

## Section 3. SCEA Criteria and Transit Priority Project Consistency Analysis

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### A. Senate Bill 375

The State of California adopted SB 375, also known as “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 September 3, 2020, SCAG’s Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a plan that the Regional Council now calls Connect SoCal. For the SCAG region, the CARB has set greenhouse gas reduction targets at 8 percent below 2005 per capita emissions level by 2020 and 19 percent below 2005 per capita emissions levels by 2035. The Connect SoCal plan outlines strategies to meet the targets set by CARB.<sup>1</sup> By Executive Order G-20-239, approved October 30, 2020, CARB officially determined that the Connect SoCal plan would achieve CARB’s 2020 and 2035 GHG emission reduction targets.<sup>2</sup>

### B. Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to a transit priority project (TPP). 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 ARB;

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<sup>1</sup> Southern California Association of Governments, *Connect SoCal, 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy, Chapter 1: About the Plan*, September 3, 2020.

<sup>2</sup> CARB Executive Order No. G-20-239.

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.***

*2016-2040 RTP/SCS*

The 2016-2040 RTP/SCS contains SCAG's regional growth projections, goals, and policies, as well as a regional overview of projected land uses and development standards. Using data collected from local jurisdictions, including general plans, SCAG categorized existing land uses into land use types, then combined the land use types into 35 Place Types and classified subregions into one of three land use development categories (LDCs): Urban, Compact, or Standard. SCAG used these LDCs to describe the conditions that exist and/or are likely to exist within each specific area of the SCAG region<sup>3</sup>. As shown below in Figure 3.1, Forecasted Regional Development Types by Land Development Categories (2012) and Figure 3.2, Forecasted Regional Development Types by Land Development Categories (2040), the Project Site is located within an "Urban" LDC and is forecasted to be in within an Urban LDC in 2040, respectively. Urban LDCs are often found within or directly adjacent to moderate and high-density urban areas. The 2016-2040 RTP/SCS defines the Urban LDC as the following:

*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.*

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<sup>3</sup> 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, 2016, p. 20-21.

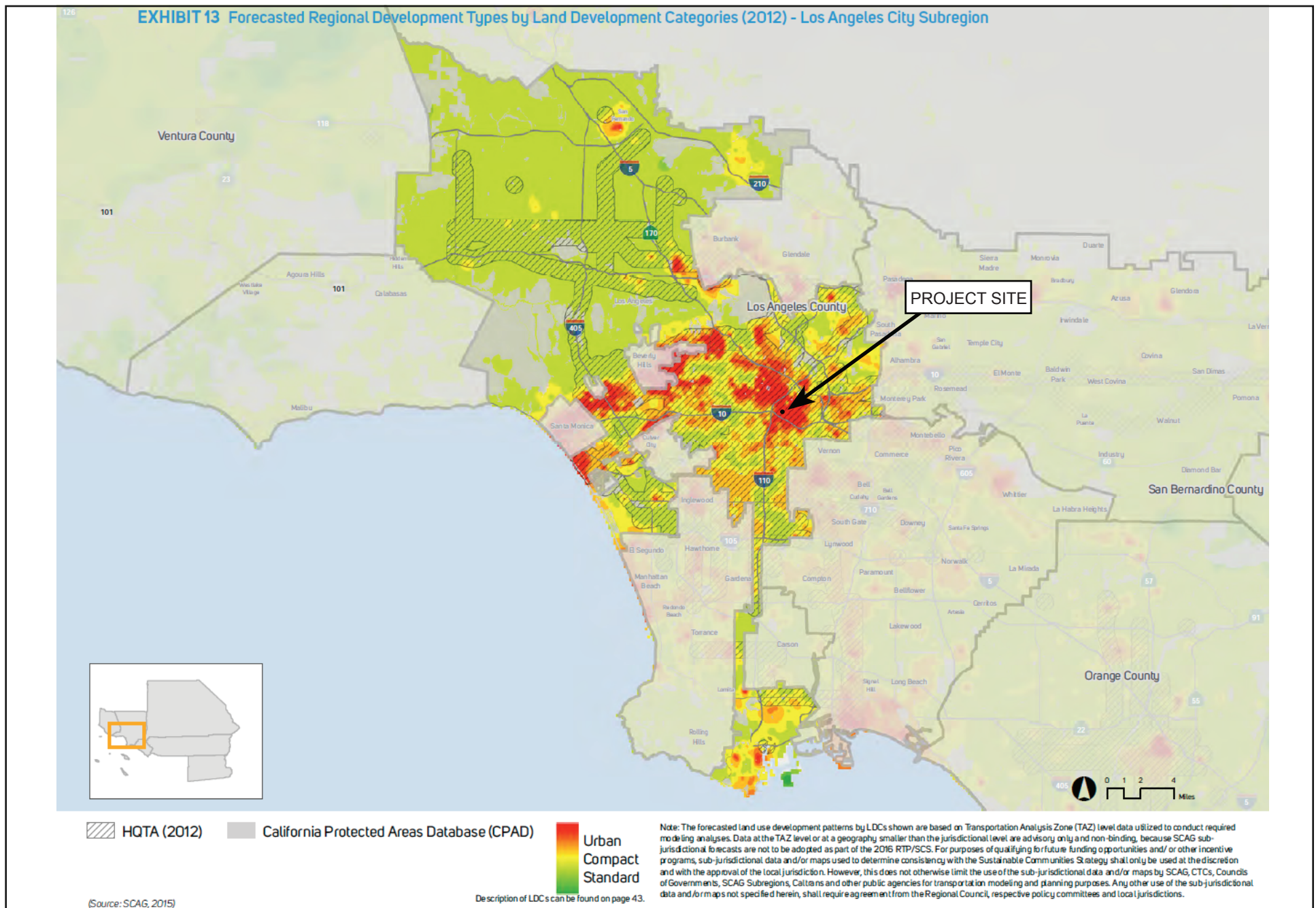
The Proposed Project would be consistent with the Urban LDC. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, near Downtown Los Angeles. The Proposed Project is an infill project that would provide mixed-use development with multi-family units and neighborhood serving ground floor commercial uses. The Proposed Project is located within a High Quality Transit Area (HQTAs) as defined by SCAG and within a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. The Project Site is located approximately 0.6 mile walking distance of the Pico Rail Station and approximately 0.9 mile walking distance from the 7<sup>th</sup> Street / Metro Center Station. 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 states that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit<sup>4</sup>. The Proposed Project includes a 30-story mixed-use residential and commercial building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail space. The Proposed Project would promote pedestrian activity and bicycling activity by providing landscaping along the public right-of-way and retail spaces within a HQTAs. The Proposed Project would also provide vehicle and bicycle parking that is consistent with LAMC requirements. Pursuant to LAMC Section 12.21.A.4, up to ten percent of the required vehicle parking for residential uses and up to 20 percent of required vehicle parking for non-residential uses may be replaced by bicycle parking at a ratio of one vehicle parking space for four bicycle parking spaces. As such, the proposed 373 vehicle parking spaces would be compliant with LAMC requirements and consistent with the bike infrastructure and reduced vehicle parking requirement characteristics that define HQTAs. Therefore, the Proposed Project is similar to other developments within HQTAs and would be consistent with the Urban LDC within the 2016-2040 RTP/SCS.

