

# **IV. Environmental Impact Analysis**

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## **H. Land Use**

### **1. Introduction**

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

### **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 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Palms–Mars Vista–Del Rey Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- Clean Up Green Up Ordinance
- Coastal Transportation Corridor Specific Plan

## (1) State

### *(a) California Government Code Section 65302*

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

### *(b) Senate Bill 375*

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 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 5-percent reduction in VMT per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)<sup>1</sup> by 6 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),<sup>2</sup> 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,<sup>3</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

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

<sup>2</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 January 11, 2022.

<sup>3</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).

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) 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.

(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>4</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.

### (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 imperatives require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

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<sup>4</sup> *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

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### (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.

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*(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 (AB 1358).

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

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

*(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.

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*(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 committed to ending and preventing homelessness.<sup>5</sup>

*(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>6</sup> It is also the primary location of environmental justice goals, policies, and implementation programs in the General Plan. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5, An Environment Where Life Thrives*, which identifies the following environmental policies:

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<sup>5</sup> *City of Los Angeles, Los Angeles Housing Element 2021–2029, p. 242.*

<sup>6</sup> *City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, November 2021.*



- 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.
- Reduce exposure to second-hand smoke by promoting smoke-free environments and market and support public, private, and nonprofit cessation programs and services.
- 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.
- In collaboration with residents and public, private, and nonprofit partners, explore opportunities to continue to remediate and redevelop brownfield sites in order to spur economic development, expand natural open spaces and parks, community gardens, and other similar health-promoting community revitalization activities particularly in the city's most underserved neighborhoods.
- In collaboration with residents and public, private, and nonprofit partners, 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, and target resilience in the most vulnerable communities.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

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) Palms–Mar Vista–Del Rey Community Plan*

The Palms–Mar Vista–Del Rey Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the Framework Element. Adopted on November 20, 1985 and updated in 1997, the specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Palms–Mar Vista–Del Rey community within the larger framework of the City. In addition, the Community Plan serves to guide the

development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

As shown in Figure IV.H-1 on page IV.H-11, the current land use designation for the Project site, pursuant to the Community Plan, is Light Industrial. The Project's consistency with applicable land use policies in the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Community Plan applicable to the Project site is included in Table 4 of Appendix H of this Draft EIR, along with a discussion of whether the Project conflicts with that particular goal, objective, or policy.

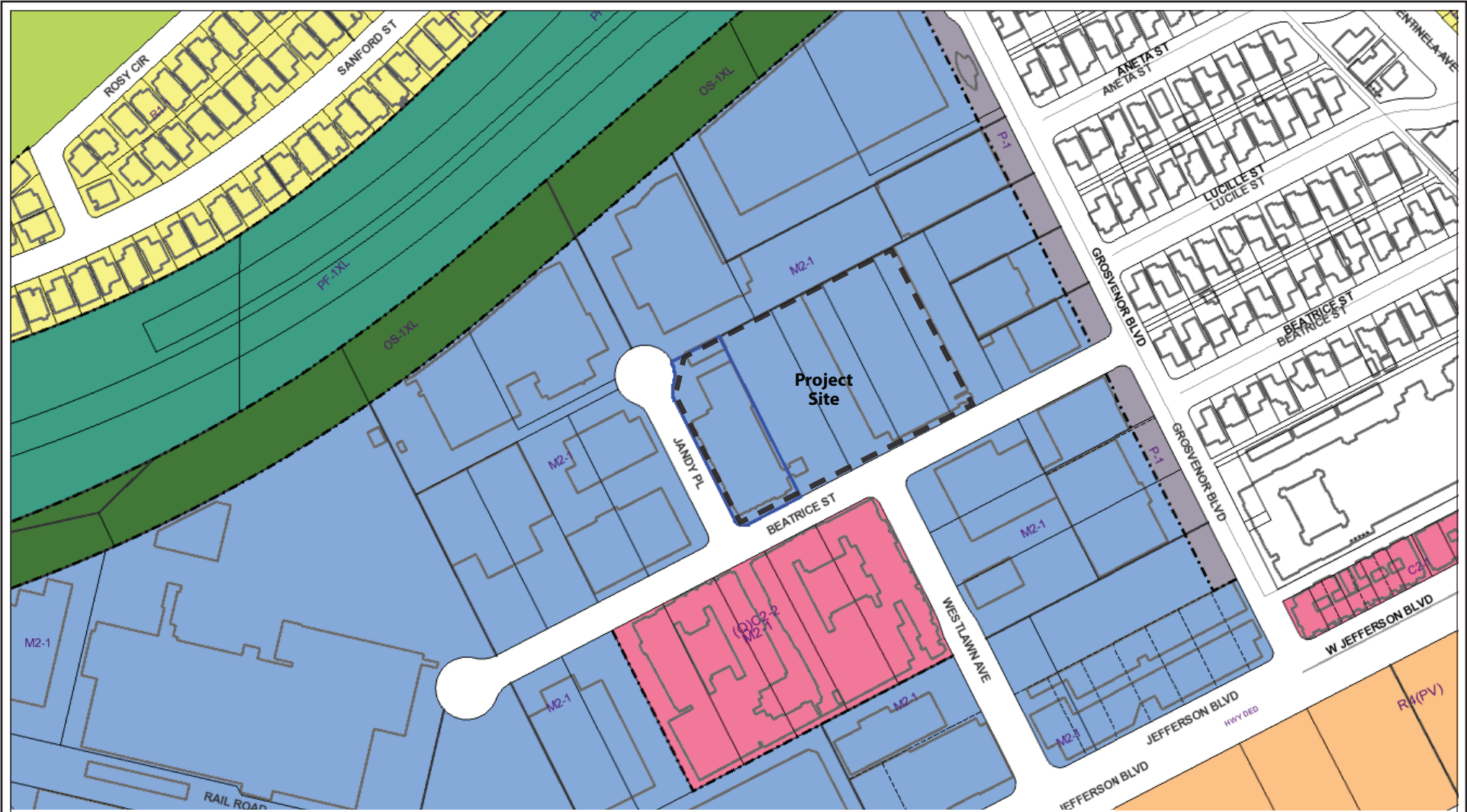
The Department of City Planning is currently in the process of updating the Community Plan and has presented draft land use concepts to the community beginning in July 2020. These draft concepts are based on community input; City Planning's analysis of existing land use, zoning, and development patterns; and local and regional objectives for housing, jobs, environmental sustainability, and quality of life. Because the update is not yet adopted, the existing version of the Community Plan, adopted in 1997, is used for the purpose of this analysis.

