

IV. Environmental Impact Analysis

E. Land Use and Planning

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts with regard to conflicts with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impacts related to the physical division of an established community was evaluated in the Initial Study prepared for the Project and included in Appendix A of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Regional

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), which addresses the attainment of State and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

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

SCAG's 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The mission of the 2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the plan, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. As part of this approach, the 2016–2040 RTP/SCS establishes commitments to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing and

environmental planning in order to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS).

The 2016–2040 RTP/SCS also establishes High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within an HQTAs as designated by the 2016–2040 RTP/SCS.^{1,2}

On September 1, 2020, SCAG’s Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.³ As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.⁴ On October 30, 2020, the California Air Resources Board (CARB) made the determination that the 2020–2045 RTP/SCS would meet the region’s GHG reduction target. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. As was the case under the prior RTP/SCS, the Project Site is located within an HQTAs as designated by the 2020–2045 RTP/SCS.⁵ The Project’s consistency with applicable goals of the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals of the RTP/SCS applicable to the Project Site is included in Table 1 of Appendix E of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal.

(b) South Coast Air Quality Management District Air Quality Management Plan

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and State air pollution standards. In

¹ SCAG, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016, Exhibit 5.1.

² Los Angeles County Metropolitan Transportation Authority (Metro), *High Quality Transit Areas—Southwest Quadrant map*.

³ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal*, September 3, 2020.

⁴ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal*, September 3, 2020.

⁵ SCAG, *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, adopted September 2020, Exhibit 3.4.

conjunction with SCAG, SCAQMD has prepared the 2016 AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of State and federal air quality standards in the South Coast Air Basin. Refer to Section IV.B, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the AQMP.

(c) Los Angeles County Metropolitan Transportation Authority Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

(2) Local

At the local level, several plans, policies, and regulatory documents guide development within the City of Los Angeles (City), including the City of Los Angeles General Plan (General Plan) and Los Angeles Municipal Code (LAMC), which govern land use through specific development and design standards and building and safety codes. The City's West Los Angeles Community Plan (Community Plan) constitutes the local land use policy standard for the Project Site and Community Plan area. In addition, the Project is subject to the Citywide Design Guidelines. Applicable plans and associated regulatory documents/requirements are described below.

(a) City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a General Plan, which is a comprehensive long-term document that provides principles, policies, and

objectives to guide future development. A number of these principles, policies, and objectives serve to mitigate environmental effects.

The City's General Plan is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development. The General Plan sets forth goals, objectives, and programs to guide land use policies and to meet the existing and future needs of the community. The General Plan consists of a series of documents which includes the seven State-mandated elements: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the City of Los Angeles General Plan Framework Element (Framework Element). The Land Use Element is composed of 35 area plans known as Community Plans that guide land use at the community level. The Project Site is located within the boundaries of the West Los Angeles Community Plan area.

(i) Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines Citywide policies for land use, housing, urban form/neighborhood design, open space/conservation, economic development, transportation, and infrastructure and public services.

(1) Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes these land use categories, which are described by ranges of intensity/density, heights, and lists of typical uses. Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. These land use categories are intended to serve as a guideline for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City.⁶ The

⁶ As indicated in Chapter 1 of the Framework Element, it neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and the City's Community Plans. The Framework Element expressly states that it "is not sufficiently detailed to impact requests for entitlements on individual parcels. Community Plans will be more specific and will be the major documents to be looked to for consistency with the General Plan for land use entitlements." The Executive Summary of the
(Footnote continued on next page)

Project Site is not identified as being located within any of these categories (it is located just west of the Century City Regional Center).⁷

(2) Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter provides the following policies to achieve this goal:

- 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.

(3) Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines "urban form" as the City's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods and communities. 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 updating the community plans. 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.

Framework Element similarly states that it "does not convey or affect entitlements for any property." Precise determinations are made in the Community Plans.

⁷ City of Los Angeles, *City of Los Angeles General Plan Framework, Land Use Element, Figure 3-3, Long Range Land Use Diagram for West/Coastal Los Angeles, February 19, 2003.*

(4) Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City's residents, and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to address the City's open space issues. Specifically, this chapter contains open space goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

(5) Economic Development Chapter

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods.

(6) Transportation Chapter

As an update to the prior Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 in August 2015. Mobility Plan 2035 was readopted in January 2016 and again in September 2016.⁸ Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through Mobility Plan 2035, which is discussed further below.

(7) Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. 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,

⁸ Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.*

watershed management, and others). 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 Site is included in Table 2 of Appendix E of this 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

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, the Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:⁹

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

Each of the goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in the Mobility Plan 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 Mobility Plan 2035 applicable to the Project Site is included in Table 3 of Appendix E of this Draft EIR along

⁹ *City of Los Angeles Department of City Planning, Mobility Plan 2035: An element of the General Plan, last adopted by City Council on September 7, 2016.*

with a discussion of whether the Project does or does not conflict with that particular goal, objective, or policy.

(iii) Los Angeles General Plan Housing Element

Adopted in December 2013, the Housing Element 2013–2021 identifies four primary goals and associated objectives, policies and programs. The goals are as follows:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs;
- A City in which housing helps to create safe, livable and sustainable neighborhoods;
- A City where there are housing opportunities for all without discrimination; and
- A City committed to ending and preventing homelessness.

The Project's consistency with the applicable goals, objectives, and policies set forth in the Housing 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 Housing Element applicable to the Project Site is included in Table 4 of Appendix E of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular objective or policy.

(iv) Los Angeles General Plan Conservation Element

The Conservation Element primarily addresses 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.¹⁰

The Project's consistency with applicable policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

¹⁰ City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.

(b) West Los Angeles Community Plan

The land use policies and standards of the Framework Element and the General Plan elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the City, defining locally the Framework Element's more general policies and programs and are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community. The Project Site is located within the West Los Angeles Community Plan area. Adopted on July 27, 1999, the Community Plan sets forth goals and objectives to maintain the community's distinctive character by:

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible housing opportunities.
- Improving the function, design and economic vitality of commercial and industrial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around future transit systems while minimizing any adverse impacts.
- Preserving and strengthening commercial and industrial developments to provide a diverse job-producing economic base; and through design guidelines and physical improvements, enhance the appearance of these areas.

