

### III. SCEA CRITERIA AND CONSISTENCY

#### Project Consistency with the Transit Priority Project Criteria

As discussed in Section I, Introduction, to use a Sustainable Communities Environmental Assessment (SCEA) a project needs to be a qualifying Transit Priority Project (TPP) by meeting all of the following criteria:

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS);
2. Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

As discussed below and shown on Table III-1, the Project meets these criteria.

**Table III-1  
Transit Priority Criteria**

<b>I. Sustainable Communities Strategy</b>	<b>Yes</b>	<b>No</b>
The project is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project areas in SCAG's adopted Sustainable Communities Strategy.	X	
<b>II. Transit Priority Project</b>		
<i>To be considered a Transit Priority Project (TPP) as defined by PRC Section 21155(b), the project must meet all of the following criteria.</i>		
Based on total building square footage, the project contains at least 50 percent residential use.	X	
AND, if the project contains between 26 percent and 50 percent non-residential uses, the Floor Area Ratio (FAR) is greater than 0.75.	n/a	
The project includes a minimum net density of at least 20 dwelling units per acre.	X	
The project site is located within one-half mile of either the following which have been included in the SCAG Regional Transportation Plan:	X	
(a) a major transit stop that contains an existing rail station, a ferry terminal served by transit, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods; or		
(b) a high quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.		

***Consistency with Criterion #1 – The Project is consistent with the general use designation, density, and building intensity and applicable policies of SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).***

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the Project area, and the applicable “sustainable communities strategy” is SCAG’s 2016-2040 RTP/SCS.

*The Project is consistent with the General Use Designation, Density, and Building Intensity*

The Project is consistent with the general land use designation, density, and building intensity in the SCAG 2016-2040 RTP/SCS. Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban, compact, or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016-2040 RTP/SCS, pp. 20-21.)

The Project Site area is located within an “Urban” Land Development Category (LDC) – the highest density and most intense land development category assessed in the 2016-2040 RTP/SCS (refer to Figure III-1 and Figure III-2). The 2016-2040 RTP/SCS describes the Urban LDC as follows:

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

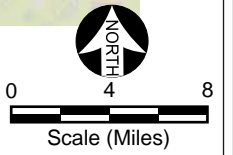
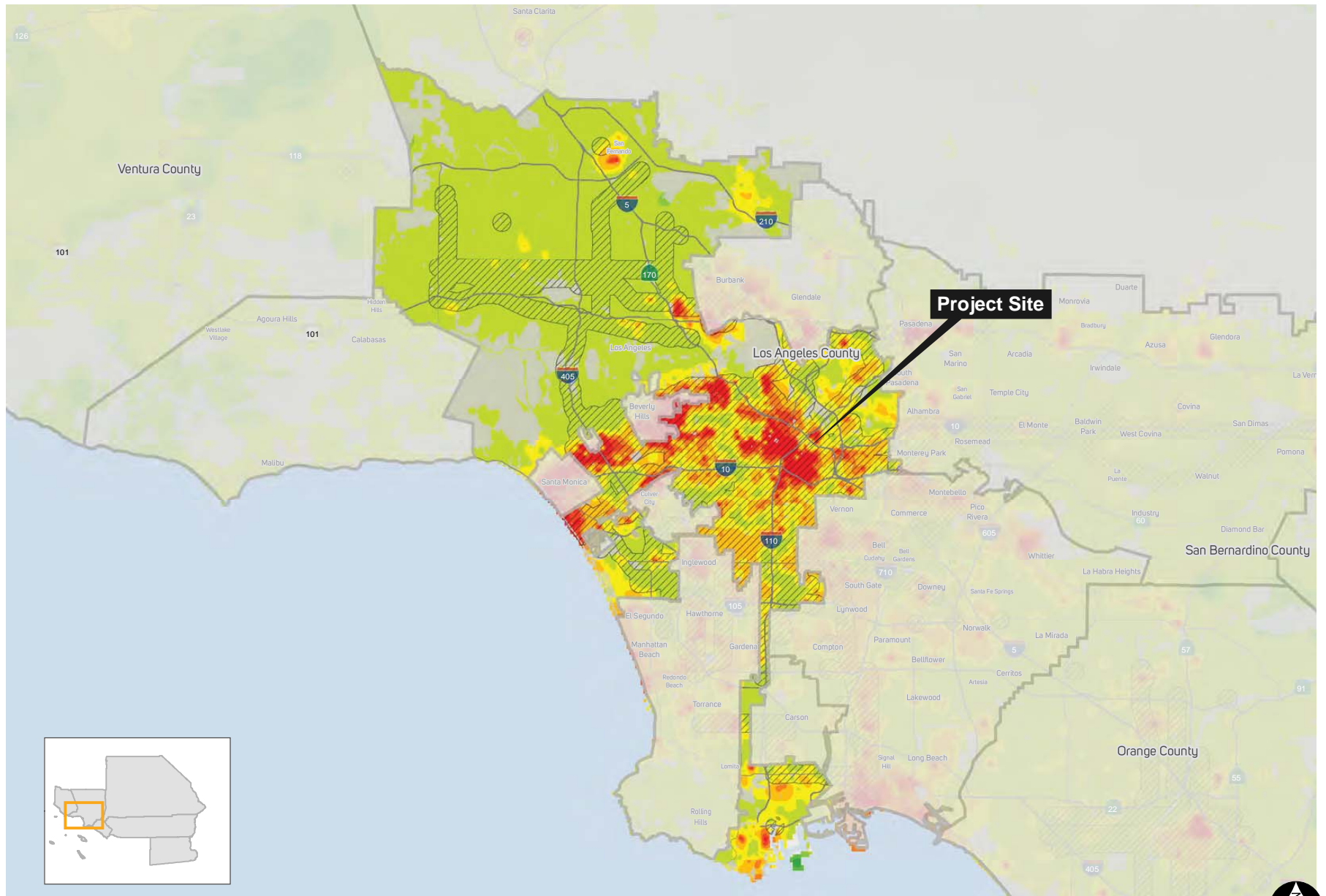


