

IV. Environmental Impact Analysis

G. Land Use

1. Introduction

This section analyzes the project's potential impacts with regard to land use. Specifically, this section analyzes the project's consistency with relevant land use plans, policies, and regulations and evaluates the relationship of the project with surrounding land uses. The analysis is based on information contained in the proposed Draft Boyle Heights Community Project Specific Plan (Specific Plan) provided in Appendix B of this Draft EIR. This section also provides an analysis of the potential for the operation of the project's retail component to directly or indirectly cause "urban decay." The Urban Decay Analysis is based on the "*Urban Decay*" *Analysis of the Proposed Boyle Heights Mixed-Use Community Project, City of Los Angeles, California* (Urban Decay Analysis), prepared in July 2010 by HR&A Advisors, Inc., which is provided in Appendix H of this Draft EIR.

2. Environmental Setting

a. Existing Conditions

(1) Project Site

The project site is located in the southwestern portion of the Boyle Heights Community of the City of Los Angeles. The site location, illustrated in Figure II-1 in Section II, Project Description, of this Draft EIR, is approximately 14.5 miles east of the Pacific Ocean, 2 miles southeast of downtown Los Angeles, and approximately 0.4 mile east of the Los Angeles River. The site consists of approximately 68.8 acres (excluding adjacent perimeter roadways) and is generally bordered by East 8th Street (referred to herein as 8th Street) to the north, Grande Vista Avenue to the east, and Olympic Boulevard to the south, with the western boundary located parallel to and just east of South Soto Street (referred to herein as Soto Street). Nearby jurisdictions include the unincorporated East Los Angeles area of the County of Los Angeles to the east, the City of Vernon to the south, and the City of Commerce to the southeast.

The project site was originally developed as the Wyvernwood Garden Apartments (Wyvernwood) in 1938 as a planned community in the spirit of the Garden City movement that was prevalent in the early part of the twentieth century. Wyvernwood became the first

multi-family residential project in Southern California to implement Garden City planning concepts on a large scale and was the largest multi-family housing project constructed in the City of Los Angeles prior to World War II. The project site has evolved somewhat over the years, with the addition of eight residential buildings in the 1960s and two laundry buildings after 2000, and the purchase of two adjacent apartment buildings on 8th Street (referred to collectively as the Mori Building) in the 1990s. Additional discussion regarding the development and history of the project site is provided in Section IV.D, Cultural Resources, of this Draft EIR.

Today, the project site is made up of 153 residential buildings, 98 garage structures, five non-residential buildings, and lawn and landscaped areas. The residential development includes 1,187 dwelling units, consisting of 22 studios, as well as 451 one-bedroom, 638 two-bedroom, and 76 three-bedroom apartments. The residential buildings are two stories in height, with single-story garage structures dispersed throughout the property. The non-residential buildings include two single-story laundry buildings, a recreation room, a two-story leasing office, a security dispatch office, a maintenance storage room, and two maintenance workshops. The visual and physical centerpiece of the site is “The Mall,” a natural open space/drainage channel running from east to west with a perpendicular section bisecting the channel from north to south. Over time, the on-site buildings have aged, resulting in conditions typical of older developments (e.g., outdated development practices/codes, lack of integrated service facilities, visual signs of blight, etc.). An internal street network of winding roads, some of which are lined with mature trees, provides access throughout the project site and connects it to the adjacent community.

The project site’s topography is generally flat, with a gradual slope of 65 feet from the northwestern corner to the southeastern edge of the site. The average slope of the project site is 1.5 percent. Approximately 9.5 acres of the site are comprised of dispersed open space areas that include lawns and mature trees, with the largest open space area (The Mall) located within the central portion of the site. In addition to the contiguous open space, there are approximately 9.71 acres of “interstitial open space” composed of bits and pieces of open space formed by the gaps between buildings or courtyards within buildings. In some cases these spaces have grass or plantings, and in some cases these spaces are comprised of dirt surfaces. While some of these areas are grassy, because they are small, irregularly shaped, and often tightly sandwiched between buildings, roads, and parking lots, they do not significantly contribute to the open space at the project site. There are another approximately 17.25 acres of unfenced “yard space” which are composed of the areas between the façades of each building and the adjacent asphalt pathways. Both the “interstitial open space” and unfenced “yard space” areas include existing “courtyard” spaces, which in many cases consist of the yard space in the middle of a U-shaped building or the space in between two U-shaped buildings facing each other. In addition,

there are another 3.55 acres of private yards that were originally either interstitial open space or common open space that have been claimed by individual units as private open space through the use of fencing.

Given its location within a highly urbanized area, the project site is well served by a number of regional transportation corridors. Nearby freeways include the Golden State/Santa Ana Freeway (I-5), the Santa Monica Freeway (I-10), the Pomona Freeway (SR-60), and Hollywood Freeway (US 101). Adjacent major and secondary highways provide primary access to the site and include Olympic Boulevard, Soto Street, 8th Street, and Grande Vista Avenue. The project site is well-served by public transit, primarily in the form of bus service provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Montebello Bus Line System. In addition, Metro recently completed construction of an extension of the MetroRail Gold Line, which links the Boyle Heights Community with Union Station and other MetroRail lines that serve the Los Angeles region. The MetroRail Gold Line extension provides station stops in and near Boyle Heights, including stops at Soto Street/First Street and Indiana Street/Third Street, each within approximately 1.25 miles of the project site.

(2) Surrounding Uses

An aerial image of the project site in the context of the greater project vicinity, including the immediately surrounding uses, nearby freeways, Los Angeles River, and downtown, is shown in Figure II-2 in Section II, Project Description. As shown therein, the project vicinity is highly urbanized and built out with predominantly low- to mid-rise buildings. Land uses surrounding the site include a mix of residential, commercial, and industrial uses, as shown in the aerial map provided in Figure II-3 in Section II, Project Description.

Surrounding uses north of the project site include single-family residences, with a few interspersed retail uses across 8th Street. These residential uses extend northward to the I-5 Freeway, which forms a physical boundary within the project vicinity, with residential uses also located further to the north. In addition, a church is located adjacent to the project site on the south side of 8th Street. Immediately south of the project site along Olympic Boulevard are two schools and a pre-school, associated park/recreation facilities, a senior center, and a government service building, as well as commercial and light industrial uses. Industrial uses are also located south of Olympic Boulevard extending into an old industrial district that was developed along a network of railroad lines. Several railroad lines remain operational less than 1 mile south of the project site.

Uses east of the project site include a series of multi-family residential buildings operated by the Housing Authority of the City of Los Angeles in a development referred to

as Estrada Courts. Dense residential uses also extend further to the east, adding to the urban environment. To the west along Soto Street are commercial uses (retail stores, gas stations, fast-food restaurants, and an auto repair shop) as well as industrial uses, with industrial uses to the southwest and extending west to the Los Angeles River and further west to the downtown core. West of Soto Street, a five-story retirement home and three-story residential building are located on the north side of Olympic Boulevard, interspersed among commercial and industrial uses. Additionally, the Sears Boyle Heights property at the southwest corner of Soto Street and Olympic Boulevard includes an operating Sears store on the site of its former warehouse operations. This nine-story, 226-foot-tall complex (approximately 1,800,000 square feet) is designated as a Historic-Cultural Monument by the City of Los Angeles and is listed in the National Register of Historic Places. The southwest corner of Soto Street and Olympic Boulevard is also designated in the Boyle Heights Community Plan as a Major Opportunity Site and the City's Framework Element designates the intersection of Soto Street and Olympic Boulevard as a Regional Center. As such, this property and much of the underutilized and vacant land in the surrounding area are targeted for potential redevelopment and/or future new development. In addition, the Sears site, the area along Soto Street, and other land west, south, and southeast of the project site (but not including the project site) are located within the Adelante Eastside Redevelopment Project area, under the jurisdiction of the City's Community Redevelopment Agency (CRA). The purpose of the redevelopment project is to preserve industrial and commercial uses within the community through rehabilitation efforts and construction of new buildings while eliminating blight and creating jobs.

Most of the residential development in Boyle Heights was built between the late 1800s and the 1950s, and consequently much of the existing housing stock is old and outdated. The construction of four major freeways in the 1940s and 1960s segmented the community and has resulted in inadequacies in the services available in some areas. Overall, the City recognizes Boyle Heights as an area in need of economic development.¹

b. Regulatory Framework

(1) Local Plans, Policies, and Regulations

At the local level, several plans and regulatory documents guide development of the project site. The Boyle Heights Community Plan constitutes the local land use policy standards of the City of Los Angeles General Plan, and the City of Los Angeles Municipal Code (LAMC) governs land use through specific land use restrictions, design standards,

¹ *Boyle Heights Community Plan, City of Los Angeles, November 1998, pp. I-1–I-2.*

and building and safety codes. The project site is also located within a City of Los Angeles State Enterprise Zone (EZ) and the Central City Revitalization Zone.² These plans and associated regulatory documents and requirements are described below.

(a) City of Los Angeles General Plan

California state law requires that every city or county prepare and adopt a General Plan. The General Plan is a comprehensive long-term document that provides principles, policies, and objectives to guide future development.

In accordance with state requirements, the General Plan of the City of Los Angeles was originally adopted in 1974 and sets forth goals, objectives, and programs that address land use issues in the City. The General Plan consists of a series of documents or elements, including the seven State-mandated elements: Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, Public Facilities and Services, and the Citywide General Plan Framework Element. The Land Use Element is comprised of 35 local area plans known as Community Plans that guide land use at the local level. Of these, the Boyle Heights Community Plan includes the project site within its boundaries.

(i) The Framework Element of the General Plan

The Framework Element of the General Plan (General Plan Framework), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan. The General Plan Framework presents a strategy for long-term growth that sets a context to guide amendments of the City's Community Plans, zoning ordinances, and other pertinent programs. The General Plan Framework defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through the Community Plans and Specific Plans.

For purposes of this land use analysis, relevant chapters in the General Plan Framework include Land Use, Housing, Urban Form and Neighborhood Design, Open

² *The Los Angeles Revitalization Zone (LARZ) was created to foster economic development in areas that suffered damage during the civil unrest that occurred in L.A. County in 1992. The LARZ program ended in 1998, although tax credits are still available for certain businesses.*

Space and Conservation, Economic Development, and Transportation. Each of these chapters is discussed briefly below.

The General Plan Framework Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) throughout the City and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial centers. While the project site itself is not designated as a Neighborhood District, Community Center, Regional Center, Downtown Center, or Mixed-Use Boulevard, it is located adjacent to a designated Regional Center centered at the intersection of Soto Street and Olympic Boulevard.³ Regional Centers are designated as high-density areas and a focal point of regional commerce, identity, and activity. Floor area ratios (FARs) in such centers fall within the range of 1.5:1 to 6.0:1 and are characterized by buildings of 6 to 20 stories. Some are commercial in nature and other are of mixed uses. The density of Regional Centers also supports the development of a comprehensive and inter-connected network of public transit and services.

The General Plan Framework's Land Use Chapter encourages retention of the City's stable residential neighborhoods and proposes incentives to encourage the location of future growth in neighborhood districts, commercial and mixed-use centers, along boulevards, industrial districts, and in proximity to transportation corridors and transit stations. The General Plan Framework Housing Chapter seeks to contribute to stable, safe, and livable neighborhoods and improve access to jobs and neighborhood services.

The purpose of the Housing Chapter is to present an overview of the critical issues related to housing in Los Angeles, provide goals to guide future action, and specify policies to address housing issues. The adopted 2006–2014 Housing Element of the General Plan and the technical analyses and public input to the Framework Element focus on the following major housing-related issues: capacity for the development of future housing units; incentives and barriers to housing production; stability and enhancement of livable neighborhoods; the relationship between jobs and housing; housing quality and type; cost; and rehabilitation and reuse of existing building stock for all City residents of all income levels. The General Plan Framework provides policies to further the goals stated in the

³ *Citywide General Plan Framework, Los Angeles City Planning Department, Figure 3-1, Long Range Land Use Diagram: Metro, February 19, 2003, <http://planning.lacity.org/cwd/framwkw/chapters/03/F31MtoMp.pdf>, accessed January 5, 2011. As described in the Land Use Diagram, "...the community plans must be looked to for final determinations as to boundaries, land use categories, intensities and heights that fall within the ranges described by the Framework."*

2006–2014 Housing Element (adopted January 14, 2009), and provides policy direction for future amendments to the Housing Element.

The Urban Form and Neighborhood Design Chapter establishes the goals of creating: a livable city for existing and future residents; 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. “Urban form” refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. “Neighborhood design” refers to the physical character of neighborhoods and communities within the City. The General Plan Framework does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the updating of community plans. With respect to neighborhood design, 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 Open Space and Conservation Chapter calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply, and therefore suggests that vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

The Economic Development Chapter seeks to provide physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods.

The Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. The Transportation Chapter acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City’s economy, as well as the living environment of its citizens. This chapter stresses that transportation investment and policies will need to follow a strategic plan, including capitalizing on currently committed infrastructure and adoption of land use policies to better utilize committed infrastructure. The Transportation Chapter of the General Plan Framework is implemented through the Transportation Element of the General Plan.

Applicable policies and a consistency analysis of the project with each of the General Plan Framework chapters are provided in Table IV.G-1 starting on page IV.G-35 in the impact analysis below.

(ii) Boyle Heights Community Plan

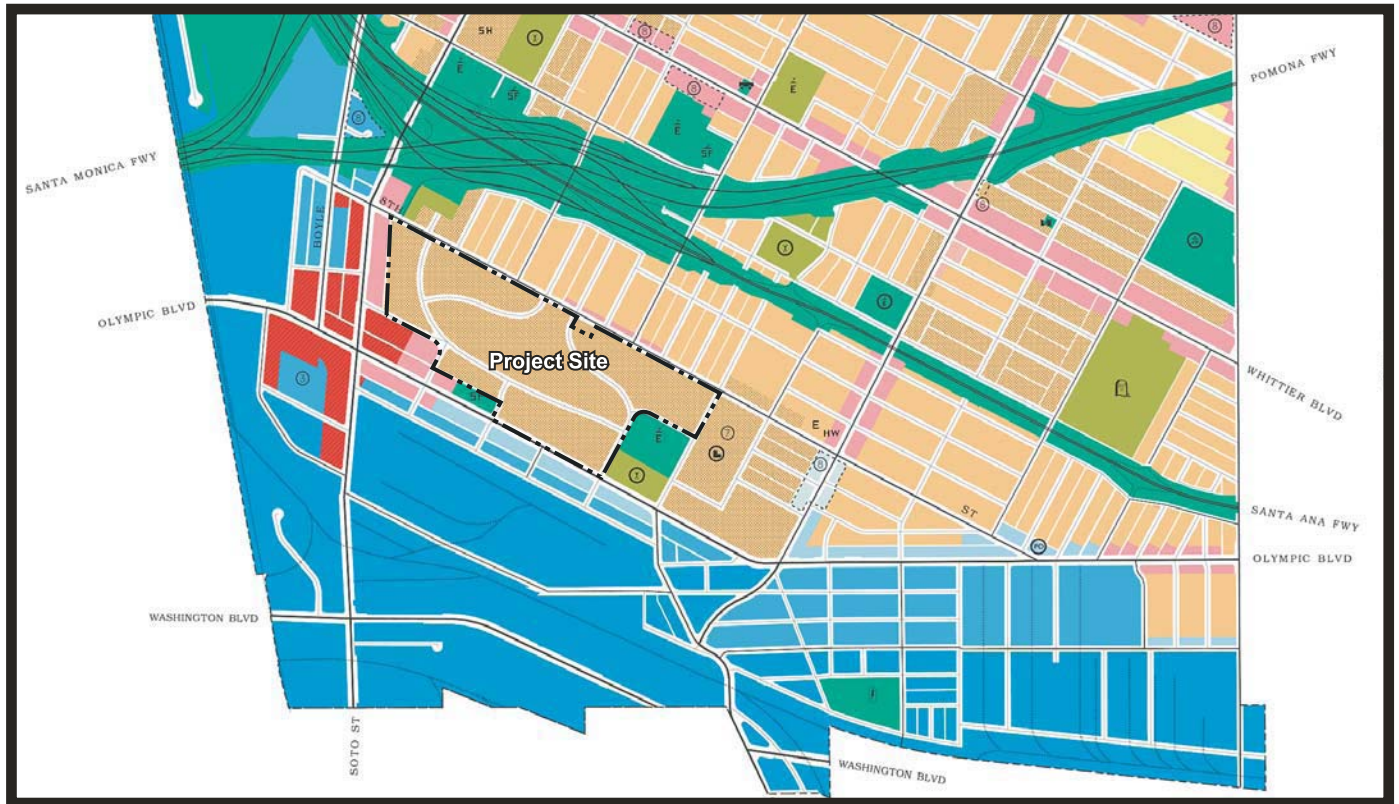
The land use policies and standards of the General Plan Elements and the General Plan Framework are implemented at the local level through the Community Plans. The intent of the Community Plans is to promote an arrangement of land uses, circulation, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people living in the community. Development on the project site is subject to the Boyle Heights Community Plan (Community Plan), last updated on November 10, 1998. The Community Plan sets forth objectives, policies, and programs to meet the needs of the Boyle Heights community through the year 2010.

As shown in Figure IV.G-1 on page IV.G-9, the Community Plan designates the entire project site for Low Medium II Residential (multi-family) uses. The Low Medium II Residential category typically consists of two detached single family structures, or duplexes on one lot, but also includes large older single-family residential structures that have been converted into triplexes and four-plexes or smaller apartment buildings with an average of about 6 to 8 units depending on the lot size. Adjacent properties are designated for residential development (Low Medium I and II) on the north and east; Public Facilities and Open Space adjacent to the southeast and south; industrial uses (Limited Industrial, Light Industrial, and Heavy Industrial) to the south, southeast, and west; and commercial uses (Neighborhood Commercial, Community Commercial, and Regional Center) to the immediate west and southwest. The Boyle Heights Community Plan outlines various land use and planning issues to be addressed through new development, improvement, and redevelopment efforts. As they relate most directly to the project, these include the following:

- The need to rehabilitate the existing low-density housing stock;
- The need to provide more affordable housing;
- Lack of open space in multi-family developments;
- Lack of convenient shopping services in portions of the community;
- Inadequate parking for commercial businesses;
- Inadequate transition between commercial and residential uses;
- The need to provide buffers between residential and industrial uses;

LAND USE

RESIDENTIAL¹	CORRESPONDING¹² ZONES	CORRESPONDING¹² ZONES
LOW DENSITY		MULTIPLE FAMILY
 LOW	RE9,RS,R1 RD5,RD6	 LOW MEDIUM I⁹
		 LOW MEDIUM II⁹
		 MEDIUM
		R2,RD4,RD3
		RD2,RD1.5
		R3
COMMERCIAL¹		INDUSTRIAL¹
 HIGHWAY ORIENTED/HWY ORIENTED & LTD COMM	C1,C2, RAS3,P	 COMMERCIAL INDUSTRIAL
 NEIGHBORHOOD COMMERCIAL	C1,C2,C4, RAS3,P	 LIMITED INDUSTRIAL
 COMMUNITY COMMERCIAL	C2,C4,RAS3, P,PB	 LIGHT INDUSTRIAL
 REGIONAL CENTER	C2,RAS3, P,PB	 HEAVY INDUSTRIAL
		CM,P
		CM,MR2,M2,P
		MR2,M2,P
		OPEN SPACE, PUBLIC FACILITIES
		 OPEN SPACE
		 PUBLIC FACILITIES¹⁰
		OS,A1
		PF



Boyle Heights Mixed Use Community Project



Figure IV.G-1
Boyle Heights Community Plan Designations

- The need to mitigate and minimize pedestrian and vehicular conflicts along commercial corridors and at the Olympic and Soto intersection;
- Preserve the existing low-scale character of the community;
- Preserve the continuity of the streetscape and enhance community identity; and
- Mitigate the adverse impacts of new high-density residential development such as bulk, open space, and parking.