As shown in Figure IV.E-1 on page IV.E-10, the Community Plan's land use designation for the Project Site is Neighborhood Commercial. According to the Community Plan, Neighborhood Commercial uses include one to four story neighborhood-serving retail and office uses with a mix of residential units.¹¹ The Neighborhood Commercial designation corresponds to the City's C1 (Limited Commercial), C1.5 (Limited Commercial), C2 (Commercial), C4 (Commercial), RAS3 (Residential/Accessory Services), RAS4

¹¹ *City of Los Angeles, West Los Angeles Community Plan, adopted July 27, 1999.*

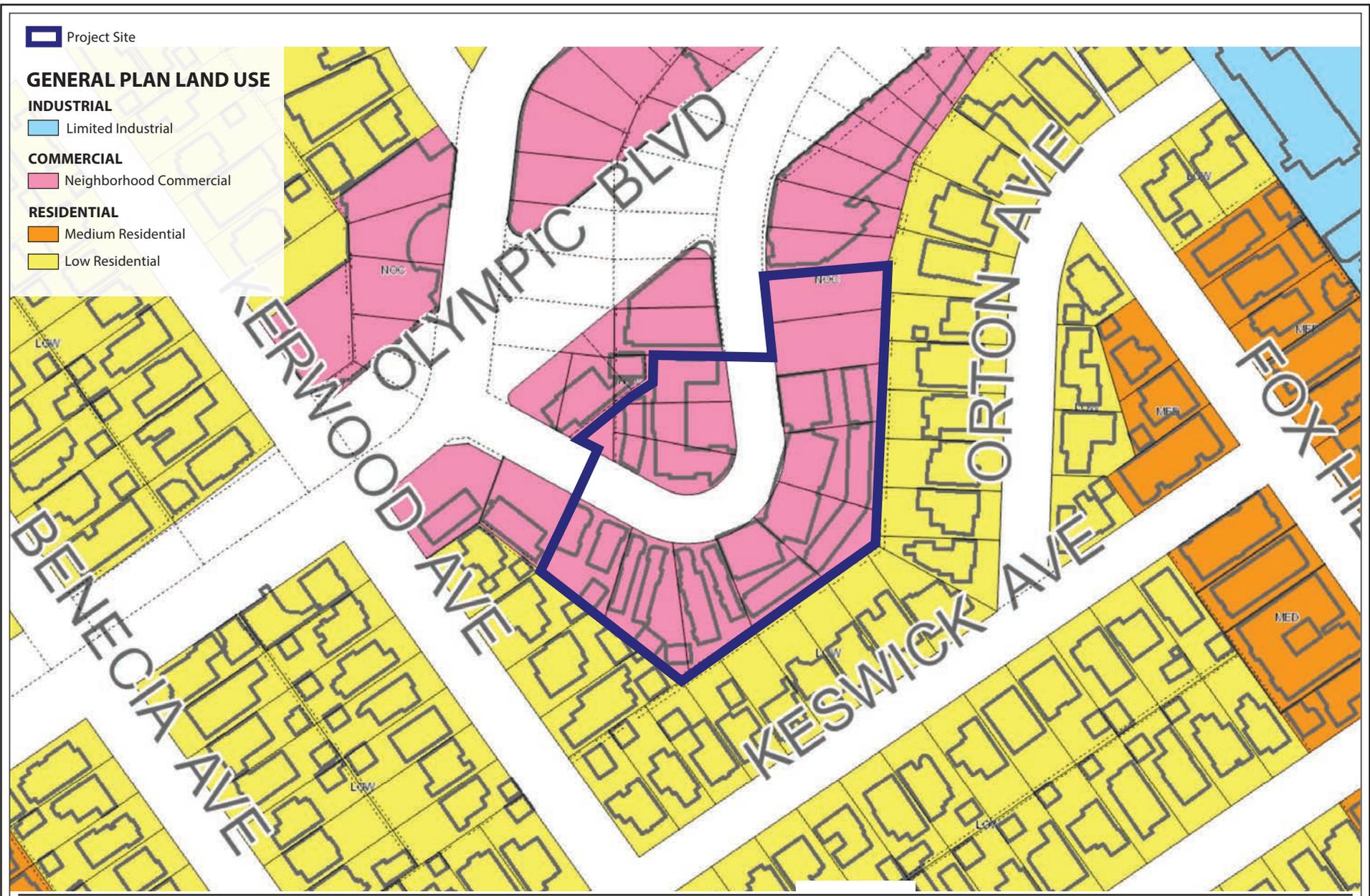


Figure IV.E-1
Land Use Designation on the Project Site

Source: City Los Angeles ZIMAS; Eyestone Environmental, 2019.

(Residential/Accessory Services), and P (Automobile Parking) zones in the LAMC, as well as zones referenced in the LAMC as permitted by such zones.¹²

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 Site is included in Table 5 of Appendix E of this Draft EIR along with a discussion of whether the Project conflicts or does not conflict with that particular goal, objective, or policy.

(c) Los Angeles Municipal Code (LAMC)

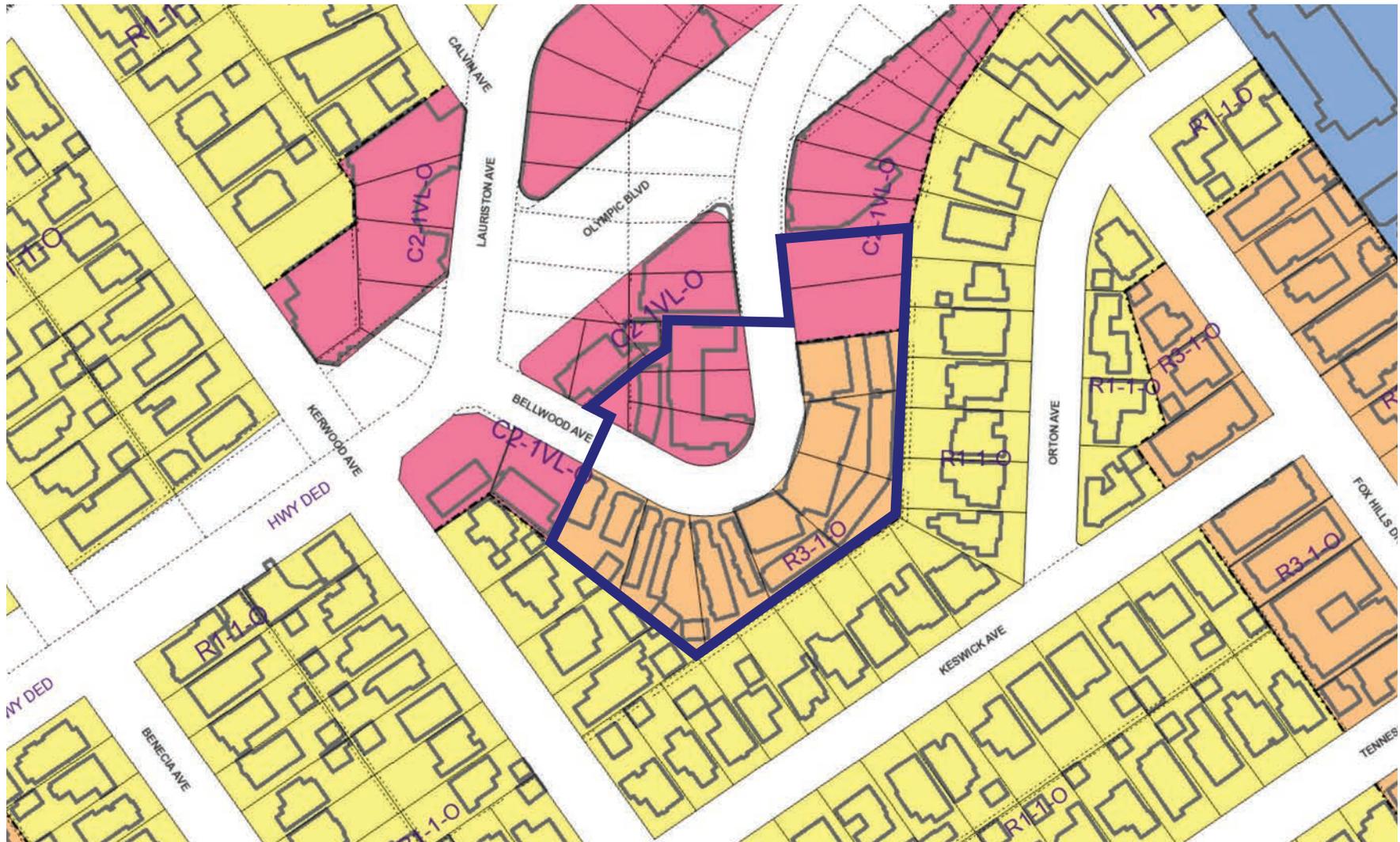
The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Figure IV.E-2 on page IV.E-12, the Project Site is zoned by the LAMC as R3-1-O (Multiple Residential, Height District 1, Oil Drilling)¹³ and C2-1VL-O (Commercial, Height 1VL, Oil Drilling).¹⁴ The R3 zone permits a wide variety of residential uses, including group dwellings, multiple dwellings, apartment houses, boarding houses, rooming houses, accessory uses and home occupations, senior independent housing, and assisted living care housing. The C2 zone permits a wide variety of uses, including, but not limited to, eldercare facilities, multiple dwellings, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, sanitariums, clinics, and schools. Height District 1 within the R3 Zone limits building heights to 45 feet and the floor-area ratio (FAR) to 3:1. Height District 1VL within the C2 Zone limits building heights to 45 feet and three stories (except that there is no restriction on the number of stories for buildings used entirely for residential purposes) and the FAR to 1.5:1. The "O" designation indicates the Project Site is located within an Oil Drilling District where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted.

