and Building Intensity

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban; compact; or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016-2040 RTP/SCS, pp. 20-21.) The SCAG 2016-2040 RTP/SCS, Sustainable Communities Strategy Background Documentation, Appendix (April 2016), forecasted LDCs by county and subregion for 2012 and 2040. Exhibit 13: Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion, and Exhibit 14: Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion are provided in Appendix M of this SCEA. SCAG notes that the LDCs utilized in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016 RTP/SCS. The forecasted land use development patterns by LDCs

² *ARB Executive Order No. 16-066*

shown on the aforementioned exhibits are based on Transportation Analysis Zone (“TAZ”) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts were not adopted as part of the 2016 RTP/SCS. However, these data may be used at the discretion of local agencies, which maintain their existing authority over local planning and land use decisions and will be solely responsible for determining consistency of any future project with the 2016 RTP/SCS.

The Project Site area is located within an Urban Land Development Category, the highest density and most intense land development category assessed in the 2016-2040 RTP/SCS.

The 2016-2040 RTP/SCS describes the Urban Land Development Category as:

These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle. (page 20)

The Proposed Project would be consistent with the Urban Land Use Development Category. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, near Downtown Los Angeles. The Proposed Project is an infill project that would provide mixed-use development with multi-family units, together with project- and neighborhood-serving retail and restaurant uses. The Proposed Project is well-served by bus and rail lines and is located within a High Quality Transit Area as defined by SCAG and a Transit Priority Area as defined by SB 743, which supports transit opportunities and promotes a walkable environment. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid pattern as is most of the City of Los Angeles. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

The 2016-2040 RTP/SCS further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Proposed Project is a mixed-use project, which includes a 60-story mixed-use residential and commercial building with 700 residential dwelling units and 15,000 square feet of ground floor commercial space (7,000 square feet of retail and 8,000 square feet of restaurant space). The Proposed Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way and retail spaces. The Proposed Project would provide parking that is consistent with LAMC standards. Therefore, the Proposed Project is similar to other developments within HQTAs.

The RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, R&D, industrial, civic and open space. (SCAG 2016-2040 RTP/SCS Background Documentation, p. 90, ‘Place Types Categorized Into Land Development Categories (LDCs); SCAG 2016-2040 RTP/SCS,

Urban Footprint Place Types, pp. 1-2). The Proposed Project is consistent with a range of place types within the urban land development category.

“Urban Mixed-Use districts are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Parking is usually structured below or above ground. Workers, residents, and visitors are well-served by transit, and can walk or bicycle for many of their transportation needs.” The land use mix for this place type is typically approximately 18 percent residential, 16 percent employment, 45 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 15-100 feet, and the gross density ranges from 50- 500 employees per acre and 40-500+ households per acre. (SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, p. 1.)

‘Urban Residential’ place types “are typically found within or adjacent to major downtowns. They include high- and mid- rise residential towers, with some ground-floor retail space. Parking [is] usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.” The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net FAR is 9.0, floors range from 15-100, and the gross density ranges from 0-50 employees per acre 75-500+ households per acre. (SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, p. 1.)

The Proposed Project is a mixed-use development consisting of residential and retail/restaurant uses in a highly-urbanized part of Downtown Los Angeles, on a site that is currently occupied by a surface parking lot. Adjacent land uses include commercial/retail, offices, mixed-use multi-family residential buildings, and parking lots. The Proposed Project is approximately 98 percent residential, and approximately 2 percent non-residential with a non-residential FAR of 0.3 to 1. The Proposed Project area is supported by high levels of regional and local transit. The Proposed Project will construct approximately 603 dwelling units per acre and will have a total net FAR of 13 to 1.

Based on the regional growth projections in the 2016-2040 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). SCAG’s population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table III-1, below.

**Table III-1
SCAG Population and Housing Projections for the
City of Los Angeles, Los Angeles County, and the SCAG Region**

Population			
Region	2012	2040	% Growth (2012-2040)
Los Angeles City ^a	3,845,500	4,609,400	20%
Los Angeles County ^b	9,923,000	11,514,000	16%
SCAG Region ^b	18,322,000	22,138,000	21%
Households			
Region	2012	2040	% Growth (2012-2040)
Los Angeles City ^a	1,325,500	1,690,300	28%
Los Angeles County ^b	3,257,000	3,946,000	21%
SCAG Region ^b	5,885,000	7,412,000	26%
Employment			
Region	2012	2040	% Growth (2012-2040)
Los Angeles City ^a	1,696,400	2,169,100	28%
Los Angeles County ^b	4,246,000	5,226,000	23%
SCAG Region ^b	7,440,000	9,872,000	33%
<i>Source: SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.</i>			

