

IV. Environmental Impact Analysis

H. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impacts related to the remaining topic covered under land use and planning regarding whether the Project would physically divide an established community was fully evaluated in the Initial Study prepared for the Project, which is included in Appendix A of this Recirculated Draft EIR. In addition, analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Recirculated Draft EIR, including Section IV.A, Aesthetics, which evaluates Project consistency with the Urban Design Chapter of the General Plan Framework Element and Section IV.B, Air Quality, which evaluates Project consistency with the South Coast Air Quality Management Plan.

2. Environmental Setting

a. Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302;
- Senate Bill 375;
- California Coastal Act of 1976;
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles General Plan;
- Palms–Mar Vista–Del Rey Community Plan;
- Los Angeles Municipal Code;

- Citywide Design Guidelines; and
- City of Los Angeles Coastal Transportation Corridor Specific Plan.

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32's greenhouse gas (GHG) emission reduction goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of GHG emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(c) California Coastal Act of 1976

The California Coastal Act of 1976 was enacted as a comprehensive scheme to govern land use planning for the entire coastal zone in the State in a manner that protects the state's natural and scenic resources, protects the ecological balance of the coastal zone, and ensures that existing and future development is consistent with the policies of Coastal Act. Under the Coastal Act, any development in the coastal zone must obtain a coastal development permit. Chapter 3 of the Coastal Act constitutes the standards for the

permissibility of proposed developments subject to the Coastal Act. These policies are listed in Public Resources Code Section 30200 through Section 30265.5.

(2) Regional

(a) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, and the provision of services by other regional agencies. SCAG’s overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, the 2020–2045 RTP/SCS’ “Core Vision” centers on maintaining and better managing the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans “Key Connections” augment the “Core Vision” to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals and include, but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020–2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions’ overall quality of life. These benefits include, but are not limited to, a 5-percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)¹ by 6 percent and the share of new job growth in HQTAs by 15 percent.

The Project’s consistency with the applicable goals of the 2020–2045 RTP/SCS for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below. A detailed list of the goals of the 2020–2045 RTP/SCS applicable to the

¹ HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

Project is included in Table 1 of Appendix G of this Recirculated Draft EIR, along with a discussion of whether the Project conflicts with that particular goal.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),² originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,³ including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

Land Use Chapter

The Framework Element's Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential

² *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed June 8, 2023.*

³ *The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).*

neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to, reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.⁴

Housing Chapter

The overarching goal of the Framework Element's Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter recognizes that the distribution of housing in proximity to transit can reduce vehicle trips and provide residents with the opportunity to walk between their home, job, and/or neighborhood services. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

- Concentrating opportunities for new development in the City's Neighborhood Districts and in Community Centers, Regional Centers, and the Downtown Center, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards located near existing or planned major transit facilities and areas characterized by low-intensity or marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and
- Focusing mixed uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings and, second, to enhance the physical character of neighborhoods and

⁴ *General Plan Framework Element, Figure 3-3, Long Range Land Use Diagram—West/Coastal Los Angeles.*

communities within the City.⁵ The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

Economic Development Chapter

The Framework Element's Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The Economic Development Chapter also establishes mutual development objectives for land use and economic development. The Economic Development Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Economic Development Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development, which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

⁵ *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

Transportation Chapter

The Framework Element's Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other chapters of the Framework Element regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

Infrastructure and Public Services Chapter

The Framework Element's Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development, as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project is included in Table 2 of Appendix G of this Recirculated Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

(ii) Mobility Plan 2035

Mobility Plan 2035 (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles

and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

The Project's consistency with applicable goals, objectives, and policies in the Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Mobility Plan applicable to the Project is included in Table 2 of Appendix G of this Recirculated Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The 2021–2029 Housing Element, which was adopted on November 24, 2021, identifies the City’s housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City’s housing and growth strategy; and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels;
- Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- Goal 5: A City that is committed to preventing and ending homelessness.

The Project’s consistency with the applicable policies set forth in the Housing Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the objectives and policies of the Housing Element applicable to the Project Site for Option A is included in Table 3 of Appendix G of this Recirculated Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular objective or policy.

(v) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City’s General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City’s future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues, such as transportation, housing, environmental justice, and open space, among others. The plan includes

Chapter 5, An Environment Where Life Thrives, which identifies the following environmental policies:

- Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
- Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.
- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

Included in this General Plan Element are policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State, regional, and local policies that call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(vi) Palms–Mar Vista–Del Rey Community Plan

The City's Palms–Mar Vista–Del Rey Community Plan (Community Plan), which covers the Palms–Mar Vista–Del Rey area is the land use element of the General Plan applicable to the Project Site area. The Community Plan implements the General Plan Framework and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. Adopted on November 20, 1985 and updated in 1997, the specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Palms–Mar Vista–Del Rey community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible. The Palms–Mar Vista–Del Rey Community Plan is one of

the four Westside community plans being updated with the City of Los Angeles Department of City Planning.

