

1. INTRODUCTION

This section addresses land use impacts associated with the proposed Herald Examiner project. In addition to compatibility with surrounding uses, the consistency of the proposed project with applicable land use plans, policies and regulations is also discussed.

2. ENVIRONMENTAL SETTING

a. Existing Land Use

The proposed project is located in the South Park neighborhood of Downtown Los Angeles, which consists of a mixture of commercial and residential uses. Existing land uses within the vicinity of the project sites include office buildings, retail stores, wholesale outlets, parking structures and surface parking lots. Specifically, prominent facilities in the project vicinity are as follows: the high-rise office complex commonly known as the Transamerica Center, which consists of the SBC Tower, Transamerica Center 2 and Transamerica Center 3 buildings; the Los Angeles Convention Center; the Staples Center; the Fashion Institute of Design and Merchandising (FIDM); and the California Hospital Medical Center. The Broadway and Hill Street sites currently contain vacant commercial structures and the 12th Street site contains a surface parking lot. Land uses immediately surrounding each of the three project sites are discussed in more detail below.

Broadway and Hill Street Sites

Land uses surrounding the Broadway and Hill Street sites generally include commercial uses. Specifically, surrounding the sites are the following uses:

- **North:** Existing land uses north of the Broadway site include restaurants, a theater, parking lots, office buildings, a sewing building, a fashion manufacturing and design outlet, parking and retail shops.
- **South:** Existing land uses south of the Broadway site currently include office buildings.
- **East:** Existing land uses east of the Broadway site include a Job Corp building, parking, storage, textile and import buildings.
- **West:** Existing land uses west of the Broadway site include office buildings, a bank and a manufacturing building.

12th Street Site

Land uses surrounding the 12th Street site generally include commercial and industrial uses. Specifically, surrounding the site are the following uses:

- **North:** Existing land uses north of the 12th Street site currently consist of retail, parking, office buildings, the Job Corp building, imports and textiles.
- **South:** Existing land uses south of the 12th Street site currently include a club, parking, a warehouse, imports, clothing and luggage and handbag retail.
- **East:** Existing land uses east of the 12th Street site currently include a fashion and jewelry plaza, retail shops, textile uses, manufacturing, offices and retail outlets.
- **West:** Existing land uses west of the 12th Street site currently include a parking structure and storage.

b. Relevant Land Use Plans

All development activity on the project sites is subject to the land use regulations of the City's General Plan Framework, adopted in December 1996, the Central City Community Plan and the City of Los Angeles Zoning Code. The Downtown Strategic Plan and the South Park Development Strategies and Design Guidelines (Guidelines) also provide guidance on land use issues relating to area planning and potential site development. The Herald Examiner project is also located within both the City Center Redevelopment Project Area and the Central Business District Redevelopment Project Area. Accordingly, this section will analyze the project's compliance with all these plans, including both the City Center Redevelopment Plan and the Central Business District Redevelopment Plan.

The project sites are also located within the six-county planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated metropolitan planning organization, which is responsible for preparing the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). The proposed project is included within SCAG's City of Los Angeles Subregion. The policies contained in each of these plans that pertain to the project are discussed below.

In general, adopted land use policies for the Downtown Los Angeles area encourage the development of regionally oriented attractions that serve to concentrate activities in the downtown core and to provide for regional housing development. The project serves to implement such policies, as discussed below.

3. REGULATORY FRAMEWORK

a. City of Los Angeles General Plan Framework

Land use and planning within the City of Los Angeles is governed by the City's General Plan. The State of California mandates that every City and County prepare a General Plan. A General Plan is a comprehensive policy document outlining the capacity of future development in a City or County. This policy statement is divided into 11 elements, 7 of which are currently adopted in the City of Los Angeles, including the Framework, Transportation, Housing, Noise, Air Quality, Conservation and Safety Elements, along with the Land Use Element or Community Plan for each of the City's 35 Community Planning Areas. The Land Use Element has the broadest scope of all the General Plan Elements, as it establishes the pattern of land use in the City's communities and sets forth standards and guidelines to regulate development.

The City of Los Angeles General Plan is comprised of the Concept Los Angeles Plan, the Citywide Plan, 35 Community Plans and various state-mandated elements and optional elements. In the Long Range Land Use Diagram for Metro Los Angeles, the project sites are contained within an area designated as Regional Center Commercial. Regional Center areas are intended to serve as focal points of regional commerce, identity and activity. Land uses that are encouraged by the General Plan Framework on Regional Center properties include:

- Corporate and professional offices;
- Retail commercial malls;
- Government buildings;
- Major health facilities;
- Major entertainment;
- Cultural facilities; and
- Region-serving retail commercial malls and retail services, where they complement and support the other uses in the Regional Center.

Regional Centers are generally high-density places that range from a Floor Area Ratio (FAR) of 5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings, as determined in the Community Plan. Due to the high amount of activity that takes place in a Regional Center, it should have easy access to public transportation, both day and night. In addition, good quality street, area and pedestrian lighting is essential to ensure the safety of its patrons.

Central City Community Plan

The proposed project lies within the Central City Community Plan, which includes the downtown area of Los Angeles. The Central City Community Plan Area is located south of Sunset Boulevard and Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10 [I-10]), east of the Harbor Freeway (Interstate 110 [I-110]) and west of Alameda Street.

The Central City is divided into nine districts: the Civic Center; Little Tokyo; Bunker Hill; the Historic Core; Central City East; the Financial Core; the Convention Center/Arena; South Markets; and South Park. The South Park District location is shown in **Figure IV.A-1, Central City Community Plan Districts**, relative to the other districts in the Central City Community. The South Park District is generally bound by the Harbor Freeway (I-110), the Santa Monica Freeway (I-10), 8th Street and Main Street.¹

The Central City Community Plan is the official guide to land use planning and future development within the Central City Community Plan Area and implements the Land Use Element for the City's General Plan. The Central City Community Plan promotes an arrangement of land use, infrastructure and services intended to enhance the economic, social and physical health, safety, welfare and convenience of the people who live, work and invest in the community. By serving to guide development, the plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic and social investments in the community to the extent reasonable and feasible.²

The proposed project is located within the South Park area of the Central City Community Plan. The South Park area houses a mix of residential, medical, commercial, retail and warehouse uses. The Central City Community Plan recognizes a "mixed-use community with a significant concentration of housing" in the South Park area. The sites are designated Regional Commercial by the Community Plan, which corresponds to each site's C2 zoning.

The Central City Community Plan was developed to provide a vision for the Central City area as a community that:

- Creates residential neighborhoods while providing a variety of housing opportunities with compatible new housing;
- Improves the function, design and economic vitality of the commercial districts;

¹ City of Los Angeles Planning Department. Central City Community Plan, October 2004.

² Ibid.

Figure IV.A-1

Central City Community Plan Districts

<http://www.ci.la.ca.us/PLN/complan/pdf/CCYCPTXT.PDF>

- Preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance;
- Maximizes the development opportunities of the future rail transit system while minimizing adverse impacts; and
- Plans the remaining commercial and industrial development opportunity sites for needed job producing uses that improve the economic and physical condition of the Central City Community.

Included within the Central City Community Plan are objectives for key land uses and issues in the Central City area, as identified in **Table IV.A-1**, below.

**Table IV.A-1
Central City Community Plan Land Use Objectives**

Residential Objectives	
1-1	To promote development of residential units in South Park.
1-2	To increase the range of housing choices available to Downtown employees and residents.
1-3	To foster residential development which can accommodate a full range of incomes.
1-4	To facilitate the conversion of historic building in the Historic Core to housing, office, art and cultural uses in order to attract new residents.
1-5	To preserve the existing low-income housing stock, including single-room occupancy (SRO) units.
1-6	To support additions to the housing stock in Little Tokyo.
Commercial Objectives	
2-1	To improve Central City's competitiveness as a location for offices, business, retail and industry.
2-2	To retain the existing retail base in Central City.
2-3	To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows and tourism.
2-4	To encourage a mix of uses that create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.
2-5	To increase specialty and ethnic markets in order to foster a diverse range of retail and commercial uses in Central City.
Open Space and Recreation Objectives	
4-1	To encourage the expansion and additions of open spaces as opportunities arise.
4-2	To maximize the use of the City's existing and envisioned open space network and recreation facilities by providing connections to the open space system.
4-3	To encourage increased use of existing park and recreational spaces.
4-4	To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities and social service programs.
Police Protection Objectives	
5-1	To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.
5-2	To inform developers, design professionals and the public of the possible reduction of criminal opportunities when crime prevention principles are developed during the initial planning stages of development.
Fire Protection Objectives	
6-1	To ensure that fire facilities and protective services are sufficient for the existing and future population and land uses of Central City.

Schools/Education Objectives	
7-1	To site schools in locations complementary to existing land uses, recreational facilities, community identity and as a re-use of historic structures.
Libraries Objectives	
8-1	To assist the City Library Department in providing adequate library service which responds to the needs of the community.
Social Services Objectives	
9-1	To address the problems of the homeless population by creating a mix of policies, services and facilities that better serve their needs.
9-2	To provide the requisite services, housing opportunities and community environments to allow the homeless to rejoin the workforce and lead more productive lives.
Arts, Culture and Architectural History Objectives	
10-1	To ensure that the arts, culture and architecturally significant buildings remain central to the further development of downtown and that it remains clearly discernable and accessible to all citizens in and visitors to Los Angeles.
10-2	To maintain and reuse one of the largest and most distinguished sets of underused historic buildings in the United States.

b. City of Los Angeles Zoning Ordinance

The Los Angeles Zoning Ordinance is the primary tool for implementing the General Plan Land Use Element. For each defined zone, the ordinance identifies the permitted uses and applicable development standards for characteristics of development such as density, height, parking and landscaping requirements.

All three components of the project are currently zoned C2-4D-O, as shown in **Figure IV.A-2, Central City Zoning and Land Use Map**. The zone designation includes the “D” Development Limitation, which relates to floor area and limits the Height District 4 density of 13:1 to 6:1. The “O” signifies that the proposed project is in an Oil Drilling Supplemental Use District.

The C2-4D zone permits a variety of residential, retail and office uses. Its associated height district allows a maximum FAR of 6:1. Various provisions of Zoning Code Section 12.14 (C2 Commercial Zone) allow such specific uses as hotels, restaurants, amusement enterprises, mini-shopping centers, offices, auditorium and arenas, parking lots and parking buildings, as well as residential. Accessory and conditional uses permitted under the C2 zoning designation include pole and dish antennas, solar equipment, signs, nightclubs and the sale of alcoholic beverages.

The maximum density, generally, in the zone is 1 unit for every 400 square feet of lot area (1:400 sq. ft.). However, for mixed-use projects with combined residential and commercial uses that meet certain requirements, such as the proposed project, Los Angeles Municipal Code Section 12.22.A.18(a) allows R5 uses and densities, which includes the higher density of 1 unit for every 200 square feet of lot area (1:200 sq. ft.), with no yard requirements.

Figure IV.A-2

Central City Zoning and Land Use map

(<http://www.ci.la.ca.us/PLN/complan/central/ccyplan.htm>)

The historic rehabilitation elements of the project are also encouraged by the City's Adaptive Reuse Ordinance (the Ordinance), Section 12.22(A)(26)(h) of the Los Angeles Municipal Code. The Ordinance streamlines the permitting process and provides flexibility meeting zoning and building code requirements for Adaptive Reuse projects that convert underutilized commercial buildings to more productive uses such as housing. The Ordinance defines an Adoptive Reuse Project as "any change of use to dwelling units, guest rooms or joint living and work quarters in all or any portion of any eligible building." This ordinance would apply to the Broadway building rehabilitation if a conversion to housing were being requested. As proposed, however, the project currently involves the straight commercial rehabilitation of the building, which will remain commercial but be renovated into its prior prominence and energized with new uses. The Ordinance, however, evidences the importance of both new housing, which other components of the project provide and protection of historic buildings, which the Broadway building component provides.

c. Regional Comprehensive Plan and Guide

SCAG's RCPG was adopted in 1996 as a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision making. The RCPG is intended to serve the SCAG region as a framework for a 20-year horizon. It includes input from each of the 13 subregions that make up the Southern California region (which is comprised of Los Angeles, Orange, San Bernardino, Riverside Imperial and Ventura counties). The project sites are within the City of Los Angeles Subregion.

