

4.10 LAND USE AND PLANNING

This section addresses impacts related to the City's land uses and planning efforts. Topics include the potential to physically divide an established community, inconsistencies with applicable land use plans and policies, and inconsistencies with adopted habitat conservation plans. Key sources used to gather information on the City's zoning and land use policies included the City's Zone Information Map Access System (ZIMAS, <http://zimas.lacity.org/>; Los Angeles Department of City Planning [LADCP] 2017a), the City's General Plan (https://planning.lacity.org/GP_elements.html; LADCP various dates), and the Southern California Association of Governments (SCAG's) 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (<http://scagrtpscscs.net/Pages/FINAL2016RTPSCS.aspx>; SCAG 2016-2040 RTP/SCS).

ENVIRONMENTAL SETTING

EXISTING CONDITIONS

Citywide Existing Conditions

The City of Los Angeles encompasses roughly 478 square miles, including 5 square miles of water area and just under 472 square miles of land area consisting of 35 separate community planning areas. Land uses in the City are diverse and vary widely by community planning area. Residential land uses make up the largest use in terms of acreage and are located throughout the City. Commercial and office uses also occur throughout the City and are located primarily along arterial corridors, at nodes at principal intersections, and in larger scale nodes and centers. Increasingly, centers such as Downtown include a mix of residential, commercial, and office uses. Industrial uses also occur throughout the City, but have major clusters along rail lines and near air and water ports. Institutional uses are dispersed throughout the City, with concentrations in Downtown (the Civic Center) and near major educational facilities, such as UCLA, USC, CSUN, and CSULA. Open space and recreational uses include parks, golf courses, and beaches, as well as areas such as the Santa Monica and Verdugo mountains, Ballona wetlands, and facilities such as Dodger Stadium, Staples Center, and the Los Angeles Memorial Coliseum.

Downtown Plan Area Existing Conditions

The Downtown Plan Area is currently developed with a mix of commercial, residential, public facilities, open space, and light industrial uses, which reflects its role as the governmental, cultural, entertainment, financial, employment, and industrial hub of Los Angeles (LADCP 2003). The area is replete with spaces of citywide and regional importance, including public spaces, such as the Los Angeles Public Library Building, Union Station, Los Angeles City Hall, and Grand Park; arts and cultural institutions, such as the Museum of Contemporary Art (MOCA), the Walt Disney Concert Hall, Mark Taper Forum, Ahmanson Theatre, Dorothy Chandler Pavilion, Broad Museum, and Redcat Theater; large sports and entertainment venues, such as Staples Center and the Los Angeles Convention Center; and office centers, such as the Citigroup Center, Ernst & Young Plaza, Southern California Gas Company Complex, and Wilshire Grand Center. Surrounding communities include Silver Lake-Echo Park Elysian Valley to the north, Westlake to the west, South Los Angeles and Southeast Los Angeles to the south, Boyle Heights to the east, and Northeast Los Angeles to the northeast.

The Downtown Plan Area is accessed by a number of freeways and major arterials. Freeways serving Downtown include U.S. 101, and I-5, I-10, and I-110. Major east-west arterials include First Street, and Wilshire, Olympic, Pico, and Venice boulevards. Major north-south arterials include Figueroa Street and Grand, Main, Central, and Alameda avenues. Downtown is also the center of the region's growing rail transit system, with six commuter lines operated by Metrolink and five rapid-transit rail lines and local and regional bus service operated by Metro. Major Metro stations in the district include Los Angeles Union Station, Civic Center/Grand Park station, Pershing Square station, 7th Street/Metro Center station, Pico station, and Little Tokyo/Arts District station. The area circulation system is described in greater detail in Section 4.15, *Transportation/Traffic*.

The Downtown Plan Area encompasses the City's Historic Core and other iconic Los Angeles neighborhoods, including the Financial District, Bunker Hill, South Park, Chinatown, Skid Row, Fashion District, and Little Tokyo. Major Downtown neighborhoods are described below.

- **Financial District and Commercial Core.** The commercial core of Downtown is generally located in the central-west side of the Downtown Plan area, and contains both modern and historic office buildings, hotels, restaurant and retail destinations, and entertainment and nighttime attractions. These areas have the highest intensity of land uses, with the tallest buildings in the City. This portion of the Downtown Plan Area is well-served by transit, including regional and local bus lines, as well as Metro Rail stations connecting Downtown to the rest of the City of Los Angeles through the Red, Purple, Blue, Gold, and Expo lines.¹ Additional infrastructural improvements are planned for this area, such as streetscape and mobility improvements for 7th Street, the primary pedestrian corridor for this area, and the Downtown Streetcar route. Buildings are primarily mid- and high-rises and include many of the skyscrapers that define the Downtown Los Angeles skyline.
- **Bunker Hill and Cultural Corridor.** Bunker Hill and the cultural corridor along Grand are north of the Financial District. They serve as both a center for office activity and a cultural corridor, featuring institutional and cultural landmarks including the Broad Museum, Walt Disney Concert Hall, and Dorothy Chandler Pavilion, and the Colburn School. Integrated with these uses are mixed-use commercial and residential buildings, and a planned Metro station currently under construction at 2nd Street and Hope Street that is part of the Metro Regional Connector Project which is currently under construction.
- **Historic Core and Entertainment Center.** The Historic Core and entertainment center along Broadway are located in the heart of the Downtown Plan Area. This area has one of the largest collections of historic buildings not just in Downtown Los Angeles, but in the country. As a result, the built environment is generally consistent, with 12-story Beaux Arts and Art Deco buildings built out to the property lines and continuing active uses on the ground floor. While many of these structures were originally built to serve financial and commercial offices, much of the building stock has been adapted into residential apartments and condominiums.
- **South Park.** South Park is in the southwest portion of the Downtown Plan Area. It is a walkable, residential mixed-use neighborhood, supported by commercial, office, and medical uses, and served by a Metro transit station. A majority of the development in South Park occurred in the past decade, with structures commonly between six and twelve stories with active uses on the ground floor.
- **Convention Center Area and Los Angeles Sports and Entertainment District.** The Convention Center area sits in the southwestern portion of Plan area. It is the site of several of Los Angeles' foremost sports and entertainment venues, and is regulated by the Los Angeles Sports and Entertainment District Specific Plan (LASED). The district includes the Los Angeles Convention

¹ Starting as of late 2019, the Red Line is known as B Line, the Purple Line is known as the D Line, the Gold Line is known as the L Line, the Blue Line is known as the A Line, and the Expo line is known as the E Line.

Center, Staples Center, L.A. Live, Grammy Museum, and Microsoft Theater. It also includes hotel, commercial, office, entertainment, and residential uses.

- **Skid Row.** Skid Row is in the central portion of the Plan area, and is a residential neighborhood that has long served people in need. The community is home to family and social service organizations, permanent supportive housing, single room occupancy hotels, as well as homeless and unhoused community members. Structures in Skid Row range between one story and twelve stories in height.
- **Civic Center, El Pueblo, and Union Station.** The Civic Center is home to Federal, State, County, and local agencies and is the second largest concentration of governmental offices in the country. It contains civic and architectural landmarks, as well as one of Downtown's primary open spaces, Grand Park. El Pueblo de Los Angeles Historical Monument is a historical district that includes areas that once formed the original pueblo, or "town," from which Los Angeles later developed. El Pueblo encompasses approximately 44 acres surrounding the Los Angeles Plaza. It contains a number of historical buildings and features, including the Nuestra Señora La Reina de Los Angeles Church (1822), Avila Adobe (1818), the Olvera Street market, and Pico House (1870) (City of Los Angeles 2018). Los Angeles Union Station is in the northeastern portion of the Plan area, and east of Union Station is the Los Angeles River and to the west is the City's historic Olvera Street and El Pueblo de Los Angeles State Historic Park, as well as the Civic Center. Union Station is the City's principal transportation hub, home to local, regional, and national transit providers, and the planned site for the California High Speed Rail (HSR) Los Angeles station.
- **Arts District.** The Arts District is located in the eastern portion of the Downtown Plan Area. It is a mixed use environment consisting of production, manufacturing, and creative office uses, and is home to a growing residential population. Many of the existing low-scale warehouses and industrial buildings have been converted into live/work, commercial, and institutional uses. New mixed-use buildings with housing, commercial, light production, restaurants, retail establishments, and business incubation uses have been constructed and other similar projects have been proposed.
- **Chinatown and Victor Heights/Figueroa Terrace.** Chinatown is home to a long-standing variety of small and family-owned businesses, family associations, and institutional services that serve the Chinese-American population throughout the region, as well as other communities. The neighborhood also includes a number of historic cultural resources that are generally Asian eclectic in style. The historic center is characterized by walkable commercial corridors and internally oriented courtyard and mid-scale development. Building heights range from one-story single family homes and retail establishments to multi-family and mixed-use mid-rise buildings. Victor Heights, also known as Figueroa Terrace, is a multi-generational residential community with primarily multi-family housing such as townhomes, garden courts, and apartments that range from one to five stories and are interspersed with single family homes.
- **Little Tokyo.** Little Tokyo is a historic-cultural neighborhood and the symbolic center for the Los Angeles Japanese-American community. The neighborhood contains a variety of religious and cultural institutions as well as a mix of residential, commercial, and other institutional uses. Small-scale shops, restaurants, and storefronts with unique architectural features occupy buildings that range between one and twenty stories in height. Little Tokyo contains the Little Tokyo First Street National Historic Landmark, which is a historic Japanese commercial district originally settled in the late 19th century (National Park Service [NPS] 2018). The historic district is roughly bounded by 301-349 East First St., 110-120 Judge John Aiso Street, and 119 S Central Avenue.
- **Industrial, Manufacturing, and Wholesale Districts.** These districts are located in the southeast and south-central portion of the Downtown Plan Area and are characterized by large-format and medium to low-scale buildings with wholesale, warehousing and distribution uses. These districts also include a mix of additional uses, including social services, supportive housing, nonprofit, and

institutional organizations that serve as an anchor for employment in the City. Some sub-districts, such as the Flower Market and Fashion District, have high levels of pedestrian activity with fine-grained alleys and market halls that attract patrons from across the City and region.

- **Production.** The Production area is located in the southern most portion of the Downtown Plan Area with low-scale one to three story buildings that predominantly house industrial and manufacturing uses. The Production area serves as a jobs base for the region and offers employment in industries such as clean technology, heavy industrial, industrial manufacturing, and fabrication with very limited retail uses.

CURRENT GENERAL PLAN LAND USE DESIGNATIONS AND ZONING

Adopted in 1996, the City's General Plan Framework Element is a strategy for long-term growth and development, setting a citywide context for the update of the 35 Community Plans and other citywide general plan elements. While the General Plan Framework Element incorporates a diagram that depicts the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, the specific General Plan Land Use Designations are established and applied by the community plans.

The existing General Plan designations for the Downtown Plan Area are established in the Central City Community Plan (adopted in 2003) and the Central City North Community Plan (adopted in 2000). (**Figure 4.10-1** provides the existing General Plan Land Use Maps for the two Community Plan Areas.)

The following section summarizes the General Plan Framework Element designations throughout the City, categorized by broader land use categories of residential, commercial, industrial, open space, and public facilities land uses. This is followed by a description of current land uses for the Downtown Plan Area, as established in Central City and Central City North Community Plans.

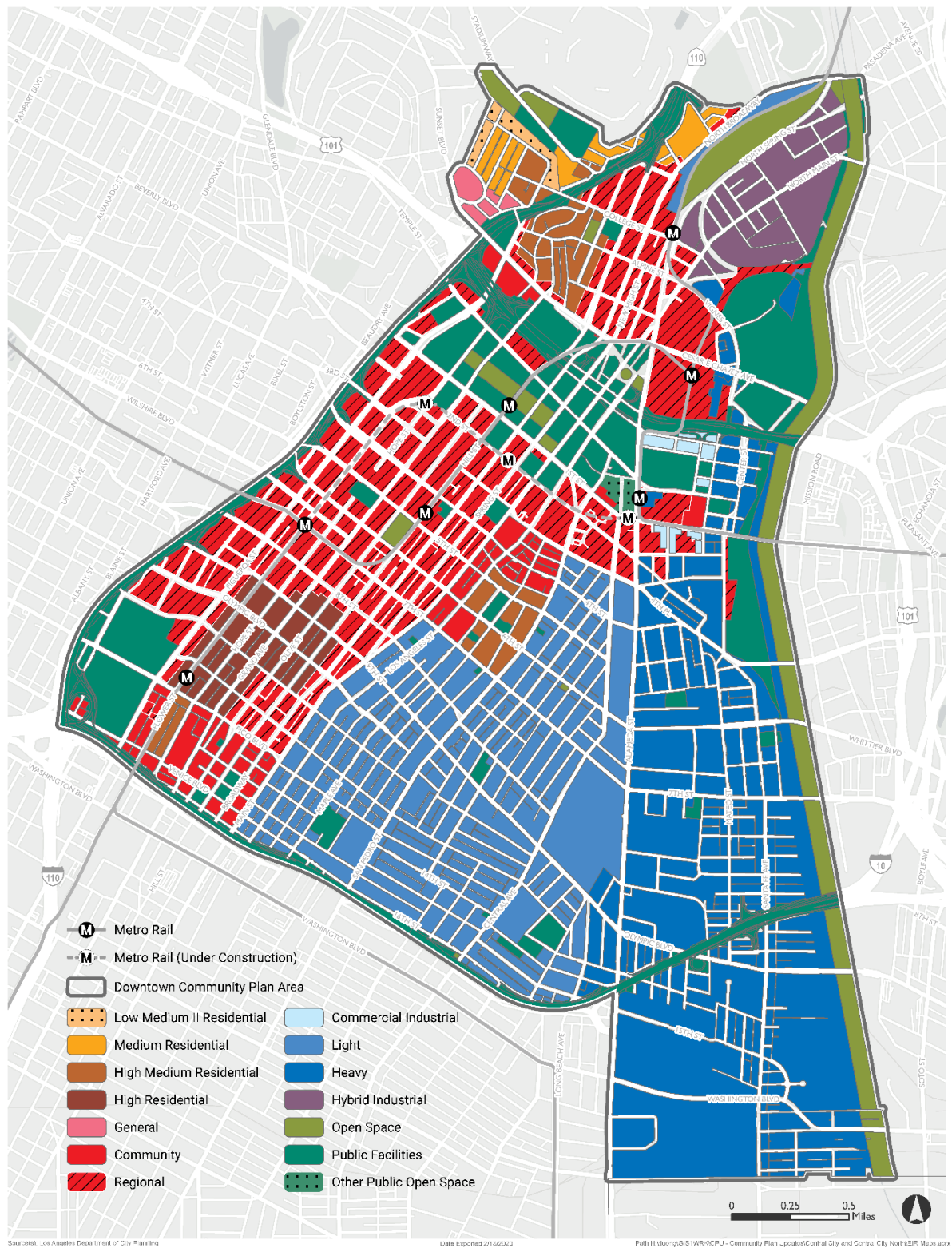
Residential

Citywide

Residential General Plan land use designations in the City consist of low-density and multi-family residential. Low-density residential ranges from one to nine dwelling units per acre (du/ac) using the categories Minimum, Very Low, Very Low I, Very Low II, and Low. Multi-family residential ranges from Low Medium I (10-17 du/ac), Low Medium II (18-29 du/ac), Medium (30-55 du/ac), High Medium (56-109 du/ac), and High (110-218 du/ac), although some community plans encourage greater densities. In addition, residential uses are permitted within Commercial land use designations.

Downtown Plan Area

All existing residential land use designations applied within the Downtown Plan area are multi-family, and include Low Medium II, Medium, High Medium, and High. These are applied primarily in South Park and in the northwest portion of Central City North. South Park is predominantly designated High Residential with R5 zoning, and Height District 3-D and 4-D, allowing for up to 6.0:1, and 13.0:1 FAR with no height limitations through a transfer of development rights process. Residential designations are also applied in Bunker Hill and Little Tokyo, where development can reach up to 6.0:1 FAR. The western portion of the Skid Row neighborhood is designated High Medium Residential with R5 zoning and Height District 2D and development can reach 3.0:1 FAR. Victor Heights and Figueroa Terrace are designated Low Medium II, Medium and High Medium Residential with a mix of RD1.5, R3 and R4 Residential zoning, and Height District 1, allowing for up to 45 feet in RD1.5 and R3 zones and no height limitations in the R4 zones.

Figure 4.10-1 Current Downtown Plan Area General Plan Designations

Commercial

Citywide

Commercial General Plan land use designations in the City consist of Regional, Community, Neighborhood, Highway Oriented, Limited, and General Commercial. Regional Commercial areas allow for the highest development potential and widest variety of uses, including corporate and professional offices, retail commercial, offices, and personal services, eating and drinking establishments, entertainment, major cultural facilities, commercial overnight accommodations, and mixed-use structures that integrate housing with commercial uses. Community, Neighborhood, Highway-Oriented, and General Commercial designations may restrict various uses and development potential is typically lower than the Regional designation. Limited Commercial is the most restrictive designation. All commercial areas allow multi-family residential development.

Downtown Plan Area

Within the Central City Community Plan Area, the Regional Commercial designation is applied to the western portion of the Plan Area, primarily south of 1st Street, north of Pico Boulevard and west of North Main Street. The area is predominantly zoned with C2 Commercial zoning, allowing for a mix of uses including commercial, office, retail, housing, hotel, schools, auto sales, and limited manufacturing uses. There is also C4 Commercial zoning, which allows for a variety of C2 uses such as commercial, office, retail, multi-unit residential, hotel, schools, and auto sales, with limitations. This area does not have density limitations, due to the Greater Downtown Housing Incentive Ordinance, which applies to the entirety of the Central City Community Plan area. The area is predominantly assigned Height District 3-D and 4-D and can reach up to 6.0:1 with no height limitations, and 13.0:1 FAR with no height limitations through a transfer of development rights process.

The Community Commercial designation is applied to the portion of the Plan Area south of Pico Boulevard and west of Main Street, and along the eastern side of the Historic Core and in the Toy District. Buildings are primarily low- and mid-rises and support smaller businesses, such as restaurants, used auto stores, medical or dental clinics, and nurseries.

Little Tokyo is predominantly designated Regional Center Commercial with C2 Commercial zoning and Height District 4D, allowing for up to 6.0:1 FAR with no height limitations. The area has Qualifying [Q] Conditions, which limit ground floor activity to neighborhood-serving uses. Little Tokyo is also regulated by the Little Tokyo Community Design Overlay District (CDO).

In the Central City North Community Plan Area, land designated for commercial is primarily concentrated in Chinatown, north and east of the intersection of Alameda Street and Cesar E. Chavez Avenue. The commercial core of Chinatown is designated Regional Center Commercial with C2 Commercial zoning, and Height District 2, allowing for up to 6.0:1 FAR with no height limitations.

Industrial

Citywide

Industrial General Plan land use designations in the City consist of Commercial Manufacturing, Hybrid, Limited, Light, and Heavy Industrial. Hybrid industrial areas allow for a mix of residential and clean, light industrial uses. Limited and Light Industrial designations are more restrictive to allow for greater compatibility with residential uses. Heavy industrial areas allow the widest range of industrial, machinery, and manufacturing uses, and do not permit any by-right residential uses.

Downtown Plan Area

Industrial land use designations are generally applied east of Main Street below Seventh Street, east of San Pedro Street from Seventh to Third Street, and east of Alameda Street from Third Street to the Hollywood Freeway. This consists of Light Manufacturing and Heavy Manufacturing in the Central City Plan Area. These areas are zoned for CM, MR2, M2, and M3, with Height Districts allowing for up to a 3.0:1 FAR, and up to a 6:1 through a transfer of floor area process west of San Pedro Street.

The northeast portion of the Central City North Community Plan area is designated Hybrid Industrial and regulated by the Cornfield Arroyo Seco Specific Plan (CASP). South of the 101 Hollywood Freeway, land is predominantly designated Heavy Manufacturing, with M3 Heavy Industrial zoning, which allows for the widest range of industrial uses including commercial, manufacturing uses, and storage. The area assigned Height District 1 allows for up to 1.5:1 FAR with no height limitations. The area is regulated by the River Improvement Overlay (RIO).

Open Space

Citywide

Open space land use designations in the City include park and recreation facilities (bicycle trails, equestrian trails, walking trails, park land/lawn areas, child care facilities, and athletic fields), natural resource preserves (forest land, waterways, watersheds, agricultural lands, areas containing mineral deposits), ecological preserves and habitat protection sites, closed sanitary landfills sites, public water supply reservoir (uncovered), and water conservation areas such as percolation basins and floodplain areas.

Downtown Plan Area

The Open Space land use designation is applied in various locations throughout the Downtown Plan Area and includes approximately 226 acres of land. Areas designated for Open Space include 6th & Gladys Park, Pershing Square, Grand Park, and the Los Angeles State Historic Park.

Public Facilities/Institutional

Citywide

Public Facilities/Institutional General Plan land use designations in the City include fire and police stations, public libraries, post offices and related facilities, public health facilities such as clinics and hospitals, public elementary and secondary schools, among others.

Downtown Plan Area

The Public facilities land use designation is applied primarily north and south of Temple Street to the Civic Center and El Pueblo areas. These areas are predominantly zoned PF, and permit uses including public libraries, schools, police and fire stations, freeways, and institutional uses. Much of the area is assigned a Height District 2-D, and development in the Civic Center can reach up to 6.0:1 through a transfer of floor area process and development in El Pueblo can reach up to 3.0:1 FAR with unlimited height. The Union Station area is regulated by the Alameda District Specific Plan, which encourages a pedestrian-oriented and mixed-use business district with hotels, retail, entertainment, housing, cultural, and transit-related functions in medium and high-density development.

REGULATORY FRAMEWORK

Federal, State, and Local land use and planning laws, Regulations, and adopted plans applicable to the Downtown Plan are summarized below.

FEDERAL

There are no federal land use regulations applicable to the Proposed Project.

STATE

State Planning Law

State planning law (California Government Code Section 65300) requires every city and county in California to adopt a comprehensive, long-term general plan for the physical development of the jurisdiction and of any land outside its boundaries that, in the planning agency's judgment, bears relation to its planning (sphere of influence). A general plan should consist of an integrated and internally consistent set of goals and policies grouped by topic into a set of elements and guided by a jurisdiction-wide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the community that the general plan should address, such as hazards or flooding.

State Density Bonus Law (Government Code Section 65915)

The State Density Bonus law (signed into law in 1979) requires jurisdictions to provide applicants with a density bonus and incentives or concessions for the production of housing development in which affordable housing is also provided. Eligible projects include housing developments with 10 percent housing for lower income households, 5 percent of the housing for very low income households, senior citizen housing, and 10 percent of the total dwelling units provided as affordable housing in condominium projects. The City has implemented the State Density Bonus Law in various municipal code sections of the LAMC.

On September 27, 2014, Governor Brown signed AB 2222, which amended sections of the State Density Bonus Law (Government Code Section 65915). AB 2222 requires that density bonus projects resulting in a loss of existing affordable and otherwise locally-regulated (i.e., rent-stabilized) housing units replace those units one-for-one. It also extends the affordability period from 30 to 55 years and expands the use of equity sharing in for-sale units. Several other clarifications of the existing law are also included, but they were not judged to represent a change to current City policy.

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375 (SB 375))

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the state's climate action goals to reduce greenhouse gas (GHG) emissions through coordinated transportation and land use planning with the goal of creating more sustainable communities. Under the Sustainable Communities Act, the California Air Resources Board (ARB) sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, ARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). ARB periodically reviews and updates the targets.

SB 375 requires metropolitan planning organizations (MPO) to prepare a "sustainable communities strategy" (SCS) in conjunction with their Regional Transportation Plan (RTP). The City of Los Angeles is a member of the SCAG MPO, which adopted the 2016-2040 RTP/SCS in 2016. The document provides integrated land use and transportation strategies and policies intended to reduce the region's GHG emissions from passenger vehicle use to meet the GHG reduction targets set by the California Air Resources Board. The RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept SCAG's determination that the SCS, if implemented, would meet the regional GHG targets. Downtown Plan consistency with the 2016-2040 RTP/SCS is analyzed under Impact 4.10-2.

Complete Streets Act (AB 1358)

Assembly Bill 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by former Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists. At the same time, the California Department of Transportation (Caltrans) unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

REGIONAL

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The 2016-2040 RTP/SCS, the most recent SCAG RTP/SCS, was adopted by SCAG in April 2016 and approved by CARB. The RTP/SCS provides an integrated transportation and land use vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties (SCAG 2016-2040 RTP/SCS). The RTP portion of the 2016-2040 RTP/SCS identifies priorities, goals and policies, and performance measures for transportation planning and improvements to ensure that future projects are consistent with other planning goals for the area. Transportation projects being constructed within the SCAG region must be listed in the 2016-2040 RTP/SCS. The SCS portion of the 2016-2040 RTP/SCS presents an overall land use concept for the region with increasing focus on long-term emission reduction strategies for rail and trucks; expanding the region's high-speed and commuter rail systems; expanding active transportation; leveraging technological advances for transportation; and making the region more resilient to climate change. The RTP/SCS is intended to aid local jurisdictions in developing local plans and addressing local issues of regional significance.

Regional Housing Needs Assessment (RHNA)

The RHNA is a key tool used by SCAG and its member governments to plan for growth. The 5th cycle Final RHNA Allocation Plan was adopted by the SCAG Regional Council on October 4, 2012 and quantifies the need for housing within each jurisdiction between 2013 and 2021. Communities then plan and determine how they will address this need through the process of completing the housing elements of their general plans. The RHNA allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment. The RHNA is produced periodically by SCAG, as mandated by State law, to coincide with the region's schedule for preparing housing elements. It consists of two measurements: 1) existing need for housing and 2) future need for housing (SCAG 2012).

The existing need assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding. The future need for housing is determined primarily using the forecasted growth in households in a community, historical growth patterns, job creation, household formation rates, and other factors. The need for new dwelling units is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition, and encourage acceptable levels of housing upkeep and repair. The RHNA also accounts for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors – household growth, vacancy need, and replacement need – form the “construction need” assigned to each community. In addition, the RHNA considers how each jurisdiction might grow in ways that will decrease the concentration of low-income households in certain communities. The need for new housing is distributed among different income groups so that each community moves closer to the regional average income distribution.

Airport Land Use Compatibility Plan

An Airport Land Use Compatibility Plan is a planning document that contains policies for promoting safety and compatibility between public use airports and the communities that surround them. The Los Angeles County Airport Land Use Commission has adopted the comprehensive Los Angeles County Airport Land Use Compatibility Plan that covers all 15 airports within its jurisdiction, including those within the City of Los Angeles (Los Angeles County 2018). The Los Angeles International Airport, the Whiteman Airport, and the Van Nuys Airport are located in the City of Los Angeles. The Hollywood Burbank Airport is located adjacent to the City of Los Angeles boundary and a portion of the Hollywood-Burbank Airport’s Airport Influence Area is located in the City of Los Angeles.

LOCAL

City of Los Angeles General Plan

California law requires that cities prepare and adopt a comprehensive, integrated, long-term General Plan to direct future growth and development. The General Plan is the fundamental policy document of a city. It defines how a city’s physical and economic resources are to be managed and utilized over time. Decisions by a city with regard to the use of its land, design and character of buildings and open spaces, conservation of existing and provision of new housing, provision of supporting infrastructure and public and human services, and protection of residents from natural and man-caused hazards are guided by and must be consistent with the General Plan. State law requires general plans to contain seven elements: land use, circulation, housing, conservation, open space, noise, and safety. Cities can also adopt additional General Plan elements.² The Land Use Element of the City of Los Angeles General Plan is composed of 35 community plans, which are the official guides to the future development of the City. The 35 Community Plans guide the location and intensity of private and public uses of land; direct the arrangement of land uses, streets, and services; and encourage the economic, social, and physical health, safety, welfare, and convenience of people who live and work in the community. In addition to incremental updates to the City’s Land Use Element through the Community Plan update program, the City of Los Angeles launched a program to update the City’s General Plan in 2018. This effort will result in a new 20-year citywide plan for the sustainable development of the City.

² Effective in January 1, 2018, SB 1000, requires that when an agency updated more than two elements the agency is required to adopt an environmental justice element or include environmental justice related goals, policies, and objectives integrated in other elements, “that identifies disadvantaged communities within the area covered by the general plan of the city, county, or city and county, if the city, county, or city and county has a disadvantaged community.”

The City's elements, other than land use, include:

- Framework Element
- Air Quality Element
- Conservation Element
- Housing Element
- Noise Element
- Open Space Element
- Service Systems Element/Public Recreation Plan
- Safety Element
- Mobility Element (Mobility Plan 2035)
- Plan for a Healthy Los Angeles

Some of the key elements are discussed below.

Framework Element

Vision for Growth and Guide for Community Plan Updates

The City's General Plan Framework Element (GPF) establishes the overarching guide for how Los Angeles will grow in the future. Adopted in 1996 and again in 2001, the Framework Element is a strategy for long-range growth and development, setting a citywide context for the update of Community Plans and citywide elements. The Framework Element responds to state and federal mandates to plan for the future by providing goals, policies, and objectives on a variety of topics, such as land use, housing, urban form, open space, transportation, infrastructure, and public services. The General Plan Framework Element's key guiding principles, summarized below, are advanced at the community-level through the Community Plans:

- *Grow strategically.* Should the City's population continue to grow, as is forecasted by SCAG, growth should be focused in a number of higher-intensity commercial and mixed-use districts, centers, and boulevards, particularly in proximity to transportation corridors and transit stations. This type of smart, focused growth links development with available infrastructure and encourages more walkable, transit-friendly neighborhoods, helping to ease reliance on the automobile, and minimize the need for new, costly infrastructure.
- *Conserve existing residential neighborhoods.* By focusing much of the City's growth in centers and along commercial corridors, the City can better protect the existing scale and character of nearby single- and multi-family neighborhoods. The General Plan Framework Element encourages the preservation of the unique character of different residential neighborhoods whenever possible.
- *Balance the distribution of land uses.* Maintaining a variety of land uses is crucial to the long-term sustainability of the City. Commercial and industrial uses contribute to a diverse local economy, while residential uses provide necessary housing for the community. Integrating these uses within smaller geographical areas can better allow for a diversity of housing types, jobs, services, and amenities to be located in close proximity to each other to improve transit access and reduce auto dependence.
- *Enhance neighborhood character through better development standards.* Better development standards are needed to both improve the maintenance and enhancement of existing neighborhood character, and ensure high quality design in new development. These standards are needed for all types of development; residential, commercial, and industrial uses.

- *Create more small parks, pedestrian districts, and public plazas.* While regional parks and green networks are an important component of the City's open space strategy, more small-scale, urban open spaces must be developed as well, as they are crucial to the quality of life of the City's residents. There are many opportunities at the community level to create public "pocket" parks as part of new developments, to enhance pedestrian orientation in key commercial areas, and to build well-designed public plazas.
- *Improve mobility and access.* The City's transportation network should provide adequate accessibility to jobs, services, amenities, open space, and entertainment, and maintain acceptable levels of mobility for all those who live, work, travel, or move goods in Los Angeles. Attainment of this goal necessitates a comprehensive program of physical infrastructure improvements, traffic systems management techniques, and land use and behavioral changes that reduce vehicle trips. An emphasis is placed on providing for and supporting a variety of travel modes, including walking, bicycling, public transit, and driving.
- *Identify a hierarchy of commercial districts and centers.* The Framework Element provides an overall structure and hierarchy for the City's commercial areas. This hierarchy, which includes Neighborhood Districts, Community Centers, Regional Centers, and Mixed-Use Boulevards, has helped shape the development and urban form of the City and will continue to do so in the future. Understanding this hierarchy helps us better understand the roles that these different types of "activity centers" play within our communities so that their unique characteristics can be enhanced.

The Framework Element of the General Plan will be amended to include new General Plan land use designations that are introduced as part of the Downtown Plan. The proposed designations are designed to convey the Downtown Plan's land use strategy and to facilitate their limited applicability in the Downtown Plan Area. The proposed land use designations and their objectives are described under Proposed General Plan Land Use section further below.

Mobility Plan 2035

Mobility Plan 2035, adopted in September 2016, as an update to the Transportation Element, serves as the circulation element of the General Plan (not including public utilities and facilities). Mobility Plan 2035 establishes new street designations, classifies each of the City's arterial streets and incorporates a "complete street" policy framework (i.e., the idea that transportation facilities should be designed for all types of users, including pedestrians, cyclists, and trucks, as well as passenger vehicles), thus providing a foundation for future policies and principles promoting residents' interaction with their streets.

Housing Element 2013 to 2021

The primary goal of the City's Housing Element is to provide policies, objectives, and programs that encourage a range of housing opportunities for all income groups. It proactively directs long-range citywide policy goals and objectives by quantifying growth in terms of housing needs. Pursuant to state law, the Housing Element must identify sites that can accommodate existing and future housing needs identified in the RHNA prepared by SCAG. Sites identified in the Housing Element can be developed with housing without the need for any discretionary zoning action by the City. The City's Housing Element identifies 443 sites in the Central City Community Plan Area and 453 sites in the Central City North Community Plan Area that could provide 17,893 and 11,490 net new units, respectively.

Los Angeles Municipal Code (LAMC)

Development in the City is also governed by the City of Los Angeles Zoning Code (Chapter 1 of the LAMC), which regulates development through zoning designations and development standards. The Comprehensive Zoning Plan of the City of Los Angeles (Zoning Ordinance) set forth in LAMC Section

12.00 et seq. includes development standards for zoning districts in the City. LAMC Section 13.00 et seq. includes development standards for various supplemental use districts in the City that apply to specific parcels. The LAMC is currently undergoing a comprehensive update to all Zoning Code sections as part of the re:code LA effort. re:code LA, which started in 2013 and will continue through 2020, will update the Zoning Code to make the Code more streamlined, visual, and easy to use. The existing Zoning Code regulations are not being repealed as part of this Project. The existing Zoning Code will continue to be located in Chapter 1 of the Los Angeles Municipal Code, while the New Zoning Code will be located in a new Chapter 1A of the Los Angeles Municipal Code. Relevant components of re:code LA are described in detail in Chapter 3.0, *Project Description*.

Affordable Housing Linkage Fee Ordinance

On December 13, 2017, Mayor Eric Garcetti passed the Affordable Housing Linkage Fee Ordinance. The ordinance requires developers to pay a fee for new development projects in order to mitigate the need for affordable housing associated with the new project. The ordinance exempts new development projects with at least 40 percent moderate-income dwelling units, 20 percent low-income households, 11 percent very low, or 8 percent extremely low-income dwelling units, public institution projects, hospitals, grocery stores, and other categories of development.

Residential Hotel Unit Conversion and Demolition Ordinance

The Residential Hotel Unit Conversion and Demolition Ordinance (RHO) prohibits conversion or demolition of dwelling units in a residential hotel without approval from the Housing + Community Investment Department (HCIDLA). The ordinance adds Article 7.1 to Chapter IV of the LAMC and amends Sections 91.106.4.1, 151.06, and 151.09 (City of Los Angeles 2008). The ordinance seeks to preserve dwelling units provided by residential hotels, which often serve as affordable housing for the very low income, elderly, and disabled (HCIDLA 2018).

Rent Stabilization Ordinance

LAMC Chapter XV encodes the City's Rent Stabilization Ordinance (RSO). Generally, the Rent Stabilization Ordinance (RSO) applies to rental properties that were built on or before October 1, 1978, as well as replacement units. The RSO applies to most dwelling units with the exception of single-family homes that solely occupy a parcel and caps annual rent increases for continuing tenants based on the Consumer Price Index averaged for a 12-month period.

Transit Oriented Communities Affordable Housing Incentive Program

The Transit Oriented Communities Affordable Housing Incentive Program (TOC Program) was developed pursuant to Section 6 of Measure JJJ, which was passed by City voters in 2016 (LADCP 2018a). The program provides incentives for developers to build properties that include affordable units within a one-half mile radius of a major transit stop. TOC Program Guidelines were released by the City Planning department on September 22, 2017 and last revised on February 26, 2018.

Development projects can qualify for incentives under one of four tiers (Tier 1 through 4). Each tier has different eligibility requirements related to the type of transit options located in proximity to the property and the composition of affordable units offered. The higher the tier number, the more transit options and affordable housing units a development needs to qualify. All TOC-eligible developments receive baseline incentives, which include an increase in the number of allowable dwelling units, an increase in the allowable floor-area ratio (FAR), and reduced parking requirements. Developments with a higher tier number are also eligible for additional incentives with higher tiers being permitted a greater number of additional incentives.

Value Capture Ordinance

On December 13, 2017, the City Council approved the Value Capture Ordinance (City of Los Angeles 2017). The ordinance requires residential and mixed-use development projects seeking a development density or FAR higher than permitted, through entitlements not subject to Measure JJJ such as Conditional Use Permits (CUPs) to provide a certain percent of restricted affordable dwelling units. The ordinance also provides an additional density bonus for projects that provide restricted affordable units beyond the minimum percentage required (LADCP 2017b).

Citywide Specific Plans, Overlays, Districts, and Master Plans

Specific plans, planning overlays, supplemental use districts, and master plans are used to ensure development throughout the City is compatible with the surrounding environment. These tools customize the regulations of the LAMC to plan the land use and zoning of specific geographic areas and include various types of regulatory limitations. The City includes several types of overlays, districts, and master plans which further implement the General Plan, as summarized below (LADCP 2018b): These overlays, districts, and master plans are applied throughout the City and can be found in various Community Plan areas. However, not all of these overlays are applied within the Downtown Plan Area. See the next section for a summary of overlays that are applied within the Downtown Plan Area.

Overlays, Districts, and Master Plans

- **Specific Plans.** Specific Plans provide supplemental development regulations, including allowed and prohibited uses, tailored development standards, and other regulatory controls tailored to ensure that development enhances the unique qualities of an area. There are currently 52 adopted and active specific plans in the City (LADCP 2020).
- **Community Plan Implementation Overlays.** Community Plan Implementation Overlays (CPIO) serve the same purpose as specific plans but are prepared at Community Plan level and implement supplemental standards through the creation of subareas within the Community Plan. The City has five Community Plan Implementation Overlays (Sylmar, West Adams, South Los Angeles, Southeast Los Angeles and San Pedro).
- **Community Design Overlay Districts.** Community Design Overlay Districts are intended to improve the appearance and enhance the identity of certain areas in the City through the application of design guidelines and standards. The City has 20 Community Design Overlay Districts (LADCP 2020).
- **Pedestrian/Neighborhood Oriented Districts.** Areas within a Pedestrian/Neighborhood Oriented District are subject to specific frontage, setback, access, and use requirements to enhance the pedestrian network. The City has three Pedestrian/Neighborhood Oriented Districts.
- **Streetscape Plans.** Streetscape Plans set forth visions for public corridor improvements. Streetscape Plans direct the implementation of streetscape improvements along designated corridors in several Community Plan areas. The City has 18 Streetscape Plans (LADCP 2020).
- **Local Coastal Programs.** Local Coastal Programs (LCPs) guide development in the coastal zone to protect coastal resources and comply with the California Coastal Act of 1976. Each LCP includes a land use plan and measures to implement the plan (such as a zoning ordinance). The Venice Land Use Plan has been certified by the Coastal Commission; however, the implementation plan has not been certified, therefore, the Venice LCP as a whole has not been certified (LADCP 2018c). The San Pedro LCP is also currently being drafted.

- **Master Plans.** The Port of Los Angeles Master Plan and the Los Angeles International Airport Master Plan regulate land use and establish policies and guidelines to direct future development within their boundaries.
- **Commercial Artcraft Districts.** Commercial Artcraft Districts regulate uses and conditions (i.e., production techniques, area of production, employees, etc.) to create enclaves for artisan segments of the population to live, create, and market their artifacts. The City has one Commercial Artcraft District located in North Hollywood.
- **Community Redevelopment Plan Areas.** Community Redevelopment Areas are areas identified for revitalization through the building of new housing and commercial projects. The City contains 19 Redevelopment Plans that are in effect until they expire or Community Plan updates supersede their provisions as permitted by each adopted redevelopment Plan (LADCP 2020).
- **Sign Districts.** Sign Districts prescribe more permissive sign regulations than the Zoning Code to support unique local characteristics. The City has 14 Sign Districts.
- **Supplemental Use Districts.** The LAMC includes several other supplemental use districts that apply additional regulations beyond those required by base zoning. Supplemental use districts include those for Oil Drilling, Animal Slaughtering, Surface Mining Operations, Residential Planned Development, Equine keeping, Mixed Use, Fence Heights, Neighborhood Stabilization, Residential Floor Area, Modified Parking Requirement, Hillside Standards Overlay, Rear Detached Garage, and Hillside Construction Regulation.

Downtown Plan Area Specific Plans and Overlays

The Downtown Plan Area includes the following specific plans and overlays.

Specific Plans

Los Angeles Sports and Entertainment District Specific Plan

The Los Angeles Sports and Entertainment District (LASED) Specific Plan provides regulations and incentives to support the development of the Specific Plan Area as a major entertainment/ mixed-use area with primarily hotel, retail, entertainment, and residential uses and has the goal of enhancing the existing Convention Center and Staples Center environs (LADCP 2010). The Specific Plan specifies development standards, permitted uses, design guidelines, traffic improvements, parking requirements, and permitted signage. The LASED Specific Plan Area consists of five blocks surrounding the Staples Center along its north and east sides. The Specific Plan went into effect October 2001 and was last amended in 2010.

Bunker Hill Specific Plan

The Bunker Hill Specific Plan, adopted in June 2013, provides a regulatory framework to support development of the Bunker Hill neighborhood into a 24-hour downtown environment with a mix of commercial, retail, residential, and cultural spaces (LADCP 2013b). The Specific Plan Area is bounded generally by the 110 Freeway to the west, Fifth Street to the south, Hill Street to the east, and First Street to the north. The Specific Plan includes development standards, urban design guidelines, and transportation and parking regulations, and also establishes a pedestrian linkage network for the area.

Alameda District Specific Plan

The Alameda District Specific Plan, effective in June 1996, provides a regulatory framework to support the development of the area as a major transit hub for the region with adjacent mixed-uses. The Specific Plan Area includes Union Station and the associated Terminal Annex area and is generally bounded to the south by U.S. 101, to the west by Alameda Street, and to the north and east by Vignes Street. The Specific Plan outlines specific projects to be developed over three phases and provides regulations pertaining to urban design, open space, pedestrian connections, landscaping, transportation, traffic improvements, and parking; it also includes incentives for child care provision.

Cornfield Arroyo Seco Specific Plan

The Cornfield Arroyo Specific Plan, adopted in December 2012, establishes four new zoning districts, zoning standards, and additional requirements for an industrialized area adjacent to the Los Angeles River near the intersection of the Harbor Freeway and I-5 (LADCP 2012b). The Specific Plan Area encompasses the northeast corner of the Downtown Plan Area south and east of the train tracks that run parallel to Broadway, west of the Los Angeles River, and north of College Street, Alhambra Avenue, and Bolero Lane. The four zones introduced by the Specific Plan—Urban Center, Urban Innovation, Urban Village Zone, and Greenway—support a wide variety of uses including light industrial and manufacturing uses, urban agriculture, multi-family residences, public facilities, social and environmental organizations, religious institutions, and schools. Notably, the Specific Plan does not include parking requirements due to the proximity of Metro rail and other public transit, and incentivizes affordable housing (Nettler 2012).

Downtown Design Guide

Adopted in 2009, the Downtown Design Guide (DDG) provides urban design standards and guidelines for new construction (including additions) in the following Downtown neighborhoods: Convention Center, South Park, City Markets, Historic Downtown, Financial Core, Little Tokyo, Civic Center South, Bunker Hill, and Civic Center. These neighborhoods collectively comprise the majority of the Central City Community Plan Area. Topics addressed in the Guide include sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing, on-site open space, architectural detail, streetscapes, and signage.

Greater Downtown Housing Incentive Area

Ordinance 179,076 established the Greater Downtown Housing Incentive Area in 2007, providing a range of incentives to develop affordable housing in those portions of the Central City and Southeast Community Plan Areas generally bounded by U.S. 101 to the north, the 110 Freeway and Figueroa Street (south of Adams Boulevard) on the west, Alameda and Grand Avenue (south of 21st Street) to the east, and Washington Boulevard and Martin Luther King, Jr. Boulevard (west of Broadway) to the south. Specific bonuses include increased allowable floor area, reductions in required open space, and reductions in required parking for projects that include minimum affordable housing set-asides.

River Improvement Overlay (RIO) District

The RIO District (Ordinance Nos. 18314 and 183145) went into effect in August 2014 and is intended to help implement the vision and goals of the Los Angeles River Restoration Master Plan (LARRMP) by establishing additional requirements for properties along the riverfront or near the riverfront. These primarily include requirements pertaining to landscaping, fencing, exterior lighting, and ADA accessibility that serve to build a riverfront community and make the riverfront area a more welcoming environment to pedestrians and cyclists. Within the Downtown Plan Area, the RIO District includes all of the Central City North Community Plan Area south of Cesar E. Chavez and the area east of N. Spring Street north of Cesar E. Chavez.

Broadway Theater and Entertainment Design Guide and Community Design Overlay (CDO)

The Broadway CDO applies to Broadway between 1st Street and 12th Street in the Central City Community Plan Area. The Broadway CDO encourages the rehabilitation of existing building and guides the design and development of new buildings. Regulations include guidance for building setbacks, form, roof lines, building articulations, storefront and window transparency, facade materials, and lighting.

Broadway Streetscape Master Plan

The Broadway Streetscape Master Plan applies to properties fronting Broadway from First Street and Twelfth Street. The Master Plan was established to create a multi-modal, pedestrian focused street that can support and revitalize the historic theater district. The Streetscape guidelines call for expanded sidewalks with street elements and limited landscaping to enhance pedestrian interest and activity along the street.

Historic Broadway Sign Supplemental Use District (SUD)

The Historic Broadway SUD applies to Broadway from First Street to Twelfth Street, encompassing the Broadway Theater and Entertainment District and parcels front along intersecting streets. It includes standards for the design, placement, and orientation of signs along Broadway. It allows and provides guidance for sign types that are currently on Broadway, but are not allowed by the existing Code regulation. The Sign District includes an incentive program to spur building activity, revitalization, and to fund streetscape improvements.

Downtown Street Standards

The Downtown Street Standards apply in the Central City Community Plan Area. It establishes a street hierarchy and guidance to balance traffic flow, pedestrian walkability, bicycle routes, and access to create more context-sensitive, *complete streets* in Downtown. The document consists of a series of cross sections establishing future curb and property lines, and in some cases additional sidewalk easements.

Little Tokyo Community Design Overlay (CDO)

The Little Tokyo CDO applies to a portion of the Little Tokyo community in the Central City Community Plan Area. It establishes design and development guidelines to promote a pedestrian-friendly environment and enhance the physical appearance of the area, with a focus on reinforcing the cultural and historic aspects of the neighborhood through a set of Design Guidelines.

Community Redevelopment Project Areas

Community Redevelopment Areas (CRA) are areas identified for revitalization through the building of new housing and commercial projects. Prior to 2012, the Community Redevelopment Agency of Los Angeles (CRA/LA) was the agency in charge of developing, implementing, and overseeing CRA projects in the City (Urban Land Institute, Los Angeles 2012). The passage of AB1x-26 and the California Supreme Court's decision in *California Redevelopment Association v. Matosantos* in 2012 effectively abolished redevelopment agencies in the State. Since the dissolution of the CRA/LA, activities in the redevelopment project areas have been administered through the Designated Local Authority (DLA). The Downtown Plan Area includes three CRAs: Chinatown (expires January 2022), City Center (expires May 2033), and Central Industrial (expires November 2033) (LADCP 2018d).

- The **Chinatown Redevelopment Plan** designates land uses and specifies the Agency's powers and requirements in Plan implementation (CRA/LA 2002a). The Redevelopment Plan Area is generally bounded by Cesar E. Chavez Avenue to the south, Solano Avenue to the north, Alameda Street to the east, and shares the Downtown Plan Area boundary to the west.

- The **City Center Redevelopment Plan** designates land uses, specifies the Agency's powers and requirements in Redevelopment Plan implementation, identifies distinct development areas within the Redevelopment Plan Area (i.e., City Markets, South Park, Historic Downtown), and includes specific requirements for development within the Redevelopment Plan Area. The Redevelopment Plan Area is generally bounded to the south by the I-10; to the west by Figueroa Street, Grand Avenue, and Hill Street; to the north by Second Street; and to the east by Los Angeles Street, San Pedro Street, Stanford Avenue, and Griffith Avenue.
- The **Central Industrial Redevelopment Plan** designates land uses and specifies the Agency's powers and requirements in Redevelopment Plan implementation and includes specific requirements for development within the Redevelopment Plan Area. The Redevelopment Plan Area encompasses most of the area bounded to the south by the I-10; to the west by Stanford Avenue and San Pedro Street; to the north by Third Street; and to the east by Alameda Street. It also encompasses an irregularly shaped area that is generally bounded by Washington Boulevard to the south, the train tracks paralleling the Los Angeles River to the east, Third Street to the North, and Lemon Street, Wilson Street, and Alameda Street to the west.

ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the *CEQA Guidelines*, a project would have a significant impact related to land use and planning if it would:

- Physically divide an established community (Threshold 4.10-1)
- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Threshold 4.10-2)

METHODOLOGY

A community can be physically divided by the construction of a new road, freeway, or railway that effectively isolates a portion of the community from the remainder of the community, or when major land use and zoning changes results in radically different land use patterns that can physically divide a neighborhood by creating a new street pattern that impedes access from one area to another. Therefore, the potential of the Project to physically divide an established community (Threshold 4.10-1) is evaluated by determining whether implementation of the Downtown Plan or New Zoning Code would result in the construction of major new roads, freeways, railways, or other barriers through an existing neighborhood.

The discussion of a significant impact with regard to conflicts with any applicable land use plan, policy, or regulation serves two purposes: identifying significant impacts related to land use and compliance with CEQA Guidelines Section 15125(d), which requires that an EIR include a discussion of any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant environmental impact under CEQA unless the inconsistency would result in an adverse physical change to the environment (per CEQA Guidelines Section 15382). An excerpt from the legal practice guide CEB, Practice under the California Environmental Quality Act, Section 12.34 illustrates this point:

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

Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies (Governor's Office of Planning and Research 2017). Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives, but need not be in perfect conformity with every plan policy.

The Downtown Plan would comprise a portion of the Land Use Element for the City of Los Angeles and would need to be consistent with other elements in the General Plan. The New Zoning Code would also need to be consistent with the General Plan. In addition, Los Angeles is a member of SCAG and is subject to policies established for the region in the 2016-2040 RTP/SCS. Therefore, the potential of the Downtown Plan or New Zoning Code to conflict with an applicable land use plan, policy, or regulation (Threshold 4.10-2) is evaluated by comparing the Proposed Project to applicable policies and objectives contained in the City's General Plan and the 2016-2040 RTP/SCS. For purposes of identifying significant impacts related to conflict with any applicable land use plan, policy, or regulation, they can be either direct or indirect. Direct impacts interfere with land use plans, including habitat or wildlife conservation plans that result in significant environmental effects. Land use compatibility is typically addressed based on direct physical environmental impacts – primarily noise and air quality but also aesthetics, traffic, hazards, water quality and other physical environmental issues, i.e. where one use generates physical impacts that could significantly adversely affect another use. These issues are generally addressed through existing regulations and policies and are comprehensively addressed in each environmental issue area in this document and summarized as applicable and appropriate in the discussion of Impact 4.10-2, below. As related to impact analysis, this section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation and are generally addressed in other topical sections of this Draft EIR. For example, air impacts resulting from increased car trips as a result of reasonably anticipated development under the Proposed Plan would be discussed in the air impact section of this Draft EIR; public service impacts resulting from increased demand from increased development under the Proposed Plan is discussed in public services section of this Draft EIR.

DOWNTOWN PLAN

The proposed Downtown Plan is a comprehensive update of the Central City Community Plan and the Central City North Community Plan, the two community plans covering Downtown Los Angeles. These plans are two of the City's 35 Community Plans that make up the City's Land Use Element. The Central City Community Plan was last updated in 2003 and the Central City North Community Plan was last updated in 2000. The Proposed Downtown Plan is intended to guide development through the year 2040. The Downtown Plan creates new employment and housing opportunities throughout Downtown, and particularly in areas near transit, consistent with the Citywide comprehensive growth strategy identified in the City's Framework and Housing Elements. The Plan would guide the physical development in Downtown Plan Area in a sustainable manner while protecting existing neighborhoods, open space areas, and public facilities parcels. The Downtown Plan components are described in more detail below, and can also be found in Chapter 3.0 Project Description.

The Proposed Downtown Plan is comprised of several components including:

- (i) General Plan Amendments to the Community Plan (Land Use Element) Text and Land Use Maps
- (ii) Zoning Ordinances, including adopting zone changes to amend the Zoning Maps
- (iii) Other General Plan Amendments, including to the Framework Element, Mobility Plan, Specific Plans, and other necessary amendments

The Community Plan Text document contains the vision for the Downtown Plan Area and lays out goals, policies, and programs to achieve that vision. The Community Plan Text policies call for providing new housing opportunities at a range of housing affordability levels and unit types, improving the function, design, and economic vitality of Downtown, promoting a range of industries, and preserving and enhancing unique characteristics of existing uses and structures.

The Downtown Plan includes a General Plan Land Use Map that shows the distribution of land uses in the Plan Area, noted in component (i) above. The Proposed Downtown Plan would result in the reallocation of land uses and would adopt land use changes (officially called General Plan Amendments), and zoning ordinances in order to achieve the vision for the Plan area. These zoning ordinances will apply New Zoning Code regulations, developed through re:code LA, the comprehensive revision of the City's zoning code. See Chapter 3.0, *Project Description*, Section 3.7.4 for more details.

Tables 4.10-1 and **4.10-2** summarize the existing and proposed land uses associated with the Downtown Plan. As described above, the Downtown Plan is applying a new set of General Plan Designations and zoning tools to the entire Downtown Plan Area. **Tables 4.10-1** and **4.10-2** include the existing and proposed General Plan Land Use designations, categorized by broader land use categories. See Chapter 3.0, *Project Description*, for a detailed description of the proposed General Plan Designations and corresponding zoning tools.

The Downtown Plan would primarily increase the residential, commercial, and hybrid industrial development potential throughout the Downtown Plan Area, while having the added benefit of creating more compact, walkable neighborhoods that can also accommodate future growth.

The commercial designations allow for a range of land uses, including residential and at intensities that generally complement existing patterns of development and supports a walkable community, where daily services and shopping needs can be met within walking distance of existing and future residential and mixed-use buildings.

The proposed commercial land use designations include Villages, Community Center, Traditional Core, and Transit Core, which recognize the existing mixed use nature of Downtown. These designations permit residential, office, commercial, heavy commercial, and institutional activities, both in neighboring structures, and within individual mixed use developments. This recognizes the mix of uses that exist within areas such as South Park, which is designated High Residential in the existing Central City Community Plan, and contains residential uses, as well as office, commercial, and neighborhood serving activities within mixed use development. Under the Downtown Plan, South Park would be designated Transit Core, which continues to allow for a variety of residential and community-serving activities with greater levels of development capacity to occur in the future.

TABLE 4.10-1 SUMMARY OF EXISTING LAND USE IN THE DOWNTOWN PLAN AREA	
Land Use Categories with Existing General Plan Designations	Existing Plan (Acres)
Residential	212
Multi-Family	
Low-Medium II	14
Medium Residential	36
High Medium Residential	77
High Residential	85
Commercial	690
Community Commercial	103
Regional Commercial	12
Regional Center Commercial	114
General Commercial	461
Industrial	1,520
Commercial Industrial	15
Light Industrial	8
Light Manufacturing	559
Heavy Manufacturing	829
Hybrid Industrial	109
Public Facilities	592
Public Facilities	487
Public Facilities - Freeway	99
Other Public Open Space	6
Open Space	224
Open Space	224
TOTAL	3,238
SOURCE: City of Los Angeles Department of City Planning, 2018	

Consistent with the General Plan Framework Element, land for industrial uses would be retained under the Downtown Plan. The proposed Production designation would protect and sustain industrial activity and serve as a center of employment for heavy industrial, manufacturing and storage, heavy commercial and light industrial activity, including production, wholesale and distribution uses.

The Downtown Plan proposes to re-designate some of the industrial land as Hybrid Industrial and Markets, which are designed to account for the evolution of land uses and employment activities over time. The proposed designations will continue to allow for light industrial and manufacturing uses, in addition to non-industrial uses, namely limited residential as long a minimum area is set aside for productive uses. Hybrid Industrial and Markets designations would allow for a greater variety of industrial, and employment uses such as office, heavy commercial, and light industrial, and limited residential uses would be permitted only when a minimum area is reserved for productive uses. The higher development potential permitted under the Downtown Plan will enable higher intensity of employment uses within these areas, while accommodating limited residential uses in proximity to job-generating uses.

These designations are being applied in areas with an existing mix of light industrial, wholesale, and limited residential activities. One example is the Arts District, which is designated Heavy Manufacturing in the existing Central City North Community Plan, and contains a variety of housing types, including adaptive reuse and live/work, as well as office, commercial, light industrial and assembly, and light manufacturing uses. The Hybrid Industrial and Markets designations would allow for a limited amount of residential and live-work use not previously allowed by-right in the industrial designated areas.

This would help transition the existing employment emphasis areas to the surrounding mixed-use neighborhoods. The changes in designations, zoning, and associated increase in allowable floor area would allow a greater range of uses and higher development potential within the Hybrid Industrial and Markets area, and promote reuse of existing structures, creating more vibrant neighborhoods that link surrounding areas to transit resources. These changes would allow the intensification of land uses in an urbanized area

of the city, promote a greater mix of uses that would foster more walkable and compact development patterns, and allow the City to meet growth demands for jobs and housing in the area.

TABLE 4.10-2 SUMMARY OF PROPOSED LAND USE IN THE DOWNTOWN PLAN AREA	
Land Use Categories with Proposed General Plan Designations	Downtown Plan (Acres)
Residential	100
Neighborhood Medium Residential	100
Commercial	923
Villages	85
Community Center	195
Traditional Core	127
Transit Core	516
Industrial	1,372
Production	557
Hybrid Industrial	426
Markets	389
Public Facilities	625
Public Facilities	428
Public Facilities Freeways	197
Open Space	214
Open Space	214
	3,234/a/
/a/ Total acreage for each land use designation and proposed designation reflects rounding to the nearest whole number, which results in a slight difference from 3,238 acres under existing land uses.	
SOURCE: City of Los Angeles Department of City Planning, 2018	

PROPOSED PLAN GENERAL PLAN LAND USE DESIGNATIONS

The following General Plan Designations have been created in order to implement this land use strategy and achieve the Downtown Plan underlying purpose and objectives stated in Chapter 3.0, *Projection Description*. The following designations replace the existing designations for the Downtown Plan Area. For more details about the proposed designations and zoning regulations, see Chapter 3.0, *Project Description*.

These designations recognize the mixed use nature and varying scales of development that exist within the Downtown Plan Area, and they have been designed to reinforce and better accommodate a mixed-use environment.

Transit Core

Transit Core areas are dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form ranges from Moderate Scale to High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock.

Community Center

Community Centers are vibrant places of activity typically located along commercial corridors, in concentrated nodes, or adjacent to major transit hubs. The building form ranges from Low Scale to Mid Rise, and may extend to Moderate Rise in the Downtown Community Plan. The use range is broad and may include commercial, residential, institutional facilities, cultural and entertainment facilities, and neighborhood-serving uses.

Traditional Core

Traditional Core areas have a time-honored urban development pattern and a collection of historically-significant buildings. The building form ranges from Moderate Scale to High Rise. Traditional Core areas often include residential and office use, neighborhood-serving uses, as well as dining and entertainment that draw visitors and tourists, supporting activity around the clock. New development contributes to a pedestrian-oriented environment with active alleys and inviting shopfronts.

Markets

Markets are bustling centers of commercial activity, each with its own mini-economy of specialized commercial uses, including wholesale. The building form generally ranges from Very Low Rise to Low Rise, and Mid Rise to Moderate Rise. Adaptive-reuse and rehabilitation of structures and warehouses maintain the built environment and support sustainable development. Uses also include retail, limited housing, and goods movement activities.

Hybrid Industrial

Hybrid Industrial areas preserve productive activity and prioritize employment uses, but may accommodate live/work uses or limited residential uses. The building form ranges from Very Low Scale to Mid Rise. Uses include light industrial, commercial, and office, with selective live/work uses.

Medium Neighborhood Residential

Medium Neighborhood Residential areas are primarily residential and may integrate limited local-serving commercial uses; these neighborhoods are adjacent and connected to commercial and employment areas. The building form is Low Scale, and buildings are typically oriented toward the street.

Villages

Villages are characterized by walkable and fine-grained block patterns that serve as historic and cultural regional niche market destinations. The building form is Very Low Scale, Low Scale, or Mid Scale. Commercial uses, such as restaurants, retail, services, and small offices may be interspersed with a range of housing types; commercial uses on the ground floor help promote a pedestrian atmosphere. Adaptive reuse of historic buildings and infill development is responsive to the historic and cultural legacy of these areas.

Production

Production areas preserve and sustain industrial activity while serving as a regional jobs base. The building form ranges from Very Low Scale to Low Rise. Site layout and development in these areas are flexible to accommodate goods movement, loading, and distribution needs. Uses include heavy industrial and evolving and innovative industries, such as light assembly and manufacturing, clean technology, incubators, and research and development facilities, are accommodated. Housing is generally not permitted in Production areas but limited residential uses may be allowed, for example, through adaptive reuse of existing buildings.

Open Space. Open Space areas primarily serve as public recreational sites or parks but can include reservoirs and nature reserves. These largely open areas are intended for passive and active outdoor recreation, public gathering, and education. The building form, if there are accessory structures or buildings on site, typically facilitates recreational and/or communal activities, such as playground equipment, restrooms, and community centers. The Open Space designation does not allow residential uses.

Public Facilities. Public Facilities areas serve as centers of civic life, promoting governmental, institutional, and cultural functions. These areas provide for the use and development of land typically owned by government agencies. The building form varies in size and structure, from Residential Agriculture to High Rise, with a variety of site layouts and flexible building designs that support civic activity and an active public realm. Uses include government offices, libraries, schools, and service systems. Housing is not typically associated with Public Facilities but may be permitted on a limited basis.

PROJECT IMPACTS

Threshold 4.10-1	Physically divide an established community
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Impact 4.10-1 **Downtown Plan:** The Downtown Plan does not include any features that would physically divide an established community. Therefore, ***no impact*** would occur.

New Zoning Code: The New Zoning Code does not include any standards that would divide an established community. Furthermore, due to the modularity of the New Zoning Code, it is not known where or to what extent future development may occur. The Proposed Project does not intend to implement the New Zoning Code outside of the Downtown Plan Area. For these reasons, any indirect impacts from the use of the New Zoning Code would be speculative. Impacts would be ***less than significant*** citywide.

Downtown Plan Impact

Downtown is an established regional center. With the exception of its open space areas, including Grand Park, the State Historic Park, and Pershing Square, the Downtown Plan area is urbanized with a mix of commercial, residential, light industrial, and institutional uses at varying densities and intensities. The open space areas are preserved by the Downtown Plan as undeveloped open space and recreation space. As described previously, the Downtown Plan Area is also the hub of the regional transportation system that terminates at Los Angeles Union Station.

The Proposed Downtown Plan would include amendments to the community plan land use map designations, zoning, and the community plan goals, policies, and programs, which are intended to support connectivity between districts, and improve transitions in land use, building scale, and urban design within the Downtown Plan Area.

Proposed Land Use and Zoning Strategies

The Downtown Plan would update the General Plan land use designations in the existing Central City and Central City North Community Plans with an entirely new set of General Plan Designations and associated zoning; these are detailed in Chapter 3.0 *Project Description*, which also includes definitions for the different forms and use districts, and **Figure 3-6** provides a General Plan map for the Downtown Plan Area.

The land use and zoning changes proposed in the Downtown Plan are intended to guide development through 2040 and largely continue the land use patterns envisioned in the existing Central City and Central City North Community Plans. The Downtown Plan does not introduce land uses that would include barriers that would divide existing neighborhoods. Rather, it would encourage land uses that complement and enhance the existing neighborhoods and district, thus maintaining and improving community cohesiveness. For example, land in the Fashion District, Flower District, and Toy District would be designated as Market or Hybrid Industrial, which would continue to accommodate the types of uses currently present in these areas and envisioned in existing plans; the commercial areas of Chinatown, which are more moderately sized, would remain zoned for moderate and mid-scale buildings, while Chinatown's residential areas

would be designated for low-scale and residential uses; and some areas with a concentration of existing industrial uses would be designated for Hybrid Industrial uses. Rather than fundamentally altering land use patterns in the Downtown Plan Area, the Downtown Plan designations generally allow for greater flexibility in land uses and higher development density and intensity, and also explicitly promote mixed-use and transit-oriented development. The Downtown Plan applies Form District and Frontage regulations, as well as building design guidelines that would create a more pedestrian-friendly environment and ensure compatibility between new and existing development. These zoning tools address how the building meets the street by regulating building orientation, scale, entrance spacing, and the amount of transparency (such as windows) and would not allow for the introduction of barriers that would divide or otherwise hinder access to individual neighborhoods or portions thereof. Requirements such as maximum building widths and required pedestrian connections through large blocks contribute to a more porous built environment that prioritizes walkability. Together, these tools encourage connectivity by linking new uses with the surrounding neighborhood and transit stations.

Proposed Policies and Programs

Downtown-Wide Policies; Chapter 1. Land Use & Urban Form

The Downtown Plan policies and programs acknowledge and preserve the character of neighborhoods, and promote connectivity and transitions between districts, including the following, taken from Chapter 2. Land Use and Urban Form:

Urban Form

- LU 9.1: Strategically concentrate the highest densities and intensities within the Plan area to respond to historic development patterns and match infrastructure investment.
- LU 9.2: Reinforce the distinct qualities of each neighborhood and ensure that growth complements and is compatible with existing character and historic resources; and supports community needs.

Arts District

As a formerly industrial and wholesale district, the Arts District first began to evolve into a neighborhood as artists began using industrial buildings as working and living spaces. The community has since evolved into a hub of galleries, educational institutions, creative production and light industry uses, commercial and retail uses, and business incubation spaces.

- LU 33.7: Introduce shared street typologies for Arts District streets that preserve historic industrial characteristics while promoting access and safety for all users.
- LU 33.8: Promote productive, creative, manufacturing, fabrication, and light industrial activities as a principal characteristic of the Arts District neighborhood.

Fashion District/South Markets

A highly diverse major fashion, retail, wholesale distribution, and creative center. This area is the hub for garment sales, retailing, manufacturing, the flower wholesale industry, and regional distribution.

- LU 37.10: Support specialty industry clusters, such as fashion and flowers, while allowing for evolution and innovation.

Little Tokyo

Little Tokyo is a historic-cultural neighborhood and symbolic center for the Japanese-American community. The neighborhood contains a variety of religious and cultural institutions and a mix of residential, commercial, and institutional uses. Small-scale shops, restaurants, and storefronts contribute to the pedestrian-oriented nature of the area, as well as a unique architectural and building design.

- LU 41.7: Retain, support, and reinforce the historic and cultural elements of Little Tokyo, including the businesses and cultural institutions within the community.

Chinatown

Chinatown is home to a long-standing multi-generational residential community, a variety of small and family owned businesses, family associations, and institutional services that serve the Chinese American as well as other communities. The historic neighborhood is characterized by walkable commercial corridors and internally oriented courtyard developments. A Metro Gold Line station sits at the northeastern corner of the neighborhood, and there has been a growing cluster of restaurant and nighttime activity.

- LU 41.10: Support and reinforce the historic and cultural components of Chinatown, including architectural design, and the long-standing local businesses and legacy institutions that serve the local community.
- LU 41.11: Promote courtyard-style commercial developments that are characteristic of the area and reinforce the neighborhood's historic pedestrian orientation and reflect the community's cultural heritage.

Toy District

The Toy District is a predominantly wholesale and retail district, distinct among other neighborhoods for its unique scale and uniform development pattern. The collection of narrow blocks consist of one and two story brick buildings with many shop front entrances, creating a system of narrow and curving pedestrian alleys.

- LU 41.13: Facilitate new development that will reinforce patterns of bay entrances and fine-grained narrow retail spaces within the Toy District.
- LU 41.14: Prohibit alley and street vacations to protect small blocks and lots.

Downtown-Wide Policies; Chapter 5. Mobility & Connectivity

The Downtown Plan Area is a fully developed, major urban center already served by extensive vehicle and transit services and infrastructure, including the I-10, U.S. 101, and I-110 freeways, national (Amtrak) and regional (Metrolink) rail service, many local and rapid bus lines, and the Metro Red, Purple, Gold, Blue, and Expo rail lines. Downtown Plan policies and programs do not propose any new freeways or major roadways that could physically divide or isolate existing neighborhoods in the Downtown Plan Area, although it does support the development of new transit infrastructure, such as:

- Advance efforts to plan for the future integration of high speed rail³ and other transit projects, such as the West Santa Ana Branch line and Link US, to reinforce Union Station and Downtown as the hub of regional transit. (Downtown Places & Neighborhoods, LU 21.16)

³ Based on recent changes in direction at the State level, the High Speed Rail Station appears unlikely to be built in the foreseeable future.

- Support the development of the Downtown Streetcar System to better connect districts. (Mobility & Connectivity, MC 5.4)
- Find opportunities to install bus platforms along key corridors to facilitate transit boarding and reduce conflicts with other modes. (Mobility & Connectivity, MC 5.6)
- Support the expansion of light and heavy rail transit service to Eastern Downtown to serve the expanding resident, worker, and visitor populations. (Mobility & Connectivity, MC 5.7)

The Downtown Streetcar System is intended to better integrate the Downtown area and would likely be built along major arterials with adequate space to support streetcar infrastructure and improve local circulation, rather than within the Downtown Plan Area's few truly residential communities, which lie north of the main Downtown area. Future expansion of light rail would likely occur along major arterials and integrated into the existing transportation system, rather than dividing a neighborhood, while heavy rail would be primarily below street level. Installation of bus platforms would occur along key corridors for existing transit and thus would not act as a dividing barrier in communities. In addition, an extensive transit system of bus and rail is a defining feature of metropolis centers all over the world and contributes to the creation of an integrated urban community, rather than its division.

The Downtown Plan would also support the development of two major rail enhancement projects, the High Speed Rail (HSR) and Link Union Station (LinkUS) Projects, through policies LU21.16 and LU21.17. The HSR Project would bring HSR service to Union Station. The HSR alignment would parallel existing and proposed Metrolink and Amtrak alignments in the Downtown Plan Area, which primarily run along the Los Angeles River, veering briefly west near the Men's Central Jail, and then briefly south to reach Union Station.

Currently, Union Station is a dead-end station where all commuter and inter-city trains enter and exit through a five-track "throat," or station entry, at the north end of the station, which results in idling times of 20 minutes or longer (Metro 2017). To address this issue and increase station capacity, the LinkUS Project would extend the tracks that currently dead-end at Union Station south over the US-101 freeway and then east above E. Commercial Street to merge back south with existing alignments along the Los Angeles River, as well as merge back north along existing alignments to loop back into Union Station. The tracks along E. Commercial Street would be above grade. The LinkUS project would also include an expanded passenger concourse that would connect with the Patsaouras Transit Plaza to the east and the historic Union Station to the west (Metro 2017).

Due to the proposed siting of these projects, they are not anticipated to contribute to the physical division of an existing community. The proposed LinkUS tracks would run along the northern boundary of an existing community (Little Tokyo) that is bounded by the US-101 to the north, before merging with existing tracks along the Los Angeles River. In addition, the LinkUS tracks would be located above-grade in the portion of the alignment along E. Commercial Street. The HSR would run along existing alignments and the proposed LinkUS alignment, and the passenger concourse is proposed to be built in an area currently used for transit infrastructure. In addition, these projects fall outside of the City's authority and will undergo environmental review by their respective lead agencies, the California High-Speed Rail Authority (HSR Project) and Metro (LinkUS).

While the Downtown Plan would accommodate an increase in residential density and development intensity, future development would occur in a manner that is consistent with existing neighborhood characteristics and would not physically divide an established community.

The Downtown Plan does not propose major transportation infrastructure that would physically divide the Downtown Plan Area and generally maintains and supports current land use development patterns, such as the continued transition of the Downtown Plan Area to a more mixed-use environment, which began with

the previous Community Plan updates. Proposed land uses would not involve physical barriers that would divide the community. Therefore, the Downtown Plan would have **no impact** related to the division of an established community.

New Zoning Code Impact

Land uses in the City are diverse and vary widely by community planning area and consist of residential, commercial, industrial, open space, and public facilities. The New Zoning Code does not propose any standards that could divide an established community.

The New Zoning Code would allow for a variety of new zone districts that could be applied elsewhere in the City through future community plan updates or amendments. In the more urbanized areas of the City, the New Zoning Code is unlikely to be applied through a community plan update or amendment in a way that would divide an established community as urbanized areas are already largely developed with a mix of uses and infrastructure. For less developed areas of the City, the New Zoning Code would include a range of Form Districts that could be applied in the planning process to transition from more intense to less intense areas, where there is a policy intent to do so.

The New Zoning Code includes Use Districts that can be applied in the planning process to allow for selected, new uses in some areas of the City. For example, a new Use District (Neighborhood Medium Residential Amenity) would allow for small restaurants, personal service, or other nonresidential uses in addition to residential uses. These nonresidential uses currently exist in neighborhoods throughout the City although they are considered legally non-conforming in many cases. By creating this new Use District, the City, through future community plan updates or amendments, could apply the New Zoning Code to describe and encode the existing character of the neighborhood, thereby avoiding dividing these established communities. The New Zoning Code could also allow new types of uses to be introduced to an area if such uses would meet the scale and policy intent of the Downtown Plan or amendment vision. However, the Proposed Project does not intend to implement the New Zoning Code outside of the Downtown Plan Area and therefore any indirect impacts from the future use of the New Zoning Code outside the Downtown Plan Area would be speculative. Since the New Zoning Code only applies to properties where a community plan is being updated or amended to utilize the new zoning, impacts related to the division of established communities would be analyzed pursuant to CEQA as part of the community plan update process. As a result, a **less than significant impact** would occur.

Mitigation Measures

Significant impacts related to the division of an established community have not been identified; therefore, mitigation is not required.

