

## **IV. Environmental Impact Analysis**

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### **F. 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 physically divide an established community and whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. 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 Draft EIR. Specifically, Section IV.A, Air Quality, 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
- Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Wilshire Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

## (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 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 greenhouse gas (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 (MPO) 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.

## (2) Regional

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

SCAG is the federally designated Metropolitan Planning Organization (MPO) for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

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 RTP, 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 new 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-served 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.

On September 3, 2020, SCAG’s Regional Council adopted its 2020–2045 RTP/SCS, Connect SoCal. Connect SoCal’s core vision is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to reach our region’s GHG reduction goals. As was the case under the prior RTP/SCS, the Project Site is located within an HQTA as designated by the 2020–2045 RTP/SCS.

The Notice of Preparation for the Project was circulated on August 9, 2019, prior to the adoption of the 2020–2045 RTP/SCS. Therefore, the Project’s consistency with the applicable goals of both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS are discussed in the impact analysis below under Threshold (b). A detailed list of the goals of the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS applicable to the Project Site are included in Tables 5 and 6, respectively, of Appendix N to this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal.

### (3) Local

#### *(a) City of Los Angeles General Plan*

The City of Los Angeles General Plan (General Plan),<sup>1</sup> originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future

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<sup>1</sup> *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed March 1, 2021.*

development of the City, while integrating a range of state-mandated elements,<sup>2</sup> 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) Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework 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 General Plan Framework provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(1) Land Use Chapter

The General Plan Framework 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 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.

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<sup>2</sup> *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).*

## (2) Housing Chapter

The overarching goal of the General Plan Framework Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The General Plan Framework 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.

## (3) Urban Form and Neighborhood Design Chapter

The General Plan Framework 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 General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.<sup>3</sup> The General Plan Framework 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.

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<sup>3</sup> *City of Los Angeles General Plan Framework, page 5-1, et. seq.*

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#### (4) Open Space and Conservation Chapter

The General Plan Framework 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 imperative 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.

#### (5) Economic Development Chapter

The General Plan Framework Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The chapter also establishes mutual development objectives for land use and economic development. This Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The 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.

#### (6) Transportation Chapter

The General Plan Framework 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 Framework chapters of the General Plan Framework regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the General Plan Framework is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

#### (7) Infrastructure and Public Services Chapter

The General Plan Framework 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.

*(ii) Transportation Element (Mobility Plan 2035)*

The 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:<sup>4</sup>

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

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<sup>4</sup> *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.*

*(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 Housing Element 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:

- 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.

*(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.<sup>5</sup> Through a new focus on public health from the perspective of the built

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<sup>5</sup> *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015.*

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 the following goals:

- Los Angeles, A Leader in Health and Equity;
- A City Built for Health;
- Bountiful Parks and Open Spaces;
- Food that Nourishes the Body, Soul, and Environment;
- An Environment Where Life Thrives;
- Lifelong Opportunities for Learning and Prosperity; and
- Safe and Just Neighborhoods.

Included in this General Plan Element are policies pertaining to the arrangement of land uses within the City and building design procedures.<sup>6</sup> As such, these policies address characteristics of the physical environment that contribute to public health. The Health and Wellness Element does not include policies or objectives adopted for the purpose of mitigating an environmental effect and therefore is not analyzed below.

*(vi) Wilshire Community Plan*

The Project Site is located within the Wilshire Community Plan area. Adopted September 2001, the Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the General Plan Framework Element. The Community Plan identifies and provides for economic opportunities and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Community Plan Area.

The Wilshire Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:

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<sup>6</sup> *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015. Policy 2.2, Healthy building design and construction, p. 42; and Policy 5.7, Land use planning for public health and GHG emission reduction, p. 94.*

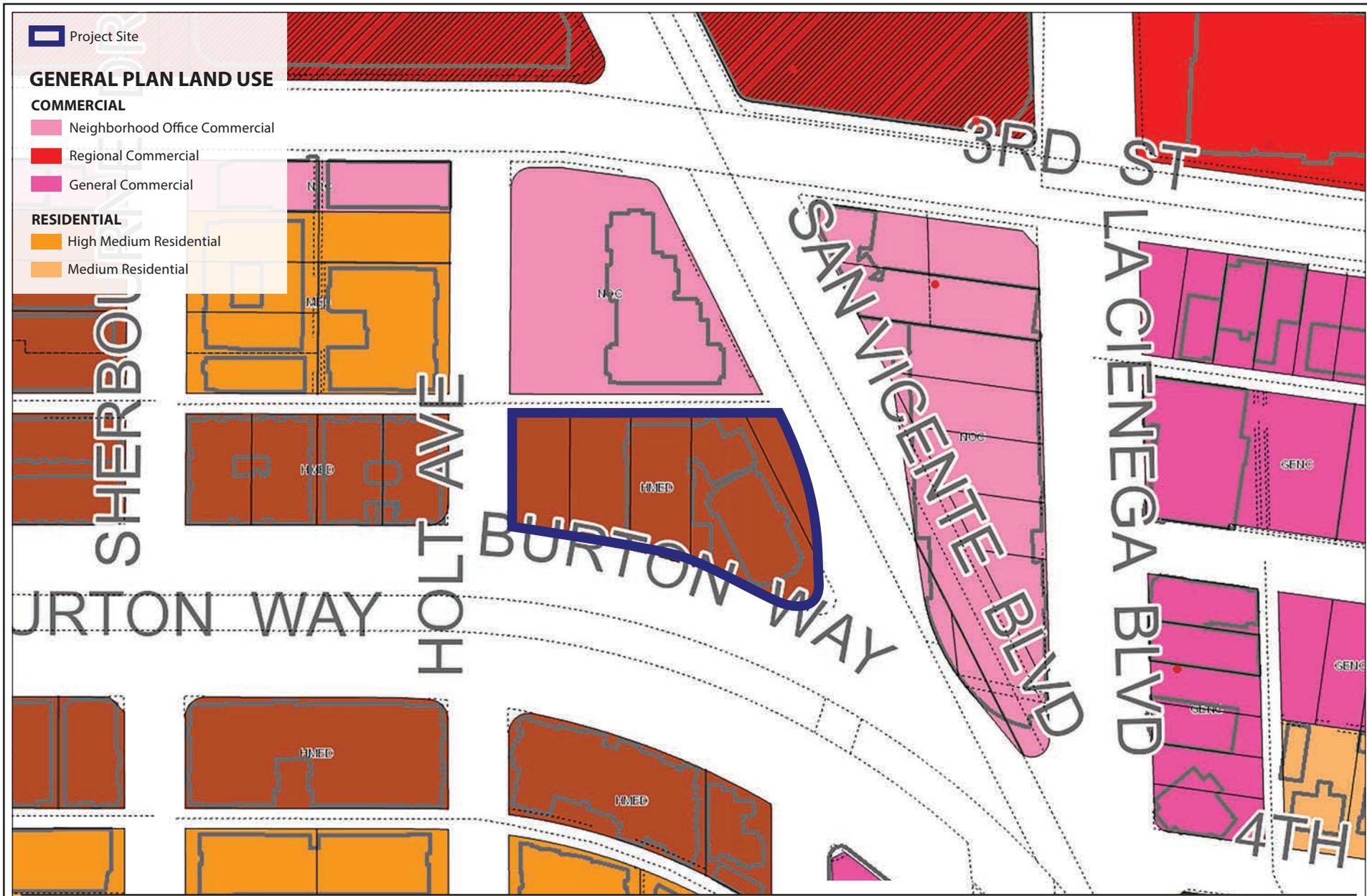
- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for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

As indicated in Figure IV.F-1 on page IV.F-11, the Community Plan's land use designation for the Project Site is Multiple Family Residential.

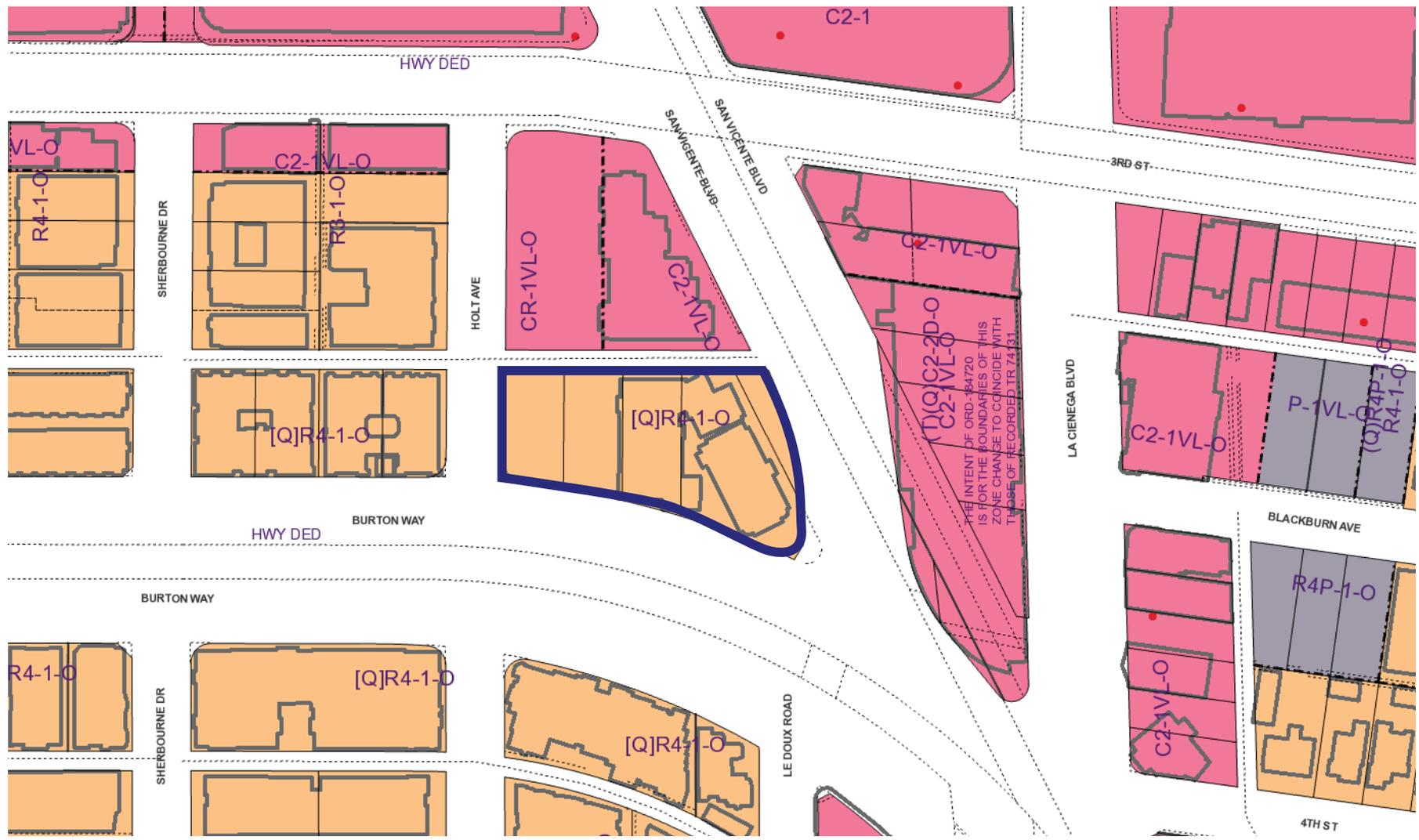
*(b) Los Angeles Municipal Code*

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 indicated in Figure IV.F-2 on page IV.F-12, the Project Site is designated by the LAMC as [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling). The "Q" prefix indicates restrictions on the property as a result of a zone change to ensure compatibility with the surrounding properties. The "Q" Conditions applicable to the Project Site, pursuant to Ordinance No. 167711, adopted in 1992, include standards and limitations relating to setbacks, residential parking regulations, parking garage restrictions, landscaping and open space. The R4 designation indicates that the Project is located within a Multiple Dwelling Zone, which permits a wide variety of uses, including the following: residential uses; churches; child care facilities or nursery schools; hotels, motels, and apartment hotels; fraternity or sorority houses and dormitories; schools or educational institutions; museums or libraries; accessory uses and home occupations; and retirement hotels.

The "1" in the zoning designation means that the Project Site is located in Height District No. 1. Pursuant to LAMC Section 12.21.1 A, when a site that has a zoning designation of R4 is also located in Height District No. 1, the maximum floor area ratio



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



**GENERALIZED ZONING**

- C2, CR
- P, R4P
- Project Site
- R3

**Figure IV.F-2**  
Zoning Designations on the Project Site

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

(FAR) for that site is 3:1. Therefore, the maximum FAR for the Project Site is 3:1, provided that this maximum FAR may be increased through the approval of a density bonus pursuant to LAMC Section 12.22 A.25. However, neither the designation of the Project Site as Height District No. 1 nor any other zoning provision that applies to the Project Site restricts the height or number of stories of any building on the Project Site. 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.

The front yard setback for the Project along Burton Way is 5 feet. This is because, pursuant to LAMC Section 12.22 C.1, where a Building Line has been established by ordinance, the space between such Building Line and the front lot line may be used as the front yard, in lieu of the front yard otherwise required. The front lot line for the Project Site is adjacent to Burton Way, and Ordinance No. 77072 (Building Line) established a Building Line that is 5 feet from Burton Way. Therefore, pursuant to LAMC Section 12.22 C.1, the required front yard setback is 5 feet.

In addition, as noted previously, the Project Site is located within a TPA, as defined by ZI File No. 2452.7

*(c) 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.

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<sup>7</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 333 S. San Vicente Blvd.*, <http://zimas.lacity.org/>, accessed April 12, 2021.

## **b. Existing Conditions**

### **(1) Project Site**

The 42,285-square-foot (0.97-acre) Project Site is located at 331–333 S. San Vicente Boulevard and 8531–8555 W. Burton Way. The Project Site is bounded by an alley to the north, Burton Way to the south, San Vicente Boulevard to the east, and Holt Avenue to the west. The Project Site is currently developed with the following improvements: a one-story, 6,848-square-foot cathedral; three ancillary church buildings with a total of 12,370 square feet of floor area, including a two-story, 2,520-square-foot rectory, a one-story, 5,426-square-foot social hall, and a three-story, 4,424-square-foot building with offices and meeting rooms. The cathedral is situated on the eastern portion of the Project Site at the intersection of San Vicente Boulevard and Burton Way. The ancillary church buildings are located to the north and west of the cathedral.

The Project Site also includes surface parking lot located on the western portion of the Project Site. Vehicular access to the Project Site is available via two driveways along Burton Way and at various points along the publicly-accessible alley that abuts the Project Site to the north. Existing landscaping within the Project Site includes several trees and shrubs.

As previously discussed, the Project Site is currently designated as Multiple Family Residential under the Community Plan and is zoned [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling). The Project Site is also located in a TPA pursuant to PRC Section 21099 and HQTAs as designated by SCAG.

Our Lady of Mt. Lebanon currently holds masses at the cathedral on Monday through Friday at 8:00 A.M., on Saturday at 8:00 A.M., and on Sunday at 9:00 A.M. and 11:30 A.M. The church offices house a three-person staff and are open Monday through Friday from 8:00 A.M. to 5:00 P.M. The church also holds meetings and classes in its meeting rooms and at the rectory approximately one to three times a week on Monday through Friday from 7:00 P.M. to 11:00 P.M. In addition, the church currently hosts 25 to 30 events each year, primarily in the social hall (which has a maximum capacity of approximately 200 people) for weddings, funerals and other church functions. Most of these events take place in the evening, but have occurred from 11:00 A.M. to 1:00 A.M. Currently, off-site parking is required from time to time for special masses and social hall events.

### **(2) Surrounding Uses**

The Project Site is located along the western edge of the Beverly Grove District, which is a neighborhood in the Mid-City West area of the City. This area surrounding the

Project Site is developed with a mix of commercial and residential uses. Land uses located adjacent to the Project Site include an 11-story residential condominium building to the north (across the alley), a three-story retail building and parking structure to the east across San Vicente Boulevard, two- and five-story, multi-family residential buildings to the south across Burton Way, and a five-story, multi-family residential building to the west across Holt Avenue. Other nearby uses include the Beverly Center to the north and additional residential and commercial uses. The uses surrounding the Project Site have various land use and zoning designations, including General Commercial, Neighborhood Office Commercial, and Medium and High Medium Residential with zoning designations of C2-1VL-O, CR-1VL-O, (T)(Q)C2-2D-O, R3-1-O, and [Q]R4-1-O.

### 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 land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate land use:

##### (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.

## (2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

As previously discussed, the Project's potential impacts regarding physically dividing an established community were fully evaluated in the Initial Study prepared for the Project, included in Appendix A to this Draft EIR, and impacts were found to be less than significant. As such, Threshold (a) is not considered herein.

### **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 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:

*"...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. Office of Planning and Research (OPR), State of California General Plan Guidelines (2017). 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. In other words, 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.

### **c. Project Design Features**

No specific project design features beyond the project improvements discussed in Section II, Project Description, of this Draft EIR, are proposed with regards 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 prepared for this Project and included as Appendix A to this Draft EIR, the Project Site is located along the San Vicente Boulevard corridor and is bounded by an alley to the north, Burton Way to the south, San Vicente Boulevard to the east, and Holt Avenue to the west. The Project Site is located within an urbanized area characterized by a mixture of low-, mid- and high-rise buildings occupied primarily by a mix of residential and commercial uses. The Project Site is currently developed with the following improvements: a one-story, 6,848-square-foot cathedral; three ancillary church buildings with a total of 12,370 square feet of floor area, including a two-story, 2,520-square-foot rectory, a one-story, 5,426-square-foot social hall, and a three-story, 4,424-square-foot building with offices and meeting rooms; and a surface parking lot. The Project includes the development of new multi-family residential uses, and the rehabilitation and limited alteration of the existing Our Lady of Mt. Lebanon-St. Peter Maronite Catholic Cathedral. These uses are consistent with the adjacent uses in the community. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project does not include the vacation of any surrounding streets adjacent to the Project Site. Furthermore, the Project does not include the development of a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community, and the impact with respect to Threshold (a) would be less than significant. No further analysis is required.**

#### ***Threshold (b): Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

## (1) Impact Analysis

### *(a) 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 the requirements and policies of the General Plan, including the Framework Element, Housing Element, Conservation Element, and Mobility Plan 2035; the Community Plan, LAMC, Citywide Design Guidelines, and the City's Walkability Checklist that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

#### *(i) Los Angeles General Plan*

##### (1) Los Angeles General Plan Framework Element

The Project would not cause a significant environmental impact due to a conflict with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect as discussed in detail in Table 1 of Appendix N to this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

##### (a) Land Use Chapter

The Project would not cause a significant environmental impact due to a conflict with 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 Site's proximity to public transit, including Metro, LADOT DASH, and West Hollywood CityLine bus lines, and to surrounding commercial uses and services would promote an improved quality of life by facilitating a reduction of vehicle trips and vehicle miles traveled (VMT) (Objective 3.2). In particular, public transit options within close proximity to the Project Site include: a bus stop approximately 720 feet from the Project Site at the intersection of Third Street and La Cienega Boulevard, which provides service on Metro Rapid Line 705, and Metro lines 105, 16, 316, 17, and 218; a bus stop approximately 450 feet from the Project Site at the intersection of Third Street and San Vicente Boulevard, which includes service for Metro lines 30 and 330; a bus stop approximately 250 feet from the Project Site at the intersection of Third Street and Holt Avenue which provides service on LADOT's DASH Fairfax; and a bus stop approximately 1,500 feet from the Project Site on Gracie Allan Drive, approximately half-way between South Sherbourne Drive and South George Burns Road, with free local bus service on the City of West Hollywood's Cityline. The Project would also support the City's Policy 3.1.2 to allow for the provision of public infrastructure and services to support the projected needs of the City's population and

businesses. Specifically, as detailed in Table 1 of Appendix N to this Draft EIR, the Project would be accommodated within the City's existing infrastructure and services and would not require the construction of new infrastructure or services to meet the Project's needs. In addition, the Project would support the City's Policy 3.7.1 to accommodate the development of multi-family residential units in areas designated in the community plans through the development of new multi-family residential units within a site permitted for such uses. Furthermore, the Project would provide for the development of land use patterns that emphasize pedestrian/bicycle access and use (Policy 3.2.3) by locating the proposed uses within an area in close proximity to retail, restaurants, and shopping centers, such as the Beverly Grove Shopping District located north of the Project Site along La Cienega Boulevard, to which residents of the Project would be able to walk or bike. Other shopping destinations in the vicinity include Beverly Center, the West 3rd Shopping District, Robertson shopping district, and West Hollywood Design District. Therefore, as provided in detail in Appendix N to this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

