

Sustainable Communities Environmental Assessment

III. SCEA Criteria and Transit Priority Project Consistency Analysis

Senate Bill 375

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

On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). For the SCAG region, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040. The RTP/SCS creates a plan to achieve the GHG reduction targets set forth by CARB: eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The RTP/SCS has determined that GHG emissions reductions will exceed the CARB targets by achieving (below 2005 levels) by eight percent by 2020; 18 percent by 2035; and 21 percent by 2040. The RTP/SCS outlines strategies to meet or exceed the targets set by CARB.¹

Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see Public Resources Code §21155 (a) and (b)):

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 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

¹ *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, page 15.*

4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

The Project meets each criteria as explained below.

Criterion #1: The Project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2016-2040 RTP/SCS.

In the RTP/SCS, 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.² The RTP/SCS, Sustainable Communities Strategy Background Documentation, Appendix (April 2016), forecasted LDCs by county and subregion for 2012 and 2040. The Project Site is designated as “Urban”, the highest density and most intense land development category assessed in the RTP/SCS.³ The Urban Land Development Category is described 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. (page 20)

The Project would be consistent with the Urban Land Use Development Category. The Project Site is located within a highly urbanized Venice community of the City of Los Angeles. The Project is an infill project that would provide affordable multi-family residential units, serving seniors and families in an urbanized setting within proximity to commercial, retail, service, and institutional uses. The Project is well-served by bus lines and is located within a High Quality Transit Area as defined by SCAG and a Transit Priority Area as defined by SB 743. Additionally, access to the Project Site is served by a well-connected street network. The Project would also provide 72 bicycle parking spaces so as to reduce vehicle dependency.

The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. The consistency of the Project with the RTP/SCS is addressed in Table III-1,

² Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, page 20.

³ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, Sustainable Communities Strategy (SCS) Background Documentation Appendix, Exhibit 13 Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion and Exhibit 14 Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion.

Consistency of the Project with Applicable Goals and Policies of the 2016-2040 RTP/SCS. Goals and policies that are not applicable at a project-level are not included in the table. As shown, the Project would be consistent with the applicable goals in the RTP/SCS.

**Table III-1
Consistency of the Project With Applicable Goals and Policies
of the 2016-2040 RTP/SCS**

Goal	Project Consistency
<p>Goal 2: Maximize mobility and accessibility for all people and goods in the region.</p>	<p>Consistent. Multiple public transportation opportunities are provided in close proximity to the Project Site. Lincoln Boulevard, approximately 1,000 feet east of the Project Site, is considered a High Quality Transit Area by SCAG.⁴ The Santa Monica Big Blue Bus (Lines 3, R3 and 18), the Culver City Bus (Lines 1, 2, 5, and 7), and Metro (Line 108) provide local bus service within reasonable walking distance of the Project Site. The Project would develop 98 new residential uses in proximity to transit and a walkable community, providing new housing opportunities where currently none exist.</p>
<p>Goal 3: Ensure travel safety and reliability for all people and goods in the region.</p>	<p>Consistent. The Project Site is located in proximity to public transit opportunities, which provide safe and reliable travel options for people and goods. The Project would also provide bicycle parking.</p>
<p>Goal 5: Maximize the productivity of our transportation system.</p>	<p>Consistent. The Project is located in a dense urban area. The Project would develop 98 new residential units within walking distance of existing bus lines and would also provide bicycle parking. This will allow easy access to transit to encourage ridership. The Project would provide opportunities for residents and visitors to use public transit for work trips and walk to other commercial businesses and services near the Project Site.</p>
<p>Goal 6: Protect the environment and health of our residents by improving air quality, and encouraging active transportation (e.g. bicycling and walking).</p>	<p>Consistent. As discussed in Section V.3, Air Quality, of the Sustainable Communities Environmental Analysis, the Project would result in a less than significant impact regarding air quality during construction and operation. The Project would develop new housing units within a Transit Priority Area. The Project Site's location near transit and proximity to services, retail stores, and employment opportunities</p>

⁴ http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.677%2C33.938%2C-118.243%2C34.037; Confirmed via correspondence with Ma'Ayn Johnson, AICP, Housing & Land Use Planner, SCAG, March 18, 2019.