These LDCs are also included in the updated 2020-2045 RTP/SCS, discussed below.

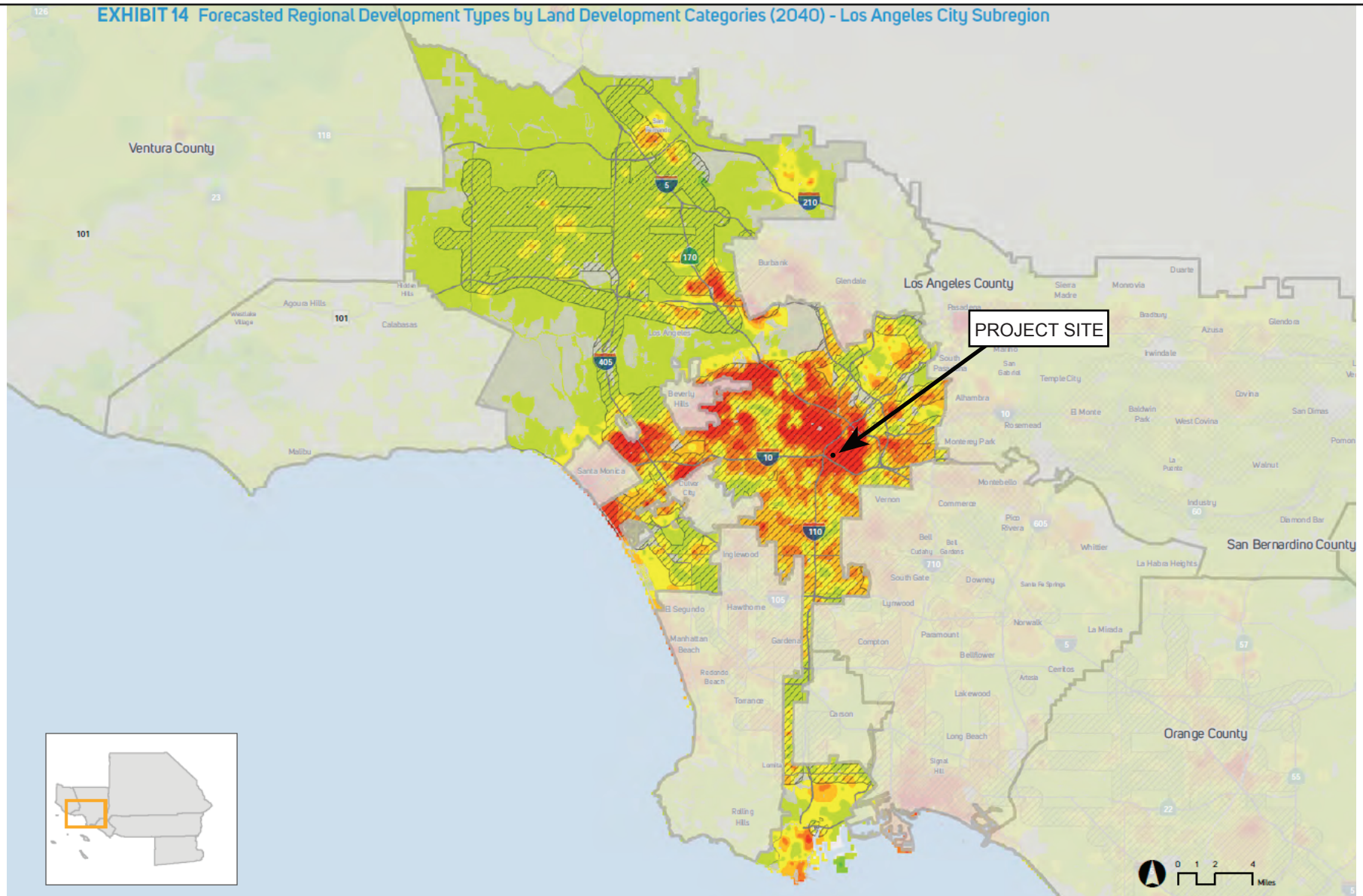
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<sup>4</sup> 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, 2016, p. 25.





