# 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 2020-2045 RTP/SCS

Goal **Project Consistency** Improve mobility, accessibility, reliability, and **Consistent.** The Project is an infill development travel safety for people and goods. within the urbanized Arts District of Downtown Los Angeles. As with other communities within the City, the Project Site is surrounded by a mature network of roads and freeways that provide local and regional access. The Project Site is also located in proximity to several public transit opportunities and major employment centers. 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).<sup>1</sup> The 2020-2045 RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within one half-mile of a wellserviced transit stop or a transit corridor with 15minute or less service frequency during peak commute hours. The Project is located near the intersections of Alameda Street and 4th Street and Alameda Street and 6<sup>th</sup> Street. 4<sup>th</sup> and 6<sup>th</sup> Streets are major transportation corridors that are served by multiple Metro, LADOT, and MBL bus lines. Local and rapid Metro bus lines also run in the Project Site vicinity on Central Avenue, Alameda Street, and Palmetto Street. LADOT provides a DASH Downtown A line, the nearest stop of which is located at E. 4th Place and Hewitt Street, approximately 1,100 feet to the north of the Project Additionally, the Little Tokyo/Arts District Metro Gold Line Light Rail Station is located approximately 0.6 mile to the north of the Project Site. Given the Project Site's location in proximity to a variety of transportation options, employment centers and community resources, and the infill nature of the Project the Project would improve the potential for mobility and accessibility.

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 2020-2045 RTP/SCS

	DIE GOAIS OF 2020-2045 RTP/SCS
Goal	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.
Increase person and goods movement and	
Increase person and goods movement and travel choices within the transportation system.	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 the Metro Little Tokyo/Arts District Metro Gold Line Light Rail Station and multiple bus lines, including local and rapid lines, that run along E. 6 <sup>th</sup> Street, Central Avenue, and E. 7 <sup>th</sup> Street. In addition, the Project encourages active transportation by including 180 bicycle parking stalls. The Project also improves walkability in the immediate vicinity of the Project Site by replacing vacant warehouse uses and a surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options.  As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project.
Reduce greenhouse gas emissions and improve air quality.	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 sustainable design features, including water-conservation 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 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

Table IV.G-1
Consistency with Applicable Goals of 2020-2045 RTP/SCS

	Project Consistency
Goal	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. Therefore, the Project would be consistent with this policy. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	would therefore be similarly consistent.  Consistent. The Project would include up to 220 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 would set aside 11 percent of its units, or 25 units total, for deed-restricted for Very Low Income households.  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 and local bus transit systems.  The above analysis is equally applicable to the Flexibility Option, which would include 200 live-
Source: Southern California Association of Cou	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.

Source: Southern California Association of Governments, 2020-2045 RTP/SCS, September 2020; EcoTierra Consulting, 2020.

Table IV.G-2
Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element

General Plan	Framework Element
Objective/Policy	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. The Project would develop a mix of live/work units, general commercial, restaurant, retail, office and art production-related uses 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 and providing uses that would meet the needs of the Art District's existing and future residents, businesses 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.
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.	Consistent. Downtown Los Angeles is identified as "Downtown Center" on the Framework's Long-Range Land Use Diagram (Metro Los Angeles). The Project would promote this policy since the Project would develop a mix of live/work units, general commercial, restaurant, retail, office and art production-related uses on a property that is comprised of vacant industrial buildings 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 visitor and, therefore, the Project would be consistent with this policy. 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 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.	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 and, therefore, the Project would be consistent with this

policy.

Table IV.G-2
Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element

General Plan	Framework Element
Objective/Policy	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.
Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland sand trails, neighborhood parks and urban open spaces.	Consistent. While the Project does not provide any dedicated public parkland, the Project would promote this policy since the Project has been designed to create a pedestrian-oriented streetscape with new publicly-accessible open spaces, including the pedestrian paseos. The Project would include approximately 22,725 square feet of useable open space, of which approximately 18,719 square feet would be outdoor common space. The Project's various amenities would include a swimming pool and deck, outdoor areas for lounging, indoor amenities, such as fitness and recreational rooms, a resident art gallery, and plaza and pedestrian paseo areas. The 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 paseos would be accessible to the public providing access to ground-floor commercial uses and an outdoor lounge on the second level. Therefore, the Project would be consistent with this policy.  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.
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	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 220 units, there would be no removal of existing housing causing a reduction in overall

Table IV.G-2
Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element

	Framework Element
Objective/Policy	Project Consistency
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.	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, the Project is undergoing CEQA review. 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 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.	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 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.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	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. 180 bicycle parking spaces would be provided on the Project Site, including 17 short-term bicycle parking spaces for the commercial uses and 14 short-term spaces for the live/work uses located near the northeastern perimeter on the ground floor. Therefore, the Project would be consistent with this policy. 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 179 bicycle parking stalls due to the increase in commercial and reduction in residential, and would nonetheless be similarly consistent.