The Proposed Project is an infill development project within the Central City Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. As shown in Table III-1, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City is Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Based on the community's current household demographics (e.g., an average of 1.68 persons per multi-family household for the Central City Community Plan area), the construction of 700 additional residential dwelling units would result in an increase in approximately 1,176 net permanent residents in the City of Los Angeles.³ Further, the Proposed Project includes a total of 15,000 square feet of ground-floor

³ *The 2015 Growth & Infrastructure Report estimates that the Central City Community Plan area had approximately 30,440 housing units and approximately 51,025 persons in July 1, 2015. Based on this information,*

commercial space. The Proposed Project would generate approximately 72 employees.⁴ The proposed increase in housing units, population, and employment would be consistent with SCAG’s forecast of 364,800 additional households, approximately 763,900 persons, and 472,700 jobs in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment.

Applicable Policies Specified for the Project Area

As set forth above, the Proposed Project is consistent with SCAG’s growth projections for the City of Los Angeles, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer to Section IV, Sustainable Communities Environmental Assessment, 10. Population and Housing, for a more detailed discussion of the Proposed Project’s consistency with SCAG’s population and housing growth.

The Proposed Project would be consistent with applicable goals and policies presented within SCAG’s 2016-2040 RTP/SCS. Refer to Table III-2 below for the Proposed Project’s consistency analysis.

**Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Goal 1 Align the plan investments and policies with improving regional economic development and competitiveness.	Not Applicable. This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
2016-2040 RTP/SCS Goal 2 Maximize mobility and accessibility for all people and goods in the region.	Consistent. The Project Site is located in a highly urbanized area with the City of Los Angeles within a High Quality Transit Area (as defined by SCAG). The Proposed Project would develop 700 dwelling units and 15,000 square feet of retail/restaurant space within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located less than one-half mile from two Metro Stations, the 7 th Street/Metro Center Station and the Pico Station. The Project Site is also served by number bus lines operated by the Metro, LADOT DASH, Commuter Express, Foothill Transit, Orange County Transportation Authority, Santa Monica Big Blue Bus, Gardena Municipal Bus Lines, and Montebello Bus Lines. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.

the Central City Community Plan area has an average person per housing unit ratio of 1.68. See City of Los Angeles, Department of City Planning, 2015 Growth and Infrastructure Report, 2016 (at p. 9 and 11).

⁴ *One employee would occupy approximately 588 square feet of retail space and one employee per 143 square feet of restaurant space. Source: United States Green Building Council, Building Area Per Employee by Business Type, May 13, 2008.*

**Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Goal 3 Ensure travel safety and reliability for all people and goods in the region.</p>	<p>Consistent. The Proposed Project would improve the public sidewalks adjacent to Project Site with landscaping and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 290 bicycle spaces to promote travel by bicycle. Furthermore, the Proposed Project would comply with LAMC and LADOT standards for Project Site access. The Proposed Project would be subject to the site plan review requirements of the City of Los Angeles, and the Department of Building and Safety and the Los Angeles Fire Department review would ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways. As such, the Proposed Project would support this goal.</p>
<p>2016-2040 RTP/SCS Goal 4 Preserve and ensure a sustainable regional transportation system.</p>	<p>Not Applicable. This goal is directed towards SCAG and does not apply to the Proposed Project. The 2016-2040 RTP states, “A transportation system is sustainable if it maintains its overall performance over time in an equitable manner with minimum damage to the environment, and at the same time does not compromise the ability of future generations to address their transportation needs. Sustainability, therefore, pertains to how our decisions today impact future generations. One of the measures used to evaluate system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system performance at current conditions. The 2016 RTP/SCS includes two additional new measures to support this outcome: State Highway System pavement condition and local roads pavement condition.”⁵</p> <p>As discussed in the Proposed Project’s Traffic Study (located in Appendix H), the Proposed Project would not create a significant impact at any of the study intersections, with the exception of one intersection, Olympic Boulevard and Hill Street. However, the Traffic Study concluded that impacts to this intersection would be mitigated to a less than significant impact with the implementation of mitigation measures, such as a TDM program. Additionally, as discussed in the Traffic Study, the Proposed Project would not create a significant impact at any CMP monitoring location (including arterials and freeways) and public transit. As such, the Proposed Project would not conflict with the regional transportation system.</p> <p>The Project would minimize impacts on the existing roadway system by placing housing near jobs and transit and providing ample bicycle parking and bicycle and pedestrian infrastructure to disincentivize automobile use and encourage biking and walking. The Project also</p>

⁵ SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).

Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	encourages transit use through the Project Sites' location near existing transit, thereby contributing to ridership and sustainability of the multimodal transportation system in the region.
2016-2040 RTP/SCS Goal 5 Maximize the productivity of our transportation system.	Consistent. The Proposed Project includes 700 residential units and 15,000 square feet of commercial uses. Given the Proposed Project's location close to transit, the Proposed Project will encourage the utilization of transit as a mode of transportation to and from the Project area. Thus, the Proposed Project will contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. Moreover, as discussed in the Proposed Project's Traffic Study (located in Appendix H), with the implementation of mitigation measures, the Proposed Project would not create a significant impact at any of the study intersections. Additionally, as discussed in the Traffic Study, the Proposed Project would not create a significant impact at any CMP monitoring location.
2016-2040 RTP/SCS Goal 6 Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	Consistent. As discussed in Section III, Air Quality, of the IS/MND, the Proposed Project would result in a less than significant impact regarding air quality during construction and operation. The Proposed Project would place dwelling units and ground-floor commercial space in a Transit Priority Area. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Project will provide 290 bicycle spaces to promote travel by bicycle. Thus, the Proposed Project would reduce vehicles-per-miles traveled and help improve air quality. The Proposed Project supports active transportation.
2016-2040 RTP/SCS Goal 7 Actively encourage and create incentives for energy efficiency, where possible.	Consistent. The Proposed Project would comply with the City of Los Angeles Green Building Code, the California Green Building Code.
2016-2040 RTP/SCS Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent. As stated above, the Project Site is located in a highly urbanized area near downtown Los Angeles within a HQTAs (as defined by SCAG) and a transit priority area (as defined by SB 743). The Project Site is located less than one-half mile from two Metro stations and numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units and commercial uses near mass transit and in close proximity to services, retail stores, and employment opportunities. The location of the Proposed Project encourages a variety of transportation

Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
	options and access and is therefore consistent with this Goal.
2016-2040 RTP/SCS Goal 9 Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Not Applicable. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.
2016-2040 RTP/SCS Guiding Policy 1 Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	Not Applicable. This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects and no further analysis is required.
2016-2040 RTP/SCS Guiding Policy 2 Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	Not Applicable. This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Proposed Project would contribute to a safe, well maintained, and efficient multimodal transportation system. The Proposed Project would provide landscaping along the public right-of-way and active ground floor uses, which promotes and supports pedestrian activity in the area. As discussed in the Proposed Project's Traffic Study (located in Appendix H), the Proposed Project would not create a significant impact at any CMP monitoring location.
2016-2040 RTP/SCS Guiding Policy 3 RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	Not Applicable. This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project. The Proposed Project would develop 700 dwelling units and 15,000 square feet of commercial area within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project would be consistent with the SCAG's goals of increasing mixed commercial/residential uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per-miles traveled.
2016-2040 RTP/SCS Guiding Policy 4 Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	Not Applicable. This policy is directed towards transportation investment by SCAG. However, the Proposed Project would support active transportation (e.g. walking and bicycling) by providing a mixed-use development with pedestrian and bicycle facilities on site, and landscaping along the public rights of way and active ground floor uses, which promotes and supports pedestrian activity in the area. Additionally, the Proposed Project's location within a High Quality Transportation Area promotes the use of public transit and pedestrian activity.
2016-2040 RTP/SCS Guiding Policy 5 HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	Not Applicable. This policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Although this policy is not applicable to the Proposed Project, the Proposed Project's location in a High Quality Transportation Area promotes the use of public transit and pedestrian activity.

Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Guiding Policy 6 The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.</p>	<p>Not Applicable. This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Proposed Project is located within a HQTAs (as defined by SCAG) and a transit priority area (as defined by SB 743). The Proposed Project would support public transportation and other alternative methods of transportation (e.g., walking and biking).</p>
<p>2016-2040 RTP/SCS Guiding Policy 7 The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.</p>	<p>Not Applicable. This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments.</p>
<p>2016-2040 RTP/SCS Guiding Policy 8 Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.</p>	<p>Not Applicable. This policy is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.</p>
<p>2016-2040 RTP/SCS Land Use Policy 1 Identify regional strategic areas for infill and investment.</p>	<p>Not Applicable. This policy is directed towards SCAG to identify regional strategic areas. The Proposed Project is an infill development in a High Quality Transit Area (defined by SCAG) and within a transit priority area (as defined by SB 743). The Proposed Project would be providing dwelling units and commercial uses in a highly urbanized area within the City of Los Angeles.</p>
<p>2016-2040 RTP/SCS Land Use Policy 2 Structure the plan on a three-tiered system of centers development.⁶</p>	<p>Not Applicable. This Land Use Policy is directed towards SCAG and not does apply to the Proposed Project. Nevertheless, the Project is located in an existing center where existing transportation infrastructure exists to support the proposed density of the Proposed Project.</p>
<p>2016-2040 RTP/SCS Land Use Policy 3 Develop “Complete Communities.”</p>	<p>Consistent. SCAG describes the development of “complete communities” to provide areas that encourages households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.⁷</p> <p>As stated above, the Proposed Project would place dwelling units and ground-floor commercial space in a transit-rich</p>

⁶ The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is “Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment.” A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

⁷ SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

**Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

Goals and Policies	Consistency Assessment
	area. The Project Site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project would be consistent with the SCAG's goals of increasing mixed commercial/residential uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per-miles traveled.
2016-2040 RTP/SCS Land Use Policy 4 Develop nodes on a corridor.	Not Applicable. The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. The Proposed Project is located within a HQTA and a transit priority area. The Proposed Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities. Additionally, on-site commercial uses would provide employment and patronage opportunities for residents on the Project Site and in the Project Site area.
2016-2040 RTP/SCS Land Use Policy 5 Plan for additional housing and jobs near transit.	Consistent. As discussed within this table, the Proposed Project includes a mixed-use development which would place housing and jobs (including retail and restaurant opportunities) on the same Project Site and in close proximity to an existing residential neighborhood. Additionally, the Proposed Project would support pedestrian and bicycle mobility and promote a variety of public transportation options to allow future residents to live and work within the community. The Proposed Project would place dwelling units and ground-floor commercial space in a HQTA and a transit priority area. The Project Site is located less than one-half mile from the intersection of two Metro Stations, the Pico Station and the 7 th Street/Metro Center Station. Additionally, the Metro Expo Line railway immediately borders the Project Site to the west, which would promote the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.
2016-2040 RTP/SCS Land Use Policy 6 Plan for changing demand in types of housing.	Consistent. The Proposed Project would provide 700 multi-family units within a mixed-use development within the City of Los Angeles. The multi-family units will meet the changing demand for units within walking distance of employment and patronage opportunities and transit options. The Proposed Project's units would be contributing to a range of housing choices and would be available to all persons, including existing employees and residents on the Project Site and in the Project area.
2016-2040 RTP/SCS Land Use Policy 7 Continue to protect stable, existing single-family areas.	Consistent. The Proposed Project would not demolish any existing single-family homes. Additionally, the Project Site is not located near any low-density residential neighborhoods.

**Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.</p>	<p>Consistent. The Proposed Project would provide 86,976 square feet of open space that exceeds the required amount pursuant to the LAMC. The open space amenities would include, but not limited to, a ground-floor lobby area, 5th level landscaped deck and amenity area, and private balconies. The Proposed Project’s on-site open space would reduce the Project’s demand upon public recreational facilities. Proposed Project’s open space would encourage open space necessary to support residential neighborhoods. Additionally, the Project Site is occupied with a surface parking lot, and the Proposed Project would not encroach on any existing natural habitat.</p>
<p>2016-2040 RTP/SCS Land Use Policy 9 Incorporate local input and feedback on future growth.</p>	<p>Not Applicable. This Land Use Policy is directed towards SCAG and not does apply to the Proposed Project.</p>
<p>2016-2040 RTP/SCS Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvements, and efficient transportation infrastructure.</p>	<p>Consistent. The Proposed Project includes the development of a mixed-used project consisting of multi-family residential units and commercial space (consisting of restaurant and retail uses). The Proposed Project incorporates aspects of a compact development by providing the proposed development on a previously developed surface parking lot. The Proposed Project’s mixed-use nature would place residences in close proximity to employment and patronage opportunities. The commercial uses on-site would further support the pedestrian activity along Hill Street and Olympic Boulevard by providing ground-floor commercial uses that would front these major commercial corridors.</p> <p>Further, the Proposed Project includes a mix of studio, one-bedroom, two-bedroom, and penthouse units. These units would be provided at market rates at different price points. As such, the Proposed Project increase housing options to accommodate a range of households.</p> <p>(As discussed above, the Proposed Project would include pedestrian and bicycling improvements and commercial development that would support bicycle and pedestrian activity on the Project Site and in the Project Site area. The Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. As such, the Proposed Project would support bicycle and pedestrian improvements and promote efficient transportation.</p>
<p>2016 RTP/SCS Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.</p>	<p>Not Applicable. Benefit 2 is directed towards SCAG and not does apply to the Proposed Project. The Proposed Project is a mixed-use project, which would provide multi-family residential apartments and commercial uses. The Project Site’s location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.</p>

**Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

Goals and Policies	Consistency Assessment
<p>2016 RTP/SCS Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.</p>	<p>Consistent. The Proposed Project includes numerous energy-efficient design features, such as ENERGY STAR-rated appliances and electric vehicle supply equipment. It will comply with the City of Los Angeles Green Building Code and the California Green Building Code, which provide provisions for energy and water conservation. The Project’s incorporation of bicycle- and pedestrian-friendly elements and location near bus lines will provide future residents with various affordable transportation options.</p>
<p>2016 RTP/SCS Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.</p>	<p>Consistent. While this Benefit is directed toward SCAG goals to improve placemaking and strategic transportation investments, the Proposed Project would support the intent of this Benefit. The Proposed Project would redevelop an underutilized site that is currently developed with a surface parking lot and construct a mixed-use development that would include multi-family residential units and approximately 15,000 square feet of commercial space. The commercial area would consist of a mix of restaurant and retail uses.</p> <p>The Proposed Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. The on-site commercial uses would provide employment and patronage opportunities within walking distance of on-site residents and the nearby multi-family residential developments.</p> <p>In addition, the Project Site is located within ½ mile of two Metro stations and numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Thus, this would reduce vehicles-per-miles traveled, promote alternatives to driving, and aim to improve air quality.</p>
<p><i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.</i></p>	

Consistency with Criterion #2

The Proposed Project includes the construction of a total floor area of 657,943 square feet. The Proposed Project includes 700 dwelling units (which encompasses approximately 642,943 square feet of residential floor area), comprising approximately 98 percent of the total floor area. The Proposed Project includes 15,000 square feet of commercial space (7,000 square feet retail and 8,000 square feet of restaurant space), comprising 2 percent of the total floor area. Therefore, the Proposed Project contains at least 50 percent of residential uses. As such, the Proposed Project would be consistent with this Criterion.

Consistency with Criterion #3

The Project Site is approximately 1.16 acres before street easements and dedications. The Proposed Project includes 700 dwelling units; as such, the Proposed Project provides approximately 603 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

Consistency with Criterion #4

PRC Section 21155 (b) defines a “high-quality transit corridor” as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project Site is located less than one-half mile of two Metro Stations, the Pico Station and the 7th Street/Metro Center Station and is located less than one-half mile of an intersection served by numerous bus routes with peak commute service intervals of 15 minutes or less (See Page II-4, Public Transit). Moreover, the 2016-2040 RTP/SCS identifies the Project Site as being within a HQT. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this Criterion.

C. SB 375 STREAMLINING BENEFITS

Pursuant to Public Resources Code, Section §21155.2(a), if the Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC Section 21081, then the Proposed Project shall be eligible for either the provisions of subdivision (b) (sustainable communities’ environmental assessment) or (c) (limited analysis EIR). The Proposed Project would follow subdivision (b), and the Proposed Project would be reviewed through a sustainable communities’ environmental assessment (SCEA), which provides streamlining benefits.

PRC Section §21155.2(b) states that an initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable. As such streamlining benefits include:

1. Cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports shall not be treated as cumulatively considerable for the Proposed Project (PRC Section §21155.2(b)(1));
2. Growth-inducing impacts are not required to be referenced, described, or discussed (PRC Section §21159.28(a));
3. Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Proposed Project on global warming or the regional transportation network are not required to be referenced, described, or discussed (PRC Section §21159.28(a));
4. Reduced density alternatives are not required to be referenced, described, or discussed to address the effects of car and light-duty truck trips generated by the Proposed Project (Public Resources Code Section 21159.28(b)).

The City of Los Angeles, Department of City Planning would incorporate all applicable streamlining benefits in the environmental review of the Proposed Project.

D. SCOPE OF ANALYSIS

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those, which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, the SCEA would analyze the following topics:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance