

IV. Environmental Impact Analysis

E. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would physically divide an established community and whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Specifically, Section IV.A, Air Quality, of this Draft EIR, evaluates consistency with the South Coast Air Quality Management Plan.

2. Environmental Setting

a. Regulatory Framework

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

- California Government Code Section 65302
- Senate Bill 375
- Senate Bill 743
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Hollywood Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) California Government Code Section 65302

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

(b) Senate Bill 375

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

(c) Senate Bill 743

In September 2013, Governor Edmund G. "Jerry" Brown signed SB 743, which made several changes to CEQA for projects located in areas served by transit. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(a) defines the following:

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the

site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

- “Transit priority area” means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

Although the Project Site is designated as a transit priority area (TPA) in ZIMAS, based on the identification of a major transit stop on Santa Monica Boulevard on City maps, and although the Project qualifies as an employment center project under PRC Section 21099, a review of bus headways at nearby bus stops indicates they are not frequent enough for the Project Site to be designated as a TPA.

(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 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) 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),¹ 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,² including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The 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 *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed April 16, 2021.*

² *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).*

(1) Land Use Chapter

The Framework Element's Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential 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 Framework Element's Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter recognizes that the distribution of housing in proximity to transit can reduce vehicle trips and provide residents with the opportunity to walk between their home, job, and/or neighborhood services. The Housing Chapter provides the following policies to achieve this goal through a number of measures:

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

(3) Urban Form and Neighborhood Design Chapter

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

of buildings and second, to enhance the physical character of neighborhoods and communities within the City.³ The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(4) Open Space and Conservation Chapter

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

(5) Economic Development Chapter

The Framework Element's 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.

³ *City of Los Angeles General Plan Framework, p. 5-1, et. seq.*

(6) Transportation Chapter

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

(ii) Transportation Element

The Mobility Plan, adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (Assembly Bill [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.

(iv) City of Los Angeles General Plan Housing Element

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

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

- A City committed to ending and preventing homelessness.⁴

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

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

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.

⁴ *City of Los Angeles, Los Angeles Housing Element 2021–2029, p. 242.*

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

(vi) Hollywood Community Plan

The City's Hollywood Community Plan, adopted on December 13 and readopted in 2014, which covers the Hollywood area is the land use element of the General Plan applicable to the Hollywood. The Hollywood Community Plan implements the Framework Element 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.⁶

As shown in Figure IV.E-1 on page IV.E-11, the Hollywood Community Plan's land use designation for the Project Site is Limited Manufacturing and Medium Residential, as further discussed below. As shown in Figure IV.E-2 on page IV.E-12, the Project Site has two zoning designations under the LAMC. The western half of the Project Site along Seward Street is zoned MR1-1 (Restricted Industrial, Height District 1), and the eastern portion of the Project Site along Hudson Avenue is zoned R3-1 (Multiple Dwelling, Height District 1). The Project proposes a General Plan Amendment to the Community Plan to amend a portion of the Project Site designated as Medium Residential to Limited Manufacturing to match the balance of the Project Site; a Vesting Zone Change has also been proposed to change the R3 and MR1 zones to M1 to allow for office uses across the entire Project Site; and a Height District Change from Height District No. 1 to Height District No. 2 with a D Limitation to allow for a 4.5:1 FAR.

(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.E-2, the Project Site has two zoning designations under the LAMC. The western half of the Project along Seward Street is zoned as MR1-1 (Restricted Industrial, Height District 1). The eastern half of the Project Site along Hudson Avenue is

⁶ *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update (<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>). Under the current draft released in February 2021, the properties at 1000-1006 Seward Street and 6565 Romaine Street have a proposed land use designation of Limited Industrial, with a proposed zone of [Q]M1-2D. The properties at 1003-1013 Hudson Avenue have a proposed land use designation of Medium Multiple Family. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Hollywood Community Plan.*

