
IV. ENVIRONMENTAL IMPACT ANALYSIS

F. LAND USE

ENVIRONMENTAL SETTING

Existing On-Site Land Uses

The 0.57-acre project site is located in an urbanized area of the City of Los Angeles and is bounded by Comstock Avenue to the west, Wilshire Boulevard to the north, The Los Angeles Country Club to the east, and Club View Drive to the south (see Figures II-1 and II-2 in Section II (Environmental Setting)). The irregularly-shaped project site is currently vacant and houses no existing structures. It has recently been employed for seasonal use, both as a pumpkin sales lot and as a Christmas tree sales lot. It was also used as an equipment storage yard during construction of the UCLA Medical Center.

Existing Surrounding Land Uses

The area surrounding the project site is developed with multi-level residential buildings, single-family residential uses, a hotel, and the Los Angeles Country Club. “The Comstock,” a 20-story high-rise apartment building, is located to the northwest of the project site on Wilshire Boulevard. To the north of the project site is a Department of Water and Power (DWP) power plant. The Los Angeles Country Club adjoins the project site on two sides: directly north, across Wilshire Boulevard; and directly east. South of the project site, across Club View Drive, are four two-story single-family residential uses. West of the project site, on the corner of Wilshire Boulevard and Comstock Avenue, is the four-story Beverly Hills Plaza Hotel. Photographs of these surrounding land uses are provided in Figures II-10 through II-13 in Section II (Environmental Setting).

Applicable Land Use Plans and Codes

The following local and regional land use documents are applicable to the project site and are discussed in more detail below:

- City of Los Angeles General Plan;
- Westwood Community Plan;
- West Los Angeles Transportation Improvement and Mitigation Specific Plan;
- Wilshire-Westwood Scenic Corridor Specific Plan;
- City of Los Angeles Planning and Zoning Code;
- Westwood Community Design Review Board Specific Plan

- Southern California Association of Governments *Regional Comprehensive Plan and Guide*;
- South Coast Air Quality Management District *2003 Air Quality Management Plan*; and
- Metropolitan Transportation Authority *Comprehensive Management Plan*.

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan) addresses community development goals and policies relative to the distribution of land use, both public and private. The General Plan integrates the citywide elements and community plans, and gives policy direction to the planning regulatory and implementation programs. The Land Use Element of the General Plan is divided into 35 community plans for the purpose of developing, maintaining, and implementing the General Plan. These community plans collectively comprise the Land Use Element of the General Plan. The project site is located within the areas covered by the Westwood Community Plan. Thus, all development activity associated with the proposed project would be subject to the land use regulations set forth in the Community Plan.

Westwood Community Plan

The project site is located within the Westwood Community Plan (“Community Plan”) Area, which is generally bounded by Sunset Boulevard and the Bel Air Community on the north; the City of Beverly Hills on the east; Santa Monica Boulevard and the West Los Angeles Community on the south; and the Veterans Administration property, the Brentwood-Pacific Palisades Community, and Sepulveda Boulevard on the west. Sited within the Community Plan Area’s boundaries are some significant land uses including the University of California at Los Angeles (UCLA), Westwood Village, the Los Angeles Country Club, and the Mormon Temple. The predominant land use in the Community Plan Area is residential, with the average net density for all housing types at 19 units per acre. Approximately three percent of the land is designated for commercial use. The Community Plan designates the project site as High Multiple-Family Residential, which allows development of approximately 163.5 multi-family dwelling units per acre.¹

The Community Plan sets forth goals and objectives to maintain the community's distinctive character by:

¹ *The Westwood Community Plan states that this number depicts the reasonable expected population and dwelling units for the year 2010, using the midpoint of the range for the “dwelling units per net acre” category. The midpoint represents a reasonable factor, since new development within each land use category is unlikely to occur at the extremes of the range, but more likely, throughout the entire range.*

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible housing opportunities;
- Improving the function, design and economic vitality of commercial areas;
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance;
- Maximizing development opportunities around future transit systems while minimizing any adverse impacts on residential neighborhoods; and
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base and through design guidelines and physical improvements, enhancing the appearance of these areas.

