

Appendix F
**Land Use Plans and Policies:
Project Consistency Tables**

TABLE LU-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS AND STRATEGIES OF THE 2020–2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Goal/Strategy	Would the Project Conflict?
Goals	
Encourage regional economic prosperity and global competitiveness.	<p>No Conflict. This goal pertains to SCAG funding and policies. The Project would not adversely affect the capacity to encourage regional economic prosperity and global competitiveness. As the Project does provide regional economic benefits and does so in a manner consistent with other 2020-2045 RTP/SCS goals as discussed below, and within a high-quality transit area (HQTA), the Project would support SCAG choices regarding this goal.</p>
Improve mobility, accessibility, reliability, and travel safety for people and goods.	<p>No Conflict. The Project Site is located within a Transit Priority Area (TPA), which is defined by the Public Resources Code as an area within 0.5 miles of an existing or planned major transit stop.</p> <p>Bus and light rail service is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT). The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo neighborhoods with the rest of downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.</p> <p>The Project Site is also located within walking distance (less than 0.4 miles) of the Metro Regional Connector Little Tokyo/Arts District station that is currently under construction and scheduled to be open and operational in 2022. The Regional Connector Project extends the Metro L Line from the Little Tokyo/Arts District Station to the 7th Street Metro Center Station in downtown Los Angeles, allowing passengers to transfer to Metro’s A Line, E Line, B Line and D Lines, bypassing Union Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District. Three new transit stations will be developed with operation of the Metro Regional Connector. The closest new transit station will be located at 1st Street and Central Avenue, less than 0.4 miles north of the Project Site.</p> <p>With proximity to a range of transit options and designation as a TPA site, the Project would improve mobility, accessibility, reliability, and travel safety for people and goods.</p>
Enhance the preservation, security, and resilience of the regional transportation system.	<p>No Conflict. The proximity of the Project Site to numerous alternative transit modes, including regional and local bus lines as well as the regional transit, would support the region’s</p>

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Goal/Strategy	Would the Project Conflict?
	transportation investment and the sustainability of the regional transportation system.
Increase person and goods movement and travel choices within the transportation system.	No Conflict. The Project, which is located in an HQTAs and designated TPA, would provide a high-density multi-family and commercial mixed-use development in an area served by local and regional bus lines and a regional Metro station. The high-density character of the Project and proximity to transit facilities would support an increase in person and goods movement and increase the available travel choices within the transportation system.
Reduce greenhouse gas emissions and improve air quality.	No Conflict. The Project Site is located within a SCAG-defined HQTAs and TPA; SCAG encourages redevelopment and growth within TPA areas. The Project would provide 145 short-term bicycle parking spaces and 595 long-term bicycle parking spaces. The Project would include sidewalk widening and improvements, block-to-block paseos, publicly accessible open space, pedestrian-oriented landscaping, and lighting that would encourage pedestrian activity. The support of cycling and pedestrian access and availability of public transit would reduce vehicle miles traveled and, thus, reduce both criteria pollutants and greenhouse gas emissions. In addition, the Project would be designed to achieve the USGBC LEED Gold equivalent, inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Building Code 2019. The Project’s sustainability features such as electric vehicle (EV) charging, EV capable, and EV ready spaces would also serve to reduce greenhouse gas emissions and improve air quality.
Support healthy and equitable communities.	No Conflict. As noted above, the Project would implement design features to reduce air quality impacts, including compliance with the 2019 CalGreen Code and Los Angeles Green Building Code (refer to Sections IV.A, <i>Air Quality</i> , and IV.E, <i>Greenhouse Gas Emissions</i> , of this Draft EIR). The Project would provide 1,521 residential units, including affordable housing units and work/live units; 163,325 sf of private open space and 90,113 sf of publicly accessible open space. The Project’s design features reduce greenhouse gas emissions and the provision of open space and affordable residential units would support a healthy and equitable community.

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Goal/Strategy	Would the Project Conflict?
Adapt to changing climate and support an integrated regional development pattern and transportation network.	No Conflict. The Project would provide a high-density mixed residential/commercial use within a designated TPA in an area served by local and regional bus lines and Metro transit. The Project would also provide 145 short-term bicycle parking spaces and 595 long-term bicycle parking spaces. The Project’s accessibility to numerous alternative transportation facilities and provision of bicycle facilities would support an integrated regional development pattern and transportation network that would reduce GHG emissions.
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No Conflict. This goal pertains to SCAG leveraging new transportation technologies and data-driven solutions that result in more efficient travel. The Project, which would increase residential and commercial density in proximity to transit within a SCAG-defined HQTAs would not conflict with SCAG’s ability to develop more efficient travel.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. The Project would provide up to 1,521 high-density residential units, including affordable housing units and work/live units, in an area supported by multiple transportation options. The Project would, thus, not conflict with SCAG’s goal to encourage the development of diverse housing types in an area with multiple transit options.
Promote conservation of natural and agricultural lands and restoration of habitats.	No Conflict. As detailed in the Initial Study, provided in Appendix A of this Draft EIR, the Project Site does not contain agricultural uses or related operations, nor is the Project Site located within a designated riparian habitat or support suitable habitat for candidate, sensitive, or special status species; as such, the development of the Project would not conflict with this goal to promote conservation of natural agricultural lands and restoration of habitats.
Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	No Conflict. The Project is a high-density residential/commercial use located within a TPA. The Project is also located within walking distance of the Los Angeles Civic Center and other high-density areas within downtown Los Angeles. The proximity of the Project to multiple bus lines and a regional Metro line within the center of the metropolitan area would facilitate multimodal access to work, educational facilities, and other destinations. With the introduction of a high-density land use in proximity to a range of transit options, the Project would emphasize land use patterns that facilitate multimodal access to work, educational and other destinations throughout the City.