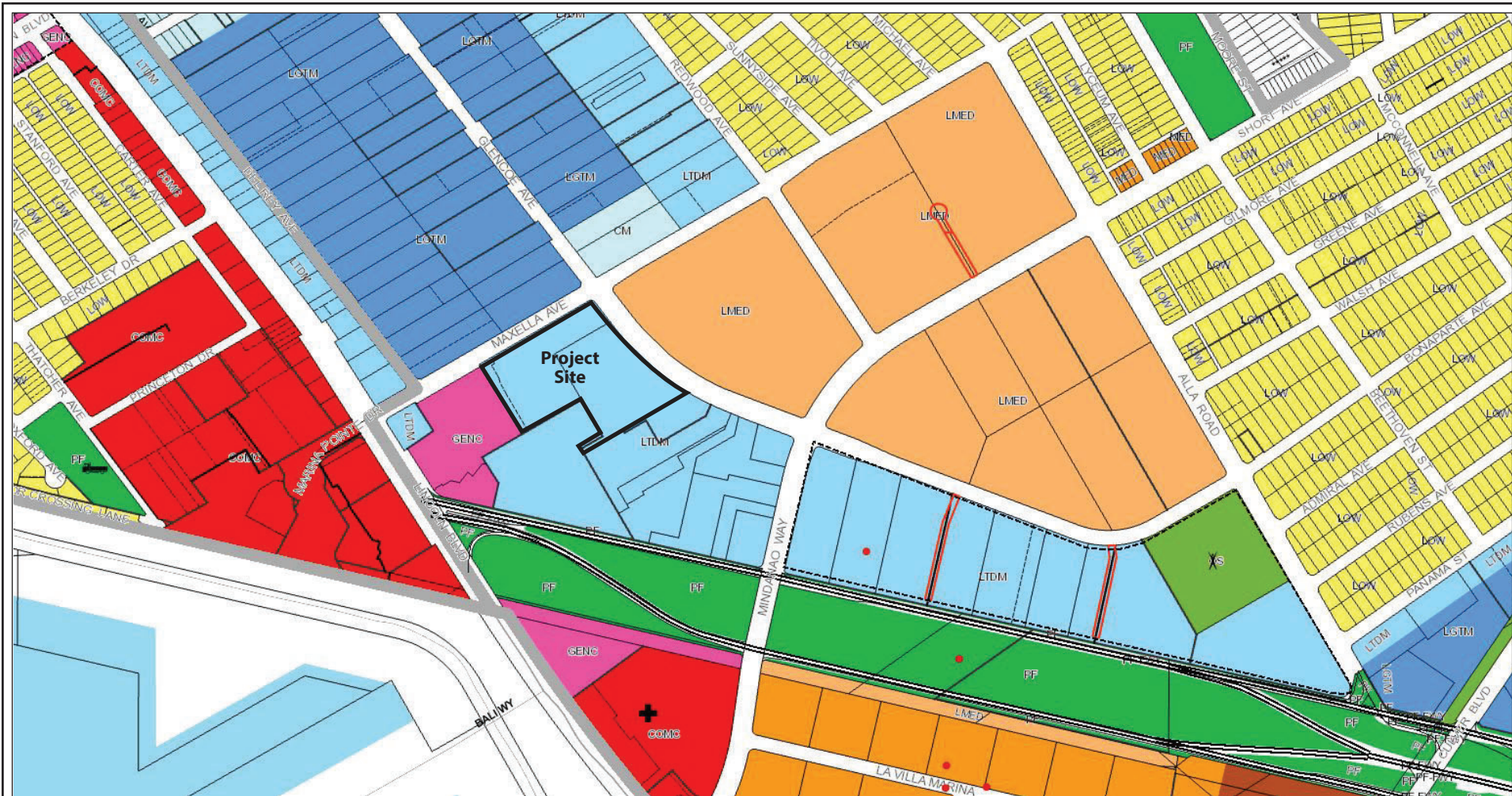
As shown in Figure IV.H-1 on page IV.H-12, the Community Plan's land use designation for the Project Site is Limited Manufacturing. The Project's consistency with applicable goals, objectives, and policies in the Community Plan adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below. A detailed list of the goals, objectives and policies of the Community Plan applicable to the Project is included in Table 4 of Appendix G of this Recirculated Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

(b) Los Angeles Municipal Code

All development activity on the Project Site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. As shown in Figure IV.H-2 on page IV.H-13, the Project Site is zoned as [Q]M1-1 (Qualified Limited Industrial, Height District 1). The Limited Industrial zone permits a wide array of land uses. Specifically, the M1 Zone permits any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. Height District 1 within the M1 Zone normally imposes no height limitation and has a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 Zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. The Q conditions also establish recycling and graffiti removal requirements for the Project Site. The Project's consistency with the LAMC is discussed below.

(c) City of Los Angeles Coastal Transportation Corridor Specific Plan

The City adopted the Coastal Transportation Corridor Specific Plan to establish a transportation mitigation program for all lots located in whole or in part within the Specific Plan Area. The regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of Chapter 1 of the LAMC, as amended, and any other relevant ordinances, and do not convey any rights not otherwise granted under the provisions and procedures contained in the LAMC and other relevant ordinances.



GENERAL PLAN LAND USE

COMMERCIAL

- General Commercial
- Community Commercial

RESIDENTIAL

- Low / Low I Residential
- Low Medium / Low Medium I Residential
- Medium Residential

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public Facilities

Project Site

Figure IV.H-1

Land Use Designations on the Project Site

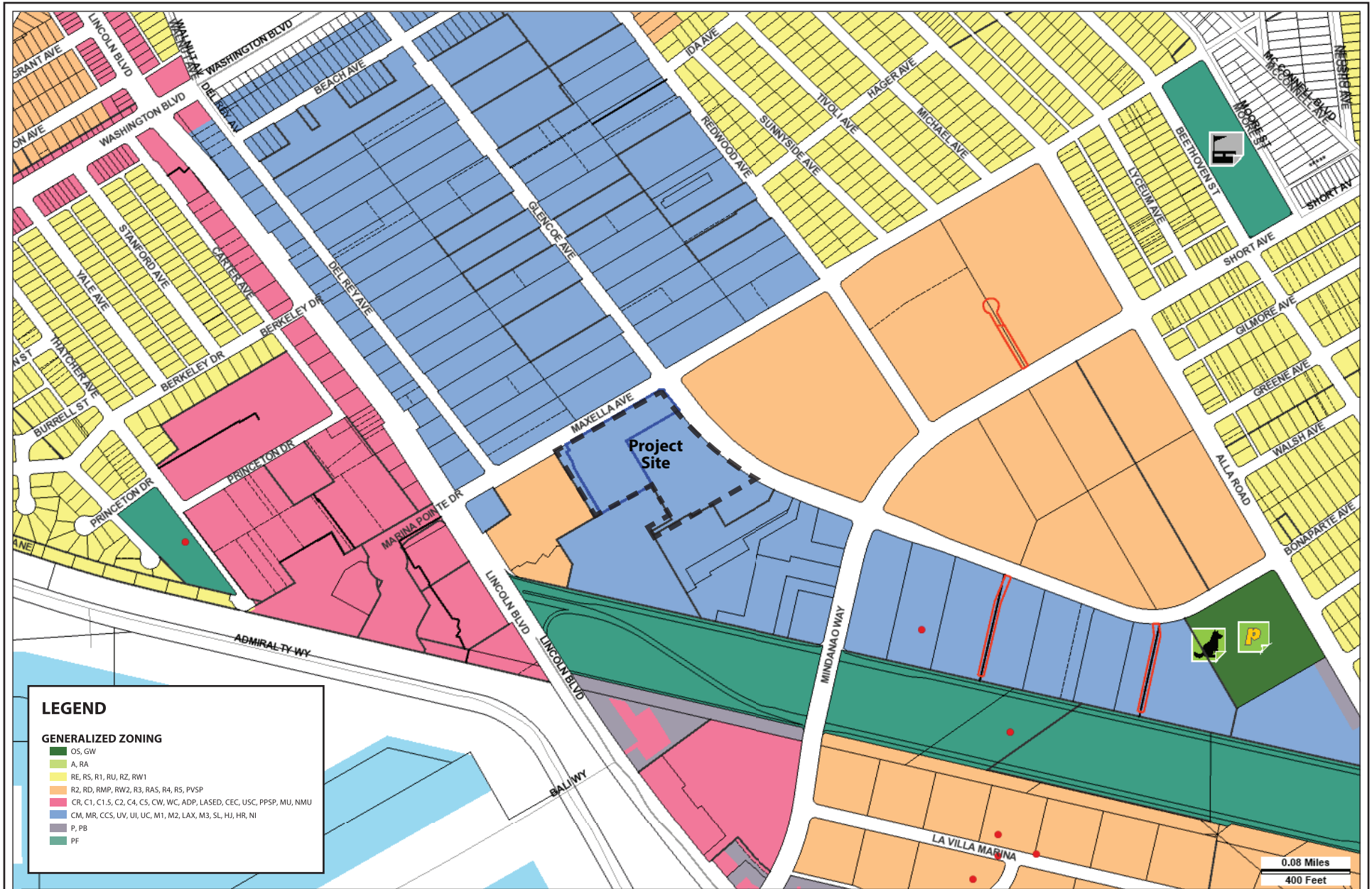


Figure IV.H-2
Zoning Designations on the Project Site

Provisions within the Specific Plan supersede the applicable regulations of the LAMC unless overridden by the LAMC or another adopted ordinance. The Specific Plan is intended to adopt a transportation impact mitigation program in the plan area that achieves the following purposes:

- Implement City and state policies concerning transportation, including the City of Los Angeles' General Plan Framework Element and Mobility Plan 2035, and state legislation (including SB 375, SB 743, and AB 1358) that reprioritize transportation improvements to focus on access to transit and active transportation as strategies to reduce dependence on vehicular travel, and reduce vehicle miles traveled (VMT) and associated greenhouse gas emissions;
- Improve mobility options within the plan area by providing transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, vehicle), primarily within existing available right-of-way, as part of a transportation system that is consistent with the City's General Plan Elements (Community Plans and Mobility Plan 2035);
- Produce fewer auto trips per capita and decrease VMT per capita by increasing multimodal transportation options and promoting best practices in Transportation Demand Management (TDM);
- Enhance mobility and connectivity along key transportation corridors, particularly by planning for dedicated transit lines that serve north-south corridors, including Lincoln and Sepulveda Boulevards, and provide connections to planned east-west transit lines;
- Enhance the transportation system by planning for better regional transit connectivity and "first mile–last mile" solutions such as better pedestrian conditions, bike share, improved bicycle facilities, and circulator bus service;
- Encourage walking and bicycling as a means to safely and conveniently access transit and circulate within and between neighborhoods;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Mitigate the transportation impacts resulting from new development within the plan area by providing a mechanism to fund and implement specific transportation improvements;
- Establish the Transportation Impact Assessment Fee in compliance with the Mitigation Fee Act for new development within the plan area;
- Ensure that costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts;

- Ensure that contributors to this Specific Plan’s fund benefit from the public transportation, bicycle, and pedestrian improvements constructed using Transportation Impact Assessment Fee funds;
- Promote neighborhood protection programs, where feasible, when implementing multimodal improvements, in order to minimize intrusion of commuter traffic through residential neighborhoods by the implementation of non-restrictive traffic calming measures;
- Reduce Trips by supporting the development of affordable housing at or near job sites and near transit, consistent with City policies;
- Establish Transportation Impact Assessment Fees that do not hinder the development of housing for diverse income levels in the Westside, including affordable housing for moderate, low, and very low income levels; and
- Ensure that development projects that are implemented in a phased manner include appropriate mitigations for each individual development phase.

The Project’s consistency with the Specific Plan is discussed below.

(d) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element’s urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines “carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions” and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines, such as those found in Community Design Overlays.

(e) Other City of Los Angeles Environmental Policies, Ordinances, and Plans

The City of Los Angeles has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (Chapter IX, Article 9, of the

LAMC), Los Angeles Fire Department Strategic Plan, Los Angeles Public Library Strategic Plan 2015–2020, Public Recreation Plan, 2010 Bicycle Plan, Los Angeles Department of Water and Power Urban Water Management Plan, Sustainable City pLAn, Green LA (the City’s climate action plan), and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Recirculated Draft EIR.

b. Existing Conditions

(1) Project Site

The Project Site is currently occupied by three structures, including a two-story Barnes & Noble bookstore located along the northeast corner of the Project Site, near the Maxella Avenue and Glencoe Avenue intersection; a single-story building providing a variety of retail uses located generally within the southern portion of the Project Site, along Glencoe Avenue; a two-story commercial and retail building located generally within the western portion of the Project Site; and surface parking and circulation areas. The existing surface parking areas within the Project Site include a total of 418 parking spaces. Vehicular access to the Project Site is currently available via driveways on Maxella Avenue and Glencoe Avenue. Pedestrian access is available from the vehicular access points and from other areas along Maxella Avenue and Glencoe Avenue.

Landscaping within the Project Site includes ornamental landscaping and hardscape features. Street trees and trees within the Project Site consist of various non-native species, including palm, pine, fig, gum, fern, cajeput, carrotwood, schefflera, strawberry, and olive trees that are not subject to the City’s Protected Tree Regulations.⁶

As shown in Figure IV.H-2 on page IV.H-13, the entire Project Site is zoned as [Q]M1-1 (Qualified Limited Industrial, Height District 1).

(2) Surrounding Uses

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Recirculated Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family

⁶ *The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to land use if it would:

Threshold (a): Physically divide an established community; or

Threshold (b): Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

As previously discussed, the Initial Study prepared for the Project, and included as Appendix A of this Recirculated Draft EIR, determined that the Project would result in a less than significant impact related to the Project's potential to physically divide an established community (Threshold (a)). For the remaining threshold (Threshold (b)), the analysis utilizes factors and considerations identified in the City's *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering Appendix G Threshold question (b). The *L.A. CEQA Thresholds Guide* identifies the following criteria related to land use consistency:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were

adopted to mitigate or avoid an environmental effect. State CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by CEQA Guidelines Section 15382. Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

... [I]f a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.

Analysis of conflicts and consistency with applicable plans is included in this section of the Recirculated Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. As discussed in the Office of Planning and Research (OPR), State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Generally, given that land use plans reflect a range of competing interests, a project should be consistent with a plan’s overall goals and objectives but need not be in perfect conformity with every plan policy.

c. Project Design Features

No specific project design features beyond the project improvements discussed in Section II, Project Description, of this Recirculated Draft EIR, are proposed with regard to land use and planning.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options – Option A and Option B.

Option A proposes the development of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of restaurant space. The multi-family residential and commercial uses proposed under Option A would be provided

within three seven-story buildings with a maximum height of 77 feet. The proposed uses would be supported by 1,217 vehicle parking spaces located in two subterranean parking levels and two above-grade parking levels located within each of the three buildings. Option A would provide up to approximately 70,175 square feet of open space and recreational amenities, including paved plazas with seating, landscaped paseos, and landscaped open space at the ground level that would be privately maintained and publicly accessible. Overall, Option A would remove approximately 100,781 square feet of existing commercial floor area and construct up to 674,329 square feet of new residential and commercial floor area, resulting in a net increase of up to 573,548 square feet of net new floor area within the Project Site for a maximum total floor area ratio (FAR) of 2.6 to 1.

Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,00 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of restaurant space and approximately 20,000 square feet of retail space. The proposed uses would be provided within four buildings. The proposed multi-family residential uses would be located within two six-story buildings with a height of up to 69 feet and one seven-story building with a height of up to 79 feet. The office uses would be provided within a four-story building (three stories of office space above one level of ground floor commercial space) with a height of up to 69 feet. The proposed commercial uses would be provided at the ground floor of two of the three residential buildings and the proposed office building. The proposed uses would be supported by 1,287 parking spaces that would be distributed throughout the Project Site in three subterranean levels, one above grade parking level, and a small surface parking area. Option B would provide up to approximately 109,745 square feet of open space and recreational amenities, including a large publicly accessible open space area along Glencoe Avenue, paved plazas with seating, courtyards, rooftop decks, and private balconies. Overall, Option B would remove approximately 100,781 square feet of existing floor area and construct 558,994 square feet of new floor area, resulting in a net increase of 458,213 square feet of net new floor area within the Project Site for a maximum total FAR of 2.15 to 1.

As described above, the total floor area, building heights, massing, and footprint would differ between the two development options. Where these differences could alter potential land use and planning impacts associated with each option, the options are considered separately. As such, the analysis provided below accounts for both development options and, generally, the term “Project” is used unless stated otherwise.

Threshold (a): Would the Project physically divide an established community?

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Recirculated Draft EIR, and summarized in Section VI, Other CEQA Considerations, of this Recirculated Draft EIR, the Project is a mixed-use development that would provide new

residential and commercial uses that would be compatible with and would complement existing and future development within the Project area. The Project would represent an extension and reflection of the existing surrounding urban environment.

While the Project (under both Option A and Option B) would increase the density, scale, and height of development on the Project Site, these changes would not be out of character with the surrounding area, which is an urbanized neighborhood that is characterized by a varied mix of land uses at various scales of development. The Project Site is specifically located in an area that is characterized by low-, mid-, and high-rise buildings occupied by commercial, office, and multi-family uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. The proposed mixed-use buildings would be compatible with existing mid-rise buildings in the vicinity of the Project Site, including the six-story multi-family Stella apartment complex located immediately to the west, the five-story Hotel MdR located southwest of the Project Site, the four-story apartment complex located northeast of the Project Site, and the two-story Marina Marketplace with three-story parking structure located north of the Project Site. Therefore, the Project's proposed residential and commercial uses would be consistent with and compatible with the scale of the existing uses surrounding the Project Site.

The Project would not create any division of land or divide an established community. The Project would improve and enhance the existing streetscape surrounding the Project Site to promote pedestrian activity in the vicinity of the Project Site. Specifically, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. This open space area includes a one-story amenity building and additional seating located along the southwestern portion of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. Option B would also include a large landscaped publicly accessible open space area along Glencoe Avenue. This open space area would include seating areas and a water feature. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.

Based on the analysis above, and as concluded in the Initial Study, the Project would not physically divide an established community, and impacts would be less than significant.

Threshold (b): Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) Consistency with the California Coastal Act of 1976

The Project includes the development of multi-family residential units, neighborhood-serving commercial (retail/restaurant) uses, open space, and office space (under Option B only) within an urbanized area. The Project would further the policies listed in Public Resources Code Section 30200 through Section 30265.5, as the Project is a mixed-use development located within an existing urbanized area and would be served with a variety of public transit options. Additionally, the Project would maintain and enhance public access by providing commercial facilities within residential development that would minimize the use of coastal access roads and would create and maintain publicly accessible open space areas. Therefore, the Project would not conflict with the policies set forth in Chapter 3 of the Coastal Act.

(b) Consistency with SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Project's general consistency with the applicable goals set forth in SCAG's 2020–2045 RTP/SCS is analyzed in Table 1 of Appendix G of this Recirculated Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing an integrated mixed-use development with multi-family residential, retail, restaurant, and office uses (Option B) onsite and in close proximity to a variety of public transit options provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. The Project would further the goals to support healthy and equitable communities, increase person movement and travel choices, and encourage development of diverse housing types in areas supported by multiple transportation options by providing for the development of diverse housing types and promoting alternative modes of transportation by including bicycle parking and supporting facilities within the Project Site. The Project would also promote walking in the area surrounding the Project Site by enhancing the surrounding sidewalks and providing a variety of pedestrian amenities under both Option A and Option B. Therefore, as discussed in detail in Appendix G of this Recirculated Draft EIR, the Project

would not conflict with the applicable goals of the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental impact.

(c) Consistency with Local Plans and Applicable Policies

(i) City of Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the General Plan Framework adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix G of this Recirculated Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, policies of the General Plan Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

Land Use Chapter

As demonstrated by the discussion in Table 2 included in Appendix G of this Recirculated Draft EIR, the Project would generally support and would not conflict with the applicable goals, objectives, and policies of the Framework Element's Land Use Chapter. Specifically, as detailed in Appendix G of this Recirculated Draft EIR, the Project would not conflict with the City's 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 as the Project would be located in an area well-served by public transit and would promote alternative modes of transportation, including walking and biking. The Project would also not conflict with the City's Policy 3.2.4 to provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial districts by introducing a mixed-use development within the Project Site that would feature a similar mix of land uses as the existing uses surrounding the Project Site. Additionally, the Project would develop mixed-use buildings that would be designed to be complementary to, and compatible with, surrounding uses. In addition, the Project would not conflict with Goal 3C to provide multi-family neighborhoods that enhance the quality of life for the City's existing and future residents by replacing the existing commercial uses and maximizing the potential of the existing site with a new mixed-use development that includes a variety of housing types integrated with neighborhood-serving commercial uses and office space (Option B) as well as publicly accessible open space and amenities for residents. The Project would further support Policy 3.13.4 to provide adequate transitions where commercial and residential uses are located adjacent to one another by providing the commercial uses at ground level and along Maxella Avenue while residential uses (Option A) and 1 acre of publicly accessible open space (Option B) would be provided along Glencoe Avenue, adjacent to multi-family residential uses across Glencoe Avenue. Overall, as detailed in Table 2 in Appendix G of this Recirculated Draft EIR, the Project

would not conflict with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element's Land Use Chapter.

Housing Chapter

As discussed in Table 2 in Appendix G of this Recirculated Draft EIR, the Project would support the goals of the Housing Chapter of the Framework Element. Specifically, the Project would support the City's Objective 4.1 to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types through the development of new multi-family residential units (including affordable units) consisting of studio, one-, and two-bedroom units. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit (Objective 4.2) by locating the Project in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus and in an area identified as a High-Quality Transit Area under the RTP/SCS. Therefore, as discussed in detail in Appendix G of this Recirculated Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Housing Chapter.

