

## **3.0 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT CRITERIA**

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### **3.1 CONSISTENCY FINDINGS**

As explained below, the proposed Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to PRC Section 21155.

#### **RTP/SCS Consistency**

PRC Section 21155(a) states that a SCEA is only applicable for a Transit Priority Project that is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the applicable metropolitan planning organization, in this case the Southern California Association of Governments (SCAG).

SCAG is the applicable Metropolitan Planning Organization (“MPO”) for the Project site. As such, under SB 375, SCAG developed the applicable SCS governing the Project site, the SCAG 2016 RTP/SCS, adopted on April 7, 2016. On April 2016, SCAG’s Regional Council adopted the 2016–2040 RTP/SCS: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The RTP/SCS is a culmination of a multiyear effort involving stakeholders from across the SCAG Region. The 2016–2040 RTP/SCS is intended to balance the Southern California region’s future mobility and housing needs with economic, environmental, and public health goals. On June 28, 2016, ARB accepted SCAG’s quantification of GHG emission reduction from the 2016–2040 RTP/SCS and determined that the 2016–2040 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by ARB.<sup>15</sup>

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

As part of its requirement to be designated as a transit priority project under SB 375, the Project is consistent with the applicable general land use designation, density, and building intensity categories and requirements outlined in the SCAG 2016–2040 RTP/SCS. The Project site is located within the Central City Community Plan Area, a highly urbanized area within downtown Los Angeles in an area dominated by high-rise buildings and dense commercial and residential uses. The Project site is within an area designated by the 2016–2040 RTP/SCS as “Urban,” a land development category (LDC) with the highest density and intensity of land development under the 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS identifies the Project area as an Urban LDC in both 2012 and 2040.<sup>16</sup> The 2016-2040 RTP/SCS describes the Urban Land Development Category as:

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<sup>15</sup> ARB Executive Order G-16-066.

<sup>16</sup> SCAG, 2016-2040 RTP/SCS.

*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.<sup>17</sup>*

The Project would be consistent with the Urban LDC. The Project site is an infill multifamily residential project located within one of the most highly urbanized areas in the City of Los Angeles. Further, the Project site is located within a High Quality Transit Area (HQTA) as determined by SCAG<sup>18</sup> and a Transit Priority Area<sup>19</sup> under SB 743. These are areas served by a variety of transit opportunities and alternative modes of transportation and thus promote a well-connected, highly walkable environment. As mentioned previously, Metro operates the Silver Line, three Rapid bus lines, four Express lines, and eighteen local lines in the Project Area. Additional transit lines include eight LADOT Commuter Express lines, three Montebello bus lines, three LADOT DASH bus lines, two Orange County Transportation Authority bus lines, eight Foothill Transit bus lines, one Big Blue Bus line and one Torrance bus line operating in the Project Area. As such, the Project's future residents, patrons, and guests would have immediate access to convenient, reliable transit, including for individuals who choose not to own or use personal automobiles.

The 2016-2040 RTP/SCS describes HQTAs as areas that may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Project would develop a new, 41-story multiple dwelling residential building containing 570 units and would promote pedestrian and bicycling activity by providing an activated street frontage with pedestrian amenities such as landscaping, outdoor seating areas, street furniture, and a ground floor with greater transparency than the current condition. Further, the Project, in accordance with the City's bicycle parking ordinance (see LAMC Section 12.21.A.16), including 240 long-term and 23 short-term bicycle parking spaces. The Project would provide 155 new automobile parking spaces consistent with LAMC and Bunker Hill Specific Plan requirements, including available LAMC reductions for the provision of bicycle parking spaces. With approximately 1,232 existing automobile parking spaces and the 155 new spaces, the total on-site parking would be 1,387 spaces.

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17 Southern California Association of Governments, *Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016, Chapter 2, 'Where We Are Today', [http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS\\_02\\_WhereWeAreToday.pdf](http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_02_WhereWeAreToday.pdf), page 20, accessed August 2019.

18 SCAG, *High Quality Transit Areas (HQTA) 2040 – SCAG Region*, [http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1\\_1?geometry=-119.935%2C33.582%2C-116.229%2C34.379](http://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-119.935%2C33.582%2C-116.229%2C34.379), accessed October 19, 2018.

