

IV.D LAND USE AND PLANNING

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. A discussion of the Project's consistency with the applicable provisions of the San Vicente Scenic Corridor Specific Plan, Specific Plan Design Guidelines, and Citywide Design Guidelines is provided in Section VI, Other CEQA Considerations (Effects Not Found To Be Significant), of this Draft EIR. A discussion of the Project's consistency with the South Coast Air Quality Management District Air Quality Management Plan is provided in Section IV.A, Air Quality, of this Draft EIR.

1. Environmental Setting

a) Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- California Coastal Act of 1976
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Brentwood–Pacific Palisades Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- San Vicente Scenic Corridor Specific Plan
- West Los Angeles Transportation Improvement and Mitigation Specific Plan

(1) State

(a) *California Government Code Section 65302*

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social,

and economic goals. As stated in Section 65302 of the California Government Code, “The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals.” While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) *Senate Bill 375*

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 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*

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, and the provision of services by other regional agencies. SCAG’s overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal’s “Core Vision” centers on maintaining and better managing the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans “Key Connections” augment the “Core Vision” to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing

Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)¹ by six percent and the share of new job growth in HQTAs by 15 percent.

(3) Local

(a) *City of Los Angeles General Plan*

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

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element (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 HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

² City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>. Accessed March 6, 2021.

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

(a) *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.

(b) *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.

(c) *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.⁴ 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.

(d) 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.

(e) 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.

(f) 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

⁴ City of Los Angeles General Plan Framework, page 5-1, et. seq.

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.

(g) 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

The Transportation Element (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 2035 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 (Assembly Bill 1358).

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

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

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

(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.⁶ Through a new focus

⁵ Los Angeles Housing Element 2021-2029, page 242.

⁶ Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015, https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf. Accessed March 6, 2021.

on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5 An Environment Where Life Thrives*, which identifies the following environmental policies:

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

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

(vi) *Brentwood–Pacific Palisades Community Plan*

The City's 1996 Brentwood–Pacific Palisades Community Plan (Community Plan), which covers the Brentwood and Pacific Palisades communities, is the land use element of the General Plan applicable to the Project area. The Community Plan implements the General Plan Framework and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. Within the Brentwood - Pacific Palisades Community Plan, the Project Site has a land use designation of Neighborhood Office Commercial. The Brentwood-Pacific Palisades Community Plan includes a number of goals, objectives, and policies that are primarily related to commercial and residential development, and associated services such as parks, schools, libraries, and police and fire protection.

(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. The Project Site is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses, including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes a floor area ratio (FAR) of 1.5:1.

(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.

(d) *Specific Plans (SP)*

A Specific Plan (SP) is a district where special zoning stipulates the types of development permitted within a zoning district. Aligned with the goals of the General Plan and Community Plans, Specific Plans include development regulations for applicants to follow. The Project Site is located within the boundaries of the San Vicente Scenic Corridor Specific Plan and the West Los Angeles Transportation Improvement and Mitigation (TIMP) Specific Plan.

(i) *San Vicente Scenic Corridor Specific Plan*

The San Vicente Scenic Corridor Specific Plan was established in 1980 to implement expressed policies mandated by the Scenic Highways Plan and the Brentwood – Pacific Palisades Community Plan. The provisions of the San Vicente Scenic Corridor Specific Plan are individually tailored to address the unique character of San Vicente Boulevard, a designated scenic highway. As such, specific criteria were established to guide the ongoing and future development of that

portion of the City of Los Angeles, with the purpose to provide appropriate measures for maintaining the existing ambiance of San Vicente Boulevard, preserving and enhancing the inherent beauty and value of its landscaped median strip, and ensuring that commercial signage along San Vicente Boulevard is appropriately scaled and properly placed so as not to dominate the existing streetscape.

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

The West LA TIMP is intended to provide a mechanism to fund transportation improvements due to transportation impacts generated by new development within the TIMP Area. The plan specifies requirements for the issuance of building permits for properties in the West Los Angeles area including the Brentwood-Pacific Palisades area and establishes a fee process for new development in the C, M, and P zones.

b) Existing Conditions

The Project Site is developed with a two-story, approximately 23.5-foot tall, 13,956 square foot commercial building with surface parking located immediately north of the building. The existing building, known as the Barry Building, is City of Los Angeles Historic-Cultural Monument (HCM) No. LA-887. This building has been vacant and fenced off since 2017, and is boarded up with screwed-on plywood panels to prevent vandalism. As mentioned above, the Project Site has a General Plan land use designation of Neighborhood Office Commercial and is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes a floor area ratio (FAR) of 1.5:1.