*(b) Los Angeles Municipal Code*

All development activity on the Project site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. As shown in Figure IV.H-2 on page IV.H-12, the Project site is zoned M2-1 (Light Industrial, Height District 1), which permits M1 or MR2 uses; airport or aircraft landing field; automobile dismantling yard; cemetery; circus quarters; morgue; riding academy or stable; rifle range; curing, composting, and mulching facilities; and cargo container storage yard. Height District 1 within the M2 Zone has no height limit but restricts the maximum Floor Area Ratio (FAR) to 1.5 to 1. The Project's consistency with applicable LAMC requirements is described in the impact analysis below.

*(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



**LEGEND**

**RESIDENTIAL**

- Open Space
- Low I Residential
- Low Medium I Residential

**COMMERCIAL**

- Neighborhood Office Commercial

**INDUSTRIAL**

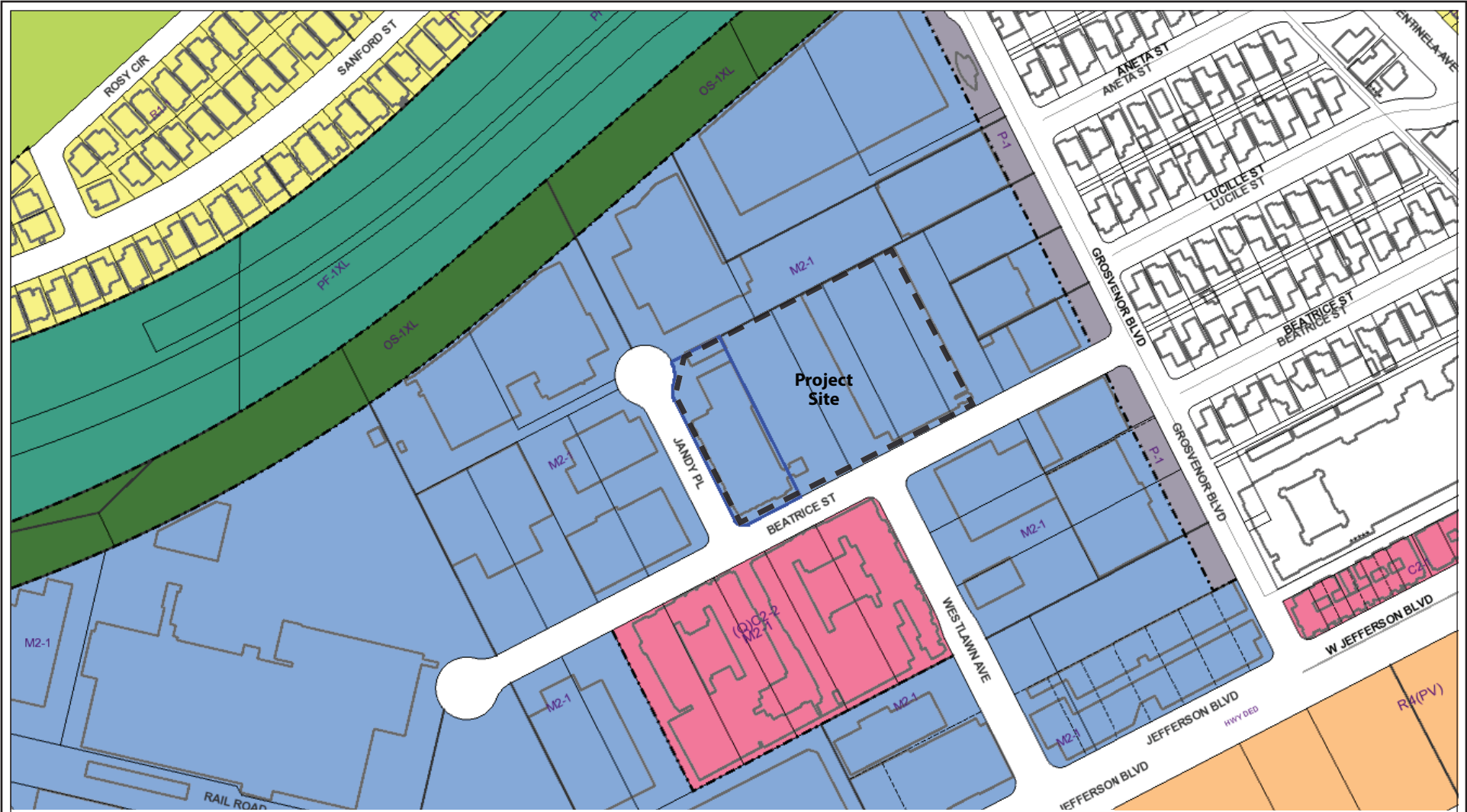
- Light Manufacturing

**OPEN SPACE / PUBLIC FACILITIES**

- Open Space
- Public Facilities

**Figure IV.H-1**

Land Use Designations for the Project Site and Vicinity



**LEGEND**

**GENERALIZED ZONING**

- |   |   |   |
|---|---|---|
| <span style="display:inline-block; width:15px; height:15px; background-color:darkgreen; border:1px solid black;"></span> OS, GW               | <span style="display:inline-block; width:15px; height:15px; background-color:orange; border:1px solid black;"></span> R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP                             | <span style="display:inline-block; width:15px; height:15px; background-color:purple; border:1px solid black;"></span> P, PB |
| <span style="display:inline-block; width:15px; height:15px; background-color:lightgreen; border:1px solid black;"></span> A, RA               | <span style="display:inline-block; width:15px; height:15px; background-color:pink; border:1px solid black;"></span> CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU | <span style="display:inline-block; width:15px; height:15px; background-color:teal; border:1px solid black;"></span> PF      |
| <span style="display:inline-block; width:15px; height:15px; background-color:yellow; border:1px solid black;"></span> RE, RS, R1, RU, RZ, RW1 | <span style="display:inline-block; width:15px; height:15px; background-color:blue; border:1px solid black;"></span> CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI              |   |

**Figure IV.H-2**

Zoning Designations for the Project Site and Vicinity

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) Plan Overlays*

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City’s General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

*(i) Clean Up Green Up Ordinance*

As part of its Clean UP Green UP campaign, the City Council adopted Ordinance 184,245 (effective June 2016) adding Sections 95.314.3 and 99.04.504.6 to the LAMC and amending Section 99.05.504.5.3 of the LAMC to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns within the City. Section 99.04.504.6 of the LAMC requires mechanically ventilated buildings within 1,000 feet of a freeway to provide regularly occupied areas of the building with air filtration media for outside and return that provides a Minimum Efficiency Reporting Value (MERV) of 13.

*(ii) Coastal Transportation Corridor Specific Plan*

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 City adopted the Coastal Transportation Corridor Specific Plan (Specific Plan) to establish a transportation mitigation program for all lots located in whole or in part within the Specific Plan area. The regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of LAMC Chapter I and any other relevant

ordinances. Provisions within the Specific Plan supersede the applicable regulations of the LAMC unless overridden by the LAMC or another adopted ordinance.

The Specific Plan was amended in 2019 to implement City and state policies that reprioritize transportation improvements to focus on access to transit and active transportation as strategies to reduce dependence on vehicular travel, and reduce vehicle miles traveled (VMT) and associated greenhouse gas emissions. Such policies include those from the General Plan Framework Element, Mobility Plan 2035, and state legislation such as SB 375, SB 743, and AB 1358. The Specific Plan also intends to improve mobility options, accommodate multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle), and promote best practices in Transportation Demand Management (TDM) to reduce auto trips per capita and VMT per capita. The Specific Plan focuses on enhancing transit connectivity, “first mile-last mile” solutions, and coordinated transportation plans and programs with other jurisdictions and public agencies. In addition, the Specific Plan encourages parking strategies, neighborhood protection programs, affordable housing developments near jobs and transit, and enhanced streetscapes that reinforce neighborhood identity on portions of major arterials.

Furthermore, the Specific Plan establishes fees and provisions for new development in order to mitigate transportation impacts as well as fund and implement specific transportation improvements within the Specific Plan area. The Specific Plan also strives to ensure that costs for transportation improvements are fairly distributed among all future land uses that will contribute to transportation impacts; that contributors to this Specific Plan’s fund will benefit from the public transportation, bicycle, and pedestrian improvements constructed using funds; and that fees do not hinder the development of housing for diverse income levels (including low income) in the Westside.

The Project’s consistency with applicable purposes of the Specific Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

## **b. Existing Conditions**

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

As discussed in Section II, Project Description, of this Draft EIR, the Project site is currently developed with a 23,072-square-foot office building and two accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and an 87,881-square-foot office building at 12541 W. Beatrice Street, as well as surface parking. The Project site contains limited to sparse landscaping in the form of trees, hedges, and shrubs.

As previously discussed and as shown in Figure IV.H-1 on page IV.H-11, the Project site is designated as Light Industrial by the Palms–Mar Vista–Del Rey Community Plan. As shown in Figure IV.H-2 on page IV.H-12, the Project site is zoned M2-1 (Light Industrial, Height District 1). As identified above, the Project site is also located within an HQTAs as designated by SCAG.<sup>7,8</sup>

## (2) Surrounding Uses

The Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. As shown in Figure IV.H-3 on page IV.H-16, the area surrounding the Project site is fully developed primarily with a mix of office, light industrial, and manufacturing uses. One multi-family residential structure is located across Beatrice Street from the Project site. Specifically, two-story office uses are located immediately adjacent to the Project site on the north, with the Centinela Creek Channel and State Route 90 located further north. Adjacent to the eastern side of the Project site are two 2-story commercial office/industrial buildings and a five-level parking structure on the Project site's northeastern side. South of the Project site, across Beatrice Street, is the five-story Avalon Playa Vista apartment complex (west of Westlawn Avenue) and a two-story office building (east of Westlawn Avenue). Further south of the Project site, across Jefferson Boulevard, is the large mixed use office, retail and residential community of Playa Vista. Jefferson Boulevard is developed with a variety of mid-rise office and multi-family residential buildings that generally range in height from five- to seven-stories. West of the Project site, across Jandy Place, are two- to three-story studio/office uses and an associated surface parking area.