19 City of Los Angeles, ZIMAS, "Parcel Profile Report," [zimas.lacity.org](http://zimas.lacity.org), accessed September 2019.

The 2016–2040 RTP/SCS includes various urban footprint place types for transit priority projects, including mixed use, residential, commercial, office, research, and development, industrial, civic, and open space. The Project is consistent with the “Urban Residential” place type within the urban land development category. The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 5 to 60 feet, and the gross density ranges from 0 to 50+ employees per acre and 75 to 500+ households per acre.<sup>20</sup>

Based on the Central City Community Plan Area’s current household size (e.g., an average of 1.89 persons per multifamily household for the Central City Community Plan area),<sup>21</sup> the construction of 570 new multifamily residential dwelling units would result in an estimated increase of approximately 1,077 new residents in the Bunker Hill and downtown area. Conservatively assuming all of the approximately 1,077 residents would come from outside the City of Los Angeles, the proposed increase in housing units and population would be consistent with and well within SCAG’s forecasted growth of approximately 364,800 households and approximately 763,900 persons in the City of Los Angeles between 2012 and 2040.<sup>22</sup>

**Applicable Policies Specified for the Project Area**

As discussed in **Section 4.0: Initial Study** of this SCEA, the Project is consistent with SCAG’s growth projections for the City of Los Angeles, which supports the conclusion that the Project is consistent with SCAG policies. The Project would be consistent with applicable goals and policies presented within SCAG’s 2016-2040 RTP/SCS, as shown in **Table 3.1-1: Consistency Analysis 2016–2040 RTP/SCS**, below.

**Table 3.1-1  
Consistency Analysis 2016–2040 RTP/SCS**

Goals, Strategies, and Actions	Consistency Analysis
<p><b>2016-2040 RTP/SCS Goal 1:</b> Align the plan investments and policies with improving regional economic development and competitiveness.</p>	<p><b>Not Applicable.</b> This goal is directed towards SCAG and the City of Los Angeles (City) and would not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>

20 Southern California Association of Governments, *2016-2040 RTP/SCS Background Documentation*, ‘Place Types Categorized Into Land Development Categories (LDCs)’; SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, [http://scagrtpsc.net/Documents/2016/draft/d2016RTPSCS\\_SCSBackgroundDocumentation.pdf](http://scagrtpsc.net/Documents/2016/draft/d2016RTPSCS_SCSBackgroundDocumentation.pdf), accessed August, 2019; see also “Place Types Categorized into Land Development Categories,” available at [http://scagrtpsc.net/Documents/2016/supplemental/LDC\\_PlaceType.pdf](http://scagrtpsc.net/Documents/2016/supplemental/LDC_PlaceType.pdf), accessed August 2019.

21 City of Los Angeles, *Central City Community Plan*.

22 SCAG, *2016-2040 RTP/SCS Demographics and Growth Forecast Appendix*, Table 11, [http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf), accessed August 2019.