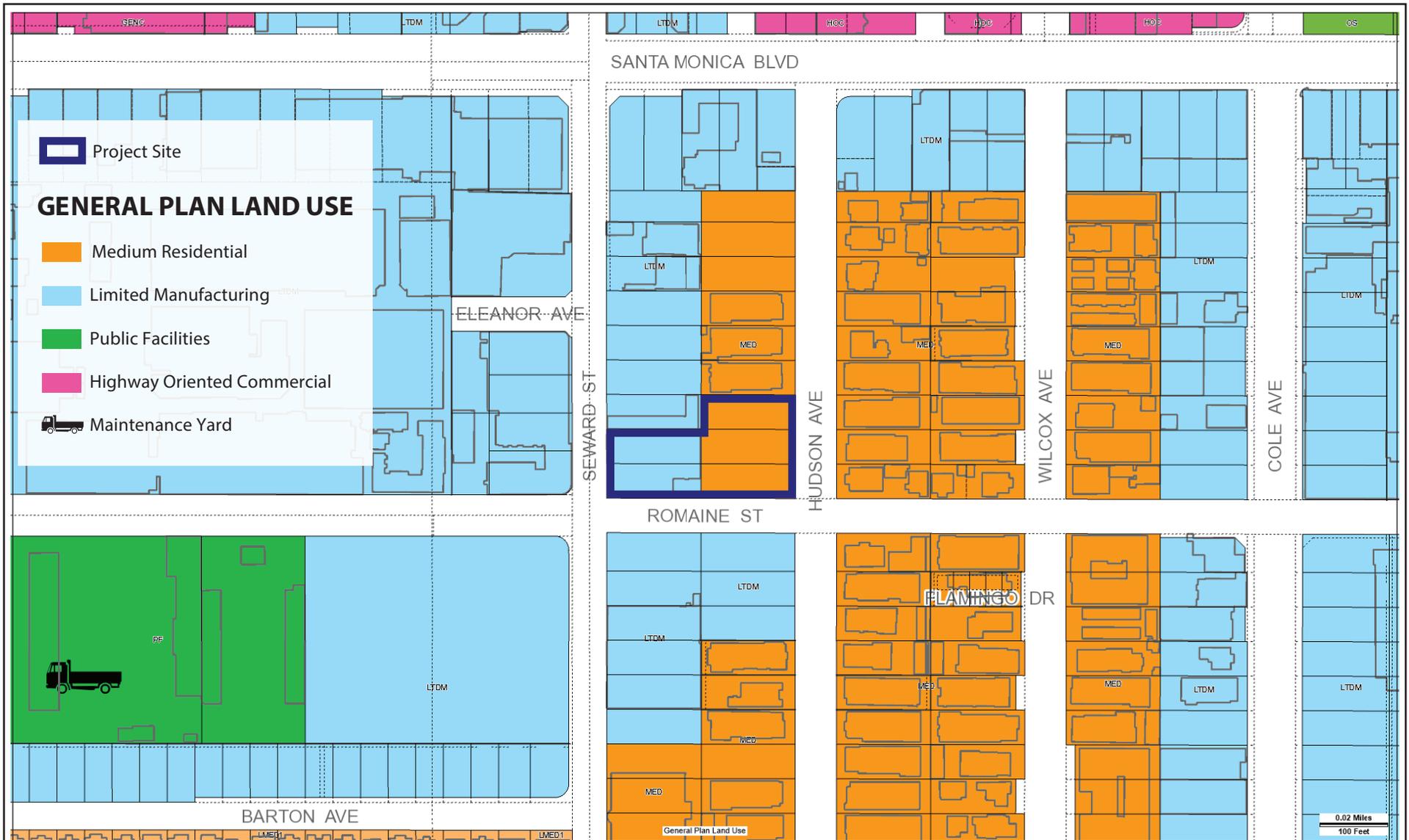


Figure IV.E-1

Land Use Designation on the Project Site



GENERALIZED ZONING

- MR1-1
- PF-1XL
- R3-1
- Project Site

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

zoned R3-1 (Multiple Dwelling, Height District 1). The MR1 Zone permits CM (commercial manufacturing) uses, including limited commercial and manufacturing, clinics, media production limited machine shops, animal hospitals, and kennels. The R3 Zone permits R2 (two-family dwellings) uses, including apartment houses, multiple dwellings, and childcare (20 children maximum) uses. The Height District 1 designation, in conjunction with the R3 Zone has a height limit of 45 feet and an FAR of 3:1. The Height District 1 designation for the MR1 Zone permits an FAR of 1.5:1 but does not impose a maximum building height limit.