Table IV.G-2

#### **Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element** Objective/Policy **Project Consistency** Objective 3.16: Accommodate land uses. Consistent. The Project has been designed to locate design buildings, create a pedestrian-oriented streetscape through and and implement streetscape amenities implementing sidewalk bump-outs that allow for that enhance pedestrian activity. expanded widths of sidewalks to be furnished with landscaping and other street furniture. Also within the Project, pedestrian activity would be further enhanced through the inclusion of two landscaped pedestrian paseos. The paseo from Seaton Street would be located mid-Project and provide a 30foot by 30-foot pedestrian entry into the internal courtyard. The paseo from E. 5<sup>th</sup> Street would 22-foot wide provide а breezeway approximately 100 feet that also meets at the internal courtvard. 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. Housing Chapter Objective 4.2: Encourage the location of Consistent. The Project would include up to 220 new multi-family housing development to live/work units in the dense urban community of occur in proximity to transit stations, along the Arts District in downtown Los Angeles, in close some transit corridors, and within some proximity to Metro bus services that are within activity areas with adequate walking distance on a low intensity, infill site that currently has no housing units. Metro bus lines in transitions and buffers between higherdensity developments and surrounding the area include the Metro Little Tokyo/Arts District

lower-density residential neighborhoods.

Metro Gold Line Light Rail Station and multiple bus lines, including local and rapid lines, that run along E. 6th Street, Central Avenue, and E. 7th Street. The above analysis is equally applicable to the Flexibility Option, which would include 200 livework units, as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.

#### **Urban Form and Neighborhood Design Chapter**

Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

Consistent. The Project will be a 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

Table IV.G-2 **Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element** 

	I Idiliework Liellielit
Objective/Policy	Project Consistency
	Project 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.
Economic Development Chapter	
Objective 7.2: Establish a balance of land	Consistent. The Project would support this
uses that provides for commercial and	objective by providing a mixed-use development
industrial development which meets the	consisting of 220 live/work units and up to 46,548
needs of local residents, sustains	square feet of commercial uses that would serve
economic growth, and assures maximum	the community and future businesses. The
feasible environmental quality.	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 200
	live/work units and up to 64,313 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.
Infrastructure and Public Services Chap	
Policy 9.3.1: Reduce the amount of	1
hazardous substances and the total	Hydrology and Water Quality, of this Draft EIR,

amount of flow entering the wastewater system.

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

Table IV.G-2
Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element

Objective/Policy	Project Consistency
Objective/Policy	Project Consistency
	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 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. Therefore, the Project would be consistent with this policy. 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>Objective 9.6:</b> Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	<b>Consistent.</b> See the consistency analysis for Policy 9.3.1. 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 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	Consistent. As evaluated in Section IV.M, Utility and Service Systems – Water Supply and Infrastructure of this Draft EIR, the Project would be within the Los Angeles Department of Water and Power's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.  The above analysis is equally applicable to the Flexibility Option as the design, configuration, and

# Table IV.G-2 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.
Source: City of Los Angeles, The Citywide General Plan Framework Element; EcoTierra Consulting, 2020.	

### Table IV.G-3

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 (refer to PDF TR-1) 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 pubic streets and highways and, therefore, the Project would be consistent with this policy. 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	
<b>Policy 2.1:</b> 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 mixed- use development with live/work units and commercial uses (general commercial, restaurant, retail, office and art production-related 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 Project is proposing to implement a modified street classification, the Living Streets initiative. The Living Street initiative is Green LA's effort to create safe streets for all uses through increased sidewalk widths, adding sidewalk bump-outs, landscaping, and street furniture, and narrowed travel lanes to slow vehicles. To establish this designation the Project would include sidewalk bump-outs, preserve onstreet parking in certain locations, include streetscape landscaping, and modify travel lane widths. Further, the Project would also conform with the Mobility Plan 2035 and its recommended street standards. Therefore, the Project would be consistent with this policy.

As the Flexibility Option would increase commercial square footage and reduce the

	ty Plan 2035
Policy	Project Consistency
	residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project.
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 5 <sup>th</sup> Street and Seaton Street with sidewalk bump-outs, new and additional landscape features such as street trees and provide two landscaped paseos. The paseos would provide access to ground floor terraces, commercial uses, and amenities and, therefore, the Project would be consistent with this policy. 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 2.4: Provide a slow speed network of locally serving streets.	Consistent. 5 <sup>th</sup> Street and Seaton Street are both designated as Collector Streets that are slow moving and safe enough to connect neighborhoods through active transportation. The Project Site is further accessed by a slow speed network of locally serving streets via Alameda Street (designated Avenue I), 4 <sup>th</sup> Street (designated Avenue II), and 6 <sup>th</sup> Street (designated Avenue II). 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. Further, The Project is proposing to implement a modified street classification, the Living Streets initiative, which would include sidewalk bump-outs and narrower travel lane widths along E. 5 <sup>th</sup> Street and Seaton Street, which would assist in decreasing vehicle speed. Therefore, the Project would be consistent with this policy. 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.
<b>Policy 2.6:</b> Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	<b>Consistent.</b> The Project would not modify existing bicycle facilities. 5 <sup>th</sup> Street and Seaton Street are not designated in the City's bicycle