Figure III-1  
 Forecasted Regional Development Types  
 by Land Development Categories (2012) - Los Angeles City Subregion

Source: SCAG, 2015.

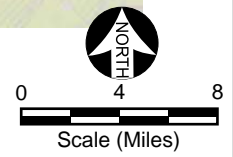
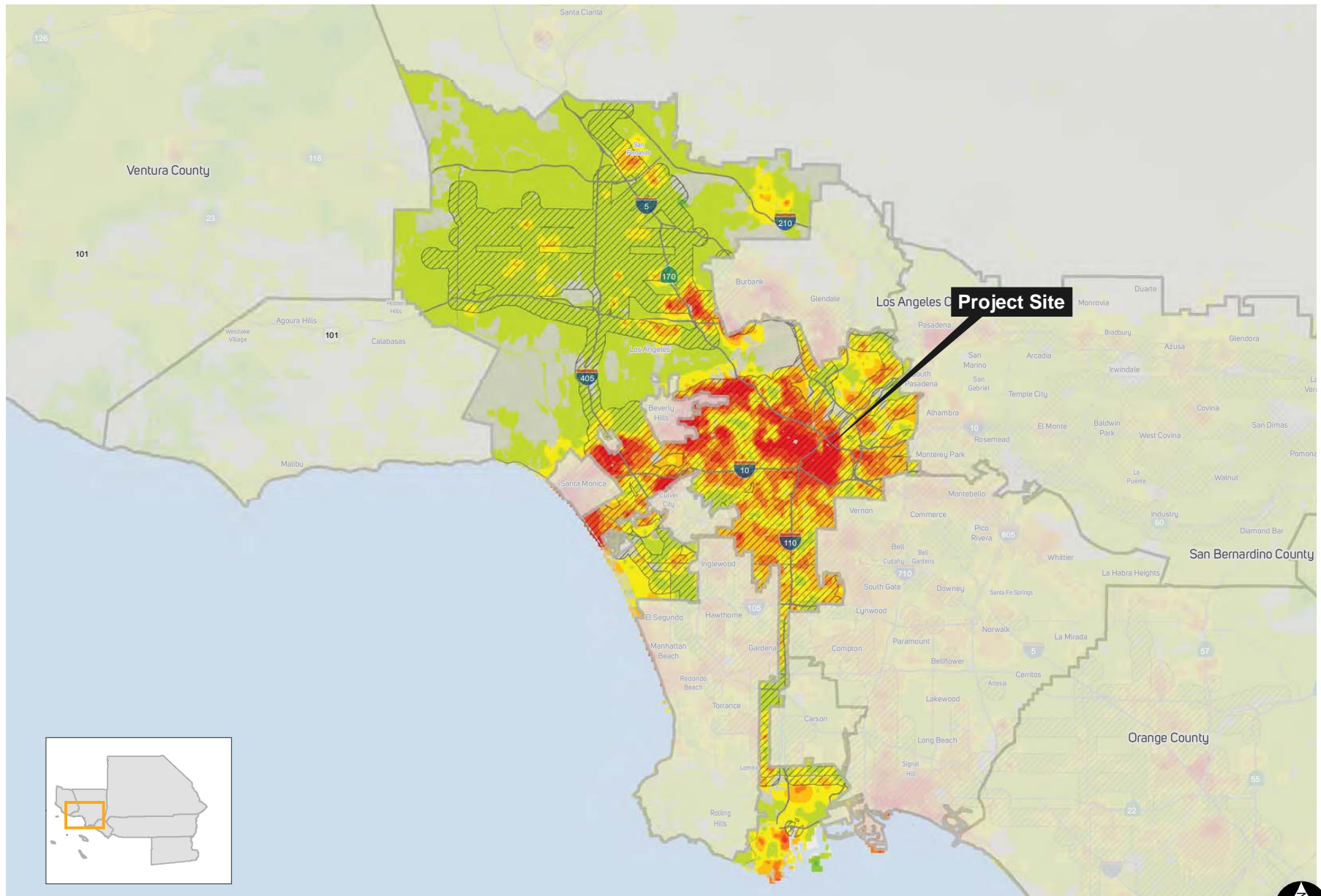