The Boyle Heights Community Plan also identifies land use assets and development opportunities to be pursued within the community. As they relate most directly to the project, these include the following: proximity and access to downtown and the industrial base; potential for expansion and enhancement of commercial activity around existing focal points; convenient access to regional transportation network; removal of underutilized or substandard structures to develop pedestrian-oriented uses along commercial corridors and community focal points; and development of the nearby designated Major Opportunity Site, which includes the Sears site at Olympic Boulevard and Soto Street and properties west of the project site, which are targeted for master planned development with an integrated mix of retail, office, restaurant, entertainment, and residential uses. In addition, the Community Plan identifies opportunities for high-density mixed use development near future MetroRail stations.⁴

The Community Plan also sets forth objectives and policies that address future development needs in Boyle Heights and that address the community issues and opportunities discussed above. The objectives and policies most applicable to the proposed project are provided below in Table IV.G-2 starting on page IV.G-52 within the impact analysis.

(b) Los Angeles Municipal Code (LAMC)

The City of Los Angeles Planning and Zoning Code (Chapter 1 of the LAMC) regulates development through land use designations and development standards. As

⁴ *In the context of future MetroRail stations, the Community Plan references the proposed extension of the Metro Red Line. At the time the Community Plan was prepared, the Red Line (which connects Downtown Los Angeles to North Hollywood) was intended to be expanded beyond its eastern terminus at Union Station to East Los Angeles. However, work on the planned extension of the Red Line was suspended by Metro in January 1998 due to financial constraints. Although the Red Line extension was abandoned, the Gold Line East extension now provides the connections necessary to serve the transit needs of the Eastside region. Like the formerly proposed Red Line extension, the Gold Line extension includes several station stops in and near Boyle Heights.*

shown in Figure IV.G-2 on page IV.G-12, the project site is zoned Restricted Density Multiple Dwelling Zone and Height District 1 (RD 1.5-1). Uses permitted in the RD 1.5 zone include single, duplex, and multi-family housing including apartments; public parks, playgrounds, and community centers; and garages, recreation rooms, and accessory uses. This zoning designation allows residential densities of approximately 29 units per acre (based on a minimum area of 1,500 square feet per unit) and a FAR of 3:1. Within the RD 1.5 zone, Height District 1 allows building heights of up to 45 feet and FARs of up to 3.0:1. Setback requirements in the RD 1.5 zone are 15 feet minimum for front and rear yards, with varied side yard requirements based on lot size that include a 3-foot minimum plus 1 foot for each story above the second story, up to 16 feet.

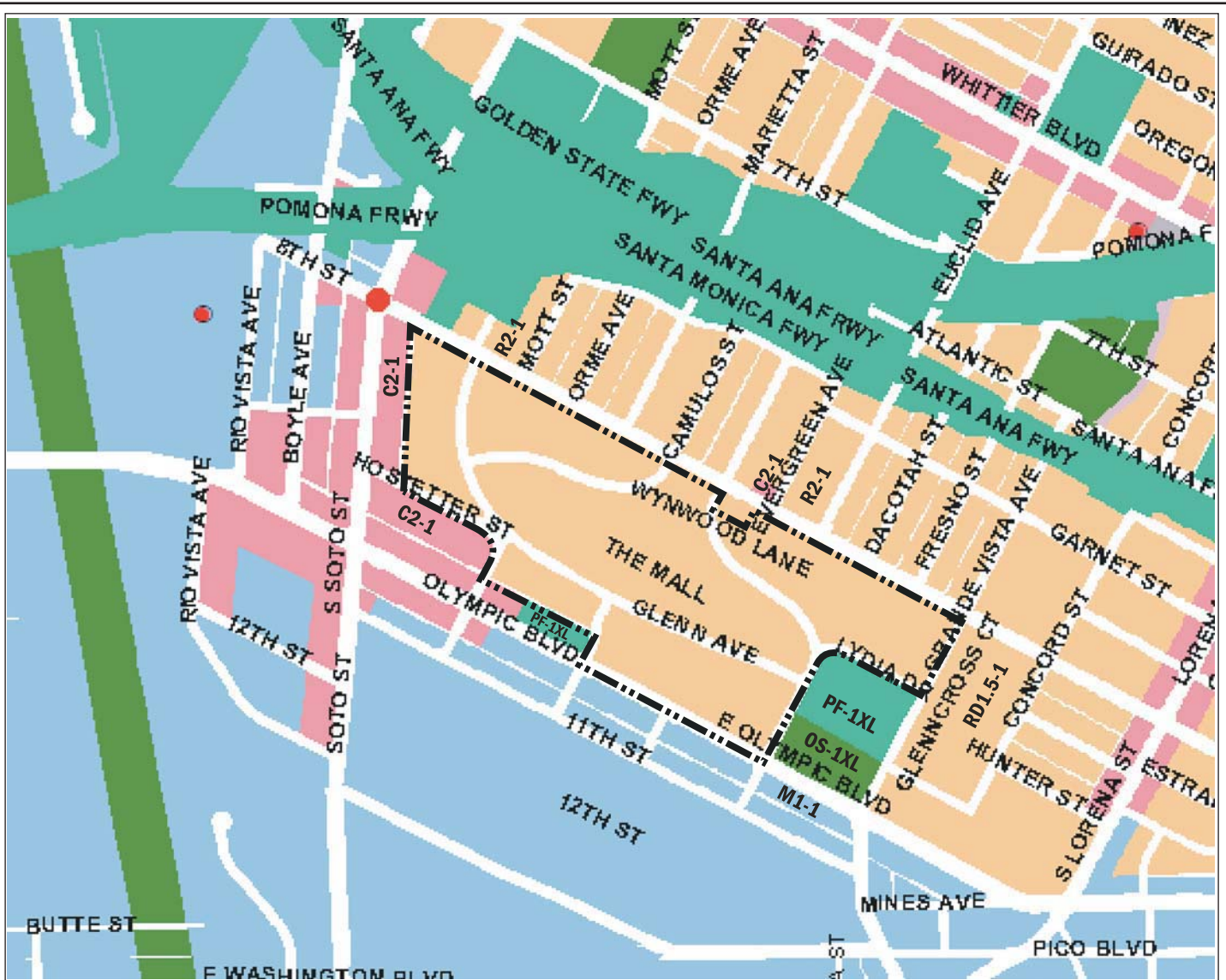
Under the provisions of LAMC Section 12.22 A 25, the project site is eligible for a density bonus of up to 35 percent if development meets certain standards for the provision of affordable housing. Such a density bonus would increase the allowable density for the RD 1.5-1 zone to up to approximately 39 units per acre, depending on the number and affordability level of affordable units.

As shown in Figure IV.G-2, the properties surrounding the project site are zoned with a variety of residential, commercial, and manufacturing designations. Properties to the north and east are designated with a variety of residential designations, primarily RD 1.5-1 and Two-Family Dwellings (R2-1), interspersed with pockets of Commercial (C2-1) sites along 8th Street and other major roadways. Some of the C2 sites include [Q] conditions that specify special lighting limitations, landscaping, and signage requirements required for compatibility with nearby residential development. Zoning to the south includes Public Facilities (PF-1XL) and Open Space (OS-1XL) adjacent to the site, and an array of Limited and Light Industrial (M1-1 and M2-1, respectively) designations south of Olympic Boulevard, with Heavy Industrial (M3-1) further to the south. Zoning west and southwest of the project includes C2-1, M2-1, and M3-1.

Nearly all of the properties surrounding the project site, like the project site itself, fall within Height District 1, with the exception of the adjacent PF and OS properties, which are designated as Extra Limited Height District 1. As noted above, Height District 1 allows development with a FAR of up to 3.0:1 for residential zones, with a 45-foot height limit in RD 1.5 and a 33-foot limit in the R2 zone. Within commercial and industrial zones, Height District 1 allows a FAR of 1.5:1 and unlimited building heights.

(c) East Los Angeles Enterprise Zone

The State of California Legislature approved the Enterprise Zone Act in 1984 to establish a program to provide tax incentives and benefits to stimulate employment generation, business and industrial growth, and investment in economically depressed areas throughout the State. An Enterprise Zone (EZ) is an area in which businesses are



Generalized Zoning

- OS
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, R4, R5
- ADP, C1, C1.5, C2, C4, C5, CR, CW, LASED, WC
- CM, MR, CCS, M1, M2, M3, SL
- P, PB
- PF
- HILLSIDE
- PROJECT SITE

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Figure IV.G-2
Existing Zoning Map

eligible for special tax incentives and benefits not available to businesses located outside the EZ.

The City of Los Angeles has three State Enterprise Zones, administered by the Community Development Department: the Los Angeles EZ, the Harbor EZ, and the Eastside State (East Los Angeles) EZ in which the project site is located. The City of Los Angeles offers the following economic incentives to businesses within an EZ: hiring credits, sales and use credits, expense and interest deductions, DWP rate discount, fee waivers for site plan review of major development projects, sewer facility discounts, and reduced parking rates.⁵ The goal of the incentives is to stimulate business investment and growth and increase employment opportunities within economically disadvantaged areas of the City. Additionally, special height limit districts apply to EZs that increase the total floor area allowed. Use of these height limits requires a zone change; however, no such zone change has been implemented at the project site.

(d) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist, Guidance for Entitlement Review (Walkability Checklist) was created by the City's Urban Design Studio of the Department of City Planning and specifies urban design guidelines that are generally applicable to all projects requiring discretionary approval for new construction. The Walkability Checklist consists of objectives, goals, and implementation strategies regarding various design elements that are intended to improve the pedestrian environment, protect neighborhood character, and promote high-quality urban form. Such topics as sidewalks, crosswalks/street crossings, on-street parking, utilities, building orientation, off-street parking and driveways, on-site landscaping, building façades, and building signage and lighting are addressed and should be considered in the design of a project.

(e) Other City of Los Angeles Environmental Policies, Ordinances and Plans

The City of Los Angeles has adopted various environmental policies, ordinances and plans, such as the City Solid Waste Management Policy Plan, Source Reduction and Recycling Element and the Clean Air Program. These plans, policies and ordinances are discussed throughout Section IV, Environmental Impact Analysis, of this Draft EIR in their respective environmental topic sections.

⁵ *City of Los Angeles Community Development Department, State Enterprise Zones, www.ci.la.ca.us/CDD/bus_statecred.html, accessed January 4, 2011.*

(2) Regional Plans and Applicable Policies

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP), Growth Vision Report, and Regional Comprehensive Plan (RCP); the Los Angeles County Congestion Management Plan (CMP), administered by the Los Angeles County Metropolitan Transportation Authority (Metro), which regulates regional traffic issues; and the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), which addresses attainment of State and federal ambient air quality standards throughout the South Coast Air Basin.

(a) SCAG Regional Transportation Plan, Growth Vision Report, and Regional Comprehensive Plan

SCAG is the federally designated metropolitan planning organization for six southern California counties, including the County of Los Angeles. SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

(i) Regional Transportation Plan

SCAG's 2008 RTP, adopted in May 2008, presents a long-term transportation vision through the year 2035 for the SCAG region. The 2008 RTP was produced through a balanced approach that considered system preservation, system operation and management, improved coordination between land use decisions and transportation investments, and strategic expansion. Specific issues addressed within the 2008 RTP include mobility, air quality, climate change, energy, transportation financing, security and safety, environmental justice and mitigation, revenues and expenditures, transportation conformity, implementation and monitoring, corridor preservation, and future connections and growth. The RTP provides a basic policy and program framework for long-term investment in the regional transportation system in a coordinated, cooperative, and continuous manner. Transportation investments in the SCAG region that receive State or federal transportation funds must be consistent with the RTP and must be included in the Regional Transportation Improvement Program (RTIP) when ready for funding. The RTP goals and policies that relate to the project are discussed in Table IV.G-3 starting on page IV.G-65 in the analysis of impacts below. The RTP also includes population, housing, and employment forecasts that provide advisory information to local jurisdictions for use in planning activities. RTP projections for the project area are addressed in Sections IV.I.1, Employment; IV.I.2, Housing; and IV.I.3, Population, of this Draft EIR.

(ii) *Growth Vision Report*

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has collaborated with interdependent sub-regions, counties, cities, communities, and neighborhoods in a process referred to by SCAG as Southern California Compass, which resulted in the development of a shared Growth Vision Report for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. SCAG began Compass in 2002, spearheaded by the Growth Visioning Subcommittee, which consists of civic leaders from throughout the region. The shared regional vision sought to address issues such as congestion and housing availability, which may threaten the region's livability.

The underlying goal of the growth visioning effort is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income. To organize the strategies for improving the quality of life in the SCAG region, a series of principles was established by the Growth Vision Subcommittee. These goals are contained in the Growth Vision Report. The four principles are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. Decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies also are provided as a way to achieve each of the principles. The project's consistency with the Growth Vision goals is discussed in Table IV.G-3 starting on page IV.G-65 in the analysis of impacts below.

The Compass Growth Vision notes that limitations on the amount of undeveloped land suitable for development may hinder the ability to accommodate new housing and jobs within the region. The report determined that under current adopted general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land. Infill, or new development in already developed areas, will be relied upon to provide locations for nearly half of the anticipated new housing region-wide. The Compass Growth Vision concludes that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure will be of enormous benefit in accommodating future growth, while also recognizing that incremental and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to individual cities.⁶

⁶ *Southern California Association of Governments, Southern California Compass Blueprint Growth Vision Report, June 2004, www.compassblueprint.org/files/scag-growthvision2004.pdf, accessed January 4, 2011.*

In addition, the Compass Blueprint 2% Strategy provides guidance for how and where SCAG can implement the Growth Vision for Southern California's future. It calls for modest changes to current land use and transportation trends on only 2 percent of the land area of the region. Directing the changes to the selected 2 percent of the land identified produces the greatest policy achievement for the least land affected. The selected 2 percent sites located in the vicinity of the Project site are identified on the 2% Strategy Opportunity Areas Map for the City of Los Angeles—Central Area, shown in Figure IV.G-3 on page IV.G-17. As shown therein, the Boyle Heights Community Plan Area, including the project site, is located within a Compass 2% Strategy Opportunity Area.

(iii) Regional Comprehensive Plan

SCAG has also prepared and issued the 2008 Regional Comprehensive Plan in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.⁷ The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Blueprint Growth Vision and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the RCP is not used in SCAG's IGR process.

⁷ SCAG, *2008 Regional Comprehensive Plan*, www.scag.ca.gov/rcp/, accessed January 4, 2011.

Rather, SCAG reviews new projects based on consistency with the 2008 RTP and Compass Growth Vision.⁸

(b) Los Angeles County Congestion Management Program

In 1990, California voters approved Proposition 111, which established the Congestion Management Program (CMP). Under Proposition 111, each county is required to designate an agency or representative body that is responsible for administering the CMP at the county level. The designated CMP agency is charged with helping to coordinate land use, air quality, and transportation planning among the local jurisdictions and to prepare a CMP that helps manage traffic levels on a long-term basis.

The Los Angeles County Metropolitan Transportation Authority is the designated CMP agency for Los Angeles County and is responsible for administering and implementing the 2004 CMP for Los Angeles County. The 2004 CMP includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The 2004 CMP guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either peak hour be evaluated. The guidelines also require evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Please refer to Section IV.K, Traffic, Access, and Parking, of this Draft EIR for an analysis of the project's consistency with the CMP.

(c) SCAQMD Air Quality Management Plan

The SCAQMD is responsible for bringing air quality in the South Coast Air Basin (Basin) into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. The SCAQMD's AQMP, last amended in 2007, presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control

⁸ Prior to publication of the 2008 RTP, projects considered to be regionally significant based on SCAG criteria were required to provide an analysis of consistency with the 1996 RCPG goals and policies. However, SCAG now considers the RCPG defunct.

measures aimed at reducing emissions. Please refer to Section IV.B.1, Air Quality, of this Draft EIR for an analysis of the project's consistency with the AQMP.

3. Environmental Impacts

a. Methodology

(1) Land Use Consistency

The analysis of land use consistency impacts considers whether the proposed project would be in substantial conformance with applicable plans, policies, and regulations that govern land use on the project site. The determination of land use consistency is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the project site. CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. A project is considered not inconsistent with the provisions of the identified regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary goals of the land use plan or policy. If a project is determined to be inconsistent with specific objectives or policies of a land use plan, although not inconsistent overall with the land use goals of that plan and would not preclude the attainment of the primary intent of the plan, the project generally would be considered consistent with the plan.

(2) Land Use Compatibility

The analysis of land use compatibility determines whether the proposed project would be compatible in terms of use, size, density, intensity, scale, and other physical and operational factors with surrounding land uses and development. The analysis is also intended to determine whether existing communities or land uses would be disrupted, divided, or isolated by the proposed project with consideration given to the duration of any disruptions. The compatibility analysis is based on field surveys, aerial photography, and land use maps in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form, based on a comparison of land use relationships in the project area under existing conditions at the time of the Notice of Preparation (NOP) to the conditions that would occur with project implementation.

(3) Urban Decay

While under CEQA, economic and social impacts of a project (though they may be included in a CEQA document) are not to be treated as "significant" impacts on the physical environment, to the extent that there is a direct or indirect connection between a change in

economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is significant. For example, this analysis would be considered when there is a potential for a proposed new retail development to trigger economic competition with existing retailers and other commercial uses in the project's local community. If existing retailers and/or other commercial uses are adversely affected by this competition, declines in sales could directly result in and/or lead to disinvestment, business closures, abandonment, and other forms of physical decay that are indicative of urban decay. Urban decay is the phenomenon whereby a neighborhood or local area falls into physical deterioration. Forms of physical deterioration can include abnormally high business closures, long-term vacancies, and/or abandoned and dilapidated buildings.

The analysis of the proposed project's urban decay impacts is based on the Urban Decay Analysis prepared for the project by HR&A Advisors, Inc., included as Appendix H to this Draft EIR. The Urban Decay Analysis focuses on the project's proposed retail and restaurant/dining uses as the other proposed uses of the project (i.e., residential, office, and civic uses) are not anticipated to result in urban decay impacts. The Urban Decay Analysis evaluates whether development of the retail uses, alone and in combination with other planned retail projects in the same general vicinity, would result in such intense competition that there is likely to be a significant adverse economic impact on existing retail developments in the Boyle Heights market area which could foreseeably lead to urban decay as the concept has been defined by court decisions interpreting CEQA. Methodologically, the potential for such an impact is determined in a given market area through a comparison of the projected growth in demand for retail goods, as measured by the change in supportable retail space for particular retail store categories, with the amount of proposed additions to the supply of retail space. In this particular context, the analysis focuses on whether the proposed amount of floor area in each major retail and dining use category planned for the project exceeds the likely increase in demand for those same uses within the relevant market area(s) serving the project, where demand is measured by the anticipated growth in population and per capita personal income that would be available for expenditures on the specified retail goods and dining activities. If the amount of retail space planned for the project, together with proposed retail space for comparable uses in other planned projects within the same time frame, is equal to or less than the increase in space that can be supported by projected increases in future demand, it is reasonable to conclude that the proposed project is not exerting significant adverse competitive pressures that could potentially lead to urban decay. Conversely, if this measure exceeds anticipated growth in demand, the resulting competitive conditions could challenge existing retailers and restaurateurs to such a degree that net sales could be attracted away from their existing establishments without their likely replacement by sales from new sources of demand. Under such circumstances, further analyses is required to assess whether it is foreseeable that this draining of sales from existing businesses could result in significant

disinvestment, business closures, store abandonment and other forms of physical deterioration leading to urban decay.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to land use. These questions are as follows:

Would the project:

- Physically divide an established community?
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

(1) Land Use Consistency

In the context of the Appendix G sample questions, the *City of Los Angeles CEQA Thresholds Guide* states that the determination of significance regarding land use consistency impacts shall be made on a case-by-case basis, considering the following factors:

- 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.

Based on the factors presented above, the proposed project would be considered to have a significant land use consistency impact if:

- The project is found to be in substantial conflict with the City's adopted General Plan, the Boyle Heights Community Plan, or the whole of relevant environmental policies in other applicable plans.

(2) Land Use Compatibility

In the context of the Appendix G sample questions, the *City of Los Angeles CEQA Thresholds Guide* states that the determination of significance regarding land use compatibility impacts shall be made on a case-by-case basis, considering the following factors:

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

Based on the factors presented above, the proposed project would be considered to have a significant land use compatibility impact if:

- The project would substantially and adversely change the existing land use relationships between the project site and existing off-site uses or would disrupt, divide, or isolate existing neighborhoods or communities.