Goals, Strategies, and Actions	Consistency Analysis
<p><b>2016-2040 RTP/SCS Goal 2:</b> Maximize mobility and accessibility for all people and goods in the region.</p>	<p><b>Consistent.</b> The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTa) and a Transit Priority Area (TPA). The Project would develop 570 residential units, including 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units, attracting a diverse range of potential residents.</p> <p>The Project Area is currently served by a total of seven local and inter-city transit operators. The Los Angeles County Metropolitan Transportation Authority (Metro) operates the Silver Line, three Rapid bus lines, four Express lines and eighteen local lines in the Project Area. Additional transit lines include eight Los Angeles Department of Transportation (LADOT) Commuter Express lines, three City of Montebello bus lines, three LADOT DASH bus lines, two Orange County Transportation Authority bus lines, eight Foothill Transit bus lines, one Santa Monica Big Blue Bus line, and one Torrance Transit bus line operating in the Project Area.</p> <p>The Metro Red/Purple Lines also provide proximate service to the Project site; the nearest stations are the 7th Street Metro Center station, approximately 0.35 miles to the southwest; the Pershing Square station, approximately 0.35 miles to the southeast; and the Civic Center/Grand Park station, approximately 0.4 miles east.</p> <p>Additionally, the Metro Grand Avenue Arts/Bunker Hill station is under-construction at the intersection of Flower Street and 2nd Street, approximately 0.1 miles northeast of the Project site. This station is being constructed as part of the Regional Connector Transit Project which, when completed, will connect the Little Tokyo/Arts District Station with the 7th Street/Metro Center Station in downtown Los Angeles following a route underneath 2nd Street and Flower Street.</p>
<p><b>2016-2040 RTP/SCS Goal 3:</b> Ensure travel safety and reliability for all people and goods in the region.</p>	<p><b>Not Applicable/Consistent.</b> While not necessarily applicable on a project-specific basis, the Project would support this goal by improving local access to alternative forms of transportation, coupled with appropriate design considerations to ensure travel safety, reliability, and activation of street frontages in a manner that would promote alternative forms of transportation. Specifically, the frontage of the Project along Figueroa Street would feature improved sidewalks with wider pedestrian space and additional landscaping. By enabling a diverse modal split for future residents and visitors in light of its location, the Project would help to indirectly ensure that respective transportation systems are more timely, reliable, and safe. The Project would be consistent with SCAG, County, and City efforts in reaching 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/Consistent.</b> While not necessarily applicable on a project-specific basis, the Project would support this goal by improving the viability of alternative forms of transportation</p>

Goals, Strategies, and Actions	Consistency Analysis
	<p>through higher density development, heightened walkability, and additional bicycle infrastructure. A variety of alternative transportation options would help to ensure the mobility needs of residents and visitors are met while promoting the development and sustainability of a more robust and sustainable regional transportation system. The Project would be consistent with SCAG, County and City efforts in reaching this goal.</p>
<p><b>2016-2040 RTP/SCS Goal 5:</b> Maximize the productivity of our transportation system.</p>	<p><b>Consistent.</b> As stated above, the Project would place 570 new multifamily residential units in proximity to a variety of alternative transportation options, serving to encourage that future residents and visitors utilize these options and diversify the local/regional modal split. The Project’s promotion of the use of a range of transportation modes would work to facilitate a more productive transportation system. Moreover, as discussed in the Traffic Study, the Project would have less than significant traffic and transportation impacts at all intersections within the study area, Project site access points, and on the transit system. The Project would be consistent with the City efforts to meet this goal.</p>
<p><b>2016-2040 RTP/SCS Goal 6:</b> Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p>	<p><b>Consistent.</b> The Project would place new residential units in a HQTAs and TPAs. The Project site’s location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-and alternative transportation friendly environment. The location of the Project promotes the use of a variety of transportation options, which include walking, biking, and using public transportation. Further, the Project would activate street frontages on the ground floor of the building and introduce new landscaping, seating areas, and street furniture, encouraging pedestrian activity. As mentioned previously, the Project would include new bicycle infrastructure, including bicycle parking spaces in compliance with LAMC, to encourage bicycle use. Lastly, public transit would facilitate active transportation as riders would be anticipated to walk for a portion of their trip. Furthermore, all of the Project’s construction and operational criteria pollutant emissions would be below the SCAQMD construction and operational thresholds and the Project would not result in significant impacts with respect to toxic air contaminants. As such, the Project would be consistent with this goal.</p>
<p><b>2016-2040 RTP/SCS Goal 7:</b> Actively encourage and create incentives for energy efficiency, where possible.</p>	<p><b>Consistent.</b> The Project would comply with the City of Los Angeles Green Building Code, the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought-tolerant planting, and high-performance building envelopment consistent with this goal.</p>