Relevant goals and objectives of the Westwood Community Plan as they pertain to the proposed project, along with an assessment of the project's consistency with those goals and objectives, are presented below in the "Environmental Impacts" subsection of this EIR chapter.

West Los Angeles Transportation Improvement and Mitigation Specific Plan

The project site is located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan Area (TIMP). The TIMP area is generally bounded by the City of Beverly Hills, Beverwil Drive, Castle Heights Avenue, National Boulevard, and Hughes Avenue on the east; Sunset Boulevard on the north; the City of Santa Monica and Centinela Avenue on the west; and Venice Boulevard on the south (see Figure II-3 in Section II (Environmental Setting)). The intent of the TIMP includes the following areas of focus:

- Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new development within the Transportation Specific Plan Area;
- Establish the Transportation Impact Assessment (TIA) Fee process for new development in the C, M, and P zones;
- Require that new development mitigate Significant Transportation Impacts caused by development in the R-3 and less restrictive zones;
- Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
- Establish a Transportation Specific Plan Area infrastructure implementation process;
- Promote area-wide transit enhancement through additional transit lines, shuttles, transit centers and facilities which expedite transit flow;

- Promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersections from severe overload;
- Prevent Peak Hour Level of Service (LOS) on streets and intersections from reaching LOS “F” or, if presently at LOS “F,” preclude further deterioration in the Level of Service;
- Promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Ensure that the public transportation facilities that will be constructed with funds generated by the Transportation Specific Plan will significantly benefit the contributor; and
- Encourage Caltrans to widen the San Diego Freeway for high-occupancy vehicle (HOV) lanes.

Impacts associated with the TIMP are discussed in Section IV.H (Traffic/Transportation) of this EIR.

Wilshire-Westwood Scenic Corridor Specific Plan

The project site is located within the Wilshire-Westwood Scenic Corridor Specific Plan (“Corridor Specific Plan”) Area. The Corridor Specific Plan area follows Wilshire Boulevard, which is designated as a Scenic Highway, and is generally bounded by Lindbrook Drive to the north, Club View Avenue to the east, Ashton Avenue to the south, and Glendon Avenue to the west (refer to Figure II-4 in Section II (Environmental Setting)). The Corridor Specific Plan is intended to implement expressed policies set forth in the Scenic Highways Plan that address the unique character of this portion of Wilshire Boulevard. Specific criteria have been established to guide the on-going and future development within this area. It is the purpose of the development standards established in the Corridor Specific Plan to minimize traffic and parking problems along Wilshire Boulevard, enhance the aesthetic qualities of the Specific Plan Area, encourage more open space, reduce the impact of high-density residential development and reduce the impact of shadows caused by high-rise buildings within and adjacent to the Specific Plan Area.

Zoning Designations

The development of the proposed project is also governed by the applicable land use, zoning, and subdivision regulations in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes the development standards for the various zoning districts in the City of Los Angeles. As shown in Figure IV.F-1, Zoning Designations, the project site is zoned [Q]R5-3 (Multiple Dwelling, Height District No. 3), which is consistent with the High Multi-family Residential density General Plan land use designation of the project site. As set forth in LAMC 12.16, the following uses are permitted in the R5 zone:

- single-family dwelling
- two-family dwelling
- two, single-family dwellings
- group dwellings
- multiple dwellings
- apartment houses
- boarding or rooming houses
- light housekeeping rooms
- accessory buildings
- hotels
- motels
- apartment hotels
- retirement hotels
- clubs or lodges
- hospitals or sanitariums
- fraternity or sorority houses and dormitories
- parks, playgrounds or community centers
- accessory buildings
- child care facilities
- nursery schools
- churches
- schools, elementary and high, or educational institutions
- museums or libraries

The associated Height District No. 3 limits the floor area of a building to ten times the buildable area of the lot (LAMC Section 12.21.1). In accordance with the [Q] condition (Ordinance No. 163,194), development on the project site is subject to Design Review, administered by the Westwood Community Design Review Board. The following development standards set forth in the Zoning Ordinance apply to the R5 zoning:

Front Yard: There shall be a front yard of not less than 15 feet; provided, however, that on key lots the minimum front yard shall be 10 feet.