Threshold 4.10-2	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
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Impact 4.10-2	Downtown Plan: The Downtown Plan would generally be consistent with the overall intent of applicable land use policies, goals, strategies, and/or objectives, including those contained in the City of Los Angeles General Plan and SCAG's 2016-2040 RTP/SCS. Impacts related to the Downtown Plan would be less than significant .
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New Zoning Code: The New Zoning Code would generally be consistent with the overall intent of applicable land use policies, goals, strategies, and/or objectives, including those contained in the City of Los Angeles General Plan and SCAG's 2016-2040 RTP/SCS. The Proposed Project does not intend to implement the New Zoning Code outside of the Downtown Plan Area. Any indirect impacts from the use of the New Zoning Code would be speculative. Impacts Citywide would be *less than significant*.

Downtown Plan Impact

In addition to analyzing the threshold questions above, which is intended to focus on whether environmental impacts will result from the Downtown Plan conflicting with applicable plans, policies or regulations, the following evaluation is also intended to satisfy the requirements of Guidelines Section 15125(d) to identify any inconsistencies between the Proposed Project and the applicable general, specific or regional plans.

The Central City and Central City North Community Plans are two of the 35 Community Plans that collectively comprise the Land Use Element of the Los Angeles General Plan. Pursuant to State Planning Law, the policies and programs included in the Downtown Plan would need to be consistent with policies and programs included in other elements of the General Plan. **Table 4.10-3** provides a consistency analysis of the Downtown Plan with applicable policies contained in the General Plan that were adopted for the purpose of minimizing any environmental effect. General Plan Policies related to topics not considered under CEQA, such as economic policies, are not included.

As demonstrated in **Table 4.10-3**, the Downtown Plan would generally be consistent with policies contained in the City's General Plan. As identified in **Table 4.10-3** for Framework Element Policy, 3.14, the Downtown Plan may be in partial conflict with policies related to protection of industrial land, including 3.14.4. However, those policies were not adopted for the purpose of avoiding or mitigating an environmental effect, but instead for protecting jobs, which is a social economic impact. To the extent that the conflict resulted in a loss of industrial uses that were displaced, it would be highly speculative. There is little demand for new heavy industrial uses in this area of the City. Additionally, if existing uses moved, it is unclear where they would go as there are many areas in the Southern California region that can accommodate industrial uses, in and outside the City, such as the San Gabriel Valley and the Harbor Gateway Corridor. Displacement of uses can result in impacts to air, GHG or transportation if employee or work trips are longer or if it results in new construction and the new construction has impacts. However, without knowing a particular project, it would not be possible to determine whether such a displacement would result in impacts. Based on the above, any impact from a conflict of the Proposed Plan to Framework Element Policy 3.14 is less than significant.

Additionally, growth under the Downtown Plan is expected to generate air pollutant emissions exceeding SCAQMD significance thresholds, as discussed in Section 4.2, *Air Quality*, the Downtown Plan would facilitate infill, transit-oriented and mixed-use development, and improve public transit and infrastructure supporting active transport. As such, the project is designed to reduce vehicle trips to, from, and within the Downtown Plan Area, which would have a beneficial effect on air quality. Therefore, the Downtown Plan would be consistent overall with applicable policies and objectives contained in the City's General Plan.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
Framework Element (1995, 1996, 2001)	
Chapter 3. Land Use	
3.7 Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	Consistent The Downtown Plan includes the Villages and Neighborhood Medium Residential designations that specifically provide for the stability and enhancement of existing multifamily residential neighborhoods. As discussed in Section 4.17, <i>Utilities and Service Systems</i> , and Section 4.13, <i>Public Services</i> , the Downtown Plan Area would be served by sufficient public infrastructure and services. The Downtown Plan is intended to accommodate a substantial share of the City's growth because Downtown has the infrastructure and services that can support growth.
3.8 Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.	Consistent See response to Policy 3.7. Downtown is already characterized by a significant mix of uses that will be reinforced by the Downtown Plan. In addition, the Downtown Plan includes the Community Center and Traditional Core designations that would support the development of new neighborhood and community mixed uses in the Downtown Plan Area. These designations allow for the development of multi-unit residences and community-serving uses, as well as offices and entertainment uses.
3.11 Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.	Consistent The Downtown Plan supports the continuation and expansion of a variety of uses through its proposed General Plan designations. The Civic Public Facilities designation accommodates government uses, and these uses are permitted in additional proposed General Plan designations ; Transit Core and Traditional Core allow for a mix of uses, including entertainment and visitor-serving uses, as well as housing and business uses, at a higher density and scale reflective of a downtown area. The Village and Neighborhood Medium Residential designations accommodate residential and community-serving mixed use also at a higher density and scale; the Markets, Production, and Hybrid-Industrial designations accommodate industrial uses and a wide range of jobs.
3.12 Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.	Consistent The Villages designation maintains existing low-intensity commercial districts in the Downtown Plan Area, such as the Chinatown commercial district, Little Tokyo, and the Toy District.
3.14 Provide land and supporting services for the retention of existing and attraction of new industries.	Partially Consistent and Partially Inconsistent Land for industrial uses would be retained under the Downtown Plan, while allowing new residential uses in those areas planned for Hybrid Industrial and Markets designation. The Markets, Production and Hybrid Industrial designations are intended to provide space for, and support retention of, existing industries while encouraging attraction of new industries, as well as limited residential and commercial spaces. As described above under Methodology, the Production designation in the proposed Plan would reserve land for industrial and employment uses. The proposed Hybrid

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
	Industrial and Markets designations would continue to allow for industrial and manufacturing uses. The re-designation of industrial to Hybrid Industrial and Markets would allow for a greater variety of industrial, and employment uses such as office, heavy commercial, and light industrial, and limited residential uses would be permitted only when a minimum area is reserved for productive uses. In addition, the higher development potential permitted under the Downtown Plan will enable higher intensity of employment uses within these areas, while accommodating limited residential uses in proximity to job-generating uses. Allowing new residential uses would potentially be in conflict with Framework Element Policy 3.14.4 which encourages the City to “limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zone to uses which support the primary industrial function of the location in which they are located.” Additionally, it may be in conflict with the language in the Framework Element that calls to “preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City’s residents.” Accordingly, the Downtown Plan has recommended unique land use and zoning strategies that are aimed to ensure that new uses introduced into existing industrial areas bolster employment opportunities. Such strategies include requirements that new development set aside floor area within the project for uses that are currently allowed under present-day zoning and allow for job opportunities. Such uses include manufacturing, heavy commercial, and office uses, among others. In addition, the Downtown Plan proposes requirements for live/work residential uses, in lieu of traditional housing uses in certain portions of the CPA. Such live/work uses, as proposed, would be required to meet specific size, configuration, and employment occupational standards that do not apply to standard residential uses. Lastly, the Downtown Plan proposes substantial floor area incentives for development that provides an additional proportion of employment-related floor area, in addition to the base requirements described above.
3.15 Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.	Consistent The Downtown Plan Area is well served by public transit including regional rail service, many local and rapid bus lines, and the Metro Red, Purple, Gold, Blue, and Expo rail lines. Also, see responses to Policy 3.7, 3.12 and 4.2.
3.16 Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	Consistent See response to Policy 2.11 under the Health and Wellness Element. In addition, form district and frontage regulations would require development projects contribute to inviting streetscapes and pedestrian activity with requirements relating to building setbacks, ground floor transparency, and entrance spacing requirements.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
3.17 Maintain significant historic and architectural districts while allowing for the development of economically viable uses.	Consistent As discussed in Section 4.4, <i>Cultural Resources</i> , the Downtown Plan may result in significant and unavoidable impacts to individual historic resources. However, the Downtown Plan includes policies to protect historic resources, which would provide for the protection of such resources to the degree feasible such as: LU 12.1 Protect and support the rehabilitation of historic resources designated at the local, state, or national level. LU 12.2 Incentivize the preservation, rehabilitation, and adaptive reuse of one of the largest and most distinguished stock of historic buildings in the United States for a variety of uses. LU 12.3 Prevent the unnecessary loss of resources of historic significance, special character, cultural, or social significance. LU 14.1 Ensure that where new development occurs, it responds to and augments the physical qualities and distinct features of existing historic resources. LU 14.2 Retain the integrity of historic resources, while achieving a balance between preservation and the need to accommodate housing and jobs in Downtown. LU 14.3 Preserve and promote the distinct qualities and features of historically and culturally significant neighborhoods and communities. LU 14.5 Support efforts to preserve and restore the rich inventory of culturally significant murals and public art found throughout Downtown. LU 14.6 Encourage new development to incorporate culturally relevant and community-driven public art along building facades and in outdoor areas.
3.18 Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.	Consistent See responses to Policies 3.7 and 3.8.
Chapter 4. Housing	
4.1 Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs	Consistent The Downtown Plan would allow for the development of additional residences in the Downtown Area. The Plan also includes the Downtown Plan Community Benefits Program, which offers development incentives for residential buildings in exchange for providing affordable housing. In addition, the

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
by income level of the future population to the year 2010.	Plan includes policies to ensure that a variety of housing types are provided, such as: LU 3.1 Recognize additional housing unit options to accommodate a variety of household sizes, including larger households, such as those with children, multigenerational living, and special needs populations. LU 4.2 Find opportunities to create affordable housing options for middle income and workforce populations. LU 4.6 Incentivize the creation of housing options that are affordable to and occupied by low income households, especially housing at the deepest levels of affordability, near transit. As discussed in Section 4.12, <i>Population and Housing</i>, Downtown Plan development would meet and exceed projected housing needs of the future population.
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 developments and surrounding lower-density residential neighborhoods.	Consistent The entire Downtown Plan Area is well-served by existing and planned transit and many of the mixed-use development permitted would occur in high activity areas, such as in proximity to transit corridors and along major arterials. Unlike other areas of the City, where residences are typically buffered from higher-density development. Downtown Los Angeles is intended to accommodate the highest development densities in the City, as recognized in the GPF's "Downtown Center" designation. The Downtown Plan would support high-rise residential development in high-density areas of the Downtown area through General Plan designations such as Transit Core, and form districts that allow for high FAR and Height. Consistent with existing conditions, relatively lower-density residential neighborhoods would be supported primarily in the northeast areas of the Downtown Plan Area, which are currently buffered from the high-rises of Downtown by the mid- and low-rises of Downtown's civic core buildings. Existing low-scale areas would be preserved through General Plan designations such as Neighborhood Medium Residential and Villages, and form districts tailored for low to moderate scale buildings.
4.3 Conserve scale and character of residential neighborhoods.	Consistent As the urban core of Los Angeles, the Downtown Plan Area currently contains few fully residential neighborhoods. The Downtown Plan would preserve existing residential neighborhoods through the Villages and Neighborhood Medium Residential General Plan designations. In addition, as discussed under Threshold 4.10-1, the Downtown Plan would not divide an existing community and would include specific policies and Form and Frontage zoning regulations to retain the character of some of Downtown's iconic neighborhoods, including Chinatown, which remains a largely residential neighborhood with community-serving uses.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
4.4 Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.	Consistent The Downtown Plan would alter the existing General Plan land use designations and zoning in the Downtown Plan Area to allow for an increase in housing capacity and encourage production of new housing. As discussed in Section 4.12, <i>Population and Housing</i> , development facilitated by the Downtown Plan would increase the available stock of housing in the Downtown Plan Area by an estimated 100,000 units approximately.
Chapter 5. Urban Form and Neighborhood Design	
5.2 Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	Consistent The GPF “Downtown Center” designation recognizes the unique nature of Downtown Los Angeles as an area accommodating the highest development densities and serving as the principal transportation hub for the City and the region. The Downtown Plan General Plan designations and corresponding zoning reinforce these development patterns and increase the intensities in much of the Downtown Plan area and concentrates the greatest intensities in the most transit served areas of Downtown. This vision is incorporated into the project’s objectives, which include the following: “To concentrate development opportunity in Downtown’s most transit-served areas.” Transit-oriented development would be supported in the Downtown Plan through the Community Center designation, as well as the Transit Core designation, which allow for high-rise development in proximity to transit.
5.5 Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	Consistent The Downtown Plan includes a number of policies to improve the quality of the public realm and urban design, including policies to create public spaces for social connectedness (see the response to Health & Wellness Element Policy 2.2), policies to enhance public safety along streets and public spaces (see the response to Health & Wellness Element Policies 2.11 and 3.5), and creation of new public spaces (see the response to Health & Wellness Element Policy 3.2).
5.6 Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.	Consistent As described in the GFP, the City’s Downtown area is intended for high-density growth. Nevertheless, the Downtown Plan would conserve and reinforce the community character of existing neighborhoods and commercial districts through its General Plan designations and application of the proposed zones. The new zoning code classifications, discussed in greater detail in Chapter 3.0 <i>Project Description</i> Section 3.7.4, New Zoning Code, would consist of a number of components, including a form district and frontage module. The form district governs the allowable shape, size, height and placement of buildings, while the frontage module governs how a site or building addresses the street or right of way, such as through height, amount of transparency required, pedestrian entry requirements, and allowable building elements. In addition, the zoning code would include development standards that include regulations tailored to specific contexts, such as Downtown and Production. New zoning regulations would be applied with the adoption of the Downtown Plan to ensure that new development would be compatible with the existing context, such as having

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
	consistent street walls, building datum lines, and building frontage transparency. See Impact 4.10-1 for a discussion of policies contained in the Downtown Plan to support preservation of existing neighborhoods.
5.8 Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	Consistent As discussed above, the proposed zoning tools would govern the building forms and features of future development and would be utilized to establish strong pedestrian orientation throughout Downtown. These regulations include ground and upper story transparency, street-facing building entrances, and articulation methods to encourage safe and active streets. In addition, the Downtown Plan includes a number of policies to support the establishment of a pedestrian-oriented environment, such as those discussed in the responses to Health and Wellness Element Policies 2.2, 2.11, and 3.5.
5.9 Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent See the responses to Health and Wellness Element Policies 2.11 and 3.5.
Chapter 6. Resource Conservation and Development	
6.1 Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	Consistent The Downtown Plan Area is entirely urbanized and encompasses a major metropolitan center. The Downtown Plan would allow for greater growth and development in an urban environment, thus avoiding impacts to the City's remaining natural settings. In addition, the Downtown Plan includes policies to support the revitalization of the Los Angeles River as envisioned in the Los Angeles River Revitalization Master Plan (LARRMP), as discussed in the response to Health & Wellness Element Policy 3.3. The LARRMP proposes to enhance and create riparian habitat along the sides of the LA River, which could occur in the Downtown Plan Area. A long-term goal of the LARRMP is to restore the ecological and hydrological functioning of the river, through the creation of a riparian habitat corridor within the channel, and through the removal of concrete walls where feasible.
6.2 Maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.	Consistent The Downtown Plan includes policies to expand parks, enhance existing parks, and improve the safety of open spaces within the Plan Area, which would encourage greater use of the open space network. In addition, the Downtown Plan Area includes major transit hubs that currently or will in the future provide access to major community and regional open spaces; for example, the Expo line provides direct access to downtown Santa Monica, a short walk away from Santa Monica Beach.
6.4 Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.	Consistent The Downtown Plan includes policies to promote safety and the use of parks and open spaces, as well as policies to promote the identity of a riverfront community as discussed in the responses to Health and Wellness Element Policies 3.3 and 3.5.
Chapter 9. Infrastructure and Public Services	
9.5	Consistent

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.	Downtown Plan development would not occur in flood hazard areas, as discussed in Section 4.9, <i>Hydrology and Water Quality</i> .
9.6 Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	Consistent Downtown Plan policies, in combination with federal, state, and local requirements pertaining to stormwater runoff control, would reduce stormwater runoff and protect water quality. See Section 4.9, <i>Hydrology and Water Quality</i> , for a more detailed discussion.
9.7 Continue to develop and implement a management practices based stormwater program which maintains and improves water quality.	Consistent Downtown Plan Development would be required to comply with National Pollutant Discharge Elimination System (NPDES) permit requirements and the City's stormwater requirements. See Section 4.9, <i>Hydrology and Water Quality</i> , for a more detailed discussion.
9.9 Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.	Consistent See Section 4.9, <i>Hydrology and Water Quality</i> , Threshold 4.9-2, for a discussion of groundwater use as it relates to the Downtown Plan Area and Section 4.17, <i>Utilities and Service Systems</i> , for a discussion of water availability and Downtown Plan Area use. As discussed in these sections, LADWP plans to expand the City's water resources and will be able to meet future demand generated by development levels proposed by the Downtown Plan.
9.10 Ensure that water supply, storage, and delivery systems are adequate to support planned development.	Consistent See the response to Policy 9.9.
9.40 Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	Consistent Future development would be required to comply with energy efficiency lighting and light pollution reduction requirements included in the 2016 California Building Code, including the CALGreen Code, and the Los Angeles Building Code and Los Angeles Green Building Code (LAMC Chapter IX); the Los Angeles Building Code and Green Building Code largely incorporate and amend the 2013 California Building Code and CALGreen Code, respectively. For example, Subsection 99.05.106.8 of the Los Angeles Green Building Code sets restrictions on residential outdoor lighting, and Section 99.04.211.4 requires residences to be constructed with solar-ready features as specified in the California Energy Code. Lighting requirements and potential light pollution and glare impacts would be less than significant, as discussed in Section 4.1, <i>Aesthetics</i> .
Plan for a Healthy Los Angeles: Health and Wellness Element (2015)	
1.5 Plan for Health Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	Consistent Future development would be required to comply with use adjacency buffers regulated by zoning under the Development Standard Set. These buffers are required when industrial or heavy commercial Use Districts are adjacent to Use Districts allowing for residential uses. The Downtown Plan also incorporates numerous goals and policies to support healthy communities, such as policies promoting active transport through the development of walkable communities, expansion of bike and pedestrian networks, and improvement of safety, comfort, and aesthetics of the pedestrian environment. In addition, the Downtown

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
	Plan includes policies to support availability of healthier food, such as: LU 8.7 Support street vending and create vending districts to increase access to economic opportunity and healthy food and reinforce Downtown's active street life. LU 15.2 Promote public health and environmental sustainability outcomes consistent with the City's Plan for Healthy Los Angeles and the Sustainable City pLAn. LU 15.4 Facilitate access to affordable, fresh food for all Downtown residents and support community serving small businesses that sell affordable, fresh, and culturally relevant food
2.2 Healthy Building Design and Construction Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.	Consistent The Downtown Plan includes a number of policies to support the development of a pedestrian-oriented environment with universal accessibility, including: LU 17.5 Encourage trees and architectural elements that provide shade; cooling stations; and seating areas for pedestrians along primary corridors in Downtown. LU 15.6 Encourage sustainable building design and construction standards that can increase building energy and water efficiency. LU 10.3 Incentivize the inclusion of paseos through large sites to improve pedestrian access. LU 10.11 Line the ground floor of stand-alone garages with active uses and require that upper levels be screened to increase street life and pedestrian activity, and improve the aesthetic quality of buildings and neighborhoods LU 17.1 Promote a pedestrian environment that enhances thermal, visual, and audible comfort and provides opportunities for resting and socializing. In addition, the Downtown Plan would encourage redevelopment of sites with older structures that may contain hazardous building materials, such as asbestos, lead, and other contaminants. As discussed in Section 4.8, <i>Hazards & Hazardous Materials</i>, demolition of existing structures would be required to comply with federal, State and local regulations that would prevent hazardous levels of exposure during demolition. New construction would not have the same levels of hazardous materials, and as subject to existing hazard mitigation requirements, redevelopment would also contribute to a healthier built environment.
2.11 Foundation for Health Lay the foundation for healthy communities and healthy living by promoting infrastructure	Consistent See responses to Policies 1.5 and 2.2. In addition, the Downtown Plan includes policies to enhance safety for active