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Goal/Strategy	Would the Project Conflict?
Plan for growth near transit investments and support implementation of first/last mile strategies.	No Conflict. The Project Site is 100 feet from the LADOT Downtown Area Short Hop (DASH) Route A and 0.4 miles from the Metro Regional Connector Little Tokyo/Arts District Station and, as such, would support growth near transit investments. The 2020-2045 RTP/SCS recommends an increase in the number of trips accomplished by walking, bicycling and the use of micro-mobility devices to reduce automobile vehicle miles traveled (VMT) (2020-2045 RTP/SCS, page 69). These strategies include building physical infrastructure such as local and regional bikeways, sidewalk and safe routes to schools, pedestrian improvements, regional greenways and first-last mile connections to transit. According to the 2020-2045 RTP/SCS, these strategies would also improve air quality and public health by reducing emissions and increasing levels of physical activity. Because of its proximity to transit, the Project would encourage walking between the transit corridor and the Project Site. In addition, with public access to the Project’s open space, the Project would encourage walking between the Project Site and the surrounding neighborhoods. Because the Project would facilitate use of transit and walking, it would be consistent with RTP/SCS first/last mile strategies to shift vehicle trips to walking or transit. Thus, the Project would not conflict with the 2020-2045 RTP/SCS strategy to reduce VMT, reduce air emissions, and improve public health. Therefore, the Project would not conflict with the goal to plan for growth near transit investments and support implementation of first/last mile strategies.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	No Conflict. The Project would represent an infill development within a HQTAs that would increase amenities, including public amenities, and connectivity in the existing area. As an infill use, it would not result in urban sprawl or other effects that would conflict with the objectives of the 2020-2045 RTP/SCS to reduce VMT and improve air quality. Therefore, the Project would not conflict with policies that prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	No Conflict. The Project would implement a transportation demand management (TDM) program to reduce the Project’s single occupancy vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. The TDM program may include, but would not be limited to reduced parking supply, parking cash-out, bicycle share station(s), bicycle parking facilities, and an integrated pedestrian network within and adjacent to the Project Site that is transit, bike, and pedestrian

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Goal/Strategy	Would the Project Conflict?
	friendly. Therefore, the Project would not conflict with strategies that encourage design and transportation options that reduce the reliance on and number of solo car trips.
Support Implementation of Sustainability Policies	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	<p>No Conflict. The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.</p> <p>The Project would investigate the use of local low carbon materials and Environmental Product Declaration (EPDs) to promote the City’s green material economy by using the “Buy Clean California Act” (AB 262) as a reference and resource.</p> <p>The Project would use tree landscaping for passive solar shading and use cool roof/pavement coatings to reduce the urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. The Project would focus on occupant wellness by incorporating healthy materials with low-volatile organic compounds (VOCs), abundant daylight, and accessible thermal comfort control to prevent sick building syndrome. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and dedicated on-site recycling areas.</p> <p>Pursuant to the City’s Electric Vehicle Parking Ordinance, 30 percent of the Project’s total parking spaces would be designated as EV spaces capable of supporting future electric vehicle supply equipment (EVSE) and 10 percent of the total number of spaces would be Electric Vehicle Charging Stations (EVCS). The Project would include approximately 729 bicycle parking spaces. Approximately 140 of the total spaces would be short-term spaces, with the remaining 589 spaces designated as long-term bicycle parking spaces. The Project’s bicycle parking spaces and facilities would be provided at various locations throughout the Project Site and would include lockers, fix-it/repair stations and showers. The support of electric vehicles and cycling would reduce vehicle trips and, thus, air emissions that could lead to climate change. Therefore, the Project would not conflict with strategies that support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change.</p>

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Goal/Strategy	Would the Project Conflict?
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	No Conflict. The Project would provide 408 new trees throughout the Project Site, as well as incorporate green roof terraces and cool roof coatings to combat any heat island effect. All of the Project’s landscaping and green roof terraces would use water-saving native plantings and contribute to passive cooling strategies and enhanced biodiversity. The Project would also comply with applicable solar installation regulatory requirements. Therefore, with the implementation of green roofs, tree landscaping that would provide passive solar shading, and other energy reduction measures, the Project would not conflict with policies to support renewable energy and reduction of heat islands and carbon sequestration.
Promote more resource efficient development focused on conservation, recycling and reclamation.	No Conflict. All outdoor areas would include sustainable landscaping that is native or climate-adapted. The proposed buildings would comply with Title 24 and the City of Los Angeles Green Building Code. Design features would include energy conservation, water conservation, waste reduction features, and pedestrian- and bicycle-friendly site design. The Project would include ENERGY STAR-rated appliances and install energy efficient boilers, heaters and air conditioning systems. The building layouts would be designed to minimize solar heat gain, including optimal window to wall ratio in the residential units. The Project would also comply with applicable solar installation regulatory requirements. Passive shading provided by trees throughout the Project Site would further reduce solar exposure and reduce cooling energy loads. Therefore, the Project would not conflict with policies to promote more resource efficient development focused on conservation, recycling and reclamation.
Preserve, enhance and restore regional wildlife connectivity	No Conflict. The Project Site does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s). The Project Site is currently almost entirely impermeable and there are no existing landscaped areas within the Project Site. Nonetheless, the Project would provide more native habitat (trees and shrubs) than under existing conditions. The presence of additional trees/shrubs and green cover on the Project Site would allow for the movement of wildlife through the Project Site and provide habitat for migratory bird species. As such, the Project would not conflict with strategies to preserve, enhance and restore regional wildlife connectivity.

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Goal/Strategy	Would the Project Conflict?
Reduce consumption of resource areas, including agricultural land	No Conflict. The Project Site is located within an entirely urban site in downtown Los Angeles. Development in this area would allow for the Project’s mixed use urban development and publicly accessible open space uses without the consumption of any existing resource areas or agricultural land. Therefore, the Project would not conflict with strategies to reduce consumption of resource areas, including agricultural land.
Identify ways to improve access to public park space	No Conflict. The Project would provide approximately 90,113 square feet of publicly accessible open space, including plazas, pocket parks within the North and South Sites, and paseos passing between Central Avenue and Alameda Street. Although this would not change access to off-site public parks, it would enhance the area’s open space opportunities. Because the Project would provide numerous new outdoor spaces for public use, it would not conflict with strategies to identify ways to improve access to public park space.