	ty Plan 2035
Policy	Project Consistency
	enhanced network. 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 and, therefore, the Project would be consistent with this policy. As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project.
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 1.2-miles to the south of the Project Site and the US-101 (Hollywood) Freeway located approximately 0.9-mile east of the Project Site. The location of the Project Site, in close proximity to E. 4 <sup>th</sup> Street and Alameda Street, allows for easy and direct access to the regional freeway system and, therefore, the Project would be consistent with this policy. 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.	
Policy 2.17: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of	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

	ty Plan 2035
Policy	Project Consistency
way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	improvements; installing street lights (if required); and undergrounding existing overhead powerlines. Further, The Project is proposing to implement a modified street classification, the Living Streets initiative, which would include sidewalk bump-outs and narrower travel lane widths along E. 5 <sup>th</sup> Street and Seaton Street, which would assist in decreasing vehicle speed. All dedications and improvements would be completed in compliance with Mobility Plan 2035 and, therefore, the Project would be consistent with this policy.  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 3: Access for All Angelenos	
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.	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 5 <sup>th</sup> Street and Seaton Street with new and additional landscape features such as street trees and provide two landscaped paseos. The paseos 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 and, therefore, the Project would be consistent with this policy. 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 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.	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 infill lot developed with vacant warehouse uses within an urbanized area. The Project would provide access to new jobs within a mature urban area within proximity to Metro buses service and other public

Mobility Plan 2035		
Policy	Project Consistency	
Policy 3.4 Provide all residents, workers, visitors with affordable, efficient, convenient, and attractive transit services.	transit and, therefore, the Project would be consistent with this policy. 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.  Consistent. The Project would promote this policy since the Project Site is located in an area well-served by public transit. The Project Site is	
	located near the intersections of Alameda Street and 4 <sup>th</sup> Street and Alameda Street and 6 <sup>th</sup> Street. 4 <sup>th</sup> and 6 <sup>th</sup> Streets are major transportation corridors that are served by multiple Metro, LADOT, and MBL bus lines. Local and rapid Metro bus lines also run in the Project vicinity on Central Avenue, Alameda Street, and Palmetto Street. LADOT provides a DASH Downtown A line, the nearest stop of which is located at E. 4 <sup>th</sup> Place and Hewitt Street, approximately 1,100 feet to the north of the Project Site. Additionally, the Little Tokyo/Arts District Metro Gold Line Light Rail Station is located approximately 0.6 mile to the north of the Project Site. Therefore, the Project would be consistent with this policy. 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 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.	Consistent. The Project would promote this policy as the Project Site is located near the intersection of Alameda Street and 7 <sup>th</sup> Street. 7 <sup>th</sup> Street is a major transportation corridor that is served by multiple Metro bus lines. Local and rapid Metro bus lines also run on E. 6 <sup>th</sup> 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 and, therefore, the Project would be consistent with this policy. 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	ty Plan 2035  Project Consistency	
	Consistent. The Project would provide bicycle	
Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	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 northeastern perimeter on the ground floor and long-term bicycle parking would be located within the first subterranean level of the parking garage. Therefore, the Project would be consistent with this policy.  As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project.	
<b>Policy 3.9:</b> Discourage the vacation of public rights-of-way.	Consistent. No vacation of public rights-of-way are required by the Project or on the streets adjacent to the Project Site and, therefore, the Project would be consistent with this policy. 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>Policy 3.10:</b> Discourage the use of cul-desacs that do not provide access for active transportation options.	Consistent. No cul-de-sacs are located in the vicinity of the Project Site and, therefore, the Project would be consistent with this policy. 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 4: Collaboration, Communication & informed Choices		
Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles		

Table IV.G-3
Project Consistency with the Applicable Policies of the Mobility Plan 2035

Mobility Plan 2035		
Policy	·	
Policy 4.15: Require a public hearing for	on Central Avenue, Alameda Street, and Palmetto Street. LADOT provides a DASH Downtown A line, the nearest stop of which is located at E. 4 <sup>th</sup> Place and Hewitt Street, approximately 1,100 feet to the north of the Project Site. Additionally, the Little Tokyo/Arts District Metro Gold Line Light Rail Station is located approximately 0.6 mile to the north of the Project Site. Therefore, the Project would be consistent with this policy.  As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation, including the same amount of vehicular parking spaces, would be comparable to the Project and would therefore be similarly consistent.  Consistent. The Project does not propose or	
the proposed removal of an existing Class II or Class IV bicycle facility.	require the removal of any Class II or Class IV bicycle facilities and, therefore, the Project would be consistent with this policy.  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 5: Clean Environments & Health		
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project supports reductions in VMT by providing housing within walking distance of a well-developed transit system, as well as within numerous neighborhood-serving 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 and, therefore, the Project would be consistent with this policy.  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.	

Table IV.G-3
Project Consistency with the Applicable Policies of the Mobility Plan 2035

	ty Plan 2035
Policy F.4: Continue to encourage the	Project Consistency  Consistent The Design is an "infill cite" leasted
Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	within a Transit Priority Area ("TPA") pursuant to Senate Bill 743, due to its proximity to a "major transit stop," as defined in Public Resources Code Section 21064.3, which is located at the intersections of E. 6 <sup>th</sup> Street and Alameda Street and E. 6 <sup>th</sup> Street and Central Avenue, both located approximately 0.5 mile from the Project Site. The Project's location near major transit facilities, including its TPA designation, 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. Also, the Project would provide electric charging stations and equipped for its expansion for electric vehicles within its parking structure. Therefore, the Project would be consistent with this policy. 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 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	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. Therefore, the Project would be consistent with this policy.  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.  September 7, 2017; EcoTierra Consulting, 2020.

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

Project Consistency with Applicable Policies of the Housing Element	
Policies	Project Consistency
Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.  Policy 2.2.5: Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.	Consistent. The Project would include up to 220 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 would set aside 11 percent of its units, or 25 units total, for deed-restricted for Very Low Income households.  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 and local bus transit systems.  The above analysis is equally applicable to the Flexibility Option, which would include 200 livework 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.  Consistent. The Project would not remove any existing residences. The proposed commercial land uses would provide amenities to the Project's future residents and visitors, as well as the existing neighborhood residents, workers, and visitors. Furthermore, the Project would provide a minimum of 22,725 square feet of open space for its 220 live/work dwelling units. Amenities would be in the form of a swimming pool and deck, outdoor areas for lounging, indoor amenities, such as fitness and recreational rooms, a resident art gallery, and plaza and pedestrian paseo areas and, therefore, the Project would be consistent with this policy. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project, including providing the same amount of common open space and private open space for 200 live/work units, and would therefore be
Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.	similarly consistent.  Consistent. The Project would meet the requirements in the City's Green Building Code and would include the conservation measures discussed in Section IV.G. Land Use, in Section (k) Los Angeles Green Building Code of this Draft

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

Policies	Project Consistency
Folicies	EIR. Therefore, the proposed building would
	minimize the adverse effects on the environment
	and 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 2016-2040 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.
Policy 2.3.2: Promote and facilitate	Consistent. As described in Section IV.M.1,
reduction of water consumption in new	Utility and Service Systems-Water, of this Draft
and existing housing.	EIR, through City mandated conservation
	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 of the
	estimated amount. Therefore, the Project would
	minimize water consumption in the proposed
	residences and commercial uses and would be
	consistent with this policy.
	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 2.3.3: Promote and facilitate	Consistent. The Project would meet the
reduction of energy consumption in new	requirements in the City's Green Building Code.
and existing housing.	The Project would have numerous green building
and oxioting nodoling.	design features, including a highly efficient HVAC
	system. Refer to <b>Section IV.N</b> , <b>Energy</b> , of this
	Draft EIR, for further discussion. Therefore, the
	Project would minimize energy consumption and
	would be consistent with this policy. The above
	analysis is equally applicable to the Flexibility
	Option as the design, configuration, and

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

Policies	Project Consistency
	operation would be comparable to the Project
	and would therefore be similarly consistent.
Policy 2.3.4: Promote and facilitate	Consistent. As discussed in Section IV.M.3,
reduction of waste in construction and	Utility and Service Systems – Solid Waste, of
building operations.	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 <b>Section IV.M.3</b> , <b>Utility</b>
	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 and would be consistent with this
	policy.
	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: Los Angeles Department of City Plan	nning, Housing Element 2013-2021, adopted December

Source: Los Angeles Department of City Planning, Housing Element 2013-2021, adopted December 3, 2013; EcoTierra Consulting, 2020.

Table IV.G-5
Consistency with Applicable Policies of the Healthy LA Plan

#### **Policies**

#### **Evaluation of Project Consistency**

#### Chapter 2 – A City Built for Health

Policy 2.2 Healthy Building Design Promote a and Construction: healthy built environment bγ 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 universal accessibility using existing tools practices, and programs.

**Consistent.** The Project would promote a healthy built environment by replacing vacant industrial warehouse uses 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 opportunities for wall art on the east and southfacing walls along the ground level. The Project's building frontage would provide a variety of commercial uses along E. 5<sup>th</sup> Street and Seaton In addition, the publicly accessible Street. pedestrian paseos would provide connectivity between the building's frontages. The Project includes common open space that would be comprised of a range of amenities including paseos, 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 illuminate building provided to entrances. driveways, commercial use, and for security purposes. In addition, the Project encourages active transportation by including 180 bicycleparking stalls, including 17 short term stalls for the on-site commercial uses and, therefore, the Project would be consistent with this policy.

As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation, including the same amount of vehicular parking spaces, would be comparable to the Project and would therefore be similarly consistent.

#### Chapter 5 – An Environment Where Life Thrives

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

**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,

Table IV.G-5
Consistency with Applicable Policies of the Healthy LA Plan

#### **Policies**

improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.