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.	transport and identifies areas to target for safety improvements, including: LU 10.6 Require that pedestrian bridges minimize visual impacts, be architecturally integrated into building design, and include maintenance and safety programs with connection to public entrances, lighting, and directional signage, and include maintenance and safety programs LU 29.14 Target San Pedro, 3rd, 4th, 5th, 6th, and 7th streets for improvements to increase safety, connectivity, and access for the Skid Row community.
3.2 Expand Parks Improve Angelenos' mental and physical health by striving to equitably increase their access to parks, increasing both their number and type throughout the city; prioritize implementation in the most park-poor areas of the city.	Consistent As discussed in Section 4.14, <i>Recreation</i>, Downtown Plan development would generate demand exceeding City standards for park land. However, developers of residential development projects in the Downtown Plan Area would be required to pay park impact fees, Quimby in-lieu fees, or dedicate land for parks, which would support the provision of new park facilities inside and outside the Downtown Plan Area. In addition, the Downtown Plan includes a zoning incentive system that allows developers to build at a higher FAR if their project includes public benefits, such as open space or community facilities. This would incentivize the creation of new open space areas and community amenities. The Downtown Plan includes policies that support the development of new parks, particularly in priority areas, and preservation of existing parks: LU 37.3 Expand the amount of open space resources with parks, paseos, parklets, and enhanced pedestrian amenities on public streets. SO (Streets and Open Space) 1.1 Find opportunities to create new parks and other open spaces through tools such as the transfer of development rights, public outdoor amenity space incentives, and non-traditional interventions in the public right-of-way, and as a part of major public projects. SO 1.2 Prioritize the development of public open space in underserved communities to improve access to open space. SO 1.7 Support the development of catalytic new parks and reinvestment into existing parks. Namely: ● Pershing Square ● Park 101 ● 6th Street Park ● A new large park in the Fashion District ● Gil Lindsey Plaza
3.3 Los Angeles River Continue to support the implementation of the Los Angeles River Revitalization Master Plan to create a continuous greenway of interconnected	Consistent The eastern boundary of the Downtown Plan Area abuts the channelized Los Angeles River. The area along the river is currently occupied primarily by railroad tracks, Union Station, and a variety of industrial uses. The Downtown Plan both

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
parks and amenities to extend open space and recreational opportunities.	preserves the existing industrial nature of the river-adjacent area and allows for mixed uses in the areas adjacent to the River with the Hybrid Industrial designation. The Downtown Plan also encourages greater connectivity to the River through pedestrian infrastructure improvements, the development of 4th, 6th, and 7th Streets, which provide River access, as primary east-west corridors. The Downtown Plan includes policies to encourage the development of a more public-facing riverfront community in its Streets and Open Space Chapter with SO Goal 9 and 10. Policies under these goals include: SO 8.4 Identify physical interventions, such as decking over rail lines that can improve connectivity and access to the River. SO 9.2 Activate space adjacent to the Los Angeles River with active and passive recreational amenities and access points to the River. SO 9.4 Support the recommendations of the Los Angeles River Design Guidebook. SO 10.1 Support the implementation of the Los Angeles River Revitalization Master Plan and the Los Angeles River Ecosystem Restoration Project.
3.5 Park Safety Encourage greater community use of existing parks and open spaces by improving safety and access in and around parks and open spaces by encouraging land use, design, and infrastructure improvements that promote healthy and safe community environments and park design, programming, and staff-levels that meet local community safety-needs.	Consistent The Downtown Plan includes a number of policies to improve safety and access throughout the Downtown Plan Area, such as those included under SO Goal 5, Public open space that is inviting and engaging for community gathering and recreation: SO 5.1 Develop design guidelines to promote alleys as shared, and multipurpose public spaces that are welcoming to a range of users. SO 5.2 Encourage the use of creative lighting, public art, and seating treatments. SO 5.4 Provide family-friendly activities and spaces, as well as programming for children, youth, and seniors. SO 5.5 Support walkability and safety with appropriate lighting, and legible wayfinding. As discussed in Section 4.14, <i>Recreation</i>, Downtown Plan residential development projects would be required to pay park impact fees, which would help support improvements to existing facilities. In addition, the Downtown Plan includes a zoning incentive system that allows developers to build at a higher FAR if their project includes public benefits, such as open space or community facilities. This would incentivize the creation of new open space areas and community amenities.
4.1	Consistent

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
Land for urban agriculture and healthy food Encourage and preserve land for urban agriculture in the city to ensure a long-term supply of locally produced healthy food, promote resiliency, green spaces, and healthy food access; increase the number of urban agriculture sites including but not limited to: community gardens, parkway gardens, urban farms and rooftop gardens in low-income and undeserved areas.	The Markets designation allows for a mix of uses, including urban agriculture. In addition, the Downtown Plan includes a zoning incentive system that allows developers to build at a higher FAR if their project includes open space or community facilities such as community gardens to improve access to healthy food options.
5.1 Air pollution and respiratory health Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.	Consistent Reasonably anticipated development under the Downtown Plan would generate emissions exceeding SCAQMD significance thresholds, as discussed in Section 4.2, <i>Air Quality</i>. However, growth is consistent with the RTP/SCS. In addition, as discussed in Section 4.15, <i>Transportation and Traffic</i>, VMT per service population that accounts for both residents and employee trips for the Downtown Plan would be less than or equal to the projections for the 2040 RTP/SCS, which would limit vehicular emissions and associated regional air quality impacts and contribute toward attainment of state and federal air quality standards. In addition, stationary and mobile sources in the Downtown Plan Area would be subject to local, state, and national regulations to reduce air pollutant emissions, including California's clean car standards (i.e., Pavley regulations), ARB diesel engine requirements, and SCAQMD rules and regulations. The Downtown Plan would also include policies to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health, such as the following: LU 15.1 Plan for sustainable land use patterns that leverage transit and open space resources and access to housing and jobs to improve the overall quality of the environment. LU 15.5 Encourage the use of native flora that maximizes the capture of pollutants near freeways and industrial facilities. LU 16.6 Prioritize infrastructure and landscape treatments that absorb pollutants and support stormwater infiltration. LU 16.7 Reduce the urban heat island effect by installing cool pavement and cool roofs throughout Downtown. LU 16.9 Support local, regional, state, and federal programs seeking to reduce greenhouse gas emissions, in an effort to minimize pollution sources and to improve air quality. LU 17.5 Encourage trees and architectural elements that provide shade; cooling stations; and seating areas for pedestrians along primary corridors in Downtown. In addition, the Downtown Plan supports reduced air pollution from mobile sources and improved respiratory health by

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
	supporting development of public transit, the development of residences and employment centers near transit, expanding and improving the safety of active transport infrastructure, and improving pedestrian and bike access to buildings. Relevant policies include those under Mobility and Connectivity (MC) Goal 1, A safe transportation system that accommodates the needs of all people; MC Goal 3, A safe and inviting pedestrian environment; and MC Goal 4, A safe and integrated bicycle network that provides access to transit and key destinations. Also see response to Policy 2.11.
5.2 People Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.	Consistent Land uses supported by the Downtown Plan include light industrial uses, such as research and development, clean technology, and light manufacturing, and limits heavy industrial uses typically associated with high levels of negative health impacts to the south portion of the Plan Area. In addition, the Downtown Plan does not allow heavy industrial uses where residential and live/work uses are permitted. Industrial uses would be generally concentrated together in the southern portion of the Downtown Plan Area where residential uses will be prohibited. This would reduce exposure of residents and workers not employed by industry to potential health impacts from industrial activities. The Downtown Plan also includes the following policy to reduce negative health impacts from industrial uses: The Downtown Plan Area is bounded by, and encompasses, portions of a number of freeways (I-10, U.S. 101, I-110). The Plan permits residential and commercial development in proximity to freeways. As discussed in Section 4.2, <i>Air Quality</i>, uses within 500 of freeways could be exposed to elevated levels of diesel particulate matter, but such projects would generally incorporate air filtration systems that achieve interior air quality that does not result in deleterious long-term health effects.
5.7 Land use planning for public health and GHG emission reduction Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors, and others susceptible to respiratory diseases.	Consistent See response to Policy 5.1.
7.2 Safe passages Continue to promote the development and implementation of comprehensive strategies that foster safe passages in neighborhoods with high crime and gang activity to ensure that all Angelenos can travel with confidence and without fear.	Consistent The Downtown Plan includes a number of policies to improve safety and access throughout the Downtown Plan Area, such as those included under SO Goal 5, Public open space that is inviting and engaging for community gathering and recreation: SO 5.1 Develop design guidelines to promote alleys as shared, and multipurpose public spaces that are welcoming to a range of users. SO 5.2 Encourage the use of creative lighting, public art, and seating treatments. SO 5.4

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
	Provide family-friendly activities and spaces, as well as programming for children, youth, and seniors SO 5.5 Support walkability and safety with appropriate lighting, and legible wayfinding.
Air Quality Element (1992)	
1.1 Reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	Consistent As discussed in Section 4.2, <i>Air Quality</i>, Downtown Plan development would generate emissions exceeding SCAQMD significance thresholds. However, growth under the Downtown Plan would be consistent with SCAG forecasts upon which the AQMP is based. In addition, the Downtown Plan Area includes a wide range of transportation options and consequently, as discussed in Section 4.15, <i>Transportation and Traffic</i>, vehicle miles traveled (VMT) per service population in the Downtown Plan Area are forecast to remain well below city and regional averages.
2.1 Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals	Consistent The Downtown Plan would reduce work trips by promoting development near major transit hubs, promoting development of residences near employment, improving and expanding pedestrian, bicycle, and transit facilities, and supporting complete communities with a mix of residences and community-serving uses. Therefore, the Downtown Plan would generally promote land use and development patterns that reduce vehicle trips, and would maximize and improve the link between land use and multi-modal transportation to encourage the use of a range of transit modes. In addition, as discussed in Section 4.15, <i>Transportation and Traffic</i>, service population VMT that also accounts for employment-related VMT for the Downtown Plan would be less than or equal to the projections for the 2040 RTP/SCS.
2.2 Increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles and incentives for high occupancy vehicles	Consistent The Downtown Plan promotes higher vehicle occupancy with the following policy: MC 7.4 Expand programs that offer access to carpools and vanpools for Downtown workers to reduce the commute mode share of single occupancy vehicles. As discussed in Section 4.15, <i>Transportation and Traffic</i>, the Downtown Plan would also enhance access to transit, through applying new land use and zoning regulations to encourage mixing and implementing transportation improvements within the framework established in MP 2035.
3.1 Increase the portion of work trips made by transit to levels that are consistent with the goals of the AQMP and Congestion Management Plan (CMP).	Consistent See the response to Policy 2.1.
3.2 Reduce vehicular traffic during peak periods.	Consistent See the response to Policy 2.1.
4.2 Reduce vehicle trips and vehicle miles traveled associated with land use patterns.	Consistent See the response to Policy 2.1.
4.3	Consistent Reasonably anticipated development from the Downtown Plan would primarily be residential, commercial, and light

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
Ensure that land use plans separate major sources of air pollution from sensitive receptors, such as schools, hospitals and parks.	industrial development that would not be a major source of air pollution. The Downtown Plan does not propose zoning that would permit development of heavy industrial uses in the Downtown Plan Area and concentrates production, wholesalers, and light industrial uses in the eastern and southern portions of the Downtown Plan Area. See the response to Health and Wellness Element Policy 5.2.
Conservation Element (2001)	
Archaeological and paleontological Protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.	Consistent As discussed in Section 4.4, <i>Cultural Resources</i> , with mitigation, Downtown Plan development would not result in significant impacts to archaeological and paleontological resources.
Cultural and historical Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.	Consistent Future development under the Downtown Plan could potentially result in modifications to or loss of historic resources due to their ubiquity in the Downtown Plan Area, as discussed in Section 4.4, <i>Cultural Resources</i> , under Impact 4.4-1. However, the Downtown Plan includes various policies to protect the area's important cultural and historical sites, as discussed in the response to Framework Element Policy 3.17. In addition, implementation of the Downtown Plan would incorporate Mitigation Measures 4.4-1, 4.4-2, and 4.4-3, which would require future development projects to take steps to identify, protect, and/or document historical, archaeological, and paleontological resources that would be impacted by the project.
Land form and scenic vistas Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	Consistent As discussed in Section 4.1, <i>Aesthetics</i> , Impact 4.1-1, the Downtown Plan Area is already urbanized and lacks major identified scenic resources. Impacts to land forms and scenic vistas from Downtown Plan development would be less than significant.
Housing Element (2013)	
2.2 Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.	Consistent See the responses to Framework Element Policies 3.8, 4.1, 4.2, and 5.2.
2.3 Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.	Consistent Downtown Plan development would be required to comply with the Los Angeles Green Building Code, which largely incorporates and amends the 2013 CALGreen Code, and also 2016 CALGreen Code requirements, which include standards to enhance energy efficiency and resource conservation. The Downtown Plan would also include policies to promote sustainable buildings, such as the following: LU 15.6 Encourage sustainable building design and construction standards that can increase building energy and water efficiency. Also see the responses to GPF policies 6.1 and 9.40.
2.4 Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.	Consistent See the responses to Framework Element Policies 3.8, 4.1, 4.2, and 5.2, and the discussion under Impact 4.10-1.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
Noise Element (1999)	
3 Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.	Consistent Future development in the Downtown Plan Area would be required to reduce noise impacts in accordance with the City's Noise Ordinance and incorporate mitigation provided in Section 4.11, <i>Noise</i> , as applicable.
Open Space Element (1973)	
The provision of malls, plazas, green areas, etc., in structures or building complexes and the preservation and provision of parks shall be encouraged.	Consistent See the response to Health and Wellness Element Policy 3.2 regarding the provision of parks. In addition, the Downtown Plan includes a zoning incentive system that allows developers to build at a higher FAR if their project includes public benefits, such as open space or community facilities. This would incentivize the creation of new open space and parks. The Downtown Plan includes numerous policies to encourage the provision of plazas, green areas, and other open spaces, such as: LU 4.3 Promote shared on-site amenities, including usable open space in new development projects. LU 21.6 Encourage new developments to contribute to the pedestrian and open space network with publicly-accessible plazas and paseos. Design these spaces with appropriate shading and landscaping. SO 4.4 Promote green spaces as inviting urban streetscapes that attract and serve all those who visit, live, and work Downtown.
Service Systems Element/ Public Recreation Plan	
Recreational facilities and services should be provided for all segments of the population on the basis of present and future projected needs, the local recreational standards, and the City's ability to finance.	Consistent See the response to Health and Wellness Element Policy 3.2.
Mobility Element – Mobility Plan 2035 (2016)	
Chapter 3: Access for All Angelenos	
3.1 Access for All Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.	Consistent The Downtown Plan would support transit-oriented development and includes a number of policies to support all modes of travel, as well as goods movement. <i>Pedestrian Mode</i> See the responses to Health and Wellness Policy 2.11 <i>Bicycle</i> MC 4.1 Promote the development of protected bicycle facilities, with dedicated signals, along key corridors to improve safety, comfort, and access for cyclists of all abilities.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN

Objective	Downtown Plan Consistency
	MC 4.2 Encourage residential and office buildings to provide bicycle related amenities such as repair stations and showers to facilitate cycling for residents, workers, and visitors. MC 4.3 Support the expansion of bike share throughout Downtown and adjacent areas, especially as a means to connect areas that are less served by transit. MC 4.4 Facilitate the integration of bikes on transit to improve first-last mile connections. MC 4.5 Identify gaps in bicycle facilities and prioritize network completion to achieve significant gains in bicycle mode share. <i>Public Transit</i> LU 21.2 Foster and reinforce a cohesive, pedestrian-friendly, and inviting streetscapes that promote walking, bicycling, and transit use. Encourage the creative infill of landscaped setbacks and inoperative spaces, such as those resulting from inconsistent streetwalls. LU 21.3 Pursue the implementation of a legible and consistent wayfinding system that guides pedestrians to destinations of interest and transit portals, such as Metro Stations. LU 21.12 Facilitate efforts to improve transit operations at the Pico Station through signal priority for transit vehicles and grade separation of transit facilities. LU 21.16 Advance efforts to plan for the future integration of high speed rail and other transit projects, such as the West Santa Ana Branch line and Link US, to reinforce Union Station and Downtown as the hub of regional transit. LU 21.17 Support the implementation of the ConnectUS Action Plan to improve pedestrian and cyclist linkages between Union Station and surrounding districts. <i>Goods Movement</i> LU 47.1 Prioritize space for jobs by preserving existing industrial functions, allowing production sectors to cluster, and facilitating goods movement with access to freeways and transportation corridors. LU 48.2 Guide the development of structures that are oriented and conducive to goods movement and new industry, while balancing pedestrian needs, and supporting transit use.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
3.2 People with Disabilities Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent The Downtown Plan includes the following policy to acknowledge the needs of people with disabilities: MC 1.1 Implement physical improvements and education programs to ensure safe access throughout Downtown's districts for users of all ages and abilities. SO 7.3 Maintain safety for all users, with appropriate traffic control infrastructure and ADA accessibility.
3.3 Land Use Access and Mix Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent The proposed Downtown Plan designations support mixed uses throughout almost the entirety of the Downtown Plan Area providing greater proximity and access to jobs, destinations, and neighborhood services. As discussed in Section 4.15, <i>Transportation and Traffic</i> , VMT per service population in the Downtown Plan Area are forecast to remain below City and regional averages.
3.4 Transit Services Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	Consistent The Downtown Plan Area is well-served by existing and planned public transit. The Downtown Plan includes policies that support further transit improvements as discussed under Impact 4.10-1.
3.5 Multi-Modal Features Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders	Consistent The Downtown Plan supports first-mile, last mile solutions through its Community Center and Transit Core designations, which promote mixed-use development near transit areas, as well as policies supporting active transport and transit (see the response to Policy 3.1).
3.6 Regional Transportation & Union Station Continue to promote Union Station as the major regional transportation hub linking Amtrak, Metrolink, Metro Rail, and high-speed rail service.	Consistent Policies in the Downtown Plan addressing Union Station include the following: LU 21.15 Encourage a mix of uses that intensifies and activates Union Station and surrounding neighborhoods. LU 21.16 Advance efforts to plan for the future integration of high speed rail and other transit projects, such as the West Santa Ana Branch line and Link US, to reinforce Union Station and Downtown as the hub of regional transit. LU 21.17 Support the implementation of the ConnectUS Action Plan to improve pedestrian and cyclist linkages between Union Station and surrounding districts.
3.7 Regional Transit Connections Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.	Consistent See the responses to Policies 3.4 and 3.6.
Chapter 5: Clean Environments & Healthy Communities	
5.1 Sustainable Transportation Encourage the development of a sustainable transportation system that promotes environmental and public health.	Consistent The Downtown Plan supports development of active and alternative modes of transport. See the response to Policy 3.1.