Adopted RCPG policies related to land use are contained primarily in Chapter 2, Growth Management. The growth management policies in the RCPG encourage local land use actions that could ultimately lead to the development of an urban form that will minimize development costs, save natural resources and enhance the quality of life in the region. Specific growth management policies are divided into four main categories: (1) growth forecasts; (2) improving the regional standard of living; (3) maintaining the regional quality of life; and (4) providing social, political and cultural equity.

The policies related to growth forecasts provide guidance to SCAG in forecasting growth for the entire region and, therefore, are not directly applicable to the project alone. However, several policies related to the RCPG goals in the other three categories are applicable to the proposed project, including:

a. Regional Standard of Living

- Encourage patterns of urban development and land use that reduces costs on infrastructure construction and make better use of existing facilities.

- Support local jurisdictions' efforts to maximize the costs of infrastructure and public service delivery and efforts to seek new sources of funding for development and the provision of services.

b. Regional Quality of Life

- Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled and create opportunities for residents to walk and bike.
- Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.
- Encourage developments in and around activity centers, transportation corridors, under utilized infrastructure systems and areas needing recycling and redevelopment.
- Encourage planned development in locations least likely to cause adverse environmental impact.

c. Social, Political and Cultural Equity

- Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures.

d. SCAG Regional Transportation Plan

In addition to RCPG, SCAG has prepared the 2004 RTP. The RTP is a federal- and state-mandated 20-year transportation plan that envisions the future multi-modal transportation system for the region. In compliance with state and federal requirements, SCAG prepares the Regional Transportation Improvement Program (RTIP) to implement projects and programs listed in the RTP. Updated every other year, the RTIP contains a capital listing of all transportation projects proposed for the region over a six-year period.

e. Central Business District Redevelopment Plan

The Redevelopment Plan for the Central Business District (CBD) Redevelopment Project was adopted by the Los Angeles City Council on July 18, 1975, by Ordinance No. 147,480 and is administered by the Community Redevelopment Agency for the City of Los Angeles (CRA). The CBD Project Area generally encompasses the downtown area of Los Angeles and is roughly bounded by the Hollywood Freeway (US-101) on the north, Alameda Street on the east, the Santa Monica Freeway (I-10) on the south and the Harbor Freeway (I-110) on the west, as shown in **Figure IV.A-3, Central Business District**

Redevelopment Project Area. The primary intent of the CBD Redevelopment Plan is “to eliminate and to prevent the spread of blight in the project area” by:

- Owner and tenant participation by most of the owners and tenants remaining or re-entering the project area;
- Acquisition of real property;
- Relocation assistance to residential and nonresidential occupants displaced from property acquired by the Agency;
- Demolition or removal of some buildings and improvements;
- Installation, construction or reconstruction of streets, utilities and other public improvements;
- Disposition of any property acquired by the Agency;
- Development of land by private enterprise or public agencies for uses in accordance with this plan.

The land use planning goals and objectives contained in Section 401 of the CBD Redevelopment Plan include:

- To assist in the development of Downtown Los Angeles as a major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the concept and Citywide plan portions thereof;
- To create a climate that will prepare Central City to accept that share of anticipated regional growth that is economically and functionally attracted to it;
- To organize growth and change to reinforce viable functions and to facilitate the renewal or rehabilitation of deteriorated and underutilized areas;
- To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation and housing;
- To create a symbol of pride and identity which gives Central City a strong image as a major center of the Los Angeles region;
- To provide an integrated transportation system that will allow for efficient movement of people and good while enhancing the environment, giving special attention to separation of the pedestrian and the automobile;
- To achieve excellence in design, based on how Central City is to be used by people, giving emphasis to parks, green spaces, street trees and places designed for walking and sitting;
- To preserve key landmarks that highlight the history and unique character of the City – blend old and new in an aesthetic realization of change or growth with distinction;
- To provide a full range of employment opportunities for persons of all income levels;
- To provide high- and medium-density housing close to employment and available to all ethnic and social groups and to make an appropriate share of the City’s low- and moderate-income housing available to residents of the area;

- To provide the public services necessary to the solution of the various social, medical and economic problems of Central City residents, especially the Skid Row population; and
- To establish an atmosphere of cooperation among business, special interest groups and public agencies in the implementation of this Plan.

The CBD Redevelopment Plan defines five development areas within the CBD Redevelopment Project Area. These five development areas include: (1) Civic Center Development Area; (2) Central Commercial Core Development Area; (3) Central City East Development Area; (4) South Park Development Area; and (5) Eastside Industrial Park Development Area. The proposed Herald Examiner project is located within the South Park Development Area.

South Park is recognized to be a mixed-use community with a significant concentration of housing. According to the CBD Redevelopment Plan, proposed development in the South Park Development Area “includes a relatively self-sufficient housing-commerce complex focused around a regional park. The predominant land use in the South Park Development Area shall be housing, to be designed for various income groups and family sizes. The remaining land shall be occupied by a significant amount of open space and by commerce. The provision of housing and open space is to be accomplished as a first priority.” The Plan goes on to specifically describe planned land uses for the South Park Development Area both north and south of Pico Boulevard.