Urban Form and Neighborhood Design Chapter

As evaluated in Table 2 included in Appendix G of this Recirculated Draft EIR, the Project would support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element. In particular, the Project would support the City's Policy 5.7.1 to establish standards for transitions in building height as the Project is designed to step back from the lower-rise structures in the vicinity of the Project Site to provide adequate transitions between the existing adjacent uses and the Project buildings. Consistent with Policy 5.8.4 to encourage that signage be designed to be integrated with the architectural character of the buildings, Project signage would be designed to be aesthetically compatible with the existing and proposed architecture and with other signage in the surrounding neighborhood. The Project would also incorporate elements that would promote individual and community safety, as detailed in Table 2 of Appendix G of this Recirculated Draft EIR, and would not conflict with Objective 5.9 to encourage proper design and effective use of the built environment to help increase personal safety. Therefore, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

As discussed in Table 2 in Appendix G of this Recirculated Draft EIR, the Project would support the goals of the Open Space and Conservation Chapter of the Framework Element. Specifically, the Project would utilize development standards to promote development of public open space that is visible and safe (Policy 6.3), including providing

open space areas that are well-lit and visible to surrounding uses. Additionally, consistent with Policy 6.4.7 to consider as part of the City's open space inventory of pedestrian streets, privately-owned commercial open spaces that are accessible to the public, the Project includes publicly accessible open space areas under both Option A and Option B. Specifically, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. This open space area includes a one-story amenity building and additional seating located along the southwestern portion of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. Option B would also include a large landscaped publicly accessible open space area along Glencoe Avenue. This open space area would include seating areas and a water feature. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. In total, Option A would provide 70,175 square feet of open space in accordance with LAMC requirements and Option B would include 109,745 square feet of open space, exceeding LAMC open space requirements. In summary, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element's Open Space and Conservation Chapter.

Economic Development Chapter

As provided in Appendix G of this Recirculated Draft EIR, the Project would support the goals of the Economic Development Chapter of the Framework Element. Specifically, the Project would establish a balance of land uses that assures maximum feasible environmental quality (Objective 7.2) by introducing a diverse mix of complementary uses within the Project Site, including the development of residential units, neighborhood-serving commercial (retail/restaurant) uses, and office space under Option B. The proposed uses would complement the employment base of the Community Plan area and meet the needs of local residents, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution. The Project would also support the City's Policy 7.2.3 to encourage new commercial development in proximity to rail and bus transit corridors and stations by locating the Project in proximity to a transit corridor (Lincoln Boulevard) and in an area well-served by public transit. Thus, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Economic Development Chapter.

Transportation Chapter (Mobility Plan 2035)

As detailed in Table 2 included in Appendix G of this Recirculated Draft EIR, the Project would support the goals of Mobility Plan 2035. Specifically, consistent with Policy 1.6 to design detour facilities to provide safe passage for all modes of travel during times of construction, as part of Project Design Feature TR-PDF-1 included in Section IV.K,

Transportation, of this Recirculated Draft EIR, the Project Applicant would prepare and implement a worksite traffic control plan. The work site traffic control plan would identify the location of any temporary street parking or sidewalk closures, provide for the posting of signs advising pedestrians of temporary sidewalk closures and provide alternative routes, provide for the installation of other construction-related warning signs, and show access to abutting properties. Thus, in compliance with this policy, the Project would provide safe passage for all modes of travel during times of construction.

The Project would also recognize all modes of travel (Policy 3.1) by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. In particular, the Project would be designed to promote walkability in the Project Site vicinity by providing landscaped sidewalks and pedestrian connections adjacent to and throughout the Project Site. Specifically, Option A would include a landscaped public plaza at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo that would extend south to a proposed publicly accessible, privately maintained open space area. Option B would include a 1-acre publicly accessible open space area along Glencoe Avenue. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue under both options to activate these streets and provide a pedestrian-friendly environment. The Project would further promote alternative modes of transportation by providing bicycle parking spaces for the proposed uses. In addition, the Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus and in an area identified as a High-Quality Transit Area under the RTP/SCS. Thus, residents, workers, and visitors of the Project would be well-served by existing transit services. These features of the Project would support a number of policies of Mobility Plan 2035, including Policy 2.3 to recognize walking as a component of every trip, Policy 3.3 to promote equitable land use decisions that result in fewer vehicle trips, and Policy 5.2 to support ways to reduce vehicle miles traveled. The Project would also support the City's Policy 5.4 to encourage the adoption of low and zero-emission fuel sources and supporting infrastructure by providing 30 percent of the Project's Code-required parking spaces with electric vehicle-ready chargers and 10 percent of the Project's Code-required parking spaces further improved with electric vehicle charging stations as discussed in Section IV.E, Greenhouse Gas Emissions, of this Recirculated Draft EIR. Therefore, as further detailed in Table 2 of Appendix G of this Recirculated Draft EIR, the Project would not conflict with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035.

Infrastructure and Public Services Chapter

As discussed in Table 2 of Appendix G of this Recirculated Draft EIR, the Project would support the goals of the Infrastructure and Public Services Chapter of the Framework Element. Specifically, consistent with Goal 9P to include appropriate lighting,

Project lighting would include low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes; and low-level lighting to accent signage, architectural features, and landscaping elements. All on-site exterior lighting would be automatically controlled to illuminate only when necessary and, as set forth in Project Design Feature AES-PDF-6, would be shielded or directed toward areas to be illuminated. The Project would also implement best management practices (BMPs) to reduce runoff from entering the wastewater system and maximize opportunities to capture and infiltrate stormwater in support of Policy 9.3.1 to reduce the amount of hazardous substances and the total amount of flow entering the wastewater system and Objective 9.6 to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality. Furthermore, as evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area consistent with Objective 9.10 to ensure water supply is adequate to support planned development. Additionally, as further discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and no system upgrades would be required as a result of the Project. Therefore, as further detailed in Table 2 of Appendix G of this Recirculated Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Infrastructure and Public Services Chapter.

Based on the analysis above, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element.

(ii) Los Angeles General Plan Housing Element

The Project's consistency with the applicable objectives and policies set forth in the Housing Element of the General Plan that were adopted for the purpose of avoiding or mitigating an environmental effect is detailed in Table 3 of Appendix G of this Recirculated Draft EIR. As described therein, the Project would support the City's Objective 2.2 for promoting sustainable neighborhoods and Objective 2.3 to promote sustainable buildings by providing a mix of complementary uses within one site, including by providing new studio, one-bedroom, and two-bedroom multi-family residential apartment units, including affordable housing, along with neighborhood-serving commercial (retail/restaurant) uses, and office uses for Option B in an urbanized area with similar land uses. The Project would be located in close proximity to existing public services, facilities, and infrastructure, in addition to a variety of public transit services provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. The Project would also be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction. Such features would include energy-efficient

buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. These environmentally sustainable design features would further support Policy 2.3.2 to promote and facilitate reduction of water consumption in new housing, Policy 2.3.3 to promote and facilitate reduction of energy consumption in new housing, and Policy 2.3.4 to promote and facilitate reduction of waste in construction and building operations. In addition, the Project would support Objective 2.4 to promote livable neighborhoods with a mix of housing types, quality design, and a scale and character that respects unique residential neighborhoods in the City through the development of compatible uses and buildings that would be designed in a contemporary architectural style that would be complementary to, and compatible with, the surrounding uses. Overall, as detailed in Appendix G of this Recirculated Draft EIR, the Project would not conflict with the applicable objectives and policies set forth in the Housing Element of the City's General Plan.