As discussed in detail in Section IV.A. Aesthetics of this Draft EIR, the City has identified areas that meet the definition of a Transit Priority Area (TPA) as specified in SB 743. Specifically, City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides instruction concerning the definition of projects within a TPA and states that aesthetic and parking impacts shall not be considered an impact for infill

¹² City of Los Angeles, *West Los Angeles Community Plan, General Plan Land Use Map*, footnote 8. Per LAMC section 12.14.A.4, uses permitted in the C2 zone include uses permitted in the C1.5 zone, which includes the C1 and R3 zone uses per LAMC sections 12.13.5.A.1 and 12.13.A.

¹³ The R3 zoning applies to Lots 29-35 of Block 13 of Tract 7260.

¹⁴ The C2 zoning applies to Lots 36-37 of Block 13 of Tract 7260 and Lots 10-13 of Block 14 of Tract 7260.



GENERALIZED ZONING

- C2
- R1
- Project Site
- R3
- CCS

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

projects within TPAs pursuant to CEQA.¹⁵ The City's Zone Information and Map Access System (ZIMAS) identifies portions of the Project Site (specifically APNs 4315-018-032, -033, -034, and -048) as located within a TPA as defined by City ZI File No. 2452.¹⁶

(d) West Los Angeles Transportation Improvement and Mitigation Specific Plan

The Project Site is also located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP), adopted March 8, 1997 and amended June 28, 2019. The WLA TIMP is a transportation Specific Plan for a broad area between the Hollywood Hills to the north, the City of Santa Monica boundary to the west, the City of Culver City boundary to the south, and the City of Beverly Hills boundary to the east. The WLA TIMP is intended to regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses, and promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies.

The WLA TIMP is intended to provide a mechanism to fund specific transportation improvements that would mitigate transportation impacts generated by new development. A Transportation Impact Assessment (TIA) process and fee has been established for new development with residential land uses. However, the WLA TIMP exempts eldercare facilities from the TIA fee.¹⁷ The plan ensures that the public transportation facilities that will be constructed with these funds will significantly benefit the contributor.

Projects subject to the WLA TIMP that generate over 100 P.M. peak-hour vehicle trips may also be required to implement a transportation demand management (TDM) program satisfactory to the City of Los Angeles Department of Transportation (LADOT). This requirement is intended to promote or increase work-related ridesharing and transit use as well as bicycling to reduce peak hour vehicle trips. The WLA TIMP is also intended to promote area-wide transit enhancement through the addition of transit lines, shuttles, transit centers and other such facilities that expedite transit flow. Finally, the WLA TIMP is intended to promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods.

¹⁵ *City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA,*

¹⁶ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 4315-018-029, -030, -031, -032, -033, -034, and -048, <http://zimas.lacity.org/>, accessed February 17, 2021.*

¹⁷ *City of Los Angeles Municipal Code, Section 19.19.D.1.j.*

The Project would not be subject to WLA TIMP requirements, including payment of TIA fees or implementation of a TDM program, because the Project would be an eldercare facility project.

(e) 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 adopted by the City Planning Commission in June 2011 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 Citywide Design Guidelines are intended to “carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions” and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist.

(f) 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), Public Recreation Plan, Los Angeles Department of Water and Power (LADWP) 2015 Urban Water Management Plan (UWMP), Sustainable City pLAN/L.A.’s Green New Deal, 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 Draft EIR.

b. Existing Conditions

(1) Project Site

The 2.22-acre (96,792 square feet) Project Site¹⁸ is located at 10328–10384 and 10341–10381 Bellwood Avenue within the West Los Angeles Community Plan area of the

¹⁸ *The lot area following the proposed merger and subdivision, including the vacated and realigned portion of Bellwood Avenue and excluding an anticipated five-foot right-of-way dedication on a portion of (Footnote continued on next page)*

City. More specifically, the Project Site includes seven parcels that form an irregularly shaped site along both sides of Bellwood Avenue which bifurcates the Project Site in a U-shape with both ends connecting to Olympic Boulevard. The Project Site is currently developed with three multi-family residential developments totaling 43,939 square feet, including 112 units in: a 13-unit building located at 10341-10381 Bellwood Avenue; seven two-story buildings with a total of 82 units located at 10328-10366 Bellwood Avenue; and six bungalow court buildings located at 10368-10384 Bellwood Avenue with a total of 17 units. The Project Site also contains surface parking and small landscaped areas (including 66 non-protected trees and 8 street trees) and has surface topography that generally slopes down from south to north with a grade difference of up to 42 feet.