#### **Evaluation of Project Consistency**

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, waterconserving turf, high-efficiency residential and commercial clothes washers, water-saving pool filters, and leak detection systems for pools and iacuzzis, 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. Therefore, the Project would be consistent with this policy.

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, Plan for a Healthy Los Angeles, March 2015; EcoTierra Consulting, 2020.

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

Policies Project Consistency	
	Project Consistency
<b>Residential Objective 1-1:</b> To provide for the preservation of existing housing and for the development of new housing to meet	Consistent. The Project would include up to 220 live/work units in the dense urban community of the Arts District in downtown Los Angeles, in
the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.	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 would set aside 11 percent of its units, or 25 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 and as required by the building code, the Project's would be configured to be fully accessible per the ADA. Therefore, the Project would be consistent with this policy. The above analysis is equally applicable to the Flexibility Option, which would include 200 livework 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.
Policy 1-1.1: Designate specific lands to provide for adequate multi-family residence development.	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 adaptive live/work uses and intensities and, therefore, the Project would be consistent with this policy. The above analysis is equally applicable to the Flexibility Option, which would include 200 live/work units and approximately 64,313 square feet of commercial space, as the overall design, configuration, and operation would be

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

City North Community Plan		
Policies	Project Consistency	
	comparable to the Project and would therefore be similarly consistent.	
Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	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 Alameda Street and 6 <sup>th</sup> Street. In addition, the Project encourages active transportation by including 180 bicycle parking stalls. The Project also improves walkability in the immediate vicinity of the Project Site by replacing vacant warehouse uses and a surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options. The 220 live/work units will be able to access the ground floor commercial spaces and the other nearby commercial retail/restaurants. The Project's building frontage would provide a variety of ground floor commercial uses along 5 <sup>th</sup> Street and Seaton Street. Furthermore, the Project would provide opportunities for employees, residents, and visitors to walk to other retail businesses within and near the Project Site.  As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 179 bicycle parking stalls, compared to the Project's 180 bicycle parking stalls, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation, including the same amount of vehicular parking spaces, would be comparable to the Project and would therefore be similarly consistent.	
Commercial		
<b>Policy 2-1.4:</b> Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	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 Plan, which envisions the continued and expanded development of a thriving artists-in-residence community. Furthermore, the Project's height, bulk and	

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

City North Community Plan	
Policies	Project Consistency
	massing is consistent with other mid-rise structures in the area, such as, the 6-story Beacon Lofts and the approximately 5-story Barker Block Lofts. The Project would feature design characteristics (e.g., breaks and setbacks in the building articulation) that break up massing and there would also be opportunities for wall art on the east- and south-facing walls along the ground level. Therefore, the Project would be consistent with this policy. 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 2-2.2: New development needs to add to and enhance the existing pedestrian street activity.	Consistent. The Project has been designed to create a pedestrian-oriented streetscape along E. 5 <sup>th</sup> Street and Seaton Street with sidewalk bump-outs, new and additional street trees and landscaping and sidewalk paving elements. The commercial uses would consist of several establishments, each with its own entrance directly from the street or from one of the two landscaped paseos. The paseos would provide access to ground floor terraces, commercial uses, and amenities and, therefore, the Project would be consistent with this policy. 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 2-2.3: Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.	Consistent. The Project's commercial uses would be located on the ground level fronting E. 5 <sup>th</sup> Street and Seaton Street. The commercial uses would include general commercial, restaurant, retail, office and art production-related uses and, therefore, the Project would be consistent with this policy. 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.

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

	Community Plan
Policies	Project Consistency
Policy 2-3.1: New development needs to add to and enhance the existing pedestrian activity.	Consistent. The Project has been designed to create a pedestrian-oriented streetscape. The commercial uses would consist of several establishments, each with its own entrance directly from the street or from one of the two landscaped paseos. The paseo from Seaton Street would be located mid-Project and provide a 30-foot by 30-foot pedestrian entry into the internal courtyard. The paseo from E. 5 <sup>th</sup> Street would provide a 22-foot wide breezeway for approximately 100 feet that also meets at the internal courtyard. The paseos would enhance the overall pedestrian activity in the area and, therefore, the Project would be consistent with this policy.
Policy 2-3.2: New development in pedestrian oriented areas shall provide	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.  Consistent. Vehicular access to the Project Site would be provided via a new driveway entrance
parking at the rear of the property.	off of Seaton Street and would be located in three subterranean levels and, therefore, the Project would be consistent with this policy.  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 2-3.3: Identify pedestrian oriented areas as preferred locations for mixed use projects.	Consistent. The Project would be 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 6-story Beacon Lofts, located approximately 730 feet to the north of the Project Site, and the approximately 5-story Barker Block Lofts located approximately 565 feet to the east of the Project Site. Therefore, the Project would be consistent with this policy. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

	Community Plan
Policies	Project Consistency
	Project and would therefore be similarly consistent.
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.	Consistent. The Project's commercial uses would be located on the ground level fronting E. 5 <sup>th</sup> Street and Seaton Street. The commercial uses would include general commercial, restaurant, retail, office and art production-related uses and, therefore, the Project would be consistent with this policy. 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 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.	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 Plan area. The Project is seeking a General Plan Amendment, which would change the current land use designation from Heavy Industrial to Regional Center Commercial, and permit the mix of commercial and live/work uses being proposed. The Project would include development of 220 live-work units over ground-floor commercial uses, including art 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 200 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	,
Policy 8-1 1: Consult with the Police	Consistent As discussed in Section IV.J.2

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. Therefore, the Project would be consistent with this policy. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

	Community Plan
Policies	Project Consistency
	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 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 limiting visual obstruction and infrequently accessed "dead zones". Therefore, the Project would be consistent with this policy. 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 and, therefore, the Project would be consistent with this policy.  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)
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.	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. Therefore, the Project would be consistent with this policy. 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.
Transportation	
<b>Policy 14-1.1:</b> Consolidate parking, where appropriate, to eliminate the	Consistent. Vehicle access into the shared parking garage for the commercial and live/work

Table IV.G-6
Project Consistency with Applicable Objectives and Policies of the Central
City North Community Plan

	Community Plan
Policies	Project Consistency
number of ingress and egress points onto the arterial.	uses would be available only from Seaton Street to the three subterranean levels of the parking garage. Thereby, reducing the amount of existing access points, which are currently from Seaton Street and 5 <sup>th</sup> Street, from two to one and, therefore, the Project would be consistent with this policy. 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 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".	Consistent. As discussed in Section IV.K, Transportation, of this Draft EIR, the Existing With Project scenario indicates that the Project (based on current VMT requirements) is not expected to create significant daily VMT impacts. Incremental, but not significant, impacts are noted at the study intersections. Furthermore, based on the project-related VMT analysis (i.e., which concludes that the Project falls under the City's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of 2016-2040 RTP/SCS), no cumulative VMT impacts are anticipated and, therefore, the Project would be consistent with this policy. 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.
Historic and Cultural Resources	
	Consistent: The Project includes development of 220 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. Therefore, the Project would be consistent with this policy.

### Table IV.G-6 Project Consistency with Applicable Objectives and Policies of the Central City North Community Plan

Policies	Project Consistency
	The above analysis is equally applicable to the Flexibility Option, which would include 200 live/work units, as the overall design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.
Source: City of Los Angeles, Central City Nor Consulting, 2020.	th Community Plan, December 15, 2000; EcoTierra

Table IV.G-7
Consistency with Applicable Design Policies of the Central City North
Community Plan

	Policies Project Consistency	
Α.	Commercial 1. Site Planning	,
	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 Seaton 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 Seaton 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 E. 5 <sup>th</sup> Street and Seaton Street, and some commercial uses would be located on the second floor. Two paseos that would be accessible to the public and would provide access to ground-floor commercial uses and an outdoor lounge on the second level. The commercial uses would include general commercial, restaurant, retail, office and art production-related uses.

Table IV.G-7
Consistency with Applicable Design Policies of the Central City North
Community Plan

	Community Plan	
	Policies	Project Consistency
d.	Providing front pedestrian entrances for businesses fronting on main commercial streets.	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.  Consistent. Pedestrian access into the Project would be provided via both E. 5 <sup>th</sup> Street and Seaton 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.
	Commercial 2. Commercial (Height	and Building Design)
	Providing accenting, complimentary building materials to building façades.	Consistent. Throughout the Project, there would be a variety of textures, materials, signage, and architectural features appropriate for each function. The articulation of each of the Project's street façades would incorporate a combination of shaped windows and solid walls to create a patterned façade that resembles a flower oriented toward E. 5th Street at the northeastern corner of the Project Site. The north- and west-facing street façades would incorporate scaled windows and partially enclosed balconies at select locations. The design of the balconies would provide a texture to the façade which would complement with neighboring buildings. The Project would adopt the classic metal and plaster materials typical of buildings within the Arts District.  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 the applications of architectural features or articulations to building façades.	Consistent. Throughout the Project, there would be a variety of textures, materials, signage, and architectural features. The articulation of each of the Project's street façades would incorporate a combination of shaped windows and solid walls to create a patterned façade that resembles a flower oriented toward E. 5 <sup>th</sup> Street at the northeastern corner of the Project Site. There would be additional opportunities for wall art on the east and south walls. The north- and west-

Table IV.G-7
Consistency with Applicable Design Policies of the Central City North
Community Plan

		munity Plan
	Policies	Project Consistency
		facing street façades would incorporate scaled windows and partially enclosed balconies at select locations. The design of the balconies would provide a texture to the façade which would complement with neighboring buildings. Overall, the design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive facades. Furthermore, the Project's building frontage would provide a variety of commercial uses on along E. 5 <sup>th</sup> Street and Seaton 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.
	esignating architecturally untreated çades for signage.	Consistent. The signage for the Project would comply with the sign standards set forth in the LAMC (various sections in LAMC 12.21.A.4). 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.
	creening of mechanical and ectrical 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.
ard	equiring the enclosure of trash eas 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.
	ommercial 5. Commercial (Light a	
ре	stalling on-site lighting along all edestrian walkways and vehicular ecess 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