Side Yard: For a main building not more than two stories in height there shall be a side yard on each side of said building of not less than five feet, except that where the lot is less than 50 feet in width, the side yard may be reduced to 10 percent of the width of the lot, but in no event to less than three feet in width. For a building more than two stories in height, one foot shall be added to the width of such side yard for each additional story above the second story, but in no event shall a side yard of more than 16 feet in width be required.

Figure IV.F-1, Zoning Designations

- Rear Yard:** There shall be a rear yard of not less than 15 feet in depth. For a building more than three stories in height, one foot shall be added to the depth of such rear yard for each additional story above the third story, but such rear yard need not exceed 20 feet.
- Lot Area:** Every lot shall have a minimum width of 50 feet and a minimum area of 5,000 square feet. The minimum lot area per dwelling unit shall be 200 square feet. However, where a lot has a width of less than 50 feet or an area of less than 5,000 square feet and was held under separate ownership or was of record as of September 23, 1956, and the lot was created in conformance with the Subdivision Map Act, the lot may be occupied by any use permitted in this section, except for those uses explicitly requiring more than 5,000 square feet of lot area. In no case, however, shall more than two dwelling units be permitted where a lot has an area of less than 4,000 square feet.
- Parking:** As discussed in further detail in Section IV.H (Traffic/Transportation), off-street automobile parking requirements consist of two spaces per unit for a required total of 70 parking spaces and one half spaces per unit for guest parking for a required total of 18 spaces.

As indicated in Figure IV.F-1, Zoning Designations, zoning to the north of the project site includes [Q]PF-1XL (Public Facility Zone, Height District Extra Limited), A1-1XL (Agricultural Zone, Height District Extra Limited), and [Q]R5-3. Properties to the south of the project site are zoned R1-1 (One-Family Zone, Height District 1). Properties to the west are zoned [Q]R5-3 and properties to the east are zoned A1-1XL.

SCAG Regional Comprehensive Plan and Guide

The Southern California Association of Governments' (SCAG) Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 by the member agencies of SCAG to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making. It includes input from each of the 13 subregions that make up the Southern California region (comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial and Ventura Counties). The RCPG serves 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 with respect to the significant issues and changes, including growth management, that can be anticipated by the year 2015 and beyond. Adopted RCPG policies related to land use are contained primarily in Chapter 2 of the RCPG, entitled Growth Management. The purpose of the Growth Management Chapter is to present forecasts which establish the socio-economic parameters for the development of the Regional Mobility and Air Quality Chapters of the RCPG, and to address issues related to growth and land consumption by encouraging local land use actions which could ultimately lead to the development of an urban form that would help minimize development costs, save natural

resources, and enhance the quality of life in the region. Impacts associated with air quality and regional mobility are discussed in Sections IV.C (Air Quality) and IV.H (Traffic/Transportation), respectively.

South Coast Air Quality Management District Air Quality Management Plan

The proposed project is also located within the South Coast Air Basin (SCAB) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The Air Quality Management Plan (AQMP), adopted in 1997 by SCAQMD and SCAG to assist in fulfilling these responsibilities, is intended to establish a comprehensive regional air pollution control program leading to the attainment of state and federal air quality standards in the SCAB area. Air quality impacts of the proposed project and consistency of the project impacts with the AQMP are analyzed in greater detail in Section IV.C (Air Quality) of this Draft EIR.