#### (b) Housing Chapter

The Project would support the City's objective (Objective 4.1) 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 by including a variety of new multi-family residential units, including 13 studio units, 80 one-bedroom units, and 60 two-bedroom units, 17 of which are affordable housing units. The Project would also support the City's objective (Objective 4.2) to encourage the location of new multi-family housing to occur in proximity to transit by locating a mix of multi-family housing types in an area well-served by public transit. In particular, public transit options within close proximity to the Project Site include: a bus stop approximately 720 feet from the Project Site at the intersection of Third Street and La Cienega Boulevard, which provides service on Metro Rapid Line 705, and Metro lines 105, 16, 316, 17, and 218; a bus stop approximately 450 feet from the Project Site at the intersection of Third Street and San Vicente Boulevard, which includes service for Metro lines 30 and 330; a bus stop approximately 250 feet from the Project Site at the intersection of Third Street and Holt Avenue which provides service on LADOT's DASH Fairfax; and a bus stop approximately 1,500 feet from the Project Site on Gracie Allan Drive, approximately half-way between South Sherbourne Drive and South George Burns Road, with free local bus service on the City of West Hollywood's Cityline. As discussed in detail in Table 1 of Appendix N to this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Housing Chapter. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of 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 by enhancing the livability of the Project Site and neighborhood along a corridor served by transit (Objective 5.5). Specifically, the Project would replace a surface parking lot with a pedestrian-oriented building, integrating extensive landscaping, including new and existing street trees along all street frontages. By removing all existing automobile driveways along Burton Way and Holt Avenue (automobile access will be restricted to the shared alley behind the Project Site), the Project would enhance the pedestrian environment and reduce VMT by reducing interactions between vehicles and pedestrians. In addition to rehabilitating the existing cathedral building, the Project includes the replacement and enhancement of the other existing church facilities on the Project Site, including a new multi-purpose room for church events and limited community events, meeting rooms and offices that will be located adjacent to the rehabilitated cathedral. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Urban Form and Neighborhood Design Chapter. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of 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 by providing a variety of open space areas within the Project Site. In accordance with Policies 6.4.7 and 6.4.8, the Project would provide 16,800 square feet of open space per LAMC requirements, consisting of 9,200 square feet of common open space and 7,600 square feet of private open space. Specifically, Level 4 of the building includes a 676-square-foot indoor fitness room and 1,266-square-foot recreation room, a 5,242-square-foot outdoor recreation deck and a 2,016-square-foot pool deck. Outdoor open space amenities also include barbecue stations, a spa, pool, firepit areas, built-in banquet seating, and informal seating. Private open space amenities include four patios for the ground floor residences and 144 balconies throughout the residences on all other levels of the residential building. In addition, the Project includes extensive landscaping, some of which would serve as screening along the perimeter of the Project Site. The proposed open space would be lit adequately and maintained by on-site staff and monitored by a 24-hour security camera network. As such, the Project would support the City's objective to ensure that the open space is managed to minimize environmental risks to the public (Objective 6.3). Therefore, as provided in Table 1 of Appendix N to this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in the General Plan Framework's Open Space and Conservation Chapter. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Framework Element's Open Space and Conservation Chapter.

### (e) Economic Development Chapter

As discussed in Table 1 of Appendix N to this Draft EIR, the Project would encourage the inclusion of community-service uses along mixed-use corridors. In particular, the Project Site is located along a mixed-use corridor and would enhance the existing community-serving uses on the Project Site as part of the Project. Similarly, the Project would concentrate residential uses along a mixed-use corridor well-served by transit, in support of the City's Policy 7.9.2. Specifically, the Project would include 153 multi-family housing units and the Project Site is located within an area that is designated as a TPA and HQTAs because public transit service in the area is provided by numerous local and regional bus lines. Thus, the Project would not conflict with the applicable objective and policies set forth in the Framework Element's Economic Development Chapter. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Framework Element's Economic Development Chapter.

### (f) Infrastructure and Public Services Chapter

The Project would be located in an area served by existing infrastructure and public services such as wastewater conveyance systems, water facilities, and recycling services. The Project would support the City's policy and objective to reduce the total amount of flow entering the stormwater system, as well as pursue effective and efficient approaches to protecting water quality by implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include Best Management Practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. The Project would also comply with the County's Low Impact Development (LID) Standards Manual and the City's LID Ordinance, which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Furthermore, the Project would be within the LADWP current and projected available water supplies for normal, single-dry, and multiple-dry years and would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. In addition, the existing sewer lines would have adequate capacity to accommodate the Project and the Hyperion Water Reclamation Plant has adequate capacity to serve the Project. The Project would not conflict with applicable goals, objectives, and policies of the Framework Element's Infrastructure and Public Services chapter adopted for the purpose of avoiding or mitigating an environmental effect. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Framework Element's Infrastructure and Public Services Chapter.

### (2) Mobility Plan 2035

As discussed in detail in Table 2 of Appendix N to this Draft EIR, the Project would not be in conflict with the relevant policies of Mobility Plan 2035. In particular, the Project

would support the City's Policy 1.6 of Mobility Plan 2035 to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan and work site traffic control plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would also support the City's Policy 2.3 to recognize walking as a component of every trip and ensure high quality pedestrian access to provide a safe and comfortable walking environment by promoting walkability through Project design and pedestrian and streetscape improvements, which would reduce VMT. In addition, the Project would promote the City's Policy 3.1 to recognize all modes of travel by providing adequate and enhanced pedestrian and vehicular access and providing bicycle facilities. The Project would further support the City's Policy 3.3 to promote equitable land use decisions that result in fewer vehicle trips by providing a new development consisting of a mix of uses in proximity to jobs, destinations, and other neighborhood services in an area that is well-served by transit. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project would provide all residents, guests, employees, and patrons convenient access to transit services in support of the City's Policy 3.4. Therefore, as detailed in Table 2 of Appendix N to this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies set forth in Mobility Plan 2035. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of Mobility Plan 2035.