Table IV.G-7
Consistency with Applicable Design Policies of the Central City North
Community Plan

Community Plan		
Policies	Project Consistency	
	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. New Project signage would be used for building identification, tenant identification, wayfinding, and security markings. 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 )	,	
Maximize commercial uses on the ground floor by requiring 10% of commercial development to serve needs of the residential portion of the building.	Consistent. The Project includes development of live-work units over ground-floor general commercial, restaurant, retail, office and art 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		
Requiring usable open space for outdoor activities, especially for children.	Consistent. The Project would include approximately 22,725 square feet of useable open space, of which approximately 18,719 square feet would be outdoor common space. The common open space available to the live/work residents would be comprised of a range of amenities including a swimming pool and deck, outdoor areas for lounging, indoor	

## Table IV.G-7 Consistency with Applicable Design Policies of the Central City North Community Plan

Community Flan	
Policies	Project Consistency
Source: City of Los Angeles, Central City North Community Plan, December 15, 2000; EcoTierra	
Consulting, 2020.	, , , , , , , , , , , , , , , , , , , ,

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

	il Redevelopment Plan
Goals	Project Consistency
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.	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 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.
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.	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 limiting visual obstruction and infrequently accessed "dead zones", which would reduce the potential for graffiti to occur.  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.
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.	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. Some of the Project's key design features that contribute to energy efficiency include the installation of energy

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

	ii Keuevelopillelit Flali
Goals	Project Consistency
Objective 11.4: Encourage waste - resource matching and recycling.	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 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.  Consistent. 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.
Course Otto of Los Association Designation	of Diana fam Cambral Indicatrial Dadaccalamnant Dusiant

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

	ns of the Citywide Design Guidelines
Objective	Project Consistency
Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.	The evaluation of the Project's consistency with sub-categories under this guideline is provided below.
Site Planning Provide direct access to the surrounding neighborhood and amenities, including transit.	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 and Central Avenue.  The ground-floor commercial uses would consist of several establishments, each with its own entrance directly from the street, pedestrian plaza, or paseo. Pedestrian access to the commercial spaces on the second level would be accessible via stairs and elevators in the Project's commercial lobby in the paseo at Seaton Street. Pedestrian access to the live/work component would also be accessible from 5th Street and Seaton Street, with 5th Street providing access to the primary 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
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.	therefore be similarly consistent.  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.

Consistency with Applicable Provision	
Objective	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.
Building Design	<b>Consistent.</b> The Project would not include
Promote pedestrian activity by placing	any below street level pedestrian entries.
entrances at grade level or slightly above, and	Pedestrian access to the Project's various
unobstructed from view from the public right-	components would be provided from 5 <sup>th</sup>
of-way. Entryways below street level should	Street and Seaton Street. The ground-floor
be avoided.	commercial uses would consist of several
	establishments, each with its own entrance
	directly from the street, pedestrian plaza, or
	paseo. Pedestrian access to the commercial
	spaces on the second level would be
	accessible via stairs and elevators in the
	Project's commercial lobby in the paseo at
	Seaton Street. Pedestrian access to the
	live/work component would also be
	accessible from 5 <sup>th</sup> Street and Seaton Street,
	with 5 <sup>th</sup> Street providing access to the primary
	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.
Prioritize the use of stairs by locating near the	<b>Consistent.</b> Pedestrian access to the
building's entrance and directly on the primary	Project's various components would be
paths of travel.	provided from 5 <sup>th</sup> Street and Season Street.
	Pedestrian access to the commercial spaces
	on the second level would be accessible via
	stairs and elevators in the Project's
	commercial lobby in the paseo at Seaton
	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.
Guideline 2: Carefully incorporate	The evaluation of the Project's consistency
vehicular access such that it does not	with the subtopic under this guideline is
discourage and/or inhibit the pedestrian	provided below.
experience.	
Site Planning	Consistent. Pedestrian access to the
Prioritize pedestrian access first and	Project's various components would be
automobile access second. Orient parking and	provided from 5 <sup>th</sup> Street and Seaton Street via
driveways toward the rear or side of buildings	paseos into the Project and building

Objective	Project Consistency
and away from the public right-of-way. On	entrances oriented along these streets.
corner lots, parking should be oriented as far from the corner as possible.	Pedestrian access to the live/work component would also be accessible from 5 <sup>th</sup>
	Street and Seaton Street, with 5 <sup>th</sup> Street providing access to the primary live/work lobby. Vehicle access into the shared parking
	garage for the commercial and live/work uses would be available from Seaton 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	Consistent. The existing curb cut along 5 <sup>th</sup>
entrances and overall driveway widths.	Street would be removed. Vehicle access into the shared parking garage for the
	commercial and live/work uses would be available from Seaton 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.
Do not locate drop-off/pick-up areas between	Consistent. Vehicles would enter the Project
principal building entrances and the adjoining sidewalks.	from Seaton 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.	<b>Consistent</b> . Vehicle access into the shared parking garage for the commercial and
intersections as possible.	residential uses would be available via Seaton 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
Ensure that leading areas do not interfere with	therefore be similarly consistent.  Consistent. Delivery vehicles would enter
Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by	the Project from Seaton Street, where there
separating loading areas and larger	would be a designated loading area within the

