

Appendix H

Land Use Tables

IV. Environmental Impact Analysis

G. Land Use and Planning

1. Land Use Tables

**Table IV.G-1
Consistency with Applicable Goals of RTP/SCS**

Goal	Project Consistency
<p>Maximize mobility and accessibility for all people and goods in the region.</p>	<p>Consistent. The Project is an infill development within the urbanized Arts District of the downtown area. As with other communities within the City, the Project Site is surrounded by a network of roads and freeways that provide local and regional access. The Project Site is also located in proximity to several public transit opportunities. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality Transit Area (HQTA).¹ The 2016-2040 RTP / SCS defines HQTAs as generally walkable transit villages or corridors that are within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project is located near the intersection of Mateo Street and 7th Street. 7th Street is a major transportation corridor that is served by multiple Metro bus lines. Local and rapid Metro bus lines also run on E. 6th Street, Alameda Street, and Santa Fe Avenue. Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project the Project would maximize the potential for mobility and accessibility. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p>Consistent. The Project would encourage land use and growth patterns that facilitate transit by being a compact, infill development near several public transit options, including Metro bus lines.</p>

¹ SCAG 2016-2040 Regional Transportation Plan / Sustainability Communities Strategy, p. 77, Exhibit 5.1, High Quality Transit Areas in the SCAG Region for 2040, and, p. 189, Glossary for HQTA definition.

**Table IV.G-1
Consistency with Applicable Goals of RTP/SCS**

Goal	Project Consistency
	<p>Local and rapid Metro bus lines run on E. 7th Street, E. 6th Street, Alameda Street, and Santa Fe Avenue. In addition, the Project encourages active transportation by including 154 bicycle parking stalls. The Project also improves walkability in the immediate vicinity of the Project Site by replacing a warehouse use and surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options.</p> <p>The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project; however, as the flexibility option would increase commercial and reduce residential, a total of 161 bicycle parking stalls would be provided under this option, and, nonetheless would therefore be similarly consistent.</p>
<p><i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016; EcoTierra Consulting, 2020.</i></p>	

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
Chapter 1: Safety First	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	Consistent. As discussed in Section IV.K, Transportation , of this Draft EIR, the Project would prepare and implement a Construction Management Plan that would reduce construction-related impacts on the surrounding community, and would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Chapter 2: World Class Infrastructure	
Policy 2.1: Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	Consistent. The Project would develop a mix of live/work units, general commercial, restaurant, retail, office and art production-related land uses, thereby contributing to the diversity of land uses in the Arts District, which currently includes industrial, commercial retail, studio, bar, café, restaurant, and low-rise and mid-rise adaptive live/work units. Further, the Project would also conform with the Mobility Plan 2035 and its recommended street standards. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 2.3: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	Consistent. The Project would enhance the pedestrian access along Mateo Street and Imperial Street with new and additional landscape features such as street trees and provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The above analysis is equally applicable to the Flexibility Option as the design, including the landscaped paseo, configuration,

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
<p>Policy 2.4: Provide a slow speed network of locally serving streets.</p>	<p>and operation would be comparable to the Project and would therefore be similarly consistent.</p> <p>Consistent. Mateo Street is designated as a Neighborhood Enhanced Network (NEN) and is designated as a Tier 2 Bicycle Lane within the Bicycle Lane Network. This designates Mateo Street as a local street that is slow moving and safe enough to connect neighborhoods through active transportation, including bicycling. The Project Site is further accessed by a slow speed network of locally serving streets via Mateo Street (designated Avenue III), Imperial Street (designated Collector Street), Jesse Street (designated Collector Street), and 7th Street (designated Avenue II Street). All streets have no speed limit posted, thus a prima facie speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code. The above analysis is equally applicable to the Flexibility Option as the design, including the landscaped paseo, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2.5: Improve the performance and reliability of existing and future bus service.</p>	<p>Consistent. Public transit service in the immediate Project study area is currently provided by Metro. The bus lines include: Metro Local Lines 18, 53, 60, 62, 66 and Metro Rapid 720 and 760. Additionally, the Project Site is located approximately one mile south of the Metro Gold Line Little Tokyo/Arts District Station. Public bus/rail transit service within the Project study area will also be improved with the Metro Regional Connector project, which will be a 1.9-mile underground light-rail system that will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station. The Regional Connector will improve access to both local and regional destinations by providing continuous thru service between the Gold, Blue, Expo, Red, and Purple Lines and providing connectors to other rail lines via the 7th St/Metro Center Station. Furthermore, FASTLinkDTLA is the recently established TMO in Downtown Los Angeles that will improve public transit service in the area. TMOs provide employees, businesses, and visitors of an area with resources to increase</p>

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
	the amount of trips taken by transit, walking, bicycling, carpooling, and other alternative modes. The above analysis is equally applicable to the Flexibility Option as the design, including the landscaped paseo, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	Consistent. Mateo Street and Santa Fe Avenue are classified as Bicycle Friendly Streets. The Project would not modify existing bicycle facilities. The Project would enhance bicycle facilities on-site by providing short-term and long-term bicycle spaces in conformance with the City's Bicycle Ordinance. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 2.7: Provide vehicular access to the regional freeway system.	Consistent. Regional vehicular access to the Project Site is provided by the I-10 (Santa Monica) Freeway located approximately half a mile south of the Project Site, the US-101 (Hollywood) Freeway located approximately 1.2 miles north of the Project Site, and the I-5 (Santa Ana) Freeway located approximately half a mile east of the Project Site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.	Consistent. As discussed in Section II, Project Description , of this Draft EIR, vehicular access to the Project Site would be provided via a new driveway entrance off of Imperial Street towards the northeast corner of the Project Site that leads to the Project's parking spaces and loading areas. Therefore, all loading would occur off-street and internally to the Project Site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 2.17: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the	Consistent. The Project would include off-site improvements that would be generally contained in the adjacent rights-of-way to the Project Site. These off-site improvements would consist of

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
<p>widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.</p>	<p>sidewalk dedications, widenings (6' Mateo Street and 8' Imperial Street), and improvements; planting street trees; roadway circulation improvements; installing street lights (if required); and underground existing overhead powerlines. All dedications and improvements would be completed in compliance with Mobility Plan 2035. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Chapter 3: Access for All Angelenos</p>	
<p>Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral of the City's transportation system.</p>	<p>Consistent: The Project would promote this policy by improving pedestrian and bicycle access and providing adequate vehicular access. The Project would enhance the pedestrian access along Mateo Street and Imperial Street with new and additional landscape features such as street trees and provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The Project would promote the use of bicycles by providing access to short-term and long-term bicycle parking spaces on site. In addition, the Project would be located in an area well-served by public transit provided by Metro. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>Consistent. The Project would promote this policy by providing a new, mixed-use development with live/work units and commercial uses (general commercial, restaurant, retail, office and art production-related uses) on an underutilized infill lot within an urbanized area. The Project would provide access to new jobs within an urban area within proximity to Metro buses service. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable</p>

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
	to the Project and would therefore be similarly consistent.
<p>Policy 3.4: Provide all residents, workers, visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p>Consistent. The Project Site is located in an area well-served by public transit by Metro with bus service on E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.5: Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.</p>	<p>The Project is located near the intersection of Mateo Street and 7th Street. 7th Street is a major transportation corridor that is served by multiple Metro bus lines. Local and rapid Metro bus lines also run on E. 6th Street, Alameda Street, and Santa Fe Avenue. Given the Project Site’s location in proximity to a variety of transportation options and the infill nature of the Project the Project would maximize the potential for mobility and accessibility. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.</p>	<p>Consistent. The Project would provide bicycle parking spaces on-site in accordance with LAMC requirements. Consistent with the requirements, short-term bicycle parking spaces would be provided outside the building along the northern perimeter on the ground floor and long-term bicycle parking would be located within the first subterranean level of the parking garage. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.9: Discourage the vacation of public rights-of-way.</p>	<p>Consistent. No vacation of public rights-of-way are required by the Project or on the streets adjacent to the Project Site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.10: Discourage the use of cul-de-sacs that do not provide access for active transportation options.</p>	<p>Consistent. No cul-de-sacs are located in the vicinity of the Project Site. The above analysis is equally applicable to the Flexibility Option as the</p>

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
	design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Chapter 4: Collaboration, Communication & Informed Choices	
<p>Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.</p>	<p>Consistent. As discussed in Section IV.K, Transportation, of this Draft EIR, the Project applicant will adopt and implement a TDM program in order to mitigate the potentially significant Project-related traffic impacts to less than significant levels. In addition, the Project would be located in an area well-served by public transit provided by Metro, including bus routes along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue. The buses and subway provide access to areas around Los Angeles County including the west side/Santa Monica, downtown Los Angeles, San Fernando and San Gabriel Valley providing opportunities for transit use, thereby potentially reducing dependence on single-occupancy vehicles. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 4.13: Balance on-street and off-street parking supply with other transportation and land use objectives.</p>	<p>Consistent. The Project would provide approximately 287 vehicle parking spaces. In addition, the Project would provide 30 percent of its required parking spaces to be electric-vehicle ready, and ten percent of its required parking spaces would be provided chargers for electric vehicles within the parking structure on the Project Site. In addition, the Project would provide 154 bicycle parking spaces, comprised of 24 bicycle spaces for commercial uses (including 12 short-term spaces and 12 long-term spaces) and 130 spaces for the live/work uses (including 12 short-term and 118 long-term), which complies with LAMC requirements set forth in Ordinance No. 185,480. In addition, the Project would be located in an area well-served by public transit provided by Metro, including bus routes along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable</p>

**Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035**

Policy	Project Consistency
	to the Project and would therefore be similarly consistent.
<p>Policy 4.15: Require a public hearing for the proposed removal of an existing Class II or Class IV bicycle facility.</p>	<p>Consistent. The Project does not propose or require the removal of any Class II or Class IV bicycle facilities. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent</p>
<p>Chapter 5: Clean Environments & Healthy Communities</p>	
<p>Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.</p>	<p>Consistent. The Project supports reductions in VMT by providing housing within walking distance of a well-developed transit system, as well as within numerous retail, dining, and employment opportunities, and thus, provides opportunities for residents to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project by bicyclists. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.</p>	<p>Consistent. The Project's location near major transit facilities, which designates it in a TPA, could help reduce the energy and emission footprint of the Project and the per capita GHG emissions of the residents and visitors from private automobile travel. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.</p>	<p>Consistent. In accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan and Low Impact Development requirements throughout the operational life of the Project. The Standard Urban Stormwater Mitigation Plan would outline stormwater treatment measures or post-construction Best Management Practices required to control pollutants of concern. In addition, consistent with the City's Low Impact</p>

Table IV.G-2
Project Consistency with the Applicable Policies of the
Mobility Plan 2035

Policy	Project Consistency
	<p>Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent</p>
<p><i>Source: City of Los Angeles, Mobility Plan 2035, September 7, 2017; EcoTierra Consulting, 2020.</i></p>	

**Table IV.G-3
Project Consistency with the Applicable Objectives and Policies of the
General Plan Framework Element**

Objective/Policy	Project Consistency
Land Use Chapter	
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</p>	<p>Consistent. The Project would develop a mix of live/work units, general commercial, restaurant, retail, office and art production-related land uses, thereby contributing to the diversity of land uses in the Arts District, which currently includes industrial, commercial retail, studio, bar, café, restaurant, and low-rise and mid-rise adaptive live/work units. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.</p>	<p>Consistent. Downtown Los Angeles is identified as "Downtown Center" on the Framework's Long-Range Land Use Diagram (Metro Los Angeles). The Project would develop a mix of live/work units, general commercial, restaurant, retail, office and art production-related land use on a property that is comprised of an industrial building and surface parking. Mixed use projects with residential units are one of the land uses identified in the Long-Range Land Use Diagram as welcome in Downtown Los Angeles. The Project would bring employment opportunities and retail (restaurant) uses that would contribute to the diversity of uses that serve the needs of Downtown residents and visitors. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long- Range Land Use Diagram.</p>	<p>Consistent. As discussed in Sections IV.J, Public Services, IV.M, Utility and Service Systems, and IV.N, Energy, of this Draft EIR, as well as the Initial Study included in Appendix A.2 of this Draft EIR, the agencies that provide public infrastructure, services, and utilities to the Project Site would have capacity to serve the Project. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing</p>	<p>Consistent. While the Project does not provide any dedicated public parkland, the Project has been designed to create a pedestrian-oriented</p>

**Table IV.G-3
Project Consistency with the Applicable Objectives and Policies of the
General Plan Framework Element**

Objective/Policy	Project Consistency
<p>and future residents. These opportunities may include a citywide linear network of parkland sand trails, neighborhood parks and urban open spaces.</p>	<p>streetscape with publicly-accessible open spaces, including the pedestrian paseo. The Project would include approximately 15,320 square feet of useable open space, of which approximately 9,290 square feet would be outdoor common space. The common open space would be comprised of a range of amenities including paseo, swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. These common open spaces amenities would be located in distinct areas on the ground, second, and eighth levels and would not be accessible to the public or nearby residents, except that the paseo would be accessible to the public providing access to ground-floor commercial uses and open space dining areas and terrace on the second level. The paseo would provide a landscaped connection through the Property from Mateo Street to Imperial Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project, which would include the same amount of common open space and would therefore be similarly consistent.</p>
<p>Policy 3.1.5: Allow amendments to the community plans and coastal plans to further refine General Plan Framework Element land use boundaries and categories to reflect local conditions, parcel characteristics, existing land uses, and public input. These changes shall be allowed provided (a) that the basic differentiation and relationships among land use districts are maintained, (b) there is no reduction in overall housing capacity, and (c) additional environmental review is conducted in accordance with the California Environmental Quality Act should the impacts of the changes exceed the levels of significance defined and modify the conclusions of the Framework Element's Environmental Impact Report.</p>	<p>Consistent. The Project includes a request for a General Plan Amendment to amend the adopted Central City North Community Plan land use designation for the Project Site from Heavy Industrial to Regional Center Commercial. The Project also includes a Vesting Zone Change for the Project Site from M3 to C2. These changes would result in the Project Site being zoned for the mix of uses that would be included in the Project. The requested discretionary actions would provide an increase in the overall housing capacity for a total of 185 units, there would be no removal of existing housing causing a reduction in overall housing, and the Project would continue to maintain a diverse range of jobs in the City, area and neighborhood and therefore, the Project would be consistent with this Policy. Additionally, that the Project is undergoing CEQA review. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and</p>

**Table IV.G-3
Project Consistency with the Applicable Objectives and Policies of the
General Plan Framework Element**

Objective/Policy	Project Consistency
	operation would be comparable to the Project and would therefore be similarly consistent.
<p>Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p>Consistent. The Project would be designed to provide opportunities for people to live, work, and visit this area of downtown Los Angeles, with live/work units, general commercial, restaurant, retail, office and art production-related uses, and open space at a site adjacent to several Metro, LADOT and other regional transit bus lines, thus providing opportunities for residents, employees, visitors, and nearby local residents to use transit and active transportation, which would reduced vehicle trips and VMTs. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. The Project is a mixed-use development that would include live/work and commercial land uses. The Project would provide opportunities for residents, employees, and visitors to use public transit for work trips, and walk to other retail businesses within and near the Project Site. In addition, the Project would provide short- and long-term bicycle spaces as required by the City Bicycle Ordinance. 154 bicycle parking spaces would be provided on the Project Site, including 12 short-term bicycle parking spaces for the commercial uses and 12 short-term spaces for the live/work uses located near the northern perimeter on the ground floor. In addition, according to the City's 2010 Bicycle Master Plan, Mateo Street and Santa Fe Avenue are classified as Bicycle Friendly Streets. Mateo Street is also classified by the City's Mobility Plan 2035 as part of the Neighborhood Network (i.e., a network of local streets comfortable for bicycling) and future Tier 2 Bicycle Lanes. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project with the exception of providing 161 bicycle parking stalls due to the increase in commercial and reduction in residential, and would nonetheless be similarly consistent.</p>
<p>Objective 3.16: Accommodate land uses,</p>	<p>Consistent. The Project has been designed to</p>

**Table IV.G-3
Project Consistency with the Applicable Objectives and Policies of the
General Plan Framework Element**

Objective/Policy	Project Consistency
<p>locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.</p>	<p>create a pedestrian-oriented streetscape. The Project would provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The above analysis is equally applicable to the Flexibility Option as the design, including the landscaped paseo, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
Housing Chapter	
<p>Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.</p>	<p>Consistent. The Project would include up to 185 live/work units in the dense urban community of the Arts District in downtown Los Angeles, in close proximity to Metro bus services that are within walking distance. Metro runs multiple bus lines, including local and rapid lines, along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue in the area. The above analysis is equally applicable to the Flexibility Option, which would include 159 live-work units, as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
Urban Form and Neighborhood Design Chapter	
<p>Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.</p>	<p>Consistent. The Project will be a large mixed-use development that provides for continuous activity after commercial business hours through the development of ground floor retail and restaurant uses. The Project has been designed such that outdoor gathering and recreation areas within the Project Site are visible by Project residents, visitors and employees. Appropriate lighting and other security measures would be incorporated into the design and the residential areas of the site would be secured during nighttime hours and 24-hour security would be provided at the site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>

**Table IV.G-3
Project Consistency with the Applicable Objectives and Policies of the
General Plan Framework Element**

Objective/Policy	Project Consistency
<i>Economic Development Chapter</i>	
<p>Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.</p>	<p>Consistent. The Project would support this objective by providing a mixed-use development consisting of 185 live/work units and up to 23,380 square feet of commercial uses that would serve the community and future businesses. The proposed neighborhood-serving retail, restaurant, and office and art production-related uses would complement the employment base of the Central City North Community Plan area, meet the needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality. Furthermore, the Project would integrate sustainable and green building techniques by incorporating various standards and guidelines to reduce resources and energy consumption. The Flexibility Option would consist of 159 live/work units and up to 45,873 square feet of commercial uses that would serve the community and future businesses. Overall, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<i>Infrastructure and Public Services Chapter</i>	
<p>Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.</p>	<p>Consistent. As evaluated in Section IV.F, Hydrology and Water Quality, of this Draft EIR, during construction, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit. In accordance with the requirements of this permit, the Project would implement a Stormwater Pollution Prevention Plan that specifies Best Management Practices and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan and Low Impact Development</p>