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<sup>7</sup> SCAG, *Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 3.8, adopted for federal transportation purposes May 7, 2020.*

<sup>8</sup> *Los Angeles County Metropolitan Transportation Authority (Metro), High Quality Transit Areas—Southwest Quadrant map.*





**Figure IV.H-3**  
Surrounding Uses



### 3. Project Impacts

#### a. Thresholds of Significance

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

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

***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.***

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

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

#### b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. 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. As discussed in the Office of Planning and Research (OPR), State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoiah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.<sup>9</sup>

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

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

### **d. Analysis of Project Impacts**

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

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, and summarized in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would not divide an established community. As previously discussed, the Project site is currently developed with an office building and two accessory buildings at 12575 W. Beatrice Street and an office building at 12541 W. Beatrice Street as well as surface parking.

The Project would replace the existing office building and accessory structures at 12575 W. Beatrice Street with a new office building. The existing office building at 12541 W. Beatrice Street would remain. All proposed development would occur within the boundaries of the Project site, and the Project would not require the vacation of any

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<sup>9</sup> *Sequoiah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-719.

surrounding streets adjacent to the Project site. The proposed office, restaurant, and retail uses would also be consistent with the uses already on the Project site and immediately surrounding the Project site. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

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

### (1) Impact Analysis

#### *(a) Consistency with Regional Plans*

##### *(i) Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)*

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in Table 1 of Appendix H of this Draft EIR. As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing an integrated creative office campus with ground floor restaurant and retail uses on a Project site within a designated HQTAs that is well-served by public transit. As previously discussed, with implementation of the TDM Program pursuant to Mitigation Measure TR-MM-1 in Section IV.K, Transportation, of this Draft EIR, the Project would include the subsidization of transit fare for employees, which would encourage the use of the regional transportation system. Given the Project's proximity to multiple public transit options, including bus transit lines operated by Metro, Culver CityBus, and City of Santa Monica Big Blue Bus, the Project would provide employees and visitors convenient access to transit services. Also as part of the TDM Program, the Project would promote non-auto travel and reduce the use of single-occupant vehicle trips by including measures, such as workplace parking pricing, travel behavior change programming, bicycle parking (63 spaces) with facilities, such as showers and a repair station. Furthermore, the Project would enhance pedestrian activity in the area by providing landscaping, seating areas, new sidewalks, and access points throughout the Project site, including a pedestrian paseo with landscaping and seating areas between the new building and the existing office building to be retained. As such, the Project would support the reduction in GHG emissions and the improvement of air quality by encouraging active transportation (e.g.,

bicycling and walking). Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the 2020–2045 RTP/SCS.

*(ii) South Coast Air Quality Management District Air Quality Management Plan*

The SCAQMD is responsible for developing plans for ensuring that air quality in the South Coast Air Basin conforms with federal and State air pollution standards. In conjunction with SCAG, the SCAQMD has prepared the 2016 AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of State and federal air quality standards in the South Coast Air Basin. As further detailed and analyzed in Section IV.B, Air Quality, of this Draft EIR, the Project would not conflict with the applicable policies set forth in SCAQMD's AQMP.

*(b) Consistency with Local Plans and Applicable Policies*

As discussed above, various local plans and regulatory documents guide development of the Project site. The following discussion addresses the Project's consistency with local goals, objectives, and policies of the General Plan Framework Element, Mobility Plan 2035, Conservation Element, Health and Wellness Element, the Palms–Mars Vista–Del Rey Community Plan, LAMC, the City of Los Angeles Coastal Transportation Corridor Specific Plan, and the Citywide Design Guidelines that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

*(i) Los Angeles General Plan*

(1) General Plan Framework Element

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

*(a) Land Use Chapter*

As discussed above, the Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood in the City of Los Angeles and is not located within the boundaries of any land use categories identified in the Framework Element's Long Range Land Use Diagram for the City's West/Coastal area. The Project site is designated for Light Industrial land uses per the Palms–Mar Vista–Del Rey

Community Plan. The Project would support and would be consistent with the applicable goals, objectives, and policies of the Land Use Chapter of the Framework Element. Specifically, the Project would develop a new eight-story office building within the western portion of the Project site to provide 196,100 square feet of office space and 3,400 square feet of ground floor retail and restaurant space. While the Project would increase the height, density, and mass of on-site structures as compared to existing conditions, the proposed building would be oriented and designed to maintain the prevailing scale and character of the surrounding area. Specifically, the massing of the new building would be offset by landscaped terraces, and multiple wall planes would provide articulation on the building façade. Additionally, the Project would step down in size and scale lowering in height from 135 feet on the western portion of the Project site to the existing 20-foot-tall office building on the eastern portion of the Project site. Furthermore, to enhance the pedestrian environment for use by visitors and tenants, the Project would also add a pedestrian paseo with landscaping and seating areas between the new building and the existing office building to be retained on-site. As such, the Project would create an integrated creative office campus that would support the employment and commercial needs of the growing number of residents, businesses, and visitors in the vicinity.