The proposed project would be located south of Pico Boulevard, and thus, in an area of South Park identified as an area for open space, public lands, high- and medium-density housing and commercial and parking uses.

f. City Center Redevelopment Plan

Established in May 2002 by the CRA, the Redevelopment Plan for the City Center Redevelopment Project Area has the primary objective of eliminating and preventing blight in the Redevelopment Project Area. The Redevelopment Project Area boundaries are shown in **Figure IV.A-4, City Center Redevelopment Project Area**. A five-year work program was established by the Project Area Committee to address the blight in the redevelopment project area. The goals and objectives for the City Center Redevelopment Project Area set forth by the CRA include:

- Assist in the development of downtown as a major center in the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, Citywide Plan portions and the Central City Community Plan.
- Create a climate that will prepare and allow the Central City to accept that share of regional growth and development that is appropriate and which is economically and functionally attracted to it.

Figure IV.A-3

Central Business District Redevelopment Project Area

(See CRA website)

<http://www.lacity.org/CRA/cbd.html>

Figure IV.A-4, City Center Redevelopment Project Area

- Organize growth and development, reinforce viable functions and facilitate the redevelopment, revitalization or rehabilitation of deteriorated or underutilized areas.
- Create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses such as recreation and housing.
- Create a symbol of pride and identity which gives Central City a strong image as a major center of the Los Angeles region.
- Facilitate the development of an integrated transportation system, which will allow for efficient movement of people and goods into, through and out of the Central City.
- Achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, street trees and places designed for walking and sitting.
- Preserve key landmarks, which highlight the history and unique character of the City, blending old and new in an aesthetic realization of change or growth distinction and facilitating the adaptive reuse of structures of architectural, historic or cultural merit.
- Provide a full range of employment opportunities for persons of all income levels.
- Provide high- and medium-density housing close to employment and available to all ethnic, social and economic groups and to make an appropriate share of the City's low- and moderate-income housing available to residents of the area.
- Establish an atmosphere of cooperation among business, special interest groups and public agencies in the implementation of this plan.
- Support and encourage the development of social services with special consideration given to participating in projects involving community-based organizations that serve runaways, the homeless and senior citizens and provide childcare services and other social services.

g. Greater Downtown Strategic Plan

Approved by the City Council in August 1994, the Downtown Strategic Plan was prepared by an Advisory Committee comprised of over 60 representatives of downtown businesses, industries, residents, developers, social service providers, housing activists and the CRA. The Downtown Strategic Plan proposes a set of initiatives appropriate to Downtown Los Angeles designed to stimulate the renaissance of downtown through the year 2020. The Downtown Strategic Plan builds upon the financial, social and cultural investments that already form a significant foundation for downtown. The Downtown Strategic Plan recognizes the need to maintain the distinct neighborhoods that create diversity in Downtown Los Angeles but also calls for linkages between each of the areas so that greater economic potential can be utilized. The Downtown Strategic Plan also recognizes the need to significantly increase residential opportunities in the Central City community.

The Downtown Strategic Plan sets forth focused initiatives that are appropriate to downtown and that are directed toward a more prosperous and equitable future. The Downtown Strategic Plan is based on the following strategies:

- Interrelating the three distinct composite areas of downtown; the City, the Center City and the Markets,³ by developing these distinct composite areas of downtown individually and jointly to form a greater whole.
- Providing for continuity and change by taking into account existing problems and opportunities and blending new construction with the historic fabric of the existing city.
- Eliminating neighborhood isolation by forming linkages to create greater access and more powerful economic interaction.
- Establishing physical frameworks for access, open space and built form.

The following economic, equity and community objectives contained in the Downtown Strategic Plan are applicable to the proposed project:

Economy

- Create more jobs downtown while also increasing upward employment mobility for downtown workers and others who could benefit from an expanded job base;
- Protect the existing employment base and capture more future office market share by effectively competing with other cities in the region and beyond. Strengthen downtown's position as the pre-eminent business center on the Eastern Pacific Rim and the Western United States;
- Restore to Los Angeles its traditional image as a world magnet for tourist activity. Address the needs of all the visitors who visit downtown for business, conventions, trade shows and tourism.

Equity

- Establish downtown as a model for a socially diverse, integrated and supportive community where the benefits of economic growth are shared by all of its residents as well as those of the surrounding communities;
- Attain a level of safety for the whole of downtown that is expected of the center of a world-class City and desired by those who live, work and visit there. Encourage the clear and accurate perception that downtown is as safe as other regional centers; and
- Attain a level of cleanliness for the whole of downtown that might be expected of the center of a world-class City and desired by those who live, work and visit there. Encourage the clear and accurate perception that downtown is as clean as other regional centers.

³ These three areas refer to geographic subareas of the downtown area. "The City" refers to the northern and western portions of downtown, including the Civic Center area, Bunker Hill, the "Financial Core" characterized by the area of high rise office building concentraion, South Park and the Convention Center. The "Center City" refers to the central core of the downtown area including the Broadway, Spring Street and Main Street corridors. "The Markets" refers to the eastern portion of downtown east of Los Angeles Street, and includes Central City East and the garment, produce and flower market areas.

Community

- Establish a public open space network downtown that is commensurate with its position as the center of a great world-class City. To achieve a high quality of open space at all scales which enhances the quality of life, the economic well being and the health of downtown residents, workers and visitors;
- Establish mixed-income neighborhoods with a significant middle-income base that can become the vehicle to achieve a jobs/housing balance and help give vitality to downtown on a 24-hour basis. Increase housing opportunities for all downtown employees within these neighborhoods. Maintain the commitment to the existing low-income stock;
- Maintain and reuse one of the largest and most distinguished sets of underused historic buildings in the United States. Downtown's historic assets represent irreplaceable financial and cultural investments and are an important inventory of space in the center of the region; and
- Establish downtown as the region's leader in demonstrating the advantages and benefits of environmentally sustainable development. Reduce the overall environmental impact of additional downtown residents and workers.

h. South Park Development Strategies and Design Guidelines

The South Park Development Strategies and Design Guidelines (Guidelines) is a guidance document for the CBD Redevelopment Plan and the Downtown Strategic Plan. These Guidelines were jointly prepared by the South Park task force and the South Park Stakeholders Group (Stakeholders), with support from the CRA. The Stakeholders represent the diverse interests of South Park Area businesses, residents and property owners. The Guidelines establish a basis for the economic, physical and social development and revitalization of the South Park area.