Goals, Strategies, and Actions	Consistency Analysis
<p><b>2016-2040 RTP/SCS Goal 8:</b> Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p><b>Consistent.</b> As stated above, the Project site is located in a highly urbanized area of the City of Los Angeles within a HQTAs and a TPA and would serve to integrate land use and transportation strategies. The Project site is well served by mass transit with generally frequent service intervals during peak commute periods, including a total of seven local and inter-city transit operators with a total of 32 bus stops within two blocks of the site. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. As such, the location of the Project site would encourage a variety of transportation options consistent with this goal.</p>
<p><b>2016-2040 RTP/SCS Goal 9:</b> Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p><b>Not Applicable.</b> This goal is directed towards the SCAG region to ensure the safety and security of the regional transportation system. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 1:</b> Transportation investments shall be based on SCAG’s adopted regional Performance Indicators.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation investments rather than individual development projects. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 2:</b> Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation system funding. The Project would contribute to a safe, well-maintained, and efficient multimodal transportation system. As discussed in the Transportation Study, the Project would result in less than significant impacts at the study intersections.<sup>23</sup> The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 3:</b> RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the proposed Project. The Project site’s location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment and smart growth principles outlined under SB 375 and applicable regulations.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 4:</b> Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.</p>	<p><b>Not Applicable.</b> This policy is directed towards transportation investment by SCAG. However, the Project’s location within a TPA promotes the use of public transit and pedestrian activity. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 5:</b> HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.</p>	<p><b>Not Applicable.</b> The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Nevertheless, the Project’s location in a HQTAs and TPA would facilitate greater use of public transit and pedestrian activity. The Project would not be inconsistent with meeting this goal.</p>

23 See Appendix F of this Initial Study.

Goals, Strategies, and Actions	Consistency Analysis
<p><b>2016-2040 RTP/SCS Guiding Policy 6:</b> The RTP/SCS will support investments and strategies to reduce nonrecurrent congestion and demand for single-occupancy vehicle use, by leveraging advanced technologies.</p>	<p><b>Not Applicable.</b> This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single-occupancy vehicles. However, the Project would support the policy as it is located within a TPA and would support public transportation and other alternative methods of transportation. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 7:</b> The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Guiding Policy 8:</b> Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 1:</b> Identify regional strategic areas for infill and investment.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and would not necessarily apply to the Project. Nevertheless, the Project site is located within a SCAG-designated High Quality Transit Area (HQTa) and Transit Priority Area (TPA), as defined by PRC Section 21099, and would construct a high-density infill use at an underutilized infill site.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 2:</b> Structure the plan on a three-tiered system of center development.<sup>24</sup></p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and would not specifically apply to the Project. Nevertheless, the Project site is located in a highlighted developed urban center with robust transportation infrastructure in place. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 3:</b> Develop “Complete Communities.”</p>	<p><b>Consistent.</b> The Project site’s placement of high-density urban infill housing in proximity to a concentration of amenities and activities, including employment, retail, and entertainment, would enable future on-site residents or visitors to make short trips via transit, walking, or biking to meet all of their daily needs within a short distance of the Project site, a key component of the concept behind “complete communities.” As such, the Project would be consistent with this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 4:</b> Develop nodes on a corridor.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City in identifying sites and devising a system where development patterns are clustered along higher density transit corridors. The Proposed Project is located within a HQTa and a</p>

24 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.

Goals, Strategies, and Actions	Consistency Analysis
	transit-priority area. The Proposed Project’s mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities. The Project would not be inconsistent with meeting this goal.
<p><b>2016-2040 RTP/SCS Land Use Policy 5:</b> Plan for additional housing and jobs near transit.</p>	<p><b>Consistent.</b> The Project would place 570 new residential units in an HQTa and a TPA in proximity to a range of local and inter-city transit options.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 6:</b> Plan for changing demand in types of housing.</p>	<p><b>Consistent.</b> The Project would introduce a range of housing products on site, including 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units, providing for a range of housing types that would appeal to a variety of individuals and families with the flexibility to meet changing market demands.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 7:</b> Continue to protect stable, existing single-family areas.</p>	<p><b>Not Applicable.</b> This policy is not applicable to the Project as no existing single-family homes would be removed. Further, the Project site is in the Bunker Hill neighborhood, an area characterized by high density residential development and no nearby single-family zoned areas. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 8:</b> Ensure adequate access to open space and preservation of habitat.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City and does not apply to the Project. The Project site is within a highly urbanized area within the City of Los Angeles and does not contain any wildlife habitat of significant value or natural open space. The Project would introduce approximately 61,300 square feet of open space across both indoor and outdoor spaces. Further, the Project is introducing the “Oasis 350 Plan” on three levels of the proposed building: the ground floor, Level 6 podium roof, and Level 41 rooftop deck. A central component of this plan is the provision of green spaces, landscaping, and recreational amenities. Lastly, the Project would comply with the City of Los Angeles Landscape Ordinance by including 143 trees on and in rights-of-way adjacent to the Project site. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 9:</b> Incorporate local input and feedback on future growth.</p>	<p><b>Not Applicable/Consistent.</b> This policy is directed towards SCAG and would not necessarily apply to the Project. Nevertheless, the Project would serve to help meet the City’s critical need for additional housing units, especially in transit-rich areas, as outlined in the City’s <i>General Plan</i> “Housing Element,” itself a product of a robust planning effort involving substantial public input and feedback. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 1:</b> Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.</p>	<p><b>Consistent.</b> The Project would develop 570 new residential units, increasing housing supply in Downtown Los Angeles. Further, the Project would introduce a range of housing products, including 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units, attracting a diverse range of potential residents and affordability levels.</p>