# EXHIBIT 14 Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion



Legend: HQT (2040) California Protected Areas Database (CPAD)

Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown 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 are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG 2015)

Description of LDCs can be found on page 43.

Source: Appendix L - SCAG 2016-2040 RTP/SCS Sustainable Communities Strategy Background Documentation.

## *2020-2045 RTP/SCS (Connect SoCal)*

In September 2020, SCAG's Regional Council adopted Connect SoCal, the 2020-2045 RTP/SCS of the Southern California Association of Governments (SCAG). The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. On October 30, 2020, CARB accepted SCAG's quantification of GHG emission reductions from Connect SoCal and determined that Connect SoCal would, if implemented, achieve the 2035 GHG emission reduction targets established by CARB.<sup>5</sup>

### Use Designation, Density, and Building Intensity

SCAG's Scenario Planning Model (SPM) is a data management, land use planning, and modeling tool. SPM enables the creation and organization of local and regional data, plan and policies, facilitates scenario creation and editing and estimates a wide range of potential benefits resulting from alternative transportation and land use strategies.

SCAG's SPM employs a series of Place Types to describe the different types of land uses in the region. The Place Types—each comprised of a mix of different building types along with assumptions about characteristics such as the amount of land devoted to streets, parks, and civic areas – represent the complete range of development types and patterns that make up a scenario. These Place Types contain a large amount of information relating to the characteristics of the landscape, including jobs and housing density, urban design, mix of land uses and are intended for modeling purposes.

SCAG also categorizes existing land uses into land use types. Land Development Categories (LDCs)—Urban, Compact, or Standard—represent distinct forms of land use, ranging from dense and walkable mixed-use urban areas well served by transit, to lower-intensity, less walkable places where land uses are segregated and most trips are made via automobile. These LDCs are an aggregation of the 35 Place Types and are used to describe the general conditions within a specific area.<sup>6</sup> The Connect SoCal, Sustainable Communities Strategy Technical Report, forecasts LDCs by county and subregion for 2045; Exhibit 1: Connect SoCal Forecasted Regional Development Pattern.<sup>7</sup>

The Project Site area is located within an "Urban" Land Development Category (LDC). The Urban LDC is the highest density and most intense land development category assessed in the Connect SoCal SCS. The Connect SoCal SCS describes the Urban Land Development Category as:

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<sup>5</sup> CARB Executive Order No. G-20-239.

<sup>6</sup> Connect SoCal, Sustainable Communities Strategy Technical Report, p.44-45.

<sup>7</sup> Connect SoCal, Sustainable Communities Strategy Technical Report, p.33.

*These areas are often found within and directly adjacent to moderate and high density urban centers. Virtually all 'Urban' growth would be considered infill or redevelopment. The majority of housing units are 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. Well-connected street networks and the mix of intensity of uses result in a highly walkable environment. Enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.<sup>8</sup>*