### (3) Los Angeles General Plan Housing Element

The Project would not conflict with the applicable policies set forth in the Housing Element that were adopted for the purpose of avoiding or mitigating an environmental effect as detailed in Table 3 of Appendix N to this Draft EIR. As discussed therein, the Project would support the City's policy to facilitate new construction of different housing types through the development of up to 153 residential units, including up to 17 restricted affordable housing units. In addition, the Project would support the City's Objective 2.2 to promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit as well as the City's Objective 2.3 to promote sustainable buildings. The Project is designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby reduce associated GHG and help minimize the impact on natural resources and infrastructure. The Project would incorporate sustainable design features, including, but not limited to electric vehicle charging stations; material recycling stations; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design. Therefore, the Project would not conflict with the applicable goals,

objectives, and policies set forth in the Housing Element. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Housing Element.

#### (4) Los Angeles General Plan Conservation Element

As discussed above, Section 3 of the Conservation Element established an objective to protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes and a corresponding policy to continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification activities. As discussed in the Initial Study prepared for the Project and included as Appendix A to this Draft EIR, the Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Additionally, records searches conducted by the South Central Coastal Information Center and Los Angeles Natural History Museum did not identify any archaeological or paleontological resources within the Project Site. In the event of an inadvertent discovery, Project construction would comply with applicable City and state regulations pertaining to archaeological and paleontological resources. Therefore, the Project would not conflict with the archaeological and paleontological resources objective and policy in the Conservation Element.

As also discussed above, Section 5 of the Conservation Element established 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 Section IV.B, Cultural Resources, of this Draft EIR, the Project Site is not listed in the National Register or California Register and was not designated as an Historic-Cultural Monument (HCM). However, as determined in the Historical Report prepared for the Project, included as Appendix C to this Draft EIR, the cathedral appears to be individually eligible for local listing as a Los Angeles HCM. As part of the Project, the cathedral would be deconstructed, temporarily stored, reassembled, and rehabilitated. Although the deconstruction and reassembly of the cathedral would impact the building's integrity of design, workmanship, materials, and feeling, these aspects of integrity have already been diminished by previous alterations. As such, the Project would not further materially impair the cathedral's integrity in a way that would make it no longer eligible for listing as a Los Angeles HCM. Therefore, the Project would not conflict with the historic preservation objective and corresponding policy in the Conservation Element.

As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Conservation Element.

#### (5) Wilshire 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 4 of Appendix N to this Draft EIR. As discussed therein, the Project would not conflict with the applicable objectives and policies that support the goals of the Community Plan. Specifically, the Project would not conflict with Objective 1-1 of the Community Plan to provide for the development of new housing to meet the diverse economic and physical needs of the City. As previously discussed, the Project would involve the development of new housing, including a variety of unit types and would support the City's objective to develop new housing. The Project also would not conflict with Objective 1-2 to locate new housing in a manner which reduces vehicular trips as the Project would provide the opportunity for people to live, work, and recreate in an area well-served by public transportation, which would reduce VMT. The Project would also increase density on the Project Site in accordance with Policy 1-2.1 and would support historic preservation goals in neighborhoods in accordance with Policy 1-3.2 by reassembling and rehabilitating the existing cathedral. Additionally, the Project would provide a variety of on-site open space meeting LAMC requirements and would not conflict with Goal 5 to provide sufficient open space in balance with development. Furthermore, the Project would support the City's Goal 11 to encourage a system of safe, efficient, and attractive bicycle and pedestrian facilities through the provision of bicycle parking areas, pedestrian access along the perimeter of the Project Site, and pedestrian access to the parking structure from the alley. Overall, the Project would not conflict with the applicable goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the Community Plan.

#### *(ii) Los Angeles Municipal Code*

As previously discussed, the Project Site is designated by the LAMC as High Medium Residential and zoned [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling). As previously described, the Project Site is also located within a TPA, as defined by ZI File No. 2452. Additionally, the "Q" Qualified Conditions established through Ordinance No. 167711 (approved April 13, 1992) changed the zoning for the area roughly bounded by Oakhurst Drive, San Vicente Boulevard, Alden Drive, and Third Street and Burton Way to [Q]R4-1-O. The "Q" Conditions include height restrictions (not applicable to the Project Site), side yard setbacks, residential parking regulations, parking garage restrictions, landscaping, open space, and building articulations. The "Q" Conditions do not restrict the uses permitted within the R4 zone. The Multiple Dwelling Zone permits a wide array of land uses, including residential uses; churches; child care facilities or nursery schools;

hotels, motels, and apartment hotels; fraternity or sorority houses and dormitories; schools or educational institutions; museums or libraries; accessory uses and home occupations; and retirement hotels. As such, the uses proposed by the Project are permitted by the zoning, including the development of 153 residential apartment units (including 17 units for Very Low Income households), the approximately 7,790 square-foot rehabilitated cathedral, and approximately 23,649 square feet of new ancillary church uses, including 3,400 square feet of church offices, 7,649 square feet of meeting rooms for use by the church, and a new 12,600-square-foot multi-purpose room.

As discussed in Section II, Project Description, of this Draft EIR, the proposed buildings would be constructed above a five-level subterranean parking structure. The tallest building would be the residential building, with 19 stories and a height of 225 feet. The combination of the R4 zoning designation of the Project Site and its further designation as Height District No. 1, limits FAR to 3:1 (subject to increase with the approval of a density bonus), but they do not limit the height or number of stories of project buildings. Therefore, the height and number of stories of the residential building (and the other project buildings, which are substantially lower in height) would not conflict with the LAMC.