The Guidelines encourage development in the South Park area by suggesting the creation of a pedestrian-oriented, live/work community where people live in proximity to their place of work. Strategies for the future development of the South Park Area build upon existing centers of activity and identify linkages by creating prominent streetscape segments that are targeted for improvement. Gateways, which serve as identifiable points-of-entry, leading into the South Park area, are located to reinforce pedestrian character and express the community's attributes. Linkage improvements are intended to provide a continuous, pleasant environment for pedestrians and to facilitate connections between South Park's activity centers and downtown.

The Guidelines identify five key development proposals to stimulate appropriate development within the South Park area. One of these proposals applies directly to the project site, while the other four apply to other regions within the South Park Area. The Guidelines designate the region of the proposed project as "Fashion Square" given its proximity to the nearby Fashion District and discuss the development of a museum and showroom venue in the area. The area now includes the FIDM, including the expansion of FIDM Galleries in February of 2000.

4. ENVIRONMENTAL IMPACT ANALYSIS

The evaluation below addresses whether the proposed project would conflict with any applicable land use plan, policy or regulation, as identified in **Section IV.A.1**. Consistency with plans related to other environmental topics is discussed in the relevant topical section. For example, consistency of the South Coast Air Quality Management District Air Quality Management Plan is discussed in **Section IV.E, Air Quality**, of this Draft EIR.

a. Significance Criteria

Generally, land use impacts are determined based on a project's consistency with applicable plans and compatibility with surrounding land uses. The *L.A. CEQA Thresholds Guide* states that the determination of a project's significance in terms of land use impacts shall be made on a case-by-case basis, considering the following factors:

- Whether the proposed project is consistent with adopted land use/density designation in the Community Plan, Redevelopment Plan or Specific Plan for the site;
- Whether the proposed project is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;
- The extent of the area impacted, the nature and degree of impacts and the type of land uses within the 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.

b. Project Impacts

First, the project's consistency with surrounding land uses was considered. The project would have a significant impact on land use if:

- *The extent of the area impacted or the nature and degree of impacts are significant and if the project does not complement the type of land uses within the area;*
- *The extent to which existing neighborhoods, communities or land uses would be disrupted, divided or isolated and the duration of the disruptions are significant; or*
- *The number, degree and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project are significant.*

As discussed in **Section III, General Description of Environmental Setting**, as well as in this section, the three project components are located within Downtown Los Angeles, which is an urban setting. The

Broadway and Hill Street sites currently contain vacant structures, used only as occasional filming locations. The 12th Street site contains a surface parking lot. The sites are situated among commercial, office, retail, residential, entertainment and parking uses, including the high-rise office complex commonly known as the Transamerica Center, the Los Angeles Convention Center, the Staples Center, the FIDM and the California Hospital Medical Center. Since the project sites are underutilized urban spaces and the proposed project would include a mixture of residential, commercial and office uses, the project would fit well with surrounding land uses. The proposed project would not add a new land use to the area as the project would provide a mixture of land uses and thus would not result in secondary impacts to surrounding uses or divide the community. Therefore, the project would complement surrounding land uses and would not divide or disrupt the existing neighborhood. Finally, there is no potential for significant secondary impacts to surrounding land uses, because the project involves a mix of land uses, including residential, commercial, office and recreation facilities, rather than a single intensive use, which would potentially increase demand on surrounding land uses. Therefore, no potential for significant land use impacts associated with disrupting or affecting the surrounding community would occur.

In addition to considering the proposed project's consistency with surrounding land uses, the project's consistency with the numerous applicable local plans must also be considered to determine:

- *Whether the proposed project is consistent with adopted land use/density designation in the Community Plan, Redevelopment Plan or Specific Plan for the site, and*
- *Whether the proposed project is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.*

Below is an analysis of the project's consistency or inconsistency with: the City of Los Angeles General Plan Framework; the City of Los Angeles General Plan, including the Central City Community Plan; the City of Los Angeles Zoning Ordinance; the Redevelopment Plan for the Central Business District Redevelopment Project Area; the Redevelopment Plan for the City Center Redevelopment Project Area; the Greater Downtown Strategic Plan; the South Park Design Guidelines; and the SCAG Regional Comprehensive Plan and Guide.

City of Los Angeles General Plan Framework

The proposed project would be consistent with the General Plan Framework's land use objectives for the Regional Center designation. With the rehabilitation of the Broadway building, the project would help establish the area as a focal point of regional identity. The project would also integrate housing with commercial uses and amenities thereby ensuring complementary and supportive uses within the Regional Center. The combined density of the three buildings that compose the project total to a FAR of

6:1. It is thereby within the recommended FAR for Regional Centers. Consequently, the project is consistent with the General Plan Framework policies related to the Regional Center and no significant impacts would result.

City of Los Angeles General Plan – Central City Community Plan

Height District Designation

According to the Central City Community Plan General Plan Land Use map, the land use designation for the proposed project is “Regional Center,” with a corresponding height district designation of 4D.⁴ Within the 4D height district, buildings are limited to a 6:1 FAR. The three components of the project average out to the allowable 6:1 FAR. While the Hill Street and Broadway building can share FAR by right, the 12th Street site could also benefit from the excess FAR at the historic Broadway building by treating the project as a unified site through requesting an FAR Averaging Conditional Use Permit (CUP), pursuant to Los Angeles Municipal Code Section 12.24.W.19. As an alternative to the CUP, other methods of obtaining the requested FAR would include a transfer of floor area (TFAR) from the CRA or a FAR variance or Height District Zone Change and General Plan Amendment from the City of Los Angeles Planning Department.

