

# Attachment C

## SCEA Criteria and TPP Consistency Analysis

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### 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 (ARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the Project Site.

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

### 2 Consistency with Transit Priority Project Criteria

As discussed in **Section 1, Introduction**, a Sustainable Communities Environmental Assessment (SCEA) may be prepared for a project that (a) is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy (see California Public Resources Code Section 21155(a) and (b) is a Transit Priority Project (TPP) (as defined in California Public Resources Code Section 21155(b)). As further described below, the Project meets these criteria and thus, is eligible for certain CEQA streamlining benefits by way of preparing a SCEA for purposes of clearance under the California Environmental Quality Act (CEQA).

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an

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<sup>1</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 7, 2016.

alternative planning strategy, for which the California Air Resources Board (CARB) 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;

2. A TPP is a project that meets the following criteria:
  - a. 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;
  - b. Provides a minimum net density of at least 20 units per acre; and
  - c. Is located within one-half mile of a major transit stop (as defined in Government Code Section 21064.3) or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

## **2.1 Consistency with Criteria #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.**

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

On April 7, 2016, SCAG, the metropolitan planning organization for the Project area, adopted the “sustainable communities strategy” referred SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).

The Project is consistent with the general land use designation, density, and building intensity in the SCAG 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS balances Southern California’s regional future mobility and housing needs with economic, environmental and public health goals. For the SCAG region, CARB has set greenhouse gas reduction targets to eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. 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 and thus, met the criteria to be a sustainable communities strategy.

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.)

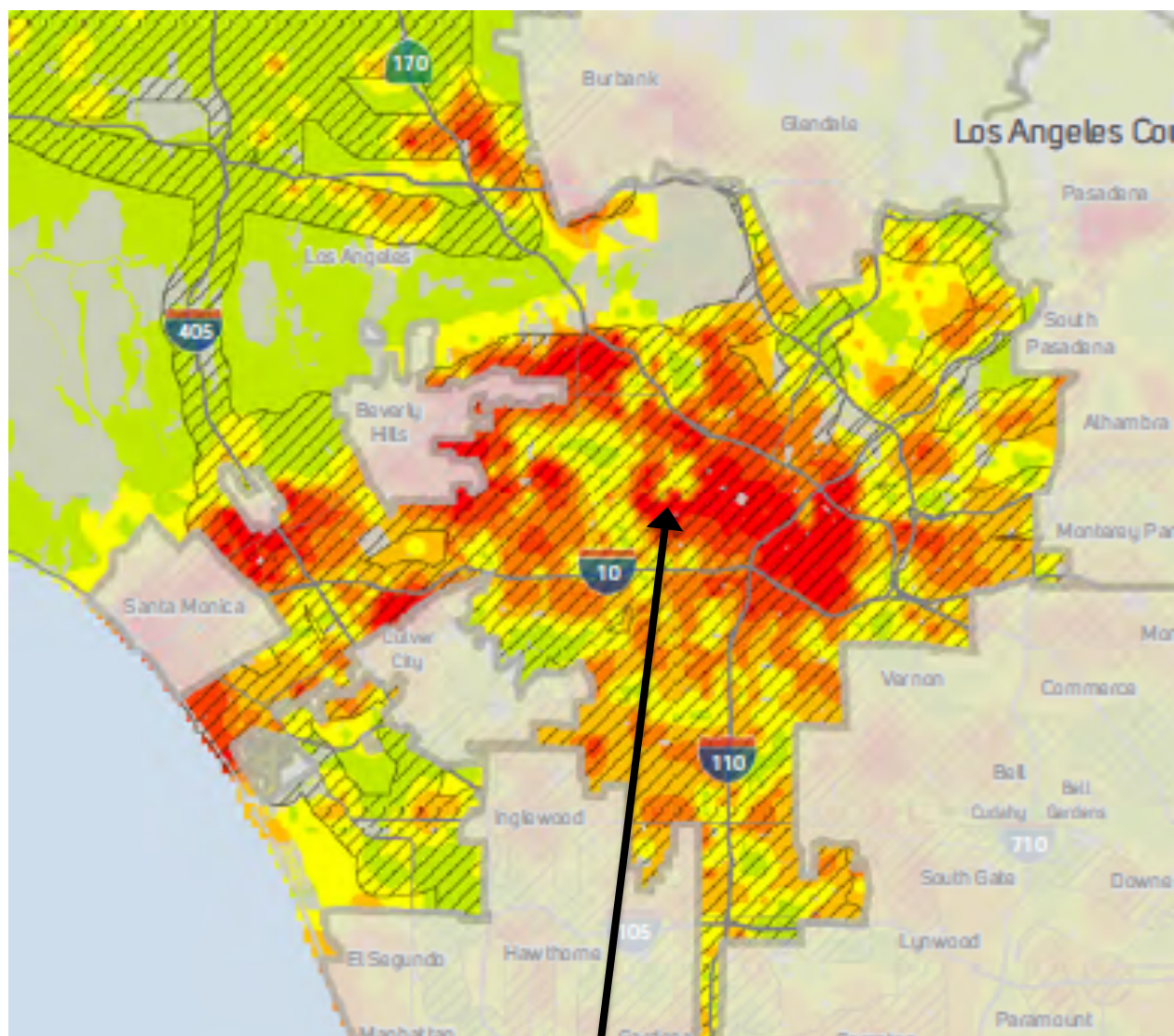
SCAG notes that the LDCs utilized in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016 RTP/SCS. The forecasted land use development patterns by LDCs shown on the aforementioned exhibits 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 an area that is 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 C-1** and **Figure C-2**).

The 2016-2040 RTP/SCS (p. 20) describes the Urban LDC as follows:

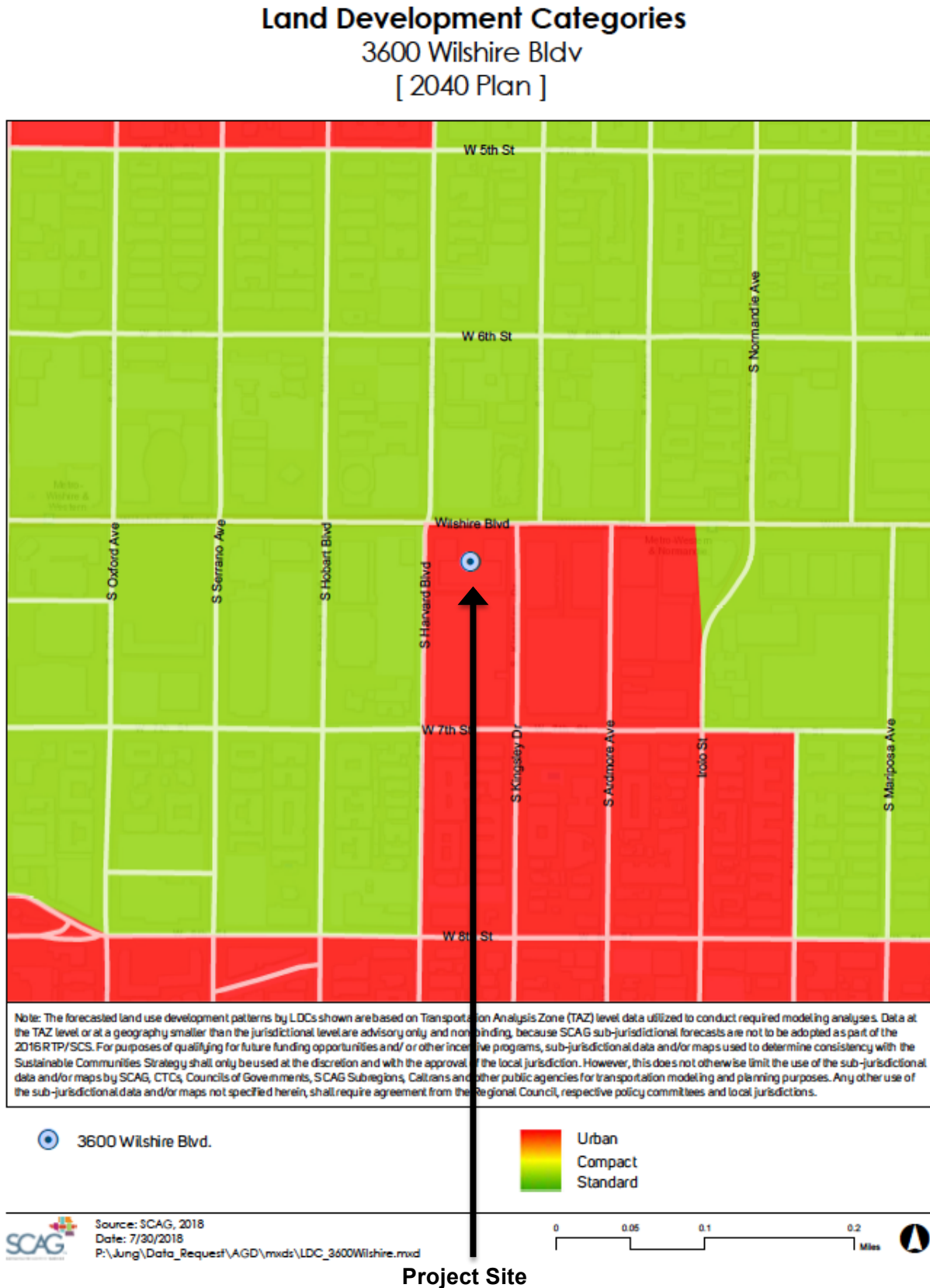
*These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and 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 C-1, Forecasted Regional Development Types by Land Development Categories (2040)  
- Los Angeles City Subregion



Project Site

Figure C-2, Project Area map



The Project would be consistent with the Urban Land Use Development Category. The Project is located within a highly urbanized area within the City of Los Angeles, along the Wilshire Corridor in the Koreatown community that is developed by a mix of land uses. The Project would provide a mixed-use development with multi-family units, together with project- and neighborhood-serving retail uses. The Project is well-served by bus and rail lines and located within a High Quality Transit Area (HQTAs) as defined by SCAG and a Transit Priority Area as defined by SB 743, each of which support transit opportunities and promote a walkable environment.<sup>2</sup>

The Project Site is approximately 1.65 miles north of the Santa Monica (I-10) Freeway, approximately 1.75 miles south of the Hollywood (US-101) Freeway, and approximately 2.5 miles west of the Harbor (I-110) Freeway.

Wilshire and Normandie Avenue provide local access.

LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Harvard. The Metro Purple Line subway has a station stop at Wilshire and Normandie, approximately 560 feet from the Project Site.

Ridership information for public transit near the Project Site is shown on **Table C-1**.

**Table C-1**  
**Average Daily Public Transit Ridership Near the Project Site**

<b>Local Lines</b>	<b>Weekday</b>	<b>Saturday</b>	<b>Sunday</b>
20	12,492	6,867	5,337
Purple Line	137,142	81,837	70,250
Year 2018, Annual			
Foothill Transit is not included since it is a separate organization than Metro.			
The Purple Line ridership is included in the Red Line.			
Source: Metro, <a href="http://isotp.metro.net/MetroRidership/Index.aspx">http://isotp.metro.net/MetroRidership/Index.aspx</a> , February 15, 2019.			

The 2016-2040 RTP/SCS states that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Project is a high-density mixed-use residential, commercial, and office project with 760 residential units and ground floor retail uses. The Project promotes pedestrian and bicycling activity by provided ground floor commercial space, streetscape improvements, and over 1,600 short and long-term bicycle parking spaces for Project occupants and visitors, and takes advantage of reduced parking through the provision of additional bicycle parking. Accordingly, the Project is fully consistent with the 2016-2040 RTP/SCS's characterization of HQTAs.

The 2016-2040 RTP/SCS includes 35 urban footprint Place Types for modeling purposes, including mixed use, residential, commercial, office, research and development, industrial, civic, and open space.<sup>3</sup> The Project is consistent with a range of Place Types within the urban land

<sup>2</sup> SCAG, High Quality Transit Areas 2012 – SCAG Region, [http://gisdata-scac.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3\\_0](http://gisdata-scac.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0), accessed on June 14, 2018.