(iii) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Project would support the goals and objectives of the Health and Wellness Element to provide housing in a safe, livable, and sustainable environment by providing a variety of open space areas within the Project Site, promoting walkability and biking, and implementing safety features. Specifically, the Project would include balconies, paved plazas with seating, landscaped pedestrian pathways, courtyard areas, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue under both Option A and Option B to activate these streets and provide a pedestrian-friendly environment. The Project is also located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Furthermore, the Project would allow for convenient access to public transit and would provide bicycle parking spaces for the proposed residential and commercial uses.

The Project would also incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.J.2, Public Services—Police Protection, of this Recirculated Draft EIR, the Project would include the following: a closed-circuit security camera system and keycard entry for the residential buildings and the residential parking areas; proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of the parking area to maximize visibility and reduce areas of concealment; and design of project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways to be open and in view of

surrounding sites, to the extent practicable. Therefore, the Project not conflict with the applicable goals and objectives set forth in the Health and Wellness Element.

(iv) Palms–Mar Vista–Del Rey Community Plan

As previously discussed, the land use designation for the Project Site under the Community Plan is Limited Manufacturing. The City has initiated a General Plan Amendment to amend the Project Site's Limited Manufacturing land use designation to the General Commercial land use designation to implement the Project. The Project's consistency with the goals, objectives, and policies set forth in the Palms–Mar Vista–Del Rey Community Plan is analyzed in Table 4 of Appendix G of this Recirculated Draft EIR. As discussed therein, the Project would be generally consistent with and would not conflict with the objectives and policies that support the goals of the Community Plan. Specifically, the Project would support the City's objectives and policies to protect the quality of the residential and commercial environment with attention to the site and building design (Policy 1-1.2). The Project would be designed in a contemporary architectural style that would be complementary to, and compatible with, the surrounding uses, thereby, protecting the quality of the residential environment and the appearance of the surrounding community.

In compliance with the Community Plan policies on police protection (Objective 8-1 and Policy 8-1.1), the Applicant will be required to consult with the LAPD Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project, as discussed in Section IV.J.2, Public Services—Police Protection, of this Recirculated Draft EIR. The LAPD was also consulted as part of the preparation of this Recirculated Draft EIR. The Project would also provide adequate lighting around the residential and commercial land uses and outdoor open spaces on the Project Site consistent with Policy 8-2.2. With regard to fire protection, as set forth in Section IV.J.1, Public Services—Fire Protection, of this Recirculated Draft EIR, the LAFD was consulted in conjunction with the preparation of this Recirculated Draft EIR, in support of Policy 9-1.1.

The Project would also encourage alternative modes of transportation over the use of single-occupant vehicles to reduce vehicles (Goal 11). Specifically, the Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. In addition, the Project includes bicycle parking to support the proposed residential and commercial uses. Furthermore, as discussed in Section II, Project Description, of this Recirculated Draft EIR, to enhance the streetscape, Option A would include a landscaped public plaza at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. The pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Option B would enhance the streetscape via a 1-acre

publicly accessible open space area located along Glencoe Avenue. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue under both options to activate these streets and provide a pedestrian-friendly environment. As such, the Project would promote the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips.

In summary, based on the above and as discussed in detail in Table 4 of Appendix G of this Recirculated Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Palms–Mar Vista–Del Rey Community Plan.

(v) Los Angeles Municipal Code

As previously discussed, the Project Site is zoned by the Los Angeles Municipal Code as [Q]M1-1 (Qualified Limited Industrial, Height District 1). The Limited Industrial zone permits a wide array of land uses. Specifically, the M1 zone permits any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. Height District 1 within the M1 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. The Q conditions also establish recycling and graffiti removal requirements for the Project Site.

The Project includes a City-initiated General Plan Amendment to amend the Project Site's land use designation from Limited Manufacturing to General Commercial and a Vesting Zone Change to change the zoning from [Q]M1-1 to (T)(Q)C2-2D. The C2 Zone permits a residential density in accordance with the R4 Zone (400 square feet per unit), which would allow the proposed multi-family units. Therefore, the proposed multi-family use as part of the Project would be permitted with approval of the General Plan Amendment and Vesting Zone Change. It is also noted that the residential and neighborhood-serving commercial uses proposed by the Project would be consistent with the uses in the Palms–Mar Vista–Del Rey Community Plan area and the residential and commercial uses immediately adjacent to the Project Site.

Option A would construct a mixed-use development that consists of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of

restaurant space. The proposed multi-family residential and commercial uses would be provided within three seven-story buildings with a maximum height of 77 feet. In accordance with the requirements of the LAMC, the proposed uses would be supported by 1,217 parking spaces, which would be distributed throughout the Project Site in two subterranean parking levels and in two above-grade parking levels located within each of the three buildings. The Project would include residential lobbies and leasing areas, pools, a spa, and outdoor kitchens with lounges and seating. In addition, per the requirements set forth in the LAMC, the Project would provide approximately 70,175 square feet of open space, including paved plazas with seating, landscaped paseos, and landscaped open space at the ground level that would be privately maintained and publicly accessible. Overall, the Project would remove approximately 100,781 square feet of existing commercial floor area and construct approximately 674,329 square feet of new residential and commercial floor area, resulting in a net increase of 573,548 square feet of net new floor area within the Project Site for a total FAR of approximately 2.6 to 1. Therefore, the Project requires a height district change from Height District 1 to Height District 2D. The proposed "D" limitation would permit a maximum FAR of 3:1 for the entire Project Site, in lieu of the maximum FAR of 6:1 otherwise permitted in Height District 2.

Option B would construct a mixed-use development that consists of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses. The proposed uses would be provided within four buildings ranging between four to seven stories. Specifically, the proposed residential uses would be within two six-story buildings with a height of up to 69 feet and a seven-story building with a height of up to 79 feet. The proposed office uses would be provided within a four-story building (three stories of office space above one level of ground floor commercial space) with a height of 69 feet. The proposed commercial uses would be provided on the ground floor of two of the three residential buildings and the proposed office building. In accordance with the requirements of the LAMC, the proposed uses would be supported by 1,287 parking spaces that would be distributed throughout the Project Site in three subterranean levels and in one above grade parking level. Option B would provide up to approximately 109,745 square feet of open space and recreational amenities, exceeding the requirements of the LAMC, including balconies, courtyard areas at the second level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas, as well as an approximately 1-acre publicly accessible open space area along Glencoe Avenue. Overall, Option B would remove approximately 100,781 square feet of existing floor area and construct 558,994 square feet of new floor area, resulting in a net increase of 458,213 square feet of net new floor area within the Project Site for a maximum total FAR of 2.15 to 1.