As previously mentioned, the Project proposes a Vesting Zone change from R3 and MR1 to M1 to allow for office uses across the entire Project Site. The Project also proposes a Height District Change from Height District No. 1 to Height District No. 2 with D Limitation, which would allow a 4.5:1 FAR.

(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.

b. Existing Conditions

(1) Project Site

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with two one-story buildings totaling 10,993 square feet, including a 2,551 square-foot restaurant and 8,442 square-foot studio and production space and surface parking areas. Vehicular access to the Project Site is provided via driveways along

Romaine Street and Hudson Avenue. The Project Site is relatively flat with limited ornamental landscaping.

As previously discussed, and as shown above in Figure IV.E-1 on page IV.E-11, under the Hollywood Community Plan, the Project Site is currently designated as Limited Manufacturing and Medium Residential. As shown in Figure IV.E-2 on page IV.E-12, the Project Site is zoned by the LAMC as MR1-1 (Restricted Industrial, Height District 1) and R3-1 (Multiple Dwelling, Height District 1).

(2) Surrounding Uses

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is located in a highly urbanized area developed with a mix of commercial, industrial and residential uses. Land uses located adjacent to the Project Site include an approximately 64-foot-tall parking structure and multi-family residential buildings to the north; a 76-foot-tall office building and an above-grade parking structure to the west; a 76-foot-tall office/commercial building and industrial uses to the south; and multi-family residential buildings to the east.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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 factors to evaluate land use:

(1) Land Use Consistency

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

(2) Land Use Compatibility

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

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:

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

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not

obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be consistent with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

c. Project Design Features

No specific project design features are proposed with regard to land use.

d. Analysis of Project Impacts

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

As discussed in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would develop a new commercial building on the Project Site. All proposed development would occur within the boundaries of the Project Site. The proposed restaurant, retail, and office development would be consistent with the allowable uses on the Project Site and the immediate area surrounding the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. **Therefore, the Project would not physically divide the community, and impacts with respect to Threshold (a) would be less than significant.**

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

(1) Impact Analysis

(a) Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the applicable goals, objectives, and policies of the General Plan, including the Framework Element, the Mobility Plan, the Conservation Element, and the Health and Wellness Element; the Hollywood Community Plan; the Citywide Design Guidelines, and the LAMC.

(i) Los Angeles General Plan(1) City of Los Angeles General Plan Framework Element

The Project's general consistency with the applicable objectives and policies that support the goals set forth in the Framework Element is discussed in detail in Table 1 of Appendix F 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 General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(a) Land Use Chapter

The Framework Element Land Use Diagrams designate districts, centers and mixed-use boulevards. The Project Site is located in an area that is identified as a Regional Center on the Framework Element's Long Range Land Use Diagram for the City's Metro area. The Project would support and would be consistent with the Framework Element Land Use Chapter as it would contribute to the needs of the City's existing and future residents, businesses, and visitors by providing new office, restaurant, and retail uses totaling 150,600 square feet. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled (VMT), and air pollution, while supporting the City's objective to encourage new multi-family residential, retail, restaurant, and office uses along primary transit corridors/boulevards and in designated Regional Centers. In addition, by adding community-serving retail, restaurant space, and new landscaping on the ground level, the Project would promote a pedestrian-friendly environment. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

(b) Open Space and Conservation Chapter

While the Project is not required to provide residential open space, as no residential units are proposed, the Project would incorporate a variety of open space and amenities throughout the Project Site. The building would include terraces that would be located on multiple levels throughout the building and would feature outdoor dining seating, lounge seating, and landscaping. The Project would include tenant terraces on Levels 2, 4, 5, 8, 9, and the roof which would provide seating, lounge areas, and landscaping. Meanwhile, Level 10 would include a restaurant/entertainment terrace. Additional common open space would be provided on the first floor of the building and would include the plaza stairs, outdoor dining seating, new trees, and raised planters. The Project would provide approximately 33,100 square feet of open space (500 square feet of which would be a publicly accessible ground floor plaza). Furthermore, the Project would incorporate elements that promote individual and community safety throughout the Project Site,

including open space areas that are well-lit and equipped with a closed-circuit camera system to allow for constant monitoring of such areas. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter.