Figure III-2  
Forecasted Regional Development Types  
by Land Development Categories (2040) - Los Angeles City Subregion

Source: SCAG, 2015.



The Project would be consistent with the Urban LDC. The Project is located within a highly urbanized area within the Downtown area of the City of Los Angeles (City). The Project is an infill development that would provide 428 residential dwelling units and up to 5,610 square feet of commercial land uses (including an approximately 2,980-square-foot leasing office and up to 2,630 square feet of neighborhood-serving retail land uses). The Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743 that supports transit opportunities and promotes a walkable environment. Additionally, access to the Project Site is served by a well-connected street network. As such, the Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle. Regional access to the Project Site area is provided via Interstate 110 to the west, State Route 101 to the north, and Interstate 10 to the south. Local access to the Project Site is provided via 4<sup>th</sup> Street to the south and Hill Street to the west. The Project Site is also well served by public transit, including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines. Ridership information for public transit near the Project Site is shown on Table III-2.

**Table III-2  
Average Daily Public Transit Ridership Near the Project Site**

<b>Local Lines<sup>1</sup></b>	<b>Weekday</b>	<b>Saturday</b>	<b>Sunday</b>
2	12,279	8,838	6,400
4	14,722	12,069	9,798
10	11,704	6,680	4,853
28	9,064	9,180	7,418
30	12,443	10,178	8,455
35	7,987	4,694	3,225
40	14,457	10,003	9,321
45	14,376	11,787	8,891
81	13,420	8,914	6,665
83	2,509	1,687	1,506
90	7,106	3,786	2,514
94	4,431	5,607	4,309
725	<sup>2</sup>	<sup>2</sup>	<sup>2</sup>
745	5,835	3,072	1,857
794	5,835	3,072	1,857
Red/Purple Line	137,142	81,837	70,250
<b>Total</b>	<b>273,310</b>	<b>181,404</b>	<b>147,319</b>
<sup>1</sup> Source for Local Line information: Metro, <a href="http://isotp.metro.net/MetroRidership/Index.aspx">http://isotp.metro.net/MetroRidership/Index.aspx</a> , August 30, 2019. Metro, <a href="http://isotp.metro.net/MetroRidership/YearOverYear.aspx">http://isotp.metro.net/MetroRidership/YearOverYear.aspx</a> , August 30, 2019.			
<sup>2</sup> Information not available.			

The 2016-2040 RTP/SCS further demonstrates that HQTA's may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Project is a mixed-use project, which includes 428 residential dwelling units and ground-floor commercial uses. Consistent with the Downtown Housing Incentive Ordinance, the Project would set-aside Restricted Affordable units, including 22 units (5 percent of the total number of units) for Very-Low-Income households and one of the following: 1) 10 percent of the total number of units for Low Income households; 2) 15 percent of the total

number of units for Moderate Income households; or 3) 20 percent of the total number of units for Workforce Income households. The Project features ground-floor retail uses designed to activate both Hill Street and 4<sup>th</sup> Street and enhance the overall pedestrian experience. Pedestrian access to the Project Site would be available from both Hill and 4<sup>th</sup> Streets via landscaped areas that would link the pedestrian to sidewalks, transit lines, and the adjacent the Los Angeles County Metropolitan Transportation Authority's (Metro) Station. The Project provides uses that would be similar to those already found in the area to provide additional synergy with patrons, customers, and visitors to the area throughout the day and night. Also, the Project includes 471 bicycle parking spaces and a bicycle repair station. The Project would provide parking that is consistent with the Los Angeles Municipal Code (LAMC) standards. Thus, the Project is similar to other developments within HQTAs.