Direct vehicular access to the Project Site is provided from driveways off Bellwood Avenue, with local access provided by Olympic Boulevard, Beverly Glen Boulevard, and Pico Boulevard, and regional access provided by Santa Monica Boulevard (CA-2), the Santa Monica Freeway (I-10), and the San Diego Freeway (I-405), all of which are accessible within 2 miles of the Project Site. Public transit service in the vicinity of the Project Site is currently provided by Metro, Culver City Bus, Santa Monica Big Blue Bus, Antelope Valley Transit Authority, Santa Clarita Transit, and LADOT Commuter Express. Transit lines within 0.25 mile of the Project Site include Culver City Bus Route 3 and Santa Monica Big Blue Bus Route 5. In addition, Section 2 of Metro's Purple Line Extension Transit Project is currently under construction in the vicinity of the Project Site. This section of Metro's Purple Line Extension includes a subway station at Constellation Boulevard and Avenue of the Stars, approximately 0.5 mile northeast of the Project Site.

As discussed previously, the Project Site is currently designated as Neighborhood Commercial by the Community Plan, with two of the Project Site lots south of Bellwood Avenue and four of the Project Site lots north of Bellwood Avenue zoned C2-1VL-0 (Commercial, Height District 1 VL, Oil Drilling),¹⁹ and seven of the nine Project Site lots south of Bellwood Avenue zoned R3-1-0 (Multiple Residential, Height District 1, Oil Drilling).^{20,21} The Project Site is also located within the WLA TIMP Specific Plan area.²²

Bellwood Avenue, would be 93,422 square feet or 2.14 acres. The total lot area may vary depending on the ultimate configuration and designation of the realigned portion of Bellwood Avenue.

¹⁹ The C2 zoning applies to Lots 36-37 of Block 13 of Tract 7260 and Lots 10-13 of Block 14 of Tract 7260.

²⁰ The R3 zoning applies to Lots 29-35 of Block 13 of Tract 7260.

²¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 4315-018-029, -030, -031, -032, -033, -034, and -048, <http://zimas.lacity.org/>, accessed February 17, 2021.

²² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 4315-018-029, -030, -031, -032, -033, -034, and -048, <http://zimas.lacity.org/>, accessed February 17, 2021.

Finally, portions of the Project Site (specifically APNs 4315-018-032, -033, -034, and -048) are located within a TPA identified by the City's ZIMAS.^{23,24} The Project Site is also located within an HQTA as designated by SCAG.²⁵

(2) Surrounding Uses

The portion of the Project Site located generally north of Bellwood Avenue is bounded by the Century Park hotel to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west that includes a dry cleaner/laundry service and a smog check station. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel and Bellwood Avenue to the north, single-family residential uses to the east, and south, and a beauty salon to the west. A grocery store is located across Olympic Boulevard to the north, and a Goodwill Donation Center to the west. The greater Project Site vicinity is developed with a mix of commercial and both single- and multi-family residential uses. The Project Site is located approximately 0.9 mile west of the Fox Studio Lot and approximately 0.5 mile south of the Century City commercial district.

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 and planning if it would:

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

Threshold (b): Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

²³ City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 4315-018-029, -030, -031, -032, -033, -034, and -048*, <http://zimas.lacity.org/>, accessed November 13, 2018.

²⁴ PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

²⁵ SCAG 2016–2040 RTP/SCS, Exhibit 5.1: *High Quality Transit Areas In The SCAG Region For 2040 Plan*, p. 77.

As discussed below, the Project's potential impact regarding the physical division of an established community set forth in Threshold (a) was evaluated in the Initial Study included in Appendix A of this Draft EIR and impacts were determined to be less than significant. As such, the analysis herein focuses on Threshold (b), and the following associated factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide are used as appropriate.

(1) 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 whether the Project conflicts with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect is based upon a review of plans, policies, and regulations that are applicable to the Project Site. 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 would 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:

...if 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 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. 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.²⁶ Generally, given that land use plans reflect a range of competing interests, a project should be compatible 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 are proposed with regard to land use.

d. Analysis of Project Impacts

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project Site is currently developed with three multi-family residential developments totaling 112 units and includes the portion of Bellwood Avenue that bifurcates the Project Site. Bellwood Avenue is a short, u-shaped street that connects to Olympic Boulevard at each end. The Project would replace the existing multi-family residential uses within the Project Site with a new residential eldercare facility with 192 senior housing residential units comprised of 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. Additionally, as part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned as a private street.²⁷ However, through public access would be maintained, and access to Olympic Boulevard from adjacent properties along Bellwood Avenue would continue to be available. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. Thus, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

Threshold (b): Would the Project conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

²⁶ Office of Planning and Research (OPR), *State of California General Plan Guidelines (2017)*.

²⁷ The reconfigured Bellwood Avenue is currently proposed to become a private street; however, in the event Bellwood Avenue remains a public street, the Project would still implement the proposed vacation and realignment and through public access would also be maintained.

(1) Impact Analysis

(a) Consistency with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Project's general consistency with the applicable goals set forth in the 2016–2040 RTP/SCS is analyzed in Table 1 of Appendix E of this Draft EIR. Applicable goals include Goals 2, 4, 5, 6, 7, 8, and 9 related to improving mobility and accessibility, ensuring a sustainable transportation system, maximizing the productivity of the transportation system, protecting the environment and health of residents, encouraging land use that facilitates transit and active transportation, and encouraging energy efficiency. The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is also analyzed in Table 1 of Appendix E of this Draft EIR. These include goals 2, 4, 5, 6, 8, and 9 that are similar to the applicable goals in the 2016–2040 RTP/SCS. As detailed therein, the Project would not conflict with these applicable goals set forth in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would increase density on an already developed urban infill site in a City-designated TPA and SCAG-designated HQTAs in close proximity to shopping, services and transit, and served by an established network of roads and freeways. Furthermore, the Project would provide: (1) bicycle parking spaces meeting LAMC requirements that would serve to promote use of bicycles; (2) enhanced sidewalks with new street trees and other improvements along the Project Site's Bellwood Avenue frontage; (3) electric vehicle charging stations; (4) shuttle service for the Project's residents; and (5) a range of senior housing unit types to assist in addressing the demand for senior housing in the City, with a variety of on-site amenities on-site and connectivity to local services.

The Project would also develop a sustainable building which minimizes adverse effects on the environment and minimizes the use of non-renewable resources by complying with Title 24 energy conservation requirements and incorporating the environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. Furthermore, the Project would represent smart growth²⁸ and sustainable development by intensifying density on an urban infill site within a TPA and in proximity to transit, providing shuttle service for the Project's residents, and providing charging stations for electric vehicles. Overall, as evaluated in Section IV.C, Energy, of this Draft EIR, the Project would not result in the wasteful or inefficient use of energy, and impacts would be less than significant.