The Project would also incentivize alternative modes of transportation by requiring future project employees to pay for vehicle parking on-site, and providing transit subsidies to those that choose not to drive. The Project would also provide bicycle parking spaces on-site in an area with its own access point and bicycle facilities, such as showers and repair station, to support safe and comfortable bicycle travel by providing end-of-trip amenities. Thus, the Project would provide opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, VMT, and air pollution.

Overall, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

*(b) Urban Form and Neighborhood Design Chapter*

The Project would promote the applicable goals and objectives of the Urban Form and Neighborhood Design Chapter by developing an integrated creative office campus that would activate the existing site. The Project would improve the area by removing three structures to include the accessory buildings with a modernized office building with ground floor retail and restaurant space and providing landscaped courtyards and seating areas on-site. The Project would also improve the pedestrian environment by incorporating landscaping, seating areas, new sidewalks and access points throughout the Project site. Trees and landscaping features would be planted throughout and around the Project site. As such, the Project development would be attractive to future investment and would

contribute to a mixed-use neighborhood at both the local and citywide scale when considered with other commercial office, industrial, and mixed-use developments in the area.

In addition, Project signage would be designed to be compatible with the Project buildings and with other signage in the Project area, and the Project would incorporate design features to promote individual and community safety on the Project site. As such, the building design, landscaping, and streetscape improvements proposed under the Project would upgrade the quality of development on the Project site and improve the public realm.

Therefore, the Project would not conflict with the applicable objectives and policies in the Urban Form and Neighborhood Design Chapter of the Framework Element.

*(c) Open Space and Conservation Chapter*

As discussed above, trees and landscaping features would be planted throughout and around the Project site. The proposed building would also feature outdoor terraces for tenants. These spaces would be onsite and privately managed and would not encroach upon other land uses. Additionally, an approximately 389-square-foot lot would be created at the corner of Jandy Place and Beatrice Street for landscaping and open space purposes. Therefore, the Project would not conflict with the applicable goals in the Open Space and Conservation Chapter of the Framework Element.

*(d) Economic Development Chapter*

The Project's development of 196,100 square feet of office space and 3,400 square feet of ground floor retail and restaurant space would create new employment opportunities. The Project would support the employment base of the Community Plan area and foster continued economic investment. The proposed uses would also be developed in an area with convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Furthermore, as described in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, the Project would use potentially hazardous materials, including those commonly used for building and ground maintenance, cleaning solvents, and pesticides for landscaping. Activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements. In addition, as discussed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, the Project would implement best management practices (BMPs) to minimize the discharge of pollutants in stormwater runoff and would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. In so doing, the Project would

support the establishment of a balance of land uses that provide for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. As such, the Project would not conflict with the applicable objective and policy in the Economic Development Chapter of the Framework Element.

(e) Infrastructure and Public Services Chapter

As discussed in Section IV.M.1, Utilities and Service Systems—Water Infrastructure and Section IV.M.2, Utilities and Service Systems—Energy Infrastructure of this Draft EIR, and the Initial Study included in Appendix A of this Draft EIR, agencies providing public services and utilities to the Project site would have capacity to serve the Project. Wastewater generated by the Project would be typical of office, retail, and restaurant uses and would not include industrial grade discharge containing hazardous substances. Furthermore, the Project would include water conservation features to reduce water usage in accordance with LAMC requirements. Accordingly, the total amount of wastewater flow from the Project site would also be reduced. In addition, as discussed in Section IV.J.1, Public Services—Fire Protection and Section IV.M.1, Utilities and Service Systems—Water Infrastructure, upgrades to fire flow infrastructure are anticipated and would involve replacing the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and adding fire hydrants in the area to increase fire flow protection. Furthermore, the Project would provide ample space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. Project lighting would be designed to minimize light trespass from the Project site and would comply with all LAMC requirements. Therefore, the Project would not conflict with the applicable goals, objectives, and policies in the Infrastructure and Public Services Chapter of the Framework Element.

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

(f) Conclusion

In summary, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element adopted specifically to mitigate or avoid an environmental impact.

(2) Mobility Plan 2035

The Project would support the City's policy to provide for safe passage of all modes of travel during construction by implementing a Construction Staging and Traffic Management Plan and Worksite Traffic Control Plan that incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimizes the potential conflicts between construction activities, street traffic, transit stops,

and pedestrians; and reduces congestion to public streets and highways. The Project would also support Mobility Plan 2035 policies to ensure high quality pedestrian access and to provide a safe and comfortable walking environment by providing landscaping, seating areas, new sidewalks, and access points throughout the Project site. As discussed above, retail and restaurant uses would be located on the ground floor. In addition, the street dimensions adjacent to the Project site would comply with Mobility Plan 2035 requirements and would not require widening along adjacent streets.

Furthermore, the Project would support ways to reduce VMT and promote the City's policy to recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle parking spaces in an area with its own access point and bicycle facilities, such as showers and repair station, to support safe and comfortable bicycle travel by providing end-of-trip amenities. In accordance with Mitigation Measure TR-MM-1, the Project would implement a Transportation Demand Management (TDM) Program to promote non-auto travel and reduce the use of single-occupant vehicle trips by including measures, such as workplace parking pricing, travel behavior change programming, bicycle parking with showers, and subsidization of transit fares. Given the Project's proximity to multiple public transit options, including bus transit lines operated by Metro, Culver CityBus, and City of Santa Monica Big Blue Bus, the Project would provide employees and visitors convenient access to transit services. As such, the Project would serve to reduce VMT. Therefore, the Project would not conflict with the applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect.