<sup>3</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). Refer to Appendix C; 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).



development category.

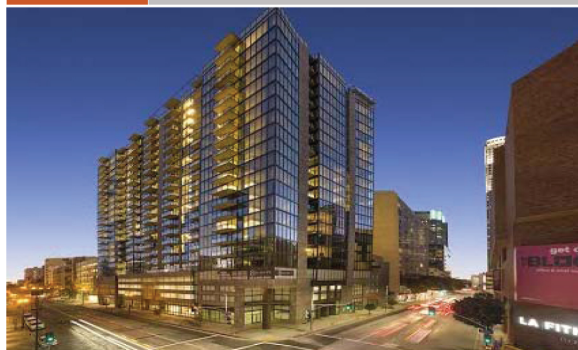
, The Urban Mixed-Use and Urban Residential footprints are characterized as the following:

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

<sup>4</sup> SCAG 2016-2040 RTP/SCS Background Documentation, Urban Footprint Place Types, [http://scagtrpscs.net/documents/2016/supplemental/UrbanFootprint\\_PlaceTypesSummary.pdf](http://scagtrpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf). Refer to Appendix C; see also Place Types Categorized into Land Development Categories, available at: [http://scagtrpscs.net/Documents/2016/supplemental/LDC\\_PlaceType.pdf](http://scagtrpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf).

## Urban Residential



### Land Use Mix

*Residential* **64%**  
*Employment* **4%**  
*Mixed Use* **12%**  
*Open Space/Civic* **21%**

### Residential Mix

*SF Large Lot* **0%**  
*SF Small Lot* **0%**  
*Townhome* **0%**  
*Multi-Family* **100%**

### Built Environment

*Intersections per mile* **200**  
*Average Floors* **18**  
*Floors Range* **5 – 60**  
*Total Net FAR* **9.0**

### Employment Mix

*Office* **22%**  
*Retail* **78%**  
*Industrial* **0%**

### Gross Density Range (per acre)

*Household* **75-500+**  
*Employee* **0-50+**

### Average Density (per acre)

*Household* **131**  
*Employee* **44**

The most intense residential-focused type, Urban Residential areas are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking 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 the Urban Residential 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>

The Project is a mixed-use development consisting of residential and commercial land uses in a highly urbanized part of Los Angeles, along the dense Wilshire Corridor in the Koreatown community. The land uses within the general vicinity of the Project Site are characterized by a mix of high and medium-intensity residential, commercial, and office buildings, which vary widely in building style and period of construction.

The Project includes 760 residential units and is approximately 60 percent residential<sup>6</sup>, and the housing consists entirely of multi-family residential dwelling units.

The density of the Project would be 190 residential dwelling units per acre (760 units on 4.0 acres).

The existing office floor area of 385,520 square feet would remain. The Project would include 660,050 square feet. The total proposed FAR would be 6:1.

Accordingly, the Project is consistent with the general use designation, density, building intensity, and applicable policies specified for the area of the Project Site in the SCAG 2016-

<sup>5</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). Refer to Appendix C; 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>6</sup> 630,527 sf residential / 1,045,650 sf total = 0.60



## 2040 RTP/SCS.

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 C-2**.

**Table C-2**  
**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%
Source: SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.			

The 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 the above table, 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 of Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Based on the City's current household demographics (e.g., an average of 2.43 persons per multi-family household), the construction of 760 additional residential dwelling units would result in an increase in approximately 1,847 net permanent residents in the City of Los Angeles.

Further, the Project includes a total of 15,000 square feet of ground-floor commercial space. The Project would generate approximately 72 employees. The proposed increase in housing units, population, and employment would be consistent with SCAG's forecast of 364,800 additional households, approximately 763,900 persons, and 472,700 jobs in the City of Los Angeles between 2012 and 2040. As such, the 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 Project occupancy/buildout or that would result in an adverse physical change in the environment.

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

As set forth above, 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 to **Attachment B, Environmental Impact Analysis, Checklist Topic 11, Population and Housing**, for a further discussion on the Project's consistency with SCAG's population and housing growth projections.) Additionally, as discussed below in **Table C-3**, the Project would be consistent with applicable goals and policies of SCAG's 2016-2040 RTP/SCS.