LAMC Section 12.11.C.4 establishes a base density in the R4 zone of 400 square feet per dwelling unit, which allows 113 base dwelling units on the Project Site. By allocating 15 percent (17 units) of 113 base dwelling units for Very Low Income households, the Applicant is entitled to a 35-percent density bonus, as well as three on-menu incentives. One of the requested on-menu incentives is to include the area of land required to be dedicated for street and alley purposes as lot area for purposes of calculating the maximum density permitted by the underlying R4 zone, pursuant to LAMC Section 12.22.A.25(f)(7). With the application of this on-menu incentive, the base density permitted by the underlying zone would be calculated by dividing the entire lot area, including one-half of the abutting alley (44,941 square feet) by 400 square feet of lot area per dwelling unit, for a total base density of 113 dwelling units. A 35-percent density bonus would allow 40 additional units, for a total of 153 dwelling units. With the approval of this request, the Project would not conflict with the LAMC.

The Project has a total FAR of approximately 4.99:1, which would exceed the maximum permitted FAR of 3:1 (108,408 square feet). However, as previously discussed in Section II, Project Description, of this Draft EIR, the Applicant requests a 35-percent FAR bonus pursuant to LAMC Section 12.22.A.25, Density Bonus, allowing an increase in FAR from 3:1 to 4.05:1 (146,350 square feet). The Applicant is also requesting an off-menu waiver of development standards to allow an increase of FAR from 4.05:1 to 4.99:1, resulting in 180,080 square feet of total floor area. With the approval of this request, the Project would not conflict with the LAMC.

The R4 Zone normally requires a 15-foot front yard setback along the Burton Way frontage. However, a 5-foot building line established in 1936 by Ordinance No. 77072 supersedes the R4 setback requirement (LAMC Section 12.22.C.1). Therefore, only the 5-foot building line (setback) is required for the Burton Way front yard. The Project includes a 5-foot setback along this frontage, consistent with the building line requirement. The Project also includes a fence approximately 8 feet in height to secure the church courtyard area located along the W. Burton Way frontage, which is 2 feet above the natural grade of the Project Site. The fence is located within the 5-foot front yard setback to provide security for the courtyard area and protect users from falling due to the grade differential. Ordinance No. 77072 prohibits non-building structures and improvements within 5 feet of the property line on W. Burton Way, including hardscape, stairs, walkways, gates, fences, and guard railing that exceed 42 inches in height. The Applicant, however, is requesting: (1) an off-menu waiver of development standards to allow non-building structures and improvements, including without limitation hardscape, stairs, walkways, gates, and fences and guard railing that exceeds 42 inches in height within 5 feet from the property line on W. Burton Way; and (2) a Zoning Administrator's Determination to allow a fence up to 8 feet in height within the front yard setback area located along the W. Burton Way frontage. With the approval of these requests, the Project would not conflict with Ordinance No. 77072 or the LAMC.

Pursuant to Ordinance No. 167711, a minimum 8-foot side yard for all developments that exceed 80 feet of street frontage is required. Pursuant to LAMC Section 12.11 C.2 and C.3, a 16-foot setback along the side yards along Holt Avenue and San Vicente Boulevard, and a 20-foot rear setback are required, respectively, for a 19-story building. The Applicant has requested: (1) an on-menu incentive to permit a 12-foot 10-inch westerly side-yard setback, in lieu of the otherwise required 16 feet along Holt Avenue per the LAMC; and (2) an off-menu incentive/waiver of development standards to allow a 0- to 16-foot variable width easterly side-yard setback, in lieu of the otherwise required 16 feet along San Vicente Boulevard per the LAMC, in order to accommodate the cathedral building in its approximate existing location following its reassembly, rehabilitation and modification. The Project provides a 20-foot rear-yard setback that includes one-half the width of the adjacent alley (10 feet), as permitted by LAMC Section 12.22 C.10. As such, the Applicant is not requesting an incentive to reduce the rear setback. With the on-menu and off-menu waiver of development standards, the Project would not conflict with the LAMC.

Pursuant to LAMC Section 12.21 G, based on the number and type of units proposed, the Project is required to provide 16,800 square feet of usable open space. The Project includes 16,800 square feet of open space, including approximately 9,200 square feet of common open space and 7,600 square feet of private open space, in accordance with LAMC requirements. "Q" Condition No. 6.B requires a minimum of 50 percent of the common usable open space areas be planted with ground cover, shrubs or trees and

include at least one 24-inch box tree for every three dwelling units (51 trees required for 153 dwelling units). The Applicant is requesting an off-menu incentive to waive development standard to allow a reduction of the common usable open space landscaping requirements from 50 percent to 23 percent on the Level 4 Recreation Deck Area and 10 percent on the Level 4 Pool Deck Area. Furthermore, it is not feasible to provide all 51 trees within the common usable open space areas on Level 4 Recreation Deck Area and Level 4 Pool Deck Area. As such, the Applicant is requesting an off-menu waiver of development standards to allow 37 trees be planted within the common usable open space areas, in lieu of the otherwise required 51 trees in the common usable open space area, and the remaining balance of trees, or 14 trees, be planted outside of the common usable open space areas throughout the entire property (including 10 street trees). With these requests, the Project would not conflict with the applicable "Q" Conditions or the LAMC.

As discussed in Section IV.I, Transportation, of this Draft EIR, based on the parking requirements set forth in LAMC Sections 12.21 A.4 and 12.22 A.25, the Project would require a total of 314 automobile parking spaces, in conjunction with Parking Option 1. The Project would include a total of approximately 397 automobile parking spaces. Therefore, the Project would include sufficient parking to comply with the minimum applicable parking requirements of the LAMC. In addition, in accordance with LAMC Section 12.21 A.16(a), the Project includes 124 bicycle parking spaces.

Based on the above, with approval of the requested discretionary actions outlined in Section II, Project Description, of this Draft EIR, the Project would be not conflict with applicable provisions of the LAMC. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable objectives and policies of the LAMC.