Goals, Strategies, and Actions	Consistency Analysis
	<p>Moreover, the Project would introduce new housing units to an underutilized portion of an existing commercial structure currently used for office use and would thus not result in the displacement of any existing housing units.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 2:</b> Focus new growth around transit.</p>	<p><b>Consistent.</b> As stated above, the Project would introduce a new high-density residential development with 570 residential units to a site located in a highly urbanized area of the City of Los Angeles within a HQTAs and a TPA and is well served by transit, including a total of seven local and inter-city transit operators with a total of 32 bus stops within two blocks of the site.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 3:</b> Plan for growth around livable corridors, including growth on the Livable Corridors network.</p>	<p><b>Consistent.</b> SCAG identified strategies for implementing the Livable Corridors concept: transit improvements, active transportation improvements, and land use policies. The Project would be consistent with strategies for implementing the Livable Corridors concept through the Project’s introduction of a higher density residential development on an office and auto parking portion of an existing structure, as well as site pedestrian and bicycle infrastructure improvements.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 4:</b> Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.</p>	<p><b>Consistent.</b> The Project would introduce a high density residential development in the Downtown Los Angeles neighborhood, an area characterized by its concentration of housing, employment, and mix of retail and services in close proximity to each other, furthering attainment of the “complete communities” concept by enabling future residents to have their daily needs met in close proximity to the Project in a manner that would not necessitate the use of a personal automobile.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 5:</b> Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 6:</b> Protect natural and farm lands, including developing conservation strategies.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 7:</b> Preserve our existing transportation system.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 8:</b> Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>

Goals, Strategies, and Actions	Consistency Analysis
<p><b>2016-2040 RTP/SCS Land Use Strategy 9:</b> Promote safety and security in the transportation system.</p>	<p><b>Not Applicable.</b> This policy is directed towards SCAG and the City of Los Angeles and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 10:</b> Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.</p>	<p><b>Not Applicable.</b> This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The proposed project would not interfere with this larger goal of investing in the transportation system.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 11:</b> Promote zero-emissions vehicles.</p>	<p><b>Consistent.</b> The Project would comply with the provisions of the Los Angeles Green Building Code and the CALGreen code which include standards for the provision of electric vehicle charging stations capable of supporting future electric vehicle supply equipment. Specifically, the Project would include 30% of code required spaces as EV-ready with conduit and 10% would have installed charging stations.</p>
<p><b>2016-2040 RTP/SCS Land Use Strategy 12:</b> Implement shared mobility programs.</p>	<p><b>Not Applicable.</b> This strategy is directed towards SCAG and the City and does not apply to the Project. The Project would not be inconsistent with meeting this goal.</p>
<p><b>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 improvement, and efficient transportation infrastructure.</p>	<p><b>Consistent.</b> As discussed above, the Project will introduce 570 new residential units in a HQTa and TPA in an underutilized portion of an infill site current used as vehicle parking. The Project would provide a variety of dwelling units sizes: 9 studio units, 403 one-bedroom units, 151 two-bedroom units, and 7 three-bedroom units. Ground floor pedestrian improvements and added bicycle infrastructure and electric vehicle charging equipment would encourage both alternative and energy-efficient modes of transportation.</p>
<p><b>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.</p>	<p><b>Not Applicable.</b> Benefit 2 is directed towards SCAG and not does apply to the Project. Nevertheless, the Project is an infill residential project on an underutilized portion of a site located within a HQTa and a TPA in proximity to employment, retail, and entertainment, thereby decreasing time and cost of traveling between places. The Project would not be inconsistent with meeting this goal.</p>
<p><b>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>	<p><b>Consistent.</b> The Project includes numerous energy-efficient design features to comply with the City of Los Angeles Green Building Code and CALGreen. The Applicant has committed to implement additional water conservation measures above those required by code, specifically:</p> <ul style="list-style-type: none"> <li>• High Efficiency Toilets with a flush volume of 1.06 gallons per flush, or less.</li> <li>• Showerheads with a flow rate of 1.75 gallons per minute, or less, for residential units only.</li> </ul>

