

## Section 4. SCEA Criteria and Transit Priority Project Consistency Analysis

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### 4.1. Senate Bill 375

The State of California adopted SB 375, The Sustainable Communities and Climate Protection Act of 2008, which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate a “Sustainable Communities Strategy” into the regional transportation plans to achieve their respective region’s greenhouse gas emission reduction targets set by California Air Resources Board (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 (2016 RTP/SCS). For the SCAG region, the CARB has set greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The 2016 RTP/SCS outlines strategies to meet or exceed the targets set by CARB.<sup>20</sup>

### 4.2. Transit Priority Project Criteria

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

1. Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the ARB has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established by CARB;

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<sup>20</sup> *Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 7, 2016.*

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, the Proposed Project qualifies as a TPP and meets the qualifying criteria pursuant to Public Resources Code, Section §21155 as outlined above.

**Consistency with Criterion #1:**

***The Project is consistent with the general use designation, density, and building intensity and applicable policies of specified for the project area in either a sustainable communities strategy or an alternative planning strategy.***

In April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. On June 28, 2016, CARB accepted SCAG's quantification of GHG emission reductions from the 2016–2040 RTP/SCS and determined that the 2016–2040 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.<sup>21</sup>

**Use Designation, Density, and Building Intensity**

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban; compact; or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016-2040 RTP/SCS, pp. 20-21.) The SCAG 2016-2040 RTP/SCS, Sustainable Communities Strategy Background Documentation, Appendix (April 2016), forecasted LDCs by county and subregion for 2012 and 2040; Exhibit 13: Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion, and Exhibit 14: Forecasted Regional Development Types by Land

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<sup>21</sup> ARB Executive Order No. 16-066.

Development Categories (2040) - Los Angeles City Subregion are provided in Appendix L of this SCEA. The forecasted land use development patterns by LDCs

The 2016-2040 RTP/SCS utilizes a classification system, known as Land Development Categories (LDC). SCAG notes that the LDCs utilized in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016 RTP/SCS. The forecasted land use development patterns by LDCs shown on the aforementioned exhibits (provided in Appendix L) are based on Transportation Analysis Zone (“TAZ”) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts were not adopted as part of the 2016 RTP/SCS. However, these data may be used at the discretion of local agencies, which maintain their existing authority over local planning and land use decisions and will be solely responsible for determining consistency of any future project with the 2016 RTP/SCS.

The Project Site is located in the Urban LDC, which is the highest density and most intense land development category assessed in the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS describes the Urban Land Development Category as:

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

The Proposed Project would be consistent with the Urban LDC. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, in the Wilshire Community Plan area. The Proposed Project is an infill project that would provide affordable multi-family units and community serving ground floor case management and social services uses. As discussed above, due to the Proposed Project’s proximity to transit, it is located within a High-Quality Transit Area (HQTA). HQTA’s support transit opportunities and promotes a walkable environment. The Project Site is located within 500 feet of the Vermont/Beverly Rail Station, a Major Transit Stop. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid

pattern as is most of the City of Los Angeles. The predominant housing type in the Project Site area is multi-family residential. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

The 2016-2040 RTP/SCS further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Proposed Project is an affordable housing project, which includes a campus of five eight-story residential buildings with 454 residential dwelling units and 11,772 square feet of case management and social services spaces. The Proposed Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way as well as first floor courtyard spaces. The Proposed Project would provide limited parking for the supportive service and case management uses that is consistent with LAMC standards. Therefore, the Proposed Project is consistent with the expectations of developments within HQTAs.

The RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, research and development, industrial, civic and open space. (SCAG 2016-2040 RTP/SCS Background Documentation, p. 90, 'Place Types Categorized Into Land Development Categories (LDCs); SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, pp. 1-2).

'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 multi-family. The average total net FAR is 9.0, floors range from 15-100, and the gross density ranges from 0-50 employees per acre 75-500+ households per acre. (SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, p. 1.)

The Proposed Project is a residential development up to eight stories tall consisting of residential and support services uses in a highly-urbanized part of Los Angeles, on a site that is currently occupied by three commercial buildings, three single-family residential buildings, one office building, and one surface parking lot. Adjacent land uses include multi-family residential (including permanent supportive housing), office, commercial/retail, industrial uses, and surface parking. The Proposed Project's floor area is approximately 95 percent residential, and approximately 5 percent non-residential with a non-residential FAR of 0.13 to 1. The project area, generally consisting of a one-quarter mile radius, is supported by high levels of regional and local transit. The Proposed Project

would construct approximately 226 dwelling units per acre and will have a total net FAR of 2.8:1.