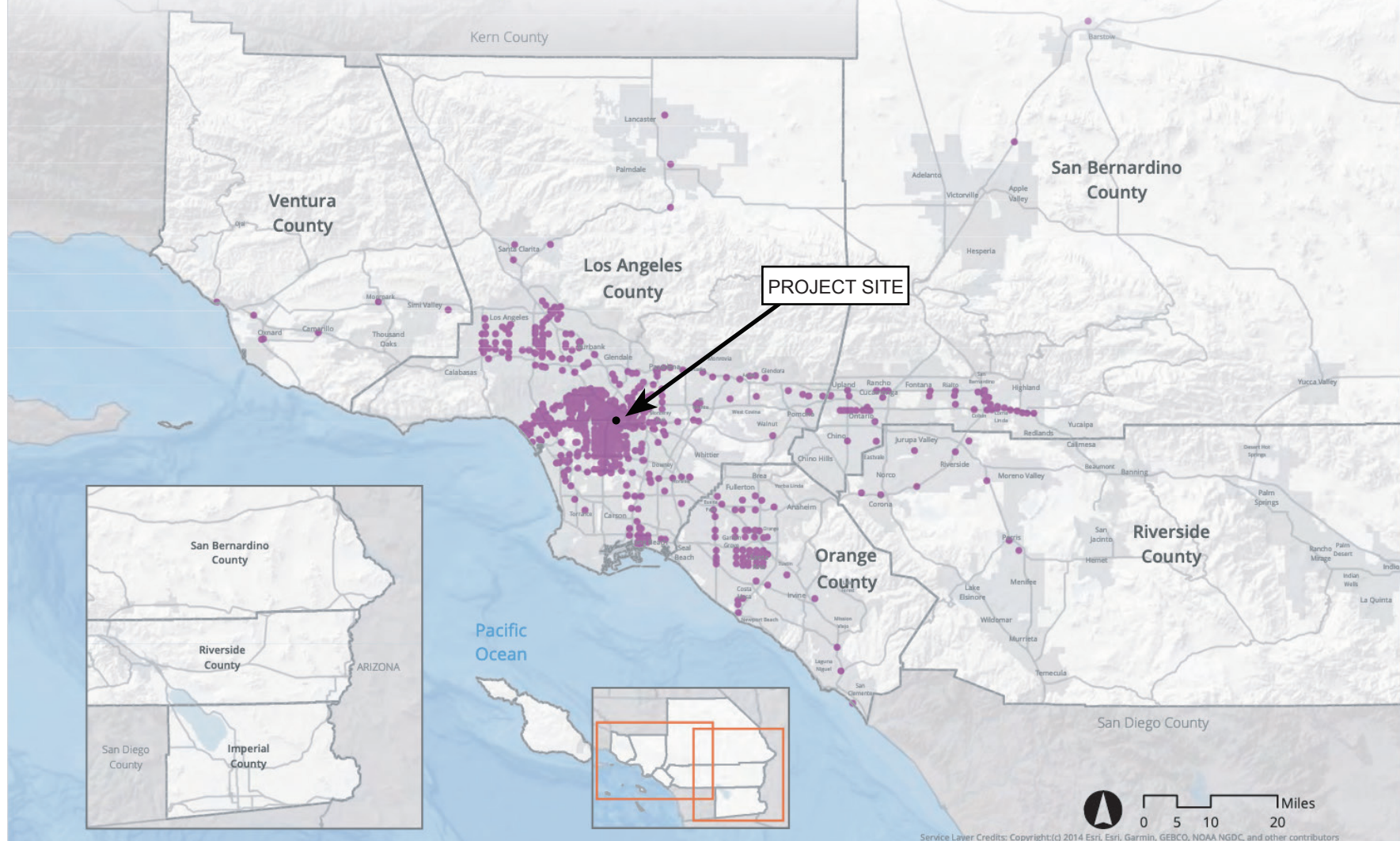
As previously discussed, the Proposed Project would be consistent with the Urban LDC. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, near Downtown Los Angeles. The Proposed Project is an infill project that would provide mixed-use development with multi-family units and neighborhood serving ground floor commercial uses. The Proposed Project is located within a High Quality Transit Area (HQTAs) as defined by SCAG and within a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. This is shown below in Figure 3.3, Connect SoCal Transit Priority Areas (2045), which depicts the location of the Project Site in relation to the location of TPAs within the SCAG region for the year 2045, and Figure 3.4, Connect SoCal High Quality Transit Areas (2045), which depicts the location of the Project Site in relation to the location of HQTAs within the SCAG region for the year 2045. The Project Site is located approximately 0.6 mile walking distance of the Pico Rail Station and approximately 0.9 mile walking distance from the 7<sup>th</sup> Street / Metro Center Station. 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. Connect SoCal 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 a mixed-use project, which includes a 30-story mixed-use residential and commercial building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail space. The Proposed Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way and retail spaces. The Proposed Project would provide parking that is consistent with LAMC standards. Therefore, the Proposed Project is similar to other developments within HQTAs.

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<sup>8</sup> *Connect SoCal, Sustainable Communities Strategy Technical Report, p.45.*



### EXHIBIT 3.7 Priority Growth Area - Transit Priority Areas



#### Transit Priority Areas (2045)

■ TPA

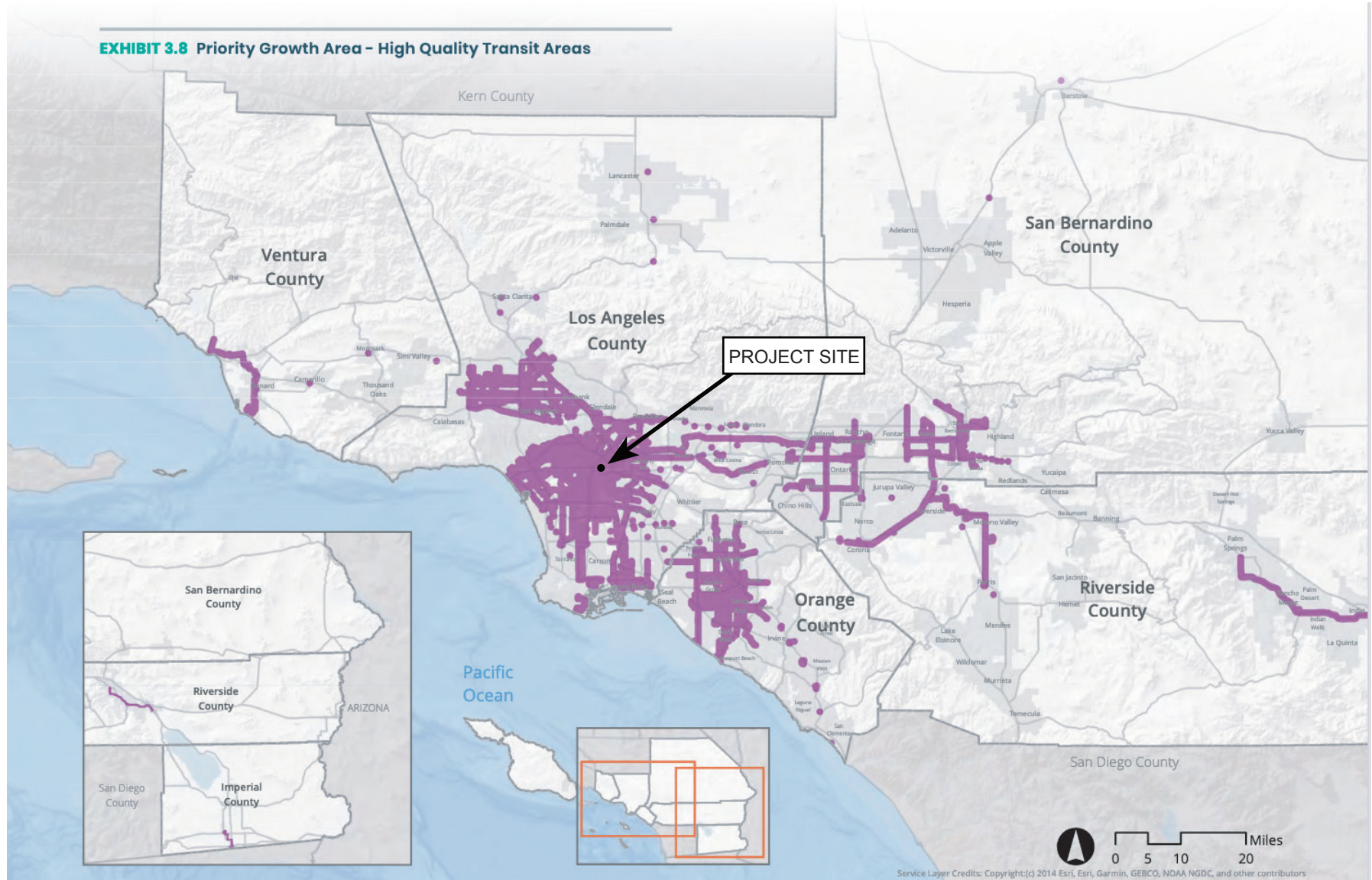
Source: County Transportation Commissions, SCAG, 2019