²⁸ *Smart growth is an approach to development that encourages a mix of land uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. See "Smart Growth Principles" in SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, pp. 174–175.*

In addition, as indicated in Section IV.I, Transportation, of this Draft EIR, the Project would reduce daily vehicle trips when compared with existing conditions and would result in less-than-significant impacts to the transportation system.²⁹

Based on the above, the project would not conflict with the applicable RTP/SCS goals related to maximizing mobility and accessibility, ensuring a sustainable transportation system, maximizing the productivity of the transportation system, protecting the environment and health of residents, encouraging land use that facilitates transit and active transportation, and encouraging energy efficiency.

(b) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with applicable goals, policies, and objectives of the General Plan, including the Framework Element, Housing Element, Conservation Element, and Mobility Plan 2035; the Community Plan; LAMC, the WLA TIMP, the Citywide Design Guidelines that were specifically adopted for the purpose of avoiding or mitigating environmental effects.

(i) Los Angeles General Plan

(1) Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 2 of Appendix E of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect. Also refer to Section IV.A, Aesthetics, for further discussion of the Project's consistency with applicable goals, objectives, and policies set forth in the Framework Element governing scenic quality.

(a) Land Use Chapter

The Project would support the City's applicable objectives and policies of the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect. In particular, the Project would: (1) provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled (VMT) and air pollution (e.g., Objectives

²⁹ Gibson Transportation Consulting, *Transportation Assessment for Senior Residential Community at the Bellwood Project*, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

3.2 and 3.18) through development of on an urban infill site served by existing infrastructure in a TPA within close proximity to shopping, services and transit, and providing pedestrian improvements such as pedestrian pathways and courtyards throughout the Project Site;³⁰ (2) provide for the development of streetscape improvements (Policies 3.8.4 and 3.10.4) by providing widened sidewalks, new street trees and other streetscape improvements along portions of Bellwood Avenue, and providing a pedestrian path within the Project Site; and (3) designing multi-family residential development to minimize traffic and noise and that incorporates recreational and open space amenities for Project residents (Policy 3.13.6) by proposing development that would result in less than significant transportation impacts and reduced VMT; locating parking, loading, service, trash, laundry and kitchen facilities within the proposed building to minimize operational noise; and includes 14,630 square feet of open space (e.g., courtyards, outdoor bistros, landscaped terraces, walkways, etc.), which is in excess of the 7,800 square feet of open space required by the LAMC. Therefore, as detailed in Table 2 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Land Use Chapter.

(b) Housing Chapter

The Project would support the City's objective to plan the capacity for and develop incentives to encourage production of housing units of various types to meet the projected housing needs by income level of the future population (Objective 4.1) by providing a project that would include 192 much needed senior housing residential units, including 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. This growing need for eldercare facilities in the City is demonstrated by the fact that approximately 10 percent of the City's population is aged 65 years and older,³¹ and that this age distribution is expected to almost triple by 2035 in the greater Los Angeles area.³² In recognition of this need, the LAMC was amended in 2006 by the City Council (Ordinance No. 178,063) to allow eldercare housing within residential and commercial zones, including the R3 and C2 zones (the zoning of the Project Site), subject to the approval of the Zoning Administrator, when the Eldercare Facility does not meet the use, area, or height provisions of the respective zone. The Project would also support the City's objective to encourage the location of new multi-family housing in proximity to transit (Objective 4.2) by developing senior housing and intensifying urban density on an urban infill site within a TPA in close proximity to shopping, services, and transit.

³⁰ Gibson Transportation Consulting, *Transportation Assessment for Senior Residential Community at the Bellwood Project*, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

³¹ According to United States Census 2010 data presented in Chapter 1. *Housing Needs Assessment of the General Plan Housing Element*, page 1-5.

³² Chart 1.2 "Change in Age Distribution: Past and Projected, 2000–2010 & 2010–2035" from *Housing Element*.

Therefore, as detailed in Table 2 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Housing Chapter.

(c) Urban Form and Neighborhood Design Chapter

The Project would promote the City's goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project. Specifically, the Project would encourage proper design and effective use of the built environment to help increase personal safety (Objective 5.9), and utilize development standards to promote development of open space that is as safe as possible (Policy 6.3.3) by incorporating a range of security features including, but not limited to, private on-site security personnel, a closed circuit security camera system, restricted access, security lighting, and maximizing visibility and minimizing areas of concealment. These measures would reduce the demand for police protection services, thereby avoiding the need for new facilities.

Therefore, as detailed in Table 2 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

(d) Open Space and Conservation Chapter

The Project would support the goals and policies of the Open Space and Conservation Chapter. Specifically, while the Project would not include open space that could be added to the City's open space inventory such as public plazas, shared school playfields, farmers markets, privately-owned commercial open space accessible to the public, etc. (e.g., Policies 6.4.7 and 6.4.8), it would include open space and recreational facilities for its senior residents, including a ground-level central courtyard, outdoor bistro terrace, multiple landscaped terraces, a walkway around the westerly, southerly and easterly setbacks connecting to the ground-level open space areas, and other landscaped areas which would reduce demand for existing City facilities. In all, the Project would provide 14,630 square feet of open space for Project residents, which would exceed the 7,800 square feet required by the LAMC. The Project would also provide sidewalk and streetscape improvements along its Bellwood Avenue frontage which would promote pedestrian activity and reduce VMT. Therefore, as detailed in Table 2 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter.

(e) Economic Development Chapter

The Project would support the goals and policies of the Economic Development Chapter. Specifically, the Project would assist in providing a range of housing opportunities

to accommodate future population growth and locate new housing that is accessible to local services and transportation (e.g., Objective 7.9) by: (1) providing a new eldercare facility and increasing residential density on an urban infill site within a TPA in close proximity to shopping, services, and transit; (2) providing job-generating uses within a TPA (as an eldercare facility that would produce jobs related to living assistance); and (3) reducing VMT while at the same time resulting in less-than-significant traffic impacts³³ and less-than-significant air quality impacts.³⁴ Based on the above, and as detailed in Table 2 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Economic Development Chapter.

(f) Infrastructure and Public Services Chapter

The Project would support the relevant objectives and policies of the Infrastructure and Public Services Chapter. The Project would reduce the amount of hazardous substances entering the wastewater system (Policy 9.3.1) in that it would implement Best Management Practices (BMPs) and erosion control measures under the required Stormwater Pollution Prevention Plan (SWPPP) to minimize the potential for pollutants and sediment in stormwater runoff from the Project Site during the construction period, and would implement the required Standard Urban Stormwater Mitigation Plan (SUSMP) to do the same during operation. With implementation of the proposed infrastructure upgrades, including the upsizing of the water line along Bellwood Avenue, water supply, storage facilities and delivery systems would be adequate to serve the Project (Goal 9C and Objective 9.10).³⁵ In addition, the Project would comply with the City's Low Impact Development (LID) requirements and would thus improve water quality and provide adequate drainage throughout the Project Site. Therefore, as detailed in Table 2 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies of the Framework Element's Infrastructure and Public Services Chapter.