**Table IV.G-3
Project Consistency with the Applicable Objectives and Policies of the
General Plan Framework Element**

Objective/Policy	Project Consistency
	<p>requirements throughout the operational life of the Project. The Standard Urban Stormwater Mitigation Plan would outline stormwater treatment measures or post-construction Best Management Practices required to control pollutants of concern. In addition, consistent with the City's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p>Consistent. See the consistency analysis for Policy 9.3.1., above. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p><i>Source: City of Los Angeles, The Citywide General Plan Framework Element; EcoTierra Consulting, 2020.</i></p>	

**Table IV.G-4
Project Consistency with Applicable Policies of the Housing Element**

Policies	Project Consistency
<p>Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.</p>	<p>Consistent. The Project would include up to 185 new live/work residences that would be added to the citywide housing supply. Furthermore, in recognition of the need for affordable housing within the Central City North Community Plan area, the Project sets aside 11 percent of its units, or 20 units total, deed-restricted for Very Low Income households.</p> <p>The proposed commercial land uses would provide amenities, jobs, and services to the Project's future residents, workers, and visitors, as well as the existing community. The Project Site is accessible to the regional bus transit systems. The above analysis is equally applicable to the Flexibility Option, which would include 159 live-work units (with 11 percent of the units deed-restricted for Very Low Income Households), as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.</p>	<p>Consistent. The Project would meet the requirements in the City's Green Building Code and would include the conservation measures discussed below, in Section (k) Los Angeles Green Building Code. Therefore, the proposed building would minimize the adverse effects on the environment through compliance with energy efficiency requirements, such as reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with California Title 24 Building Energy Efficiency Standards, as amended by the City. The proposed building would also minimize the use of non-renewable resources through achieving several objectives of the City of Los Angeles General Plan Framework Element, SCAG's 2016 RTP/SCS, and SCAQMD AQMP for establishing a regional land use pattern that promotes sustainability. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2.3.2: Promote and facilitate reduction of water consumption in new and existing housing.</p>	<p>Consistent. As described in Section IV.M.1, Utility and Service Systems-Water, of this Draft EIR, through City mandated conservation</p>

**Table IV.G-4
Project Consistency with Applicable Policies of the Housing Element**

Policies	Project Consistency
	<p>measures, the Project would include ultra low-flow toilets in all bathrooms, low-flow aerators, and appropriate landscaping, which would reduce water use by at least 50 percent. Therefore, the Project would minimize water consumption in the proposed residences and commercial uses. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2.3.3: Promote and facilitate reduction of energy consumption in new and existing housing.</p>	<p>Consistent. The Project would meet the requirements in the City’s Green Building Code. The Project would have numerous green building design features, including a highly efficient HVAC system. Refer to Section IV.N, Energy, of this Draft EIR, for further discussion. Therefore, the Project would minimize energy consumption. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2.3.4: Promote and facilitate reduction of waste in construction and building operations.</p>	<p>Consistent. As discussed in Section IV.M.3, Utility and Service Systems – Solid Waste, of this Draft EIR, much of the Project’s demolition waste would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill. During construction, the Project would implement recycling, such as recycling concrete cylinder test samples and steel reinforcing bars (Refer to PDF-SW-1 and PDF-SW-2 in Section IV.M.3, Utility and Service Systems-Solid Waste, of this Draft EIR). With respect to solid waste generated during operation, it is estimated that 65 percent of the Project’s solid waste would be diverted from a landfill as required by law (Refer to PDFs SW-3 through SW-5 in Section IV.M.3, Utility and Service Systems-Solid Waste, of this Draft EIR). Therefore, the Project would reduce solid waste generated during construction and operation. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>

Table IV.G-4
Project Consistency with Applicable Policies of the Housing Element

Policies	Project Consistency
<i>Source: Los Angeles Department of City Planning, Housing Element 2013-2021, adopted December 3, 2013; EcoTierra Consulting, 2020.</i>	

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
Residential	
<p>Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.</p>	<p>Consistent. The Project would include up to 185 live/work units in the dense urban community of the Arts District in downtown Los Angeles, in close proximity to Metro bus services that are within walking distance of the Project Site. Furthermore, in recognition of the need for affordable housing within the Community Plan area, the Project sets aside 11 percent of its units, or 20 units, for deed-restricted for Very Low Income households. The long-term affordability of these units would be guaranteed in conformance with the requirements of the City's Housing and Community Investment Department. The above analysis is equally applicable to the Flexibility Option, which would include 159 live-work units (with 11 percent of the units deed-restricted for Very Low Income Households), as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 1-1.1: Designate specific lands to provide for adequate multi-family residence development.</p>	<p>Consistent. The Community Plan designates the Project Site for Heavy Industrial land uses. However, the Project Applicant is requesting a General Plan Amendment to amend the adopted Central City North Community Plan's land use designation from the current "Heavy Industrial" land use designation to "Regional Center Commercial" land use designation. The Regional Center land use designation permits a range of corresponding commercial zones that allow for a variety of commercial and residential uses and intensities. Development of 185 live/work units and commercial land uses would serve the needs of existing and future residents in the area. The above analysis is equally applicable to the Flexibility Option, which would include 159 live-work units and approximately 45,873 square feet of commercial space, as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Objective 1-2: To locate new housing in a manner which reduces vehicular trips</p>	<p>Consistent. The Project would encourage land use and growth patterns that facilitate transit by</p>