Objectives

Table IV.A-1, above, identifies the primary objectives of the Central City Community Plan, which implements the City of Los Angeles General Plan for the proposed project area. The Herald Examiner project, as proposed, is consistent with the residential objectives identified in the Central City Community Plan in that implementation of the proposed project would: (1) provide 575 additional residential units in the South Park neighborhood of Downtown Los Angeles; (2) increase the range of housing options available in Downtown Los Angeles to employees and existing residents; (3) provide and foster residential development within South Park; (4) involve the rehabilitation of a historic building (the Herald Examiner building) for office use; and (5) preserve the existing low-income housing stock as it would not include displacement of existing housing.

The proposed project is consistent with the commercial objectives identified in the Central City Community Plan. Implementation of the Herald Examiner project, as proposed, would: (1) provide additional commercial and office space, thus enhancing the Central City’s competitiveness as a location for offices, business, retail and industry; (2) provide additional retail space without displacing any existing retail uses; (3) provide land uses necessary to address the needs of visitors to Downtown Los

⁴ Los Angeles Department of City Planning, 2003. Central City Community Plan Land Use Map. Retrieved from <http://cityplanning.lacity.org/> on November 23, 2005.

Angeles; (4) provide a mixture of land uses which will contribute to creating an active, 24-hour downtown environment; and (5) provide additional retail and commercial space to increase the potential for specialty and ethnic markets.

The proposed project is consistent with the open space and recreation objectives identified in the Central City Community Plan. Implementation of the Herald Examiner project, as proposed, would: (1) provide additional open space between the existing building located on the Broadway site and the newly constructed building proposed on the Hill Street site; (2) provide recreational facilities for the residents of the 575 new residential units; (3) increase the use of existing park and recreational spaces in the vicinity of the project sites; and (4) incorporate open space in the project design. In addition, treated as a consolidated site, the three components would be connected through a streetscape plan that would enhance the pedestrian feel and experience in the area.

The proposed project is consistent with the police protection objectives identified in the Central City Community Plan. Implementation of the Herald Examiner project, as proposed, would: (1) not significantly impact the provision of adequate police services, as analyzed in **Section IV.I.1, Police Protection**, of this EIR; and (2) includes mitigation measures (**MM-PP-1** through **MM-PP-4**) to use crime preventing design features as suggested by the Los Angeles Police Department Crime Prevention Unit, discussed in **Section IV.I.1**. The concept of the Crime Prevention Unit is to provide guidance and design input associated with improving the safety of vacant unimproved lots.

The proposed project is consistent with the fire protection objective identified in the Central City Community Plan, which is to ensure that fire facilities and protection services are sufficient for the existing and future population and land uses of the Central City. Implementation of the Herald Examiner project, as proposed, would result in a less than significant impact with mitigation measures with respect to adequate fire protection services, as explained in **Section IV.I.2, Fire Protection and Emergency Medical Services**. The project sites are within the 1.5-mile standard response distance of the nearest fire station, as required by Los Angeles Fire Code, and correspondence with the Los Angeles Fire Department confirmed that services are adequate to serve the proposed project. Obstruction from construction equipment is noted as a potentially significant impact, but would be mitigated to less than significant with mitigation measures outlined in **Section IV.I.2**.

The proposed project does not conflict with the schools/education objective identified in the Central City Community Plan. Implementation of the Herald Examiner project, as proposed, would not affect the siting or location of public schools. The proposed project does not conflict with the libraries objective identified in the Central City Community Plan. Implementation of the Herald Examiner project, as proposed, would not require the provision of additional library services.

The proposed project is consistent with the social services objectives identified in the Central City Community Plan. Implementation of the Herald Examiner project, as proposed, would not displace any homeless populations or affect the services provided to the homeless. The proposed project is consistent with the arts, culture and architectural history objectives identified in the Central City Community Plan. Specifically, implementation of the Herald Examiner project, as proposed, would maintain, rehabilitate and reuse an existing historic building located on the Broadway site. Therefore, the project is consistent with the objectives of the Central City Community Plan and would not result in any significant impacts.

City of Los Angeles Zoning Ordinance

The City of Los Angeles Zoning Code is a tool to implement the General Plan and provides regulations to preserve public peace, health and safety. According to Section 12.14 of the Municipal Code, the proposed project sites are zoned C2, Commercial Zone, which identifies 70 specific permitted commercial and residential uses within this zone. Uses proposed for the Herald Examiner project, including residential, commercial and parking uses, are allowed within the C2 zone.

The three project sites are zoned General Commercial (C2-4D-O). This commercial zone and associated height district allows a maximum FAR of 6:1. Pursuant to Section 12.24.W.19, a FAR Averaging CUP applies for a unified mixed use development in the Central Business District where the buildings on each individual parcel exceed the permitted floor area ratio so long as the FAR, when calculated as a whole, does not exceed the maximum permitted. Although development proposed on the Hill Street site and the 12th Street site exceeds the permitted FAR individually, when the three sites are taken together, they comply with the area's 6:1 FAR limitation. Thus, with approval of an alternative discretionary grant that would otherwise allow an average FAR of 6:1, the project will be in compliance with the relevant height district.

LAMC Section 12.11.C.4 generally permits a residential density in the zone of 1 unit per 400 square feet lot area. However, LAMC Section 12.22.18.a allows mixed-use properties in certain specified areas to benefit from the higher density limitation of 1 unit per 200 square feet lot area. While the exception allows the project significantly more units by right, the proposed project would require a variance to allow greater density above that. With approval of such a requested variance, the project would be consistent with the applicable density requirements of the LAMC.

Additionally, the project applicant would seek any additional city entitlements as necessary to comply with the LAMC. Therefore, as a result of a discretionary approval process, implementation of the proposed project would be consistent with the City of Los Angeles Zoning Ordinance and would not cause any significant impacts.