The 2016-2040 RTP/SCS includes various urban footprint place types in the Urban LDC, including mixed use, residential, commercial, office, R&D, industrial, civic, and open space.<sup>1</sup> The Project is consistent with place types within the urban land development category as further discussed below.

The Project is a mixed-use development consisting of residential and commercial land uses in a highly-urbanized part of Downtown Los Angeles, on a site that is currently occupied by an 850-square-foot restaurant and a surface parking lot. Adjacent land uses are a mix of mid- to high-rise buildings, containing a mix of office, commercial, restaurant, retail, industrial, and residential uses. The Project is approximately 99 percent residential, and the housing consists of 100 percent multi-family residential units. The proposed building would include 32 aboveground floors, consistent with the Urban Residential place type. Project. The Project Site area is supported by high levels of regional and local transit, including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines.) In 2017, a total estimated annual ridership of 2,113,129 was served by Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 94, 728, 745, and 794.<sup>2</sup> Also, the Project Site is directly adjacent to the Metro Red Line subway portal, with service to North Hollywood and which had a total annual ridership of 1,962,211 in 2017.<sup>3</sup> The Project would construct 570 household units per acre and would have a total net FAR of 9.6:1 and 33 stories.

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<sup>1</sup> SCAG 2016-2040 RTP/SCS Background Documentation, Urban Footprint Place Types, [http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint\\_PlaceTypesSummary.pdf](http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf), accessed July 24, 2017. Refer to Appendix B; see also Place Types Categorized into Land Development Categories, available at: [http://scagrtpscs.net/Documents/2016/supplemental/LDC\\_PlaceType.pdf](http://scagrtpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf).

<sup>2</sup> Metro, <http://isotp.metro.net/MetroRidership/Index.aspx>, May 11, 2018.

<sup>3</sup> *Ibid.*

## Urban Mixed-Use

Urban Mixed Use		
	<b>Land Use Mix</b> <i>Residential</i> <b>18%</b> <i>Employment</i> <b>16%</b> <i>Mixed Use</i> <b>45%</b> <i>Open Space/Civic</i> <b>21%</b>	<b>Residential Mix</b> <i>SF Large Lot</i> <b>0%</b> <i>SF Small Lot</i> <b>0%</b> <i>Townhome</i> <b>0%</b> <i>Multi-Family</i> <b>100%</b>
	<b>Built Environment</b> <i>Intersections per mile</i> <b>200</b> <i>Average Floors</i> <b>23</b> <i>Floors Range</i> <b>15 – 100</b> <i>Total Net FAR</i> <b>9.0</b>	<b>Employment Mix</b> <i>Office</i> <b>80%</b> <i>Retail</i> <b>20%</b> <i>Industrial</i> <b>0%</b>
	<b>Gross Density Range</b> ( <i>per acre</i> ) <i>Household</i> <b>40-500+</b> <i>Employee</i> <b>50-500+</b>	<b>Average Density</b> ( <i>per acre</i> ) <i>Household</i> <b>85</b> <i>Employee</i> <b>266</b>


*Urban Mixed-Use districts are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Parking is typically structured, below or above ground. Workers, residents, and visitors are well served by transit and can walk or bike for many of their transportation needs.*

*The land use mix for this place type is typically approximately 18 percent residential, 16 percent employment, 45 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net floor area ratio is 9.0; floors range from 15– 100 stories, and the gross density ranges from 50 – 500 employees per acre and 40 – 500+ households per acre.<sup>4</sup>*