(3) Urban Decay

Neither Appendix G of the CEQA Guidelines nor the *City of Los Angeles CEQA Thresholds Guide* specifies a threshold or consideration factors with regard to urban decay. For the purposes of this analysis, the proposed project would be considered to have a significant impact associated with urban decay if:

- The project would adversely affect the viability of retail uses within the market area that the proposed project is intended to serve such that the existing retail uses could fall into long-term physical disrepair.

c. Project Design Features

As described in more detail in Section II, Project Description, of this Draft EIR, the project would entail the redevelopment of an approximately 68.8-acre property currently developed with 1,187 units of multi-family rental housing. The proposed project would replace existing residential development with a new mixed-use residential/commercial community that would include rental units and increased homeownership opportunities, complemented by neighborhood-serving retail and office space, civic uses, green/open

space, and amenities. Specifically, the project would include up to 4,400 residential units comprised of no less than 1,200 rental units and up to 3,200 condominium units, and 325,000 square feet of neighborhood-serving retail, office, and civic uses. Upon completion of the project, there would be no net loss of rental housing units within the project site as compared to current conditions. In addition, the project would include a civic plaza, an expansive central park, active parks, neighborhood greens, neighborhood playgrounds, and landscaped courtyards and pathways. The green space and recreational amenities would include approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, a total of approximately 24 acres of usable open space would be provided, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. The project would also include 18.2 acres of planted streetscape and yard areas. Please refer to Table IV.J-13 in Section IV.J.4, Parks and Recreation, for a breakdown of the project's open spaces. Upon completion of the project, the total amount of open space at the ground level, including publicly accessible open space, unfenced yards, streetscape, interstitial spaces, paseos, and courtyards would be 37.25 acres, compared to 36.43 acres of comparable space that currently exists on the project site. Overall, the project is intended to provide a walkable community with modern amenities and a high-quality design that promotes sustainability. A breakdown of each of the proposed land uses is provided in Table II-1 in Section II, Project Description, of this Draft EIR. Additional components of the proposed project relevant to the analysis of land use impacts are described below.

(1) Required Approvals

As described in more detail below, approvals required for development of the proposed project may include, but are not limited to, the following:

- General Plan Amendment pursuant to LAMC Sections 11.5.6 and 12.32(E) to:
 - Revise the project site's land use designation from Low Medium II Residential to Medium Residential and Regional Center;
 - Amend the Boyle Heights Community Plan by adding a General Plan policy specific to the project site that would require future approval of a Specific Plan before development could occur and then provide flexibility in the types of uses permitted under the General Plan;
 - Amend the Regional Center and Medium Residential land use designations in the Boyle Heights Community Plan to reflect that the Boyle Heights Mixed

Use Specific Plan Zone (BHMUSP) is a consistent and permitted zone under the Regional Center and Medium Residential land use designations;

- Adoption of the Boyle Heights Mixed-Use Community Project Specific Plan pursuant to LAMC Section 12.32(E);
- Zoning Code Amendment/Zone Change pursuant to LAMC Section 12.32(E) and (F) to:
 - Create the Boyle Heights Mixed-Use Specific Plan Zone (BHMUSP), requiring all future development on the subject site to conform to the Boyle Heights Mixed-Use Community Project Specific Plan;
 - Zone change of the project site from RD 1.5-1 to the Boyle Heights Mixed-Use Specific Plan Zone;
- Development Agreement pursuant to California Government Code §65864, et seq. (to memorialize various project design features and commitments, and vest rights for project development);
- Subdivision Map;
- Haul Route approval, as necessary;
- Coverage under the National Pollution Discharge Elimination System (NPDES) Permit by the Los Angeles Regional Water Quality Control Board;
- Issuance of all required ministerial permits necessary to implement the project (e.g., grading, building, certificate of occupancy, water, sewer, storm drain, etc.) by the City of Los Angeles; and
- Any additional actions as may be deemed necessary.

In order to implement the proposed project, various other approvals, permits and actions will be required by the City of Los Angeles and other responsible agencies. City agencies, departments, commissions, and councils that may use this EIR in their decision-making process include the Department of Building and Safety, the Planning Department, the Department of Public Works, the Planning Commission, and the City Council. Other agencies may include the Regional Water Quality Control Board and the South Coast Air Quality Management District.

(2) Proposed Specific Plan

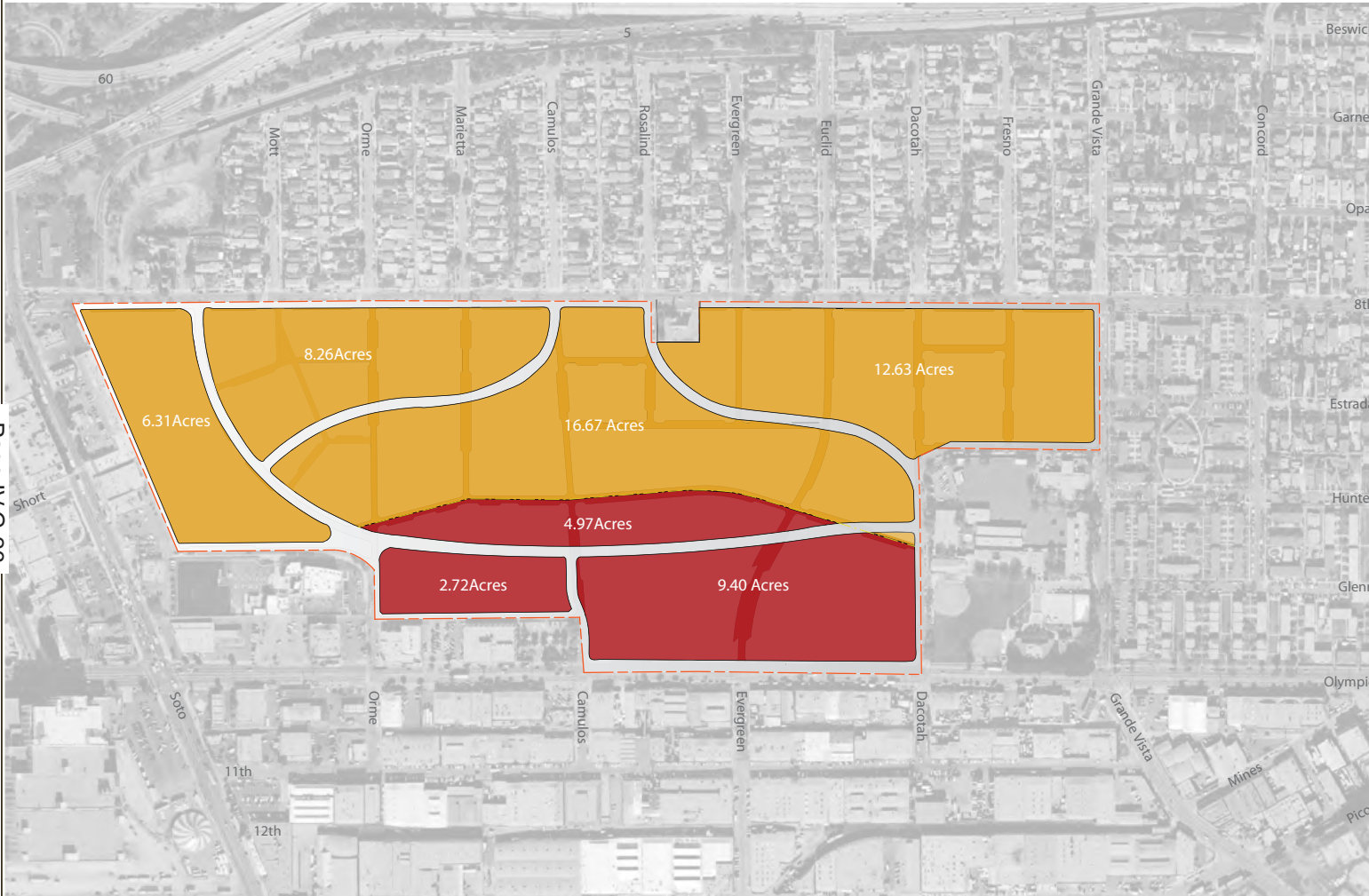
The project would be implemented according to a proposed Specific Plan, entitled the “Boyle Heights Mixed-Use Community Project Specific Plan,” which would regulate the

nature of future development on the project site. As described below, discretionary approval of the new Specific Plan is sought in association with the proposed project, and its adoption by the City would occur in conjunction with a General Plan amendment and zone change, also requested as part of the project. As shown in Figure IV.A-5 in Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR, the Specific Plan area is divided into 13 blocks designated Block A through Block M. The proposed General Plan amendment would revise the project site's land use designation from Low Medium II Residential to Regional Center and Medium Residential. Specifically, Blocks C, D, E, F, G, H, I, J, K, and L, which would be primarily residential in character, would be designated as Medium Residential. Blocks A, B, and M, which are considered the mixed-use/residential/retail/office blocks of the project, would be designated as Regional Center. The proposed land use designations are depicted in Figure IV.G-4 on page IV.G-26.



As indicated above, the proposed Specific Plan would establish a new zoning designation for the project site, referred to as the Boyle Heights Mixed-Use Specific Plan Zone. Via implementation of this zone, the Specific Plan would govern the permitted uses, permitted total floor area of such uses, maximum development density, building heights, yards, and setbacks throughout the project site. It would also establish standards for parking, loading requirements, and other related development characteristics. As in other types of mixed-use zones in the City, such as the Residential/Accessory Services (RAS4) zone, the total floor area permitted on the project site would be limited to three times the area of the net site area (i.e., a FAR of 3:1). The maximum FAR for any individual Block may be 6:1 so long as the aggregate floor area developed over the entire project site does not exceed 3:1. Building heights would be consistent with Height District 1, except for locations along the northern and northeastern edges of the site, which would be similar to the more restrictive heights of the 1L and 1VL districts to respect the existing residential uses in the neighboring areas. As with other Specific Plans adopted for areas throughout the City, the Boyle Heights Community Project Specific Plan would supersede any conflicting requirements specified in the City's zoning code.

(3) Transfers of Floor Area

The project would allow for some flexibility in terms of the permitted type and amount of each proposed land use, as well as the location, size, height, and style of new buildings. Guidelines and limitations have been defined as part of the proposed Specific Plan described above. The floor area caps of 150,000 square feet of office space and 200,000 square feet of retail space, out of a total maximum of 300,000 commercial square feet, would allow for the project to respond to changing market demands and best meet the needs of the community. For the purposes of this analysis, conceptual development scenarios have been defined to demonstrate hypothetical land use mixes that could occur under a project in which either the proposed office space or the proposed retail space is



Proposed Area Overlay

-  Residential-Medium Density (R3-with Density Bonus) (43.9 Acres Total)
Total Units - 2940
67 Units per Acre
Total FAR - N/A
Net Area - N/A
FAR - N/A
Civic Space - 25,000sf
-  Commercial-Regional Center (C-2) (17.1 Acres Total)
Total Units - 1460
85.35 Units per Acre
Total FAR - 1,991,194
Net Area - 744,876 sf
FAR - 2.67



Boyle Heights Mixed-Use Community Project

Figure IV.G-4
Proposed Land Use Designations

maximized. Please refer to Table II-2 in Section II, Project Description, of this Draft EIR. Additionally, to illustrate the anticipated general layout of proposed development, a conceptual illustration of the potential building arrangement and building heights under the conceptual plan is shown in Figure II-7 in Section II, Project Description, of this Draft EIR. While the majority of the new buildings on-site would include residential uses (in some cases exclusively), some buildings may be exclusively commercial, and some would contain mixed uses, with commercial or retail space and residential units in the same structure. The general locations of the proposed ground floor uses, which would influence the pedestrian environment throughout the site, are shown in Figure II-8 in Section II, Project Description, of this Draft EIR.

(4) Building Heights and Massing

The majority of the new buildings would range in height from two to seven stories (approximately 24 feet to 75 feet). In addition, up to three buildings could be as tall as 18 stories (approximately 210 feet), and up to three buildings could be as tall as 24 stories (approximately 260 feet). The Specific Plan and associated zone change would establish new height restrictions throughout the project site. As illustrated in Figure II-9 in Section II, Project Description, a transitional height zone extending a distance of 70 feet into the site interior would limit building heights to 35 feet along the north and northeastern site perimeters of the project site, closest to adjacent low density residential uses. The allowable height would step up to 64 feet moving toward the center of the site, transitioning to a 74-foot height limitation along the edges of the central park and along the Evergreen Street retail frontage. The creation of these transitional height zones would maintain low- and mid-rise buildings in the northern and northeastern areas of the site and concentrate the tallest structures furthest from nearby low-rise residences, resulting in a project design that promotes visual compatibility with off-site uses.

(5) Design Guidelines and Standards

Project development would also be subject to Design Guidelines and Standards to be implemented as part of the proposed Specific Plan. The Design Guidelines and Standards provide the urban design vision and development standards and guidelines for each block in the Specific Plan area relating to: block layout, building placement and scale, building types, frontage types, building design, parking design, sustainability, landscaping, and service and auxiliary functions. The Design Guidelines and Standards also present the vision, guidelines, and standards for open space and street spaces within the Specific Plan area, describe the proposed infrastructure enhancements, and lay out the construction phasing plan. Key components of the Design Guidelines and Standards relevant to the assessment of land use impacts are discussed below.

(a) Block Area Development Standards

As shown in Figure IV.A-3 in Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR, the Specific Plan area is divided into 13 blocks designated Block A through Block M. The following discussion provides a more detailed, block-by-block summary of the key land use characteristics of each block, as set forth in the Design Guidelines and Standards.

Block A would be a mixed-use block with retail frontage and diagonal parking required along the ground floor of the Evergreen Street frontage internal to the project site. Block A would have primarily residential development along the northern, western, and southern street frontages, with retail/office uses permitted at the ground-level on the southern frontage facing Olympic Boulevard, and retail required at the ground level on the western frontage of the block.

Block B would be a mixed-use block with retail uses required along the ground floor of the eastern portion of the block internal to the project site. Block B would have primarily residential development along the northern and western street frontages and retail uses would be required on the ground floor along the southern frontage along Olympic Boulevard. Two high-rise buildings may be accommodated along the Olympic Boulevard frontage, including a building at the southeast corner of the block (at Olympic Boulevard and Evergreen Street) not to exceed a height of 210 feet and a floor plate of 12,500 square feet, and a building at the southwest corner of the block (at Olympic Boulevard and Camulos Street) not to exceed 260 feet and a floor plate of 12,500 square feet. A free-standing parking garage may also be accommodated within the central portion of Block B. The garage may be built separately from the buildings on Block B, but would eventually be screened and designed as per Specific Plan design criteria, and would be topped with courtyard space to provide additional open space.

Block C would also be a mixed-use block that may accommodate a high-rise building not to exceed 260 feet in height and a 12,500-square-foot floor plate at the eastern end of the central park. Block C would also include a neighborhood playground space along the southern block frontage that would connect the central park with the off-site school and recreation area to the east. Block C would link to and include design features characteristic of the Arroyo Walk, a linear stretch of open space that would weave through and link the various open space systems on the project site, generally following the northern contour of Glenn Avenue. In addition to serving as a major pedestrian corridor and connecting feature throughout the project site, the Arroyo Walk would provide a stormwater management system of bioswales, biofiltration, and infiltration, native planting, heritage oaks, and walking/jogging trails. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street. Restrictions within Block

C would encourage a mix of building heights and scales while ensuring that heights along 8th Street maintain compatibility with the character and scale of the residential neighborhood to the north.

Block D would be a primarily residential block designed to reflect the neighborhood character north of 8th Street. Commercial uses may be located on the ground floor. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street. Residential units developed along the eastern frontage would not exceed 35 feet in height. Rowhouses and small multi-family buildings would be encouraged along 8th Street (see discussion of Building Design and Architecture, below).

Block E would be a primarily residential block that is designed to respect the neighborhood character north of 8th Street. A neighborhood park open space easement would be required on the north frontage along 8th Street.

Block F would be a mixed-use block that would step up in height toward the central park, away from 8th Street. The eastern terminus of the central park would occupy the southern portion of the block and would incorporate Arroyo Walk features. Block F would be flanked to the east by a linear neighborhood park open space easement that would link to the central park and open up the inside of the project site for access from 8th Street. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street, except within the neighborhood park open space easement.

Block G would be another mixed-use block that would step up in height toward the central park, away from 8th Street. The central park would occupy the southern portion of the block and would incorporate Arroyo Walk features. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street and adjacent to the existing church (not part of the Specific Plan) that abuts the block.

Characterized by its civic functions, Block H would be reserved for community building(s), a neighborhood park open space easement fronting 8th Street to the north, and the central park open space easement to the south. The design of Block H is only minimally regulated, in the interest of maintaining flexibility in designing the most beneficial civic use. The central park open space easement would incorporate Arroyo Walk features.

Block I would be a mixed-use block that would step up in height toward the central park open space easement, away from 8th Street. The central park open space easement would occupy the southern portion of the block and would incorporate Arroyo Walk features. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street. Block I may accommodate a high-rise building not to

exceed 210 feet in height and a 12,500-square-foot floor plate adjacent to the central park open space easement.

Block J would be a mixed-use block that would step up in height toward the central park, away from 8th Street. The central park open space easement would occupy the southern portion of the block and would incorporate Arroyo Walk features. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street. However, taller building heights would be allowed along the edge of the Central Park.

Block K would be a mixed-use block with a neighborhood park open space easement on the northwestern perimeter fronting 8th Street. The neighborhood park open space easement would link to the western terminus of the central park open space easement, providing a connection to the open space network within the project site. This connection would be enhanced through the incorporation of Arroyo Walk features. Existing Sycamore and Oak trees on Block K would be preserved where possible throughout the park spaces. Residential uses not to exceed 35 feet in height would be required along the northeastern frontage facing 8th Street. Block K may accommodate a high-rise building not to exceed 260 feet in height and a 12,500-square-foot floor plate.

Block L would be a mixed-use block. Pedestrian-only paseos flanked by various frontage types would be encouraged to promote increased pedestrian connectivity. Jacaranda Trees would frame Glenn Avenue between Block L and Block K, creating an inviting pedestrian and vehicular entryway to the site's interior. A community playground open space easement would be provided at the southeast corner adjacent to the school to the south, providing a connection between the school and the central park. Residential uses not to exceed 35 feet in height would be required along the northern frontage facing 8th Street.

Block M would be a mixed-use block with taller buildings concentrated along the central park frontage to the north. Pedestrian-only paseos flanked by various frontage types would be encouraged to promote increased pedestrian connectivity. Block M may accommodate a high-rise building not to exceed 210 feet in height and a 12,500-square-foot floor plate.

(b) Building Design and Architecture

In order to provide a variety of household types and to create a varied and dynamic urban environment, the Design Guidelines and Standards provide for a diversity of building types including row houses, flex/lofts, courtyard buildings, urban blocks, linear buildings with garages, podium buildings, and podium high-rises. Within the Specific Plan, standards

for each block area mandate a minimum number of building types to be located on each block, as described above. Once a particular building type is selected, development must adhere to the applicable building type criteria and standards, including façade width, lot width, pedestrian access, parking, open space, landscape, frontage types and building massing.

In accordance with the Design Guidelines and Standards, new buildings would typically be aligned with the proposed streets, with varied yards or setbacks depending on ground floor uses. For example, along retail-oriented streets, generous paved setbacks would provide space for strolling, window shopping, and café seating, as appropriate, and street trees would be planted in wells with grates. Along residentially oriented streets, the yards would provide a transition between sidewalks and building entrances and would be landscaped to provide privacy for ground floor occupants (where appropriate) and a clear demarcation between public and private spaces. The dimensions of such yards/setbacks will in accordance with the Specific Plan.

In general, project uses within the proposed buildings would be integrated with parking. Project buildings would typically include one or more levels of subterranean, semi-subterranean, and/or aboveground parking. These parking areas may be used to form a podium that may include plaza level with landscaped courtyards or terraces, building entryways, and other amenities. The ground level and façades of such buildings may include office lobbies, retail storefronts, or other uses integrated with the podium structure in order to mask parking uses within the building interior.

The architecture of the new structures would vary, potentially featuring styles ranging from Spanish colonial to contemporary designs relevant to a Southern California aesthetic. For each block frontage, allowable frontage types are specified in the Specific Plan, including shopfront, dooryard, stoop, forecourt, and fence and hedge, given the required building types and land use characteristics of the block area. The project would also integrate a mix of high-quality building materials, as well as pedestrian-oriented features, such as awnings, street lamps, and landscape elements. Additionally, all major utilities would be placed underground. All building types would be designed to encourage activation of the public realm and provide private open spaces, such as gardens, courtyards, and porches for residents.