Redevelopment Plan for the Central Business District Redevelopment Project Area

The CRA's adopted Redevelopment Plan for the CBD Redevelopment Project Area identifies a primary intent to "eliminate and to prevent the spread of blight in the Project area." The Redevelopment Plan goes on to identify land use planning goals and objectives within the CBD Redevelopment Project Area, as discussed above. Implementation of the proposed Herald Examiner project would further several relevant goals and objectives such as:

- Assisting in the development of Downtown Los Angeles as a major center of the Los Angeles metropolitan region;
- Facilitating the renewal of deteriorated and underutilized areas;
- Contributing to a modern, efficient and balanced urban environment for people by providing a range of entertainment, recreational, commercial and retail uses, including a full range of around-the-clock activities and uses, such as recreation and housing;
- Achieving excellence in design, based on how Central City is to be used by people, giving emphasis to parks, green spaces, street trees and places designed for walking and sitting; and
- Preserving key landmarks that highlight the history and unique character of the City – blend old and new in an aesthetic realization of change or growth with distinction.

The proposed project would achieve the above objectives. It would provide centralized housing to accommodate growth in the South Park area of the Central Business District. Specifically, the project would provide approximately 575 dwelling units within a largely underserved area of Downtown Los Angeles. In addition to providing much-needed housing in the South Park area, retail uses would be integrated into a mixed-use community and built on three currently underutilized properties. Further, the number of residences proposed to achieve this result complies with the CBD Redevelopment Plan's permitted overall average density of 80 dwelling units per acre (§408).

The proposed project would also assist in the redevelopment of downtown, and specifically the South Park area, by rehabilitating the Broadway building, an existing Historical-Cultural Monument. Further, by unifying the Broadway building, the 12th Street site and the Hill Street site with a landscaped streetscape, the proposed project would restore the Central City's emphasis on the pedestrian and open space. Finally, the proposed new mixed-use tower buildings would provide residential, commercial and retail uses within a cohesive urban environment, thereby connecting the new building to the historic Broadway building and contributing toward the Central City's image as a major metropolitan center of the Los Angeles region.

The CBD Redevelopment Plan permits a maximum FAR of 6:1 (§413.d.1). The unified project development has up to 6:1 average FAR, which is consistent with the intent of the CBD Redevelopment

Plan. In the alternative, an FAR variation or TFAR may be obtained to ensure consistency with all land use and planning goals and objectives outlined within the CBD Redevelopment Plan, ensuring no potential for significant impacts with regard to consistency with the CBD Redevelopment Plan.

Redevelopment Plan for the City Center Redevelopment Project Area

The Community Redevelopment Agency's adopted Redevelopment Plan for the City Center Redevelopment Project Area identifies a number of goals and objectives, as identified in the environmental setting discussion above. Implementation of the proposed Herald Examiner project would further the implementation of these Redevelopment Plan goals and objectives by:

- Contributing toward the development of Downtown Los Angeles as a major city center through the construction of a mixed-use project that would provide 575 new residential units, 39,610 square feet of retail space and 39,725 square feet of office space in the South Park neighborhood of Downtown Los Angeles;
- Creating additional housing opportunities through the construction of 575 new condominium units, which will prepare and allow the Central City to accept its share of regional growth and development;
- Facilitating the redevelopment of three properties, the Broadway site, Hill Street site and 12th Street site, which are either unused or underutilized;
- Creating around-the-clock activities, including housing, in the Central City area;
- Contributing toward the creation of a symbol of pride and identity in the Central City through retaining and rehabilitating an historic building, City of Los Angeles Historic-Cultural Monument No. 178;
- Contributing toward excellence in design through the rehabilitation of an historic building and artistic style of the new buildings designed by a renowned architect;
- Preserving and rehabilitating an historic building formerly used for the production of the Los Angeles Herald Examiner;
- Providing housing for approximately 1,087 individuals in 575 condominium units employed in the Central City area;
- Providing high-density housing close to employment concentrations; and
- Providing mixed-use buildings that will contribute toward establishing an atmosphere of cooperation among businesses, special interests groups and residents.

The same FAR and density requirements are contained within the City Center Plan and the above analysis applies. The proposed project would contribute to the achievement of the City Center Redevelopment Project goals and, therefore, would not result in potentially significant impacts with regard to consistency with the City Center Redevelopment plan.

Greater Downtown Strategic Plan

The CRA's Greater Downtown Strategic Plan identifies a number of economic, equity and community goals, as identified in the environmental setting discussion above. Implementation of the proposed Herald Examiner project would further the implementation of these goals by:

- Creating short-term, temporary jobs associated with project construction and providing longer-term office and/or commercial space for full-time jobs in the Downtown Los Angeles area;
- Creating an environment conducive to the conduct of business by expanding office and commercial space in the Downtown Los Angeles area;
- Protecting the existing employment base by adding to, rather than displacing any commercial, office or industrial uses;
- Retaining the traditional retail base by adding to, rather than displacing any commercial, office or industrial uses;
- Addressing service needs for visitors to the downtown area;
- Providing a diverse and integrated mixture of land uses;
- Establishing a mixed income neighborhood to support the jobs/housing balance and help give vitality to downtown on a 24-hour basis; and
- Maintaining, rehabilitating and reusing an historic building within Downtown Los Angeles.

Therefore, the proposed project would be consistent with many of the Downtown Strategic Plan's goals and would not conflict with any of its identified goals associated with economic, equity and community improvements in the Greater Downtown Los Angeles area. As such, the project would not create significant impacts in regards to consistency with the Downtown Strategic Plan.

South Park Development Strategies and Design Guidelines

Development of the project would help implement the goals and objectives contained in the South Park Development Strategies and Design Guidelines (Guidelines). As discussed in **Section IV.B, Population and Housing**, of this Draft EIR, the project is expected to increase area employment by providing an estimated 260 jobs. Consequently, the project would be consistent with the Guidelines' objective of creating a pedestrian-oriented, live/work community, in which people live in varying degrees of proximity to their place of work. In addition, the project would complement the Guidelines strategy of expanding existing centers of activity in South Park near established transit lines, including Los Angeles County MTA bus routes, the Metro Red and Blue Lines and DASH bus routes. The project is also expected to stimulate other development within the South Park area by encouraging economic investment in the area and achieving a high-quality urban design that improves pedestrian areas and landscaping. Specifically, the streetscape, circulation and architecture of the project all serve to unify the

site. The project would feature an enhanced streetscape along Broadway and the resulting pedestrian circulation would connect the three parcels. The streetscape is designed to have common landscaping to further unify the three parcels. The two new residential buildings would be designed by a common architecture firm, and, therefore, the buildings would employ similar architectural themes resulting in a cohesive project design.

The Guidelines identify five “Key Development Proposals” for South Park. The area applicable to the project is labeled “Fashion Square.” It suggests that the Broadway building may, in the future, be restored and rehabilitated into a fashion museum and showroom venue. The Guidelines were written in January 1995. Since that time, the FIDM Museum and Galleries, located at 919 South Grand Avenue, have significantly expanded their gallery space to 11,000 square feet on the first floor of the building and serve this purpose for the neighborhood. The Museum now hosts approximately two to three exhibits a year featuring traveling exhibitions, the work of FIDM students, FIDM-designed installations and selections from the Museum’s permanent collection. The Museum receives approximately 75,000 to 100,000 visitors annually. The Museum’s most popular exhibit, entitled the Art of Motion Picture Costume Design, alone received approximately 50,000 visitors over the course of its installation.

With respect to its permanent collection, FIDM employs standard museum practices for continued acquisition and preservation of costumes and textiles. The FIDM houses a collection of over 10,000 costumes, accessories and textiles from the 18th century to the present day. Its collection is one of the largest such collections in the United States and top designer holdings include Chanel, Yves Saint Laurent, Dior and Lacroix. The Annette Green Perfume Museum, America’s only museum dedicated to the historical and cultural roles of fragrance around the world, will be permanently housed at the FIDM starting in the spring of 2006. The FIDM also houses the early Hollywood Costume Collection on loan from the City of Los Angeles, Department of Recreation and Parks.

As shown above, the FIDM is a preeminent fashion museum that houses one of the most unique collections in the country. As such, there is no longer a need for a fashion museum at the Broadway site, nor is there any public assistance being requested to fund such a public use. Rather, the project’s cultural contribution is the careful rehabilitation of the building to its former prominence, while its mixed use nature supports the fashion square concept by including much needed retail, commercial and office uses for the Fashion District. The proposed project satisfies the Guidelines’ goals for the South Park area as a whole.

The project is, therefore, consistent with the Guidelines and would not result in any significant impacts in regards to consistency with the Guidelines.

SCAG Regional Comprehensive Plan and Guide (RCPG)

Implementation of the project involves the redevelopment of an existing unimproved parking lot and underutilized building and the rehabilitation of an historic structure. This type of infill development serves to implement several SCAG policies including, but not limited to:

- Maximizing the use of existing urbanized areas accessible to transit through infill and redevelopment by concentrating mixed-uses connected with a unified streetscape;
- Minimizing the need for new infrastructure through concentrated infill development;
- Implementing redevelopment in and around an activity center in an area needing redevelopment; and
- Encouraging planned infill development in an underutilized location least likely to cause adverse environmental impact.

The project sites are accessible to existing public transit facilities. The MTA operates several north-south-aligned bus routes on Grand Avenue, Olive Street, Hill Street, Broadway and Main Street in the vicinity of the project. The MTA also operates several east-west-aligned bus routes that travel on Pico Boulevard, Olympic Boulevard and 9th Street. DASH bus routes provide service in the vicinity of the project. The DASH primarily serves Downtown Los Angeles, and the LADOT operates five commuter express routes in the project area. In addition, the MTA operates the Metro Red and Blue Lines in the project vicinity. The Metro Red Line provides rail transportation through Downtown Los Angeles, the Mid-Wilshire District and North Hollywood. The Red Lines also stops at Union Station, thereby linking the project area to the continually expanding rail network. The Metro Blue Line provides north-south service between Downtown Los Angeles and the City of Long Beach.

Employment growth directly attributable to the project will have a significant positive impact on employment in the Central City area and will assist in the recovery of Downtown Los Angeles, which has been in decline since the recession of the 1990s. As referenced in **Section IV.B, Population and Housing**, the project is expected to provide approximately 575 new residential units and an estimated 260 jobs, which are within the established growth parameters of both the Central City area and the Los Angeles Subregion as a whole. Accordingly, the project's effects upon population and housing are considered to be neither adverse nor significant, and the project appropriately implements the regional policies for the area. No new major infrastructure facilities would be needed to service the project. Any necessary relocation of, or improvements to, existing infrastructure needed as a result of the project would enlarge the already extensively developed infrastructure in this area and would be consistent with the SCAG policy of maximizing the use of developed areas through infill and redevelopment.

In sum, the project is consistent with SCAG's RCPG policies and would not result in any significant impacts.

c. Cumulative Impacts

After site-specific discretionary approvals are obtained for additional density FAR, implementation of the proposed Herald Examiner project, on its own, would not result in land use incompatibilities or plan inconsistencies; thus no significant land use impacts would occur. In considering the proposed project's cumulative contribution, with those from the list of related projects identified in **Section III, General Description of Environmental Setting**, the proposed projects, as well as the related projects would be consistent with the City's General Plan, the City's Municipal Ordinance for site zoning, as well as CRA's adopted Redevelopment Plan for the Central Business District Redevelopment Project Area and the Central City Redevelopment Project Area, the Greater Downtown Strategic Plan and the Guidelines. Implementation of the proposed projects would further the goals and objectives of these plans, ultimately contributing to a revitalized, renewed and economically and culturally diverse Central City. Therefore, the proposed project would neither on its own, nor as a cumulative contribution to development in the greater Downtown Los Angeles area, result in a significant cumulative impact.

d. Mitigation Measures

The project would not result in any significant environmental impacts upon known land use plans or surrounding land uses and, therefore, no mitigation measures are required.

e. Adverse Effects

No significant impacts to land use would result from the proposed project; therefore, no adverse effects to land use in the Central City area would be anticipated upon project implementation.