Based on the regional growth projections in the 2016-2040 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). SCAG’s population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table 4.1, below.

**Table 4.1  
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 Proposed Project is an infill development project within the Wilshire Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. As shown in Table 4.1, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City is Los Angeles is anticipated to increase by 364,800

households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

As discussed in Section 6.14, Population and Housing, the Proposed Project would result in an increase in approximately 564 net permanent residents in the City of Los Angeles.<sup>22</sup> The proposed increase in housing units and population would be consistent with SCAG's forecast of 364,800 additional households, approximately 763,900 persons, and 472,700 jobs in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment.

#### Applicable Policies Specified for the Project Area

The Proposed Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer to Section 6.14, Population and Housing, for a discussion on the Proposed Project's consistency with SCAG's population and housing growth. The Proposed Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS. Refer to Table 4.2 below for the Proposed Project's consistency analysis.

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<sup>22</sup> *The Proposed Project includes a Permanent Supportive Housing development to serve the target population and has programmed occupancy rates. As such, the citywide average population for multifamily housing of 2.6 persons per household is not applicable. The projected population density is based on 370 one-person occupancy units, 71 two-person occupancy units, and 13 four-person occupancy units.*

**Table 4.2  
Consistency Analysis with the  
2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

<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 SCAG and the City of Los Angeles and not does apply to the Proposed Project. No further discussion is required.
<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 within the City of Los Angeles within a HQTA. The Proposed Project would develop 454 dwelling units and 11,772 square feet of supportive space within 500 feet of the Vermont / Beverly Station and a Rapid Bus Stop, a Major Transit Stop. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and target population members with convenient access to public transit and opportunities for walking and biking. The Proposed Project would also provide a a turn-a-bout driveway on Madison Avenue to facilitate access for busses and para-transit vehicles. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
<b>2016-2040 RTP/SCS Goal 3</b> Ensure travel safety and reliability for all people and goods in the region.	<b>Consistent.</b> The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor landscaping to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project would provide 251 bicycle spaces to promote travel by bicycle. Furthermore, the Proposed Project would be subject to the site plan review requirements of the City of Los Angeles and work 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.
<b>2016-2040 RTP/SCS Goal 4</b> Preserve and ensure a sustainable regional transportation system.	<b>Not Applicable.</b> This goal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. No further discussion is required.
<b>2016-2040 RTP/SCS Goal 5</b> Maximize the productivity of our transportation system.	<b>Consistent.</b> The Proposed Project would place 454 residential dwelling units and 11,772 square feet of supportive service area within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station. Given the Proposed Project's location close to transit, the Proposed Project will encourage the utilization of transit as a mode of transportation to and from the project area. Additionally, the Proposed Project will include a turn-a-bout driveway on Madison Avenue to facilitate paratransit vehicles. Thus, the Proposed Project will contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. Moreover, as discussed in the Proposed Project's Transportation Study (located in

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Goals and Policies	Consistency Assessment
	Appendix I of this SCEA), the Proposed Project would not create a significant impact at any of the study intersections. Additionally, as discussed in the Traffic Study, the Proposed Project would not create a significant impact at any CMP monitoring location. Therefore, the Proposed Project is consistent with this Goal.
<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 Proposed Project is designed to active transportation. The Proposed Project would place dwelling units and ground-floor supportive space within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station. The Project Site’s location near mass transit and proximity to services, retail stores, and employment opportunities promotes public transit over vehicle use, and the streetscape improvements and pedestrian scaled landscaping create a pedestrian-friendly environment. The location and design of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle. Thus, the Proposed Project is designed to reduce vehicle-miles-traveled and help improve air quality. Furthermore, the Proposed Project would comply with LAMC Section 99.05.504.5.3 of the LAMC, which requires mechanically ventilated buildings located within 1,000 feet of a freeway to provide air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value (MERV) of 13. The Proposed Project residential and service uses would be subject to the MERV standards of LAMC Section 99.05.504.5.3. As such, adherence to the LAMC and incorporation of project design features would ensure Project consistency with Freeway Advisory Notice (ZI-2427) and would serve to improve indoor air quality. Therefore, the Proposed Project is consistent with this Goal.</p>
<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 Proposed Project would comply with the L.A. Green Building Code, the California Green Building Code, and include requirements for a green or high albedo roof and that at least five percent of all parking spaces on-site shall be capable of supporting future electric vehicle (EV) charging stations. It also provides approximately 5,780 square feet of solar panels installed. Further, the L.A. Green Building Code requires the use of numerous conservation</p>