(c) Circulation and Parking Design

The project would include a new street grid to improve accessibility to and through the site, as shown in Figure II-14 in Section II, Project Description. This new roadway system would link the various areas of the site, improve connectivity to the surrounding neighborhood and the regional roadway network, and provide improved access for public

safety vehicles. The internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation. Landscaped pathways would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment.

As discussed above, the majority of project parking would be provided in a series of subterranean, semi-subterranean, and/or aboveground parking structures integrated within the building designs. Where aboveground parking is provided, the structure would be "wrapped," or screened by building edges that contain occupiable space, such as office lobbies, retail storefronts, and other uses, and/or design elements such as landscaping, green screens, or cladding, such that the new parking areas would not generally be visible from the main street rights-of-way. In some locations, subterranean parking may be provided on a block basis, providing shared parking for buildings located on each block. Additionally, a stand-alone parking structure with up to eight levels (two subterranean and up to six above grade levels) would be developed in the southeast portion of the site to serve the proposed retail uses. Most of the parking structure driveways and loading areas would be located along alleys on the side or rear of the buildings to minimize visual and physical disruptions to the pedestrian environment. In general, open parking structure façades needed for ventilation would also be located along alleys. By concentrating the proposed parking supply in "hidden" structured parking, the project would result in the removal of approximately 8.2 acres of existing surface parking and improve the built environment. Additional street parking would also be provided along segments of the on-site roadways.

(d) Landscaping and Open Space

The project would include a substantial amount of landscaped open space and recreational areas. Specifically, the project would include a civic plaza, an expansive central park, active parks with recreational facilities, neighborhood greens, neighborhood playgrounds, and landscaped courtyards and pathways. The project's open space areas are shown on Figure II-15 in Section II, Project Description. As illustrated, these open space and recreational areas would be spread throughout the site, with the most expansive open space element centrally located and adjoining other nearby open space amenities. The recreational areas would include amenities such as play equipment, athletic courts, seating, and open play areas. A linear stretch of open space named Arroyo Walk would weave through and link the various open space systems, generally following the northern contour of Glenn Avenue. In addition to serving as a major pedestrian corridor and connecting feature throughout the project site, the Arroyo Walk would provide a stormwater management system of bioswales, biofiltration, and infiltration, native planting, heritage oaks, and walking/jogging trails. Collectively, these open space areas would provide approximately 10.5 acres of publicly available, privately maintained, useable open space. In addition, approximately 13.5 acres of semi-private and private recreational amenities

would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, a total of approximately 24 acres of useable open space would be provided, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. Moreover, the project would provide approximately 10.4 acres of streetscape and approximately 7.8 acres of unfenced yard space. Please refer to Table IV.J-13 in Section IV.J.4, Parks and Recreation, for a breakdown of the project's open spaces. Upon completion of the project, the total amount of open space at the ground level, including publicly accessible open space, unfenced yards, streetscape, interstitial spaces, paseos, and courtyards would be 37.25 acres, compared to 36.43 acres of comparable space that currently exists on the project site.

In accordance with the proposed Design Guidelines and Standards, the project would include a landscaping program that would enhance the open space areas, provide shading at appropriate locations, and complement the building architecture. Key features of the landscaping program would include rows of street trees along all internal roadways, as well as the site perimeter; the retention of most of the existing oak and sycamore trees on-site, as well as many of the jacaranda trees along Glenn Avenue; and the creation of landscaped bioswales traversing the site that would collect and filter rainwater. Additionally, landscaped courtyards or terraces may be provided on the plaza level of project buildings and/or on rooftop decks. The proposed plant palette would include native and drought-tolerant species. Following implementation of the landscaping program, the project would replace all trees removed as part of the project at a minimum 2:1 basis, including removed street trees.

(6) Sustainability Features

As discussed in more detail in Section II, Project Description, of this Draft EIR, the proposed project is based on principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the site's proximity to the downtown Los Angeles employment hub, the accessibility of public transit, and the availability of existing infrastructure to service the proposed uses. In addition, the project would be designed to incorporate LEED[®] features so as to be capable of achieving Silver certification under the U.S. Green Building Council's LEED-ND[®] Rating System. As discussed in detail in Section II, Project Description, of this Draft EIR, sustainability features that would be incorporated into the project would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation measures, among others. Table II-3 in Section II, Project Description, of this Draft EIR provides a comprehensive matrix that lists the project's numerous sustainable design features.

(7) Alcohol Consumption Regulations

The project would allow for the sale or dispensing for consideration of alcoholic beverages for on-site and off-site consumption. Guidelines and limitations have been defined as part of the proposed Specific Plan described above. Approvals pursuant to LAMC Section 12.24 W 1 and 12.24 X 2 are not required for the sale of alcohol specifically authorized in accordance with one of the eight Alcohol Use Approvals authorized by the Specific Plan, because the proposed Specific Plan supersedes those sections. A maximum total of eight Alcohol Use Approvals, of which no more than two would allow service of alcoholic beverages for off-site consumption, would be permitted subject to the restrictions set forth in Section 9 of the proposed Specific Plan. The eight Alcohol Use Approvals are only permitted with reference to uses in Blocks A, B, C, H, and K, provided that off-site consumption Alcohol Use Approvals are permitted only on Blocks C, H, and K. Conditions for on-site alcohol consumption are included as Exhibit 6 in the proposed Specific Plan and conditions for off-site alcohol consumption are attached as Exhibit 7 of the proposed Specific Plan. These restrictions are summarized in Project Design Feature IV.J-3 in Section IV.J.1, Police Protection, of this Draft EIR. In addition, in accordance with Project Design Feature IV.J-4 in Section IV.J.1, Police Protection, of this Draft EIR, the commercial uses would only purchase existing alcohol licenses that are transferred from other commercial uses in the Hollenbeck Community Police Station service area so as not to increase the overall number of alcohol licenses in the project area.

d. Analysis of Project Impacts

(1) Land Use Consistency

As discussed above, development of the project site would occur in accordance with the proposed Specific Plan and Design Guidelines and Standards. In addition, development would be subject to various local and regional land use regulations, plans, and programs. The proposed project's consistency with these applicable regulations, plans, and programs is addressed below.

(a) Local Plans, Policies, and Regulations

(i) General Plan Framework

Table IV.G-1 on page IV.G-35 provides an analysis of the proposed project's consistency with relevant goals, objectives, and policies of the General Plan Framework. As demonstrated therein, the project would be substantially consistent with the General Plan Framework. To summarize, the project would contribute to the overall urban form in a manner that supports the aims of the Framework Element to establish a system of centers of varying character and density. The proposed project is based on principles of

**Table IV.G-1
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework**

Goal/Objective/Policy	Analysis of Project Consistency
Chapter 3—Land Use	
<i>Issue 1—Distribution of Land Use</i>	
<p>Goal 3A: A physically balanced distribution of land uses that contributes toward and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</p>	<p>Consistent. As discussed below, the project is consistent with the relevant objectives and policies that support this goal. In summary, the project would replace an aging residential development with a modernized mixed-use community. In addition the project would provide up to 4,400 new residential dwelling units, 325,000 square feet of non-residential uses, including neighborhood-serving retail and office uses, as well as civic spaces. The project's green spaces and recreational amenities would include approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms.</p> <p>As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. Moreover, the project would provide approximately 10.4 acres of streetscape and approximately 7.8 acres of unfenced yard space. Please refer to Table IV.J-13 in Section IV.J.4, Parks and Recreation, for a breakdown of the project's open spaces.</p> <p>Upon completion of the project, the total amount of open space at the ground level, including publicly accessible open space, unfenced yards, streetscape, interstitial spaces, paseos, and courtyards would be 37.25 acres, compared to 36.43 acres of comparable space that currently exists on the project site.</p> <p>The proposed project is based on principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the site's proximity to the downtown Los Angeles employment hub, the accessibility of public transit, the availability of existing infrastructure to service the proposed uses, and the incorporation of LEED® features that would make the project eligible to achieve LEED®</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
	Silver certification. Overall, the project is intended to provide a walkable, livable community with modern amenities and a high-quality design that promotes both environmental and economic sustainability.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. The mixed-use project would provide 4,400 new residential dwelling units as well as 325,000 square feet of non-residential uses, including neighborhood-serving retail and office uses, as well as civic spaces. The project would also provide 10.5 acres of privately maintained, publicly available, common useable open space and parks. These new uses would serve the needs of the City's existing and future residents, businesses, and visitors.
Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	Consistent. The southwest corner of Olympic Boulevard and Soto Street is designated as a Regional Center on the Long-Range Land Use Diagram and as a Major Opportunity Site in the Community Plan. The proposed project would provide a mix of uses in a mid- to high-rise setting and would re-designate the portion of the project site closest to this intersection as Regional Center, which would complement the high-density, mixed-use, and transit-oriented nature of the adjacent Regional Center. In addition to its neighborhood-serving retail and office uses, the project's residential population would support nearby commercial/retail activity. The project's housing units could also provide housing for workers in the Regional Center. The project's civic uses could also support visitors and tourism.
Policy 3.1.3: Identify areas for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.	Consistent. The project would include a substantial amount of landscaped open space and recreational areas. Specifically, the project would include a civic plaza, an expansive central park, active parks with recreational facilities, neighborhood greens, neighborhood playgrounds, and landscaped courtyards and pathways. These open space and recreational areas would be spread throughout the site, with the most expansive open space element centrally located and adjoining other nearby open space amenities thereby providing a system of interconnected open space sites. The recreational areas would include amenities such as play equipment, athletic courts, seating, and open play

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
	<p>areas. A linear stretch of open space named Arroyo Walk would weave through and link the various open space systems, generally following the northern contour of Glenn Avenue. In addition, serving as a major pedestrian corridor and connecting feature throughout the project site, the Arroyo Walk would provide a natural stormwater management system of bioswales, biofiltration, and infiltration, native planting, heritage oaks, and walking/jogging trails. Collectively, these open space areas would provide approximately 10.5 acres of publicly available, privately maintained, useable open space. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms.</p> <p>As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. Moreover, the project would provide approximately 10.4 acres of streetscape and approximately 7.8 acres of unfenced yard space. Please refer to Table IV.J-13 in Section IV.J.4. Parks and Recreation, for a breakdown of the project's open spaces.</p> <p>Upon completion of the project, the total amount of open space at the ground level, including publicly accessible open space, unfenced yards, streetscape, interstitial spaces, paseos, and courtyards would be 37.25 acres, compared to 36.43 acres of comparable space that currently exists on the project site.</p>
<p>Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.</p>	<p>Consistent. See Policy 3.1.1, above.</p>
<p>Policy 3.1.8: Consider the formulation of plans that facilitate the local community's identification of precise uses, densities, and design characteristics for development and public streetscape for neighborhood areas smaller than the community plans, provided that the Framework Element's differentiation and relationships among land use</p>	<p>Consistent. Development of the proposed project would be implemented under the provisions of the proposed Specific Plan and the Design Guidelines and Standards. The proposed Specific Plan would set strict limits on the overall amount of development and allowable land uses within the Specific Plan area; mandate where principal open spaces and</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
<p>districts are generally maintained, there is no significant change in the population and employment capacity of the neighborhood, and there is no significant reduction in overall housing capacity.</p>	<p>primary streets must be located; provide the standards and details for street dimensions, parking, improvements and landscaping; and set overall height limits and FAR limits for the Specific Plan area. The Design Guidelines and Standards would clearly establish the urban design vision and development standards and guidelines for each block relating to: block layout, building placement and scale, building types, frontage types, building design, parking design, sustainability, landscaping, and service and auxiliary functions. The use of the project would remain predominantly residential, maintaining the differentiation and relationships among land uses in the area.</p> <p>As analyzed in Section IV.I.1, Employment, of this Draft EIR, the project would not exceed SCAG's employment forecasts for the City of Los Angeles Subregion, and would be consistent with adopted economic and employment policies of SCAG's RCPG, the General Plan Framework, and the Community Plan. As analyzed in Section IV.I.3, Population, of this Draft EIR, the Project would not induce substantial population growth, nor would it exceed the population forecast for SCAG's City of Los Angeles Subregion. The project would also accommodate existing tenants who choose to remain on-site. The project would also result in a net increase of 3,213 residential dwelling units on the project site.</p>
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.</p>	<p>Consistent. The project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, which was recently completed, and 2 miles southeast of downtown Los Angeles. In addition, the project site is well-served by public transit routes. As such, the project would place jobs and housing in an area that is easily accessible by public transit and proximate to the downtown Los Angeles employment hub. The project would also provide neighborhood-serving retail and office uses on-site that may accommodate business and service needs of project residents and the adjacent community. The project would also include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. These features of the proposed project would facilitate a reduction of vehicular trips,</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
	vehicle miles traveled, and air pollution.
<p>Policy 3.2.1: Provide a pattern of development consisting of districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.</p>	<p>Consistent. The project would provide a mixed-use community/neighborhood that would integrate housing with commercial and public/civic activities. The development would provide a density of development that would be distinctive and offer variation from other residential development in the project area. The project is designed so as to create a unified development with a cohesive urban design that promotes the identity of the project site by harmonizing structures, access, open spaces, and landscaping, and providing a mix of neighborhood-serving uses. A hierarchy of streets is provided to accommodate through travel, as well as emphasize pedestrian activity where appropriate. As previously noted, the project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension.</p>
<p>Policy 3.2.2: Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.</p>	<p>Consistent. The project would provide a mixed-use development that would integrate housing with commercial/retail and public/civic services. The project would provide a density of development that would be distinctive and offer variation from other residential development in the nearby vicinities. The increase in density that would occur as a result of the project would be appropriately located at a site that is within 1.25 miles of two station stops on the MetroRail Gold Line extension, well-served by public transit and within 2 miles of the downtown Los Angeles employment hub.</p>
<p>Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. The project would include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. Specifically, the internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation. Landscaped pathways would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment.</p>
<p>Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of</p>	<p>Consistent. The project would provide a transitional high density residential development between the low density residential development to the north and east of the project site and the</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
commercial and industrial districts.	Regional Center that is designated at Olympic Boulevard and Soto Street. Allowable land uses in the blocks facing existing off-site residential uses to the north and east would be limited to residential, open space, and civic uses to respect the existing residential character. All development within these blocks would have stepped transitional heights up toward the center of the project site with height limitations not exceeding 35 feet along the project site boundary to protect the scale of the adjacent residential neighborhood. The project's retail and high-rise uses would be oriented around the main park in the central portion of the project site, and along the Evergreen Street frontage off Olympic Boulevard, a retail/industrial corridor, near the southern portion of the project site.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	Consistent. As discussed above under Policy 3.1.1, the project would provide multi-family residential, commercial/retail and office development in a planned community that would contribute the general development pattern identified in the General Plan Framework. Additionally, the project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, a primary transit corridor that was recently completed and well-served by public transit.
3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located: (a) in a network of neighborhood districts, community, regional, and downtown centers; (b) in proximity to rail and bus transit stations and corridors; and (c) along the City's major boulevard, referred to as districts, centers, and mixed-use boulevards in accordance with the Framework Long-Range Land Use Diagram.	Consistent. See Policy 3.1.1, Policy 3.2.4, and Objective 3.2, above.
3.4.3: Establish incentives for the attraction of growth and development in the districts, centers, and mixed-use boulevards targeted for growth that may include: a. Densities greater than surrounding areas, b. Prioritization of capital investment strategies for	Consistent. This policy encourages the City to provide incentives for the type of growth identified in the General Plan Framework Element. As discussed above under Policy 3.2.2, the project actions regarding the adoption of a Specific Plan to allow increased density on the project site would further this policy.

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
<p>infrastructure, services, and amenities to support development,</p> <p>c. Economic incentives (e.g., redevelopment, Enterprise Zones, Neighborhood Recovery, and other),</p> <p>d. Streamlined development review processes,</p> <p>e. “By-right” entitlements for development projects consistent with the community plans and zoning,</p> <p>f. Modified parking requirements in areas in proximity to transit or other standards that reduce the cost of development, and</p> <p>g. Pro-active solicitation of development.</p>	
<p align="center"><i>Issue 2—Uses, Density, Characteristics</i></p>	
<p align="center"><u><i>Multi-Family Residential</i></u></p>	
<p>Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.</p>	<p>Consistent. As discussed below, the project is consistent with the relevant objectives and policies that support this goal. In summary, the project would replace an aging residential development with a modern mixed-use community that would include 4,400 new multi-family residential dwelling units. Overall, the project is intended to provide a walkable, livable, community with modern amenities and a high-quality design that enhances the quality of life for the City's existing and future residents.</p>
<p>Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.</p>	<p>Consistent. As previously noted, the project would replace an aging residential development with a modern mixed-use community that would include 4,400 new multi-family residential dwelling units. Overall, the project is intended to provide a walkable and livable community with modern amenities and a high-quality design that enhances the quality of life for the City's existing and future residents. As analyzed in Sections IV.F, Hydrology and Water Quality; IV.J, Public Services; IV.K, Traffic/Access/Parking; and IV.L, Utilities and Service Systems, of this Draft EIR, the proposed project's impacts on public transportation and utility infrastructure and public service providers would be less than significant after mitigation.</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy			Analysis of Project Consistency						
<p>Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with the first following table (excerpted from Table 3-1 of the General Plan Framework) and a Zoning Ordinance density of 18–29 dwelling units/net acre (based on Table 3-3 of the General Plan Framework), with the density permitted for each parcel to be identified in the community plans:</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Typical Characteristics/Uses</th> <th>Discouraged Uses</th> </tr> </thead> <tbody> <tr> <td>Multi-Family Residential</td> <td> <ul style="list-style-type: none"> • Multi-family dwelling units • Supporting uses (parks, schools, community centers, etc.) • Low Medium I: 10–17 dwelling units/net acre • Low Medium II: 18–29 dwelling units/net acre • Medium: 30–55 dwelling units/net acre • High Medium: 56–109 dwelling units/net acre • High: 110–218 dwelling units/net acre • Densities may be adjusted to achieve neighborhood stability and quality of life (refer to policies for factors to be considered) </td> <td> <p>Per LAMC</p> <p>Units are to be designed to convey a higher level of quality (based on guidelines suggested in Chapter 5: Urban Form and Neighborhood Design).</p> </td> </tr> </tbody> </table>			Category	Typical Characteristics/Uses	Discouraged Uses	Multi-Family Residential	<ul style="list-style-type: none"> • Multi-family dwelling units • Supporting uses (parks, schools, community centers, etc.) • Low Medium I: 10–17 dwelling units/net acre • Low Medium II: 18–29 dwelling units/net acre • Medium: 30–55 dwelling units/net acre • High Medium: 56–109 dwelling units/net acre • High: 110–218 dwelling units/net acre • Densities may be adjusted to achieve neighborhood stability and quality of life (refer to policies for factors to be considered) 	<p>Per LAMC</p> <p>Units are to be designed to convey a higher level of quality (based on guidelines suggested in Chapter 5: Urban Form and Neighborhood Design).</p>	<p>Consistent. The project would provide the typical uses for the multi-family residential category indicated in this policy, including multi-family dwelling units and supporting uses including neighborhood-serving commercial/retail uses, parks and open space, and a civic use. As a whole, the project site’s maximum density would be approximately 64 dwelling units per net acre. In the portion of the project site proposed to be designated for Medium Residential land use (refer to Figure IV.G-3 on page IV.G-17), the maximum density would be approximately 67 dwelling units per acre. As indicated in the table, densities may be adjusted to achieve neighborhood stability and quality of life, as guided by the balance of policies of the General Plan Framework.</p> <p>As discussed in this table, the project is largely consistent with the remaining relevant policies of the General Plan Framework. Furthermore, the project site is considered a suitable and ideal site for increased density because it is within 1.25 miles of two station stops on the MetroRail Gold Line extension and well-served by public transit. Additionally, as analyzed in Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR, the project is consistent with the relevant goals, objectives, and policies in the Urban Form and Neighborhood Design Chapter. Additionally, as analyzed below, the density in the Medium Residential portion of the project site would be consistent with the maximum allowable density for the Medium Residential land use category when considering that the planned provision of 15 percent affordable units would make the project eligible for a density bonus of 27.5 percent, which would increase the allowable density under this land use category to 70 dwelling units per acre.</p>
Category	Typical Characteristics/Uses	Discouraged Uses							
Multi-Family Residential	<ul style="list-style-type: none"> • Multi-family dwelling units • Supporting uses (parks, schools, community centers, etc.) • Low Medium I: 10–17 dwelling units/net acre • Low Medium II: 18–29 dwelling units/net acre • Medium: 30–55 dwelling units/net acre • High Medium: 56–109 dwelling units/net acre • High: 110–218 dwelling units/net acre • Densities may be adjusted to achieve neighborhood stability and quality of life (refer to policies for factors to be considered) 	<p>Per LAMC</p> <p>Units are to be designed to convey a higher level of quality (based on guidelines suggested in Chapter 5: Urban Form and Neighborhood Design).</p>							
<p>Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of the General Plan Framework Element.</p>			<p>Consistent. The project would replace an aging residential development with a modern mixed-use community characterized by high-quality building materials and design elements, a mix of</p>						