TABLE 4.10-3 CONSISTENCY ANALYSIS WITH THE CITY OF LOS ANGELES GENERAL PLAN	
Objective	Downtown Plan Consistency
5.2 Vehicle Miles Traveled (VMT) Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent The Downtown Plan Area includes a variety of transportation options and reasonably anticipated development from the Downtown Plan would include a mix of uses that supports the use of alternative transportation modes, such as transit, walking, and bicycling. As discussed in Section 4.15, <i>Transportation and Traffic</i> , vehicle miles traveled (VMT) per service population in the Downtown Plan Area are forecast to remain well below city and regional averages.
5.5 Green Streets Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	Consistent The Downtown Plan includes policies to support capture and infiltration of stormwater, such as: LU 15.3 Create a network of public and private green infrastructure by incentivizing the use of trees, eco roofs, vertical gardens, stormwater facilities, and landscaped amenity areas. LU 16.5 Support Citywide water use reduction goals by focusing on water management practices, and stormwater capture and treatment in Downtown that can increase local water supply. LU 16.6 Prioritize infrastructure and landscape treatments that absorb pollutants and support stormwater infiltration. LU 17.2 Maintain and expand the tree canopy to provide shade, improve air and water quality, reduce heat-island effect, and create habitat for birds and pollinators. SO 6.1 Require sustainable best practices relating to pollution reduction, stormwater management, heat reduction, and material recycling.

Los Angeles is a SCAG member and subject to SCAG's current regional transportation and land use planning strategies and goals for Southern California, which are established in the 2016-2040 RTP/SCS. **Table 4.10-4** provides a consistency analysis of the Downtown Plan with applicable goals contained in the 2016-2040 RTP/SCS. The Downtown Plan would be consistent with applicable actions and strategies contained in SCAG's 2016-20140 RTP/SCS

TABLE 4.10-4 CONSISTENCY ANALYSIS WITH THE SCAG 2016-2040 RTP/SCS	
Actions/Strategies	Downtown Plan Consistency
Land Use Focus new growth around transit The 2016 RTP/SCS land use pattern reinforces the trend of focusing growth in the region's High Quality Transit Areas (HQTAs). Concentrating housing and transit in conjunction concentrates roadway repair investments, leverages transit and active transportation investments, reduces regional life cycle infrastructure costs, improves accessibility, avoids greenfield development, and has the potential to improve public health and housing affordability. HQTAs provide households	Consistent The Downtown Plan would concentrate future growth in areas well-served by transit, including bus lines, light rail, heavy rail, and regional rail. See the response to Framework Element Policy 5.2. As discussed in Section 4.15, <i>Transportation and Traffic</i> , VMT per service population in the Downtown Plan Area are forecast to remain below City and regional averages.

TABLE 4.10-4 CONSISTENCY ANALYSIS WITH THE SCAG 2016-2040 RTP/SCS

Actions/Strategies	Downtown Plan Consistency
with alternative modes of transport that can reduce VMT and GHG emissions.	
Provide more options for short trips 38 percent of all trips in the SCAG region are less than three miles. The 2016 RTP/SCS provides two strategies to promote the use of active transport for short trips. Neighborhood Mobility Areas are meant to reduce short trips in a suburban setting, while “complete communities” support the creation of mixed-use districts in strategic growth areas and are applicable to an urban setting.	Consistent See the response to Mobility Element Policy 3.5.
Transportation	
Preserve our existing transit system Ensuring that the existing transportation system is operating efficiently is critical for the success of HQTAs, Livable Corridors, and other land use strategies outlined in the 2016 RTP/SCS.	Consistent As discussed in Section 4.15, <i>Transportation and Traffic</i> , the Downtown Plan would enhance access to all modes in the local circulation system, improving access on transit, roadways, bicycle and pedestrian facilities. This is accomplished through applying new land use and zoning regulations to encourage mixing and scales of use as well as site design supportive of all modes. In addition, the types of transportation improvements envisioned as part of the Downtown Plan are within the framework established in MP 2035.
Transit Initiatives	
Improve accessibility and connectivity This strategy includes establishing rail connections to our region’s airports, and improving transit, bicycling and walking accessibility and connectivity to rail stations.	Consistent As discussed in the responses to Health & Wellness Element Policies 1.5, 2.2, and 2.11, the Downtown Plan includes policies to support improvements to transit, bicycling and pedestrian facilities and enhance safety for active transport. As discussed in the response to Mobility Element Policy 3.5, the Downtown Plan also supports transit-oriented development through its proposed General Plan designations.
Active transport Strategies for achieving active transport include transit integration strategies-incorporation of first/last mile (to transit) strategies, livable corridors, and bike share services; short trip strategies-enhanced sidewalk quality, local bikeway networks, and neighborhood mobility areas; and education/encouragement strategies, including safe routes to schools.	Consistent As discussed in the response to Health & Wellness Element Policy 2.11 and Mobility Element Policy 3.5, the Downtown Plan includes policies to support improvements to transit, bicycling and pedestrian facilities and enhance safety for active transport, and would establish General Plan designations that facilitate transit-oriented development. In addition, the Downtown Plan includes the following policy to support safe routes to schools: MC 1.5 Facilitate the development of Safe Routes to School programs to ensure safe, multimodal access to Downtown schools.
Support complete streets opportunities where feasible and practical.	Consistent The Downtown Plan would support the creation of streets that provide safe mobility for all users. As delineated in the response to Mobility Element Policy 3.1, the Downtown Plan would include policies to enhance safety and access for pedestrians and bicyclists and promote bicycle and transit use.

Specific Plans and Other Plans/Standards

As discussed in the Regulatory Setting, a number of specific plans and other plans apply to portions of the Downtown Plan Area. These include:

- Los Angeles Sports and Entertainment District (LASED) Specific Plan
- Bunker Hill Specific Plan
- Alameda District Specific Plan
- Cornfield Arroyo Specific Plan
- Downtown Design Guide
- Greater Downtown Housing Incentive Area
- River Improvement Overlay (RIO) District
- Broadway Theater and Entertainment Design Guide Community Design Overlay (CDO)
- Historic Broadway Sign Supplemental Use District (SUD)
- Downtown Street Standards
- Little Tokyo Community Design Overlay (CDO)

The LASED Specific Plan Area consists of five blocks surrounding the Staples Center along its north and east sides. The Specific Plan provides regulations and incentives to support the development of the Specific Plan Area as a major entertainment/ mixed-use area with primarily hotel, retail, entertainment, and residential uses and has the goal of enhancing the existing Convention Center and Staples Center environs. The Downtown Plan includes minor amendments to address consistency with the New Zoning Code as to form, numeration, cross-references and implementation. The Transit Core designation of the Downtown Plan would accommodate the types of uses and intensities envisioned in the Specific Plan, thus furthering the Specific Plan goal of enhancing the area around the Convention Center and Staples Center.

The Bunker Hill Specific Plan Area is bounded generally by the 110 Freeway to the west, Fifth Street to the south, Hill Street to the east, and First Street to the north. The Specific Plan provides a regulatory framework to support development of the Bunker Hill neighborhood into a 24-hour downtown environment with a mix of commercial, retail, residential, and cultural spaces. The Bunker Hill Specific Plan will be repealed as part of the Proposed Downtown Plan. The purpose and provisions of the Bunker Hill Specific Plan will be implemented through the New Zoning Code provisions. The Transit Core designation of the Downtown Plan would accommodate the types of uses and intensities envisioned in the Specific Plan, thus furthering Specific Plan goals.

The Alameda District Specific Plan Area includes Union Station and the associated Terminal Annex area and is generally bounded to the south by U.S. 101, to the west by Alameda Street, and to the north and east by Vignes Street. The Specific Plan provides a regulatory framework to support the development of the area as a major transit hub for the region with adjacent mixed-uses. The Transit Core designation of the Downtown Plan would accommodate the transit hub envisioned in the Specific Plan, thus furthering Specific Plan goals.

The Cornfield Arroyo Specific Plan Area encompasses the northeast corner of the Downtown Plan Area south and east of the train tracks that run parallel to Broadway, west of the Los Angeles River, and north of College Street, Alhambra Avenue, and Bolero Lane. The Specific Plan established four new zoning districts, zoning standards, and additional requirements for an industrialized area. The four zones introduced by the Specific Plan—Urban Center, Urban Innovation, Urban Village Zone, and Greenway—support a wide variety of uses, including light industrial and manufacturing uses, urban agriculture, multi-family

residences, public facilities, social and environmental organizations, religious institutions, and schools. The Hybrid Industrial designation of the Downtown Plan would accommodate the mix of uses envisioned in the Specific Plan.

The Downtown Design Guide (DDG) provides urban design standards and guidelines for new construction (including additions) in the following Downtown neighborhoods: Convention Center, South Park, City Markets, Historic Downtown, Financial Core, Little Tokyo, Civic Center South, Bunker Hill, and Civic Center. Topics addressed in the Guide include sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing, on-site open space, architectural detail, streetscapes, and signage. As discussed in the Chapter 3, Project Description, the DDG would be updated to reflect standards and guidelines in these existing documents that would now be regulated through the New Zoning Code. Content within the existing Design Guide that is redundant to proposed New Zoning Code provisions, such as Form District, Frontage, or Development Standards, is proposed to be removed. The Design Guide will include additional content that would provide best practices that are responsive to specific neighborhood character. These neighborhood best practices will serve as an informational resource for new infill development to reinforce the unique identity of these neighborhoods and complement existing built patterns. The Downtown Plan incorporates the concepts contained in the current DDG and updates it to better complement proposed zoning regulations with an intent to help create a cohesive, pedestrian and transit friendly community while reinforcing the unique identity of neighborhoods. Thus, it would further the goals of DDG.

Ordinance 179,076 established the Greater Downtown Housing Incentive (GDHI) Area in 2007, providing a range of incentives to develop affordable housing in those portions of the Central City and Southeast Community Plan Areas generally bounded by U.S. 101 to the north, the 110 Freeway and Figueroa Street (south of Adams Boulevard) on the west, Alameda and Grand Avenue (south of 21st Street) to the east, and Washington Boulevard and Martin Luther King, Jr. Boulevard (west of Broadway) to the south. Specific bonuses include increased allowable floor area, reductions in required open space, and reductions in required parking for projects that include minimum affordable housing set-asides. The GDHI applies for only a portion of the Downtown Plan Area.

The Downtown Plan includes the new Downtown Community Benefits Program designed to promote the provision of affordable housing and will apply to the entirety of the Plan Area. The GDHI ordinance will be amended to exclude the Downtown Plan Area. However, the Downtown Community Benefits Program will further the intent of GDHI by expanding affordable housing incentives for all of the Downtown Plan Area.

The RIO District (Ordinance Nos. 18314 and 183145) is intended to help implement the vision and goals of the Los Angeles River Restoration Master Plan (LARRMP) by establishing additional requirements for properties along the riverfront or near the riverfront. These primarily include requirements pertaining to landscaping, fencing, exterior lighting, and ADA accessibility that serve to build a riverfront community and make the riverfront area a more welcoming environment to pedestrians and cyclists. Within the Downtown Plan Area, the RIO District includes all of the Central City North Community Plan Area south of Cesar E. Chavez and the area east of N. Spring Street and north of Cesar E. Chavez. Applicable development regulations and measures to protect sensitive biological resources in the RIO will be incorporated into Frontage Districts and development standard rules of the New Zoning Code. In addition, the RIO will be amended to remove portions that are currently in the Downtown Plan Area to avoid redundancy with the New Zoning Code provisions. The Downtown Plan would accommodate a range of uses in the vicinity of the RIO District and includes zoning regulations that are generally consistent with those of the LARRMP. The Downtown Plan would thus further the goal of building a riverfront community.

The Broadway CDO applies to Broadway between 1st Street and 12th Street in the Central City Community Plan Area. The Broadway CDO encourages the rehabilitation of existing building and guides the design and development of new buildings. Regulations include guidance for building setbacks, form, roof lines,

building articulations, storefront and window transparency, facade materials, and lighting. The Traditional Core designation of the Downtown Plan similarly encourages rehabilitation of existing buildings and includes design standards that maintain the current character of this area. Some of the standards and guidelines in the existing Broadway CDO would now be regulated through the New Zoning Code. The Broadway CDO will be amended to remove content that is redundant to proposed New Zoning Code provisions, such as Form District, Frontage, or Development Standards. The Broadway Streetscape Master Plan applies to properties fronting Broadway from First Street and Twelfth Street. The Master Plan was established to create a multi-modal, pedestrian focused street that can support and revitalize the historic theater district. The Streetscape guidelines call for expanded sidewalks with street elements and limited landscaping to enhance pedestrian interest and activity along the street. The Traditional Core designation would maintain the character of Broadway while Downtown Plan design standards would implement the ideas contained in the Streetscape guidelines.

The Broadway SUD applies to Broadway from First Street to Twelfth Street, encompassing the Broadway Theater and Entertainment District and parcels front along intersecting streets. It includes standards for the design, placement, and orientation of signs along Broadway, providing guidance for sign types that are currently on Broadway. The Sign District includes an incentive program to spur building activity, revitalization, and to fund streetscape improvements. Again, the Traditional Core designation includes standards that are generally consistent with those of the Broadway SUD.

The Downtown Street Standards apply throughout the Central City Community Plan Area, establishing a street hierarchy and guidance to balance traffic flow, pedestrian walkability, bicycle routes, and access to create more context-sensitive, complete streets in Downtown. The mobility components of the Downtown Plan are consistent with these standards as they are specifically aimed at enhancing walking, bicycling, and transit opportunities through, among other things, the creation of complete streets.

The Little Tokyo CDO applies to a portion of the Little Tokyo community, establishing design and development guidelines to promote a pedestrian-friendly environment and enhance the physical appearance of the area, with a focus on reinforcing the cultural and historic aspects of the neighborhood through a set of Design Guidelines. The Villages designation of the Downtown Plan would accommodate land uses and development standards that would be consistent with the Design Guidelines and are aimed at preserving and reinforcing the cultural and historic character of Little Tokyo. Similar to the Broadway CDO, standards and guidelines in the Little Tokyo CDO would now be regulated through the New Zoning Code. Thus, the Downtown Plan would further the goals of the little Tokyo CDO.

Redevelopment Plans

The Downtown Plan Area contains three active redevelopment plans that were formerly managed by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). In 2012, with the passage of AB 1x-26 by the California Legislature, the CRA/LA was abolished but the City's redevelopment plans continue to exist until they expire under their own terms. Since the dissolution of the CRA/LA, activities in the redevelopment project areas have been administered through the Designated Local Authority (DLA). The active redevelopment plans within the Downtown Plan Area are:

- Redevelopment Plan for the Chinatown Redevelopment Project Area (Chinatown Redevelopment Plan): The Chinatown Redevelopment Plan includes policies for neighborhood revitalization and to guide new development to meet the needs of the community, promote housing for various age, income and ethnic groups, encourage the diversification of the Chinatown commercial base to promote its economic wellbeing and to increase employment opportunities, develop an industrial environment that is compatible with adjacent land uses, preserve historic monuments and landmarks and enhance the distinctive character and identity of the community. The Redevelopment Plan will sunset in January 2022.

- The proposed Downtown Plan has similar goals and policies for the Chinatown Redevelopment Plan area. The Downtown Plan would generally increase the development potential of commercial uses in exchange for public benefits in the Chinatown Redevelopment Plan, including neighborhood-serving uses that are subject to area limitations as well as commercial uses such as entertainment, institutional and limited light industrial uses. This would encourage a wide variety of commercial uses and thereby strengthen the economic and employment base of the community. The Downtown Plan also includes policies to facilitate housing that is accessible to all income levels and ages and reinforce the historic and cultural identity of Chinatown. Therefore, the Downtown Plan would be generally consistent with the overall goals and policies of the Chinatown Redevelopment Plan.
- Redevelopment Plan for the Central Industrial Redevelopment Project Area (Central Industrial Redevelopment Plan): The Central Industrial Redevelopment Plan aims to eliminate and prevent the spread of blight and deterioration. Other main objectives of the plan is to encourage a healthy industrial environment that generates job opportunities and tax revenues; provision of a sound housing stock appropriate for all income levels, including artists-in-residence and live-work residents; provision of community services to meet the needs of stakeholders of the plan area and maintenance of a thriving commercial environment to serve businesses, employees, residents and visitors. The Redevelopment Plan will sunset in November, 2033.
- The policies, goals and zoning designations in the Downtown Plan for the Central Industrial Redevelopment Plan area are generally consistent with the goals and policies identified in the Central Industrial Redevelopment Plan. The Downtown Plan includes Hybrid Industrial districts, designed to promote productive industries and entrepreneurial activities and allows for a range of light industrial, office and commercial uses in addition to live/work units. The Plan reserves a significant portion of the Plan Area south of the I-10 for industrial and employment activities.
- Redevelopment Plan for the City Center Redevelopment Project Area (City Center Redevelopment Plan): City Center Redevelopment Plan provides policies to eliminate and prevent the spread of blight and deterioration, create an environment that will allow the Central City to accept its share of regional growth and development. The plan also includes policies to promote the development and rehabilitation of economic enterprises that are intended to provide employment and improve the area's tax base, and a full range of round-the clock activities and uses, such as recreation, sports, entertainment and housing. The Redevelopment Plan will sunset in May, 2033.
- The Downtown Plan allows for a wide mix of land uses in this Redevelopment Plan area to promote a range of employment opportunities, which generally align with the types of uses allowed under the City Center Redevelopment Plan. The Plan allows for the development of office, retail, entertainment and residential uses to facilitate growth in proximity to transit and expand the mix of uses and hours of activity and reinforce Downtown as the primary center of urban activity in the Southern California region.

Based on the above, the Downtown Plan would be generally consistent with the overall goals and policies of the three Redevelopment Plans. However, the Downtown Plan differs with the above Redevelopment Plan in terms of 1) land use regulations and 2) project review and approval procedures. Although the broad goals and policies between the Redevelopment Plans and the Downtown Plan are similar, certain regulations and procedures in the Redevelopment Plans are inconsistent or conflict with goals, objectives, and policies of the Downtown Plan:

1) Land Use Regulations

The Redevelopment Plans have regulations and numerical caps on floor area ratio, building height, and types of land uses that are not consistent with the Downtown Plan. These types of limits would deter the implementation of the Downtown Plan and incentives for affordable housing, which would allow

for more housing development, including affordable units in the Redevelopment Plan Areas than envisioned by the Redevelopment Plans. For certain properties, the maximum floor area ratio allowed under the Redevelopment Plans would be less than what the Downtown Plan would permit, impeding the implementation of the Downtown Plan's policies and goals, including ones that promote housing and jobs near transit.