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
<p>and makes it accessible to services and facilities.</p>	<p>being a compact, infill development near several public transit options, including E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue. In addition, the Project encourages active transportation by including 154 bicycle parking stalls. The Project also improves walkability in the immediate vicinity of the Project Site by replacing a warehouse use and surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options, which would be accessible to the live/work units on-site. The Project's building frontage would provide a variety of ground floor commercial uses along Mateo Street and Imperial Street. In addition, the publicly accessible pedestrian paseo would provide connectivity between the building's frontages. Furthermore, the Project would provide opportunities for employees, residents, and visitors to walk to other retail businesses within and near the Project Site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project; however, as the flexibility option would increase commercial and reduce residential, a total of 161 bicycle parking stalls would be provided under this option, and nonetheless would therefore be similarly consistent.</p>
Commercial	
<p>Policy 2-1.4: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.</p>	<p>Consistent. The Project would be an urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the Central City North Community Plan and the Central Industrial Redevelopment Project, which envisions the continued and expanded development of a thriving artists-in-residence community. Furthermore, the Project's height, bulk and massing is consistent with other mid-rise structures located along Mateo Street, the six-story mixed-use Toy Factory Lofts and the seven-story mixed-use Biscuit Company Lofts. The Project would feature sculptural elements, including a custom-shaped freestanding building that emerges from a single-story base oriented</p>

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
	<p>west toward the Industrial Street/Mateo Street T-intersection. The materials palette is intended to complement the decorative brick of surrounding buildings and the texture of corrugated metal. There would also be opportunities for wall art on the north-facing wall along the ground level. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2-2.2: New development needs to add to and enhance the existing pedestrian street activity.</p>	<p>Consistent. The Project has been designed to create a pedestrian-oriented streetscape. The Project would provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east-west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The above analysis is equally applicable to the Flexibility Option as the design, including the landscaped paseo, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2-2.3: Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.</p>	<p>Consistent. The Project's commercial uses would be located on the ground level fronting Mateo Street and Imperial Street. The commercial uses would include general commercial, restaurant, retail, office and art production-related uses. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2-3.1: New development needs to add to and enhance the existing pedestrian activity.</p>	<p>Consistent. The Project has been designed to create a pedestrian-oriented streetscape. The Project would provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east-west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The above analysis is equally applicable to the Flexibility Option as the design, including the</p>

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
	landscaped paseo, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
<p>Policy 2-3.2: New development in pedestrian oriented areas shall provide parking at the rear of the property.</p>	<p>Consistent. Vehicular access to the Project Site would be provided via a new driveway entrance off of Imperial Street and parking for the Project Site would be located in three subterranean levels. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2-3.3: Identify pedestrian oriented areas as preferred locations for mixed use projects.</p>	<p>Consistent. The Project is a mixed-use development located at the eastern edge of downtown Los Angeles and provides an opportunity to both increase and take advantage of existing pedestrian activity in the Project area, which is currently comprised of similar uses, including the six-story mixed-use Toy Factory Lofts and the seven-story mixed-use Biscuit Company Lofts, which are both located across Mateo Street to the west and the new seven-story mixed-use Amp Lofts, which is currently under construction on a parcel directly east of the Project Site, across Imperial Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 2-3.4: Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.</p>	<p>Consistent. The Project's commercial uses would be located on the ground level fronting Mateo Street and Imperial Street. The commercial uses would include general commercial, restaurant, retail, office and art production-related uses. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Objective 3-2: Encourage the continued development and maintenance of the artists-in-residence community in industrial areas of the proposed redevelopment plan areas and of the plan, as appropriate.</p>	<p>Consistent. The Project Site has a General Plan land use designation of Heavy Industrial under the Central City North Community Plan and is located within the Central Industrial Redevelopment Project area. The Project includes development of 185 live-work units over ground-floor commercial uses, including art</p>

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
	production-related uses, thereby adding to the already artists-in-residence uses in the area. The above analysis is equally applicable to the Flexibility Option, which would include 159 live-work units, as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Public and Institutional Land Use (Police Protection)	
Policy 8-1.1: Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.	Consistent. As discussed in Section IV.J.2, Public Services – Police Protection , of this Draft EIR, the LAPD was contacted to review the impacts of the Project. Refer to Section IV.J.2, Public Services – Police Protection , of this Draft EIR for additional analysis pertaining to impacts on police protection services. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 8-2.2: Ensure that landscaping around buildings be placed so as not to impede visibility.	Consistent. As described in Section IV.J.2, Public Services – Police Protection , of this Draft EIR, the Project shall comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. This includes in limiting visual obstruction and infrequently accessed “dead zones”. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Policy 8-2.3: Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.	Consistent. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light spillover onto adjacent properties. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Public and Institutional Land Use (Fire Protection)	

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
<p>Policy 9-1.1: Coordinate with the Fire Department the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.</p>	<p>Consistent. As discussed in Section IV.J.1, Public Services – Fire Protection, of this Draft EIR, the LAFD was contacted to review the impacts of the Project. Refer to Section IV.J.1, Public Services – Fire Protection, of this Draft EIR for additional analysis pertaining to impacts on fire protection services. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
Transportation	
<p>Policy 14-1.1: Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto the arterial.</p>	<p>Consistent. Vehicle access into the shared parking garage for the commercial and live/work uses would be available only from Imperial Street to the three subterranean levels of the parking garage. Thereby, limiting the amount of access points. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Policy 16-1.1: Maintain a satisfactory LOS for streets and highways that should not exceed LOS “D” for Major Highways, Secondary Highways, and Collector Streets. If existing levels of service are LOS “E” or LOS “F” on a portion of a highway or collector street, then the level of service for future growth should be maintained at LOS “E”.</p>	<p>Consistent. As discussed in Section IV.K, Transportation, of this Draft EIR, the Existing With Project scenario indicates that the Project is not expected to create a significant impact at any of the 10 study intersections. Incremental, but not significant, impacts are noted at the study intersections. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
Historic and Cultural Resources	
<p>Policy 18-1.1: Support the existing artists community in Central City North as a cultural resource for the community.</p>	<p>Consistent: The Project includes development of 185 live-work units that would each have a minimum of 150 square feet of workspace with high ceilings that would offer production space for a variety of mediums. The Project’s ground-floor commercial uses would also include general commercial, restaurant, retail, office and art production-related uses. Furthermore, there would be an arts production/gallery space for residents to utilize and program in order to support their crafts. The above analysis is equally applicable to the Flexibility Option, which</p>