**Table C-3**  
**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 SCAG and the City of Los Angeles (City) 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.	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area in the City. The Project would develop 760 residential dwelling units and approximately 6,359 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743.</p> <p>The Project Site is served by a number of transit options that include the LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Harvard. In addition, the Metro Purple Line subway has a station stop at Wilshire and Normandie, approximately 560 feet from the Project Site. As such, the Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for biking and walking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.</p> <p>The Project also would contribute to the economy by creating new businesses, jobs, and sales tax revenue.</p>
<b>2016-2040 RTP/SCS Goal 3</b> Ensure travel safety and reliability for all people and goods in the region.	<p><b>Consistent.</b> Though not necessarily applicable on a project-specific basis, the Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site.</p> <p>In addition, the Project would provide over 1,600 bicycle spaces. 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</p>

**Table C-3**  
**Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	<p>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. As such, the Project supports this goal.</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>7</sup></p> <p>Nevertheless, the Project would contribute to achieving this goal. The Project would not create a significant impact at any of the study intersections.</p> <p>As discussed in the Project's Traffic Study, the Project did not meet or exceed any of the four thresholds defined in the Freeway Impact Analysis Agreement executed between Caltrans and Los Angeles Department of Transportation (LADOT) in December 2015.</p> <p>The Project would not create a significant impact at any CMP monitoring location.</p> <p>The Project would minimize impacts on the existing roadway system by placing housing near jobs and transit and providing ample bicycle parking and bicycle and pedestrian infrastructure to dis-incentivize automobile use and encourage biking and walking. The Project also encourages transit use through the Project Site's location near existing transit, thereby contributing to ridership and sustainability of the multimodal transportation system in the region.</p>
<p><b>2016-2040 RTP/SCS Goal 5</b> Maximize the productivity of our transportation system.</p>	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area in the City. The Project would develop 760 residential dwelling units and approximately 6,359 square feet of commercial land uses within an HQT, as defined by SCAG, and a transit priority area as defined by SB 743.</p> <p>LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Harvard. Metro Purple Line subway has a station stop at Wilshire and Normandie, approximately 560 feet from the Project Site.</p>

<sup>7</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).

**Table C-3**  
**Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	<p>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.</p> <p>The Project would not create a significant impact at any of the study intersections.</p> <p>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> As discussed in Air Quality, the Project would result in a less than significant impact regarding air quality during construction and operation. The Project would remove a parking structure and construct dense housing near jobs and transit. Removal of the parking structure would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality.</p> <p>The Project would be built to the current building codes that require sustainability measures such as low flow fixtures and efficient energy systems.</p> <p>The Project also would activate the sidewalks at the Project Site by incorporating street-level retail uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking, and transit use.</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 Project would meet the requirements of the City's Green Building Code and the California Green Building Code.</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 within a HQTa and a TPA.</p> <p>The Project Site is located in a highly urbanized area in the City. The Project would develop 760 residential dwelling units and approximately 6,359 square feet of commercial land uses within an HQTa, as defined by SCAG, and a transit priority area as defined by SB 743.</p> <p>LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Harvard. Metro Purple Line subway has a station stop at Wilshire and Normandie, approximately 560 feet from the Project Site.</p> <p>Moreover, the location of the Project Site promotes the use of a variety of transportation options and access, which includes walking and the use of public transportation.</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></p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG in</p>

**Table C-3**  
**Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	allocating transportation investments. This goal does not apply to the individual development projects and no further analysis is required.
<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.	<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 rights-of-way and active ground-floor uses, which promotes and supports pedestrian activity in the area.  The Project would not create a significant impact at any of the study intersections.  The Project would not create a significant impact at any CMP monitoring location.
<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.	<b>Not Applicable.</b> This Goal is directed towards SCAG and the City and not does apply to the Project.
<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 Project would support active transportation (e.g. walking and bicycling) by providing landscaping along the public rights-of-way and active ground floor uses, which promotes and supports pedestrian activity in the area. Additionally, the Project Site's location within an HQTAs promotes the use of public transit and pedestrian activity.
<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 high occupancy vehicles (HOV), transit and rideshare. Although this policy is not applicable to the Project, the Project Site's location in an HQTAs promotes the use of public transit and pedestrian activity.
<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 Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Project Site is located within an 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).
<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.	<b>Not Applicable.</b> This policy is directed towards SCAG transportation projects to encourage and support transportation investments.
<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 governmental agencies to encourage and support transportation investments, and not does apply to the Project.
<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. Nevertheless, the Project is an infill development in an HQTAs (defined by SCAG) and