(c) Economic Development Chapter

The Project would support the City's objective to establish a balance of land uses through the development of retail, restaurant, and office uses in an area well-served by public transit. The proposed community-serving retail, restaurant, and office uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Hollywood Community Plan area, provide amenities to meet the needs of local residents, and serve to reduce VMT by locating jobs in an area well served by public transit. Thus, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Economic Development Chapter.

(d) Infrastructure and Public Services Chapter

The Project would support the City's policy and objectives pertaining to effective and efficient approaches to protecting water quality by implementing a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as required by the City's Low Impact Development (LID) Ordinance. Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Furthermore, as discussed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. In addition, as discussed in the Initial Study included in Appendix A, of this Draft EIR, the Project would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB); and the Los Angeles Sanitation Bureau (LASAN) has made a determination that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Infrastructure and Public Services Chapter.

(e) Conclusion

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

(2) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 2 of Appendix F of this Draft EIR.

In summary of Table 2, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

During operation, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle facilities. Specifically, the Project would include 310 vehicle parking spaces within four subterranean levels and four fully-enclosed and mechanically ventilated above grade parking levels and 58 bicycle parking spaces within the ground level parking area. The Project would also enhance pedestrian activity along Seward Street, Hudson Avenue, and Romaine Street through building design and proposed streetscape amenities by providing ground-level, community-serving retail and restaurant uses, as well as new landscaping. Streetscape amenities provided by the Project would include the plaza stairs, outdoor dining seating, new trees, and raised planters. Additionally, given the location of the Project Site in proximity to major transit corridors, the Project would provide all guests, employees, and patrons of the on-site uses convenient access to transit services. The Project would also include a Transportation Demand Management (TDM) Program pursuant to Project Design Feature TR-PDF-1 and VMT impacts would be less than significant. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan.

(3) Los Angeles General Plan Conservation Element

As identified in Subsection 2.a.(1)(a)(ii), the Conservation Element addresses the preservation, conservation, protection, and enhancement of the City's natural resources and recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Project's consistency with the Conservation Element is analyzed below.

As discussed in the Initial Study included in Appendix A of this Draft EIR, the Project Site is currently developed with two one-story buildings and a surface parking lot and does not contain any natural resources. Landscaping within the Project Site is limited to one

ornamental tree, and common grasses and shrubs. There are no street trees adjacent to the Project Site. The existing on-site tree is a non-native species that is not subject to the City of Los Angeles Protected Tree Relocation and Replacement Ordinance (Ordinance No. 177,404).⁷ As also discussed in the Initial Study included as Appendix A of this Draft EIR, due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site.

With respect to historic resources, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, the buildings on the Project Site are not considered historic resources as defined by CEQA and direct impacts would be less than significant. There are identified historic resources in the Project vicinity, including the Hollywood Center Studios which is located immediately to the west of the Project Site, and the Seward Film Vaults immediately to the north. Although the Project would introduce increased height and density to the Project Site, the Project does not include demolition, destruction, relocation, or alteration of any potential historical resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. With the implementation of Mitigation Measure CUL-MM-1 to protect the Seward Film Vaults during construction, the Project would not result in a substantial adverse change in the significance of a historic resource and indirect impacts would be less than significant.

⁷ *The City of Los Angeles Protected Tree Relocation and Replacement Ordinance (Ordinance No. 177,404) protects Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element.

(4) Health and Wellness Element

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 is in close proximity to transit including numerous bus lines and would include TDM measures to reduce VMT pursuant to Project Design Feature TR-PDF-1 (refer to Section IV.H, Transportation, of this Draft EIR). In addition, the Project would encourage alternative transportation choices by improving the pedestrian experience on adjacent streets and providing 58 bicycle parking spaces on-site. As such, the Project would support the Health and Wellness Element's efforts to reduce vehicle use through implementation of smart growth 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) Hollywood Community Plan

The Project's general consistency with the objectives and policies set forth in the Hollywood Community Plan is discussed in detail in Table 3 of Appendix F of this Draft EIR. The following is a summary of that discussion.