**Table IV.G-5
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan**

Policies	Project Consistency
	would include 159 live-work units, as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
<i>Source: City of Los Angeles, Central City North Community Plan, December 15, 2000; EcoTierra Consulting, 2020.</i>	

**Table IV.G-6
Consistency with Applicable Design Policies of the Central City North
Community Plan**

Policies	Project Consistency
A. Commercial 1. Site Planning	
a. Locating surface parking to the rear of structures.	Consistent. All parking would be located in a shared parking garage for the commercial and live/work uses. Access would be available from Imperial Street to the three subterranean levels of the parking garage. There would be no surface parking. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
b. Minimizing the number of widths of driveways providing sole access to the rear of commercial lots.	Consistent. Vehicle access to the parking garage would be provided via one driveway on Imperial Street. The width of driveways would meet and not exceed the standard width identified as necessary to accommodate vehicles and all parking areas. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
c. Maximizing retail and commercial service uses along street level frontages of commercial developments.	Consistent. The Project's commercial uses would be located on the ground level fronting Mateo Street and Imperial Street, and some commercial uses would be located on the second floor. A paseo, that would be accessible to the public, would provide access to ground-floor commercial uses and open space dining areas and terrace on the second level. The commercial uses would include general commercial, restaurant, retail, office and art production-related uses. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
d. Providing front pedestrian entrances for businesses fronting on main commercial streets.	Consistent. Pedestrian access into the Project would be provided via both Imperial Street and Mateo Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
e. Providing through arcades from the front of buildings to rear parking for projects within wide frontages.	Consistent. The Project has been designed to create a pedestrian-oriented streetscape, including a paseo. The paseo would be

**Table IV.G-6
Consistency with Applicable Design Policies of the Central City North
Community Plan**

Policies	Project Consistency
	<p>accessible to the public providing access to ground-floor commercial uses and open space dining areas and terrace on the second level. The paseo would provide a landscaped connection through the Project Site from Mateo Street to Imperial Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project, including the same amount of common open space, and would therefore be similarly consistent.</p>
A. Commercial 2. Commercial (Height and Building Design)	
b. Providing accenting, complimentary building materials to building facades.	<p>Consistent. Throughout the Project, there would be a variety of textures, materials, signage, and architectural features appropriate for each function. The corner of the building, at the intersection of Industrial Street and Mateo Street, would consist of metal and glass. The remainder of the Mateo Street façade above ground level would consist of masonry and a regular grid of large windows. The materials palette is intended to complement the decorative brick of surrounding buildings and the texture of corrugated metal. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
c. Maximizing the applications of architectural features or articulations to building facades.	<p>Consistent. Throughout the Project, there would be a variety of textures, materials, signage, and architectural features. The corner of the building, at the intersection of Industrial Street and Mateo Street, would consist of metal and glass. The remainder of the Mateo Street façade above ground level would consist of masonry and a regular grid of large windows. Furthermore, the Project's building frontage would provide a variety of commercial uses on along Mateo Street and Imperial Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
d. Designating architecturally untreated facades for signage.	<p>Consistent. The signage for the Project would comply with the sign standards set forth in the LAMC (various sections of LAMC 12.21.A.4).</p>

**Table IV.G-6
Consistency with Applicable Design Policies of the Central City North
Community Plan**

Policies	Project Consistency
	The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
e. Screening of mechanical and electrical equipment from public view	Consistent. The Project building is proposed to be 8 stories, 110 feet tall. All rooftop equipment would be screened from potential public view. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
f. Requiring the enclosure of trash areas for all projects.	Consistent. All trash areas would be enclosed and screened from view within the subterranean parking area. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
A. Commercial 5. Commercial (Light and Glare)	
a. Installing on-site lighting along all pedestrian walkways and vehicular access ways.	Consistent. Project lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn. In addition, nighttime lighting would provide a comfortable experience for patrons of the commercial and restaurant uses. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
b. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses.	Consistent. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light spillover onto adjacent properties. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
A. Commercial 6. Commercial (Mixed Use)	
Maximize commercial uses on the ground floor by requiring 10% of	Consistent. The Project includes development of live-work units over ground-floor general commercial, restaurant, retail, office and art

**Table IV.G-6
Consistency with Applicable Design Policies of the Central City North
Community Plan**

Policies	Project Consistency
commercial development to serve needs of the residential portion of the building.	production-related uses. The commercial uses would generate employment as well as serve the needs of the residential users of the building and the employees/patrons/residents of the existing live/work, commercial, and industrial uses surrounding the Project Site as well as nearby residents. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
C. Multiple Residential 1. Site Planning	
a. Requiring usable open space for outdoor activities, especially for children.	Consistent. The Project would include approximately 15,320 square feet of useable open space, of which approximately 9,290 square feet would be outdoor common space for the residents to utilize. The common open space available to the live/work residents would include a swimming pool and spa, fitness and recreation rooms, rooftop urban garden for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. These common open spaces amenities would be located in distinct areas on the second and eighth levels and would not be accessible to the public or nearby residents. The paseo would be accessible to the public providing access to ground-floor commercial uses and open space dining areas and terrace on the second level. The paseo would provide a landscaped connection through the Property from Mateo Street to Imperial Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project, including the same amount of common open space and an approximately 450 square feet reduction in private open space commensurate to the reduction in live/work units, and would therefore be similarly consistent.
<i>Source: City of Los Angeles, Central City North Community Plan, December 15, 2000; EcoTierra Consulting, 2020.</i>	

**Table IV.G-7
Consistency with Applicable Policies of the Healthy LA Plan**

Policies	Evaluation of Project Consistency
Chapter 2 – A City Built for Health	
<p>Policy 2.2 Healthy Building Design and Construction: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools practices, and programs.</p>	<p>Consistent. The Project would promote a healthy built environment by replacing an underused site with a healthy living and working conditions development by providing an enhanced pedestrian-oriented design that would feature sculptural elements, including a materials palette that is intended to complement the decorative brick of surrounding buildings and the texture of corrugated metal. There would also be opportunities for wall art on the north-facing wall along the ground level. The Project’s building frontage would provide a variety of commercial uses along Mateo Street and Imperial Street. In addition, the publicly accessible pedestrian paseo would provide connectivity between the building’s frontages. The Project includes common open space that would be comprised of a range of amenities including paseo, swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. Night lighting for the Project would be provided to illuminate building entrances, driveways, commercial use, and for security purposes. In addition, the Project encourages active transportation by including 154 bicycle-parking stalls, including 12 short term stalls for the on-site commercial uses. The above analysis is equally applicable to the Flexibility Option with its 161 bicycle parking stalls to accommodate the increased commercial uses, as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
Chapter 5 – An Environment Where Life Thrives	
<p>Policy 5.7 Land Use Planning For Public Health and GHG Emission Reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.</p>	<p>Consistent. In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of building technologies and design features, such as high efficiency toilet and urinals, low flow showerheads and private and commercial faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, water-conserving turf, high-efficiency residential and</p>