Land uses in the vicinity of the Project Site include various commercial, residential, religious, and retail properties. Commercially-zoned parcels to the east and west of the Project Site are developed with a broad range of commercial and community-serving uses, including restaurants and stores. These uses occupy one- to nine-story buildings to the west and east of the Project Site along the southern and northern frontages of San Vicente Boulevard. Single-family residences are located north of the Project Site on residentially-zoned parcels and multi-family residences are located south of the Project Site, beyond San Vicente Boulevard. An undeveloped parcel lies to the west of the Project Site; a two-story commercial building lies to the east; and a surface parking lot (on APN 4404-025-016), vacant land, and a single-family residence (11900 Saltair Terrace) lie to the north. The southern boundary of the Project Site fronts San Vicente Boulevard.

2. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), a project would have a significant impact related to land use and planning if the project would do the following:

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

Threshold (b): 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.

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 and planning:

(a) 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) Land Use Compatibility

- *The extent of the area that would be impacted, the nature and degree of impacts, and the type 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 proposed project.*

b) Methodology

To evaluate the Project's impacts related to land use and planning, this analysis examines the Project's consistency with plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704,

717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in *Sequoyah*, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (*Friends of Lagoon Valley*).

Therefore, 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. 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. Nevertheless, the results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below.

c) Project Design Features

No specific project design features (PDFs) are proposed with regard to land use and planning.

d) Analysis of Project Impacts

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

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), the Project consists of the demolition of the Barry Building and the installation of a landscape buffer along the southern boundary of the Project Site. No future development of the Project Site is proposed and/or considered as part of the Project. The Project Site is located in an urbanized area with low- to mid-rise buildings that are occupied primarily by commercial and residential land uses. The Project does not contain features such as highways or new infrastructure that would cause a permanent disruption in the physical arrangement of the surrounding uses. Therefore, no impact would occur, and 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) *SCAG 2020-2045 RTP/SCS*

SCAG's 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians. SCAG's 2020-2045 RTP/SCS envisions intensified development in sub-regional job centers to encourage more growth of both jobs and housing by using technologies to improve the efficiency and performance of the transportation system. The Project involves the demolition of the existing Barry Building and installation of a landscape buffer along the southern boundary of the Project Site. The Project would not construct any new development on the Project Site. As no new development is proposed, the strategies and policies contained in the 2020-2045 RTP/SCS would not be applicable to the Project.

(b) *City of Los Angeles General Plan*

The City of Los Angeles General Plan includes a number of goals, objectives, and policies that are designed to guide future development in the City. However, as the Project does not include the development of any new uses on the Project Site, the majority of the goals, objectives, and policies contained in the General Plan would not be applicable to the Project. The Conservation Element contains a cultural and historical objective and policy, which state the desire to protect cultural and historical sites from demolition or property modification activities. The Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007. Therefore, the Project would conflict with this objective and policy calling for historic preservation.

As the Project would result in the demolition of an existing historical resource, the Project would conflict with the applicable objective and policy in the Conservation Element related to the preservation of historical resources. Therefore, the Project would result in a potentially significant impact with respect to consistency with the City of Los Angeles General Plan since all other goals, objectives, or policies are related to development of the Project Site and would not be applicable to the Project.

(c) *Brentwood – Pacific Palisades Community Plan*

The Brentwood-Pacific Palisades Community Plan includes a number of goals, objectives, and policies that are primarily related to commercial and residential development, and associated

services such as parks, schools, libraries, and police and fire protection. Since the Project does not propose the development of any new commercial or residential uses, the majority of the goals, objectives, and policies contained in the Brentwood-Pacific Palisades Community Plan would not be applicable to the Project. The Project's consistency with applicable goals, objectives, and policies in the Brentwood – Pacific Palisades Community Plan related to the preservation of historic and cultural resources is discussed below in Table IV.D-1.

**Table IV.D-1
Project Consistency with Applicable Goals, Objectives, and Policies of the
Brentwood-Pacific Palisades Community Plan**

Goals, Objectives, and Policies	Project Consistency
<p>Objective 1-4: To preserve and enhance neighborhoods with a distinctive historic character.</p> <p>Policy 1-4.1: Protect and encourage reuse of the area's historic resources.</p> <p>Policy 1-4.2: Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.</p>	<p>Conflict. The Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007. Therefore, the Project would conflict with the objective and policies calling for historic preservation. See Section IV.B, Cultural Resources, of this Draft EIR for a full analysis of Project impacts to historical resources.</p>
<p>Goal 17: A community which preserves and restores the monuments, cultural resources, neighborhoods, and landmarks which have historic and/or cultural significance.</p> <p>Objective 17-1: To ensure that the Plan Area's significant cultural and historic resources are protected, preserved, and/or enhanced.</p> <p>Policy 17-1.1: Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public.</p>	<p>Conflict. The Project involves the demolition of the Barry Building, which the City of Los Angeles designated as HCM No. LA-887 in 2007. Therefore, the Project would conflict with this goal, objective, and policy calling for historic preservation. See Section IV.B, Cultural Resources, of this Draft EIR for a full analysis of Project impacts to historical resources.</p>
<p>Policy 17-1.2: Protect and preserve archaeological sites of Native Americans.</p>	<p>No Conflict. As discussed in Section IV.G, Tribal Cultural Resources, of this Draft EIR, in response to a sacred lands file search conducted with the Native American Heritage Commission (NAHC), the NAHC indicated that no sacred lands or sites are documented within the Project area. In addition, the demolition, which would include the removal of the existing utilities (approximately two to five feet underground) would only disturb soils that have been previously disturbed by past development activities. Finally, the Tribal Cultural Resources Assessment prepared for the Project Site (included in Appendix F-3 of this Draft EIR) determined that the Project Site has a low sensitivity for containing unknown tribal cultural resources.</p>
<p>Source: City of Los Angeles, Brentwood-Pacific Palisades Community Plan, adopted June 1998.</p>	