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
	neighborhood-serving uses, expansive open spaces, and pedestrian- and bicycle-friendly amenities. As analyzed in Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR, the project is consistent with the relevant goals, objectives, and policies in the Urban Form and Neighborhood Design Chapter.
<i>Historic Districts</i>	
Goal 3 M: A City where historic and architectural districts are valued.	Not Consistent. The project site is a district that has been formally determined eligible for listing in the National Register of Historic Places, and is listed in the California Register of Historical Resources. It also is eligible for designation as a City of Los Angeles Historic Cultural Monument. The proposed project would include the demolition of all existing buildings on the project site including all contributing buildings. The demolition, re-configuration, and re-design of contributing resources proposed by the project would result in significant impacts to the Wyvernwood Historic District such that the District could no longer convey its historic significance.
Objective 3.17: Maintain significant historic and architectural districts while allowing for the development of economically viable uses.	Not Consistent. While the project would allow for the development of economically viable uses, as discussed above under Goal 3M, it would result in the removal of an historic district.
Chapter 6—Open Space and Conservation	
Policy 6.3.2: Seek to ensure that users of the City's open space system are safe and secure.	Consistent. A number of design elements, including adequate lighting, building façade design, street furniture, and landscaping, would be designed to create vibrant, pedestrian-friendly environments and promote pedestrian activity. The project would also increase pedestrian activity on-site through the introduction of clearly defined public open spaces and community-serving retail and restaurant areas. The project's residential, commercial, or public environments would be integrated by the Specific Plan into a cohesive and functional site design that maintains good visual connections. Through these design measures, the proposed project would enhance site security by maximizing the instances where "eyes on the street" may provide natural surveillance of the neighborhood, including open space areas, helping to alleviate safety concerns

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
	and improve the quality of life of residents and visitors.
Policy 6.3.3: Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.	Consistent. See Policy 6.3.2, above.
Objective 6.4: Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.	<p>Consistent. The project features approximately 10.5 acres of publicly available, privately funded and maintained, useable open space. The recreational areas would include amenities such as play equipment, athletic courts, seating, and open play areas. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space.</p> <p>Moreover, the project would provide approximately 10.4 acres of streetscape and approximately 7.8 acres of unfenced yard space. Please refer to Table IV.J-13 in Section IV.J.4., Parks and Recreation, for a breakdown of the project's open spaces. Upon completion of the project, the total amount of open space at the ground level, including publicly accessible open space, unfenced yards, streetscape, interstitial spaces, paseos, and courtyards would be 37.25 acres, compared to 36.43 acres of comparable space that currently exists on the project site.</p> <p>The project's open space areas would link to an enhanced system of pedestrian/bicycle accommodations. As such, the project's open spaces would serve population needs and form a strong organizing feature for the site, contributing to the site's identity and role in the community, and enhancing the quality of life of site and community residents.</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
<p>Policy 6.4.1: Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the City.</p>	<p>Consistent. See Objective 6.4, above.</p>
<p>Policy 6.4.2: Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965 (as amended in 1972).</p>	<p>Consistent. The project site is located in East Los Angeles. As discussed in Section IV.J.4, Parks and Recreation, of this Draft EIR, the project's Community Plan area currently does not meet the Public Recreation Plan (PRP)'s desired short-, intermediate-, or long-range standards for the provision of local parklands. The project's green spaces and recreational amenities would include approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. Thus, the project would provide for a net increase in recreational open space areas available to the public when compared with existing conditions.</p>
<p>Policy 6.4.4: Consider open space as an integral ingredient of neighborhood character, especially in targeted growth areas, in order that open space resources contribute positively to the City's neighborhoods and urban centers as highly desirable places to live.</p>	<p>Consistent. The project's open space area would include a civic plaza, an expansive central park, active parks, neighborhood greens, neighborhood playgrounds and landscaped courtyards and pathways. The green space and recreational amenities would include approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space.</p>
<p>Policy 6.4.5: Provide public open space in a manner that is responsive to the needs and wishes of the</p>	<p>Consistent. The project would provide approximately 10.5 acres of publicly available, privately maintained,</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
<p>residents of the City's neighborhoods through the involvement of local residents in the selection and design of local parks. In addition to publicly owned and operated open space, management mechanisms may take the form of locally run private/non-profit management groups, and should allow for the private acquisition of land with a commitment for maintenance and public access.</p>	<p>useable open space. A public use easement would ensure access for the greater general public from dawn until dusk. The project site plan, Specific Plan, and Design Guidelines and Standards were developed in conjunction with an extensive community-based outreach program. The planning process, which began in 2005, included community meetings with current tenants, local stakeholders, community-based organizations, City planning officials, elected officials, and professional service firms. The Applicant continues to work with the local community with the intent of addressing concerns while taking into account the physical, logistical, and economic needs and constraints of the property and existing tenants.</p>
<p>Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.</p>	<p>Consistent. The project's recreational areas would include amenities such as play equipment, athletic courts, seating, and open play areas. A linear stretch of open space named Arroyo Walk would weave through and link the various open space systems, generally following the northern contour of Glenn Avenue. Collectively, these open space areas would provide approximately 10.5 acres of publicly available, privately maintained, useable open space. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space.</p>
<p>Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.</p> <p>a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.</p>	<p>Consistent. See Policy 6.4.4, above.</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
<p>b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of “unbuildable” areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.</p>	
<p>Policy 6.4.10: Provide for the joint use of open space with existing and future public facilities, where feasible.</p> <p>a. Give priority to the development of sites as open space for public access that are located with or occupied by other public facilities such as schools, child care facilities, and libraries.</p>	<p>Consistent. The project would provide approximately 10.5 acres of publicly available, privately maintained, useable open space. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space. In addition, Block H would be reserved for community building(s), a neighborhood park open space easement fronting 8th Street to the north, and the central park open space easement to the south. This design would provide for the joint use of open space with future public facilities.</p>
<p>Policy 6.4.11: Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.</p>	<p>Consistent. See Policy 6.4.10, above.</p>
<p>Objective 6.5: Provide adequate funding for open space resource management and development.</p>	<p>Consistent. As previously described the project would substantially enhance the project’s open space amenities. Further, the open space would be maintained via Homeowners’ Association (HOA) fees.</p>
<p>Policy 6.5.5: Establish incentives for the provision of publicly accessible open space in conjunction with private development projects.</p>	<p>Consistent. The project would be consistent with the intent of this policy which is to encourage the provision of publicly accessible open space within private development projects. As previously noted, the project would provide approximately 10.5 acres</p>

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
	of publicly available, privately maintained, useable open space.
Chapter 7—Economic Development	
Goal 7B: A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.	Consistent. As discussed below, the project is consistent with the relevant objectives and policies that support this goal as the project would introduce commercial/retail uses that would serve the local community, thereby contributing to the vitality of commercial base in Boyle Heights.
Objective 7.2: 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.	Consistent. The project would provide up to 300,000 square feet of retail and/or commercial office uses in an area that is for the most part surrounded by residential and industrial development, thereby diversifying the land use mix in the project area. The development would be provided per Specific Plan requirements, including design standards to provide environmental quality. Retail uses would serve the needs of local residents, and would contribute to the economic well-being of the City.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	Consistent. The project's retail component would be integrated into the overall project design in a manner that complements the residential development. The retail development would not encroach into any existing residential neighborhoods. The project's retail uses would be strategically located within the southern portion of the site along a new internal roadway that would provide access to the north and south and along Olympic Boulevard, which is currently a retail and light industrial corridor anchored by a designated Major Opportunity Site and Regional Center at the Soto Street intersection. This area within the project site would be re-designated as a Regional Center.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	Consistent. The project would provide up to 300,000 square feet of retail and/or commercial office uses in an area that is within 1.25 miles of two station stops on the MetroRail Gold Line extension. Additionally, eight bus lines operate in the immediate vicinity of the project site.

Table IV.G-1 (Continued)

Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	Consistent. As a mixed-use project, up to 300,000 square feet of retail and/or commercial office uses would complement and provide services for the on-site residential population. The retail development would be integrated into the overall project design in a manner that complements residential development.
Policy 7.2.6: Concentrate office development in regional mixed-use centers, around transit stations, and within community centers.	Consistent. The project would provide up to 300,000 square feet of retail and/or commercial office uses in an area that is within 1.25 miles of two station stops on the MetroRail Gold Line extension. The project site is also adjacent to a designated Regional Center and Major Opportunity Site at the southwest corner of Olympic Boulevard and Soto Street.
Goal 7D: A City able to attract and maintain new land uses and businesses.	Consistent. As discussed below, the project is consistent with the relevant objectives and policies that support this goal. In summary, the project would be consistent with the intent of this goal as it would introduce a new mix of land uses to the project site including up to 300,000 square feet of retail and/or commercial office uses to serve the needs of City residents.
Objective 7.6: Maintain a viable retail base in the City to address changing resident and business shopping needs.	Consistent. The project would include up to 300,000 square feet of retail and/or commercial office uses that would address the needs of new population to the project site, as well as existing nearby populations.
Policy 7.6.1: Encourage the inclusion of community-serving uses (post offices, senior community centers, daycare providers, personal services, etc.) at the community and regional centers, in transit stations, and along the mixed-use corridors.	Consistent. The project would provide up to 25,000 square feet of community-serving civic uses in an area that is within 1.25 miles of two station stops on the MetroRail Gold Line extension. The project site is also adjacent to a designated Regional Center and Major Opportunity Site at the southwest corner of Olympic Boulevard and Soto Street. The land uses permitted in the Specific Plan allow for the development of some community serving uses within the retail/commercial areas of the project site. In addition, this area within the project site would be re-designated as a Regional Center.

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Policy 7.6.3: Facilitate the inclusion of shopping facilities in mixed-use developments that serve the needs of local residents and workers. If necessary, consider utilizing financing techniques such as land write-downs and density bonuses.	Consistent. As a mixed-use project, retail uses would complement and provide services for an on-site population. The retail development would be integrated into the overall project design in a manner that complements residential development.
Goal 7F: A fiscally stable City.	Consistent. As discussed below, the project is consistent with the relevant objectives and policies that support this goal. In summary, the project's retail and commercial office component would generate revenue that would support City services.
Objective 7.8: Maintain and improve municipal service levels throughout the City to support current residents' quality of life and enable Los Angeles to be competitive when attracting desirable new development.	Consistent. The project would provide mixed-use development including revenue generating retail activities that would generate tax revenue for the City, thus supporting the City's ability to provide municipal services.
Policy 7.8.3: Encourage mixed-use development projects, which include revenue generating retail, to offset the fiscal costs associated with residential development.	Consistent. The project would be a mixed-use development comprised of up to 4,400 residential units and up to 300,000 square feet of neighborhood-serving, revenue generating retail and office uses.
Goal 7G: A range of housing opportunities in the City.	Consistent. As discussed below, the project is consistent with the relevant objectives and policies that support this goal. In summary, the project would provide a wide range of housing types and opportunities in an area targeted for mixed-use growth.
Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.	Consistent. As discussed in Section IV.I.2, Housing, of this Draft EIR, the Project would provide a net increase of 3,213 housing units, including ownership and rental units, market rate and affordable housing for families. This proposed housing development would help meet the housing needs of the Boyle Heights Area and the City as a whole. The proposed project would be phased to provide existing residents with the opportunity to relocate to another unit within the site. Future residents would have access to local services and transportation, as described above.
Policy 7.9.1: Promote the provision of affordable housing through means which require minimal subsidy levels and which, therefore, are less detrimental to the City's fiscal structure.	Consistent. The project would provide up to 660 affordable housing units including housing for both very low and low income families.

Table IV.G-1 (Continued)
Consistency of Proposed Project with Applicable Goals, Objectives, and Policies of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
<p>Policy 7.9.2: Concentrate future development along mixed-use, corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.</p>	<p>Consistent. As discussed in Section IV.I.2, Housing, of this Draft EIR, the Project would develop 3,213 net new units in close proximity to the Metro Gold Line as well as Olympic Boulevard and Soto Street, two major transit corridors. The project site is also adjacent to a designated Regional Center and Major Opportunity Site at the southwest corner of Olympic Boulevard and Soto Street.</p>
<p>Source: Matrix Environmental, 2011.</p>	

smart growth and environmental sustainability, as evidenced in its mixed-use nature, the site's proximity to the downtown Los Angeles employment hub, the accessibility of public transit, the availability of existing infrastructure to service the proposed uses, and the incorporation of LEED® features that would make the project eligible to achieve LEED® Silver certification. The project would provide needed housing with a variety of unit sizes, rental/ownership options, and price ranges including affordable units. The project's new residential dwelling units, neighborhood-serving retail and office uses, civic spaces, and open space and parks would serve the needs of the City's existing and future residents, businesses, and visitors. Since the proposed project would be substantially consistent with the applicable goals, objectives, and policies of the General Plan Framework, land use impacts relative to this plan would be less than significant.

(ii) Boyle Heights Community Plan

As discussed previously, the Boyle Heights Community Plan designates the project site as Low Medium II Residential. The proposed Project's consistency with the relevant land use goals, objectives, and policies set forth in the Community Plan is analyzed in Table IV.G-2 on page IV.G-52.

As indicated therein, the project would be substantially consistent with goals, objectives, and policies in the Community Plan. Consistent with the Community Plan, the project would increase the availability of housing stock with a variety of housing options including affordable housing, and would provide new commercial services and recreational amenities for residents in the area. The retail/commercial uses would be concentrated within areas of the site that are easily accessed by major east-west thoroughfares such as Olympic Boulevard. The project location would provide convenient access to public transit

**Table IV.G-2
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan**

Policy/Objective	Analysis of Project Consistency
Residential	
<p>Objective 1: To conserve and improve existing viable housing for persons desiring to live in Boyle Heights, especially low and moderate income families.</p>	<p>Consistent. The project would provide up to 4,400 new residential units offering a mix of unit sizes, rental/ownership opportunities, and style/density configurations. The housing mix would also include up to 660 affordable housing units including housing for both very low and low income families. The variations in units would result in a range of housing costs. The proposed project would be phased to provide existing residents the opportunity to relocate to another unit within the site.</p>
<p>Objective 2: To provide new housing opportunities that accommodate a range of income needs, provide public amenities, and maximize the opportunities for individual choice.</p>	<p>Consistent. As noted above under Objective 1, the project would provide a variation of housing types at a range of costs, including market rate, up to 660 affordable housing units for both very low and low income families. The project would provide a number of public and private amenities including up to 300,000 square feet of neighborhood-serving retail and office uses; up to 25,000 square feet of civic uses; approximately 10.5 acres of publicly available, privately maintained, useable open space; and approximately 13.5 acres of semi-private and private recreational amenities for project residents, including such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space.</p>
<p>Objective 3: To improve the relationship between residential uses, the circulation system and the service system facilities (streets, highway, schools, parks, fire, police, utilities)</p>	<p>Consistent. The project would implement a new higher density, clustered development project in an area served by main line infrastructure. The project site would include construction of on-site infrastructure to meet project needs and enhance the utility circulation system to better serve the infrastructure needs in the project vicinity. A new hierarchy of streets will be included to help connect with the existing surrounding street grid.</p>
<p>Policy 3: It is the City's policy that the existing Low-Medium II density housing be preserved where such housing is in relatively good condition or can be made so with moderate improvements.</p>	<p>Consistent. The Project would remove existing Low-Medium II density housing from the project site. However, the existing on-site housing is aged and displays a number of deficiencies including spatial limitations, insufficient parking, and utility infrastructure that is in poor condition, including inadequate drainage. Significant and costly improvements would be required to correct these and other problems. The increase in density supports City policies for the increase in housing opportunities, mixed-use development, and densification at key locations. In addition, to avoid adverse effects to adjacent</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan

Policy/Objective	Analysis of Project Consistency
	Low-Medium II density housing, allowable land uses in the blocks facing off-site residential uses to the north and east would be limited to residential, open space, and civic uses. All development within these blocks would have stepped transitional heights up toward the center of the project site such that buildings would not exceed a height of 35 feet along the project site boundary abutting residential uses.
Policy 5: It is the City's policy that that High-Medium density housing be provided only within a 0.25-mile radius from proposed Metrorail Station stops.	Not Consistent. The project's maximum density would be approximately 64 dwelling units per net acre, which falls in the High-Medium density range. The nearest MetroRail Gold Line station is approximately 1.25 miles from the project site. It should be noted that while this distance may be greater than the preferred distance stated in the policy, the project site is nonetheless well situated in regard to transit access as there are at least eight bus lines in the project's vicinity. Further, the project site is located adjacent to a designated Regional Center and Major Opportunity Site (also more than 0.25 mile from the nearest Gold Line station).
Policy 6: It is the City's policy that funds for the rehabilitation of the existing housing stock continue to be provided in order to conserve and upgrade the availability of a viable and affordable housing supply.	Consistent. The project would replace existing, aged housing with upgraded housing inclusive of up to 660 affordable units for very low and low income families.
Commercial	
Objective 1: To conserve and strengthen viable commercial development in the Community and to provide additional opportunities for new commercial development and services.	Consistent. The project would include up to 300,000 square feet of new retail and commercial-office uses to meet the needs of the community.
Objective 2: To provide a range of commercial facilities at various locations to accommodate the shopping needs of residents, including persons of restricted mobility, and to provide increased employment opportunities within the Community.	Consistent. The project would include up to 300,000 square feet of new retail and commercial-office uses that would be ADA compliant and would meet the needs of the community within the context of a pedestrian-oriented community. The commercial/retail space will also create employment opportunities within the community. The project's retail and uses would be oriented around high activity areas within the project site, including the main park in the central portion of the project site, and along the Evergreen Street frontage off Olympic Boulevard, a retail/industrial corridor, near the southern portion of the project site.