As discussed above, Height District 1 within the M1 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to

45 feet. The Q Conditions also provide that if any use not permitted in the MR1 zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. Therefore, the Project requires a height district change from Height District 1 to Height District 2D. The proposed "D" limitation would permit a maximum FAR of 3:1 for the entire Project Site, in lieu of the maximum FAR of 6:1 otherwise permitted in Height District 2.

With respect to height, the proposed mid-rise buildings would be compatible with existing mid-rise buildings in the vicinity of the Project Site, including the six-story multi-family Stella apartment complex to the west, the five-story Hotel MdR located southwest of the Project Site, the four-story apartment complex located northeast of the Project Site, and the two-story Marina Marketplace with three-story parking structure located north of the Project Site. Similarly, the proposed FAR for the Project would be consistent with other developments surrounding the Project Site, including the Stella Apartments directly to the west of the Project Site, which was approved in 2009 and completed in 2013 and included a general plan amendment from Industrial-Limited Manufacturing to General Commercial, a zone change from M1 to RAS4 and C4, and a height district change from Height District 1 to Height District 2. Therefore, the Project would be compatible and consistent with the existing mid-rise buildings in the vicinity of the Project Site.

Under the existing [Q]M1-1 zoning, the Project is not required by the LAMC to include front, rear, or side yard setbacks. With the approval of the vesting zone change from the M1 Zone to C2 Zone, no front, rear, or side yard setbacks would be required for non-residential uses. However, for residential uses, the Project requires a five-foot side yard setback minimum not to exceed 16 feet with an additional one foot for each story over two levels, and a 15-foot rear yard setback not to exceed 20 feet with an additional one foot for each story over the third level. As discussed in Section II, Project Description, of this Recirculated Draft EIR, Under Option A, Building 1 would be set back at least 43 feet from the property line along Maxella Avenue, which is considered the front yard, and at least 15 feet from the property line on the west (side yard). Building 2 would be set back at least 11 feet from the property line along Maxella Avenue (front yard). Building 2 and Building 3 would be set back at least 15 feet from the property line along Glencoe Avenue (side yard). Building 2 would be set back at least 10 feet from Glencoe Avenue. Building 3 would be set back at least 20 feet from the primary shopping center access driveway located south of the Project Site ingress and egress to Glencoe Avenue. Under Option B, Building 1 would be set back approximately 10 to 17 feet from the property line on the west (side yard). Building 1 does not front Maxella Avenue. Building 2 would be set back approximately 13 feet from the property line along Maxella Avenue. Building 3 would be set back approximately 38 feet to 129 feet from the property line along Glencoe Avenue. Building 3 would also be set back approximately 32 feet from the primary shopping center

access driveway providing ingress and egress to Glencoe Avenue located south of the Project Site. Thus, the Project would comply with all of the applicable setback requirements.

As discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, based on the parking requirements set forth in Sections 12.21 A.4.(a), Section 12.21 A.4.(c)(3), and LAMC Section 12.21 A.4.(c)(5) of the LAMC, Option A would require a total of 1,217 parking spaces and Option B would require a total of 1,287 parking spaces. As described in Section II, Project Description, of this Recirculated Draft EIR, Option A would provide a total of 1,217 parking spaces and Option B would provide a total of 1,287 parking spaces, and, therefore, would comply with the applicable parking requirements of the LAMC. In addition, in accordance with Section 12.21 A.16(a)(2) of the LAMC, Option A includes 752 bicycle parking spaces, including 80 short-term and 672 long-term bicycle parking spaces, and Option B includes 267 bicycle parking spaces including 219 long-term spaces and 48 short-term spaces.

The Project would also meet the requirements set forth in Section 12.21 of the LAMC concerning the provision of on-site open space under both options. Specifically, based on the proposed dwelling unit types, Option A includes at least 70,175 square feet of usable open space and therefore, would comply with the applicable open space requirements for Option A of 70,175 square feet set forth by the LAMC. Additionally, Option B would include up to 109,745 square feet of open space, which would exceed the applicable open space requirements for Option B of 45,825 square feet set forth by the LAMC.

In summary, with approval of the requested discretionary actions, the Project would be generally consistent with all applicable provisions of the LAMC.

(vi) City of Los Angeles Coastal Transportation Corridor Specific Plan

The Coastal Transportation Corridor Specific Plan includes purposes applicable to the Project. Specifically, the Project would support the purpose to encourage walking and bicycling as a means to safely and conveniently access transit and circulate within the neighborhood by enhancing pedestrian amenities within and adjacent to the Project Site as well as providing bicycle parking spaces and associated amenities (under Option B). In addition, the Project Site includes the development of housing, including affordable housing within proximity to jobs provided on the Project Site and in the Project Site vicinity. Therefore, the Project would be consistent with the applicable purposes outlined in the Specific Plan. The Project would also comply with the transportation mitigation standards and procedures set forth in Section 5 of the Specific Plan. In particular, as detailed in the Transportation Assessment included in Appendix G of this Recirculated Draft EIR, in consultation with LADOT, the Project's traffic analysis has considered the trip generation

rates provided in Appendix A of the Specific Plan. The Project's Transportation Assessment has been reviewed by LADOT and a copy of LADOT's Assessment Letter of the Transportation Assessment is included in Appendix G of this Recirculated Draft EIR. Also, as provided in Section IV.K, Transportation, of this Recirculated Draft EIR, and in the Transportation Assessment, the Project (under Option B) includes mitigation to address the transportation impacts of Option B.

(vii) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the ten Citywide Design Guidelines should be considered in a project, not all of the guidelines and supporting best practices will be appropriate in every case. The applicable guidelines are outlined below. As discussed, the Project would not conflict with the applicable guidelines of the Citywide Design Guidelines. Refer to Section IV.H, Land Use, of this Recirculated Draft EIR for a discussion of all of the Citywide Design Guidelines.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Under Option A, the proposed uses would be located within three buildings that would be constructed around a pedestrian paseo, which would provide pedestrian connections within and around the Project Site. From the pedestrian paseo and the public plaza proposed along the northwestern portion of the Project Site, pedestrians would be able to access Marina Marketplace shopping center-related uses across Maxella Avenue via the existing signalized pedestrian crosswalk along Maxella Avenue. At the southern terminus of the pedestrian paseo, pedestrians would be able to access Marina Marketplace shopping center-related uses south of the Project Site. Under Option B, the proposed uses would also be located within three buildings with pedestrian access provided from Maxella Avenue and Glencoe Avenue through the large park along Glencoe Avenue. Pedestrian pathways would also be provided through the Project Site.