### (3) General Plan Conservation Element

As noted above, the City's Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources. These include agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resource areas. As discussed in the Initial Study, included as Appendix A, and in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would have no impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, the Project site does not contain any historical resources, as there are no historic resources within and adjacent to the Project site, and impacts to historic resources would be less than significant. The Project would also implement the City's standard conditions of approval to ensure that potential impacts to archaeological and paleontological resources would remain less than significant. Therefore, the Project would not conflict with Section 5 of the Conservation Element. Furthermore, as analyzed in the Section IV.A, Aesthetics, of this Draft EIR, the Project would not obstruct or remove access to natural and scenic vistas. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the



preservation of public views of visual resources. As such, the Project would not conflict with the Conservation Element.

#### (4) General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

As previously discussed, the Health and Wellness Element includes the goal to provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins. Under this goal, the Health and Wellness Element includes a policy to reduce air pollution from stationary and mobile sources, protect human health and welfare, and promote improved respiratory health. The Project would encourage pedestrian activity on and around the Project site by creating more pedestrian-scaled Project frontages along Jandy Place and Beatrice Street. Restaurant and retail uses would be placed at ground level to increase transparency and create a more welcoming pedestrian environment. In addition, the Project would provide 63 bicycle parking spaces to promote biking, and the Project's close proximity to nearby bus lines would promote use of public transit. As such, the Project would support the Health and Wellness Element's efforts to reduce vehicle use through implementation of smart growth mixed land use patterns, which would support the reduction of air pollution. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

#### (5) Palms–Mar Vista–Del Rey Community Plan

The Project's consistency with the objectives and policies set forth in the Community Plan is discussed in detail in Table 4 of Appendix H of this Draft EIR and summarized below.

As previously discussed, the Project site is zoned for light industrial uses but is currently developed with office uses and accessory structures. The Project would replace three structures with a modern office building with ground floor retail and restaurant uses that would respond to the evolving needs of a growing creative office commercial sector. The Project would retain the existing office building within the eastern portion of the Project site with the new office building with ground floor retail and restaurant uses within the western portion of the Project site, creating an integrated creative office campus. The Project would be designed to enhance the character and scale of the surrounding uses. Specifically, the Project would step down in size and scale, lowering in height from 135 feet on the western portion of the Project site to the existing 20-foot-tall office building on the eastern portion of the Project site. The building's varying sized floor plates accented by outdoor areas and extensive landscaping are designed to reduce the feeling of the mass of the building. The Project would provide landscaping, seating areas, new sidewalks, and

access points throughout the Project site. The above grade parking would be fully screened with architectural elements and landscaping.

Project lighting would be designed to minimize light trespass from the Project site and would comply with all LAMC requirements. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present.

In addition, the Project site's proximity to a variety of public transit options and nearby commercial and offices uses, combined with the provision of bicycle parking spaces with facilities, such as showers, and a repair station onsite, would also promote alternative modes of transportation that would reduce vehicle trips. Furthermore, the Project would implement a TDM Program (Mitigation Measure TR-MM-1 in Section IV.K, Transportation, of this Draft EIR), including workplace parking pricing, travel behavior change programming, and subsidization of transit fares to promote non-auto travel and reduce the use of single-occupant vehicle trips.

Based on the above and as presented in Table 4 of Appendix H of this Draft EIR, the Project would not conflict with the applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

*(ii) Los Angeles Municipal Code*

As shown in Figure IV.H-2 on page IV.H-12, the Project site is zoned M2-1 (Light Industrial, Height District 1), which permits M1 or MR2 uses; airport or aircraft landing field; automobile dismantling yard; cemetery; circus quarters; morgue; riding academy or stable; rifle range; curing, composting, and mulching facilities; and cargo container storage yard. Height District 1 within the M2 Zone has no height limit but restricts the maximum Floor Area Ratio (FAR) to 1.5 to 1.

As previously described, the Project would develop 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor retail and restaurant space. The height of the proposed building would be approximately 135 feet to the top of the roof or parapet. Per the LAMC Section 12.21.1.B.3, a mechanical penthouse component could extend approximately 20 feet above the building roof or parapet.

As part of the Project, the existing structures at 12575 W. Beatrice Street within the western portion of the Project site would be removed while the existing 87,881-square-foot office building at 12541 W. Beatrice Street within the eastern portion of the site would be retained. Pursuant to LAMC Section 17.50 B.3(c), the Project Applicant would request a

Parcel Map Exemption—Lot Line Adjustment to adjust the existing Project site lot lines to accommodate a larger building site for the new construction at 12575 W. Beatrice Street. When approved and the lot line adjustment is complete, the lot at 12575 W. Beatrice Street would contain approximately 103,281 square feet (2.37 acres), and the lot at 12541 W. Beatrice Street would contain approximately 93,182 square feet (2.14 acres). As such, the Project's overall FAR would be 1.46:1.

Per LAMC Section 12.21 A.4(c) and 12.21 A.4(j), the Project would be required to provide 586 vehicles parking spaces. The Project would provide a total of 811 parking spaces, fulfilling the requirements of the LAMC. In addition, per LAMC Section 12.21 A.16(a)(2), the Project would be required to provide 22 short-term and 41 long-term bicycle parking spaces. Accordingly, the Project would comply by providing 63 bicycle parking spaces (22 short-term, 41 long-term). As such, the Project would comply with the LAMC parking requirements.