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

Source: SCAG Connect SoCal, September 3, 2020.



### EXHIBIT 3.8 Priority Growth Area - High Quality Transit Areas



High Quality Transit Areas (2045)

■ HQTAs

Source: County Transportation Commissions, SCAG, 2019

Note: SCAG's High Quality Transit Area (HQTAs) is within one-half mile from major transit stops and high quality transit corridors (HQTAs). SCAG identifies major transit stops and HQTAs using the methodology described in the Transit Technical Report. Major transit stops and HQTAs are extracted from 2045 plan year data of Connect SoCal.

Source: SCAG Connect SoCal, September 3, 2020.

As a Land Use Tool, Connect SoCal identifies Priority Growth Areas (PGAs) throughout the SCAG region where Connect SoCal strategies can be fully realized. These PGAs include Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These PGA categories account for only four percent of the SCAG region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.<sup>9</sup> This more compact form of regional development can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the SCAG region's resource areas. As shown below in Figure 3.5, Connect SoCal Forecasted Regional Development Pattern, the Project Site is located within a Priority Growth Area, specifically within a Job Center, HQTA, and Neighborhood Mobility Area (NMA). Job Centers are defined as having a significantly higher employment density than surrounding areas, and that employment growth and residential growth are prioritized in existing Job Centers in order to leverage existing density and infrastructure.<sup>10</sup> NMAs are areas that focus on creating, improving, restoring, and enhancing safe and convenient connections to retail and services, increasing walkability, and which have robust residential to non-residential land use connections and encourage safer multi-modal short trips to reduce reliance on single occupancy vehicles.<sup>11</sup> In addition, the Project Site is located within a Livable Corridor, defined as a strategy comprised of three components (transit improvements, active transportation improvements, and land use policies) to encourage local jurisdictions to plan and zone for increased density at nodes along key corridors and to "redevelop" single-story under-performing retail with well-designed, higher density housing and employment centers.<sup>12</sup>

The Proposed Project would be consistent with these applicable PGA categories (Job Centers, HQTAs, NMAs, and Livable Corridors), as it would create neighborhood serving ground floor retail and multi-family residential as a compact infill development in a highly urbanized area of the City and locate housing and employment opportunities in close proximity to Downtown Los Angeles, with access to a robust transit network, including bus stops with peak commute intervals of 15 minutes or less and located approximately 0.6 mile and 0.9 mile walking distance to the Pico Rail Station and 7<sup>th</sup> Street / Metro Center Station, respectively, in addition to providing on-site Code compliant bicycle parking.

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<sup>9</sup> *Connect SoCal*, p.50.