(2) Mobility Plan 2035

The Project would support the relevant policies of the Mobility Plan 2035. The Project would be designed and operated to prioritize the safety of the most vulnerable roadway users (Policy 1.1) by developing the proposed Bellwood Avenue realignment and sidewalk and streetscape improvements in accordance with City requirements. The Project

³³ Gibson Transportation Consulting, *Transportation Assessment for Senior Residential Community at the Bellwood Project*, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

³⁴ See Section IV.B, Air Quality, of this Draft EIR.

³⁵ Fuscoe Engineering, Inc., *Water, Sewer and Energy Infrastructure Assessment Report—Senior Residential Community at the Bellwood*, February 2020. Included as Appendix J of this Draft EIR.

would design detour facilities to provide safe passage for all modes of travel during construction (Policy 1.6) by: (1) implementing a Construction Management Plan and work site traffic control plan during construction that includes temporary traffic controls adjacent to public rights-of-way on public roadways to provide for safe passage for all modes of travel and access to all adjacent properties during the construction period; and (2) submitting for LADOT review work site traffic control plan identifying the location of any temporary roadway lane and/or sidewalk closures needed during construction. The Project would recognize walking as a component of every trip and ensure high quality pedestrian access (Policy 2.3) by providing sidewalk and streetscape improvements along the Project's Bellwood Avenue frontage, gating the Project Site for privacy and safety, providing on-site pedestrian facilities, and designing and constructing all Project pedestrian improvements, building entrances and corridors, elevators, and parking areas in accordance with Americans with Disabilities Act (ADA) requirements. The Project would recognize all modes of travel (Policy 3.1), promote land use decisions that result in fewer vehicle trips (Policy 3.3) and reduce VMT (Policy 5.2) by intensifying urban density on an urban infill site in close proximity to shopping, services, and transit; providing on-site pedestrian facilities and sidewalk improvements along its Bellwood Avenue frontage; providing on-site bicycle parking; and providing shuttle service for the Project's senior residents. The Project would encourage adoption of low and zero emission fuel sources (Policy 5.4) by providing charging stations for electric vehicles and constructing the Project in accordance with the environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. Therefore, as detailed in Table 3 of Appendix E of this Draft EIR, the Project would not conflict with the applicable objectives and policies of Mobility Plan 2035.

(3) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element that were adopted for the purpose of avoiding or mitigating an environmental effect is detailed in Table 4 of Appendix E of this Draft EIR. As discussed therein, the Project would support the objectives to facilitate new construction of a range of different housing types within a TPA that addresses the particular needs of the City's households (Policy 1.1.3) and ensure that housing opportunities are accessible to all residents by providing a range of much needed senior housing types (independent living, assisted living and memory care units) in accordance with State requirements for senior housing.

The Project would support sustainable neighborhoods that have jobs, amenities, services, and transit (Objective 2.2), and that integrates housing with other compatible uses (Policy 2.2.1) by: (1) increasing urban density on an urban infill site within a TPA in proximity to shopping, services, and transit; and (2) including a range of housing types in a mixed-use Neighborhood District, which would reduce VMT; and (3) being compatible with adjacent development (e.g., the Project would include a stepped building design with

landscaped buffers that would provide a buffer between the Project and the residential uses to the south, and the Project would also serve as a transition between the commercial uses to the north and the single-family residential uses to the south). The Project would develop sustainable buildings, and promote reductions in energy consumption, water consumption, and solid waste generation in new development (Objective 2.3 and Policies 2.3.2, 2.3.3, and 2.3.4). Specifically, the Project would achieve this by: (1) complying with Title 24 energy conservation requirements; (2) incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen; (3) complying with applicable waste reduction and recycling requirements; and (4) increasing urban density on an urban infill site within a TPA in proximity to shopping, services, and transit. Lastly, the Project would promote quality residential development and sustainable open space (Policies 2.4.2 and 2.4.3) by providing open space amenities (central courtyard, landscaped terraces, walkways, landscaping, and perimeter trees) for Project residents, exceeding LAMC open space requirements (providing 14,630 square feet of open space as compared to the 7,800 square feet required), and quality urban design and contemporary architecture (e.g., step-backs, landscaped terraces, building articulation and fenestration, a variety of surface materials, etc.) that provides visual interest and both complements and is compatible with the existing surrounding uses. Therefore, the Project would not conflict with the applicable objectives and policies of the Housing Element.

(4) Los Angeles General Plan Conservation Element

As outlined above, 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.

As discussed in the Initial Study, included as Appendix A of this Draft EIR, based on a review of the SurveyLA Historic Resources Survey Report—West Los Angeles Community Plan Area,³⁶ the HistoricPlacesLA database,³⁷ and the Los Angeles ZIMAS database, the existing structures within the Project Site have not been individually listed in or formally determined to be eligible for listing in the National Register or the California Register. In addition, the Project Site has not been designated as a Historic-Cultural Monument and is not located within an existing Historic Preservation Overlay Zone. Furthermore, as analyzed in the Historical Resource Assessment Report, prepared by

³⁶ *City of Los Angeles, SurveyLA, Historic Resources Survey Report—West Los Angeles Community Plan Area, August 2012.*

³⁷ *City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed February 17, 2021.*

Historic Resources Group and provided in Appendix IS-2, of the Initial Study, the existing buildings on the Project Site are not eligible for historic designation in the National Register, the California Register, or as City of Los Angeles Historic-Cultural Monuments. Therefore, as no historic resources are located within the Project Site, removal of the existing buildings within the Project Site and development of the Project would not create a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, the Project would not conflict with the cultural resources policies of the Conservation Element related to historic resources.

With regard to archaeological resources, as discussed in the Initial Study, the results of the archaeological records search conducted for the Project Site and included in Appendix IS-3 of the Initial Study indicate that there are no identified archaeological sites within the Project Site. There is one archaeological site located within a 0.5-mile radius of the Project Site. While the Project would require grading of the Project Site and excavations approximately 30 feet below grade, and previously unknown archaeological resources could be encountered. Given that there are no identified archaeological sites within the Project Site and immediate vicinity, the Project is not anticipated to cause a substantial adverse change in the significance of an archaeological resource. Hence, the Project would not conflict with the cultural resources policies of the Conservation Element related to archaeological resources. Nonetheless, the City generally imposes a condition of approval to address any unanticipated archaeological resources discovered during construction.

With regard to human remains, as discussed in the Initial Study, no known traditional burial sites have been identified on the Project Site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Sections 5097.91 and 5097.98. With the implementation of regulatory requirements, the Project would not disturb any human remains. Hence, the Project would not conflict with cultural resources policies of the Conservation Element related to human remains.

