IV. Environmental Impact Analysis
F. 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 conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Specifically, Section IV.A, Air Quality, of this Draft EIR, evaluates the Project's consistency with the South Coast Air Quality Management District's Air Quality Management Plan and the City of Los Angeles (City) General Plan Air Quality Element; Section IV.E, Greenhouse Gas Emissions, evaluates the Project's consistency with the 2022 Climate Change Scoping Plan, the Los Angeles Green Building Code, and the Green New Deal; Section IV.I, Transportation, (and the Transportation Assessment included as Appendix I of this Draft EIR) evaluates the Project's consistency with the City's Mobility Element 2035 and Vision Zero Action Plan, as well as many of the plans discussed herein as they relate to transportation; and Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, evaluates the Project's consistency with the Los Angeles Department of Water and Power (LADWP's) Urban Water Management Plan (UWMP). Project consistency with the Southern California Association of Governments (SCAG) RTP/SCS is evaluated in this section and also in Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, 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 65300 *et seq*.
- Senate Bill 375
- Senate Bill 743

- California Coastal Act of 1976
- Southern California Association of Governments Regional Transportation Plan/ Sustainable Communities Strategy
- City of Los Angeles General Plan
- Central City North Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- River Implementation Overlay District
- Downtown Design Guide

(1) State

(a) California Government Code Section 65300 et seq.

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

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals to reduce greenhouse gas (GHG) emissions 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 to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage

residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(c) Senate Bill 743

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

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.

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

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

The Project Site is located on an infill site, as defined in PRC 21099(a), because the Project Site consists of a lot located within an urban area that has been previously developed. The Project Site is also located within a transit priority area (TPA), as defined in PRC Section 21099(a)(7), because it is located within 0.5 mile of an existing "major transit stop." The Project Site is well served by a variety of public transit options, including a number of local and regional bus lines serviced by Metro and LADOT that provide connections to Downtown rail stations. In particular, Metro Lines 16 and 18 run along 6th Street, adjacent to the Project Site, and the Project Site is located within 0.5 miles of Metro Lines 53 and 60 at the intersection of 7th Street and Central Avenue, Metro Lines 53 and 720 at the intersection of East 6th Street and Central Avenue, and the LADOT DASH A at the intersection of Palmetto Street and Colyton Street. These lines run at frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project Site is located in a TPA as defined in PRC Section 21099. The City's Zone Information and Map

Access System (ZIMAS) also confirms the Project Site's location within a TPA as defined in the ZI No. 2452.[1]

(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). 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 2020–2045 RTP/SCS' "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)[2] by 6 percent and the share of new job growth in HQTAs by 15 percent. See Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, of this Draft EIR for further discussion of the 2020–2045 RTP/SCS.

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[1] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5164-010-003, -004 and -995.*

[2] *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.*

It is noted that SCAG recently released an updated RTP/SCS, Connect SoCal 2024 (also referred to as the 2024–2050 RTP/SCS), which was approved by SCAG's Regional Council in April 2024. Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region's shared goals through 2050. While Connect SoCal 2024 remains focused on its core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a Sustainable Communities Strategy, it also encompasses a holistic approach to programs and strategies that support the success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The top-line goals are: Mobility (build and maintain an integrated multimodal transportation network; Communities (develop, connect and sustain communities that are livable and thriving; Environment (create a healthy region for the people of today and tomorrow; and Economy (support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents). The 2022 AQMP discussed in Section IV.A, Air Quality, of this Draft EIR, incorporates SCAG's 2020–2045 RTP/SCS. As such, SCAG's 2020–2045 RTP/SCS is considered herein.

(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.

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[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 April 22, 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).*

(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's Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to, reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

(2) 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.

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

(3) Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological 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.

(4) Economic Development Chapter

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

(ii) Mobility Plan 2035

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

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

- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

Included in this General Plan element are 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 that call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(v) Central City North Community Plan

The Central City North Community Plan is one of 35 community and district plans established for different areas of the City to implement the policies of the General Plan Framework Element. Last updated in 2000,[7] the Community Plan was developed in the context of promoting a vision for the Central City North Community Plan area as a community that: preserves and enhances the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing; improves the function, design, and economic vitality of the commercial corridors; preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximizes the development opportunities of future transit systems while minimizing any adverse impacts; and plans the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Central City North Community Plan area.

(b) Los Angeles Municipal Code

All development activity on the Project Site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation.

[7] *The City of Los Angeles Department of City Planning updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. On May 3, 2023, the Los Angeles City Council voted unanimously to approve the DTLA 2040 Plan. Following City Council approval, the implementing ordinances will be reviewed and finalized by the City Attorney to ensure clarity of regulations and consistency with state law. DTLA 2040 will be brought into effect by the City Council upon adopting the implementing ordinances after completion of form and legality review.*

(c) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines, such as those found in Community Design Overlays.

(d) Downtown Design Guide: Urban Design Standards and Guidelines

On April 24, 2009, the Los Angeles City Council approved a General Plan Amendment to the Central City Community Plan to revise Chapter V of the Central City Community Plan text to incorporate the Downtown Design Guide (DDG). The DDG was created to implement common design objectives that maintain neighborhood form and character while promoting design excellence, creative infill development solutions, and sustainable development practices and innovations. As such, the DDG encourages the development of an increasingly livable and sustainable Downtown community. The DDG focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The successful treatment of these key features, coupled with particular attention to the details of a project within the first 30 to 40 vertical feet, forms the basis for providing high quality development at a human scale.[8] The updated DDG was adopted by the City Planning Commission in June 2017 as an official guide for development within the Downtown area. The Project Site is located outside of the boundaries of the Downtown Design Guide. As such, these design standards and guidelines are not applicable to the Project Site and are not discussed herein.

(e) River Improvement Overlay District

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own

[8] *City of Los Angeles, Downtown Design Guide, June 2017.*

specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

In connection with the Los Angeles River Revitalization Master Plan, which focuses on the creation of parks, paths and open spaces in the vicinity of the Los Angeles River, the RIO District proposes the establishment of a distinct sustainable environment in the surrounding neighborhoods to promote concepts developed in the Los Angeles River's Master Plan. The River Improvement Overlay (RIO) District establishes landscaping, design criteria, and administrative review procedures for projects within the RIO District. Pursuant to Ordinance No. 183,145, the purposes of RIO Districts include: supporting the goals of the Los Angeles River Revitalization Master Plan; contributing to the environmental and ecological health of the City's watersheds; establishing a positive interface between river adjacent property and river parks and/or greenways; promoting pedestrian, bicycle and other multi-modal connections between the river and its surrounding neighborhoods; providing native habitat and support local species; providing an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; providing safe, convenient access to and circulation along the river; promoting the river identity of river adjacent communities; and supporting the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program. The Project's consistency with the RIO District is described below.

b. Existing Conditions

(1) Project Site

The Project Site is currently developed with two single-story warehouse structures, consisting of approximately 311,000 square feet of floor area. The existing buildings are currently used for storage and distribution purposes. The Project Site also includes surface parking areas for automobiles and tractor trailer trucks.

The Project Site is relatively flat with limited ornamental landscaping. A total of six trees were identified surrounding the Project Site, all of which are located along Alameda Street in the public right-of-way. No on-site trees were observed. The street trees identified consist of various non-native species, including four yew pine trees, one pink trumpet tree,

and one desert willow tree. None of the street trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[9,10]

The Project Site is located within the Central City North Community Plan area. As shown in Figure IV.F-1 on page IV.F-14, the Project Site is designated as Heavy Manufacturing and is zoned as M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). As shown in Figure IV.F-2 on page IV.F-15, the M3 zone corresponds to the Project Site's Heavy Industrial land use designation. The Project Site's zoning is, therefore, consistent with the Project Site's Community Plan land use designation. The M3 zone allows for motion picture, television, video, and other media production (and supporting office) uses by right. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District 1. All uses located in the M3 zone and within Height District 1 are restricted to a maximum floor area ratio (FAR) of 1.5 times the property's buildable area.[11] Height District 1 does not impose a vertical height limitation on the Project Site. The M3 zone does not impose any setback requirements for commercial or industrial uses. Accordingly, buildable area for FAR purposes is the same as lot area. With a maximum FAR of 1.5 to 1, the Project Site's 635,551 square feet of lot area/buildable area would permit up to 953,326 square feet of floor area. The RIO in the property's zoning designation refers to the Project Site's location in the Los Angeles River Improvement Overlay Zone. The RIO does not impose any use, FAR, height, or setback restrictions or standards. Pursuant to LAMC Section 13.17, projects in the Los Angeles River's outer core, including the Project, are required to comply with various screening standards and requires that new landscaping utilize native species.

As identified in ZIMAS, the Project Site is also located within a Transit Priority Area (TPA), Metro ROW Project Area, the Los Angeles State Enterprise Zone, and the River Improvement Overlay District (RIO). Consultation with Metro is required prior to the issuance of any building permit for projects within 100 feet of Metro-owned rail or bus rapid transit (BRT) right-of-way (ROW).[12] The Project would undergo the required Metro review and clearance process.