SOURCE: ESA, 2023.

TABLE LU-2
COMPARISON OF THE PROJECT TO APPLICABLE GOALS, OBJECTIVES AND POLICIES
OF THE GENERAL PLAN FRAMEWORK ELEMENT INTENDED TO AVOID OR MITIGATE AN
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Goal, Objective or Policy	Would the Project Conflict?
Land Use Chapter	
<p>Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</p>	<p>No Conflict. The Project would replace existing surface parking and cold storage facility uses by developing high quality new buildings with 1,521 residential units, including affordable housing units; approximately 411,113 sf of office uses; approximately 101,088 sf of restaurant/retail uses¹; and, 68 hotel rooms that would contribute to the City's long-term economic viability. The Project is located within a primarily industrial area and not adjacent to an existing residential neighborhood. As such, the Project would not cause the removal of any existing residential units or encroach into established residential neighborhoods.</p> <p>The Project would provide on-site open space and recreational facilities for residential uses and approximately 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. As such, the Project would not create a high demand on public resources such as parks and, thus, would not result in a non-equitable distribution of public resources.</p> <p>The Project would conserve natural resources by meeting LEED Gold Certification and implementing sustainability features. Sustainability features to be incorporated into the Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; tree landscaping to provide passive solar shading and use cool roof/pavement coatings to reduce the urban heat island effect; EV charging, EV capable and EV ready spaces and bicycle facilities that would meet or exceed the respective city codes; Energy Star-labeled appliances; energy-efficient and water conserving HVAC systems; active fresh circulation and adequate daylight through plazas and paseos throughout the Project Site.</p> <p>The Project would provide adequate infrastructure and public services by improving sidewalks needed for public access and would install or upgrade as necessary utility lines serving the</p>

¹ The 101,088 square feet restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 13,024 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, Environmental Impact Analysis, of this Draft EIR, evaluates a total of 114,112 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,846 square feet of restaurant uses.

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Goal, Objective or Policy	Would the Project Conflict?
	<p>Project Site. The public sidewalks along Central Avenue, 4th Street, Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree lined sidewalks. Public sidewalks would be approximately 15 feet in width (varying from 10 to 16 feet) along the Project’s street frontages.</p> <p>The Project would be located in a TPA within walking distance (less than 0.4 mile) of the Metro Regional Connector Little Tokyo/Arts District station that is currently under construction and is scheduled to be operational in 2022. The proximity of transit would reduce the need for vehicle use and reduce traffic congestion.</p> <p>As discussed in Sections IV.B, <i>Air Quality</i>, IV.E, <i>Greenhouse Gas Emissions</i>, IV.G, <i>Noise</i>, and IV.J, <i>Transportation</i>, of this Draft EIR, the Project would not cause adverse air quality, traffic, or operational noise impacts on the surrounding area that would result in environmental justice or unhealthful living impacts to the surrounding uses or to the City. As such, the Project would not conflict with policies to improve air quality, enhance open space opportunities, assure environmental justice and a healthful living environment for a more livable city.</p>
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors.</p>	<p>No Conflict. The Project would accommodate a diversity of uses by providing residential, office, retail, and hotel uses on a currently underutilized property within downtown Los Angeles. Locally, the Project Site is in a highly urbanized area and situated on the eastern border of the Central City East District, which is largely developed with general commercial and manufacturing uses such as wholesale, warehouse, and food processing facilities. Alameda Street, which borders the Project Site to the east, separates the Central City East District of the Central City Community Plan from the Arts District. The Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City’s Downtown area and has experienced an increased demand for new retail, hotel, creative office, and residential spaces. Therefore, the Project would support the needs of the City’s existing and future businesses and visitors within an area adjacent to the emerging Arts District.</p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City’s population and businesses with the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p>No Conflict. The Project Site is within the boundaries of the designated “Downtown Center” in the Framework Element’s Metro Los Angeles Geographical Area Long-Range Land Use Diagram. The Downtown Center is described in the Framework Element as an international center for finance and trade that serves the population of the five-county metropolitan region. As discussed in the Framework Element, the Downtown Center is the largest government center in the region and the location for major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise</p>

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Goal, Objective or Policy	Would the Project Conflict?
	residential towers, and regional transportation facilities. According to the Framework Element, the Downtown Center is generally characterized by a floor area ratio up to 13:1 and high-rise buildings. The Project, which consists of mid- and high-rise residential/office/hotel/ and restaurant/retail uses is served by regional transit would be consistent with the Framework Element’s objectives for the Downtown Center. Therefore, the Project would not conflict with the Framework Element’s mapped patterns of use and with this land use policy.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	No Conflict. The Project Site is a 7.6-acre property within an urbanized area. The Project Site is located within a City-defined TPA and SCAG-defined HQTAs, in which redevelopment and growth is encouraged. The Project would include approximately 729 bicycle parking spaces and supporting amenities. Approximately 140 of the total spaces would be short-term spaces, with the remaining 589 spaces designated as long-term bicycle parking spaces. The support of bicycling would reduce vehicle trips and, thus, air emissions that could lead to climate change. With the location of this use within an existing developed area, and in proximity to transit, which would facilitate a reduction of vehicle trips, the Project would not conflict with policies that provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations	No Conflict. The Project is located on an infill property in urban Los Angeles. The Project is located a few blocks to the south of Little Tokyo and the Los Angeles Civic Center, and other highly urbanized districts within downtown Los Angeles. Because of its central location and walking/biking distance to a range of services, restaurants, offices, and transit, the Project would encourage pedestrian and bicycle access between uses. The Project Site is also within a designated TPA, defined by the Public Resources Code as an area within 0.5 miles of an existing or planned major transit stop. The Project would provide a total of 140 short-term bicycle parking spaces and 589 long-term bicycle parking spaces and is in proximity to various bike lanes/routes. Because of these facilities and proximity to the range of services and uses in downtown Los Angeles, the Project would not conflict with policies to provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
Objective 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City’s stable residential neighborhoods and	No Conflict. The Project Site, which is located in downtown Los Angeles, is a highly urbanized infill location currently occupied by warehousing and parking. The Project’s multi-story buildings would be consistent with the multi-story, mixed use character of downtown Los Angeles and the nearby Little