With regard to paleontological resources, as discussed in the Initial Study, a records search conducted for the Project Site included in Appendix IS-4 of the Initial Study indicates there are no previously encountered fossil vertebrate localities located within the Project Site. However, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-1 included in the Initial Study, a qualified paleontologist would be retained in the event paleontological materials are encountered, and grading and excavation activities in the area of the exposed material would be temporarily diverted or redirected to facilitate evaluation and, if necessary, salvage. Hence, the Project would not

conflict with the cultural resources policies of the Conservation Element related to paleontological resources.

(5) West Los Angeles Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Community Plan is discussed in detail in Table 5 of Appendix E of this Draft EIR. As discussed therein, the Project would be generally consistent with the objectives and policies that support the goals of the Community Plan. Specifically, by providing 192 senior housing residential units, the Project would provide for the development of new housing (Objective 1-1), promote housing accessible to more segments of the population including seniors (Objective 1-4), provide for adequate multi-family housing (Policy 1-1.3), promote greater individual choice in housing (Policy 1-4.1), and promote neighborhood preservation and preserve and enhance residential character (Policy 1-1.2 and Objective 1-3). There is a growing need for eldercare facilities in Los Angeles because approximately 10 percent of the City's population is aged 65 years and older,³⁸ and the age distribution is expected to shift, and almost triple by 2035 in the greater Los Angeles area.³⁹ The Project would help meet this need and would result in a net increase in residential units on the Project Site. Furthermore, the Project would: provide a range of eldercare housing types, including independent living, assisted living, and memory care residential units; serve as a transitional use between the existing commercial uses to the north and the existing single-family residential uses to the south; ensure compatibility with the adjacent single-family residential uses by implementing a stepped building design, by integrating parking, recycling areas, trash areas, etc., within the proposed building, and by providing a landscaped open space buffer.

The Project would also reduce vehicle trips and congestion by developing new housing in proximity to adequate services and facilities (Objective 1-2) and locating higher residential densities near commercial centers and major bus routes (Policy 1-2.1) by increasing urban density on an urban infill site in a TPA within proximity to major commercial corridors, services and transit, reducing VMT.⁴⁰

Policy 1.4-2 calls for ensuring that new housing opportunities minimize displacement of residents. The Project would displace the existing 112 units of multi-family housing on

³⁸ According to United States Census 2010 data presented in Chapter 1. *Housing Needs Assessment of the General Plan Housing Element*, page 1-5.

³⁹ Chart 1.2 "Change in Age Distribution: Past and Projected, 2000–2010 & 2010–2035" from *Housing Element*, page 1-5.

⁴⁰ Gibson Transportation Consulting, *Transportation Assessment for Senior Residential Community at the Bellwood Project*, February 2021, revised April 2021. Refer to Appendix H of this Draft EIR.

the Project Site and the associated residents of those units. However, the Project would replace this housing with 192 eldercare housing units and would result in a net increase of 80 residential units (192 proposed units—112 existing units to be removed). In addition, the Applicant would comply with applicable requirements of the RSO and Ellis Act related to relocation. Furthermore, as previously noted, there is increasing need in the City for senior housing. Specifically, approximately 10 percent of the City’s population is aged 65 years and older,⁴¹ and this age distribution is expected to almost triple by 2035 in the greater Los Angeles area.⁴² In recognition of this need, the LAMC was amended by the City Council (Ordinance No. 178,063) to allow eldercare housing within residential and commercial zones, including the R3 and C2 zones (the zoning of the Project Site), subject to the approval of the Zoning Administrator, when the Eldercare Facility does not meet the use, area, or height provisions of the respective zone. Additionally, as discussed in Section IV.G, Population and Housing, of this Draft EIR, it is anticipated that senior residents will vacate their current residential housing to move to the Project Site upon completion of the Project, thereby providing for the availability of other housing elsewhere.

Furthermore, the Project would encourage pedestrian-oriented design in designated areas and in new development (Policy 2.2-1) by: locating parking, trash, recycling, and loading areas within the proposed building rather than next to the public right-of-way, thus minimizing the interface with pedestrians; and by providing on-site pedestrian facilities as well as widened sidewalks and streetscape improvements along the Project’s Bellwood Avenue frontage.

Therefore, based on the above, the Project would generally not conflict with the applicable goals, objectives and policies of the Community Plan.

(ii) West Los Angeles Transportation Improvement and Mitigation Specific Plan

As previously stated, the Project is located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). However, the Project would not be subject to WLA TIMP requirements, including payment of TIA fees or implementation of a TDM program, because the Project is exempt as an eldercare facility project.

⁴¹ According to United States Census 2010 data presented in Chapter 1. Housing Needs Assessment of the General Plan Housing Element, page 1-5.

⁴² Chart 1.2 “Change in Age Distribution: Past and Projected, 2000–2010 & 2010–2035” from Housing Element.

(iii) Los Angeles Municipal Code

As indicated previously, seven of the nine Project Site lots south of Bellwood Avenue are zoned by the LAMC as R3-1-O (Multiple Residential, Height District 1, Oil Drilling),⁴³ while two of the Project Site lots south of Bellwood Avenue and four of the Project Site lots north of Bellwood Avenue are zoned C2-1VL-O (Commercial, Height 1VL, Oil Drilling).⁴⁴ The R3 zone permits a wide variety of residential uses, including group dwellings, multiple dwellings, apartment houses, boarding houses, rooming houses, accessory uses and home occupations, senior independent housing, and assisted living care housing. The C2 zone permits a wide variety of uses, including, but not limited to, eldercare facilities, multiple dwellings, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, sanitariums, clinics, and schools. Height District 1 within the R3 Zone limits building heights to 45 feet and the floor-area ratio (FAR) to 3:1. Height District 1VL within the C2 Zone limits building heights to 45 feet and three stories (except that there is no restriction on the number of stories for buildings used entirely for residential purposes) and the FAR to 1.5:1. The “O” designation indicates the Project Site is located within an Oil Drilling District where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted.

(1) Density

The Project Site currently contains 57,343 square feet of lot area zoned R3 and 36,079 square feet of lot area zoned C2. Following the proposed merger and subdivision, including the vacated and realigned portion of Bellwood Avenue and excluding an anticipated five-foot right-of-way dedication on a portion of Bellwood Avenue, the Project Site would contain a total lot area of 93,422 square feet.⁴⁵ Pursuant to LAMC Section 12.10.C.4, the allowable density for the R3 zoned portion of the Project Site is one dwelling unit per 800 square feet of lot area and/or one guest room per 500 square feet of lot area. As a result, the R3 portion of the Project Site has an allowable density of 71 dwelling units and/or 114 guest rooms. Pursuant to LAMC Section 12.14.C.3, the allowable density for the C2 zoned portion of the Project Site is one dwelling unit per 400 square feet of lot area and/or one guest room per 200 square feet of lot area. As a result, the C2 portion of the Project Site has an allowable density of 90 dwelling units or 180 guest rooms. In total, the Project Site has an allowable density of 161 dwelling units or 294 guest rooms. The Project would provide 71 dwelling units and 121 guest rooms, to be averaged over the

⁴³ *The R3 zoning applies to Lots 29-35 of Block 13 of Tract 7260.*

⁴⁴ *The C2 zoning applies to Lots 36-37 of Block 13 of Tract 7260 and Lots 10-13 of Block 14 of Tract 7260.*

⁴⁵ *The total lot area may vary depending on the ultimate configuration and designation of the realigned portion of Bellwood Avenue.*

Project Site as proposed under the Eldercare Facility Unified Permit pursuant to LAMC Section 14.3.1, which is below the maximum density permitted as outlined above. Therefore, the Project would not provide for residential densities that are greater than that permitted by the existing zoning of the Project Site.