*Source: SCAG, SCS Background Documentation Appendix, April 2016.*

<sup>4</sup> *Ibid.*

Urban Residential

Urban Residential		
	<b>Land Use Mix</b> <i>Residential 64%</i> <i>Employment 4%</i> <i>Mixed Use 12%</i> <i>Open Space/Civic 21%</i>	<b>Residential Mix</b> <i>SF Large Lot 0%</i> <i>SF Small Lot 0%</i> <i>Townhome 0%</i> <i>Multi-Family 100%</i>
	<b>Built Environment</b> <i>Intersections per mile 200</i> <i>Average Floors 18</i> <i>Floors Range 5 – 60</i> <i>Total Net FAR 9.0</i>	<b>Employment Mix</b> <i>Office 22%</i> <i>Retail 78%</i> <i>Industrial 0%</i>
	<b>Gross Density Range</b> <i>(per acre)</i> <i>Household 75-500+</i> <i>Employee 0-50+</i>	<b>Average Density</b> <i>(per acre)</i> <i>Household 131</i> <i>Employee 44</i>

*Urban Residential place types “are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking [is] usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.*

*The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net FAR is 9.0; floors range from 15 – 100 stories; and the gross density ranges from 0 – 50 employees per acre and 75 – 500+ households per acre.<sup>5</sup>*

*Source: SCAG, SCS Background Documentation Appendix, April 2016.*

<sup>5</sup> *Ibid.*



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

**Table III-3  
SCAG Population and Housing Projections for the City of Los Angeles,  
Los Angeles County, and the SCAG Region**

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

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

Based on the City's current household demographics (e.g., an average of 2.43 persons per household), the construction of 428 residential dwelling units would result in an increase in approximately 1,040 permanent residents at the Project Site.<sup>6</sup> It is noted that because the proposed mixture of floor plans is dominated by studios and one bedroom units (totaling 302 of the 428 total units), the overall average number of persons per household may be lower than the current citywide average). The Project's provision of 428 housing units and projected population of 1,040 would be consistent with SCAG's forecast of 364,800 additional households and approximately 763,900 persons in the City between 2012 and 2040.<sup>7</sup>

*The Project is consistent with the Applicable 2016-2040 RTP/SCS Policies Specified for the Project Area*

The Project is consistent with SCAG's growth projections for the City, which supports the conclusion that the Project is consistent with SCAG policies. (Refer Section V, Environmental Impact Analysis, Checklist Topic 10, Population and Housing, for a discussion on the Project's consistency with SCAG's population and housing growth.) Additionally, as discussed on Table III-4, the Project would be consistent with applicable goals and policies of SCAG's 2016-2040 RTP/SCS.

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<b>2016-2040 RTP/SCS Goal 1</b> Align the plan investments and policies with improving regional economic development and competitiveness.	<b>Not Applicable.</b> This Goal is directed towards transportation projects and not does apply to the Project.
<b>2016-2040 RTP/SCS Goal 2</b> Maximize mobility and accessibility for all people and goods in the region.	<b>Consistent.</b> The Project Site is located in a highly urbanized area in the City. The Project would develop 428 residential dwelling units and up to 5,610 square feet of commercial land uses (including an approximately 2,980-square-foot leasing office and up to 2,630 square feet of neighborhood-serving retail land uses) within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743. The Project Site is in close proximity to existing bus lines (including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines). The Project Site is directly adjacent to the Metro Red Line subway portal. In addition, the Project would be located near commercial uses and employment areas in Downtown Los Angeles. The Project would provide residents and visitors with convenient

<sup>6</sup> The 2016 American Community Survey (ACS) persons-per-household rate is for multi-family residences and is from the 2012-2016 timeframe. Source: City of Los Angeles Demographics Unit, Jack Tsao, 2018.

<sup>7</sup> This assumes that housing units and households are the same.

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
<p><b>2016-2040 RTP/SCS Goal 3</b> Ensure travel safety and reliability for all people and goods in the region.</p>	<p>access to public transit and opportunities for walking and biking.</p> <p><b>Consistent.</b> The Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and by including ground floor uses adjacent to a Metro transit plaza to allow direct pedestrian access to transit. The Project would provide 512 secure bicycle spaces, most of which would be located within enclosed parking areas. Also, the Project would include street lighting and lighting of all pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be subject to the site plan review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways.</p>
<p><b>2016-2040 RTP/SCS Goal 4</b> Preserve and ensure a sustainable regional transportation system.</p>	<p><b>Not Applicable.</b> This goal is directed towards SCAG transportation projects and does not apply to the Project. The 2016-2040 RTP states, "A transportation system is sustainable if it maintains its overall performance over time in an equitable manner with minimum damage to the environment, and at the same time does not compromise the ability of future generations to address their transportation needs. Sustainability, therefore, pertains to how our decisions today impact future generations. One of the measures used to evaluate system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system performance at current conditions. The 2016-2040 RTP/SCS includes two additional new measures to support this outcome: State Highway System pavement condition and local roads pavement condition."<sup>8</sup> As discussed in the Project's Traffic Study (located in Appendix M), the Project would not create a significant impact at any of the study intersections. Additionally, as discussed in the Traffic Study, the Project would not create a significant impact at any CMP monitoring location.</p>

<sup>8</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<p><b>2016-2040 RTP/SCS Goal 5</b> Maximize the productivity of our transportation system.</p>	<p><b>Consistent.</b> The Project includes 428 residential dwelling units and up to 5,160 square feet of commercial uses (including Project- and neighborhood-serving retail uses). Given the Project Site's location close to transit, the Project would encourage the utilization of transit as a mode of transportation to and from the Project area. Thus, the Project would contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. Moreover, as discussed in the Project's Traffic Study (located in Appendix M), the Project would not create a significant impact at any of the study intersections. Additionally, as discussed in the Traffic Study, the Project would not create a significant impact at any CMP monitoring location.</p>
<p><b>2016-2040 RTP/SCS Goal 6</b> Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p>	<p><b>Consistent.</b> The Project would place residential dwelling units and ground-floor commercial space in a Transit Priority Area. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project Site in Downtown Los Angeles promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Project would improve the public sidewalks adjacent to Project Site and would include active ground-floor uses and a Metro transit plaza to enhance the pedestrian experience and promote walkability. In addition, the Project would provide 512 bicycle spaces to promote travel by bicycle.</p> <p>LADOT encourages developers to design and construct transit-friendly projects that provide safe and walkable sidewalks to and from transit stations for project patrons. LADOT's Traffic Analysis Guidelines place emphasis on transportation demand management strategies, trending away from automobile-centric solutions to trip reduction and on providing multi-modal solutions. In line with the City policy to promote the use of transit and walking, LADOT, at its discretion, may allow up to a 25 percent transit/walk trip credit subject to the following guidelines, on a case-by-case basis. Given the Project Site's proximity to the Metro Red Line's Pershing Square station entrance and 17 bus lines and given the Project's mix of residential</p>

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
	<p>and commercial land uses, the following trip credits are assumed for the Project:</p> <ul style="list-style-type: none"> <li>• Transit Usage – 25 Percent</li> <li>• Existing Active Land Use – Refer to Table V-55 on Page V-198 in Section V (Environmental Impact Analysis)</li> <li>• Pass-By Trips (Retail/Restaurant) – 50 Percent</li> </ul>
<p><b>2016-2040 RTP/SCS Goal 7</b> Actively encourage and create incentives for energy efficiency, where possible.</p>	<p><b>Consistent.</b> The Project would comply with the City's Green Building Code and the California Green Building Code, including requirements for a green or high albedo roof and that at least ten percent of all parking spaces on-site shall include electric vehicle (EV) charging stations. Additionally, the Project would be designed and constructed to achieve Leadership in Energy and Environmental Design (LEED) Homes Gold standards, which exceed Title 24 energy efficiency standards by approximately 10 percent.</p>
<p><b>2016-2040 RTP/SCS Goal 8</b> Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area in the City. The Project would develop 428 residential dwelling units and up to 5,610 square feet of commercial land uses (including an approximately 2,980-square-foot leasing office and up to 2,630 square feet of neighborhood-serving retail land uses) within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743. The Project Site is in close proximity to existing bus lines (including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines.) The Project Site is directly adjacent to the Metro Red Line subway portal. In addition, the Project would be located near commercial uses and employment areas in Downtown Los Angeles. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking.</p>
<p><b>2016-2040 RTP/SCS Goal 9</b> Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p><b>Not Applicable.</b> This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 1</b> Transportation investments shall be based on SCAG's adopted regional Performance Indicators.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual</p>



**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
	development projects and no further analysis is required.
<p><b>2016-2040 RTP/SCS Guiding Policy 2</b> Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Project would contribute to a safe, well maintained, and efficient multimodal transportation system. The Project would provide landscaping along the public right-of-way, active ground-floor uses, and a Metro transit plaza, which promotes and supports pedestrian activity in the area. As discussed in the Project's Traffic Study (located in Appendix M), the Project would not create a significant impact at any of the study intersections. Additionally, the Project would not create a significant impact at any CMP monitoring location.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 3</b> RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.</p>	<p><b>Not Applicable.</b> This Goal is directed towards SCAG and the City and not does apply to the Project. The Project Site is located in a highly urbanized area in the City. Nevertheless, the Project would support this policy through its development of 428 residential dwelling units and up to 5,610 square feet of commercial land uses (including an approximately 2,980-square-foot leasing office and up to 2,630 square feet of neighborhood-serving retail land uses) within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743. The Project Site is in close proximity to existing bus lines (including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines.) The Project Site is directly adjacent to the Metro Red Line subway portal. In addition, the Project would be located near commercial uses and employment areas in Downtown Los Angeles. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 4</b> Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.</p>	<p><b>Not Applicable.</b> This policy is directed towards transportation investment by SCAG. However, the Project would support active transportation (e.g. walking and bicycling) by providing landscaping along the public rights of way, active ground floor uses, and a Metro transit plaza, which promotes and supports pedestrian activity in the area. Additionally, the Project Site's location within a HQTAs promotes the use of public transit and pedestrian activity.</p>

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<p><b>2016-2040 RTP/SCS Guiding Policy 5</b> HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.</p>	<p><b>Not Applicable.</b> This policy is directed towards transportation investment by SCAG to support high occupancy vehicles (HOV), transit and rideshare. Although this policy is not applicable to the Project, the Project Site's location in a HQTAs promotes the use of public transit and pedestrian activity.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 6</b> The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.</p>	<p><b>Not Applicable.</b> This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Project is located within a HQTAs (as defined SCAG) and a transit priority area (as defined by SB 743). The Project would support public transportation and other alternative methods of transportation (e.g., walking and biking).</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 7</b> The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG transportation projects to encourage and support transportation investments.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 8</b> Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and not does apply to the Project.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 1</b> Identify regional strategic areas for infill and investment.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG to identify regional strategic areas. The Project is an infill development in a HQTAs (defined by SCAG) and within a transit priority area (as defined by SB 743). Nevertheless, the Project is an infill development that would provide a mix of residential and commercial uses in a highly urbanized area within the City.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 2</b> Structure the plan on a three-tiered system of centers development.<sup>9</sup></p>	<p><b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and not does apply to the Project. Nevertheless, the Project Site is located in an "existing" center where existing transportation infrastructure exists to support the proposed density of the Project.</p>

<sup>9</sup> The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<p><b>2016-2040 RTP/SCS Land Use Policy 3</b> Develop "Complete Communities."</p>	<p><b>Consistent.</b> SCAG describes the development of "complete communities" to provide areas that encourages households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.<sup>10</sup></p> <p>As stated above, the Project would place residential and commercial land uses in a transit-rich area. The Project Site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Thus, the Project would be consistent with this land use policy.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 4</b> Develop nodes on a corridor.</p>	<p><b>Not Applicable.</b> The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. The Project is located within a HQTAs and a transit priority area. The Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 5</b> Plan for additional housing and jobs near transit.</p>	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area in the City. The Project would develop 428 residential dwelling units and up to 5,610 square feet of commercial land uses (including an approximately 2,980-square-foot leasing office and up to 2,630 square feet of neighborhood-serving retail land uses) within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743. The Project Site is in close proximity to existing bus lines (including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red</p>

<sup>10</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	and Purple lines.) The Project Site is directly adjacent to the Metro Red Line subway portal. In addition, the Project would be located near commercial uses and employment areas in Downtown Los Angeles. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking.
<p><b>2016-2040 RTP/SCS Land Use Policy 6</b> Plan for changing demand in types of housing.</p>	<p><b>Consistent.</b> The Project would provide 428, including 226 studio units, 75 1-bedroom units, and 127 2-bedroom units. Consistent with the Downtown Housing Incentive Ordinance, the Project would set-aside Restricted Affordable units, including 22 units (5 percent of the total number of units) for Very-Low-Income households and one of the following: 1) 10 percent of the total number of units for Low Income households; 2) 15 percent of the total number of units for Moderate Income households; or 3) 20 percent of the total number of units for Workforce Income households. The majority of multi-family units would be located on floors 6 through 30 with some units also located on floor 31. Units would range in size from 407 to 1,243 square feet. The Project's units would contribute to a range of housing choices to meet housing demand in the City and Downtown, including existing employees and residents in the Project area.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 7</b> Continue to protect stable, existing single-family areas.</p>	<p><b>Consistent.</b> The Project Site is not located on or near, and would not displace, any existing single-family residential neighborhoods. The Project provides additional housing in the City on an infill lot.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 8</b> Ensure adequate access to open space and preservation of habitat.</p>	<p><b>Consistent.</b> The Project is located within an urbanized area within the City. Development of the Project would not remove any existing open space areas or habitat, since the Project Site is fully developed. The Project would provide 41,378 square feet of open space that exceeds the required amount pursuant to the LAMC.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 9</b> Incorporate local input and feedback on future growth.</p>	<p><b>Consistent.</b> Since the Project is consistent with the Central City Community Plan, it can be considered to be consistent with the local input and feedback on the City's vision for growth in this part of the Downtown area.</p>
<p><b>2016-2040 RTP/SCS Benefit 1:</b> The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and</p>	<p><b>Consistent.</b> The Project would provide multi-family housing and job-creating commercial uses to an existing, transit-accessible area. The Project's 428 dwelling units would include 226 studio units, 75 1-bedroom units, and 127 2-</p>

**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
pedestrian improvements, and efficient transportation infrastructure.	bedroom units. Consistent with the Downtown Housing Incentive Ordinance, the Project would set-aside Restricted Affordable units, including 22 units (5 percent of the total number of units) for Very-Low-Income households and one of the following: 1) 10 percent of the total number of units for Low Income households; 2) 15 percent of the total number of units for Moderate Income households; or 3) 20 percent of the total number of units for Workforce Income households. The majority of multi-family units would be located on floors 6 through 30, with some units located on floor 31. Units would range in size from 407 to 1,243 square feet. In addition, the Project would provide bicycle parking and various pedestrian-oriented improvements, including improved sidewalks, active ground-floor uses, and a Metro transit plaza.
<b>2016 RTP/SCS Benefit 2:</b> The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.	<b>Not Applicable.</b> Benefit 2 is directed towards SCAG and not does apply to the Project. The Project is an infill, mixed-use project located within a HQT, thereby decreasing time and cost of traveling between places.
<b>2016 RTP/SCS Benefit 3:</b> The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households	<b>Consistent.</b> The Project would comply with the City's Green Building Code and the California Green Building Code, including requirements for a green or high albedo roof and that at least ten percent of all parking spaces on-site shall include electric vehicle (EV) charging stations. The Project's incorporation of bicycle- and pedestrian-friendly elements and location near various bus lines would provide future residents with various affordable transportation options. The Project is a high-density mixed-use development on an infill site, well served by existing utilities.
<b>2016 RTP/SCS Benefit 4:</b> Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	<b>Consistent.</b> The Project would encourage improved access and mobility by providing both residential and commercial uses on a single site. The Project's location in an urban area and provision of on-site retail uses would provide residents and visitors with dining options that are easily accessible on foot or by bicycle. In addition, the Project's access to various transit options will encourage the use of existing and proposed mass transit. The Project also includes



**Table III-4  
Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	41,378 square feet of open space, including a including (but not limited to) 10,100 square feet of private open space, a 14,332-square-foot courtyard, a 1,453-square-foot business lounge, a 5,179-square-foot club room, a 1,730-square-foot fitness room, a 5,508-square-foot sky deck, and a 3,126-square-foot sky lounge.
<i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.</i>	

***Consistency with Criterion #2 – The Project contains at least 50 percent residential use.***

The Project includes the construction of a total floor area of 310,503 square feet. The Project includes 428 residential dwelling units, encompassing 307,994 square feet of residential floor area and comprising 99 percent of the total floor area. As such, the Project would be consistent with this Criterion.

***Consistency with Criterion #3 – The Project includes a minimum net density of at least 20 units per acre.***

The Project Site is approximately 0.75 acres before street easements and dedications. The Project includes 428 residential dwelling units and as such, the Project provides approximately 570 dwelling units per acre. As such, the Project would be consistent with this Criterion.

***Consistency with Criterion #4 – The Project Site is located within one-half mile of a major transit stop or a high quality transit corridor included in the 2016-2040 RTP/SCS.***

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

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project Site is located directly adjacent to Metro’s Red Line’s Pershing square subway station northeast portal and thus, the Project Site is located within a half mile of a major transit stop. Further, the Project Site is located in an urban area served by multiple local bus lines that are adjacent to the site and with service interval of 15 minute or less during morning and afternoon peak commute periods, including Metro Local Lines 2/302, 4, 10, 18, 28, 30/330, 40, 45, 81, 90/91, and 745 (refer to Table III-2). Given these circumstances, the Project Site is located within a half-mile of a High Quality Transit Corridor. As such, the Project is consistent with this Criterion.