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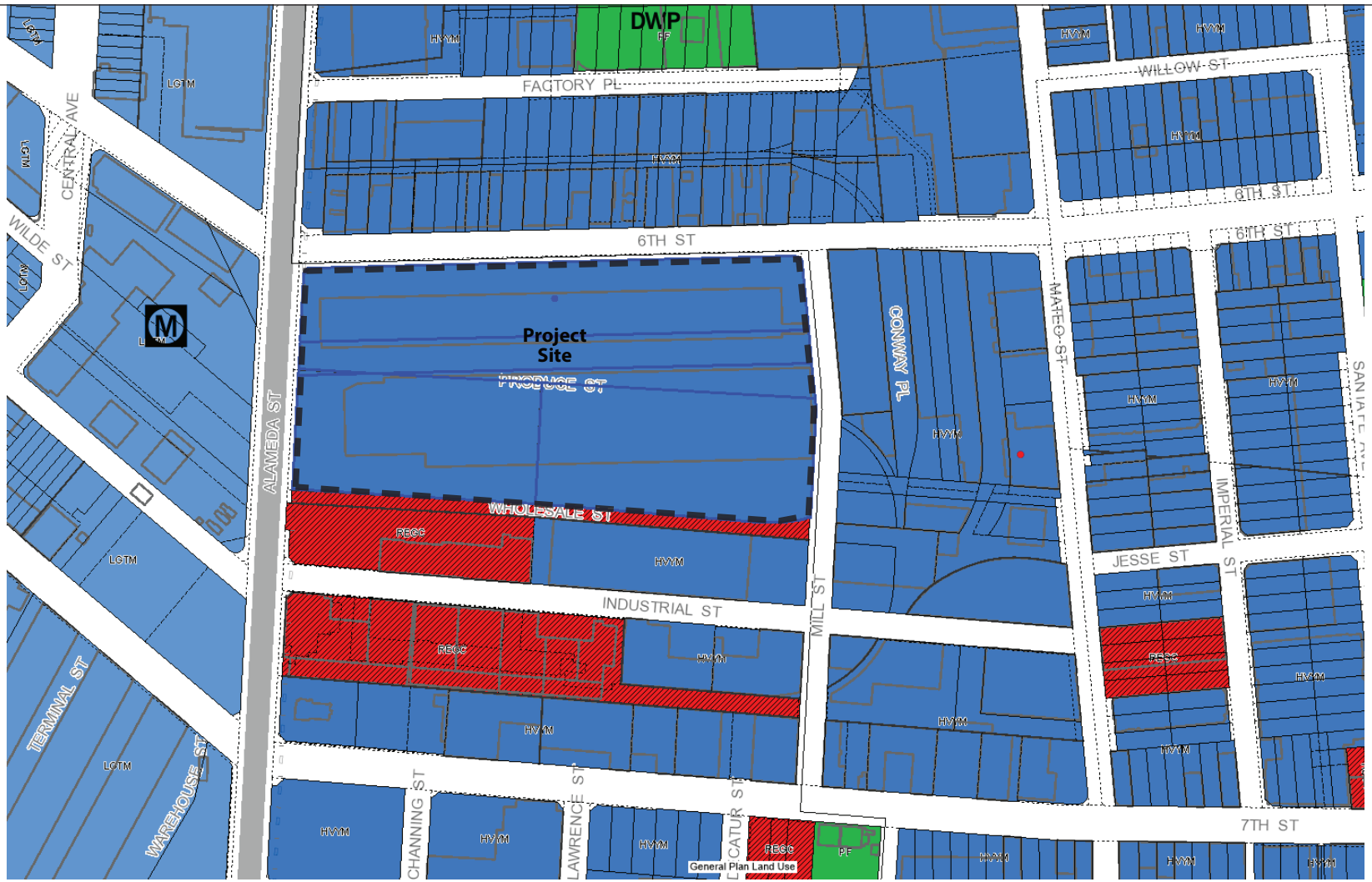
[9] *Carlberg Associates, 6th and Alameda, Los Angeles, California 9021 – City of Los Angeles Tree Inventory Report, August 4, 2022. See Appendix IS-1 of the Initial Study, which is included as Appendix A of this Draft EIR.*

[10] *Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.*

[11] *FAR and height restrictions can be found in LAMC Section 12.21.1 A.1.*

[12] *City of Los Angeles Zoning Information and Map Access System, Inter-Departmental Correspondence, September 1, 2021.*



LEGEND

INDUSTRIAL
- Heavy Manufacturing
- Light Manufacturing

COMMERCIAL
- Regional Center Commercial

OPEN SPACE / PUBLIC FACILITIES
- Public Facilities

Figure IV.F-1
Land Use Designations for the Project Site and Vicinity

Source: ZIMAS, 2024; Eyestone Environmental, 2024.

LEGEND

GENERALIZED ZONING

CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI

Figure IV.F-2
Existing and Proposed Zoning

Source: ZIMAS, 2024; Eyestone Environmental, 2024.

(2) Surrounding Uses

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings, containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned M3, which is consistent with the Project Site's zoning. To the north of the Project Site, across 6th Street, is property zoned as M3-1-RIO, including a mixture of one-, two-, and three-story buildings with a variety of uses. To the east of the Project Site, across Mill Street, is additional property zoned as M3-1-RIO, including a 6-story building with mostly industrial use. To the west of the Project Site, across Alameda Street, is land zoned as PF (public facilities) and is comprised of a Metro bus storage and maintenance facility. Additionally, there are various 7-story structures and a 10-story parking garage located across 7th Street from the Metro bus storage and maintenance facility, which are part of the ROW DTLA commercial development. To the south of the Project Site is land zoned as C2-2D-RIO and M3-1-RIO, including a mixed-use project currently under construction to the immediate south of Industrial Street, comprised of live/work units and commercial, retail, restaurant and art production space; however, a majority of the other southern parcels are either vacant or include one- and two-story buildings.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community;

Threshold (b): Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

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

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate impacts related to land use consistency:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and

- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

b. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. Specifically, as provided in Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34:

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

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. As discussed in the Office of Planning and Research (OPR), State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. More specifically, a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Further, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan, but need not be in perfect conformity with every plan policy.[13] The analysis below provides a discussion of Project's consistency with applicable

[13] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

goals, objectives, and policies adopted for the purpose of avoiding or mitigating an environmental effect in the 2020–2045 RTP/SCS, General Plan Framework Element, Mobility Plan 2035, Conservation Element, Health and Wellness Element, Central City North Community Plan, LAMC, Los Angeles River Design Guidelines, and the Citywide Design Guidelines.

c. Project Design Features

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

d. Analysis of Project Impacts

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

As evaluated in the Initial Study, which is included as Appendix A of this Draft EIR, and summarized in Section VI, Other CEQA Considerations, of this Draft EIR, the Project Site is located within the highly urbanized Central City North Community Plan area and is currently occupied by two large warehouse structures and surface parking and loading areas. The Project proposes the demolition of the existing warehouse structures for the construction of a new production studio campus.

The Project Site would maintain its established zoning designation of M3-1-RIO and the proposed uses on the Project Site would be consistent with the mix of uses located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the permanent closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. **Therefore, as determined in the Initial Study, the Project would not physically divide an established community, and impacts with respect to Threshold (a) would be less than significant. No further analysis is required.**

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

(1) Impact Analysis

(a) Consistency with Regional Plans

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in Table 4 of Appendix I of this Draft EIR. As detailed therein, the

Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the 2020-2040 RTP/SCS goals to improve mobility and accessibility; support healthy and equitable communities, increase travel choices within the transportation system; reduce greenhouse gas emissions; and improve air quality. The Project would be developed within an existing urbanized area that provides an established network of roads and freeways facilitating local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including several bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG High-Quality Transit Area and City of Los Angeles Transit Priority Area, as indicated in the City's Zoning Information File No. 2452. Furthermore, the Project would provide a total of 173 bicycle parking stalls. While public access to the Project Site would not be available due to the security needs of a production studio campus, the proposed office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies with a potential commercial space at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. In addition, the Project would incorporate open space, landscaping, and streetscape improvements which would serve to enhance the public realm and improve the pedestrian experience. The Project would also support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the 2020–2045 RTP/SCS.

(b) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with applicable goals, objectives, and policies of the General Plan, including the Framework Element, Mobility Plan 2035, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), Central City Community Plan; LAMC (Zoning Code); River Improvement Overlay Zone; and Citywide Design Guidelines; that were specifically adopted for the purpose of avoiding or mitigating an environmental effect.

(i) City of Los Angeles General Plan Framework Element

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in Table 1 in Appendix I of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect.

(1) Land Use Chapter

The Framework Element's Land Use Diagrams designate districts, centers and mixed-use boulevards. As discussed above, the Project Site is located just outside the Downtown Center, which is defined as an international center for finance and trade that features dense, high-rise development.[14] The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by developing a new production studio campus that would meet the needs of local residents and sustain economic growth by introducing new employment opportunities in the area.

Specifically, the Project would support the City's Goal 3A and associated Objective 3.1 to have 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, and achievement of the vision for a more livable city by replacing existing underutilized storage and distribution facilities with a new production studio campus that would maximize the Project Site's productivity. The proposed uses would help to provide a diverse development that would provide job opportunities and support the needs of existing and future businesses. The Project would incorporate sustainability features required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. In addition, the Project would incorporate open space and landscaping features, which have been designed to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide useable open space on-site for employees and visitors.

The Project would further support Objective 3.2 to 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 as well as Policy 3.2.3 to provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations. As detailed in Table 1 in Appendix I of this Draft EIR, the Project Site is located in a Transit Priority Area (TPA) and is well served by a variety of public transit options, including a number of local and regional bus lines serviced by Metro and LADOT that provide connections to Downtown rail stations. The Project would also provide 173 bicycle parking spaces inclusive of 68 short-term and 105 long-term bicycle parking spaces. While pedestrian access to the campus would not be available to the public, the proposed office buildings would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. In addition, the Project would incorporate lighting and wayfinding signage to enhance pedestrian safety in the public right of way. Therefore, the Project would provide

[14] *Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Figure 3-1: Long Range Land Use Diagram—Metro, re-adopted by City Council on August 9, 2001.*

opportunities for the use of alternative modes of transportation, including access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution.

Overall, as provided in Table 1 in Appendix I of this Draft EIR, the Project would not conflict with the General Plan Framework Element Land Use Chapter.

(2) Urban Form and Neighborhood Design Chapter

The Project would not conflict with the applicable objectives and policies 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. Specifically, the Project would promote the City's Objective 5.2 to encourage future development in centers and in nodes along corridors that are served by transit through the development of a new production studio campus within the Downtown Center and along a primary corridor that is served by various public transit options. Additionally, consistent with Objective 5.5 to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm, the Project would replace the existing underutilized storage and distribution uses with a new production studio campus that would upgrade the quality of development within and in the vicinity of the Project Site through the incorporation of attractive architectural features and landscaping and open space features designed to enhance the public realm and create more effective transitions between on- and off-site uses. Also, consistent with Objective 5.9, the Project would include fencing, walls, landscaping, and other elements to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy for certain production activities and ensure pedestrian safety. In addition, the Project would also incorporate lighting and wayfinding signage to enhance pedestrian safety in the public right of way. As such, the Project would not conflict with the General Plan Framework Element Urban Form and Neighborhood Design Chapter.

(3) Open Space and Conservation Chapter

The Project would support Objective 6.1 of the Open Space and Conservation Chapter to 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. Specifically, the Project would not encroach into the City's natural settings, as the Project is located on an infill site that has already been previously developed and contains limited landscaping. In addition, the six street trees identified along Alameda Street consist of various non-native species, which are not protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. The Project would incorporate a cohesive plant palette to be used along the streetscape, and within the roof decks of the proposed office buildings. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub, and groundcover

species, including shade trees. As part of the Project, the six existing trees along Alameda Street to be removed would be replaced at a 2:1 ratio in accordance with City requirements. In addition, the Project would include the planting of additional trees along the perimeter of the Project Site to enhance the streetscape. Therefore, the Project would not conflict with the General Plan Framework Element Open Space and Conservation Chapter.

(4) Economic Development Chapter

The Project would be consistent with Objective 7.2 and associated Policy 7.2.3 of the General Plan Framework Element Economic Development Chapter to establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality and to encourage new commercial development in proximity to rail and bus transit corridors and stations. As previously discussed, the Project would replace the existing uses on the Project Site with a new production studio campus that would meet the needs of local residents and sustain economic growth by introducing new employment opportunities in the area. The Project would also include sustainability features required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. In addition, the Project Site's location in proximity to public transit and inclusion of bicycle parking would encourage alternative modes of transportation, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Therefore, the Project would not conflict with the General Plan Framework Element Economic Development Chapter.

(5) Infrastructure and Public Services Chapter

The Project would support Policy 9.3.1 and Objective 9.6 within the General Plan Framework's Infrastructure and Public Services Chapter which are intended to reduce the total amount of flow entering the stormwater system, as well as to pursue effective and efficient approaches to protecting water quality. Specifically, as discussed in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants into stormwater runoff. In addition, as discussed in the Initial Study for the Project, the Project would comply with the City's Low Impact Development (LID) Ordinance, which promotes on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs. Overall, the Project would not conflict with the applicable goals, objectives, and policies of the General Plan Framework's Infrastructure and Public Services Chapter which have been adopted for the purpose of avoiding or mitigating an environmental effect.

(6) Conclusion

Based on the analysis above, 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.

(ii) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 2 of Appendix I of this Draft EIR. As detailed therein, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, as outlined in Section IV.I, Transportation, of this Draft EIR, that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would also support the City's policy to ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

The Project would further promote Policy 3.1 to recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes, as integral components of the City's transportation system by providing adequate vehicular and pedestrian access and providing bicycle parking. As discussed in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided from two large, gated driveways along 6th Street, and two additional driveways on Mill Street. In addition, the Project would provide 173 bicycle parking spaces inclusive of 68 short-term and 105 long-term bicycle parking spaces. The Project is located in a TPA and is well served by a variety of public transit options, including a number of local and regional bus lines serviced by Metro and LADOT that provide connections to Downtown rail stations. Due to the unique security requirements of production studio campuses, public access to the campus would not be available. However, each of the office buildings fronting 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. In addition, the Project incorporates streetscape improvements along Alameda Street, 6th Street, and Mill Street which would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. Therefore, as detailed in Table 2 in Appendix I of this Draft EIR, 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.

(iii) Conservation Element

As outlined above, Section 5 of the Conservation Element of the General Plan 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 to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. As discussed in Section IV.B, Cultural Resources, of this Draft EIR, since the existing buildings on the Project Site are not eligible for listing in the National or California Registers or for local designation, there is no potential direct impacts to historical resources on the Project Site. The Project Site is surrounded on three sides by an area identified in SurveyLA as a potential historic district, which is the Downtown Los Angeles Industrial Historic District. Construction activities associated with the Project do have the potential to directly impact historical resources of a property located at 1567 Industrial Street, which is the only contributing property to the historic district that is immediately adjacent to the Project Site. However, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, precautions would be taken during planning, excavation, and construction such that the proposed new construction would not result in material alteration of the adjacent historical structures. In compliance with Standard 9 set forth by the Secretary of Interiors Standards for Treatment of Historic Properties, the Project would maintain a similar size, scale, proportion and massing to the adjacent historic district and would not impact the historic district's integrity of setting. As such, the Project would protect an important historical resource, consistent with the goals, objectives, and policies of the Conservation Element.

(iv) Health and Wellness Element

The Project would be consistent with the applicable objectives and policies in the Health and Wellness Element by promoting healthy living, and integrating healthy building design on a Project Site located in close proximity to public transit. The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code, the CALGreen Code, and the California Building Energy Efficiency Standards. In compliance with these requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to: Energy Star appliances; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; use of daylighting where feasible; and energy-efficient lighting. In addition, the Project would include new landscaping along Alameda Street, 6th Street, and Mill Street. These landscaped perimeter areas would include street trees and shrubs, lighting, and wayfinding signage. Along Alameda Street and Mill Street, proposed landscaped areas would add to the available public open space, which would enhance the pedestrian experience and promote walkability. Furthermore, the Project

would provide 173 bicycle parking stalls, which would promote biking and contribute to the creation of a healthy community. Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

(v) Central City North Community Plan

The Project's consistency with the applicable goals, objectives, and policies set forth in the Central City North Community Plan is discussed in detail in Table 3 of Appendix I of this Draft EIR. As discussed therein, the Project would be consistent with the objectives and policies that support the goals of the Central City North Community Plan. Specifically, the Project would support Objective 2-1 to provide additional opportunities for new commercial development and services by replacing the existing storage and distribution uses with a new production studio campus. The Project design and improvements would enhance the existing pedestrian activity and promote walkability by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, and wayfinding signage. In addition, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining the unique security needs of a production studio campus. The Project would also support Goal 12 of the Community Plan which encourages alternative modes of transportation as the Project would be in close proximity to various public transit options and to nearby commercial and offices uses. The Project would also provide onsite bicycle parking spaces to promote alternative modes of transportation that would reduce vehicle trips. Based on the analysis above, and as detailed in Appendix I of this Draft EIR, the Project would not conflict with the goals, objectives, and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(vi) Los Angeles Municipal Code

As previously discussed, the Project Site is located within the Central City North Community Plan area. The Project Site is designated as Heavy Manufacturing and is zoned as M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). The M3 zone corresponds to the Project Site's Heavy Industrial land use designation. The Project Site's zoning is, therefore, consistent with the Project Site's Community Plan land use designation. The M3 zone allows for motion picture, television, video, and other media production (and supporting office) uses by right. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District 1. All uses located in the M3 zone and within Height District 1 are restricted to a maximum floor area ratio (FAR) of 1.5 times the property's buildable area.[15] Height District 1 does not impose a vertical height

[15] *FAR and height restrictions can be found in LAMC Section 12.21.1 A.1.*

limitation on the Project Site. The M3 zone does not impose any setback requirements for commercial or industrial uses. Accordingly, buildable area for FAR purposes is the same as lot area. With a maximum FAR of 1.5 to 1, the Project Site's 635,551 square feet of lot area/buildable area would permit up to 953,326 square feet of floor area. The Project would have a FAR of 1.06:1 and would comply with the FAR requirements of the LAMC for the Project Site.

The RIO in the property's zoning designation refers to the Project Site's location in the Los Angeles River Improvement Overlay Zone. The RIO does not impose any use, FAR, height, or setback restrictions or standards. Pursuant to LAMC Section 13.17, projects in the Los Angeles River's outer core, including the Project, are required to comply with various screening standards and requires that new landscaping utilize native species. The Project will comply with all landscaping, screening and fencing requirements in Section 13.17.

(vii) River Implementation Overlay District

As discussed above, the Project Site is located within the boundaries of the RIO District and would comply with all landscaping, screening and fencing requirements in Section 13.17. The Project would also be required to comply with the Los Angeles River Design Guidelines, which establish best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and river-adjacent development.[16] Although the Project Site is located within the boundaries of the RIO District, the Project Site is located approximately 1 mile west of the Los Angeles River and is separated from the Los Angeles River by existing roads, buildings and rail tracks. Nevertheless, the Project would support the relevant Objective 2 of the Los Angeles River Guidelines, which calls for employing high quality, attractive and distinguishable architecture and designing the Project in substantial compliance with the Citywide Design Guidelines. Therefore, the Project would not conflict with the RIO District or with the Los Angeles River Design Guidelines.

(viii) Citywide Design Guidelines

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

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[16] *City of Los Angeles Department of City Planning, Los Angeles River Design Guidelines, July 29, 2015; Urban Design Studio, www.urbandesignla.com/resources/RiverDesignGuidelines.php, accessed February 13, 2023.*

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

The Project would be constructed within the boundaries of the Project Site and would not include the installation of barriers that would affect existing pedestrian mobility in the vicinity of the Project Site. In addition, the Project would comply with all applicable LAMC requirements regarding the provision of adequate sidewalks for pedestrian access. As discussed in Section II, Project Description, of this Draft EIR, the Project would also improve the pedestrian experience by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage. Landscaped roof decks within each of the two office buildings would also be provided. Additionally, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities and ensure pedestrian safety. Thus, the Project would support this guideline.

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

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided from two large, gated driveways along 6th Street (referred to as the West Gate and the East Gate), and two additional driveways on Mill Street. The West Gate would provide separate lanes for truck and passenger vehicle access. The East Gate would provide truck and passenger vehicle access. The northern gate on Mill Street would be for passenger vehicles accessing the parking structure and VIP access to the office building proposed on the east side of the Project Site. The southern gate on Mill Street would be for delivery access to the basecamp area of Studios 7 and 8. An Emergency Vehicle only access driveway would also be located at Alameda Street along the southern boundary of the Project Site, exiting at Mill Street. Pedestrian-safety features would be incorporated at entrances/exits to minimize pedestrian-vehicular conflicts. Moreover, the Project design aims to reduce the number of curb cuts along 6th Street to minimize vehicle access to the Project Site, which would enhance the safety of Project Site users and improve the pedestrian realm along this street frontage. Thus, the Project would support this guideline.

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

As previously described above, the Project would improve the pedestrian experience by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, and

wayfinding signage. Additionally, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity and maintain human scale along those street frontages. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities and ensure pedestrian safety. Overall, the Project would support this guideline.

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

The Project Site is located within the Central City North Community Plan area. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings, containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned M3, which is consistent with the zoning of the Project Site. To the north of the Project Site, across 6th Street, is property zoned as M3-1-RIO, including a mixture of one-, two-, and three-story buildings with a variety of uses. To the east of the Project Site, across Mill Street, is additional property zoned as M3-1-RIO, including a 6-story building with mostly industrial use. To the west of the Project Site, across Almeda Street, is land zoned as PF (public facilities) and is comprised of a Metro bus storage and maintenance facility. Additionally, there are various 7-story structures and a 10-story parking garage located across 7th Street from the Metro bus storage and maintenance facility, which are part of the ROW DTLA development. To the south of the Project Site is land zoned as C2-2D-RIO and M3-1-RIO. To the immediate south of Industrial Street, a mixed-use project, comprised of live/work units and commercial, retail, restaurant and art production space, is currently under construction; however, a majority of the other southern parcels are either vacant or include one- and two-story buildings. As described in Section II, Project Description, of this Draft EIR, the proposed studio buildings would each be one story and have a maximum height of 57 feet to the top of the parapet (mechanical equipment could extend up to an additional 20 feet). The proposed covered production support areas would be one story and would not exceed a height of 20 feet. The proposed office structures would be five stories and up to 74 feet in height to the last occupiable floor (mechanical equipment could extend up to an additional 20 feet). As such, the Project's scale and density would be consistent with development patterns and projected growth in the surrounding area. Thus, the Project would support this guideline.

Guideline 5: Express a clear and coherent architectural idea

As discussed in Section II, Project Description, of this Draft EIR, the proposed design of the Project provides massing and a variety of materials and texture on the public-facing street façades. Wrapping the principal urban corners of each side of the Project Site at 6th Street and Alameda Street and at 6th Street and Mill Street, high-quality, transparent and engaging storefront glazing would clad the lobby of each creative office building at the street

level. The studio buildings along 6th Street would utilize textured concrete and paint to create visual interest, and space would be provided for landscaping in front of each. Along Mill Street and Alameda Street, landscaped areas would provide additional green open space along the public right-of-way on all public sides of the Project. On 6th Street, planters would be sized appropriately to accommodate trees and screening plants directly adjacent to studio building walls. Additional design features, such as murals and landscaping, could be used to further enliven the appearance of these public facing façades. Along 6th Street at the mid-block, between two clusters of studio buildings, a low-rise covered support area would break up the studio building massing and improve the pedestrian scale of the sidewalk. Internally and externally, the Project would utilize high-quality materials for the design of the structures and landscaped common areas to create valuable office and production space, with all production-related noise contained within the Project's internal courtyards and "base camp" areas. The overall architectural idea is to provide a design that reflects a high-quality studio campus that activates the streetscape and encourages pedestrian use while maintaining the unique security needs of a studio campus. Based on the above, the Project would support this guideline.

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

The Project has been designed to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide Project employees with usable on-site open space. The Project would incorporate streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. As previously described above, the Project would improve the pedestrian experience by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, and wayfinding signage. Landscaped roof decks within each of the two office buildings would also be provided. Additionally, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity and maintain human scale along those street frontages. Thus, the Project would support this guideline.

Guideline 7: Carefully arrange design elements and uses to protect site users

As previously discussed, the Project would incorporate fencing, walls, landscaping, and other elements to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities as well as ensure pedestrian safety. The 16 studios would be organized around the Project Site within five studio buildings such that six studios within two studio buildings align with 6th Street and 10 studios within three studio buildings align with Wholesale Street. The two office buildings would anchor the two principal urban corners of the Project Site, at 6th Street and Alameda

Street and at 6th Street and Mill Street. Light sources would be shielded and/or directed inward to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties. Thus, the Project would support this guideline.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. Existing landscaping within the Project Site is limited and the site is entirely impervious. According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of the Initial Study included as Appendix A of this Draft EIR, surrounding the Project Site are six trees within the public right-of-way. The inventoried trees include four *Padocarpus Macrophyllus* (Yew Pine) trees, one *Handroanthus Impetiginosus* (Pink Trumpet) tree, and one *Chilopsis Linearis* (Desert Willow) tree. None of these street trees are protected by the City of Los Angeles Protected Tree and Shrub ordinance No. 186,873. As part of the Project, the six existing trees along Alameda Street would be removed and replaced at a 2:1 ratio in accordance with City requirements. In addition, the Project would include the planting of additional street trees along the perimeter of the Project Site. Thus, the Project would support this guideline.

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

As discussed in Section II, Project Description, of this Draft EIR, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). In compliance with code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to, Energy Star appliances; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; use of daylighting, where feasible; and energy-efficient lighting. Thus, the Project would support this guideline.

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

As discussed in the Initial Study, included as Appendix A of this Draft EIR (see Checklist Section X, Hydrology and Water Quality), per the Low Impact Development (LID) requirements, as determined by the City of Los Angeles Department of Public Works, Bureau of Sanitation, the Project would include BMPs to treat a "first flush" volume of runoff equal to the greater of an 85th Percentile 24-hour or 0.75-inch rainfall event.

Thus, the Project would support this Guideline.

(c) Conclusion

Based on the analysis provided above, the Project would not conflict with the applicable goals, objectives, and policies in local and regional plans that were adopted to avoid or mitigate an environmental effect. As such, impacts related to conflicts with land use plans would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As discussed in Section III, Environmental Setting, of this Draft EIR, a total of 21 related projects have been identified in the vicinity of the Project Site. The related projects comprise a variety of uses, including apartments, retail, restaurant, and office uses, and mixed-use developments incorporating some of all of these elements. The related projects generally consist of infill development and redevelopment of existing uses, which are encouraged by the land use policies in the land use plans applicable to the vicinity of the Project Site and related projects. Furthermore, the related projects and the Project would increase employment opportunities in the vicinity, concentrate development near public transit, provide needed housing and amenities, and activate the surrounding area, consistent with local and regional goals and objectives. As with the Project, the related projects would

be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Since the Project on the whole would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. **Therefore, the Project and related projects would not result in significant cumulative impacts related to land use consistency. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to land use consistency would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to land use and planning would be less than significant. Thus, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

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