**Table C-3**  
**Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	within a transit priority area (as defined by SB 743).
<b>2016-2040 RTP/SCS Land Use Policy 2</b> Structure the plan on a three-tiered system of centers development. <sup>8</sup>	<b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and not does apply to the Project. Nevertheless, the Project is located in an “existing” center where existing transportation infrastructure exists to support the proposed density of the Project.
<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 encourage 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 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>9</sup></p> <p>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 to reduce vehicles-per-miles traveled.</p>
<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. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. The Project is located within an HQTa and a transit priority area. The Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities.
<b>2016-2040 RTP/SCS Land Use Policy 5</b> Plan for additional housing and jobs near transit.	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area in the City within a HQTa and a TPA.</p> <p>The Project Site is located in a highly urbanized area in the City. The Project would develop 760 residential dwelling units and approximately 6,359 square feet of commercial land uses within an HQTa, as defined by SCAG, and a transit priority area as defined by SB 743. The Project Site is located near a variety of transit options including the LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Harvard. Metro Purple Line subway has a station stop at Wilshire and Normandie, approximately 560 feet from the Project Site. Thus, the Project promotes the use of a variety of transportation options walking, biking, and the use of public</p>

<sup>8</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>9</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).



**Table C-3**  
**Consistency with SCAG's 2016-2040 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
	transportation.
<b>2016-2040 RTP/SCS Land Use Policy 6</b> Plan for changing demand in types of housing.	<b>Consistent.</b> The Project includes 760 apartment units (133 studio units, 475 1-bedroom, and 152 2-bedroom units), which provides a variety of housing sizes.
<b>2016-2040 RTP/SCS Land Use Policy 7</b> Continue to protect stable, existing single-family areas.	<b>Consistent.</b> The Project Site would not demolish any single-family zones, is not located on or near, and would not displace, any existing single-family residential neighborhoods. The Project provides housing in the City on an infill lot that is designated for high density housing and commercial uses
<b>2016-2040 RTP/SCS Land Use Policy 8</b> Ensure adequate access to open space and preservation of habitat.	<b>Consistent.</b> The Project Site 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 approximately 79,800 square feet of open space.
<b>2016-2040 RTP/SCS Land Use Policy 9</b> Incorporate local input and feedback on future growth.	<b>Not Applicable/Consistent.</b> This Land Use Policy is directed towards SCAG and does not necessarily apply to the Project. Regardless, the purpose of the Project is to respond to the City's need to serve and accommodate an existing homeless population.
<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.	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area in the City within a HQTa and a TPA.</p> <p>The Project Site is located in a highly urbanized area in the City. The Project would develop 760 residential dwelling units and approximately 6,359 square feet of commercial land uses within an HQTa, as defined by SCAG, and a transit priority area as defined by SB 743.</p> <p>LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Harvard. Metro Purple Line subway has a station stop at Wilshire and Normandie, approximately 560 feet from the Project Site.</p>
<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 an HQTa, 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.	<p><b>Consistent.</b> The Project includes numerous energy-efficient design features, such as ENERGY STAR-rated appliances and electric vehicle supply equipment. It will comply with the City of Los Angeles Green Building Code and the California Green Building Code, which provide provisions for energy and water conservation.</p> <p>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.</p>
<b>2016 RTP/SCS Benefit 4:</b> Improved	<b>Consistent.</b> The Project would remove a parking structure

**Table C-3**  
**Consistency with SCAG's 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
<p>placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.</p>	<p>and construct dense housing near jobs and transit. Removal of the parking structure would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality.</p> <p>The Project would be built to the current building codes that require sustainability measures such as low flow fixtures and efficient energy systems.</p> <p>Open space areas and trees would improve air quality.</p> <p>The Project also would activate the sidewalks at the Project Site by incorporating street-level retail uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking, and transit use.</p>
Source: SCAG, 2016-2040 RTP/SCS, April 2016.	