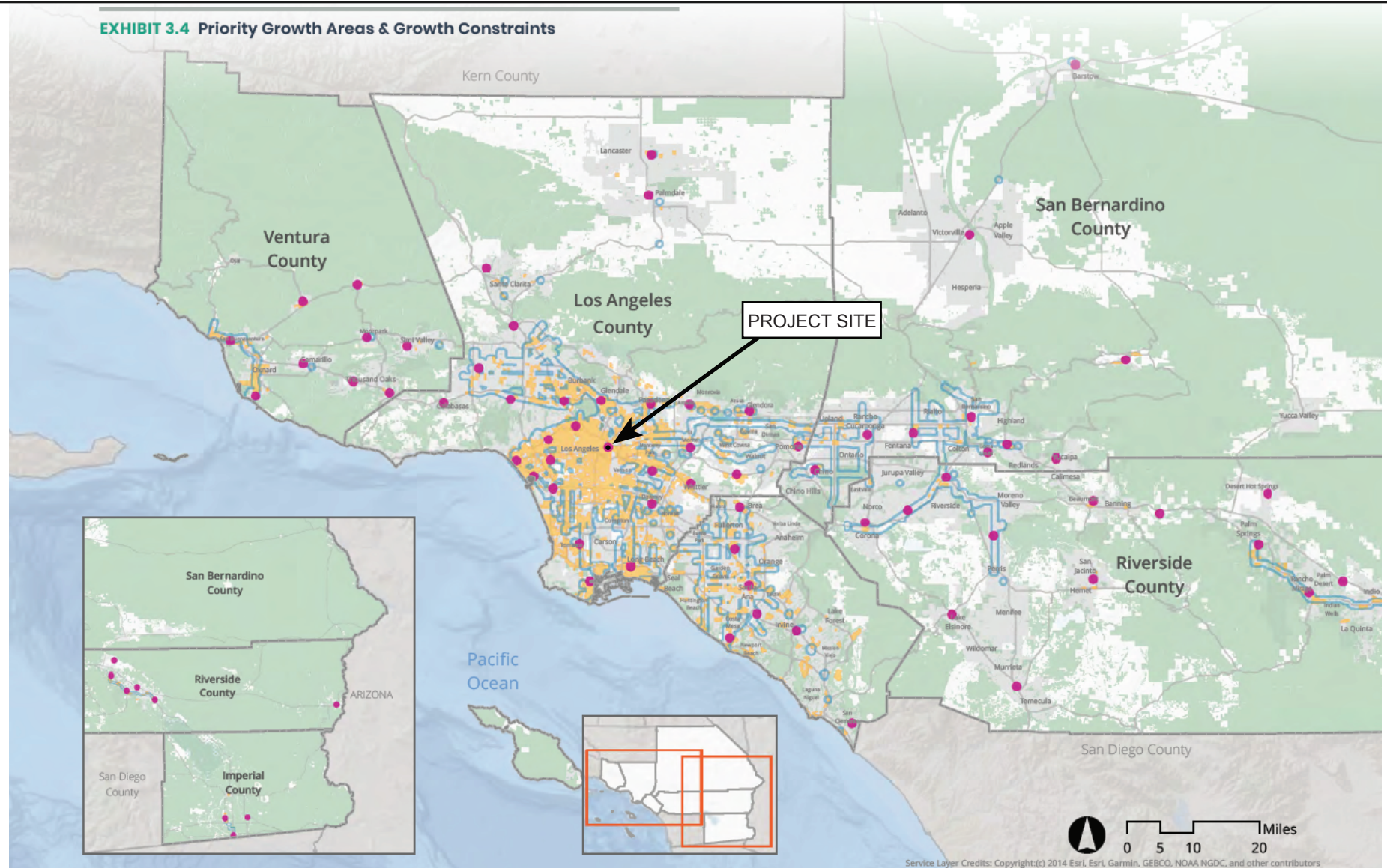
<sup>10</sup> *Ibid.*

<sup>11</sup> *Connect SoCal*, p.51-52.

<sup>12</sup> *Connect SoCal*, p.52.



### EXHIBIT 3.4 Priority Growth Areas & Growth Constraints



#### Priority Growth Areas vs. Regional Growth Constraints

- Job Center
- Neighborhood Mobility Areas
- High Quality Transit Area
- Regional Growth Constraints

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

Source: SCAG Connect SoCal, September 3, 2020.

The Connect SoCal SCS includes various urban footprint place types, including mixed use, residential, commercial, office, research and development, industrial, civic and open space.<sup>13</sup> The Proposed Project is consistent with a range of place types within the Urban LDC.

“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 usually structured below or above ground. Workers, residents, and visitors are well-served by transit, and can walk or bicycle for many of their transportation needs.” The land use mix for this place type is typically approximately 18 percent residential, 16 percent employment, 45 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multi-family. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 15 to 100 feet, and the gross density ranges from 50 to 500 employees per acre and 40 to 500+ households per acre.<sup>14</sup>

‘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 - 60, and the gross density ranges from 0 – 50+ employees per acre 75 - 500+ households per acre.<sup>15</sup>

“Industrial/Office/Residential Mixed Use High” is characterized by a wide-ranging, intensely developed mix of uses located in close proximity and set in an automobile-oriented context. Building heights can range from 1 to 15+ stories, and uses can include but are not limited to industrial, warehouses, offices, residential, and retail. The land use mix for this place type is typically approximately 58 percent residential, 36 percent employment, and 6 percent open space. The average total net FAR is 2.0, floors range from 1 – 17, and the gross density ranges from 3 – 250+ employees per acre 18 – 200+ households per acre.<sup>16</sup>

The Proposed Project is a mixed-use development up to 30 stories tall consisting of residential and commercial uses in a highly-urbanized part of Central Los Angeles, on a site that is currently occupied by four commercial buildings and surface parking. Adjacent land uses include commercial/retail, office, industrial uses, mixed-use residential buildings, and surface parking. The Proposed Project is approximately 96 percent residential, and approximately four percent non-residential with a non-residential FAR of 0.26 to 1. The Proposed Project area is

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<sup>13</sup> *Connect SoCal, SCS Technical Report, Appendix 1, SPM Place Types.*

<sup>14</sup> *Connect SoCal SCS Appendix 1, SPM Place Types, p. 1.*

<sup>15</sup> *Ibid.*

<sup>16</sup> *Connect SoCal, SCS Appendix 1, SPM Place Types, p.8.*



supported by high levels of regional and local transit. The Proposed Project would construct approximately 324 dwelling units per acre and will have a total net FAR of 7.03 to 1.