The Project currently has a land use designation of Limited Manufacturing and Medium Residential and is zoned MR1-1 (Restricted Industrial, Height District 1) and R3-1 (Multiple Dwelling, Height District 1). The City has initiated a General Plan Amendment to the Hollywood Community Plan to amend a portion of the Project Site designated as Medium Residential to Limited Manufacturing to match the balance of the site; a Vesting Zone Change from R3 and MR1 to M1 to allow for office uses across the entire Project Site; and a Height District Change from Height District No. 1 to Height District No. 2 with a D Limitation to allow a 4.5:1 FAR. Upon approval of the requested entitlements, the proposed uses would be consistent with those permitted under the new zoning.

The Project would not conflict with the objectives and policies that support the goals of the Community Plan. The Project would support the Hollywood Community Plan's objective to promote the economic well being and public convenience by developing new community-serving retail, restaurant, and office uses in Hollywood. The proposed uses would be located in an area well served by public transit, which would reduce VMT. The

Project would also support the Hollywood Community Plan's policy to provide new employment opportunities within a reasonable commuting distance from residential locations. The Project Site is located within proximity to residential locations, including the multi-family residential buildings to the east of the Project Site. Additionally, the Project would support the Hollywood Community Plan's policy to discourage on-street parking in industrial areas as it would include 310 vehicle parking spaces within four subterranean levels, one at-grade level, and three fully-enclosed and mechanically ventilated above-grade parking levels.

The Project would also provide 58 bicycle parking spaces (36 long term and 22 short term) and new trees around the building perimeter, which would improve the pedestrian realm. Accordingly, the Project would improve Hollywood's pedestrian environment and support bicycling, recognizing the various alternative modes of transportation available in the immediate vicinity of the Project Site.

Therefore, the Project would not conflict with the goals, objectives, and policies set forth in the Hollywood Community Plan.

(ii) Los Angeles Municipal Code

As previously discussed, the Project Site has a General Plan land use designation of Limited Manufacturing and Medium Residential and is currently zoned MR1-1 and R3-1. Pursuant to the LAMC, the MR1 Zone permits CM (commercial manufacturing) uses, including limited commercial and manufacturing, clinics, media production, limited machine shops, animal hospitals, and kennels. The R3 Zone permits R2 (two-family dwellings) uses, including apartment houses, multiple dwellings, and child care (20 children maximum) uses. The Height District 1 designation, in conjunction with the R3 Zone has a height limit of 45 feet and an FAR of 3:1. The Height District 1 designation for the MR1 Zone permits an FAR of 1.5:1, but does not impose a maximum building height limit.

The Project is a commercial development consisting of restaurant, retail, and office uses. Thus, the Project would be inconsistent with the Project Site's R3 zoning and Medium Residential land use designation which do not permit office uses. To accommodate the Project's proposed office uses, pursuant to LAMC Section 11.5.6, the Applicant is requesting a General Plan Amendment to amend a portion of the Project Site designated by the Hollywood Community Plan as "Medium Residential" land use designation to a "Limited Manufacturing" land use designation to match the balance of the Project Site. Pursuant to LAMC Sections 12.32-F and 12.32-Q, the Applicant is also requesting a Vesting Zone Change for the Project Site from "R3" and "MR1" to "M1" to allow for the office use across the entire Project Site, including the imposition of a T Classification to provide relief from the Project's dedication and improvement requirements along Romaine Street and Seward Street.

With respect to FAR, the proposed 4.4:1 FAR is also inconsistent with the Project Site's existing zoning. To allow the proposed density, pursuant to LAMC Section 12.32F, the Applicant is requesting a Height District Change for the Project Site from Height District No. 1 to Height District No. 2 with a D Limitation to allow a 4.5:1 FAR. The Project would also require a Site Plan Review pursuant to LAMC Section 16.05 to allow development that creates, or results in an increase of 50,000 gross square feet or more nonresidential floor area.

In accordance with LAMC Section 12.24-W,1, the Applicant would also seek a Conditional Use Permit to allow the sale or dispensing for consideration of alcoholic beverages, including beer, wine, and a full-line of alcohol, for consumption on the premises or off-site of the premises in the M1 Zone (for up to three suites).