The Project contains approximately 60 percent residential use of the total floor area for the Site with the existing office building to remain.<sup>10</sup> As such, the Project would be consistent with this Criterion.

## 2.2 Consistency with Criterion #2(a)

**The Project contains at least 50 percent residential use.**

Upon completion, the Project's new buildings would contain 660,040 square feet of floor area. The residential floor area of the South Tower would be 293,446 square feet and the West Tower would be 337,081 square feet for a total of 630,527 square feet. With the addition of the retail space, residential gym and other amenity spaces, the total new floor area is 660,040 square feet. Combined with the commercial office building to remain that contains 385,000 square feet of floor area, the Site would contain 1,045,560 square feet of floor area.

The Project contains approximately 60 percent residential use of the total floor area for the Site with the existing office building to remain.<sup>11</sup> As such, the Project would be consistent with this Criterion.

## 2.3 Consistency with Criterion #2(b)

**The Project includes a minimum net density of at least 20 units per acre.**

The density of the Project would be 190 residential dwelling units per acre (760 units on 4.0 acres). As such, the Project would be consistent with this Criterion.

<sup>10</sup> 630,527 sf residential / 1,045,650 sf total = 0.60

<sup>11</sup> 630,527 sf residential / 1,045,650 sf total = 0.60

## 2.4 Consistency with Criterion #2(c)

***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. In the case of bus stops, this always requires an intersection of two bus routes. An intersection of two bus lines is defined as the midpoint of the street intersection where two or more eligible bus routes meet or cross, and passengers have the direct ability to transfer on foot. This does not include bus routes that travel along the same street.

The Project Site is within approximately 675 feet west the intersection of Wilshire Boulevard and Normandie Avenue, which provides access to the Metro Purple Line Wilshire and Normandie Station, (which is a major transit stop), Metro Rapid 720, and Metro Line 20. See **Table C-4, Transit Priority Analysis**.

**Table C-4  
Transit Priority Analysis**

Transit Priority Analysis					
Line	Direction	# Trips	Total Trips	Average Frequency	Qualifies?
Metro Purple Line	Eastbound	Every 10 minutes	Every 10 minutes		Yes
		Every 10 minutes	Every 10 minutes		
	Westbound	Every 10 minutes	Every 10 minutes		
		Every 10 minutes	Every 10 minutes		
Metro 20	Eastbound	13 AM Peak Hours trips	38	11.05 minutes	Yes
		25 PM Peak Hours trips			
	Westbound	17 AM Peak Hours trips	37	11.35 minutes	
		20 PM Peak Hours trips			
Metro 720	Eastbound	14 AM Peak Hours trips	41	10.2 minutes	Yes
		27 PM Peak Hours trips			
	Westbound	27 AM Peak Hours trips	41	10.2 minutes	
		14 PM Peak Hours trips			
<p>Peak Periods are considered to be between 6:00 to 9:00 AM (180 minutes) and 3:00 to 7:00 PM (240 minutes) for a total of 420 minutes. Bus routes must have a service frequency of 15 minutes or less for the entire duration of the peak hour periods.</p> <p>To determine the eligibility of the bus line, the average number of minutes per trip for each direction is calculated separately. If one or both directions fail to meet the 15 minute frequency limit, the entire bus line is ineligible for a Major Transit Stop.</p> <p>The total number of trips from the point of origin during peak hours (Monday to Friday) is used. A trip is included if its median time falls within the peak hour.</p> <p>To calculate the median time, the time at trip origin is subtracted from the time at arrival at final</p>					

station, divided by two, and then added to origin time.

The total peak hour time (420 minutes) is then divide by the number of trips for the average number of minutes per trip.

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Moreover, the Project is located within a high-quality transit corridor.

As such, the Project is consistent with this Criterion.