	Project Consistency
Objective	· · ·
commercial vehicles from areas that are used for public parking and public entrances.	ground floor of the building. Pedestrian access to the Project's various components would be provided from 5 <sup>th</sup> Street and Seaton Street via paseos into the Project and building entrances oriented along these streets. Pedestrian access to the live/work component would also be accessible from 5 <sup>th</sup> Street and Seaton Street, with 5 <sup>th</sup> Street providing access to the primary 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.
Guideline 3: Design projects to actively	The evaluation of the Project's consistency
engage with streets and public space and	with the subtopic under this guideline is
maintain human scale.	provided below.
Building Design	<b>Consistent.</b> The Project promotes an
Locate active ground floor uses along primary	enhanced pedestrian-oriented design with
street frontages.	ground floor retail uses along 5 <sup>th</sup> Street and Seaton Street, outdoor dining facilities, open space and recreation facilities for tenants, guess 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.
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.	Consistent. The Project would provide approximately 22,725 square feet of on-site open space. The Project's various amenities would include a swimming pool and deck, outdoor areas for lounging, indoor amenities, such as fitness and recreational rooms, a resident art gallery, and plaza and pedestrian paseo areas. In addition, a number of live/work units would include private balconies. The Project would provide two landscaped pedestrian paseos. The paseo from Seaton Street would be located mid-Project and provide a 30-foot by 30-foot pedestrian entry into the internal courtyard. The paseo from E. 5 <sup>th</sup> Street would provide a 22-foot wide breezeway for approximately 100 feet that also meets at the internal courtyard. The above analysis is equally applicable to the Flexibility Option as the

	ns of the Citywide Design Guidelines
Objective	Project Consistency
	design, configuration, and operation would be comparable to the Project, including the same amount of common open space, and would therefore be similarly consistent.
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.	Consistent. The Project would provide short- and long-term bicycle spaces as required by the City Bicycle Ordinance. 17 short-term bicycle parking spaces for the commercial uses and 14 short-term spaces for the live/work uses would be located near the eastern perimeter on the ground floor within the paseo off E. 5 <sup>th</sup> Street, thereby providing direct access to bicycle parking. As the Flexibility Option would increase commercial square footage and reduce the residential unit count, a total of 17 short-term bicycle parking spaces for the commercial uses and 13 short-term spaces, would be provided under this option. Nonetheless, the above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project.
Guideline 4: Organize and shape projects to recognize and respect surrounding context.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Site Planning Lay out the site to ensure that access and building entrances are clearly legible.	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.
Building Design Modulate building massing vertically and horizontally to a scale compatible to its context.	Consistent. The massing of the Project would be articulated with a variety of breaks along the 5 <sup>th</sup> Street and Seaton Street frontage, which would also provide visual interest. The design of the building incorporates differing color palette 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

	ns of the Citywide Design Guidelines
Objective	Project Consistency
	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.
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.	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.
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.
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.	Consistent. A total of 16 new street trees, along with low-growing vegetation would be incorporated into the landscape plan. The street trees would be comprised of Mesa Oak and Catalina Cherry and would provide shade along the perimeter of 5 <sup>th</sup> Street and Seaton Street. The south façades are adjacent to existing uses and will have minimal direct sunlight. No trees will be planted along the south 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.
Install a publicly accessible Electric Vehicle charging station and/or space for car-share	<b>Consistent.</b> the Project would provide 30 percent of its required parking spaces to be electric-vehicle ready, and ten percent of its

Objective	Project Consistency
providers on the project site, if the site and	required parking spaces would be provided
context is suitable.	chargers for electric vehicles within the
Context is suitable.	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
Late made and an account of Euletin at a financial	therefore be similarly consistent.
Integrate solar powered lighting to increase	Consistent. The Project would be compliant
energy efficiency.	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.
Guideline 10: Enhance green features to	The evaluation of the Project's consistency
increase opportunities to capture	with the subtopic under this guideline is
stormwater and promote habitat.	provided below.
Site Planning	Consistent. In accordance with National
Facilitate stormwater capture, retention, and	Pollutant Discharge Elimination System
infiltration, and prevent runoff by using	Municipal Permit requirements, the Project
permeable or porous paving materials in lieu	would be required to implement Standard
of concrete or asphalt. Collect, store, and	Urban Stormwater Mitigation Plan and Low
reuse stormwater for landscape irrigation.	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 would be
	comparable to the Project and would
	therefore be similarly consistent.
	meretore be similarly consistent.

Consistency with Applicable 1 Tovision	his of the only wide Besign Galacinies
Objective	Project Consistency
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.
Source: Citywide Design Guidelines, adopted Octob	ber 24, 2019; EcoTierra Consulting, 2020.