**Table IV.G-7
Consistency with Applicable Policies of the Healthy LA Plan**

Policies	Evaluation of Project Consistency
	<p>commercial clothes washers, water-saving pool filters, and leak detection systems for pools and jacuzzis, that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. The Project's energy efficiency features and location near major transit facilities, which designates it in a TPA, could help reduce the energy and emission footprint of the Project and the per capita GHG emissions of the residents and visitors from private automobile travel. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p><i>Source: City of Los Angeles, Plan for a Healthy Los Angeles, March 2015; EcoTierra Consulting, 2020.</i></p>	

**Table IV.G-8
Project Consistency with Applicable Goals of the
Central Industrial Redevelopment Plan**

Goals	Project Consistency
<p>Goal 4: A safe and secure environment for businesses, employees, residents and visitors, and which is sustainable by the Central Industrial community as a whole.</p>	<p>Consistent. As described in Section IV.J.2, Public Services – Police Protection, of this Draft EIR, the Project shall use natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. This includes in limiting visual obstruction and infrequently accessed “dead zones”. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Objective 4.7: Reduce crime, graffiti and vandalism, and secure safety and livability for residents, businesses, employees and visitors in the Project Area through such items as environmental prevention techniques, enhanced lighting and landscaping, among others.</p>	<p>Consistent. As described in Section IV.J.2, Public Services – Police Protection, of this Draft EIR, the Project shall comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. This includes in limiting visual obstruction and infrequently accessed “dead zones”. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Goal 11: Sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability.</p>	<p>Consistent. The Project would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. The Project would conform to the requirements in the City’s Green Building Code.</p> <p>Some of the Project’s key design features that contribute to energy efficiency include the installation of energy efficient appliances, water efficient irrigation systems, water efficient indoor fixtures, use of locally sourced construction materials, and the installation of the conduit and panel capacity to accommodate future electric</p>

**Table IV.G-8
Project Consistency with Applicable Goals of the
Central Industrial Redevelopment Plan**

Goals	Project Consistency
	vehicle charging stations. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Objective 11.4: Encourage waste - resource matching and recycling.	As described in Section IV.M.3, Utility and Service Systems – Solid Waste , of this Draft EIR, the Project would include enclosed trash areas and recycling storage areas. It would comply with AB 939 requirements and approximately 50 percent of the Project’s waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.

Source: City of Los Angeles, Redevelopment Plan for Central Industrial Redevelopment Project, adopted November 15, 2002; EcoTierra Consulting, 2020.

**Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines**

Objective	Project Consistency
<p>Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.</p>	<p>The evaluation of the Project's consistency with sub-categories under this guideline is provided below.</p>
<p>Site Planning Provide direct access to the surrounding neighborhood and amenities, including transit.</p>	<p>Consistent. The Project would be accessible to the regional bus transit systems. 7th Street is a major transportation corridor that is served by multiple Metro bus lines. Local and rapid Metro bus lines also run on E. 6th Street, Alameda Street, and Santa Fe Avenue.</p> <p>Pedestrian access to the Project's various components would be provided from Mateo Street and Imperial Street via a paseo into the Project and building entrances oriented along these streets. Pedestrian access to the commercial spaces on the second level would be accessible from the Project's courtyard deck via elevators and stairs. Pedestrian access to the live/work component would also be accessible from Mateo Street and Imperial Street, with Mateo Street providing the primary access to the live/work lobby. Pedestrian wayfinding signage and security lighting would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors in accordance with the LAMC. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Use ornamental low-level lighting to highlight and provide security for pedestrian paths and entrances. Ensure that all parking areas and pedestrian walkways are illuminated.</p>	<p>Consistent. Project lighting would include architectural lighting, interior lighting, and exterior lighting for security and wayfinding purposes. Exterior lights would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Other illuminated areas would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. The above</p>

**Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines**

Objective	Project Consistency
	analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
<p>Building Design Promote pedestrian activity by placing entrances at grade level or slightly above, and unobstructed from view from the public right-of-way. Entryways below street level should be avoided.</p>	<p>Consistent. The Project would not include any below street level pedestrian entries. Pedestrian access to the Project's various components would be provided from Mateo Street and Imperial Street via a paseo into the Project and building entrances oriented along these streets. Pedestrian access to the commercial spaces on the second level would be accessible from the Project's courtyard deck via elevators and stairs, which would be centrally located on the Project Site. Pedestrian access to the live/work component would also be accessible from Mateo Street and Imperial Street, with Mateo Street providing the primary access to the live/work lobby. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Prioritize the use of stairs by locating near the building's entrance and directly on the primary paths of travel.</p>	<p>Consistent. Pedestrian access to the Project's various components would be provided from Mateo Street and Imperial Street via a paseo into the Project. Pedestrian access to the commercial spaces on the second level would be accessible from the Project's courtyard deck via elevators and stairs. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent</p>
<p>Guideline 2: Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.</p>	<p>The evaluation of the Project's consistency with the subtopic under this guideline is provided below.</p>
<p>Site Planning Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On</p>	<p>Consistent. Pedestrian access to the Project's various components would be provided from Mateo Street and Imperial Street via a paseo into the Project and building entrances oriented along these streets. Pedestrian access to the live/work</p>

Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
corner lots, parking should be oriented as far from the corner as possible.	component would also be accessible from Mateo Street and Imperial Street, with Mateo Street providing the primary access to the live/work lobby. Vehicle access into the shared parking garage for the commercial and live/work uses would be available via one access point from Imperial Street to the three subterranean levels of the parking garage. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Minimize both the number of driveway entrances and overall driveway widths.	Consistent. The existing curb cut along Mateo Street would be removed. Vehicle access into the shared parking garage for the commercial and live/work uses would be available via one access point from Imperial Street. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.	Consistent. Vehicles would enter the Project from Imperial Street. There would be a designated loading area within the ground floor of the building. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Orient vehicular access as far from street intersections as possible.	Consistent. Vehicle access into the shared parking garage for the commercial and residential uses would be available via Imperial Street, midblock. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.	Consistent. Delivery vehicles would enter the Project from Imperial Street, where there would be a designated loading area within the ground floor of the building. Pedestrian access to the Project's various components would be provided from Mateo Street and Imperial Street via a paseo into the Project

**Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines**

Objective	Project Consistency
	<p>and building entrances oriented along these streets. Pedestrian access to the live/work component would also be accessible from Mateo Street and Imperial Street, with Mateo Street providing the primary access to the live/work lobby. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.</p>	<p>The evaluation of the Project's consistency with the subtopic under this guideline is provided below.</p>
<p>Building Design Locate active ground floor uses along primary street frontages.</p>	<p>Consistent. The Project promotes an enhanced pedestrian-oriented design with ground floor retail uses along Mateo Street and Imperial Street, outdoor dining facilities, open space and recreation facilities for tenants, guests and the public. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Locate the majority of code-required open space at the ground level in a manner that is equally accessible to all residential units to promote safety and the use of outdoor areas. In mid- and high-rise buildings, podiums between buildings and rooftop areas can be used as common areas.</p>	<p>Consistent. The Project is designating 11 percent of its live/work units for Very Low Income households, and therefore is requesting to utilize an on-menu incentive for up to a 20 percent reduction in the amount of required open space. The Project would include approximately 15,320 square feet of open space and residential amenities that would be located in several distinct areas, generally located on the ground, second, and eighth level. The Project's various amenities would include including a swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. In addition, a number of live/work units would include private balconies. The Project would also provide a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its</p>

**Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines**

Objective	Project Consistency
	adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project, including the same amount of common open space, and would therefore be similarly consistent.
<p>Right-of-Way Identify opportunities to utilize the curb lane for one or more of the following: bus boarding pad, bicycle or scooter parking, passenger pick-up and drop-off areas, bicycle lane or parklet, in collaboration with Department of Transportation.</p>	<p>Consistent. The Project would provide short- and long-term bicycle spaces as required by the City Bicycle Ordinance. 12 short-term bicycle parking spaces for the commercial uses and 12 short-term spaces for the live/work uses would be located near the northern perimeter on the ground floor, thereby providing direct access to bicycle parking. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project; however, as the flexibility option would increase commercial and reduce residential, a total of 23 short-term bicycle parking spaces for the commercial uses and 10 short-term spaces for the live/work uses would be provided under this option, and nonetheless would therefore be similarly consistent.</p>
<p>Guideline 4: Organize and shape projects to recognize and respect surrounding context.</p>	<p>The evaluation of the Project’s consistency with the subtopic under this guideline is provided below.</p>
<p>Site Planning Lay out the site to ensure that access and building entrances are clearly legible.</p>	<p>Consistent. Pedestrian wayfinding signage and security lighting would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors in accordance with the LAMC. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Building Design Modulate building massing vertically and horizontally to a scale compatible to its context.</p>	<p>Consistent. To reduce the massing of the Project, the Project would be articulated with a variety of breaks along the Mateo Street and Imperial Street frontage, which would also provide visual interest. The design of the building incorporates differing color palette</p>

**Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines**

Objective	Project Consistency
	and architectural appearance with varying roof lines and breaks to reduce the overall sense of perceived mass. Portions of the Project building would also be set back from the property line. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Guideline 5: Express a clear and coherent architectural idea.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
<p>Building Design Design lighting to enhance the ground floor environment or to emphasize key architectural features without projecting light into the night sky. Utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage.</p>	<p>Consistent. Illuminated areas would be localized and would minimize light trespass and spill. Exterior lights would be wall mounted or ground mounted and shielded away from adjacent land uses to ensure no light spillage. Other illuminated areas would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
<p>Site Planning Plant trees and/or install shade structures to increase comfort and provide passive cooling opportunities. Provide canopy trees in planting areas for shade and energy efficiency, especially on south and southwest facing façades.</p>	<p>Consistent. A total of 11 new street trees, along with low-growing vegetation would be incorporated into the landscape plan. The street trees would be comprised of Western Redbud (<i>Cercis occidentalis</i>) and Coast Live Oak (<i>Quercus agrifolia</i>) and would provide shade along the perimeter of the Project Site, including the south facing façade. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>

**Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines**

Objective	Project Consistency
<p>Install a publicly accessible Electric Vehicle charging station and/or space for car-share providers on the project site, if the site and context is suitable.</p>	<p>Consistent. the Project would provide 30 percent of its required parking spaces to be electric-vehicle ready, and ten percent of its required parking spaces would be provided chargers for electric vehicles within the parking structure on the Project Site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Integrate solar powered lighting to increase energy efficiency.</p>	<p>Consistent. The Project would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements. The Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.</p>	<p>The evaluation of the Project’s consistency with the subtopic under this guideline is provided below.</p>
<p>Site Planning Facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse stormwater for landscape irrigation.</p>	<p>Consistent. In accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan and Low Impact Development requirements throughout the operational life of the Project. The Standard Urban Stormwater Mitigation Plan would outline stormwater treatment measures or post-construction Best Management Practices required to control pollutants of concern. In addition, consistent with the City’s Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation</p>

Table IV. G-9
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
	would be comparable to the Project and would therefore be similarly consistent.
Select plant species that are adapted and suitable for the site's specific soil conditions and microclimate.	Consistent. Landscaping would consist of low water use and drought tolerant landscaping that is suitable to the Project Site. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
<i>Source: Citywide Design Guidelines, adopted October 24, 2019; EcoTierra Consulting, 2020.</i>	