Table IV.G-2 (Continued)
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan

Policy/Objective	Analysis of Project Consistency
<p>Objective 4: To improve the compatibility between commercial and residential uses.</p>	<p>Consistent. The project would develop a mixed-use project that is internally compatible and integrated through the Specific Plan and Design Guidelines and Standards. The retail and high-rise uses would be oriented around the project's high activity areas, including the main park in the central portion of the project site, and along the Evergreen Street frontage off Olympic Boulevard, a retail/industrial corridor, near the southern portion of the project site. The retail and commercial uses would be strategically located around the project's pedestrian pathways including the main pedestrian thoroughfare, Arroyo Walk. This would facilitate public access to the project's community serving uses and enhance economic activity on the project site. The project's residential uses would be concentrated along the lower density perimeters of the project site and buffered from other uses by the various parks and open space areas that would be distributed throughout the site. The project's design would also ensure compatibility with lower density, off-site residential uses surrounding the site. Specifically, allowable land uses in the blocks facing off-site residential uses to the north and east would be limited to residential, open space, and civic uses. All development within these blocks would have stepped transitional heights up toward the center of the project site while buildings would not exceed a height of 35 feet along the project site boundary.</p>
<p>Objective 5: To improve the compatibility between existing commercial uses to develop complementary land-use patterns that enhance economic activity.</p>	<p>Consistent. See Objective 4, above. In addition, as discussed below under the Urban Decay heading, the Urban Decay Analysis concluded that the amount of retail floor area in the proposed project can be supported entirely by growth in demand from net new project households. Thus, the project's retail would not drain sales away from existing retailers or other planned retail developments.</p>
<p>Policy 1: That commercial facilities be located primarily on east-west traffic arteries to reinforce existing development and to minimize negative impact on residential neighborhoods.</p>	<p>Consistent. As discussed above under Objective 4, the project's commercial activity would be anchored along the east-west oriented Olympic Boulevard and would not encroach into residential areas adjacent to the north and east of the project site. To the extent that commercial activity is located within the project site, such development would be consistent with the overall mixed-use concept for the project site and compatible with new residential uses within the project site.</p>
<p>Policy 5: That neighborhood markets and retail and service establishments oriented to the residents be retained throughout the Community, within walking distance of residents.</p>	<p>Consistent. The proposed retail and commercial services would be provided on-site within a pedestrian-oriented, walkable community. These uses would be located within walking distance of on-site residences as well as residential neighborhoods to the north and east of the project site. The proposed project would improve the existing pedestrian</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan

Policy/Objective	Analysis of Project Consistency
	<p>environment by introducing high quality, pedestrian-scaled buildings, varied architecture, and a mix of uses with street frontage improvements, thereby creating an enhanced pedestrian environment and inviting pedestrian activity into the project site. The project would integrate a mix of high-quality building materials, as well as pedestrian-oriented features such as awnings, street lamps, and landscape elements. Landscaped pathways and bicycle routes would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The new streets and pedestrian pathways would provide multiple routes through and around the property, while offering clear public access and visibility to new neighborhood park spaces. A series of parks and tree-lined streets would also create physical and visual continuity throughout the site and an inviting pedestrian atmosphere.</p>
<p>Policy 8: That new commercial development be oriented so as to facilitate pedestrian access by locating parking to the rear of structures and provide entrances oriented toward the east/west commercial streets to preserve the continuity of the streetscape and enhance the pedestrian environment.</p>	<p>Consistent. See Policy 1 and Policy 5, above. Additionally, in accordance with the Design Guidelines and Standards, commercial/retail uses and community facility entrances would be marked by well-lit ground floor building frontages that are directly accessible from the sidewalk, primarily along the perimeter of the centrally located main park and the Evergreen Street retail hub, with direct access to the east-west oriented Olympic Boulevard. The majority of project parking would be provided in a series of subterranean, semi-subterranean, and/or aboveground parking structures integrated within the building designs. Where aboveground parking is provided, the structure would be “wrapped,” or screened by building edges that contain occupiable space such as office lobbies, retail storefronts, and other uses, and/or design elements such as landscaping, green screens, or cladding, such that the new parking areas would not generally be visible from the main street rights-of-way.</p>
<p>Recreation and Parks Facilities</p>	
<p>Objective 1: To provide adequate recreation and park facilities which meet the needs of the residents in the community.</p>	<p>Consistent. The project would include approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks. The recreational areas would include amenities such as play equipment, athletic courts, seating, and open play areas. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan

Policy/Objective	Analysis of Project Consistency
	and recreational facilities, and 2.5 acres of private open space.
Circulation	
<p>Objective 1: To provide for a circulation system coordinated with land uses and densities in order to accommodate the movement of people and goods.</p>	<p>Consistent. The project would include a new street grid to improve accessibility to and through the site. This new roadway system would link the various areas of the site, improve connectivity to the surrounding neighborhood and the regional roadway network, and provide improved access for public safety vehicles.</p>
<p>Objective 3: To minimize the conflict between vehicular and pedestrian traffic.</p>	<p>Consistent. The project would promote pedestrian and vehicular separation and safety by clearly demarcating pedestrian areas and providing a number of design measures to facilitate pedestrian crossings at roadways. Vehicular roadways would be aligned with pedestrian sidewalks improved with new landscaping and pedestrian amenities. Landscaping and street furniture would provide buffers between pedestrian and vehicular thoroughfares. New crosswalks would meet Department of Transportation and Department of Public Works requirements and would incorporate appropriate features to ensure visibility. In accordance with the Design Guidelines and Standards, bulb-outs at intersections (and occasionally mid-block) would be provided to facilitate safe pedestrian crossing without hindering the flow of traffic. Pedestrians at crossings would have adequate views of the roadway and approaching vehicles.</p>
<p>Policy 1: That no residential, commercial or industrial zone changes be approved unless it is determined that transportation facilities, existing or assured, are adequate to accommodate the traffic generated.</p>	<p>Not Consistent. Approval of the proposed project is subject to review pursuant to CEQA as well as the approval of a detailed traffic study by the Los Angeles Department of Transportation. As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, the project's traffic study concluded that with implementation of the project's proposed mitigation program, significant impacts would occur at six study intersections during one or more peak hours. Partial mitigation was identified at five of these six intersections, with the exception of Downey Road & Leonis Boulevard, where no feasible mitigation measures were identified. However, that intersection, located in the City of Vernon, would not be significantly impacted using City of Vernon criteria. Also, if the lead agency decides to retain on-street parking in-lieu of the proposed mitigation measures at the following intersection, impacts would remain at the intersection of Soto Street & 8th Street. Additionally, a significant neighborhood intrusion impact may occur if no consensus is reached amongst the neighbors and/or LADOT regarding the neighborhood intrusion mitigation program recommended as mitigation.</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan

Policy/Objective	Analysis of Project Consistency
	<p>It should be noted that the project's significant traffic impacts would be mitigated to the extent feasible through implementation of a project-level transportation demand management (TDM) program that includes a series of TDM elements including improved bus shelters, additional bus stops, shared parking, and implementation of additional TDM strategies. The project would also provide neighborhood-serving retail and office uses on-site to help accommodate the needs of project residents and the adjacent community, and would include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. Furthermore, the project would provide infill development that and would place residential uses in proximity to job-rich areas and public transit. As such, the project would promote balanced growth in support local and state fiscal policies aimed at promoting smart growth and discouraging urban sprawl. The project site is specifically located within 1.25 miles of two station stops on the MetroRail Gold Line extension, which was recently completed, and 2 miles southeast of downtown Los Angeles. Thus, while the project would result in significant impacts at local intersections, it would promote a sustainable regional transportation system by facilitating a reduction of vehicular trips and vehicle miles traveled.</p>
<p>Policy 3: That the unique character of Community streets should be maintained and enhanced by improved design characteristics such as street trees, landscaped median strips, traffic islands and special paving.</p>	<p>Consistent. The proposed project includes Design Guidelines and Standards that would provide for a hierarchy of streetscape including trees, shrubs/accents, ground covers, and vines. Street furniture would also be provided to encourage pedestrian activity and could include benches, dining chairs and tables, bicycle racks, drinking fountains, trash and recycling receptacles, newspaper boxes, tree grates, decorative pottery, and bollards that would provide buffers between pedestrian and vehicular thoroughfares and create a distinct and unique community character. Mid-block pedestrian paseos would be attractively designed through the use of special paving and landscaping, and would be no less than 15 feet wide, creating visually interesting and unique spaces.</p>
<p>Policy 4: That a bikeway system should be developed within the Community to permit safe bicycle use and to link residents to other bikeway systems which provide access to recreational facilities.</p>	<p>Consistent. Landscaped pathways and bicycle routes would be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The project's internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation.</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Objectives and Policies of the
Boyle Heights Community Plan

Policy/Objective	Analysis of Project Consistency
Public Transportation	
<p>Objective 1: To maximize the effectiveness of public transportation to meet the travel needs of transit-dependent residents.</p>	<p>Consistent. The project's significant traffic impacts would be mitigated to the extent feasible through implementation of a project-level transportation demand management (TDM) program that includes a series of TDM elements including improved bus shelters, additional bus stops, shared parking, and implementation of additional TDM strategies.</p>
<p>Objective 2: To encourage alternate modes of travel and provide an integrated transportation system that is coordinated with land uses and which can accommodate the total travel needs of the Community.</p>	<p>Consistent. The project would promote various forms of alternate modes of travel. The proposed project would improve the existing pedestrian environment by introducing high-quality, pedestrian-scaled buildings, varied architecture, and a mix of uses with street frontage improvements, thereby creating an enhanced pedestrian environment and inviting pedestrian activity into the project site. The project would integrate a mix of high-quality building materials, as well as pedestrian-oriented features such as awnings, street lamps, and landscape elements. Landscaped pathways and bicycle routes would be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The project's internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation. Additionally, the project would be located within 1.25 miles of two station stops on the MetroRail Gold Line extension, and eight bus lines operate in the immediate vicinity of the project site. As such, the project location would provide convenient access to public transit.</p>
<p>Source: Matrix Environmental, 2011.</p>	

and would incorporate numerous pedestrian and bicycle friendly amenities to encourage alternative forms of transportation. The project would develop a mixed-use project that is internally compatible and integrated through the Specific Plan and Design Guidelines and Standards. The project's design would also ensure compatibility with lower density, off-site residential uses surrounding the site.

New development for the proposed project would be governed by regulatory controls intended to assure appropriate capacity of public facilities, provide an ordered and cohesive design for the project site, and provide for development that conforms with the goals and objectives of local and regional plans and policies. Thus, implementation of the

proposed project would require General Plan amendments to: revise the project site's land use designation from Low Medium II Residential to Medium Residential and Regional Center; amend the Boyle Heights Community Plan by adding a General Plan policy specific to the project site that would require future approval of a Specific Plan before development could occur and then provide flexibility in the types of uses permitted under the General Plan; and amend the Regional Center and Medium Residential land use designations in the Boyle Heights Community Plan to reflect that the Boyle Heights Mixed Use Specific Plan Zone (BHMUSP) is a consistent and permitted zone under the Regional Center and Medium Residential land use designations.

With the requested General Plan amendments, Blocks C, D, E, F, G, H, I, J, K, and L, which would be primarily residential in character, would be designated as Medium Residential. In the Boyle Heights Community Plan, the Medium Residential land use designation corresponds to the R3 Multiple Dwelling Zone in the LAMC. The Boyle Heights Community Plan indicates that the Medium Residential land use category has an allowable density of up to 55 dwelling units per net acre. As a Project Design Feature to be memorialized in a statutory Development Agreement and as analyzed in this Draft EIR, the Applicant has set forth that 15 percent of the project's dwelling units would be made available as affordable housing units for low income families. By setting aside 15 percent of the units for affordable housing, the project would be entitled to a density bonus of 27.5 percent under State law and City of Los Angeles ordinances. Accordingly, the maximum permitted density in the portion of the project designated Medium Residential would be 70 dwelling units per net acre when accounting for the 15 percent affordable housing provision that is part of the project. The project would include approximately 2,940 dwelling units within this 43.9-acre area, which results in a density of 67 dwelling units per net acre.⁹ Thus, the proposed density of the Medium Residential portion of the project site would be consistent with the proposed General Plan designation.

With the requested General Plan amendments, Blocks A, B, and M, which would contain a mix of residential, retail, and office land uses, would be designated as Regional Center. As discussed in the policy analysis contained in Table IV.G-1 on page IV.G-35, this designation is consistent with the goals and policies of the Framework Element and is consistent with the land use designation of the Sears property to the southwest of the project site. In the Boyle Heights Community Plan, the Regional Center land use designation corresponds to (among other zones) the C2 Commercial Zone in the LAMC.

⁹ *Future streets were not considered in arriving at the permitted density consistent with the method provided in LAMC Sec. 12.22(A)(25)(f)(7). ("The area of any land required to be dedicated for street or alley purposes may be included as lot area for purposes of calculating the maximum density permitted by the underlying zone in which the project is located.")*

By reference, the C2 Zone incorporates any use permitted in the C1.5 Limited Commercial Zone, the C1 Limited Commercial Zone, and the R4 Multiple Dwelling Zone. Under the LAMC, the minimum lot area per dwelling unit in the R4 Zone is 400 square feet, which yields a permitted density of 109 dwelling units per net acre (i.e., 43,560 sf/acre ÷ 400 sf). The portion of the project site to be designated Regional Center would provide a maximum of 1,460 dwelling units over 17.1 acres. This yields a density 85 dwelling units per net acre, which is well below the permitted density in the R4 Zone, even without accounting for the additional density associated with the 15 percent affordable housing provision that is part of the project. Thus, the proposed density of the Regional Center portion of the project site would be consistent with the proposed General Plan designation.

The project would not be consistent with the existing general plan designation for the project site. However, based on the above, the project would expressly limit the overall amount of permitted development to a level below what is permitted under the corresponding proposed Community Plan land use designations. Additionally, as discussed in the policy analysis in Table IV.G-2 on page IV.G-52, the types of land uses allowed in the Medium Residential and Regional Center designations are consistent with the character of the project site and the surrounding area. Thus, with approval of the requested General Plan amendments and adoption of the Specific Plan, the proposed project would be substantially consistent with the general intent of the Community Plan and potential impacts associated with consistency with the General Plan would be reduced to a less than significant level.

(iii) Los Angeles Municipal Code (LAMC)

As shown in Figure IV.G-2 on page IV.G-12, the project site is zoned Restricted Density Multiple Dwelling Zone and Height District 1 (RD 1.5-1). Under the proposed project, the site would be re-zoned to reflect the proposed Boyle Heights Mixed-Use Specific Plan. The regulations of the proposed Specific Plan are in addition to those set forth in the Planning and Zoning Code (Chapter 1) of the LAMC. Whenever the Specific Plan contains provisions which establish regulations (including, but not limited to, standards such as densities, calculation of buildable area and floor area, heights, land uses, parking, open space, and landscape requirements), which are different from, more restrictive, or more permissive than would be allowed pursuant to the LAMC, the Specific Plan would supersede the applicable provisions of the LAMC and those relevant ordinances. The Design Guidelines and Standards are also part of the proposed Specific Plan and are attached as Appendix A to the Specific Plan. The Design Guidelines also supplement LAMC provisions and, where there is a conflict, supersedes them.

Under the Specific Plan, allowable residential uses on the project site would include any uses allowed within the R3 Zone. The R3 Multiple Dwelling Zone allows for most of

the uses allowed in the project site's current RD 1.5 Zone, but does not include the following uses: parks, playgrounds, community centers, and the keeping of equines, in conjunction with the residential use of the lot. The total floor area permitted on the project site would be limited to three times the area of the buildable area of a lot (prior to dedications) (i.e., a FAR of 3:1). The maximum FAR for a Block Area permitted on the project site would be 6:1.

Building heights would be consistent with Height District 1, except for locations along the northern and northeastern edges of the site, which would be consistent with the more restrictive heights of the 1L and 1VL districts. A transitional height zone extending a distance of 70 feet into the site interior would limit building heights to 35 feet along the north and northeastern site perimeters of the project site, closest to adjacent low density residential uses. The allowable height would step up to 64 feet moving toward the center of the site, transitioning to a 74-foot height limitation along the edges of the central park and along the Evergreen Street retail frontage. This would, at some locations where a high-rise building is permitted, exceed current allowable building heights on the project site which are 45 feet (within the RD 1.5 zone, Height District 1 restricts building heights of up to 45 feet). Nonetheless, the creation of these transitional height zones would maintain low- and mid-rise buildings in the northern and northeastern areas of the site and concentrate the tallest structures furthest from nearby low-rise residences, resulting in a project design that promotes visual compatibility with off-site uses (see also the analysis of Land Use Compatibility, below).

As a mixed-use development, the Specific Plan also permits office, retail, civic and open space uses. Areas of the Specific Plan designated for office/commercial uses are any uses permitted in the City's C2 Zone, except for the following: carpenter, plumbing or sheet metal shop, except on a temporary basis during construction; tire shop; shooting gallery or skating rink; automotive fueling and service station; used automobile and trailer sales area; new automobile sales area and a secondary used automobile sales area; baseball or football stadiums or boxing arenas, having a seating capacity for not more than three thousand (3,000) people; automotive laundry or wash rack; circus or carnival uses or amusement enterprises of a similar type, transient in character; provided that special events and temporary uses including parades, street fairs and festivals, outdoor performances, TV/Movie Stages and sets and other similar uses are permitted; drive-in businesses, including theaters, refreshment stands, restaurants, food stores, banks, pharmacies, and the like; ferris wheels, carrousel, merry-go-rounds, and the like; film exchange; hospitals, sanitariums or clinics, and animal hospital; ice storage houses; pony riding ring, without stables; automotive repair; pawnshops; massage parlor, not including day spas; school (elementary or high), educational institution, or private school; indoor swap meets; miniature or pitch and put golf courses, golf driving tees or ranges, and similar commercial golf uses; shelter for the homeless; air conditioning equipment service; baths,

Turkish and the like; telephone exchange; golf course or club; and laundromat or other automated laundry facility, not including laundry service offered as part of a dry cleaning or similar establishment.

For areas of the Specific Plan designated for retail uses, the Specific Plan permits any use that is otherwise permitted in accordance with the office uses described above, provided that the use is in the nature of a retail store, shop, or business or other retail type establishment, including but not limited to a restaurant, café, market or delicatessen, similar type establishment. In addition, outdoor eating areas are permitted on all floors of buildings, private setback areas and on public sidewalk areas, in compliance with all other applicable local, state and federal code requirements. Also, outdoor vendor carts are permitted in public plazas and hardscaped open space areas within the Specific Plan area. Areas in the Specific Plan designated as Mixed-Use/Flex could have any use permitted in the Office or Retail designations.

The civic uses permitted within the Specific Plan are: clubs or lodges; day care centers; after-school facilities; exhibitions and art galleries; library buildings; meeting halls or clubhouses; function areas; community rooms; museum, exhibition, or similar public oriented facilities. The areas designated for open space in the Specific Plan could include any park or open space use developed in accordance with the Design Guidelines and Standards in the Specific Plan. The open space areas required to be publicly accessible open space need not be dedicated to the City, but would be provided in the form of open space easements.

In summary, the proposed Specific Plan zoning designation would set forth regulatory controls for the orderly development of the project site that are comparable to existing zoning requirements but also take into account the mixed-use nature of the project site. Approval of the proposed Specific Plan would more closely align the project site with the type and density of development envisioned by the General Plan Framework and Community Plan at the adjacent intersection of Soto Street and Olympic Boulevard. Approval of the Specific Plan would also take better advantage of the project site's proximity to the recently completed MetroRail Gold Line extension, which is within a 1.25-mile radius, and fulfill established City planning directives to develop higher density uses near public transit and locate jobs near housing to reduce commute times and related environmental impacts. Please refer to Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR, for a discussion of Project consistency with LAMC building height limits, setbacks, signage, and other related development standards. In addition, please refer to Section IV.J.1, Police Protection, of this Draft EIR, for a discussion of potential impacts related to alcohol consumption.

With implementation of the requested approvals, including adoption of the proposed Boyle Heights Community Project Specific Plan and zone change, land use impacts related to LAMC consistency would be less than significant.

(iv) City of Los Angeles State Enterprise Zone

The project site is located within the East Los Angeles EZ, and thus the proposed project would be eligible for many of the incentives offered by the City. As stated above, the goal of the incentives is to stimulate increased employment opportunities, business attraction, and investment in economically disadvantaged areas. The project's new housing, retail/commercial, office, and civic uses, supported by green/open space and amenities, would meet on-site and community needs and stimulate business activity, thus enhancing the economic viability of the project site and the surrounding area. Thus, the proposed project would be consistent with the City's intent for the East Los Angeles EZ.

(v) City of Los Angeles Walkability Checklist

Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR provides an analysis of the proposed project's consistency with the City's Walkability Checklist. As demonstrated therein, the project would comply with the implementation strategies of the City's Walkability Checklist. The project would incorporate elements and design features that would improve the pedestrian environment and promote walkability. As such, the proposed project would be consistent with the City's Walkability Checklist.

(b) Regional Plans and Applicable Policies

(i) SCAG Regional Transportation Plan and Growth Vision Report

The six main goals of SCAG's 2008 RTP aim to maximize mobility and accessibility for all people and goods in the region; ensure travel safety and reliability for all people and goods in the region; preserve and ensure a sustainable regional transportation system; maximize the productivity of our transportation system; protect the environment, improve air quality and promote energy efficiency; encourage land use and growth patterns that complement our transportation investments and improves the cost-effectiveness of expenditures; and maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.¹⁰

¹⁰ *The RTP has been amended three times since its adoption. The changes included in the amendments are minor in nature and includes modifications or additions of additional projects, changes to completion (Footnote continued on next page)*

Table IV.G-3 on page IV.G-65 provides an analysis of the proposed project's consistency with the applicable goals and policies in SCAG's 2008 RTP. The four principles within SCAG's Growth Vision Report are intended to promote and maximize regional mobility, livability, prosperity and sustainability. Decisions regarding growth, transportation, land use and economic development should support and be guided by these principles. As demonstrated within Table IV.G-3, the project would be consistent with the Growth Vision Report. As discussed above, the project site is located within a Compass Blueprint 2% Strategy Opportunity Area, targeted to serve the mobility, livability, prosperity and sustainability goals of the Growth Vision. As the proposed project would focus development within the 2% Strategy Opportunity Area, and based on the project Design Features and benefits cited above, the proposed Project would be consistent with SCAG's Compass Blueprint 2% Strategy.