Based on the regional growth projections in the Connect SoCal plan, the City had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). SCAG's population and housing projections for the City, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 3.1, below.

**Table 3.1**  
**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>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
<b>Households</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
<b>Employment</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%
<i>Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.</i>			

The Proposed Project is an infill development project within the Central City Community Plan Area. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.77 million persons by 2045. As shown in Table 3.1, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number

of households within the SCAG Region is anticipated to increase by 1,621,000 households, or approximately 27% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 287,600 jobs (approximately 16%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,660,000 jobs (approximately 20%) between 2016 and 2045.

Based on the community's current household demographics (e.g., an average of 2.6 persons per multi-family household for the City of Los Angeles), the construction of 363 additional residential dwelling units would result in an increase in approximately 944 net permanent residents in the City of Los Angeles.<sup>17</sup> Further, the Proposed Project includes a total of 12,500 square feet of ground-floor commercial/retail space. The Proposed Project would generate the need of approximately 33 employees.<sup>18</sup> The proposed increase in housing units and population would be consistent with SCAG's forecast of approximately 426,000 additional households, approximately 837,500 persons, and 287,600 jobs in the City of Los Angeles between 2016 and 2045. 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, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer Section 6, Sustainable Communities Environmental Assessment, 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 Connect SoCal. Refer to Table 3.2 below for the Proposed Project's consistency analysis.

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<sup>17</sup> Based on the U.S. Census Bureau, American Community Survey (ACS) PUMS database, the City of Los Angeles' citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).

<sup>18</sup> One employee would occupy approximately 383 square feet of retail space. Source: United States Green Building Council, Building Area Per Employee by Business Type, May 13, 2008.

**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
<b>Connect SoCal Goal 1</b> Encourage regional economic prosperity and global 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.
<b>Connect SoCal Goal 2</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent.</b> The Project Site is located in a highly urbanized area within the City of Los Angeles within a High Quality Transit Area (as defined by SCAG). The Proposed Project would develop 363 dwelling units and 12,500 square feet of commercial/retail area within a HQTAs as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance from the 7 <sup>th</sup> Street/Metro Center 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 location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
<b>Connect SoCal Goal 3</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Not Applicable.</b> This goal is directed towards SCAG and does not apply to the Proposed Project. Nonetheless, Connect SoCal states, “A regional transportation system may be considered ‘sustainable’ if it maintains its overall performance over time in an equitable manner with minimal impact to the environment, while not compromising future transportation needs. Essentially, sustainability refers to how decisions made today impact future generations. One of the measures used to evaluate transportation system sustainability is the total inflation-adjusted cost per capita to maintain our existing regional multimodal transportation system in a state of good repair.” <sup>19</sup> As discussed in the Proposed Project’s Traffic Study (located in Appendix J of this SCEA), Proposed Project would result in a less than significant VMT impact. As such, the Project would not conflict with the RTP/SCS’s goals and policies related to a sustainable regional transportation system.
<b>Connect SoCal Goal 4</b> Increase person and goods movement and travel choices within the transportation system.	<b>Consistent.</b> 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 would provide 195 bicycle spaces to promote travel by bicycle. The Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9

<sup>19</sup> SCAG, *Connect SoCal 2020-2045 RTP/SCS*, September 2020 (page 135).

**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
	<p>mile walking distance from the 7<sup>th</sup> Street/Metro Center 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 and visitors with convenient access to public transit and opportunities for walking and biking. 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.</p>
<p><b>Connect SoCal Goal 5</b> Reduce greenhouse gas emissions and improve air quality.</p>	<p><b>Consistent.</b> The Proposed Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. As discussed further in Section 6.III, Air Quality, construction and operational generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections 6.VI, Energy and 6.VIII, Greenhouse Gas Emissions, the Proposed Project would comply with all regulations and policies aimed at reducing energy and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Therefore, the Proposed Project would not conflict with this Goal.</p>
<p><b>Connect SoCal Goal 6</b> Support healthy and equitable communities.</p>	<p><b>Consistent.</b> The Proposed Project would place dwelling units and ground-floor commercial space in a Transit Priority Area. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the 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 195 bicycle spaces to promote travel by bicycle. Thus, the Proposed Project would reduce vehicle-miles-traveled and help improve air quality. The Proposed Project supports active transportation.</p>
<p><b>Connect SoCal Goal 7</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p><b>Consistent.</b> As stated above, the Project Site is located in a highly urbanized area near downtown Los Angeles within a HQTAs (as defined by SCAG) and a</p>



**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
	Transit Priority Area (as defined by SB 743). The Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance to the 7 <sup>th</sup> Street/Metro Center 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 and commercial uses near mass transit and in close proximity to services, retail stores, and employment opportunities. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
<b>Connect SoCal Goal 8</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<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>Connect SoCal Goal 9</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<b>Consistent.</b> The Proposed Project includes 363 residential dwelling units and 12,500 square feet of commercial uses. 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. 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 Supplemental VMT Analysis (located in Appendix J of this SCEA), the Proposed Project would not create a significant impact with respect to increased VMT.
<b>Connect SoCal Goal 10</b> Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Not Applicable.</b> This Goal is not applicable to the Proposed Project since the Project Site does not contain any natural or agricultural lands. No further discussion is required.
<b>Connect SoCal Guiding Principal 1</b> Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Guiding Principal 2</b> Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Guiding Principal 3</b> Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	<b>Consistent.</b> The Proposed Project would develop 363 dwelling units and 12,500 square feet of commercial/retail area within a HQTa and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment

**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
	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. The Proposed Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. Thus, the Proposed Project is consistent with this guiding principle.
<b>Connect SoCal Guiding Principal 4</b> Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	<b>Not Applicable.</b> This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupant vehicles. Nevertheless, the Proposed Project is located within a HQTAs and a TPA. The Proposed Project would support public transportation and other alternative methods of transportation (e.g., transit, walking and biking). Therefore, the Proposed Project would not conflict with this Guiding Policy.
<b>Connect SoCal Guiding Principal 5</b> Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. However, this relates to the Connect SoCal Goal 5, above. The Proposed Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Section 6.III, Air Quality, air quality emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections 6.VI, Energy, and 6.VIII, Greenhouse Gas Emissions, the Proposed Project would comply with all regulations and policies aimed at reducing energy consumption and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Therefore, the Proposed Project would not conflict with this Guiding Policy.
<b>Connect SoCal Guiding Principal 6</b> Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Guiding Principal 7</b> Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.

**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
<b>Connect SoCal Sustainable Communities Strategy 1</b> Focus Growth Near Destinations & Mobility Options	<b>Consistent.</b> As stated previously, the Proposed Project would develop 363 dwelling units and 12,500 square feet of commercial/retail area within a HQTA and a TPA, near downtown Los Angeles. 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. The Proposed Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. Thus, the Proposed Project is consistent with this strategy.
<b>Connect SoCal Sustainable Communities Strategy 2</b> Promote Diverse Housing Choices	<b>Consistent.</b> The Proposed Project includes 363 residential dwelling units and 12,500 square feet of commercial uses. Of the 363 residential dwelling units, the unit mix would include 122 studio units, 133 one-bedroom units, 96 two-bedroom units, and 12 three-bedroom units. Further, the Proposed Project would locate multi-family residential and commercial in close proximity to public transportation, thus providing housing and jobs near transit. The Proposed Project would also include 183 residential bicycle parking spaces and 12 commercial bicycle parking spaces in compliance with LAMC requirements. Thus, development of the Proposed Project would support a reduction in greenhouse gas emissions. Moreover, as discussed in the Proposed Project's Supplemental VMT Analysis (located in Appendix J of this SCEA), the Proposed Project would not create a significant impact with respect to increased VMTs. Thus, the Proposed Project is consistent with this strategy.
<b>Connect SoCal Sustainable Communities Strategy 3</b> Leverage Technology Innovations	<b>Not Applicable.</b> This strategy is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Sustainable Communities Strategy 4</b> Support Implementation of Sustainability Policies	<b>Not Applicable.</b> This strategy is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Sustainable Communities Strategy 5</b> Promote a Green Region	<b>Not Applicable.</b> This strategy is directed towards SCAG and does not apply to the Proposed Project. However, this relates to the Connect SoCal Goal 5, above. See response to Connect SoCal Goal 5 and Guiding Principal 5, above. No further discussion is required.
<i>Source: Southern California Association of Governments, Connect SoCal (2020-2045 RTP/SCS), September 2020.</i>	

**Consistency with Criterion #2:**

***The Proposed Project contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent non-residential uses, a floor area ratio of not less than 0.75.***

The Proposed Project includes the construction of a total floor area of 343,447 square feet. The Proposed Project includes 363 dwelling units (which encompasses approximately 330,947 square feet of residential floor area), comprising 96 percent of the total floor area. The Proposed Project includes commercial/retail space (which encompasses approximately 12,500 square feet of non-residential uses), comprising approximately four percent of the total floor area. This results in a non-residential FAR of approximately 0.26:1. As such, the Proposed Project would be consistent with this Criterion.

**Consistency with Criterion #3:**

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

The Project Site is approximately 1.12 acres before street easements and dedications. The Proposed Project includes 363 dwelling units; as such, the Proposed Project provides approximately 324 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

**Consistency with Criterion #4:**

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

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.

Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.



The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express, Santa Monica Big Blue Bus (BBB), and the City of Gardena (GTrans). The Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less along Main Street, Los Angeles Street, Broadway, Pico Boulevard, and Olympic Boulevard. The bus lines within a “reasonable walking distance” (approximately one-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11<sup>th</sup> Street. Additionally, at further walking distances, the Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance to the 7<sup>th</sup> Street/Metro Center Station. The Project Site’s proximity to the Pico Rail Station and the 7th Street / Metro Center Station provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. Due to its proximity to the aforementioned bus stops and rail stations, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area. As such, Connect SoCal identifies the Project Site as being within a HQTa. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this Criterion.

## C. SB 375 Streamlining Benefits

Pursuant to Public Resources Code, 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 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. As such streamlining benefits 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));
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);
4. Reduced density alternatives are not required to be referenced, described, or discussed to address the effects of car and light-duty truck trips generated by the Proposed Project (Public Resources Code Section 21159.28(b)).

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

## D. 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 would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, the SCEA would analyze the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- 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
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance