

IV. Environmental Impact Analysis

I. 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.

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
- California Coastal Act of 1976
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- LA Metro 2028 Vision Plan
- City of Los Angeles General Plan
- Community Plans (Land Use Element of the General Plan)
 - Central City Community Plan
 - Central City North Community Plan
 - Silver Lake–Echo Park–Elysian Valley Community Plan
 - Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

- North East Los Angeles Community Plan
- Boyle Heights Community Plan
- North Hollywood–Village Valley Community Plan
- Sun Valley–La Tuna Canyon Community Plan
- Arleta–Pacoima Community Plan
- Granada Hills–Knollwood Community Plan
- Sylmar Community Plan
- Encino–Tarzana Community Plan
- West Los Angeles Community Plan
- South Los Angeles Community Plan
- Southeast Los Angeles Community Plan
- Palms–Mar Vista–Del Rey Community Plan
- Westchester–Playa–Del–Rey Community Plan
- Van Nuys–North Sherman Oaks Community Plan
- West Adams–Baldwin Hills–Leimert Community Plan
- Wilshire Community Plan
- Los Angeles Municipal Code

(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's greenhouse gas (GHG) emissions reduction 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 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) California Coastal Act of 1976

The California Coastal Act of 1976 was enacted as a comprehensive scheme to govern land use planning for the entire coastal zone in the State in a manner that protects the state's natural and scenic resources, protects the ecological balance of the coastal zone, and ensures that existing and future development is consistent with the policies of Coastal Act. (Pub. Res. Code § 30001.) Under the Coastal Act, any development in the coastal zone must obtain a coastal development permit. Chapter 3 of the Coastal Act constitutes the standards for the permissibility of proposed developments subject to the Coastal Act. These policies are listed at Public Resources Code Section 30200 through Section 30265.5.

(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, the 2020-2045 RTP/SCS' "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. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a 5-percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by 9 percent, increase in work-related transit trips by 2 percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016–2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTAs)¹ by 6 percent and the share of new job growth in HQTAs by 15 percent.

(b) Metro 2028 Vision Plan

The Metro 2028 Vision Plan (Vision Plan) is the agency-wide strategic plan for Metro that creates the foundation for transforming mobility in Los Angeles County (County).² The Vision Plan establishes the mission, vision, and goals that will guide the agency's other specific plans, such as its LRTP and NextGen Bus Study. The Vision Plan addresses the root cause of LA County's transportation problem: population and economic growth are increasing travel demand on a system that is inadequately meeting the needs of its users. It states that the current system is congested because roadway space is inefficiently used: limited street space is largely given over to single occupancy vehicles, which are too often stuck in traffic, while the most disadvantaged members of our community are confined to a patchwork of transportation options that frequently fail to meet their basic mobility needs. The Vision Plan explains that improved mobility in the County can be achieved by prioritizing the movement of people over vehicles. This means using the limited street space more effectively and giving people higher-quality options for getting around, regardless of how they choose to travel. The Vision Plan aims to create high-quality alternatives to solo driving so that individuals have reliable, convenient, and safe options for taking transit, walking, biking, sharing rides, and carpooling. By better managing roadway capacity, more efficient goods movement and greater mobility for all users will

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

² *LA Metro, Metro Vision 2028 Plan, 2018.*

occur. The Vision Plan also articulates a set of principles that Metro will apply in making decisions and conducting business.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan),³ 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,⁴ 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 Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(1) Land Use Chapter

The Framework Element 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

³ *City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed June 1, 2022.*

⁴ *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).*

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) 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 Framework Element through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.⁵ 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.

(3) Open Space and Conservation Chapter

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

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

(4) Economic Development Chapter

The Framework Element 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.

(5) Transportation Chapter

The Framework Element 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 Framework Element 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.

(6) Infrastructure and Public Services Chapter

The Framework Element 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) Mobility Plan 2035

Mobility Plan 2035 (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates “complete streets” principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

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

- 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) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City’s General Plan, provides high-level policy vision, along with measurable objectives and

implementation programs to elevate health as a priority for the City's future growth and development.⁶ Through a new focus 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.

(v) Community Plans

The Site Locations for the TCN Structures are located within the Central City, Central City North, Silver Lake–Echo Park–Elysian Valley, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass, Northeast Los Angeles, Boyle Heights, North Hollywood–Village Valley, Sun Valley–La Tuna Canyon, Arleta–Pacoima, Granada Hills–Knollwood,

⁶ *City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015.*

Sylmar, Encino–Tarzana, West Los Angeles, South Los Angeles, Southeast Los Angeles, Palms-Mar Vista-Del Rey, Westchester-Playa-Del-Rey, Van Nuys-North Sherman Oaks, West Adams-Baldwin Hills-Leimert, and Wilshire Community Plan areas (Community Plans) and are generally designated and zoned as commercial, public facilities, and manufacturing uses. No site locations are zoned for residential use. These Community Plans implement the Framework Element and include land use designations, density limits, building heights and other provisions to implement development that supports the City’s policies and development vision for the future. The Project’s consistency with the applicable goals, objectives, and policies in these Community Plans adopted for the purpose of avoiding or mitigating an environmental impact is discussed in the impact analysis below. This summary discussion is supported by a detailed list of the goals, objectives, and policies of the Community Plans applicable to the Project is provided in Table 6 of Appendix I of this Draft EIR, along with an analysis of the Project’s consistency with each particular goal, objective, or policy.

(vi) Specific Plans

Aligned with the goals of the General Plan and Community Plans, a Specific Plan “houses” additional development regulations for applicants to follow to achieve the goals of the General Plan. A Specific Plan may be general, setting forth broad policy concepts, or detailed, providing direction to every facet of development: the type, design, location, and intensity of uses. In Los Angeles, there are more than 50 Specific Plans. The proposed Site Locations are located within 10 Specific Plans, including the Alameda District, Central City West, West Los Angeles Transportation Improvement and Mitigation Plan, Exposition Corridor Transit Neighborhood Plan, Los Angeles Coastal Transportation Corridor, Los Angeles International Airport Plan (LAX), South Los Angeles Alcohol Sales, Vermont/Western Station Neighborhood Area Plan, Cornfield/ Arroyo Seco, and Crenshaw Corridor. Of these, the Central City West, West LA Transportation Improvement Mitigation Plan, Exposition Corridor Transit Neighborhood Plan, LA Coastal Transportation Corridor, the Vermont/Western Station Neighborhood Plan, Cornfield Arroyo Seco, and Crenshaw Corridor Specific Plans have language that explicitly prohibits either pole signs, off-site commercial signage, or both.

(b) Los Angeles Municipal Code

Development activity within the City 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 described in Section III., Environmental Setting, of this Draft EIR, the Project includes various locations and zoning designations throughout the City.

The LAMC regulates all aspects of building development in the City, including aesthetic aspects, such as lighting and signage. Article 4.4 of the LAMC regulates signs within the City. These regulations address various signage types, prohibited sign types, prohibited locations, maintenance, hazards to traffic as determined by LADOT, and freeway exposure. These regulations are not applicable to signs located primarily within a public right-of-way. With regard to lighting, Section 14.4.4 E of these regulations require that “No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.”

Article 3 of the LAMC also provides for Specific Plan—Zoning and Supplemental Use Districts. Within this Article, Section 13.11 provides for the establishment of “SN” Sign Districts in areas of the City, the unique characteristics of which can be enhanced by the imposition of special sign regulations designed to enhance the theme or unique qualities of that district, or which eliminate blight through a sign reduction program. Each “SN” Sign District shall include only properties in the C or M Zones, with some specified limited exceptions. The development regulations for each “SN” Sign District shall be determined at the time the district is established. The sign regulations shall enhance the character of the district by addressing the location, number, square footage, height, light illumination, hours of illumination, sign reduction program, duration of signs, design and types of signs permitted, as well as other characteristics, and can include murals, supergraphics, and other on-site and off-site signs. However, the regulations for a “SN” Sign District cannot supersede the regulations of an Historic Preservation Overlay District, a legally-adopted specific plan, supplemental use district or zoning regulation needed to implement the provisions of an approved development agreement.

b. Existing Conditions

(1) Project Location

The Site Locations are located within property owned and operated by Metro along freeways and major streets, within the City. Some of the Site Locations contain existing static displays. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. Further, the proposed sites are used primarily for Metro operations, which include rail corridors, stations, parking, bus depots, and equipment lots. The Site Locations are located within 20 Community Plans and are generally designated and zoned as commercial, public facilities, and manufacturing uses. No Site Locations are zoned for residential use, although some are near residential uses. For aerial images of these Site Locations, refer to Figures III-1 through III-9 in Section III, Environmental Setting, of this Draft EIR.

The City has an approximate land area of 478 square miles (297,600 acres) with a population of nearly four million residents in 2020. The City lies within Los Angeles County, which encompasses 4,000 square miles, 88 incorporated cities, and more than 10 million residents.⁷ The City is divided into 15 City Council Districts and 35 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

Commercial zoning within the City is typically concentrated along major thoroughfares due to economic and mobility access, as well as to provide a buffer between residential uses and major commercial and industrial areas. Residential zoning is the predominant zoning classification throughout the City. Industrial zoning is concentrated in strategic nodes throughout the City and is generally buffered by commercial uses to provide separation from residential uses.

The City has roughly 8,000 off-premise signs within its boundaries, the vast majority of which are static signs, with a large majority located along surface streets. These off-premise signs are predominantly along commercial and industrial thoroughfares, with roughly 500 signs located on residentially zoned properties. The vast majority of these off-premise signs pre-date the City's ban on new off-premise signs, which was enacted in 2002. The ban on new off-premise signs also prohibits conversion of existing signs to digital displays, and any new off-premise sign must be within an adopted Sign District, Specific Plan, or Supplemental Use District, which precludes the ability to place signage on residentially zoned properties. The City currently has approximately 15 adopted Sign Districts though not all allow for off-premise signs. Adopted Sign Districts are generally scattered throughout the City.

(2) Surrounding Uses

The Site Locations are adjacent to freeways and major roadways on Metro-owned properties. The majority of the Site Locations are within Metro property used primarily for Metro operations including rail corridors, stations, parking areas, bus depots, and equipment lots. The Site Locations are within commercial/industrial areas, where there is a mix of uses, such as manufacturing, warehouse, retail, studios, storage, and surface parking, although some may be near or adjacent to residential uses.

⁷ *United States Census Bureau Quick Facts, City and County of Los Angeles, 2020, Census.gov/quickfacts/US, accessed April 4, 2022.*

3. Project Impacts

a. Thresholds of Significance

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

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

Threshold (b): Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

For this analysis, the Appendix G Thresholds listed above are relied upon.

b. Methodology

CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the Project and applicable general plans, specific plans, and regional plans. Separately, Appendix G of the CEQA Guidelines recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, 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. As provided in CEQA Guidelines Section 15126.2 “an EIR shall identify and focus on the significant effects of the proposed project on the environment.” An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment. ...if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine

consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies.⁸ Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

c. Project Design Features

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The TCN Structures would be constructed on a 10-foot by 10-foot area, and, therefore, the area of disturbance for each TCN Structure would be minimal. In addition, the Project does not include buildings or large infrastructure improvements (such as a freeway) that could divide the existing surrounding community. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

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

(1) Impact Analysis(a) *Consistency with State and Regional Plans(i)* *The California Coastal Act of 1976*

As summarized above, the Coastal Act was enacted as a comprehensive scheme to govern land use planning for the entire coastal zone in the State in a manner that protects the state's natural and scenic resources, protects the ecological balance of the coastal

⁸ Office of Planning and Research (OPR), *State of California General Plan Guidelines (2017)*.

zone, and ensures that existing and future development is consistent with the policies of Coastal Act. (Pub. Res. Code § 30001.) Based on the City's ZIMAS website platform, Site Locations FF-29 and FF-30 appear to be located within the coastal zone and therefore, are subject to Chapter 3 of the Coastal Act which includes the standards for the permissibility of proposed developments. These policies are listed at Public Resources Code Section 30200 through Section 30265.5.

As shown in the photographs provided in Figure IV.A-8 of Section IV.A, Aesthetics of this Draft EIR, Site Locations FF-29 and FF-30 are located on Metro-owned property immediately adjacent to the SR-90 Freeway and are within a chain link fenced area. Light poles and streetlights are located in close proximity to these Site Locations and a mobile Caltrans building is located near Site Location FF-30. The areas where these Site Locations have been proposed have been previously graded. As discussed in Section IV.C, Biological Resources, of the Draft EIR, these Site Locations occur approximately 150 feet from the northeastern edge of the Ballona Wetlands, within an area mapped as non-wetland habitat. Site Location FF-29 is separated from the Ballona Wetlands by the SR-90 Freeway off-ramp and Site Location FF-30 is separated from the Ballona Wetlands by the SR-90 Freeway and the off-ramp. As discussed in Section IV.A, Aesthetics, of this Draft EIR, given the orientation of the digital displays to the SR-90 and the size of the displays, public views of the displays would primarily be from the SR-90 Freeway. In addition, given the location and size of the two TCN Structures, the intermittent and transitory views of the Ballona Wetlands from the SR-90 and other more distant public locations would be obstructed on a limited basis. Thus, potential impacts to views of the scenic resources, including the Ballona Wetlands, would be less than significant. Additionally, as described above, Site Locations FF-29 and FF-30 are located on vacant land with limited vegetation and are in fenced off Metro-owned property, inaccessible to the public, and immediately adjacent to the SR-90. Public access along Culver Boulevard would not be impeded during construction or operation of the two Site Locations. Therefore, Site Locations FF-29 and FF-30 would not interfere with the public's right of access to the sea. As such, overall, the Project would not conflict with the applicable goals of the Coastal Act. Refer to Table 1 of Appendix I for a more detailed discussion of the Project's consistency with the applicable policies of the Coastal Act.

(ii) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in detail in Table 2 of Appendix I of this Draft EIR. As detailed therein, the Project would be generally consistent with the whole of 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, including increasing the travel choices within the transportation system by

creating advertising that would be utilized by both Metro and the City to fund new and expanded transportation programs. The TCN Structures would incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. The TCN Program would also improve bus passengers' experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders by displaying public transit information on the TCN Structures. Further, the Project would leverage new transportation technologies and data-driven solutions that result in more efficient travel through integration of Metro's Regional Integration of Intelligent Transportation Systems (RIITS), which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies, including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. The TCN Program would also assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. Therefore, the Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS.

(iii) South Coast Air Quality Management District Air Quality Management Plan

As analyzed in Section IV.B, Air Quality, of this Draft EIR, the Project would not conflict with the applicable policies set forth in the SCAQMD's AQMP. Refer to the discussion therein.

(iv) LA Metro 2028 Vision Plan

The Project's general consistency with the applicable goals and initiatives set forth in the Vision Plan are discussed in detail in Table 3 of Appendix I of this Draft EIR. The Project would support Initiative 1.2, to improve the County's overall transit network and assets, as well Goal 2, to deliver outstanding trip experiences for all users of the transportation systems. Specifically, the Project would integrate Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies, including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. The TCN Program would also assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to

increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. Further, the TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passenger's experience by helping to facilitate transit signal priority and bus wi-fi and efficiently relay bus arrival time information to riders by displaying public transit information on the TCN Structures. Therefore, the Project would not conflict with the applicable goals and initiatives set forth in the Vision Plan.

(b) Local Plans and Applicable Policies

As discussed in Section II, Project Description, of this Draft EIR, the Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures. The Zoning Ordinance would not authorize new signage other than the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. The Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City. Based on the above, the anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures on the proposed Site Locations described above and in this Chapter 3, as well as the take-down approximately 200 static displays located within the City. As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing off-premise static displays. Signage to be removed would include, at minimum approximately 200 off-premise static displays located within the City of Los Angeles. The Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City.

The following discussion addresses the Project's consistency with the requirements and policies of the Vision Plan, General Plan Framework Element, Conservation Element, Mobility Plan 2035, and Community Plans that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Los Angeles General Plan

(1) Los Angeles General Plan Framework Element

The Project'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 4 of Appendix I of this Draft EIR. Provided below is a summary of the discussion included in Table 4 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 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. As discussed further below, Site Locations are located within 20 Community Plan areas and are generally designated and zoned as commercial, public facilities, and manufacturing uses. No Site Locations are zoned for residential use.

Additionally, as detailed in Table 4 of Appendix I of this Draft EIR, the Project would support and would be consistent with the Land Use Chapter as it would contribute to or not conflict with the City's goal for a physically balanced distribution of land uses that facilitates 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, and assurance of environmental justice and a healthful living environment. In particular, the TCN Program would provide a network of digital displays strategically located throughout the City and would not change the distribution of land uses. Further, the TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would support a decrease in VMT, reduction of traffic congestion, and improvement of air quality. The Project would also further the City's objective to work with developers and Metro to incorporate public-serving uses and services in structures located in proximity to transit stations. The TCN Program would assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. The TCN Structures would also incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

(b) Urban Form and Neighborhood Design Chapter

The Project would promote the City's goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project by contributing to the overall livability of the City. The Project would further the City's goal of a livable City for existing and future residents and one that is attractive to future investment by developing a TCN Program that would create advertising revenue to be utilized by both Metro and the

City to fund new and expanded transportation programs. Additionally, the TCN Program would be designed to support future innovations, such as autonomous vehicles, smart energy grids, and high-speed wireless cameras. The Project would further implement Objective 5.9 of this Chapter regarding safety by encouraging proper design and effective use of the built environment to help increase personal safety by having the ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. Further, the TCN Program would be incorporated into the alert information for the freeway messaging system and major arterial network for the region, including Earthquake Early Warning System information, as well as Amber Alerts. Therefore, the Project would not conflict with the applicable objective that supports the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

(c) Open Space and Conservation Chapter

As discussed in Table 4 of Appendix I of this Draft EIR, one of the policies of the Open Space and Conservation Chapter is to seek new opportunities for private development to enhance the open space resources of the neighborhoods. The Project would not conflict with this policy as the Site Locations are located on limited footprints incontiguous throughout the City. Further, the majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. Additionally, the Site Locations are used primarily for Metro operations, which include rail corridors, stations, parking, bus depots, and equipment lots. Therefore, as detailed in Appendix I of this Draft EIR, 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 promote the City's goals, objectives, and policies of the Economic Development Chapter, including the City's goal to have a fiscally stable City by developing a TCN Program that would create advertising revenue to be utilized by both Metro and the City to fund new and expanded transportation programs. Further, the Project would support Policy 7.4.1 by developing a streamlined development review process through amending the City's Zoning Code to create a Zoning Ordinance, which would provide a mechanism for the City to review and approve the TCN Structures. The Zoning Ordinance regulations would generally affect the location, design, operations, take-down program, and community benefits of the TCN Structures. The Zoning Ordinance and other potentially associated Zoning Code and General and/or Specific Plan amendments would create a new class of signage for the TCN Structures given their unique attributes and intelligent technology.

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 promote the City's goals, objectives, and policies of the Infrastructure and Public Services Chapter, including the City's Objective to provide for adequate public safety in emergency situations. Specifically, the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. The TCN Program would also assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. In addition, the TCN Program would be incorporated into the alert information for the freeway messaging system and major arterial network for the region, including Earthquake Early Warning System information, as well as Amber Alerts. 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, overall the Project would not conflict with the relevant goals, objectives, and policies of the General Plan Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(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 5 of Appendix I of this Draft EIR. As detailed therein, the Project would support Policy 2.5 and Policy 3.4 by improving the performance, efficiency, and reliability of existing and future bus and transit service for all residents, workers, and visitors by developing a TCN Program that would create advertising revenue to be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority and bus wi-fi and efficiently relay bus arrival time information to riders by displaying public transit information on the TCN Structures. The Project would also support Policy 3.5 regarding maximizing multi-modal

connectivity and access for transit riders and Policy 3.6 regarding promoting Union Station as a regional transportation hub. Further, the Project would be consistent with Policy 3.7 by improving transit access and service to major regional destinations, job centers, and inter-modal facilities as the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies, including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. Specifically, the TCN Program would support the collection of event congestion data for LAX, Dodger Stadium, the Hollywood Bowl and other large venues, including travel demand management services for the 2028 Olympic and Paralympic Games, and would also provide information regarding available parking spaces in park-and-ride lots. In addition, the Project would support Objective 4.5 regarding coordinating with regional transportation agencies; Policy 4.6 regarding utilizing data to prioritize transportation projects; Policy 4.7 regarding collecting data; Policy 4.8 regarding encouraging TDM strategies; Policy 5.2 regarding supporting a reduction in VMT; Policy 4.11 regarding operation of a cohesive regional mobility system; and Policy 4.14 regarding delivering information through signage and digital platforms. However, as discussed in Table 5 of Appendix I Site Locations NFF-7 and NFF-12 would be inconsistent with Policy 2.16 as these Site Locations would locate off-site outdoor advertising adjacent to two roadway segments that have been designated by the Mobility Plan Appendix B Guidelines as scenic highways. Overall, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(3) Los Angeles General Plan Conservation Element

As identified in Subsection 2.a.(1)(a)(iii), 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, no trees would be removed as part of the Project. Any trees in the vicinity of the Site Locations would be avoided and preserved in place. Therefore, the Project is not subject to the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 186873).⁹ Additionally, as further discussed in Section IV.C, Biological

⁹ *The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 186873) protects Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species and Mexican Elderberry and Toyon shrubs that are native to Southern California, and excludes trees or shrubs grown by a nursery or trees planted or grown as part of a tree planting program.*

Resources, of this Draft EIR, based on the vegetation communities and landcover types mapped within the Biological Study Area (BSA), which is defined to include the proposed footprint of each Site Location as well as a 300-foot radius buffer, *Salix gooddingii* Forest and Woodland Alliance were identified as a sensitive vegetation community within the BSA, covering 0.585 acre.¹⁰ These areas are considered sensitive and subject to potential impacts upon construction of Site Locations FF-24 and FF-25. Further, three features potentially subject to USACE, RWQCB, and/or CDFW jurisdiction were mapped within the BSA. The LA River is within the BSA at six Site Locations: FF-3, FF-6, FF-7, FF-10, FF-11, and NFF-2. Within the BSA, the LA River is a concrete-lined flood control channel. Additionally, Haskell Creek is a modified channel that appears to support potential riparian vegetation and WOUS occurs within the BSA at Site Location FF-25. Lastly, one unnamed concrete-lined channel occurs within the BSA at TCN Structure FF-24. Table III-1 of Section III, Environmental Setting, of this Draft EIR, details the Community Plan areas of each of these Site Locations. This feature appears to support potential non-wetland WOUS and unvegetated streambed. Potential short-term indirect impacts to downstream aquatic resources could occur if fill or hazardous material were to spill into the drainages. As such, the Project would implement Mitigation Measure BIO-MM-1, which includes provisions for placement of exclusion fencing to avoid sensitive vegetation if present, preconstruction surveys, worker awareness training, placement of exclusion fencing to avoid aquatic features, and monitoring of construction activities by a qualified biologist. With implementation of Mitigation Measure BIO-MM-1, potential impacts on sensitive vegetation communities would be reduced to a less-than-significant level. Therefore, based on the above, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect with regard to biological resources.

With respect to historical resources, as discussed in Section IV.D, Cultural Resources, of this Draft EIR, four of the Site Locations, including NFF-2, NFF-3, NFF-16, and NFF-21 would result in significant and unavoidable visual impacts to historical resources. Related significant and unavoidable aesthetic resources impacts would also result at these four Site Locations. Therefore, the Project would substantially conflict with the Conservation Element's applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect with regard to historic resources and would therefore result in significant impacts.

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

The Project would support applicable goals and objectives of the Health and Wellness Element, including reducing air pollution from stationary and mobile sources and

¹⁰ The BSA includes the proposed footprint of the 56 Site Locations, as well as a 300foot radius buffer.

reducing per capita GHG emissions, as discussed in Section IV.G, Greenhouse Gas Emissions of this Draft EIR. Specifically, the Project would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that promote a decrease in VMT, reduction of traffic congestion, and improvement of air quality. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element.

(5) Community Plans

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Community Plans are discussed in Table 6 of Appendix I of this Draft EIR. The Site Locations are located within the Central City, Central City North, Silver Lake–Echo Park–Elysian Valley, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass, Northeast Los Angeles, Boyle Heights, North Hollywood–Village Valley, Sun Valley–La Tuna Canyon, Arleta–Pacoima, Granada Hills–Knollwood, Sylmar, Encino–Tarzana, West Los Angeles, South Los Angeles, Southeast Los Angeles, Palms-Mar Vista-Del Rey, Westchester-Playa-Del-Rey, Van Nuys-North Sherman Oaks, West Adams-Baldwin Hills-Leimert, and Wilshire Community Plan areas and are generally designated and zoned as commercial, public facilities, and manufacturing uses. No Site Locations are zoned for residential use. As detailed within Table 6 of Appendix I of this Draft EIR, the Project would be consistent with several of the Community Plans policies related to enhancement of and compatibility with adjacent development. The TCN Structures would be strategically located on Metro-owned property in the vicinity of Metro operations, including existing transit stops, parking areas, and depots, as well as within key geographic locations to assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. The Project would further create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. As shown in Table 6 of Appendix I, the Project would be inconsistent with several goals and policies of the Central City North, Central City, and North Hollywood–Valley Village Community Plans regarding historic resources and associated visual impacts as Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 would result in significant and unavoidable impacts associated with views of historical resources. In addition, the Site Locations FF-29 and FF-30 would also be inconsistent with the Palms-Mar Vista – Del Rey Community Plan policy prohibiting off-premise commercial signs in coastal areas since the proposed TCN Program would provide for off-premises advertising to fund new and expanded transportation programs, in addition to their functions to improve the transportation system and provide communication during emergency events.

Additionally, the Project would be consistent with several of the Community Plans' goal focused on creating a well-maintained, safe, and efficient freeway and street network.

The Project would also promote multi-modal transportation and safety and a system of freeways and streets that provides a circulation system, which supports existing, approved, and planned land uses, while maintaining a desired level service at intersections. Specifically, the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies, including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies.

Overall, based on the above, due to the Project's inconsistencies with goals and policies of the Central City North, Central City, and North Hollywood–Valley Village Community Plans regarding historic resources and associated visual impacts resulting from Site Locations NFF-2, NFF-3, NFF-16 and NFF-21, and inconsistency with the Palms – Mar Vista – Del Rey Community Plan policy regarding placement of off-site commercial advertising in coastal areas resulting from Site Locations FF-29 and FF-30, the Project would substantially conflict with the applicable goals, objectives, and policies set forth in the Community Plans and would, therefore, result in significant impacts.

(c) Los Angeles Municipal Code and Specific Plans

As discussed above, the TCN Program is contingent on the adoption of a Zoning Ordinance by the City. The proposed Zoning Ordinance would amend the City's sign regulations in Chapter I of the LAMC to authorize the TCN Structures. The Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures and would not authorize new signage other than the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits, including the take-down requirements for the removal of existing off-premise static signs. The Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City. Based on the above, the anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures, as well as a take-down component which would include the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include approximately 200 static displays located within the City. Therefore, with implementation of the Zoning Ordinance for the TCN Structures, the Project would not conflict with the LAMC.

As noted above, the Central City West, West LA Transportation Improvement Mitigation Plan, Exposition Corridor Transit Neighborhood Plan, LA Coastal Transportation

Corridor, the Vermont/Western Station Neighborhood Plan, Cornfield Arroyo Seco, and Crenshaw Corridor Specific Plans have language that explicitly prohibits either pole signs, off-site commercial signage, or both. The proposed Zoning Ordinance would be established to regulate pole signs, off-site commercial and digital signage on Metro-owned property to promote roadway efficiency, improve public safety, and augment Metro's communication capacity. The proposed Ordinance would include regulations that would supersede the sign-related limitations of the applicable Specific Plans, including the allowance of pole signs, and would include specific standards for sign area, height, setbacks, digital displays, refresh rates, and other criteria. Therefore, with implementation of the Zoning Ordinance for the TCN Structures, the Project would not conflict with the Specific Plans.

(d) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would not conflict with the majority of the goals, policies, and objectives in state, regional, and local plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would not overall conflict with environmental policies of or impede implementation of the Coastal Act, SCAG's 2020-2045 RTP/SCS, Metro's Vision Plan, the Mobility Plan and most of the policies set forth in the General Plan, including the Community Plans. However, the Project would conflict with a few goals and policies related to historical and aesthetic resources associated with Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 in the Central City North, Central City, North Hollywood–Valley Village Community Plans, as well as the General Plan's Conservation Element policies related to historical resources. In addition, the Project would conflict with the Palms – Mar Vista – Del Rey Community Plan policy regarding placement of off-site advertising within coastal areas due to Site Locations FF-29 and FF-30. As such, impacts related to conflicts with applicable plans, policies, and regulations would be significant.

(2) Mitigation Measures

The Project's impact related to conflicts with applicable land use plans would be significant. Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Rather, the primary way to mitigate these impacts would be to eliminate or relocate the Site Location(s). Refer to Section V. Alternatives for a discussion of Alternative 3 that would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21 and eliminate or relocate Site Locations FF-29, and FF-30 in order to eliminate these land use plan inconsistency impacts.

(3) Level of Significance After Mitigation

As discussed in detail above, specific Site Locations would result in conflicts with policies in the General Plan's Conservation Element and several Community Plans that were determined to be significant and unavoidable. Refer to Section V. Alternatives for a discussion of Alternative 3 that eliminates Site Locations NFF-2, NFF-3, NFF-16, NFF-21 and eliminate or relocate Site Locations FF-29, and FF-30 in order to eliminate these significant impact associated with land use plan consistency.

f. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, cumulative growth is anticipated in the surrounding area of the Site Locations through 2025, the Project's anticipated buildout year. The related projects are comprised of transportation improvements that are included in the 2020-2045 RTP/SCS, Metro's 2020 Long Range Transportation Plan, the NextGen Bus Plan, and Sidewalk and Transit Amenity Program, which are encouraged by the land use policies evaluated above. Furthermore, the related projects and the Project would improve and expand traffic and transportation systems and maximize efficiency of a congested road network consistent with local and regional goals and objectives. As with the Project, the related projects would undergo consistency review with relevant land use policies and regulations by State and Local regulatory agencies and would be subject to CEQA review. Nonetheless, as discussed above, Site Locations NFF-2, NFF-3, NFF-16, NFF-21, FF-29 and FF-30 would result in significant impacts associated with consistency with land use policies. **As such, to the extent that other related projects in the vicinity of these Site Locations also result in significant land use consistency impacts, the Project's contribution to land use impacts would be cumulatively considerable. Thus, cumulative impacts related to land use consistency would be significant.**

(2) Mitigation Measures

As discussed above, review of potential measures to reduce the Project's significant land use plan consistency impacts, such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Rather, the primary way to substantially reduce these impacts would be to eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21 and eliminate or relocate Site Locations FF-29, and FF-30. Refer to Section V. Alternatives for a discussion of Alternative 3 that would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21 and eliminate or relocate Site Locations FF-29, and FF-30 in order to eliminate these land use plan inconsistency impacts.

(3) Level of Significance After Mitigation

With regard to impacts associated with conflicts with applicable land use plans, cumulative impacts were determined to be potentially significant and unavoidable and no mitigation measures have been identified. As such, the level of significance remains significant and unavoidable.