(ii) Los Angeles County Congestion Management Program

Section IV.K, Traffic, Access, and Parking, of this Draft EIR provides an analysis of the proposed project's consistency with the County CMP. As demonstrated therein, the project would not result in significant impacts to the CMP intersection and freeway monitoring locations located in the vicinity of the project site. Moreover, the project would not result in significant impacts to public transportation in the area. Therefore, the project would be consistent with the CMP.

(iii) SCAQMD Air Quality Management Plan

Section IV.B.1, Air Quality, of this Draft EIR provides an analysis of the proposed project's consistency with the AQMP. As demonstrated therein, while development of the proposed project would result in short-term regional impacts, project development would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of particulate matter less than 10 microns (PM₁₀) and nitrogen oxide (NO_x). Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. The project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

years for certain projects and minor modifications to project scope, costs and funding. These amendments do not affect the project's consistency with the RTP.

**Table IV.G-3
Project Consistency with SCAG RTP and Compass Growth Vision**

No.	Goal/Policy	Analysis of Project Consistency
Regional Transportation Plan (RTP) Goals		
RTP G1	Maximize mobility and accessibility for all people and goods in the region.	Consistent. The project would develop a mixed-use high density community within an area that is easily accessible by public transit. Specifically, the project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, and within the immediate vicinity of eight bus lines. The project would provide bus stop amenities along the site perimeter, and fund the operation of additional buses as part of the transit mitigation program, (see Section IV.K, Traffic, Access, and Parking) thus improving access to public transportation services in the area. The project would also include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. Specifically, the internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation. Landscaped pathways would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The project is also centrally located 2 miles southeast of downtown Los Angeles and adjacent to several freeways, including the Golden State/Santa Ana Freeway (I-5), the Santa Monica Freeway (I-10), the Pomona Freeway (SR-60), and Hollywood Freeway (US 101), allowing immediate access to the regional freeway system.
RTP G2	Ensure travel safety and reliability for all people and goods in the region.	Consistent. The project would include a new street grid to improve accessibility to and through the site. This new roadway system would link the various areas of the site, improve connectivity to the surrounding neighborhood and the regional roadway network, and provide improved access for public safety vehicles. All of the roadways have been designed to meet current safety standards. Additionally, a project-level TDM program would be implemented that includes a series of TDM elements including improved bus shelters, additional bus stops, shared parking, and implementation of additional TDM strategies.
RTP G3	Preserve and ensure a sustainable regional transportation system.	Consistent. The project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, which is nearing construction completion, and 2 miles southeast of downtown Los Angeles. As such, the project would place jobs and housing in an area that is easily accessible by public transit and proximate to the downtown Los Angeles employment hub. The project

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
		would also provide neighborhood-serving retail and office uses on-site for the use of project residents and the adjacent community, and would include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. In addition, the project would provide a comprehensive TDM program as described above under RTP G2. All of these features of the proposed project would facilitate a reduction of vehicular trips and vehicle miles traveled, thereby promoting a sustainable regional transportation system.
RTP G4	Maximize the productivity of our transportation system.	Consistent. As described in response to RTP G3, above, the project location and characteristics contribute to land use patterns that facilitate a reduction of vehicular trips and vehicle miles traveled, thereby maximizing the productivity of the region's transportation system.
RTP G5	Protect the environment, improve air quality and promote energy efficiency.	Consistent. As described in response to RTP G3, above, the project location and characteristics contribute to land use patterns that facilitate a reduction of vehicular trips, vehicle miles traveled, and air pollution. Further, the project would be designed to incorporate LEED® features so as to be capable of achieving Silver certification under the U.S. Green Building Council's LEED-ND® Rating System. Such LEED® features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation measures, among others (refer to Table II-3 in Section II, Project Description, of this Draft EIR for a detailed list of the project's sustainability features).
RTP G6	Encourage land use and growth patterns that complement our transportation investments.	Consistent. As described in response to RTP G3, above, the project location and characteristics contribute to land use patterns that facilitate a reduction of vehicular trips and vehicle miles traveled, thereby maximizing the productivity of the region's transportation system. Furthermore, the project site is located within a Compass 2% Strategy Opportunity Area, which indicates that it has been identified by SCAG as an opportunity area for the implementation of the Compass Blueprint 2% Strategy to develop compact, mixed-use development with housing and jobs near major transportation infrastructure. The project's mix of uses and proposed density are consistent with the land use and growth patterns envisioned in SCAG's Compass Growth Vision. Additionally, the adjacent southwest corner of Olympic Boulevard and Soto Street is designated as a Regional Center and Major Opportunity Site by the City of Los Angeles.

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
RTP G7	Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Consistent. Although this goal applies to system monitoring and planning activities that would be carried out by SCAG and/or transportation agencies, the project would support this goal by implementing land use development patterns that facilitate a reduction of vehicular trips and vehicle miles traveled, thereby promoting a safe and sustainable regional transportation system. The project would include a new street grid to improve accessibility to and through the site. This new roadway system would link the various areas of the site, improve connectivity to the surrounding neighborhood and the regional roadway network, and provide improved access for public safety vehicles.
<i>Growth Vision Report Principles and Goals</i>		
GVP1	Principle 1: Improve mobility for all residents.	Consistent. The project would develop a mixed-use high density community within an area that is easily accessible by public transit. Specifically, the project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, and within the immediate vicinity of eight bus lines. The project would provide bus stop amenities and new bus stops along the site perimeter, thus improving access to public transportation services in the area. The project would also include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. Specifically, the internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation. Landscaped pathways would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The project is also centrally located 2 miles southeast of downtown Los Angeles and adjacent to several freeways, including the Golden State/Santa Ana Freeway (I-5), the Santa Monica Freeway (I-10), the Pomona Freeway (SR-60), and Hollywood Freeway (US 101), allowing immediate access to the regional freeway system.
GVP1.1	Encourage transportation investments and land use decisions that are mutually supportive.	Consistent. As described in response to RTP G3, above, the project location and characteristics contribute to land use patterns that facilitate a reduction of vehicular trips and vehicle miles traveled, thereby maximizing the productivity of the region's transportation system. Furthermore, the project site is located within a Compass 2% Strategy Opportunity Area, which indicates that it has been identified by SCAG as an opportunity area for the

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
		implementation of the Compass Blueprint 2% Strategy to develop compact, mixed-use development with housing and jobs near major transportation infrastructure. The project's mix of uses and proposed density are consistent with the land use and growth patterns envisioned in SCAG's Compass Growth Vision.
GV P1.2	Locate new housing near existing jobs and new jobs near existing housing.	Consistent. The project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, which was recently completed, and 2 miles southeast of downtown Los Angeles. As such, the project would place jobs and housing in an area that is easily accessible by public transit and proximate to the downtown Los Angeles employment hub. The project would also provide neighborhood-serving retail and office uses on-site providing employment opportunities for project residents and the adjacent community.
GV P1.3	Encourage transit-oriented development.	Consistent. The project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, and within the immediate vicinity of eight bus lines. The project would provide bus stop amenities and new bus stops along the site perimeter, thus improving access to public transportation services in the area.
GV P1.4	Promote a variety of travel choices.	Consistent. The project would develop a mixed-use high density community within an area that is easily accessible by public transit. Specifically, the project site is within 1.25 miles of two station stops on the MetroRail Gold Line extension, and within the immediate vicinity of eight bus lines. The project would provide bus stop amenities and new bus stops along the site perimeter, thus improving access to public transportation services in the area. The project would also include a system of bicycle routes and pedestrian paths throughout the site to encourage alternative modes of transportation. Specifically, the internal street network would be designed to accommodate shared vehicular and bicycle traffic, equivalent to the City of Los Angeles' Class III bike lane designation. Landscaped pathways would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The project is also centrally located 2 miles southeast of downtown Los Angeles and adjacent to several freeways, including the Golden State/Santa Ana Freeway (I-5), the Santa Monica Freeway (I-10), the Pomona Freeway (SR-60), and Hollywood Freeway (US 101), allowing immediate access to the regional freeway system.

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
GV P2	Principle 2: Foster livability in all communities.	<p>Consistent. The project would replace an aging residential development with a modern mixed-use community. In addition to 4,400 new residential dwelling units, the project would provide up to 325,000 square feet of non-residential uses, including neighborhood-serving retail and office uses, as well as civic spaces. The project's green spaces and recreational amenities would include approximately 10.5 acres of privately maintained, publicly available, common useable open space and parks. In addition, approximately 13.5 acres of semi-private and private recreational amenities would be provided for project residents and would include such features as landscaped courtyards and recreation rooms. As such, approximately 24 acres of public, semi-private, and private recreational and open space would be provided on-site, which would also include 2.4 acres of roof top garden spaces and recreational facilities, and 2.5 acres of private open space.</p> <p>The proposed project is based on principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the site's proximity to the downtown Los Angeles employment hub, the accessibility of public transit, the availability of existing infrastructure to service the proposed uses, and the incorporation of LEED® features that would make the project eligible to achieve LEED® Silver certification. Overall, the project is intended to provide a walkable and livable community with modern amenities and a high-quality design that promotes both environmental and economic sustainability.</p>
GV P2.1	Promote infill development and redevelopment to revitalize existing communities.	<p>Consistent. As discussed above under GV P2, the project is an infill project which would replace an aging residential development with a modern mixed-use community.</p>
GV P2.2	Promote developments, which provide a mix of uses.	<p>Consistent. The project would provide a mix of uses including up to 4,400 residential units comprised of no less than 1,200 rental units and up to 3,200 condominium units; 325,000 square feet of neighborhood-serving retail, office, and civic uses; a civic plaza; an expansive central park; and other open space amenities including active parks, neighborhood greens, neighborhood playgrounds, and landscaped courtyards and pathways.</p>
GV P2.3	Promote "people-scaled," pedestrian-friendly (walkable) communities.	<p>Consistent. The proposed project would improve the existing pedestrian environment by introducing high quality, pedestrian-scaled buildings, varied architecture, and a mix of uses with street frontage improvements. The project would integrate a mix of high-quality building</p>

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
		materials, as well as pedestrian-oriented features such as awnings, street lamps, and landscape elements. Landscaped pathways and bicycle routes would also be introduced throughout the site to connect the various project elements and foster a pedestrian-friendly environment. The new streets and pedestrian pathways would provide multiple routes through and around the property, while offering clear public access and visibility to new neighborhood park spaces. A series of interconnected parks and tree-lined streets would also create physical and visual continuity throughout the site and an inviting pedestrian atmosphere.
GV P2.4	Support the preservation of stable, single-family neighborhoods.	Consistent. The project would not result in the removal of any single-family uses. With regard to single-family uses in the vicinity (located to the north and east), allowable land uses in the blocks facing off-site residential uses to the north and east would be limited to residential, open space, and civic uses. All development within these blocks would have stepped transitional heights up toward the center of the project site would not exceed a height of 35 feet along the project site boundary. The project's retail and high-rise uses would be oriented around the main park in the central portion of the project site, and along the Evergreen Street frontage off Olympic Boulevard, a retail/industrial corridor, near the southern portion of the project site. The project would also provide a transitional high density residential development between the low density residential development to the north and east of the project site and the Regional Center that is designated at Olympic Boulevard and Soto Street.
GV P3	Principle 3: Enable prosperity for all people	Consistent. The project would support community prosperity by: replacing an aged housing development with numerous infrastructural deficiencies with a modern, mixed-use community; providing a variety of housing types, sizes, and costs including affordable units; providing new on-site employment opportunities and construction jobs; promoting pedestrian and commercial activity within a Compass 2% Strategy Opportunity Area; and providing 10.5 acres of privately maintained, publicly available, common useable open space and parks.
GV P3.1	Provide, in each community, a variety of housing types to meet the housing needs of all income levels.	Consistent. The project would provide up to 4,400 new residential units offering a mix of unit sizes, rental/ownership opportunities, and style/density configurations. The housing mix would also include up to 660 affordable housing units including housing for both very low and low income families. The variations in units would result in a

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
		range of housing costs. The proposed project would be phased to provide existing residents the opportunity to relocate to another unit within the site.
GV P3.2	Support educational opportunities that promote balanced growth.	<p>Consistent. The project would include 25,000 square feet of civic use(s) that would consist of community-serving or public facilities. While the precise civic use(s) have not yet been determined and will be established as part of the community planning process, they may include a 15,000-square-foot library, which may contain a computer lab and/or other specialty services or collections.</p> <p>It is anticipated that this facility would be available for public use and/or for use by the two public schools located adjacent to the project site. The project's civic component may also include a 10,000-square-foot multi-purpose community room for use by project tenants and their guests for meetings and social functions. Additionally, through the introduction of extensive landscaping, pedestrian pathways, neighborhood parks, and outdoor seating areas and gathering spaces, the project would create a more inviting, aesthetically pleasing environment on the project site, converting what is currently a private residential use to an attractive and accessible community gathering space. The incorporation of high-quality design materials would provide a unique and valuable respite from the surrounding urban environment. This would support the quality of life needs of both residents and visitors by creating a greater sense of place and encouraging community interaction.</p>
GV P3.3	Ensure environmental justice regardless of race, ethnicity or income class.	<p>Consistent. The project would include 10.5 acres of privately maintained, publicly available, common useable open space and parks, as well as community-serving commercial/retail uses. These ground-level amenities are intended to enhance the public realm and improve the quality of life of all areawide residents and workers, and would be accessible to all members of the public, regardless of race, ethnicity, or income class. Furthermore, no aspect of proposed project development would result in a disproportionate impact to populations that are related to environmental justice issues. In addition, as discussed below under the Urban Decay heading, the Urban Decay Analysis concluded that the amount of retail floor area in the proposed project can be supported entirely by growth in demand from net new project households. Thus, the project's retail would not drain sales away from existing retailers or other planned</p>

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
		retail developments.
GV P3.4	Support local and State fiscal policies that encourage balanced growth.	Consistent. The project would generate tax revenues within a mixed-use project that would provide both residential and commercial uses with pedestrian connections. The project would also provide infill development and would place residential uses in proximity to job-rich areas and public transit. These features of the project would promote balanced growth in support local and state fiscal policies aimed at promoting smart growth and discouraging urban sprawl.
GV P3.5	Encourage civic engagement.	Consistent. See analysis of GV P3.2, above.
GV P4	Principle 4: Promote sustainability for future generations	Consistent. As described further below for the GV P4 sub-principles, the project would support sustainability by providing development in an urban in-fill area proximate to public transit, using resources efficiently, and employing the use of green development techniques so as to be capable of achieving Silver certification under the U.S. Green Building Council's LEED-ND [®] Rating System.
GV P4.1	Preserve rural, agricultural, recreational and environmentally sensitive areas.	Consistent. The project would not cause development within any rural, recreational, or environmentally sensitive areas. The project would replace the existing open space areas on the project site with enhanced open space that features native, drought-tolerant species and a series of urban bioswales designed to collect surface water and provide first flush treatment prior to discharge to the local storm drain system. The proposed project would also retain many of the existing oak and sycamore trees on-site as well as many of the jacaranda trees along Glenn Avenue.
GV P4.2	Focus development in urban centers and existing cities.	Consistent. The project would redevelop a site within an urbanized area and would tie into existing infrastructure systems. Furthermore, the project site is located within a Compass 2% Strategy Opportunity Area, which indicates that it has been identified by SCAG as an opportunity area for the implementation of the Compass Blueprint 2% Strategy to develop compact, mixed-use development with housing and jobs near major transportation infrastructure. The project's mix of uses and proposed density are consistent with the land use and growth patterns envisioned in SCAG's Compass Growth Vision.
GV P4.3	Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and	Consistent. The proposed project is based on principles of smart growth and environmental sustainability, as evidenced in its mixed-use nature, the site's proximity to the downtown Los Angeles employment hub, the

Table IV.G-3 (Continued)
Project Consistency with SCAG RTP and Compass Growth Vision

No.	Goal/Policy	Analysis of Project Consistency
	significantly reduce waste.	accessibility of public transit, the availability of existing infrastructure to service the proposed uses, and the incorporation of LEED® features that would make the project eligible to achieve LEED® Silver certification. Overall, the project is intended to provide a walkable and livable community with modern amenities and a high-quality design that promotes both environmental and economic sustainability.
GV P4.4	Utilize “green” development techniques.	Consistent. The project would be designed to incorporate LEED® features so as to be capable of achieving Silver certification under the U.S. Green Building Council’s LEED-ND® Rating System. Proposed LEED® features would include energy-efficient buildings, pedestrian and bicycle friendly design, and water conservation features. Water conservation features would include a range of techniques that would further enhance site sustainability. Drought tolerant plants and indigenous species would be utilized. Storm water would be collected and cleansed through a first flush filtration system of rain gardens and urban bioswales, both within the parks themselves and throughout the street network. Permeable pavement would also be used wherever possible. Storm water filtration planters would collect roof water. Construction materials would be recycled/reused to the maximum extent feasible and would include the on-site recycling and reuse of concrete removed from existing facilities, the salvaging of existing appliances and fixtures, and additional off-site sorting of construction materials by the waste hauler. For a detailed list of the proposed LEED® features, refer to the Project Design Features heading, above.
<p>Source: Matrix Environmental, 2011.</p>		

(c) Conclusion Regarding Land Use Consistency

Based on the analysis provided above, with approval of the requested Specific Plan, zone change, and the General Plan amendments, the project would be in substantial compliance with the relevant provisions of the local and regional plans and policies that are applicable to the project site. As such, the proposed project’s impacts related to land use consistency would be less than significant.

(2) Land Use Compatibility

Land use compatibility addresses whether a project would be compatible with surrounding uses in terms of use, size and intensity, design, and other elements.

(a) Compatibility of Use

As previously described, the proposed project would replace the existing on-site residential community comprised of 1,187 residential dwelling units with a mixed-use development that includes up to up to 4,400 residential units, up to 300,000 square feet of retail and commercial office uses, and up to 25,000 square feet of civic uses. As a result, the project site would be converted from a private, strictly residential use to a pedestrian-oriented community that would provide a mix of land uses (although still primarily residential) to serve the needs of on-site residents and the community. The project would increase the density, height, and mass of on-site structures as compared to existing conditions. The project would also increase the public accessibility of the site by introducing approximately 10.5 acres of publicly available open space including landscaped pedestrian pathways, bicycle paths, play equipment, athletic courts, seating, and open play areas, as well as ground-level commercial/retail uses including retail stores, restaurants, and outdoor seating areas.

The types of land uses proposed by the project would not be out of character or otherwise incompatible with surrounding development, as the project area is currently developed with and/or zoned for the development of each of the types of land uses proposed by the project. For instance, multi-family residential land uses are located on the project site in its current state and immediately east of the project site (i.e., Estrada Courts), extending further to the east. Multi-family land uses are also interspersed among the single-family uses located immediately north of the project site. A three-story multi-family residential building is also located across the street from the Sears Building on the north side of Soto Street. Low-rise commercial and retail use is prevalent along the Soto Street corridor west of the project site and the Olympic Boulevard corridor south of the project site. Typical uses along these roadways include retail stores, gas stations, fast-food restaurants, and auto repair shops. Civic uses are located immediately south of the project site along Olympic Boulevard including two schools and a pre-school, associated park/recreation facilities, a senior center, and a government service building. With regard to office uses, the types of office uses allowed by the proposed Specific Plan would include any use permitted in the C2 Zone as set forth in Section 12.14 of the LAMC, with the exceptions discussed above beginning on page IV.G-60. Properties in the C2 Zone are located immediately west and southwest of the project site along 8th Street and at the Soto Street/Olympic Boulevard intersection. Thus, although the immediate vicinity currently is not substantially developed with offices uses, the project's office component would not be out of character or otherwise incompatible with allowable land uses within the surrounding

community. Furthermore, office uses in general are typical components of the urban landscape that characterizes the region.