The Project also would comply with California Green Building Standards (CALGreen) Code, including Los Angeles Green Building Code Section 95.05.211, which requires a minimum of 3,300 square feet of roof area reserved for a solar photovoltaic system, and City of Los Angeles requirements for the provision of electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. Specifically, 30 percent of the Project's parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE) and 10 percent of spaces would have EV charging stations, as required by City of Los Angeles Ordinance 186,485.

The Project Applicant also seeks the approval of a Site Plan Review to authorize the Project's new building and uses pursuant to LAMC Section 16.05, and a Conditional Use Permit for "Major" development project pursuant to LAMC Section 12.24 U.14.

With approval of the requested discretionary actions, the Project would be consistent with applicable LAMC requirements.

*(iii) City of Los Angeles Coastal Transportation Corridor Specific Plan*

The Project would be aligned with applicable purposes of the Specific Plan. Specifically, the Project would support the Specific Plan's purpose to encourage walking and bicycling as a means to safely and conveniently access transit and circulate within the neighborhood by providing 63 bicycle parking spaces, landscaping, seating areas, new sidewalks and access points throughout the Project site. These elements along with the ground floor retail uses would encourage pedestrian activity in and around the Project site and provide a safe active pedestrian environment. In addition, the Project would also comply with the transportation assessment procedures set forth in Section 5 of the Specific Plan. As provided in the Project's Transportation Assessment included in Appendix K of

this Draft EIR, the analysis was conducted based on a completed Memorandum of Understanding per LADOT, and the assessment has been reviewed by LADOT with all appropriate fees paid. (A copy of LADOT's Approval Letter for the Transportation Assessment is included in Appendix K of this Draft EIR.) As detailed in the Transportation Assessment and discussed above, in accordance with Mitigation Measure TR-MM-1 in Section IV.K, Transportation, of this Draft EIR, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips with measures, such as workplace parking pricing, travel behavior change programming, bicycle parking with facilities, such as showers and repair station, and subsidization of transit fares.

Furthermore, as a new development within the Specific Plan Area, the Project would provide funding to implement specific transportation improvements in the vicinity of the Project site. Specifically, in cooperation with LADOT and as documented in the Transportation Assessment, the Project Applicant shall fund a yellow flashing signal at the existing striped crosswalk on Inglewood Boulevard at Beatrice Street, which is located approximately 0.5 mile east of the Project site and which has already been installed. If, at the time of project approval, this improvement has been funded by others, then LADOT shall require a similar nearby measure of equivalent value designed to enhance pedestrian and student safety in the vicinity of the Project.

Therefore, the Project would not conflict with relevant aspects of the Specific Plan adopted for the purpose of avoiding or mitigating an environmental effect.

*(iv) Citywide Design Guidelines*

The Citywide Design Guidelines are intended as performance goals and not strict regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all are appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines.

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

Pedestrian connections and sidewalk improvements and amenities included as part of the Project would enhance the pedestrian experience on and surrounding the Project site. Pedestrian access to the Project site would be from Beatrice Street and Jandy Place. Streetscape improvements along these streets, including new street trees and a landscaped seating area along Jandy Place, would create an inviting and accessible pedestrian environment. In addition, new trees would be planted along the perimeter of the proposed building and existing office building to remain, creating a separation between that building and the existing surface parking lot to the east.

The pedestrian experience would be further enhanced by pedestrian-scale exterior lighting fixtures, which would be provided along the public areas of the Project site. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project site. Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project site and with the requirements of the LAMC. The proposed ground floor retail uses would further add to the overall pedestrian experience. In addition, as detailed in the Transportation Assessment included in Appendix K of this Draft EIR and required by Project Design Feature TR-PDF-2 in Section IV.K, Transportation, of this Draft EIR, the Project would restrict the use of the Jandy Place driveway in order to enhance safety for pedestrians on Jandy Place during lunch hours. Therefore, the Project would not conflict with Citywide Design Guideline 1.

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

Vehicular access to the Project site would be provided via one driveway, with two lanes entering and one lane exiting the garage, and one driveway along the east side of Jandy Place, with one lane in each direction, which, as previously noted, would be restricted during lunch hours to enhance pedestrian safety. In addition, the existing driveway on the north side of Beatrice Street that currently serves the building at 12541 W. Beatrice Street would remain, along with an existing driveway provided along the east side of Jandy Place at the northern end of the Project site, which would be reserved for use by service vehicles, so that all loading activities occur off-street and internal to the Project site. Furthermore, above grade parking would be screened and integrated into the new building's architecture and the landscaping along the perimeter of the Project site would further serve to integrate vehicular access and exit points into the design of the Project. Thus, the Project would not conflict with Citywide Design Guideline 2.

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

The Project would activate the street level through building design, proposed streetscape amenities, ground floor uses, and landscaping and open space improvements. The massing of the new building would be varied and offset by landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials. In addition, the Project would provide pedestrian-scaled Project frontages along Beatrice Street and Jandy Place that would incorporate ground level setbacks with landscaping and passive seating areas. Consistent with Guideline 3, the Project would avoid long blank walls and would ensure that ground floor restaurant and retail uses maintain a high degree of transparency and maximize a visual connection to the street. To accommodate the Project, the perimeter walls, fences, and dense landscaping that currently extend along

much of the western and southern boundaries of the Project site, along Beatrice Street and Jandy Place, would be removed, creating a more open, human-scaled streetscape environment. Project signage would also be appropriately scaled and aesthetically compatible with the architecture proposed for the Project site, as well as the existing architecture in the surrounding area. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Thus, overall, the Project would be designed to actively engage with streets and public space and maintain human scale and not conflict with Citywide Design Guideline 3.