Goals, Strategies, and Actions	Consistency Analysis
	<ul style="list-style-type: none"> <li>• ENERGY STAR Certified Residential Dishwashers standard with 2.9 gallons/cycle or less</li> <li>• Drip/Subsurface Irrigation (Micro-irrigation)</li> <li>• Proper Hydro-zoning/Zoned Irrigation-(groups plants with similar water requirements together)</li> <li>• Artificial Turf</li> <li>• Drought Tolerant Plants - approximately 75 percent of total landscaping</li> </ul> <p>Further, the Project’s location near transit will provide future residents and visitors with various affordable transit options.</p>

**Benefit 4:** Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.

**Consistent.** The Project would encourage improved access and mobility by introducing 570 new residential units within a transit-rich urban area. Employment, retail, and entertainment surrounding the Project site are easily accessible by foot, bicycle, and transit. The Project would provide approximately 47,000 square feet of outdoor open space including balconies, rooftop garden, and a central green area for large community events. The Project program thus promotes improved placemaking and alternative modes of transportation that would utilize and concentrate new growth in existing an urban area.

*Source: SCAG, 2016–2040 RTP/SCS, April 2016.*

*Not Applicable: Actions/strategies are those that are not identified for implementation of local jurisdictions. The Project’s consistency with any actions/strategies identified for implementation by the local jurisdictions is assessed above.*

## Residential Floor Area

PRC Section 21155(b) states a SCEA is only applicable for a Transit Priority Project that contains at least 50 percent residential use, based on total building square footage or, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

The Project includes the removal of approximately 29,500 square feet of an existing 330,000-square-foot commercial building and the provision of a total of approximately 624,500 square feet of residential floor area, for a net total floor area of approximately 925,000 square feet. As such, the percentage of total building square footage that would be for residential uses would be 67%. The Project includes 570 new multifamily residential units and ancillary residential uses and amenities, which would include indoor community space, code-compliant outdoor open space, and related support areas, which collectively would comprise 100 percent of the new building. As such, the Project would be consistent with this criterion.

## Residential Density

PRC Section 21155(b) states a SCEA is only applicable for a Transit Priority Project that provides a minimum net density of at least 20 units per acre. The Project site includes an area of approximately 3.68 acres.

The Project includes 570 new multifamily residential units; as such, the Project provides approximately 154.9 dwelling units per acre. As such, the Project would be consistent with this criterion.

## Proximity to Transit

PRC Section 21155(b) states a SCEA is only applicable for a Transit Priority Project that is within one-half mile of a major transit stop or a high-quality transit corridor. 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 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." 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 PRC Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project area is well served by existing transit services, with multiple bus stops within a few blocks of the Project. Metro Rapid Lines 720 and 760, that operate at less than 15-minute intervals during peak hours, cross at Grand and 5th Streets. The 7th Street/Metro Center Station, at which the A, B, D and E Metro Rail lines meet, is located within ½ mile of the Project. The future Regional Connector Transit Corridor that will connect the Metro Gold Line to the Metro Blue and the Metro Expo Line will have a stop at 2nd Street and Hope Place. Moreover, the 2016-2040 RTP/SCS specifically identifies the Project Site as being within a HQT. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this criterion.