The project's mix of use would provide a number of benefits for the surrounding community. The project would include 10.5 acres of privately maintained, publicly available, common useable open space and parks, as well as community-serving commercial/retail uses. These ground-level amenities are intended to enhance the public realm and improve the quality of life of all areawide residents and workers. Through the introduction of extensive landscaping, pedestrian pathways, neighborhood parks, and outdoor seating areas and gathering spaces, the project would create a more inviting, aesthetically pleasing environment on the project site, converting what is currently a private residential use to an attractive and accessible community gathering space. The incorporation of high-quality design materials would provide a unique and valuable respite from the surrounding urban environment. This would support the quality of life needs of both residents and visitors by creating a greater sense of place and encouraging community interaction. The project would also include 25,000 square feet of civic use(s) that would consist of community-serving or public facilities. While the precise civic use(s) have not yet been determined and will be established as part of the community planning process, they may include a 15,000-square-foot library, which may contain a computer lab and/or other specialty services or collections. If the library is developed, it is anticipated that it would be available for public use and/or for use by the two public schools located adjacent to the project site.

Since the types of land uses proposed by the project are not out of character with the surrounding community, and in fact would offer numerous benefits to the community as discussed above, the project's uses are considered compatible with the surrounding area. Furthermore, the project would not disrupt, divide, or isolate any existing neighborhoods or communities.

(b) Compatibility of Design

The project would increase the density, height, and mass of on-site structures as compared to existing conditions. The project's increased height and density would be greater than most surrounding uses, with the exception of the Sears Building located at the southwest corner of Soto Street and Olympic Boulevard.

With regard to density, while the proposed Project would result in an increase in density, it would be within the FAR that is currently allowed by the LAMC for the project site. Furthermore, as discussed above, the project would expressly limit the overall amount of permitted development to a level below what is permitted under the corresponding

proposed Community Plan land use designations. Thus, the proposed project's density would not be out of character with what is generally expected for the project site.

As discussed in further detail in Section IV.A.1, Aesthetics/Visual Quality/Views, of this Draft EIR, new project development would be subject to the Design Guidelines and Standards in the Specific Plan. In accordance with the Design Guidelines and Standards, the perceived bulk and height of the project would be softened through the use of transitional building heights, articulated building façades, ample open space and landscaping, and screened parking structures so that the new development appears visually compatible with and complementary to surrounding development and typical of a modern, urban community. Proposed buildings adjacent to existing residential neighborhoods to the north and east would be limited in height to 35 feet, and transitional heights would provide a gradual transition from the shorter buildings along the north and east frontages to the taller buildings in the center of the site. In addition, retail uses would be strategically located within the eastern portion of the site along a new internal roadway that would provide access to the north and south and along Olympic Boulevard, which is currently a retail and light industrial corridor anchored by a designated Major Opportunity Site and Regional Center at the Soto Street intersection. All project buildings would have a variety of heights and configurations creating both vertical and horizontal articulation and adding greater dimension to the site design. Additionally, the project would provide a transitional high-density residential development between the low density residential development to the north and east of the project site and Regional Center/Major Opportunity Site to the south.

The proposed project would also replace older, deteriorated uses with a modern development displaying a high-quality design that contributes to the unique identity of the site. In the spirit of the existing Garden Apartment design, the proposed project would be designed around a central green space. Importance would be placed on common open spaces, which would be substantially increased under the proposed project. Key features of the landscaping program would include rows of street trees along all internal roadways as well as the site perimeter, the retention of many of the existing oak and sycamore trees on-site as well as many of the jacaranda trees along Glenn Avenue. The proposed project would also enhance site security by maximizing the instances where "eyes on the street" may provide natural surveillance of the neighborhood, helping to alleviate existing safety concerns and improve the quality of life of residents and visitors. Through these design measures, the project site would continue to convey a recognized sense of place, and compatibility with surrounding land uses.

Based on the above and as analyzed in Section IV.A.1, Aesthetics/Visual Quality/Views of this Draft EIR, the proposed project would be visually compatible with surrounding uses.

(c) Compatibility Relative to Construction Activities

Since construction activities can also be a source of incompatibility, construction is addressed herein. Construction of the proposed project would result in temporary significant impacts associated with air quality and noise. Construction of the project would also result in temporary adverse impacts related to the visual character of the project site. However, these impacts would be short-term in nature and would be mitigated to the extent feasible to minimize environmental impacts and disruption to neighboring streets and properties. Please refer to Sections IV.A.1, Aesthetics/Visual Quality/Views, IV.B.1, Air Quality, and IV.H, Noise, of this Draft EIR for further discussion.

With regard to the potential for resident displacement during construction, as discussed in Section IV.I.2., Housing, of this Draft EIR, the project would implement, through a Development Agreement between the applicant and the City, a Resident Retention Plan in order to ensure that current tenants and residents have a variety of choices for securing new housing, and to encourage tenants and residents to continue living on-site. The Resident Retention Plan is included as Appendix J.4 to this Draft EIR. The Resident Retention Plan would essentially provide two options to current tenants:

Option 1: Tenants may accept a relocation payment and permanently relocate off-site. All residential units at the project site are currently subject to the City of Los Angeles Rent Stabilization Ordinance (RSO). The relocation payment would exceed the minimum requirements of the RSO.

Option 2: Tenants may choose to temporarily relocate on-site during construction of the project to an available existing unit on-site, but outside of the construction area. If a tenant elects to remain on-site during construction, the tenant would be provided with a temporary replacement unit, which would be a comparable apartment located elsewhere within the project site. The tenant may then either: (a) rent an apartment within the project at rents no more than the rent stabilized amount they would pay based upon their current lease; (b) apply their relocation payment toward the purchase a condominium within the project; or (c) relocate off-site (in the event the tenant changes his or her mind after selecting either of the options above). Tenants who choose to rent an apartment within the project would have the opportunity to rent either a designated Affordable Unit (if they can document that they meet the requirements for low-income tenancy) or a market rate apartment at a rent no more than the rent stabilized amount (i.e., the rent as adjusted annually by rent control), they would pay based upon their current lease.

Construction of the project would be phased so that current tenants and residents can live on-site during construction of the new project should they choose to do so. The project's five phases of development have been designed to include new affordable rental

units (restricted to very low- and low-income households) in each phase. Overall, there would be no reduction in the number of apartment units within the project, so there would be a sufficient number of rental units in the project to accommodate each current tenant who wants to relocate within the project. This relocation process would result in a phased redistribution of uses and residents within the project site as the previous site design is developed into the proposed site plan. Overall these impacts would be temporary and would not result in the introduction of incompatible land uses to the project site. With regard to housing impacts during this transitional period, please refer to Section IV.I.2, Housing, of this Draft EIR.

(d) Conclusion Regarding Land Use Compatibility

Based on the discussion above, the proposed project is considered compatible with the surrounding area in terms of both land use type and design. Furthermore, the project would not disrupt, divide, or isolate any existing neighborhoods or communities. As such, the proposed project's impacts related to land use compatibility would be less than significant.

(3) Urban Decay

The project would provide a maximum of 300,000 square feet of neighborhood-serving retail and office-using services. While the final mix of retail and office space would be determined on the basis of market conditions at the time space is developed, this Draft EIR conservatively evaluates the scenario that could potentially have the greatest urban decay impacts: 200,000 square feet of retail/service and related space and 100,000 square feet of office space. Under this "maximum retail" scenario, an illustrative delineation of the retail space by major category was identified for the Urban Decay Analysis, as presented in Table IV.G-4 on page IV.G-79. As shown, community-serving retail uses and associated restaurant space would comprise 125,000 square feet, whereas the remaining 75,000 square feet would be comprised of service space such as a day care facility and gymnasium. The Urban Decay Study also assumed that the retail space would open in three major leasing phases between 2020 and 2030. The study horizon year in the Urban Decay Study is 2032, the first full year in which the project would be occupied.

Two different market areas were established for the project's retail and restaurant/dining uses to provide a geographic frame of reference for understanding the market characteristics of supply and demand for the particular use(s) analyzed. In brief, the two market areas are as follows:

- The Primary Market Area (PMA), defined as the residents who would reside in the project. In order to avoid overstating the potential impact on future retail

Table IV.G-4
Projected Distribution of Space and Total Sales by Major Retail Category
Project Retail Component

Use Category	Square Feet GLA ^a	Project Sales per Square Foot GLA ^b	Projected Annual Retail Sales ^b
Retail			
Shopper Goods/GAFO ^c	43,000	\$315	\$13,545,000
Building Materials/Hardware/Homeware	10,000	\$250	\$2,500,000
Food Stores (Markets, Bakeries, Specialty Foods)	35,000	\$500	\$17,500,000
Drug Store	12,000	\$550	\$6,600,000
Eating and Drinking Facilities	25,000	\$450	\$11,250,000
Subtotal Retail	125,000		\$51,395,000
Other			
Personal Services	15,000		—
Business/Financial Services	20,000		—
Day Care Center	15,000		—
Gymnasium/Health Club	25,000		—
Subtotal, Other	75,000		—
Grand Total	200,000		\$51,395,000
<p>^a GLA: Gross Leasable Area</p> <p>^b Sales expressed in 2009 Constant Dollars.</p> <p>^c GAFO: Acronym for General Merchandise; Apparel and Related Furniture Furnishings; and Other or Specialty Goods. These categories are typically found in limited quantity in neighborhood shopping districts, as their preferred locations are community and regional centers.</p> <p>Source: HR&A Advisors, Inc.; W & W, Inc.</p>			

market activities, the Urban Decay Analysis provides a projection of the net increase in retail sales potential generated by the project's households so that the demand for retail space accounted for by household income in the project's rental units replaces the demand lost from the gradual demolition of the 1,187 existing rental units.

- The Secondary Market Area (SMA), which consists of residents of Boyle Heights and other communities who reside within a 1.5-mile radius around the project, but do not reside within the project. It should be noted that the area encompassed by the SMA has been constrained by its unique geography and development patterns in the vicinity of the project site. These constraints include: (1) limiting the extension of the otherwise circular market area on the west at the Los Angeles River, which, together with existing freeways, limit

accessibility to the project site from the Alameda Industrial Corridor; and (2) limiting the extension of the market area on the south at East Washington Boulevard, recognizing the access limitations imposed by existing railroad operations, industrial land uses and the consequent street pattern.

Based on the Urban Decay Analysis, anticipated growth in demand within the PMA is sufficient to support development of the proposed project's retail component. Over the 18-year period between the onset of project construction and the first full calendar year of project retail operations, the growth in demand for retail goods in the PMA is projected to grow from a deficit of \$5.9 million (due to a net reduction in the number of occupied rental housing units during the first two years of construction) to a net increase of \$158.2 million, an amount that can sustain an additional 133,347 square feet of gross leasable area (GLA) of retail and associated restaurant/dining space, after adjusting for anticipated capture rates to reflect the neighborhood orientation and convenience purposes served by the retail uses, as well as the potential market opportunity represented by project residents. As noted above, the proposed project would provide a maximum of 125,000 square feet GLA of retail and restaurant/dining space, whereas the remaining 75,000 square feet would be comprised of service space such as a day care facility and gymnasium.

Table IV.G-5 on page IV.G-81 shows the projected increase in supportable space, after allowance for the recovery of lost sales from the demolition of existing units, on an annual basis starting with the first positive year of 2018. As shown, the annual growth in supportable retail space would range from 23,417 square feet of GLA in 2018 to 281,647 square feet of GLA in 2032, at the completion of full buildout and occupancy of the project. The distribution of supportable space at full buildout between major retail categories is summarized in Table IV.G-5.

A comparison between the projection of supportable retail space at the project from potential sales generated by its residents and the proposed retail and related space program for the project is shown in Table IV.G-6 on page IV.G-82. It demonstrates that there is a match between the scale of retail space in the illustrative project retail program assumed in the Urban Decay Analysis (refer to Table 3 in Appendix H to this Draft EIR), the amount of retail space that can be supported by the shares of project site household incomes devoted to retail, and the share of supportable retail space that can realistically be captured at the project site. Effectively, the projected capturable space on a category-by-category basis is at least 84 percent or more of the proposed development area, a reflection that the project's residents can effectively provide the vast majority of needed

Table IV.G-5
Summary of Supportable Retail Floor Area Based on PMA Retail Sales Potential

Retail Space Category	Supportable Space
Shopper Goods	146,541
Building Materials/Hardware	37,399
Convenience Goods	
Food/Beverage Stores	44,960
Drug Stores	12,599
Eating and Drinking Facilities	<u>40,148</u>
Total Supportable Retail Space	281,647
<hr/> <i>Source: HR&A Advisors, Inc., W & W, Inc.</i>	

sales support for the proposed space.¹¹ Stated another way, only about half the total project household retail sales potential would be captured by the project's retail component, leaving about half of the total project household retail sales potential generated by the project to be captured by existing Boyle Heights community retailers and/or other new developments planned in the area.¹² Moreover, the illustrative retail program's allowance of 35,000 square feet for Personal, Business and Medical Services, or 17.5 percent of the total available commercial retail and related area, is consistent with the pattern of development in Boyle Heights as reflected in relevant studies of the area (refer to Appendix H to this Draft EIR for further description of the studies reviewed by the Urban Decay Analysis).

Given the match between the projected retail sales support from project resident households and the scale, phasing, and distribution of retail uses in the illustrative project retail program assumed in the Urban Decay Analysis (refer to Table 3 in Appendix H to this Draft EIR), it can be concluded that the amount of retail floor area in the proposed project can be supported entirely by growth in demand from net new project households. There would also be a very small increment of demand generated by the project's office uses. Thus, the project's retail would not drain sales away from existing retailers or other planned retail developments. The projected sales capture at the project site would allow for greater than 50 percent of the potential retail sales generated by the project to be captured by other retail establishments in the community and new retail projects planned by others.

¹¹ As shown in Table IV.G-5, by 2032, the supportable retail space would total 281,647 square feet GLA.

¹² *Id.*

Table IV.G-6
Comparison of Capturable Space at Project with Proposed Retail Space Program Assuming Support is Limited to Net Increase of Retail Sales Support from Project Residents

Space Category	Proposed Program Space	Projected Capturable Space Supported by Project's Net Resident Expenditures	Difference	PMA Resident-Supported Capturable Space as Percent of Total Program Space
Retail				
Shopper Goods/Variety Stores	43,000	43,962	(962)	102.2%
Building Materials/Hardware/Homeware	10,000	11,222	(1,220)	112.2%
Convenience Goods: Food Stores/Beverage Stores	35,000	35,968	(968)	102.8%
Drug Stores/Pharmacies	12,000	10,079	1,921	84.0%
Eating and Drinking Facilities	25,000	32,118	(7,118)	128.5%
Subtotal, Retail Space	125,000	133,347	(8,347)	106.7%
Other				
Gymnasium	25,000			
Day Care Center	15,000			
Personal and Business Services	35,000			
Program Total Space	200,000			
<i>Source: HR&A Advisors, Inc.; W & W, Inc.</i>				

Moreover, additional retail sales would be generated from household growth in the SMA surrounding the project site over the same time period, which would also be available to support other retail establishments in the community and new retail projects planned by others. Therefore, it can be concluded that there is no foreseeable potential for the project to cause conditions of urban decay within the meaning of CEQA, and impacts related to urban decay would be less than significant.

(4) Transfers of Floor Area

The proposed project would allow for some flexibility in terms of the permitted type and amount of each proposed land use, as well as the location, size, height, and style of new buildings. Guidelines and limitations have been defined as part of a proposed Specific Plan that would be used to establish the land use and regulatory framework for the physical development of the project site. Such flexibility would allow the project to respond to changing market conditions over time and best meet the needs of the community. Floor area transfers would not result in new impacts with regard to land use. Floor area transfers

would not alter the proposed mix of uses proposed by the project or the development parameters (e.g., heights, massing, setbacks, and allowable land uses) set forth for the 13 blocks within the Specific Plan area. As analyzed previously, development of the proposed land uses would be consistent with the goals, objectives, and policies of land use plans and would be compatible with surrounding land uses. As such, floor area transfers would not alter the conclusions with regard to land use impacts.

4. Cumulative Impacts

The geographic context for the cumulative impact analysis for land use is the Boyle Heights Community Plan. Future growth through 2030 (the project buildout year), as a result of related projects and general ambient growth, would have the potential to alter the existing land use environment due to infill development at increased densities, conversions of vacant land to new development, and/or conversions of land uses (e.g., commercial to residential). However, future development projects would be subject to existing land use and zoning designations as well as environmental review by the City. Therefore, such future projects are not expected to fundamentally alter the existing land use relationships in the community. Rather, the concentration of development in the area would be expected to promote a more cohesive compatible urban environment.

As indicated in Section III, Environmental Setting, in consultation with LADOT staff, County of Los Angeles staff, City of Vernon staff, City of Commerce staff, and City of Maywood staff, a total of 37 related projects have been identified within a 2-mile radius of the Project Site. The related projects consist of a variety of land uses reflecting the diverse range of allowable land uses in the project vicinity and Boyle Heights Community Plan area as a whole. They include mixed-use, residential, commercial, retail, industrial, and public facility projects. These related projects would occur as urban in-fill within the existing land use patterns and would not alter those patterns.

There is one related project in close enough proximity to the project site so as to contribute to cumulative land use impacts by potentially altering existing land use relationships: Related Project #10 at the intersection of Olympic Boulevard and Soto Street. The remaining related projects are sufficiently distant from the project site so that they would not be anticipated to contribute to cumulative land use relationships. This proposal is for a mixed-use project that includes approximately 728 condominium units, 36 apartment units, 572,620 square feet of shopping center uses, and 165,300 square feet of office space. This related project would presumably increase the building massing in a manner that makes use of and supports the current landmark appearance of that site, as well as the site's Major Opportunity Site and Regional Center designations. The proposed project would complement and support this type of development. Specifically, the proposed project would provide a similar mix of uses in a mid- to high-rise setting that

would complement the high-density, mixed-use, and transit-oriented nature of the related project. In addition to its neighborhood-serving retail and office uses, the project's residential population would support nearby commercial/retail activity. The project's housing units could also provide housing for workers in the Regional Center.

The Urban Decay Analysis in Appendix H to this Draft EIR discusses the potential for Related Project #10 and the proposed project to result in cumulative urban decay impacts. In summary, a review of retail opportunities for the market area suggests that use of a portion of the approximately 20-acre Sears site for a big-box retail center in the range of over 200,000 square feet would not generate urban decay impacts as there is little competition nearby. While the major big-box retailers that could be developed on the property would not likely compete directly for customers with retail users at the proposed project in all sectors, there could be some limited competition for certain specialty retail tenants if the related project site were to be developed as a major retail complex. The feasibility of the Sears site for redevelopment as a mixed-use project with a large retail component is still open to question. Two recent attempts in the last five years have not proven successful, and the Sears building's 1.8 million square feet of space presents unusual challenges that could require substantial public subsidy, together with compromises with preservationists over what portion of the structure must be retained. Thus, while Related Project #10 must be recognized as a competitive influence, particularly for certain tenant types, it is not recognized as a major factor that, together with the development of the proposed project, would lead to conditions that would logically contribute to urban decay as defined by CEQA, at other retail facilities in the surrounding Boyle Heights community. As with the proposed project, future development projects would be reviewed by the City for consistency with relevant land use plans and regulations, including but not limited to the General Plan Framework, the Community Plan, the LAMC, and the City Walkability Checklist. Furthermore, the proposed project would generally be consistent with applicable land use plans, policies, and regulations, and as such would not incrementally contribute to significant cumulative land use inconsistencies. Accordingly, cumulative impacts would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

As noted previously, the project incorporates project design features, including the provisions of the proposed Specific Plan and the Resident Retention Plan. With implementation of these design features, and with approval of the requested actions, the proposed project would be in substantial compliance with the goals and objectives of the applicable regional land use plans, local General Plan and municipal zoning codes. The

proposed project would also be consistent with other adopted environmental goals contained in other applicable plans.

b. Mitigation Measures

With approvals of the proposed project's requested discretionary actions, project-level land use impacts with regard to land use consistency would be less than significant. In addition, project-level land use impacts with regard to compatibility and urban decay would be less than significant. Furthermore, cumulative impacts on land use consistency and compatibility, as well as urban decay, would also be less than significant. Therefore, no mitigation measures would be required.

6. Level of Significance After Mitigation

As indicated above, with implementation of the project design features, project-level and cumulative impacts with regard to land use would be less than significant, and, thus, no mitigation measures would be required.