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Goal	Project Consistency
	<p>promotes a pedestrian-friendly environment and health of residents.</p> <p>The location of the Project 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 provide 52 total bicycle spaces to promote travel by bicycle, thereby encouraging active transportation.</p>
<p>Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p>Consistent. The Project is located in an urban area, and would be a greater density than what currently exists on the Project Site. In addition, the Project Site is accessible to the transit. The Project would concentrate new development at a location that is served by bus lines, providing opportunities for residents and visitors to use public transit.</p>
<p>Chapter 5 Land Use Policies</p>	
<p>Identify regional strategic areas for infill and investment.</p>	<p>Consistent. The Project Site was one of many Affordable Housing Opportunity Sites (the “AHOS”) chosen by the City of Los Angeles to be redeveloped into affordable and supportive housing through a Request for Qualifications/Proposals (RFP) issued in 2016 by the Office of City Administrative Officer. Additionally, pursuant to California Government Code Section 65590 (4) (d) (Mello Act), “New housing developments constructed within the coastal zone shall, where feasible, provide housing units for persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code...In order to assist in providing new housing units, each local government shall offer density bonuses or other incentives, including, but not limited to, modification of zoning and subdivision requirements, accelerated processing of required applications, and the waiver of appropriate fees.”</p>
<p>Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more</p>	<p>Consistent. The Project would create infill development of new affordable and supportive multi-family housing units in a residential area well-served by existing transit routes, including</p>

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of the 2016-2040 RTP/SCS**

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effectively integrates land use planning and transportation investment.”	service by Big Blue Bus, LADOT Commuter Express, Metro, and Culver City Bus.
Develop “Complete Communities”.	Consistent: The Project would develop 98 multi-family affordable and supportive senior and family residential units, on a site that is surrounded on three sides by residential development. The Project would contribute to the diversity of land uses in the area, which currently includes commercial, residential, retail, and restaurant land uses within walking distance of the Project Site.
Plan for additional housing and jobs near transit.	Consistent. The Project would develop new affordable and supportive multi-family housing units in a residential area well-served by existing transit routes, including service by Big Blue Bus, LADOT Commuter Express, Metro, and Culver City Bus.
Plan for changing demand in types of housing.	Consistent. The Project would develop 98 residential units (one, two, and three bedroom units), all affordable with supportive services for seniors and families with risk of homelessness. This would create additional housing stock and would create 98 new housing opportunities for low-income families in an area underserved by affordable housing.
Continue to protect stable, existing single-family areas.	Consistent. The Project has been designed to be sensitive to and compatible with the existing residential neighborhoods surrounding the site. The Project provides a variety of architectural materials and building planes while employing a façade that intentionally transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to the east, with the smaller scale single-family homes of Oxford Triangle to the west and north.
Ensure adequate access to open space and preservation of habitat.	Consistent. The Project would require 10,800 square feet of open space pursuant to the LAMC based on the total number of units. The Project includes approximately 19,950 square feet of open space and residential amenities would be located in several distinct areas. The Project includes a 600 square-foot recreation room and a 600 square-foot outdoor recreation area, as well as 14,051 square feet of courtyards. The courtyards would include a resident garden, a playground, a fire pit, and

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	seating. The Project would also provide 4,700 square feet of private open space as balconies on 94 of the residential units.
<p><i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016; Table Source: EcoTierra Consulting, 2019.</i></p>	

The Project would be consistent with the applicable goals in the RTP/SCS. As demonstrated, the Project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2016-2040 RTP/SCS.

Criterion #2: The Project 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.

The Project would involve the development of 98 residential apartment units, 68 of which will be reserved for seniors provided in one three-story building and 30 units that will accommodate families provided in several one- and two-story buildings. The total proposed floor area is approximately 101,771 square feet. The Project is 100 percent residential and therefore meets Criterion #2.

Criterion #3: The Project provides a minimum net density of at least 20 units per acre.

The Project would develop 98 residential units on a lot comprising approximately 2.14 acres (93,278 square feet). The net density of the Project would be approximately 45.8 units per acre. The Project therefore meets Criterion #3.

Criterion #4: The Project is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

The Project Site is within a High Quality Transit Area HQTAs which are areas primarily around existing and planned transportation nodes designated in the 2016 RTP/SCS as defined by SCAG.⁵ SCAG defines an HQTAs as “areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. While HQTAs account for only three percent of total land area in SCAG region, they are planned and projected to accommodate 46 percent of the region’s future household growth and 55 percent of the future employment growth.”⁶ Specifically, Lincoln

⁵ http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.677%2C33.938%2C-118.243%2C34.037; Confirmed via correspondence with Ma’Ayn Johnson, AICP, Housing & Land Use Planner, SCAG, March 18, 2019.

⁶ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, page 8.

Boulevard, approximately 1,000 feet east of the Project Site, is served by The Santa Monica Big Blue Bus (Lines 3, R3 and 18) and the Culver City Bus (Lines 1, 2, 5, and 7).