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**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

Goals and Policies	Consistency Assessment
	measures, beyond those required by Title 24 of the California Code of Regulations. Therefore, the Proposed Project is consistent with this Goal.
<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> As stated above, the Project Site is located in a highly urbanized area near downtown Los Angeles within 500 feet of a Major Transit Stop, the Vermont / Beverly Rail Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and patrons with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units near mass transit and in close proximity to services, retail stores, and employment opportunities. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.</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 development projects and no further discussion is required.</p>
<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 Proposed Project would contribute to a safe, well maintained, and efficient multi-modal transportation system. The Proposed Project would provide landscaping along the public right-of-way and active ground floor uses, which promotes and supports pedestrian activity in the area. As discussed in the Proposed Project's Traffic Study (located in Appendix I of this SCEA), the Proposed Project would not create a significant impact at any of the study intersections. Additionally, the Proposed 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</p>	<p><b>Not Applicable.</b> This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project. The Proposed Project would</p>

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<b>Goals and Policies</b>	<b>Consistency Assessment</b>
respect local input and advance smart growth initiatives.	develop 454 dwelling units and 11,772 square feet of resident service area within 500 feet of a Major Transit Stop. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project would advance smart growth by increasing residential uses in transit-rich areas near services, retail, and employment opportunities.
<b>2016-2040 RTP/SCS Guiding Policy 4</b> Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	<b>Not Applicable.</b> This policy is directed towards transportation investment by SCAG. However, the Proposed Project would support active transportation. Nonetheless, the Proposed Project will promote active transportation. The Project Site is located within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and patrons with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units near mass transit and in close proximity to services, retail stores, and employment opportunities. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle.
<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.	<b>Not Applicable.</b> This policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. No further discussion is required.
<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.	<b>Not Applicable.</b> This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Proposed Project is located within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station, and provides only 23 parking spaces. As such, the Proposed Project would support public transportation and other alternative methods of transportation (e.g., walking and biking).
<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	<b>Not Applicable.</b> This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments. No further discussion is required.

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Goals and Policies	Consistency Assessment
efficient transportation system and sustainable outcomes in the long run.	
<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.	<b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project. No further discussion is required.
<b>2016-2040 RTP/SCS Land Use Policy 1</b> Identify regional strategic areas for infill and investment.	<b>Not Applicable.</b> This policy is directed towards SCAG to identify regional strategic areas. No further discussion is required.
<b>2016-2040 RTP/SCS Land Use Policy 2</b> Structure the plan on a three-tiered system of centers development. <sup>23</sup>	<b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and not does apply to the Proposed Project. No further discussion is required.
<b>2016-2040 RTP/SCS Land Use Policy 3</b> Develop “Complete Communities.”	<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>24</sup></p> <p>As stated above, the Proposed Project would place dwelling units 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. The Proposed Project would also improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle. Therefore, the Proposed Project would be consistent with the SCAG’s goals of increasing residential uses in transit-rich areas near services, retail, and employment</p>

<sup>23</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.*

<sup>24</sup> *SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).*

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	opportunities to reduce vehicles-miles-traveled. Therefore, the Proposed Project is consistent with this policy.
<b>2016-2040 RTP/SCS Land Use Policy 4</b> Develop nodes on a corridor.	<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. No further discussion is required.
<b>2016-2040 RTP/SCS Land Use Policy 5</b> Plan for additional housing and jobs near transit.	<b>Consistent.</b> As stated above, the Proposed Project would place 454 dwelling units within 500 feet of a Major Transit Stop, the Vermont/Beverly Rail Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location would promote the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Proposed Project is consistent with this policy
<b>2016-2040 RTP/SCS Land Use Policy 6</b> Plan for changing demand in types of housing.	<b>Consistent.</b> The Proposed Project would increase the housing stock in Los Angeles by providing safe, attractive, and centrally located studios, one-bedroom, and two-bedroom residential dwelling units. The proposed residential units would be available to Extremely Low Income to Low Income households. Thus, the Proposed Project is contributing to the range of housing choices in both size and affordability available in the Wilshire community and is therefore consistent with this goal.
<b>2016-2040 RTP/SCS Land Use Policy 7</b> Continue to protect stable, existing single-family areas.	<b>Consistent.</b> The Proposed Project would not demolish any existing single-family homes. Three multi-family residential units would be displaced by the Proposed project; however, these units are entirely surrounded by limited manufacturing and office uses and are not within an established single-family area. Additionally, the Project would provide a total of 454 permanent supportive housing units resulting in a net increase of housing. Therefore, the Proposed Project is consistent with this policy.
<b>2016-2040 RTP/SCS Land Use Policy 8</b> Ensure adequate access to open space and preservation of habitat.	<b>Consistent.</b> The Proposed Project is located within an urbanized area within the City of Los Angeles. Development of the Proposed Project would not remove any existing open space areas or habitat, since the Project Site is fully developed with three commercial buildings, three single-family residential buildings, and one surface parking lot. The Proposed Project would provide 36,580 square feet of open space that equals the required amount pursuant to the LAMC, utilizing a 20 percent reduction per the SNAP. Therefore, the Proposed Project is consistent with this policy.