As demonstrated in the table above, the Project would conflict with several of the applicable goals, objectives, and policies, all of which are related to the preservation of historical resources, as the Project would result in the demolition of a designated historical resource. As previously stated, the remaining policies contained in the Brentwood-Pacific Palisades Community Plan (such as those related to residential and commercial development) would not apply to the Project since development of the Project Site is not proposed. Therefore, the Project would result in a potentially significant impact with respect to consistency with the Brentwood-Pacific Palisades Community Plan.

(d) Citywide Design Guidelines

As discussed above, the Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles. A discussion of the Project's consistency with the applicable policies of the Citywide Design Guidelines is provided in Table 4.I-5 of the Initial Study (which is included as Appendix A-1 of this Draft EIR). As discussed in this table, the Project would not conflict with any applicable guidelines, and therefore, the Project's impact would be less than significant.

(e) San Vicente Scenic Corridor Specific Plan

As described previously, the Project Site is located within the boundaries of the San Vicente Scenic Corridor Specific Plan. A discussion of the Project's consistency with the applicable provisions of the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-3 of the Initial Study (which is included as Appendix A-1 of this Draft EIR) and a discussion of the Project's consistency with the applicable design guidelines contained in the San Vicente Scenic Corridor Specific Plan is provided in Table 4.I-4 of the Initial Study. As discussed in these tables, the Project would not conflict with any applicable policies and guidelines, and therefore, the Project's impact would be less than significant.

(f) West Los Angeles TIMP

The Project Site also falls within the boundaries of the West Los Angeles TIMP Specific Plan. However, the Project would be exempt from the requirements of the TIMP as the Project consists of the demolition of the existing building, and no future development of the Project Site is proposed and/or considered as part of the Project.

(g) Los Angeles Municipal Code

The Project Site is zoned C4-1VL (Commercial Zone, Height District 1VL). The Commercial Zone permits a range of commercial uses including retail and office uses. Within Height District 1VL, the C4 zone allows for a building height maximum of up to 45 feet and establishes an FAR of 1.5:1. As the Project consists of the demolition of the existing building and the installation of a landscape buffer along the southern boundary of the Project Site, and no future development of

the Project Site is proposed and/or considered, the Project would not conflict with the existing zoning, and no impact would occur.

(h) Conclusion

As described above, the Project would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. However, the Project would conflict with the goals, objectives, and policies of the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan related to historic preservation, which are the only goals, objectives, and policies applicable to the Project since development of the Project Site is not proposed. Therefore, Project impacts would be significant.

(2) Mitigation Measures

As described in Section IV.B, Cultural Resources, Mitigation Measure MM-CUL-1 would be undertaken by the Project Applicant, which requires the Barry Building to be documented prior to demolition.

(3) Level of Significance After Mitigation

Even with implementation of Mitigation Measure MM-CUL-1, the Project would conflict with the applicable land use goals, objectives, and policies as the Project would demolish the existing historical resource. Therefore, Project impacts related to land use and planning would remain significant and unavoidable.

e) Cumulative Impacts

(1) Impact Analysis

Cumulative land use impacts could occur if any of the related projects would result in incompatible land uses, or result in land uses that are inconsistent with adopted land use plans when combined with the impacts of the Project. As previously stated in Section III, Environmental Setting, there are seven related projects located within proximity to the Project Site. Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing and sources of employment. The Project does not propose any new land uses on the Project Site and would not result in any changes to the General Plan land use designation and zoning regulations applicable to the Project Site. The related projects would be generally consistent with the surrounding areas in which they would be developed, and implementation of each related project would be subject to applicable development standards and environmental review so as to be consistent with adopted land use plans and policies. While the Project would result in a significant and unavoidable impact with respect to consistency with the General Plan (Conservation Element) and the Brentwood-Pacific Palisades Community Plan based on the demolition of a historical resource, the Barry Building is

not a contributor to any established historic district or HPOZ and does not contribute to the significance of any other individual historic resources. Therefore, the Project impacts to historical resources would not be cumulatively considerable and cumulative impacts related to land use and planning would be less than significant.

(2) Mitigation Measures

No significant cumulative impacts to land use and planning have been identified, and 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.