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

As previously discussed, the Project design would complement the surrounding uses, which consist of commercial, office, and industrial uses immediately north, east, and west of the Project site and commercial and multi-family uses south of the Project site (across Beatrice Street). A five-level parking structure is located adjacent to the Project site's northeastern side and further east of the Project site are additional commercial and industrial uses. Building heights in the surrounding area range from one- to two-story office buildings to the five-story multi-family Avalon Playa Vista apartments and parking structure. The Project would replace the existing one-story office building and accessory structures on the western portion of the Project site with an eight-story mixed-use office building and would include landscaped courtyards and walkways to connect the proposed building with the existing office building on the eastern portion of the Project site to create an integrated creative office campus. The proposed building would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses. The massing of the new building would be varied and offset by landscaped terraces, and multiple wall planes would articulate the building façade. The building would incorporate a variety of surface materials and a stepped design to create horizontal and vertical articulation, provide visual interest, and reduce the apparent height and bulk of the building. In addition, the existing perimeter fencing and landscaping would be replaced with landscaping and streetscape amenities that would be in scale with the surroundings. Ground-level retail uses would further be in scale with the surrounding context. Thus, the Project would not conflict with Citywide Design Guideline 4.

(5) Guideline 5: Express a clear and coherent architectural idea.

The Project would integrate the new and existing buildings on the Project site, thereby creating an integrated creative office campus that would have a coherent architectural expression. The landscaped paseo that would extend between the two buildings would connect the uses and visually integrate the site. Consistent landscaping throughout the Project site and along the perimeter, the inclusion of pedestrian amenities, additional walkways and courtyards, and ground level retail uses would further integrate the site. In addition, the design of the new structure would incorporate a contemporary style

that would include distinguishable design features while respecting the aesthetic character of the surrounding area. The use of a variety of building materials would create a contemporary architectural style that would be designed to visually unify and complement the existing surrounding uses. In addition, architectural details would be incorporated on all sides of the proposed structure to enhance scale and interest on the building's façades. Consistent, pedestrian-level lighting would also be provided throughout the Project site, adding to the overall design idea. Furthermore, the proposed building would step down in size and scale, lowering in height from the existing 20-foot office building on the eastern portion of the Project site to the new construction up to 135 feet on the western portion of the Project site. Above grade parking would be screened and integrated into the new building's architecture. Specifically, the majority of the proposed vehicle parking would not be visible as it would be wrapped by the proposed commercial uses on the ground floor and would be screened using architectural screening elements and landscaping. The creative office campus would involve the new construction of a structure that has been designed with floor plates and ceiling heights varying in size by level, which may be modified to offer flexible combinations of spaces to accommodate different user needs.

All of these elements would be designed to complement the overall design of the Project site, creating a coherent architectural idea that would not conflict with Citywide Design Guideline 5.

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

The Project site is relatively flat and is located in an urbanized area. As discussed in the Initial Study included as Appendix A of this Draft EIR, a total of 61 trees are located within the Project site. The Project would involve the removal of 59 of the 61 trees located on the Project site. As the trees to be removed could potentially provide nesting sites for migratory birds, the Project would comply with the Migratory Bird Treaty Act so as to not impact special-status species or interfere substantially with the movement of any native migratory wildlife species. As such, the Project would not conflict with Citywide Design Guideline 8.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would incorporate energy-efficient design methods and technologies, including energy-efficient lighting and Energy Star-certified appliances. The Project would provide a minimum of 3,300 square feet of roof area reserved for a solar photovoltaic system in compliance with Los Angeles Green Building Code Section 95.05.211. In addition, 30 percent of the Project's parking spaces would be capable of supporting future EVSE, and 10 percent of spaces would have EV charging stations as required by City of Los Angeles

Ordinance 186,485. As such, the Project would be configured to lower energy demand and increase the comfort and well-being of users. The Project would not conflict with Citywide Design Guideline 9.

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

As described in the Drainage Technical Report prepared for the Project and included as Appendix IS-4 within Appendix A of this Draft EIR, the Project would implement Low Impact Development (LID) strategies to treat and infiltrate stormwater from a site that does not have any BMPs under existing conditions. The proposed cistern systems would reduce the runoff from the project by intercepting runoff for reuse in irrigating the Project's landscaping and terraces. Intercepting the first flush stormwater runoff removes contaminants from the runoff that would otherwise enter the storm drain system and downstream waterways. As such, introduction of LID features would result in an improvement in surface water quality runoff.

As such, the Project would support Guideline 10 by introducing green infrastructure and incorporating stormwater BMPs. The Project would not conflict with Citywide Design Guideline 10.

Based on the discussion above, the Project would not conflict with the Citywide Design Guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

*(c) Conclusion Regarding Land Use Impacts Related to Regulatory Consistency*

**Based on the analysis above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project site. Therefore, the Project would not conflict with or impede implementation of the General Plan, Community Plan, LAMC, or other applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to Threshold (b) and land use policy consistency would be less than significant.**

(2) Mitigation Measures

Impacts with regard to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.



### (3) Level of Significance After Mitigation

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

## e. Cumulative Impacts

### (1) Impact Analysis

Cumulative growth in the Project vicinity includes one specific known development project, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. This related project is a multi-family apartment development. As with the Project, this related project would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Therefore, the Project and this related project would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would not substantially conflict with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, cumulative impacts with regard to land use consistency would not be cumulatively considerable and would be less than significant.**

### (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

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