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<b>2016-2040 RTP/SCS Land Use Policy 9</b> Incorporate local input and feedback on future growth.	<b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and not does apply to the Proposed Project. No further discussion is required.
<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 pedestrian improvements, and efficient transportation infrastructure.	<b>Consistent.</b> The Proposed Project will provide multi-family housing to an existing, transit-accessible area. The Proposed Project would provide a variety of dwelling unit sizes including studio, one-bedroom, and two-bedroom units that accommodate a range of households. In addition, the Proposed Project will provide bicycle parking and various pedestrian-oriented improvements, including improved sidewalks. Therefore, the Proposed Project is consistent with this policy.
<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> This benefit is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<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 Proposed Project includes numerous energy-efficient design features, such as ENERGY STAR-rated appliances. It would comply with the City of Los Angeles Green Building Code, the California Green Building Code, and includes requirements for a green or high albedo roof and that at least five percent of all parking spaces on-site be capable of future electric vehicle (EV) charging stations and approximately 5,780 square feet of solar panels. The Proposed Project's incorporation of bicycle-and pedestrian-friendly elements and location near various bus lines will provide future residents with various affordable transportation options. Therefore, the Proposed Project is consistent with this benefit.
<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 Proposed Project will encourage improved access and mobility by providing residential uses with access to various transit options, which will encourage the use of existing and proposed mass transit. The Proposed Project also includes 36,580 square feet of open space including ground level courtyards as well as community rooms. Recreational amenities would include building lobbies, computer rooms, fitness rooms, and community rooms. These areas provide the opportunity for Project residents and visitors to gather.
<i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.</i>	

### **Consistency with Criterion #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.***

The Proposed Project includes the construction, operation, and maintenance of a total floor area of 247,812 square feet of floor area with 454 dwelling units. The Proposed Project includes resident supportive service space (which encompasses approximately 11,772 square feet of social services and case management uses) representing 4.7 percent of the total proposed floor area. As such, approximately 95 percent of the Proposed Project's floor area is dedicated to residential. Therefore, the Project would be consistent with this Criterion.

### **Consistency with Criterion #3**

***Provides a minimum net density of at least 20 units per acre.***

The Project Site has a buildable area of approximately 2.01 acres. The Proposed Project includes 454 dwelling units and therefore provides approximately 226 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

### **Consistency with Criterion #4**

***Is within one-half mile of a Major Transit Stop or High-Quality Transit Corridor included in a regional transportation plan.***

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 a "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.

Project Site is located approximately 500 feet of the intersection of Vermont and Beverly, which provides access to Vermont/Beverly Rail Station, a major transit stop that provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, as well as numerous

buses routes. The bus lines within approximately one-quarter mile of the Project include Metropolitan Transit Authority (Metro) Rapid 780 and Metro Local Lines , 10, 14, 201, 204, 754. The LADOT DASH line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1<sup>st</sup> Street. The Project Site is also located within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less along Vermont Avenue, Beverly Boulevard, Melrose Avenue, and W. First Street. Because the Vermont/Beverly Rail Station and numerous bus stops qualify as Major Transit Stop and High Quality Transit Corridor that are within one-half mile of the Project Site, the Proposed Project is consistent with this Criterion.

### 4.3 SB 375 Streamlining Benefits

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

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

PRC Section 21159.28 states that a residential project that is consistent with the use designation, density, building intensity, and applicable policies specified for the project area pursuant to the regional RTP/SCS shall not be required to reference, describe, or discuss (1) growth inducing impacts; or (2) any project specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network.

As such, the streamlining benefits for the Proposed Project include:

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

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

## 4.4 Scope of Analysis

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

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