### *(iii) Citywide Design Guidelines*

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be applicable in every case. The Project would not conflict with the applicable guidelines adopted for the purpose of avoiding or mitigating an environmental effect, as discussed below. As such, the Project would not cause a significant environmental impact due to a conflict with the applicable Citywide Design Guidelines.

## **Pedestrian-First Design**

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

The Project would provide a variety of pedestrian connections within the Project Site for the two separate uses (residential and church) proposed. The Project would also connect to the existing sidewalk network surrounding the Project Site. Lastly, as discussed further below under Guideline 2, the Project would remove the existing automobile driveways along Burton Way and Holt Avenue resulting in fewer interactions between vehicles and pedestrians, thereby enhancing pedestrian activity along surrounding sidewalks. In addition, the Project would provide lighting of buildings and walkways to provide for pedestrian safety and to clearly identify a secure route between parking areas and building entrances. Thus, the Project would not conflict with Guideline 1.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

The Project would remove all existing automobile driveways along Burton Way and Holt Avenue. Vehicular access to the Project Site would be restricted to a driveway along the publicly-accessible alley that abuts the Project Site to the north. All of the parking spaces for the Project would be located within the subterranean parking structure, minimizing the appearance of parking areas on the Project Site. Therefore, the Project would not conflict with 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 by incorporating variations in building planes and other architectural features to reduce the effect of massing and provide a pedestrian scale adjacent to public streets. Additionally, as noted above, the Project would remove existing driveways on Burton Way and Holt Avenue. Therefore, the Project would not conflict with Guideline 3.

### **Climate-Adapted Design**

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

As described in the Project's Initial Study, the Project Site is fully developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. Landscaping within the Project Site is limited, consisting of five non-protected trees, shrubs, and grass areas. Seven street trees are also located adjacent to the Project Site. The five trees within the Project Site and one of the seven street trees would be removed as part of the Project but would be replaced in accordance with City requirements. In addition, the Project includes the planting or retention of 53 trees throughout the Project Site in accordance with Ordinance No. 167711, "Q" Conditions 6.B and 7. Therefore, the Project would not conflict with Guideline 8.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would include the installation of photovoltaic cells, sun shading devices, and energy-efficient wall insulation and glazing units which would lower energy demand. Therefore, the Project would not conflict with Guideline 9.

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

As discussed in the Project's Initial Study, the Project would include the installation of capture and use and/or biofiltration systems to manage stormwater in accordance with the City's Low Impact Development Manual. The Project would also include the planting of new trees and extensive landscaping as described above. Therefore, the Project would not conflict with Guideline 10.

*(b) Consistency with Regional Plans*

*(i) 2016–2040 RTP/SCS*

The Project's general consistency with the applicable goals set forth in the 2016–2040 RTP/SCS is analyzed in Table 5 of Appendix N to this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTAs and City-designated TPAs, as defined in ZI File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking.

*(ii) 2020–2045 RTP/SCS*

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 6 of Appendix N to this Draft EIR. As detailed therein, the Project would be generally consistent 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, as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTAs and City-designated TPA, as defined in ZI File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project also includes adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking.

*(c) Conclusion Regarding Impacts Relative to Land Use Consistency*

**Based on the analysis provided above, the Project would not conflict with goals, policies, and objectives in local and regional plans that were 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**

The Project's impact with regard to conflicts with applicable land use plans, policy or regulation adopted for the purpose of avoiding or mitigation an environmental effect would be less than significant. Therefore, no mitigation measures are required.

**(3) Level of Significance After Mitigation**

Project-level impacts with regard to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures are 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 Draft EIR, there are 44 related projects in the vicinity of the Project Site. The related projects generally consist of infill development including mixed use, retail, restaurant, residential, and office uses. Specifically, the related projects located within Project vicinity are shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. Sixteen of the 44 related projects are located within the City of Los Angeles and Wilshire Community Plan Area. These projects include residential uses, a hospital expansion, assisted living facilities, office uses, retail uses, a hotel, synagogue, restaurants, and medical offices. Entitlements requested for these projects include, but are not limited to, height district changes, zone changes and waivers of "Q" conditions to permit residential uses and additional hospital beds. As with the Project, the related projects would be required to comply with relevant land use policies and regulations as reviewed by City regulatory agencies and would also be subject to CEQA review. The related projects are not expected to fundamentally alter existing land use relationships in the community but, rather, concentrate development on particular sites and promote compatibility between existing, new uses and overall connectivity within the community. Therefore, the Project when combined with the related projects, would not have cumulatively significant land use impacts. Furthermore, the related projects would not cause cumulative land use impacts due to their similar characteristics (i.e., residential, office, and institutional uses) and because of the distance from the Project Site buffered by existing intervening development. Finally, the Project would have less-than-significant impacts related to conflicts with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Based on the mix of uses and buildings that currently comprise the community, as well as the proposed uses, as detailed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, the Project would be compatible with the uses of various existing and proposed developments in the immediate vicinity of the Project Site, as well as with the existing and proposed uses planned throughout the surrounding vicinity. Therefore, the combined effect from the Project and the related projects would not have a cumulatively significant impact related to land use. In addition, the Project would not have an incremental effect that would be cumulatively considerable and thus significant related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. **Therefore, cumulative impacts with regard to land use consistency would be less than significant and would not be cumulatively considerable.**

### (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

Cumulative impacts related to land use and planning would be less than significant without mitigation and not be cumulatively considerable. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.