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

(iii) Citywide Design Guidelines

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

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

The Project would enhance the streetscape adjacent to the Project Site along Seward Street, Hudson Avenue, and Romaine Street by implementing a variety of measures that would encourage pedestrian activity and activate the public realm. The Project would provide eight street trees along Romaine Street and Hudson Avenue, which would provide shade for pedestrians. In addition, the Project would include low-lumen exterior lights adjacent to the buildings and along pathways that would serve to enhance the safety of pedestrians at night. The Project would also include pedestrian-accessible, ground floor commercial uses that would be designed with articulation and window treatments that would enhance the streetscape and the pedestrian plaza at the corner of Seward Street and Romaine Street would be accessible to both patrons and the general public. These Project elements would provide additional pedestrian amenities for the community and provide a safe, comfortable, and accessible pedestrian experience for all.

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

The Project would include the removal of existing surface parking within the Project Site. All Project parking would be located within four subterranean levels, one at-grade level that would be enclosed with the exception of the entrance, and three fully-enclosed and mechanically ventilated above grade parking levels. Driveways and parking areas would be unobtrusive as the only curb cut is a single two-lane driveway on Hudson Avenue that provides access to building's parking levels. The number of curb cuts would be reduced on the Project Site from five to one. Thus, the parking garage and driveways would not be highly visible from surrounding areas, which would serve to enhance the pedestrian environment.

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

There are currently no street trees adjacent to the Project Site. The Project would include eight street trees along Romaine Street and Hudson Avenue, which would provide shade for pedestrians. As such, the Project would provide a balance between landscaping and paved areas used by the public, as well as Project employees and patrons of the retail and restaurant uses located on the ground floor of the Project. Furthermore, the retail and restaurant uses would be designed with glass windows, evoking a sense of connection between the visible interior and the open space where people may sit, eat, or socialize.

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

The Project would provide open space and recreational amenities for employees throughout the Project Site. The Project would include terraces that would be located on multiple levels throughout the building and would feature outdoor dining seating, lounge seating, and landscaping. The Project would also provide tenant terraces on Levels 2, 4, 5, 8, 9, and the roof which would provide seating, lounge areas, and landscaping; and a restaurant/entertainment terrace would be provided on Level 10. Additional common open space would be provided on the first floor of the building and would include the plaza stairs and outdoor dining seating. Thus, the Project would provide amenities that support community building and provide an inviting and comfortable user experience.

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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green

Building Code and CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project's sustainability features would include, but would not be limited to the following: photovoltaic cells; electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design.

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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system, capture and use system, biofiltration/bioretenion system, or a combination of these as required by the City's LID Manual.

(b) SCAG 2020–2045 RTP/SCS

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 4 of Appendix F to this Draft EIR. As detailed therein, the Project would be generally consistent with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project also includes adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking.

(c) Conclusion

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

adopted to mitigate or avoid and environmental effect. Therefore, the Project would not be in substantial conflict with relevant environmental policies in applicable plans. As such, impacts related to land use consistency would be less than significant.

(2) Mitigation Measures

The Project's impact 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

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

e. Cumulative Impacts

(1) Impact Analysis

(a) Physically Divide a Community

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 16 related projects in the vicinity of the Project Site as well Related Project No 17, the Hollywood Community Plan Update. The related projects generally consist of infill development and redevelopment of existing uses. As such, similar to the Project, the proposed construction associated with the related projects would be confined to the related project sites and would not physically divide a community. The uses proposed by the related projects, including multi-family residential, commercial, office, and hotel uses would also be compatible with the various developments planned throughout Hollywood as well as with existing uses. **As such, cumulative impacts related to the physical division of a community would be less than significant.**

(b) Conflict with Applicable Goals, Objectives, and Policies Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

As with the Project, the related projects which consist of infill development and redevelopment of existing uses and consist of multi-family residential, commercial, office, and hotel uses would be required to comply with relevant land use policies and regulations. Therefore, as with the Project, the related projects would not conflict with applicable land use plans. Specifically, like the Project, related projects would be required to comply with certain regulations and City goals, objectives, and policies to reduce emissions during construction as well as using clean materials and energy efficient appliances, consistent

with the City's Green Building Code. In support of the City's goal to reduce vehicle miles traveled, it is anticipated that related projects would also implement various methods to promote alternative modes of transportation, including providing bicycle parking spaces, which is a City requirement. **Overall, cumulative impacts related to conflict with land use plans would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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