For example, the City Center Redevelopment Plan limits FAR to a maximum of 6:1 in the Historic Downtown Area and the South Park Area, north of Pico, and a maximum of 3:1 in South Park Area, south of Pico, although maximum floor area ratios may be exceeded through Transfer of Floor Area Ratio. The maximum allowable FAR generally ranges from 10:1 to 13:1 for these areas in the Downtown Plan. The primary objective of the Downtown Plan is to accommodate employment, housing, and population growth projections forecasted through the planning horizon year of 2040 to ensure that the Downtown continues to grow in a sustainable, equitable, healthy, and inclusive manner, and implement policies of the City of Los Angeles General Plan Framework Element, by focusing new job-generating uses and residential development around transit stations. The caps on development in the Redevelopment Plans would not allow for full implementation of the policies and goals of the Downtown Plan for meeting growth consistent with the Framework Element and the 2016-2040 RTP/SCS.

The requirements related to FAR programs and reporting in the three Redevelopment Plans are inconsistent with the project objectives, goals, and policies of the Downtown Plan and updated implementation programs (see Appendix C, Chapter 5.0 *Implementation*). The Downtown Plan includes modernized and improved zoning tools to address scale and design in multiple formats that include regulations on building heights, ground floor ceiling height, transparency, open space, parking, character frontage requirements and vehicular access to address pedestrian orientation, historic preservation, and open space. In addition, there are implementation tools such as the Downtown Design Guidelines to promote best practices in the design of buildings and the public realm.

As such, the Downtown Plan includes requirements and programs that the City finds are better able to meet the goals and policies of the Framework Element and the 2016-2040 RTP/SCS and the underlying purpose of the Proposed Project than those in the Redevelopment Plans. The regulations and caps in the Redevelopment Plans that would conflict with the policies, objectives, goals, and express allowed zoning in the Downtown Plan are in conflict with the Downtown Plan.

2) Project Review and Approval Procedures

Both the Redevelopment Plan and the Los Angeles Municipal Code have procedures for review and approval of proposed developments. However, the Redevelopment Plan generally has additional project review and approval procedures that would not be needed with the implementation of the Downtown Plan and the extra process involved may hinder the creation of additional housing units and jobs needed to meet existing demand and anticipated growth. In several instances, the Redevelopment Plan requires the CRA to approve a development or participation agreement for uses that the Downtown Plan would allow through the proposed zoning or other existing zoning regulations, which could cause unnecessary hardships inconsistent with the purpose and intent of the Downtown Plan.

For example, the Downtown Plan allows for residential units on certain Commercial-Mixed Use zoning designations such as the Commercial-Mixed Community 1 (XC1) (CX1) in the Chinatown Redevelopment Project Area. LAMC also permits housing units on lots with commercial zones. Although the Chinatown Redevelopment Plan allows for residential uses within commercial areas, the project applicant must meet design and location criteria in addition to any other conditions specified by the CRA, which would require such developments to secure a development or participation agreements from the CRA. Another example is that the Downtown Plan allows for restaurants and retail of a certain

size in selected industrial areas such as Industrial Restricted 1 (MR1) and Industrial Heavy 1 (MH1) to generally support industry patrons and employees who work in the area; the Central Industrial Redevelopment Plan could permit commercial uses in these industrial areas but not without meeting the criteria as determined by the CRA.

Such requirements for the Redevelopment Plans would lead to additional review processes that could delay or present obstacles to the implementation of the Downtown Plan, which would otherwise explicitly permit such uses through the zoning. In addition, the dissolution of the CRA/LA has hampered the CRA's authorities to enter into agreements and significantly reduced its administrative resources. As such, the Redevelopment Plan is in conflict with the goals and policies of the Downtown Plan.

The Downtown Plan does not support carrying forward the requirements in the three Redevelopment Plans that are in conflict with the Downtown Plan. For example, the Downtown Plan will be implemented in accordance with the FAR limitations identified in the Plan, instead of the caps in the Redevelopment Plans. This may arguably result in the Downtown Plan conflicting with the Redevelopment Plans, with the Downtown Plan allowing more residential units than contemplated by the Redevelopment Plans. However, under the terms of the Central Industrial and City Center Redevelopment Plans, the City's plans and zoning are intended to control in any conflict between the two, and as such, as a legal matter there cannot be a conflict between these two Redevelopment Plans and the Downtown Plan in relation to land use plans or zoning requirements (See Section 502 of the Central Industrial and City Center Redevelopment Plans).

Section 502 of the Central Industrial and City Center Redevelopment Plans states that the land uses permitted in their respective Project Areas shall be those permitted by the General Plan, applicable Community Plan, and any applicable City zoning ordinance, as they existed when the Redevelopment Plans were adopted or as thereafter amended or supplemented. Therefore, the land use designations and zoning ordinances of the Downtown Plan would supersede the policies and provisions of the Central Industrial and City Center Redevelopment Plans that are inconsistent with the Downtown Plan.

The Chinatown Redevelopment Plan does not explicitly state the language of Section 502, included in the Central Industrial and City Center Redevelopment Plans. Nevertheless, even if the Downtown Plan were found to conflict with any substantive or procedural land use requirements in any of the Redevelopment Plans, that do or do not include the language in Section 502 discussed above, there would be no significant impact from that conflict that is not otherwise identified in this Draft EIR.

Some of the requirements in the Redevelopment Plans, including FAR caps may have been imposed to avoid or mitigate environmental impacts under prior CRA environmental documents, including without limitations, the EIRs for the Redevelopment Plans within the Downtown Plan Area. This EIR analyzes all of the environmental impacts based on the reasonably anticipated development of the Downtown Plan, which includes the three Redevelopment Plan areas, without CRA limitations. The City does not find that the elimination of any of these conflicting Redevelopment Plan's land use policies or requirements would result in a new or different impact from those already analyzed in this EIR. Based on above, there is no basis to find any new or different significant impact under this threshold due to a conflict with the Redevelopment Plans.

Mitigation Measures in the EIRs for the Chinatown, Central Industrial and City Center Redevelopment Plans. Some of the policies in the three Redevelopment Plans within the Downtown Plan Area that will be in conflict with the Downtown Plan are those that may have been incorporated into the Redevelopment Plans to reflect the mitigation measures in the environmental documents. Mitigation measures from prior EIRs or MNDs may be deleted or modified provided the lead or responsible agency prepares a new environmental clearance, which demonstrates that the agency considered the continuing need for the mitigation measure, states the reason for the change to the mitigation measure, and supports the decision to

remove or modify the mitigation measure with substantial evidence, and analyzes any significant impacts resulting from deletion or modification of the mitigation measure. To the extent the City is responsible for implementing some or all of the mitigation measures as the successor to the land use plans and functions in November 2019, the City's rationale and evidence for deleting or modifying the mitigation measures in the CEQA Clearances for the three Redevelopment Plans, including those related to the inconsistencies discussed above, as well as all other mitigation measures, and the analysis of impact resulting from modifying or deleting those mitigation measures, are provided in Appendix H.

Conclusion

Based on the above, the Downtown Plan would be consistent with applicable local and regional plans and policies. Thus, impacts related to inconsistency with land use plans and policies would be ***less than significant***.

New Zoning Code Impact

As described in Chapter 3.0, *Project Description*, Section 3.7.4, the Downtown Plan would utilize new General Plan Designations to better accommodate and correspond with the new zone districts, while still meeting the policy goals of the Framework Element. These changes would require minor updates to the General Plan Framework Element to allow the New Zoning Code to be applied to other areas of the City through a community plan update or amendment. The changes would have no effect on the existing policies and goals of the existing General Plan Framework Element.

The New Zoning Code would provide tools that facilitate future development that complies with the goals and policies of applicable land use plans. For example, new mixed-use zone districts are being developed for use around transit to improve access to jobs and commercial destination and reduce the use of vehicles (Mobility Plan Policy 3.3). The New Zoning Code can also be applied to expand bonus and incentive provisions for affordable units within walking distance of transit, which is consistent with the SCAG 2016-2040 RTP/SCS policy to focus new growth around transit, and consistent with the General Plan Framework Element policy, to encourage the location of new multi-unit residential development to occur in proximity to transit stations (Framework Element Policy 4.2). The New Zoning Code would support the use of transit by incentivizing pedestrian-oriented building design. For example, the New Zoning Code exempts active ground floor uses that wrap around parking areas from Floor Area calculations, while including above-grade parking in Floor Area calculations. These code standards have the potential to result in the creation of additional residential density and non-residential square footage, which may lead to population growth where the New Zoning Code is applied. However, it is expected that the development capacity of communities undergoing future community plan updates and amendments would be developed in accordance with SCAG projections and the proposed vision for the community as established in the City's adopted General Plan Framework Element.

Furthermore, the outdoor amenity space standard includes an incentive to make privately-owned open space publicly accessible, in line with the General Plan goal of improving Angelenos' access to parks. The New Zoning Code would also allow for the adaptive reuse of existing parking structures or parking areas constructed (at least 15 years) prior in certain commercial and residential areas of the City. The adaptive use of parking structures could increase population capacity and square footage of non-residential uses, where the New Zoning Code is applied. However, if an existing parking structure or Commercial-Mixed Community 1 (XC1) parking area were converted to another use, it would still be required to meet the density limits allowed by the zone. Further, if parking structures are converted, it is expected that the development capacity of communities undergoing future community plan updates and amendments would be developed in accordance with SCAG projections and the proposed vision for the community as established in the City's adopted General Plan Framework Element.

The City's Specific Plans, Overlays, Districts, and Master Plans would continue to operate as they currently do. However, elements of many of the City's existing overlays would be incorporated into the zones of the New Zoning Code through Frontage standards and Community Plan Implementation Overlays. The incorporation of these elements into the New Zoning Code would facilitate transparency and clarity and would not affect the enforceability of the policies. For example, parts of the City's existing Los Angeles River Implementation Overlay would be incorporated into the New Zoning Code by creating certain Form and Frontage Districts that could be used adjacent to the LA River to help implement the LA RIO overlay and the Los Angeles River Revitalization Plan. As such, the New Zoning Code is consistent with the goals and policies of the City's Specific Plans, Overlays, and Districts.

The New Zoning Code does not prescribe where zone districts would be applied in future community plan updates or amendments. As such, projecting the location and type of future growth would be speculative at this time; therefore, impacts cannot be identified. The New Zoning Code only applies to properties where a community plan is updated or amended in order to allow use of new zone districts, which would require environmental review pursuant to CEQA. Future environmental review of a proposed community plan update and associated zone districts would analyze potential community- and site-specific impacts related to consistency with goals and policies of local plans. The Proposed Project does not intend to implement the New Zoning Code outside of the Downtown Plan Area and therefore any indirect impacts from the future use of the New Zoning Code outside the Downtown Plan Area would be speculative. **A less than significant impact** would occur.

Mitigation Measures

Neither the Downtown Plan would nor the New Zoning Code would conflict with applicable City or SCAG policies; therefore, impacts would be **less than significant** and mitigation is not required.

CUMULATIVE IMPACTS

Cumulative impacts related to land use and planning consider Citywide development through 2040, which would add about 659,000 new residents, 293,000 new households, and 345,000 new employees (SCAG 2016-2040 RTP/SCS).

Division of an Established Community

Future development throughout Los Angeles may include the construction of new roadways or transit infrastructure that would physically divide an established community, and changes in land use and zoning that could potentially isolate a portion of an existing community. However, because the exact size, nature, and location of future developments and associated infrastructure improvements are not known at this time, it would be speculative to predict exactly what impacts may occur. Regardless, as discussed under Impact 4.10—1, the Downtown Plan does not include any features that would physically divide the Downtown Plan Area. To the contrary, certain improvements to transit facilities are expected to generally improve connectivity in the Downtown Plan Area as well as between the Downtown Plan Area and the rest of the region. The New Zoning Code does not include any specific provisions that would divide a community and any possible impacts related to division of a community would be addressed as part of individual community plan updates. As such, neither component of the Proposed Project would have impacts that are cumulatively considerable related to division of an established community. Cumulative impacts are **less than significant**.

Consistency with Land Use Plans/Policies

Future projects throughout the City may conflict with policies contained in the General Plan and 2016-2040 RTP/SCS that would result in adverse physical impacts to the environment. However, as discussed

under Impact 4.10-2, the Downtown Plan is consistent with applicable land use policies and the New Zoning Code only applies to properties where a community plan is updated or amended in order to allow use of new zones. The New Zoning Code would not be implemented outside of the Downtown Plan Area until applicable community plans are updated; therefore, any indirect impacts from the future use of the New Zoning Code outside the Downtown Plan Area would be speculative. Based on these facts, neither the Downtown Plan nor the New Zoning Code would have impacts that are cumulatively considerable as related to consistency with plans and policies. Cumulative impacts are ***less than significant***.

REFERENCES

- Community Redevelopment Agency of the City of Los Angeles (CRA/LA). 1980. Chinatown Redevelopment Project. <http://www.crala.org/internet-site/Projects/Chinatown/upload/chinatownredevelopmentplan.pdf>. Accessed May 2020.
- Community Redevelopment Agency of the City of Los Angeles (CRA/LA). 2002a. Redevelopment Plan for the City Center Redevelopment Project. http://www.crala.org/internet-site/Projects/City_Center/upload/citycenter.pdf. Accessed May 2020.
- Community Redevelopment Agency of the City of Los Angeles (CRA/LA). 2002b. Redevelopment Plan for the Central Industrial Redevelopment Project. http://www.crala.org/internet-site/Projects/City_Center/upload/citycenter.pdf. Accessed May 2020.
- Governor's Office of Planning and Research. 2017. State of California 2017 General Plan Guidelines. http://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed May 2020.
- Housing + Community Investment Department (HCIDLA). 2018. Is My Building a Residential Hotel? <http://hcidla.lacity.org/Residential-Hotels>. Accessed May 2020.
- Los Angeles, City of. 2008. Ordinance No. 179868. May 15, 2008. http://clkrep.lacity.org/online/docs/2008/08-0644_ord_179868.pdf. Accessed May 2020.
- City of Los Angeles. 2018. Historical Monument: El Pueblo de Los Angeles. <http://elpueblo.lacity.org/>. Accessed May 2020.
- Los Angeles County Department of Public Works (Los Angeles County). 2018. Airport Land Use Commission website. <http://planning.lacounty.gov/aluc/airports>. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 1973. Open Space Plan. June 1973. https://planning.lacity.org/Code_Studies/GeneralElement/openspaceelement.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 1980. Public Recreation Plan. https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 1992. Air Quality Element: An Element of the City of Los Angeles General Plan. November 1992. https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 1995. The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan. <https://planning.lacity.org/cwd/framwk/chapters/title.htm>. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 1996. Safety Element of the City of Los Angeles General Plan. February November 1996. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 1999. Noise Element of the City of Los Angeles General Plan. February 1999. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf. Accessed May 2020.

- Los Angeles Department of City Planning (LADCP). 2001. Conservation Element of the City of Los Angeles General Plan. March 2001. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2009. Downtown Design Guide. June 2009. <http://urbandesignla.com/resources/docs/DowntownDesignGuide/lo/DowntownDesignGuide.pdf>. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2010. Los Angeles Sports and Entertainment District Specific Plan. https://planning.lacity.org/odocument/b7beb61c-40c1-433d-bf9d-6f51e345bba3/Los_Angeles_Sports_and_Entertainment_District_Specific_Plan.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2012a. Convention and Event Center Specific Plan. September 13, 2012. https://planning.lacity.org/eir/ConventionCntr/Other/849%20Exhibits/CEC_SP.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2012b. Cornfield Arroyo Seco Specific Plan. https://planning.lacity.org/EIR/CornfieldArroyo/CASP_AdoptedOrd.htm. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2013a. Housing Element 2013-2021. December 2013. https://planning.lacity.org/odocument/883be4c9-392f-46e5-996b-b734274da37d/Housing_Element_2013_-_2021_.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2013b. Bunker Hill Specific Plan. June 12, 2013. http://clkrep.lacity.org/online/docs/2011/11-1245_ord_182576.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2015. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan. March 2015. https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2016a. Central City Community Plan. Adopted 2003, amended September 2016. https://planning.lacity.org/odocument/2ddbde0-a8fb-46e3-a151-f52fd09cc084/Central_City_Community_Plan.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2016b. Central City North Community Plan. Adopted 2003, amended September 2016. https://planning.lacity.org/odocument/e06434a6-341a-48ed-97dc-8f6a85780951/Central_City_North_Community_Plan.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2016. Mobility Plan 2035: An Element of the General Plan. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2017. Zone Information Map Access System. <http://zimas.lacity.org/>. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2017b. Draft Value Capture Ordinance. May 25, 2017. <https://planning.lacity.org/ordinances/docs/ValueCapture/ProposedOrdinance.pdf>. Accessed May 2020.
- Los Angeles Department of City Planning (LADCP). 2018a. Technical Clarifications to the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), Case

No. CPC-2017-1914-MSC. <https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf>. Accessed May 2020.

Los Angeles Department of City Planning (LADCP). 2018b. Available Other Plans/Guidelines website. <http://planning.lacity.org/>. Accessed May 2020.

Los Angeles Department of City Planning (LADCP). 2018c. Venice Local Coastal Program website. <https://www.venicelcp.org/>. Accessed May 2020.

Los Angeles Department of City Planning (LADCP). 2018d. Community Redevelopment Agency Code Amendment FAQ. https://planning.lacity.org/ordinances/docs/CRA_CleanUp/faq.pdf. Accessed June 2020.

Los Angeles Department of City Planning (LADCP). 2020. Plan Overlays. <https://planning.lacity.org/plans-policies/overlays>. Accessed June 2020.

Metro. 2017. Link Union Station (Link US) Overview Fact Sheet. November 2017. http://media.metro.net/projects_studies/regionalrail/factsheets_linkunionstation.pdf. Accessed May 2020.

National Park Service (NPS). 2018. Little Tokyo Historic District, Los Angeles, California. <https://www.nps.gov/places/little-tokyo-historic-district.htm>. Accessed May 2020.

Nettler, Jonathan. 2012. “With Innovative Plan, L.A. Says Adios to Parking Requirements.” Planetizen. December 14, 2012. <https://www.planetizen.com/node/59717>. Accessed May 2020.

Southern California Association of Governments (SCAG). 2012. Regional Housing Needs Assessment (RHNA). http://rtpscs.scag.ca.gov/Documents/rhna/SCAG_RHNA_Factsheet_2012.pdf. Accessed May 2020.

Southern California Association of Governments (SCAG). 2016. 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy. <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed May 2020.

Urban Land Institute, Los Angeles. 2012. “What Now? The Demise of the CRA in California.” April 4, 2012.