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Goal, Objective or Policy	Would the Project Conflict?
enhance the character of commercial and industrial districts.	Tokyo/Arts District neighborhoods and would not encroach into any existing residential neighborhoods. The architectural design, variety of building heights and architectural treatment, mix of uses, provision of street-to-street paseos, and substantial publicly accessible, landscaped open space would enhance the character of the Project Site and surrounding commercial/industrial area. Therefore, the Project would not conflict with policies that provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.
Objective 3.3: Accommodate projected population and employment growth in accordance with the Framework Citywide Long-Range Land Use Diagram and forecasts in Table 2-2, using these in the formulation of the community plans and as the basis for the planning for and the implementation of infrastructure improvements and public services.	No Conflict. The Project would intensify residential and commercial development within the Downtown Center, consistent with the land use objectives of Figure 3-1, Metro Los Angeles Geographical Area Land Use Diagram. As such, the Project would not conflict with the Framework Element's long-term objectives with respect to patterns of development and long-range land use for the area.
Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures in accordance with the Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies 3.16 through 3.16.3.	No Conflict. The Project would not conflict with policies 3.16 through 3.16.3 in the siting and configuration of buildings, which would promote pedestrian activity with publicly accessible plazas and block-to-block paseos passing through the Project Site; ground floor retail uses; outdoor dining areas, and outdoor art markets. Parking would be for the most part located within subterranean structures and enclosed podiums. As such, the Project would not conflict with Policy 3.8.4
Policy 3.9.7: Provide for the development of public streetscape improvement, where appropriate.	No conflict. Pedestrian activity would be promoted by sidewalk improvements; street trees; pocket parks; landscaping along the paseos and sidewalks; and street-level retail uses. The Project would provide 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. As such, the Project would not conflict with the policy to provide for public streetscape improvement.
Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.	No Conflict. The Project Site is located within walking distance (less than 0.4 miles) of the Metro Regional Connector's Little Tokyo/Arts District Station at 1 st Street and Central Avenue and is located within a designated TPA. The Project Site is located within the designated Downtown Center in a primarily industrial area. No low-density residential neighborhoods are within the vicinity of the Project Site. Thus, and the Project would not encroach into any low-density residential neighborhoods. The Project type and location would not conflict with policies to

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Goal, Objective or Policy	Would the Project Conflict?
	locate new development around urban transit stations and to preserve low density neighborhoods.
Urban Form and Neighborhood Design Chapter	
Policy 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.	No Conflict. The Project would improve safety and surveillance by providing lighting along open space walkways, in the parking garages and in entrance areas for security and wayfinding purposes. The ground floor retail will provide “eyes on the street” and the Project Site would be monitored by CCTV cameras, as well as on-site security staff. Therefore, the Project would not conflict with policies that facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, good visual connections between the Project’s residential, commercial, and publicly accessible environments.
Open Space and Conservation Chapter	
Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	No Conflict. The Project would be developed within an existing developed industrial and commercial area and is not in proximity to any natural settings. Development of the Project Site would remove existing cold storage facility uses on the West and South Sites, and a single-story warehouse building on the North Site and surface parking lots. No natural resources would be impacted. Further the Project would plant 408 new trees throughout the Project Site thus, adding a sustainable environment within an area largely devoid of such resources. Therefore, the Project would not conflict with policies that protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.
Policy 6.1.2: Coordinate City operations and development policies for the protection and conservation of open space resources by: <ul style="list-style-type: none"> a. Encouraging City departments to take the lead in utilizing water re-use technology, including graywater and reclaimed water for public landscape maintenance purposes and other such purposes as may be feasible; and b. Preserving habitat linkages, where feasible, to provide wildlife corridors and to protect natural animal ranges. 	No Conflict. The Project would collect, filter, and store surface water runoff in accordance with the City’s Low Impact Development (LID) Ordinance to improve the quality of stormwater entering the City’s existing drainage system and the Los Angeles River, approximately 0.5 miles to the east of the Project Site. In addition, the Project’s landscaping program, which would include 408 climate-adapted trees, would enhance nesting opportunities for any urban wildlife, such as birds, migrating through the area. Therefore, the Project would not conflict with policies that coordinate City operations and development policies for the protection and conservation of open space.

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ENVIRONMENTAL EFFECT**

Goal, Objective or Policy	Would the Project Conflict?
<p>Objective 6.2: Maximize the use of the City’s existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.</p>	<p>No Conflict. By developing publicly accessible open space and pocket parks within an urbanized, downtown area with convenient geographic access to parks and plazas within the nearby Civic Center and Little Tokyo communities, the Project would serve as a link in the Downtown’s existing open space network. In addition, with the Project’s access to transit and increase in population density, and existing connections to regional parks and open space, such as Griffith Park and the beaches, the Project would not conflict with policies that maximize the use of the City’s existing open space network and recreation facilities.</p>
<p>Policy 6.2.1: Establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.</p>	<p>No Conflict. The Project would contribute to the City’s open space system by providing 90,113 sf of publicly accessible, landscaped open space and paseos for passive recreational uses. As such, the Project would provide connections to adjacent land use uses, although no portions of the linear open space system represented in the Citywide Greenways Network map is immediately near the Project Site. Therefore, the Project would not conflict with policies to establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.</p>
<p>Objective 6.3: Ensure that open space is managed to minimize environmental risks to the public.</p>	<p>No Conflict. The Project’s publicly accessible open space would be maintained and surveilled by the Project operator to reduce risks to the public. Landscaping would be maintained to reduce risks from tree breakage, landscaping pesticides, and other potential risks to the public. The Project Site would be monitored 24 hours a day, seven days a week by CCTV and security personnel. Open spaces would be well-lit during hours of public use to increase safety. Therefore, the Project would not conflict with policies to ensure that open space is managed to minimize environmental risks to the public.</p>
<p>Policy 6.4.8.b: Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of “unbuildable” areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.</p>	<p>No Conflict. The Project would provide 90,113 sf of publicly accessible, landscaped open space and street-to-street paseos and, thus, increase open space within the Central City East neighborhood of the Central City Community Plan area. Therefore, the Project would not conflict with policies that encourage the improvement of open space, both on public and private property.</p>

**TABLE LU-2
COMPARISON OF THE PROJECT TO APPLICABLE GOALS, OBJECTIVES AND POLICIES
OF THE GENERAL PLAN FRAMEWORK ELEMENT INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT**

Goal, Objective or Policy	Would the Project Conflict?
Economic Development Chapter	
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	No Conflict. The Project Site is located in a designated TPA and within 0.4 mile of Metro Regional Connector Little Tokyo/Arts District Station that is currently under construction and is scheduled to be operational in 2022. The Project Site is also served by LADOT DASH Route A, with an existing stop at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site and Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D in the vicinity. The Project’s mix of uses would intensify development in proximity to rail and bus transit facilities and, as such, the Project would not conflict with policies to encourage new commercial development in proximity to rail and bus transit corridors and stations.
Public Facilities and Infrastructure Chapter	
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.	No Conflict. The Project would contribute to the City’s stormwater management system by capturing surface water runoff in accordance with the City’s LID Ordinance. Water would be filtered and reused to irrigate onsite landscaping. Unused, filtered water would be released into the City’s stormwater system. Filtered stormwater would outlet at the Los Angeles River, 0.5 miles to the east of the Project Site. (Please refer to the <i>Hydrology and Water Quality Report</i> contained in Appendix A, Initial Study, of this Draft EIR). With implementation of best management practices (BMPs) and other LID measures, the Project would not conflict with policies regarding stormwater management that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.
Objective 9.5: Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.	No Conflict. The Project’s compliance with the LAMC’s LID regulations that require a stormwater collection system to retain stormwater runoff would reduce impacts on the City’s stormwater collection system. The LID measures would also reduce any flooding effects from the Project Site to surrounding uses. Therefore, the Project would not conflict with policies to ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.

**TABLE LU-2
COMPARISON OF THE PROJECT TO APPLICABLE GOALS, OBJECTIVES AND POLICIES
OF THE GENERAL PLAN FRAMEWORK ELEMENT INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT**

Goal, Objective or Policy	Would the Project Conflict?
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	No Conflict. Under the Project, there would be an increase in stormwater permeability, which would decrease the amount of surface runoff. In addition, the Project Site does not currently have BMPs for the management of runoff. As such, the Project's BMPs would further reduce stormwater runoff and decrease the amount of stormwater runoff discharging into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, the water quality of stormwater would be improved compared to existing conditions. Therefore, the Project would not conflict with policies to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.

SOURCE: ESA, 2023.

TABLE LU-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
OPEN SPACE ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE
AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Goals	
<p>To ensure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City</p>	<p>No Conflict. The Project would provide 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The provided open space would increase the City’s open space resources and contribute to the recreational, health, and safety needs of the City. Therefore, the Project would not conflict with policies to ensure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City.</p>
<p>To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public</p>	<p>Conflict. The Project Site is currently developed with cold storage facility uses and surface parking areas. The Project Site is devoid of any open space areas containing unique natural features and scenic areas. The six-story brick building on the North Site, referred to as the LACS Building, includes a West Volume and an East Volume. The LACS Building was originally constructed in the early 1900s and is identified by SurveyLA as an individual historical resource. The Project would demolish the East Volume and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 through CULT-MM-8 in Section IV.B, <i>Cultural Resources</i>, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 through CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. Thus, the Project would conflict with this goal pertaining to the conservation of historic resources.</p>
<p>To conserve and/or preserve those open space areas containing the City’s environmental resources including air and water</p>	<p>No Conflict. The Project Site is currently developed with cold storage facility uses and surface parking areas. The Project Site is void of any open space areas. The Project’s landscaping program (including 408 new trees) and 90,113 sf of publicly accessible open space would expand upon the City’s open space resources. In addition, the Project’s LID system would filter and, thus, improve the quality of surface water (stormwater) runoff from the Project Site. The Project would contribute to the conservation of the City’s water resources and, therefore, would not conflict with policies to conserve and/or preserve those open space areas containing the City’s environmental resources including air and water.</p>

TABLE LU-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
OPEN SPACE ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE
AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Objectives	
<p>To establish standards for the location, quantity, quality, conservation and preservation of open space</p>	<p>No Conflict. The Project would add 90,113 square feet of publicly accessible, landscaped open space within a highly urbanized area and currently developed with warehouses and surface parking. As such, the Project would contribute the City open space resources and would not conflict with policies to establish standards for the location, quantity, quality, conservation and preservation of open space.</p>
<p>To identify unique natural features, scenic areas and historical sites that are desirable for preservation</p>	<p>Conflict. The intent of the objective is to identify unique natural features, scenic areas and historical sites that are desirable for preservation. No natural features or scenic areas are located within the Project Site. However, the LACS Building on the North Site was originally constructed in the early 1900s and is identified by SurveyLA as an individual historical resource. The LACS Building includes a West Volume and an East Volume. The Project would demolish the East Volume and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 through CULT-MM-8 in Section IV.B, <i>Cultural Resources</i>, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 through CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. Thus, the Project would conflict with this goal pertaining to the preservation of historic resources.</p>
<p>To identify, preserve and/or conserve those lands necessary as open space land in order to protect the public health and safety</p>	<p>No Conflict. The purpose of this policy is to identify, preserve, or conserve lands as open space to protect public health and safety. The Project Site is currently devoid of any open space resources. The Project would plant 408 climate adapted trees throughout the Project Site and would provide 90,113 square feet of publicly accessible open space. As such, the Project serve as a private open space resources. The Project would include full-time, on-site security and lighted public walkways and open space areas. As such, the Project would contribute to public health and safety related to the use of its open space component. Therefore, the Project would not conflict with policies identify, preserve and/or conserve those lands necessary as open space land to protect the public health and safety.</p>

**TABLE LU-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
OPEN SPACE ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE
AN ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
<p>Policies</p> <p>Subdivision and zoning regulations should provide standards emphasizing natural and topographic values and constraints through: density/intensity limitations, establishment of access standards; availability of public services; consideration of natural hazards; employment of aesthetic as well as safety aspects of grading, and environmental preservation. This is especially important with respect to preservation of vegetative cover and minimization of sheet erosion.</p>	<p>No Conflict. The Project’s LID system would collect and filter stormwater prior to discharging from the Project Site, which would prevent sheet erosion to any exposed areas within or surrounding the Project Site. The Project would maximize vegetative cover by providing sod, 408 new climate-adapted trees, additional landscaping, and 90,113 square feet of public open space within the Project Site. The Project Site is not characterized by natural or topographic values (hillsides or natural open space). However, because the Project Site is currently occupied by warehouses and surface parking, the open space components of the Project would contribute to the City’s natural value. Therefore, the Project would not conflict with policies related to subdivision and zoning regulations that provide standards emphasizing natural and topographic values and constraints through: density/intensity limitations, establishment of access standards; availability of public services; consideration of natural hazards; employment of aesthetic as well as safety aspects of grading, and environmental preservation.</p>

SOURCE: ESA, 2023.

TABLE LU-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
CONSERVATION ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Section 3, Archaeological and Paleontological Resources	
<p>Objective: Protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.</p>	<p>No Conflict. While no known archeological or paleontological resources are known to exist within the Project Site, there is the potential for such resources to be encountered during Project construction activities. The Project would be required to implement Mitigation Measures ARCH-MM-1 to ARCH-4 in Section IV.B, Cultural Resources, and Mitigation Measures PAELO-MM-1 to PALEO-MM-3 in Section IV.D, <i>Geology and Soils</i>, of this Draft EIR. The mitigation measures address inadvertent discovery and recovery of archaeological or paleontological resources, if encountered during construction activities, and would reduce potentially significant impacts to such resources to a less than significant level. The recovery of such resources would promote future research and educational opportunities. Therefore, the Project would not conflict with policies that protect the city's archaeological, paleontological, or historical resources for historical, cultural, research and/or educational purposes.</p>
<p>Policy: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification.</p>	<p>No Conflict. As discussed under the Objective immediately above, the Project would not conflict with policies that continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification.</p>
Section 8, Erosion	
<p>Objective: Protect the coastline and watershed from erosion and inappropriate sedimentation that may or has resulted from human actions.</p>	<p>No Conflict. During construction, the Project would implement stormwater BMPs to reduce erosion on-and off-site. During operation, the Project's LID system would collect, filter, and store stormwater from the Project Site, which currently flows untreated into the Los Angeles River. With the implementation of BMPs and LID measures, the Project would reduce inappropriate sedimentation from releasing into the Los Angeles River watershed. Therefore, the Project would not conflict with policies that protect the watershed from erosion and inappropriate sedimentation that may or has resulted from human actions.</p>

TABLE LU-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
CONSERVATION ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Section 12, Habitats	
<p>Objective: Preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages so as to enable the healthy propagation and survival of native species, especially those species that are endangered, sensitive, threatened or species of special concern.</p>	<p>No Conflict. The Project Site is currently void of any significant habitat supporting sensitive wildlife species. The Project Site does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s). The Project would provide new native habitat (trees and shrubs) which does not occur under existing conditions. The presence of additional trees/shrubs and green cover on the Project Site would allow for the movement of wildlife through the Project Site and provide habitat for migratory bird species. Therefore, the Project would not conflict with policies to preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages so as to enable the healthy propagation and survival of native species, especially those species that are endangered, sensitive, threatened or species of special concern.</p>

SOURCE: ESA, 2023.

**TABLE LU-5
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE CENTRAL CITY COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
Residential	
<p>Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.</p> <p>Policy 1-2.1 Promote the development of neighborhood work/live housing.</p> <p>Objective 1-3: To foster residential development which can accommodate a full range of incomes.</p>	<p>No Conflict. The Project would include 1,521 residential units, including affordable housing units. The Project would set aside 5 percent of the total rental units for extremely low-income households. In addition, between 11% and 40% of the total units will be set aside for very low, low, or moderate income households. Therefore, the Project would not conflict with policies to increase the range of housing choices available to downtown Los Angeles employees and residents.</p> <p>No Conflict. The Project would provide 8 live/work units within Buildings 7 and 9. These would be supported by a protected, pedestrian-only “Makers Alley” where artisans would be able to present goods manufactured on-site. Therefore, the Project would not conflict with policies to promote the development of neighborhood work/live housing.</p> <p>No Conflict: As described in Chapter II, <i>Project Description</i>, of this Draft EIR, the Project would provide a range in size of residential units at varied rates contributing to the overall housing stock available within the City and accommodating a full range of household incomes. Therefore, the Project would not conflict with policies to foster residential development which can accommodate a full range of incomes.</p>
Commercial	
<p>Objective 2-1: To improve Central City’s competitiveness for offices, business, retail, and industry.</p>	<p>No Conflict: The Project would provide approximately 411,113 sf of office uses; approximately 101,088 sf of restaurant/retail uses²; and 68 hotel rooms. The Project would provide 90,113 square feet of publicly accessible open space featuring landscaping, public art, outdoor boutiques, and high-quality architectural design that would generate public interest and enhance the Central City Community Plan area’s commercial competitiveness. Therefore, the Project would not conflict with policies to improve Central City Community Plan area’s competitiveness for offices, business, retail, and industry.</p>

² The 101,088 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 13,024 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count toward the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, Environmental Impact Analysis, of this Draft EIR, evaluates a total of 114,112 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,846 square feet of restaurant uses.

TABLE LU-5
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE CENTRAL CITY COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
<p>Policy 2-2.3 Support the growth of neighborhoods with small, local retail services.</p> <p>Objective 2-4: To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.</p>	<p>No Conflict: The Project would provide 101,088 square feet of restaurant/retail space that would serve the needs of Project and nearby residents.³ Further, the retail space would contribute to the pedestrian friendly ground level retail milieu that provides a coherent set of support businesses for residential development within the area. Therefore, the Project would not conflict with policies to support the growth of neighborhoods with small, local retail services.</p> <p>No Conflict: The Project’s restaurant/retail businesses, hotel use, street-to-street paseos, 12 curated publicly accessible open spaces, and dining areas would enliven neighborhood activity beyond the standard workday and support a more active nightlife activity. Therefore, the Project would not conflict with policies to encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.</p>
Open Space and Recreation	
<p>Objective 4-1: To encourage the expansion and additions of open spaces as opportunities arise.</p> <p>Objective 4-4: To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.</p>	<p>No Conflict: While privately provided, the Project’s 90,113 square feet of ground level publicly accessible open space with streetscape, landscaping, and public art would provide direct open space uses on the Project Site for the public benefit and would contribute to the overall flow of open space within the emerging local Project vicinity. Therefore, the Project would not conflict with policies to encourage the expansion and additions of open spaces as opportunities arise.</p> <p>No Conflict: The Project Site, which is a designated TPA and served by a variety of mobility options, is located within walking distance of major transit options, including the Metro Regional Connector Little Tokyo/Arts District Station that is currently under construction and scheduled to be open and operational in 2022. The Project would include 12 individually curated publicly accessible open space areas, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The open space design would capitalize on proximity to transit and other cultural resources within the nearby Arts District. Therefore, the Project would not conflict with policies to encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs</p>

³ The 101,088 square feet restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 13,024 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, Environmental Impact Analysis, of this Draft EIR, evaluates a total of 114,112 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,846 square feet of restaurant uses.

TABLE LU-5
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE CENTRAL CITY COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Police Protection	
<p>Policy 5-2.1: Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.</p>	<p>No Conflict: The Project would include design features to enhance safety around the Project Site, as well as provide private security on the Project Site. As such, the Project would complement the provision of police services and reduce demand of services by the Los Angeles Police Department (LAPD). Access points would be limited and located in areas of high visibility. Outdoor areas would be exposed to windows and allow for natural surveillance, interior and exterior spaces would be well lit with proper signage to direct flow of people and decrease opportunities for crime, building access/design would be secured to residential areas (access key cards), building entryways and Plazas would be well-lit, staff would be trained in safety and sound security policies, entrances and exits of the building would be monitored, security camera surveillance would be provided, and trained personnel would provide assistance to residents and visitors with Project Site access. By reducing demand for police services, existing facilities can better support the needs of the Community, while avoiding the construction of new police facilities. Therefore, the Project would not conflict with policies to promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.</p>
Historical Buildings	
<p>Objective 10-2: To maintain and reuse one of the largest and most distinguishes sets of under used historic buildings in the United States.</p> <p>Policy 10-2.6: Encourage the reuse of historic buildings as live/work, offices, housing, retail, and educational facilities.</p>	<p>Conflict. The six-story brick building on the North Site, referred to as the LACS Building, includes a West Volume and an East Volume. The LACS Building was originally constructed in the early 1900s and is identified by SurveyLA as an individual historical resource. The Project would demolish the East Volume and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 through CULT-MM-8 in Section IV.B, <i>Cultural Resources</i>, of this Draft EIR. However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 through CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. Thus, the Project would conflict with this objective/policy pertaining to the reuse of historic resources.</p>

TABLE LU-5
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE CENTRAL CITY COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Transportation	
<p>Objective 11-1. To keep downtown as the focal point of the regional mobility system accommodating internal access and mobility needs as well.</p> <p>Policy 11-1.1 Encourage rail connections and High Occupancy Vehicle (HOV) lanes that will serve the downtown traveler.</p>	<p>No Conflict. The Project would locate a high intensity development, including 1,521 residential units; 411,113 sf of office uses; 101,088 sf of restaurant/retail uses⁴; and 68 hotel rooms within downtown Los Angeles and a designated TPA. This high concentration of development would keep the downtown as a focal point of the regional mobility system and the Project’s proximity the Metro Regional Connector Little Tokyo/Arts District Station as well as bus lines. In addition, a TDM program to be implemented under the Project, which would encourage the use of rail connections and high occupancy vehicles, as discussed in Section IV.J, <i>Transportation</i>, of this Draft EIR. Therefore, the Project would not conflict with policies to keep downtown as the focal point of the regional mobility system accommodating internal access and mobility needs as well or encourage rail connections and HOV lanes that will serve the downtown traveler.</p>
<p>Objective 11-4. To take advantage of the district’s easy access to two mass transit rail lines, the freeway system, and major boulevards that connect Downtown to the region.</p>	<p>No Conflict. The Project would create a higher concentration of land uses, as well as associated residents and employees within a TPA (walking distance from the mass transit) near downtown Los Angeles’ newly connected transit, via the Metro Regional Connector Little Tokyo/Arts District Station discussed in Table LU-1, above, and in proximity to the surrounding freeway system and major boulevards. Therefore, the Project would not conflict with policies to take advantage of the district’s easy access to two mass transit rail lines, the freeway system, and major boulevards that connect downtown Los Angeles to the region.</p>
<p>Objective 11-6. To accommodate pedestrian open space and usage in Central City</p>	<p>No Conflict. The Project would provide 90,113 square feet of ground level public open space with streetscape, landscaping, street-to-street paseos between Central Avenue and Alameda Street. The provided open space would encourage pedestrian activity and use. Therefore, the Project would not conflict with policies to accommodate pedestrian open space and usage in Central City.</p>

SOURCE: ESA, 2023.

⁴ The 101,088 square feet restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 13,024 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of 114,112 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,846 square feet of restaurant uses.

TABLE LU-6
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OF THE CENTRAL INDUSTRIAL DISTRICT REDEVELOPMENT PROJECT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Section 105: Project Goals and Objectives	
<p>Goal: Elimination of conditions of blight and deterioration within the Project Area and prevention of the establishment of new blight through the removal of structures, removal of incompatible uses, rehabilitation of deteriorated structures and structures requiring modernization for appropriate use, and redevelopment of underutilized and vacant parcels, where appropriate.</p>	<p>No Conflict. The Project would redevelop existing cold storage buildings and surface parking to a high-quality mixed-use development with thoughtfully designed buildings and open space, including publicly accessible plazas, paseos, landscaping, street improvements. And the introduction of 408 climate-adapted trees. If feasible, the Project would adaptively reuse a portion of the onsite 6-story cold-storage building originally constructed in the early 1900s and identified by SurveyLA as an individual historical resource, to provide new restaurant/retail uses and residential amenities; thus, preventing the building’s further deterioration. Therefore, the Project would not conflict with policies to eliminate conditions of blight and deterioration within the Project Area and to prevent the establishment of new blight through the removal of structures, removal of incompatible uses, rehabilitation of deteriorated structures and structures requiring modernization for appropriate use, and redevelopment of underutilized and vacant parcels, where appropriate.</p>
<p>Goal: A safe and secure environment for businesses, employees, residents and visitors, and which is sustainable by the Central Industrial community as a whole.</p>	<p>No Conflict. The Project would enhance the safety and security of the Project Site and surrounding area through the presence of residents (occupants of 1,521 on-site residential units); office, retail, and hotel employees; and visitors. The Project design would facilitate observation and natural surveillance through common areas, adequate lighting, clear definition of outdoor spaces, and visual connections between the Project’s residential, commercial, and publicly accessible environments. The Project would improve safety and surveillance by providing lighting along open space walkways, in the parking garages and in entrance areas for security and wayfinding purposes. The Project Site would be monitored by CCTV cameras, as well as on-site security staff. Therefore, the Project would not conflict with policies to provide a safe and secure environment for businesses, employees, residents and visitors, and which is sustainable by the Central Industrial community as a whole that would reduce impacts on police services within the community.</p>
<p>Goal: A modern circulation system which is responsive to the needs of semi-trailer and truck movement and loading operations, and the needs of businesses, employees, residents, and visitors.</p>	<p>No Conflict. All of the Project’s loading operations associated with semi-trailer and truck movements would be conducted within dedicated loading areas within the Project Site. Separate dedicated passenger drop and delivery areas would be located throughout the Project Site so as to not conflict with truck movements or pedestrian activities. Therefore, the Project would not conflict with policies to provide a modern circulation system which is responsive to the needs of semi-trailer and truck movement and loading operations, and the needs of businesses, employees, residents, and visitors.</p>

TABLE LU-6
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OF THE CENTRAL INDUSTRIAL DISTRICT REDEVELOPMENT PROJECT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
<p>Goal: Development and rehabilitation of structures to meet all code requirements of the City of Los Angeles, guided by urban design, land use and development standards that promote compatibility of industrial, commercial, and housing uses and which preserves historic resources in the community.</p>	<p>Partial Conflict. The six-story brick building on the North Site, referred to as the LACS Building, includes a West Volume and an East Volume. The LACS Building was originally constructed in the early 1900s and is identified by SurveyLA as an individual historical resource. The Project would demolish the East Volume and possibly adaptively reuse the West Volume of the LACS Building, if it is determined to be structurally capable of adaptive reuse, per Mitigation Measures CULT-MM-1 through CULT-MM-8 in Section IV.B, <i>Cultural Resources</i>, of this Draft EIR. The Project’s structures and rehabilitation of the historic building on the North Site, if feasible, would meet all code requirements of the City, and would be guided by urban design, land use and development standards that promote compatibility of industrial, commercial, and housing uses and which preserves historic resources in the community</p> <p>However, for purposes of this Draft EIR and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire LACS Building on the North Site. Therefore, with full removal of the LACS Building, or even if the West Volume is adaptively reused per Mitigation Measures CULT-MM-1 through CULT-MM-8, the Project would result in a significant and unavoidable impact to a historic resource, the LACS Building. Thus, the Project would partially conflict with this goal pertaining to the preservation of historic resources.</p>
<p>Goal: Sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability.</p>	<p>No Conflict. The Project would support sustainable development. The Project’s buildings would be designed to meet LEED Gold certification standards. The Project would comply with the City’s EV Parking requirements of 30 percent of total parking spaces to be designated as EV spaces capable of supporting future EVSE and 10 percent of the total number of spaces to be EVCS. The Project would provide on-site short and long-term bicycle parking. The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment. The Project would use cool roof/pavement coatings to reduce the urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. The Project would focus on occupant wellness by incorporating healthy materials with low-VOCs, abundant daylight, superior interior lighting quality, and accessible thermal comfort control to prevent sick building syndrome. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and provide dedicated on-site recycling areas.</p>

TABLE LU-6
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OF THE CENTRAL INDUSTRIAL DISTRICT REDEVELOPMENT PROJECT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
	Therefore, the Project would not conflict with policies to provide sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability.
Goal: Open space, parks, and cultural, recreational and educational facilities for the enjoyment of employees, residents, and visitors.	No Conflict. The Project would incorporate 163,325 sf of common and private open space for on-site residential users. Of this, approximately 105,218 sf would be outdoor and rooftop common open space, approximately 25 percent (a minimum of 26,305 sf) would be landscaped. In addition, the Project would provide approximately 90,113 sf of publicly accessible open space within a total of 12 individually curated publicly accessible open space areas. Publicly accessible uses would consist of paseos, plazas, and pocket parks. Amenities provided throughout the open space area would include trees, landscape, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). Therefore, the Project would not conflict with policies to provide open space, parks, and cultural, recreational and educational facilities for the enjoyment of employees, residents, and visitors and would support air quality objectives to improve the region's air quality.

NOTE: As further clarified by the CRA/LA in a memorandum dated June 21, 2012, the land use designation for any property in a Project Area set forth in the Redevelopment Plan Map and the corresponding land use regulations shall defer to and are superseded by the underlying General Plan, Community Plan, and Zoning Ordinance land use designations and regulations.

SOURCE: ESA, 2023.