(2) Land Uses, FAR, and Building Heights

Eldercare housing, including independent living, assisted living, and memory care units, is a permitted use in the C2 zone according to the LAMC. Furthermore, while the R3 zone allows for senior independent living and allows for assisted living care housing, it does not permit Alzheimer's/dementia care housing (e.g., memory care housing) or eldercare facilities by right. The Project is proposing building heights up to 70 feet, which would exceed the 45 feet permitted within the R3-1-O and C2-1VL-O zones. In addition, the Project would result in an FAR of up to approximately 2.7:1 to 3.2:1 averaged across the Project Site,⁴⁶ which would exceed the 1.5:1 FAR permitted on the C2 zoned portion of the Project Site and may exceed the 3:1 FAR permitted on the R3 zoned portion of the Project Site. The Project is requesting an Eldercare Facility Unified Permit pursuant to LAMC Section 14.3.1 which would permit the Project, despite the above-specified zoning restrictions, and would also permit access from a less restrictive zone (C2) to more restrictive zone (R3) for accessory uses such as parking. As specified in LAMC Section 14.3.1.A., the purpose of the Eldercare Facility Unified Permit Process is "...to provide development standards..., create a single process for approvals, and facilitate the processing of applications of Eldercare Facilities...(as) these facilities provide much needed services and housing for the growing senior population of the City of Los Angeles." To this end, LAMC Section 14.3.1.B. specifically grants the Zoning Administrator authority to permit an eldercare facility on a lot (or lots) within the R3 and C2 Zones when such a facility "does not meet the use, area, or height provisions of the respective zone contained in [Chapter 1 of the LAMC], or the requirements of any specific plan, supplemental use district, "T" classification, "Q" condition, "D" limitation, or Citywide regulation adopted or imposed by City action."

With approval of the requested Eldercare Facility Unified Permit, the Project would be consistent with the LAMC land use, FAR, and building height restrictions applicable at the Project Site.

⁴⁶ FAR is a calculation of the ratio of building square footage to buildable lot area. As the final buildable lot area may vary based on the ultimate configuration and designation of the realigned portion of Bellwood Avenue, the FAR may range from approximately 2.7:1 to 3.2:1; however, the square footage of the building would not change.

The Project would include the sale and service of a full line of alcoholic beverages for on-site consumption by Project residents and their visitors/guests. Pursuant to LAMC Section 12.24.W.1, the Applicant is requesting a Conditional Use Permit to permit the sale and service of alcoholic beverages to Project residents and their visitors/guests, as an incidental use in and accessory to the operation of the eldercare facility. The Applicant is also requesting a Zone Variance pursuant to LAMC Section 12.27.B for the sale and service of alcoholic beverages to Project residents and their visitors/guests for the portion located in the R3 Zone. With approval of these requests, the Project would not conflict with the LAMC.

(3) Setbacks

The Project requires and would provide the following minimum setbacks: 0-foot front yard (in the C2 Zone along the north property lines), 9-foot side yards (along the east and west property lines) and a 15-foot rear yard (along the south/southernmost property line).⁴⁷ The Project would generally provide greater setbacks than these minimum requirements required by the LAMC.

(4) Parking

Per the automobile parking requirements in LAMC Sections 12.21.A4(d)(5) and 12.21.A4(u) and the bicycle parking requirements in LAMC Section 12.21.A16(a)(1)(i)(b) for eldercare facilities, the Project would be required to provide 81 automobile parking spaces and 72 bicycle parking spaces (24 short-term spaces and 48 long-term spaces). The Project would provide up to 140 automobile parking spaces, which would exceed that required by the LAMC, and 72 bicycle parking spaces, which would meet LAMC requirements.

(5) Open Space

As shown in Figure II-12 in Section II, Project Description, of this Draft EIR, the various components and levels of the proposed building would be integrated by a series of

⁴⁷ *The division of land includes the request to designate yards so that generally the northerly property line is designated as the front yard and the southerly most property line is designated as the rear yard. All other property lines are to be designated as side yards. If the realigned portion of Bellwood Avenue through the Project Site is designated a private street, the front setback of the proposed Project would be within the portion of the Project Site located north of Bellwood Avenue and zoned C2, which does not require a front yard setback. If the realigned portion of Bellwood Avenue through the Project Site is designated a public street, the majority of the building's frontage would be in the C2 zone and a limited portion of the building's frontage would be in the R3 zone. If all of the building frontage along Bellwood Avenue is considered front yard, a modification would be requested as part of the eldercare permit for the Project for a zero-foot setback in the limited portion of the building frontage that would be in the R3 zone consistent with the rest of the building's frontage in the C2 zone.*

landscaped courtyards and terraces provided at every floor of the building. Overall, the Project would provide 14,630 square feet of open space, which would exceed the open space required for the Project by the LAMC of 7,800 square feet.

(6) Conclusion

Based on the above and with approval of the requested discretionary actions outlined in Section II, Project Description, of this Draft EIR (including, but not limited to, the requested Eldercare Facility Unified Permit, Site Plan Review and Vesting Tentative Tract Map), the Project would be generally consistent with the applicable zoning provisions of the LAMC.

(iv) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not strict regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all are appropriate in every case. As evaluated in Section IV.A, Aesthetics, of this Draft EIR, the Project would not conflict with the Citywide Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect. Refer to Section IV.A, Aesthetics, of this Draft EIR, for an analysis of the Project's consistency with the Citywide Design Guidelines.

(c) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would not conflict with goals, policies, or objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with or impede the General Plan, Community Plan, or the whole of the relevant environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant.

(2) Mitigation Measures

Project-level impacts related to conflicts with applicable land use plans would be less than significant. Therefore, 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 are required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

The six related projects include the Westfield Century City New Century City Plan Project (residential and commercial), Century City Center (office), Century Plaza (condominiums, office, retail, and other), Fox Studio Master Plan (studio uses), and two apartment projects. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Therefore, the Project and the related projects would not result in significant cumulative land use impacts. In addition, as the Project would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, cumulative impacts with regard to conflicts with land use plans would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to land use and planning would be less than significant. Thus, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

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