Under both options, the proposed neighborhood-serving commercial uses would be located at the ground level, and landscaping and pedestrian amenities would be provided throughout the Project Site, which would further enhance the pedestrian experience. In addition, appropriate lighting would be incorporated in the design of the Project under both options and would provide efficient and effective on-site pedestrian lighting. Thus, the Project would not conflict with Citywide Design Guideline 1.

Guideline 2: Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.

Under Option A, the Project would provide 1,217 vehicle parking spaces within two subterranean parking levels and two above-grade parking levels in each of the three buildings. Vehicular access to the Project Site would be provided via five driveways, including two entry/exit driveways located along Ocean Way west of Building 1, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site.

Under Option B, the Project would provide 1,287 vehicle parking spaces within three subterranean levels, in one at grade parking level that would connect the four buildings, and in a small surface parking area. Vehicular access to the Project Site would be provided along Ocean Way, Maxella Avenue, and along the southern boundary of the Project Site. In addition, Option B would include a guest drop-off area along Ocean Way.

Under Option A and Option B, the entrance to the subterranean parking levels would be designed to match the style, materials, and color of the main building, thereby minimizing the appearance of driveways and parking areas. In addition, the Project would remove the existing surface parking areas within the Project Site, which includes a total of 418 parking spaces. Landscaping within the Project Site, including along Maxella Avenue and Glencoe Avenue, would further serve to integrate vehicular access and exit points into the design of the Project. Therefore, the Project would not conflict with Citywide Design Guideline 2.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project would improve the streetscape experience through building design, proposed streetscape amenities, and landscaping and open space improvements. Under Option A and Option B, the buildings would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. Both options would also include ground-level neighborhood-serving commercial uses, which would further maintain the human scale at street level. In addition, Option A would include a landscaped public plaza at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. Option B would include a large landscaped publicly accessible open space area along Glencoe Avenue that would extend from Maxella Avenue to the southern Project boundary. Under Option A and Option B, trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. Along the streetscape, Project signage would be appropriately scaled and aesthetically compatible with the architecture proposed for the

Project Site as well as the existing architecture in the surrounding area. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. As such the Project under Option A and Option B would not conflict with Citywide Design Guideline 3.

Guideline 4: Organize and shape projects to recognize and respect surrounding context.

As previously discussed, the Project design under both Option A and Option B would complement the surrounding uses, which primarily consist of commercial and residential uses, including a hotel, a shopping center, and multi-family residential uses. Currently, building heights in the surrounding area range from one story commercial uses to the north-northeast and south of the Project Site, to the six-story multi-family Stella apartment complex to the west. The Project would replace a two-story Barnes & Noble bookstore, a single-story building occupied by a United States Post Office and a variety of retail uses, and a two-story commercial and retail building. Under Option A, the Project would develop three seven-story mixed-use buildings. Under Option B, the Project would develop two six-story mixed-use buildings, one four-story office building (three stories of office space above one level of ground floor commercial space), and one seven-story residential building. Both options would include ground-floor neighborhood serving commercial uses. Under Option A and Option B, the buildings would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In addition, under Option A, the buildings that would be developed within the eastern portion of the Project Site (Building 2 and Building 3) would feature building step backs to reduce building bulk and to form landscaped terraces on the seventh floor that would, in conjunction with the amenity deck at the podium level, serve to reduce the apparent height and bulk of these buildings when viewed from Glencoe Avenue. Similarly, Option B would implement building step backs that would, in conjunction with the amenity deck at the second level and the large open space area that would be located along Glencoe Avenue, serve to reduce the perceived mass of the buildings when viewed from Glencoe Avenue. In addition, ground-level neighborhood-serving commercial uses would be provided under both options. These elements would ensure that the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The Project under both Option A and Option B would utilize distinguishable design features that would add visual interest while respecting the aesthetic character of the

surrounding area. Fundamental to the design concept are the materials that would create the contemporary architectural style that would be designed to visually unify the Project Site and complement the existing surrounding uses. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, louvers, simulated wood accents and exterior plaster, glass and metal railings, and integrated signage and lighting. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. Both Option A and Option B would include a variety of open space and recreational amenities, as well as trees and other landscaping features, which would further visually unify the Project Site. All of these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea that would be consistent with Citywide Design Guideline 5.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

The Project would enhance the streetscape adjacent to the Project Site by implementing active ground floor retail and restaurant uses in two of the three residential buildings and the proposed office building that would be highly visually permeable. The Project would also include planted areas along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. In addition, the Project would include low-level exterior lighting adjacent to the buildings and along pathways that would serve to enhance the safety of pedestrians at night.

Guideline 7: Carefully arrange design elements and uses to protect site users

As described above, the Project would include buildings that would be integrated and accessible via several pedestrian connections within and adjacent to the Project Site. The arrangement of buildings and uses would ensure that pedestrian activity remains along active pedestrian corridors. In addition, internal to the Project Site, pedestrian pathways would be provided along all driveways to minimize pedestrian-vehicular conflicts. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the commercial buildings.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized area and is currently developed with commercial uses and surface parking. There are no natural resources or features on the Project Site. Landscaping within the Project Site and along adjacent streets is limited to

ornamental shrubs and trees. As part of the Project, all trees to be removed within and adjacent to the Project Site would be replaced at a 1:1 and 2:1 ratio, respectively.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

As discussed in Section II, Project Description, of this Recirculated Draft EIR, the Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste. The Project would also incorporate water conservation features through low-water use plant selections and ultra-low flow indoor water fixtures.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project would manage stormwater through a capture and reuse system. This system would capture stormwater runoff that would then be used for irrigation of the new landscaping around the Project Site.

(d) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would not conflict with the whole of applicable goals, objectives, and policies in local and regional plans that were adopted to avoid or mitigate an environmental effect. As such, impacts related to conflicts with land use plans would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to conflicts with land use plans would be less than significant. Thus, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Recirculated Draft EIR, there are 14 related projects in the vicinity of the Project Site. The related projects generally consist of infill development including retail, restaurant, residential, and office uses. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory processes, and under CEQA review, as applicable. Therefore, as with the Project, the related projects would not conflict with applicable land use plans. Specifically, like the Project, related projects would be required to comply with certain regulations and City goals, objectives, and policies regarding environmental sustainability, consistent with the City's Green Building Code. In support of the City's goal to reduce VMT, it is anticipated that the related projects would also implement various methods to promote alternative modes of transportation, including providing bicycle parking spaces, which is a City requirement. Therefore, as discussed above, since the Project would not conflict with land use plans and since the related projects would be required to comply with applicable regulatory requirements, the Project's contribution to land use impacts would not be cumulatively considerable. **As such, overall cumulative impacts related to conflicts with land use plans, regulations, goals, objectives, or policies would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to conflicts with land use plans would be less than significant. Thus, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.