Congestion Management Program

The Congestion Management Program (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements), cities, counties, and other eligible agencies must implement the requirements of the CMP. Within Los Angeles County, the Metropolitan Transportation Authority (MTA) is the designated congestion management agency responsible for coordinating the County's adopted CMP. The project's Traffic Impact Analysis, which is presented in greater detail in Section IV.H (Traffic/Transportation) of this Draft EIR, was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (LADOT) Guidelines.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

This analysis of land use impacts considers both the compatibility of proposed uses with adjacent land uses and the consistency of the proposed project with adopted plans and policies that govern land use on the project site. The significance criteria employed in this analysis were based on a review of the factors identified in the City of Los Angeles L.A. Draft CEQA Thresholds Guide. For purposes of this analysis, a significant land use impact would occur if any of the following circumstances are met:

- The project is inconsistent with the adopted land use/density designation in the community plan, redevelopment plan, or specific plan for the project site;
- The project is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans; and/or
- The interface of physical and operational characteristics of the project is substantially incompatible with the surrounding land uses.

Project Impacts

Consistency with City Zoning Classification and Requirements

The proposed project would develop the 0.57-acre project site with a 21-story (i.e., 301-foot-tall) multi-family residential building, which would contain 35 condominium units. The existing zoning for the project site is [Q]R5-3 (Multiple Dwelling, Height District No. 3). Uses that are permitted in the R5 zone include (among others) multi-family residential land uses. The Height District 3 designation requires that the total floor area not exceed ten times the buildable area of the lot. In accordance with the [Q] condition (Ordinance No. 163,194), development on the project site is subject to Design Review, administered by the Westwood Community Design Review Board. However, the project would be designed and developed in accordance with the zoning requirements described previously in this section. Thus, the proposed project is consistent with the adopted City zoning classification and requirements for the project site.

Consistency with the Westwood Community Plan

As discussed previously, the land use designation for the project site, as established by the Westwood Community Plan, is High Multi-Family Residential, which allows development of 163.5 multi-family dwelling units per acre. Based on density allowed under the land use designation, the maximum number of multi-family units that could be developed on the site would be approximately 93 units. As the proposed project consists of 35 units, it would be consistent with the Community Plan land use designation. As shown in Table IV.F-1, Project Consistency with Applicable Westwood Community Plan Policies, the proposed project is consistent with all applicable policies of the Westwood Community Plan.

**Table IV.F-1
Project Consistency with Applicable Westwood Community Plan Policies**

Objectives	Policies	Consistency Discussion
Residential		
<p>Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.</p>	<p>1-1.1: Protect existing single-family residential neighborhoods from new out-of-scale development and other incompatible uses.</p>	<p>Consistent: The Community Plan Map identifies lands where single-family development is permitted. The project is consistent with the land use designation for the site and would be designed and developed with all applicable zoning regulations, including bulk, height, density, and design review requirements that would minimize the potential for any land use conflicts.</p>
	<p>1-1.2: Protect the quality of residential environment and promote the maintenance and enhancement of the visual and aesthetic environment of the community.</p>	<p>Consistent: The project includes several design characteristics that are similar to design elements found in the surrounding community. Further, the project would be required to undergo Design Review, which would further ensure that the project design would complement the aesthetic environment of the community.</p>
	<p>1-1.3: Provide for adequate multi-family residential development.</p>	<p>Consistent: The project includes the development of 35 multi-family units, which would be developed on a site that is designated for multi-family residential land uses.</p>
<p>Objective 1-2: To coordinate residential density with infrastructure and to reduce vehicular trips and pass-through traffic in single family neighborhoods by developing new multiple-family housing in proximity to services and facilities.</p>	<p>1-2.1: Locate higher density residential within designated multiple family areas and near commercial centers and major bus routes where public service facilities and infrastructure will support this development.</p>	<p>Consistent: The project site is designated as high multi-family residential and is located in Westwood near a substantial amount of commercial development just off of Wilshire Boulevard, which is a primary travel route in the City of Los Angeles that accommodates multiple bus routes.</p>
<p>Objective 1-3: To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.</p>	<p>1-3.1: Require architectural and height compatibility for new infill development to protect the character and scale of existing residential neighborhoods.</p>	<p>Consistent: The project includes several design characteristics that are similar to design elements found in the surrounding community. Further, the project would be required to undergo Design Review, which would further ensure that the project design would complement the aesthetic environment of the community.</p>

**Table IV.F-1
Project Consistency with Applicable Westwood Community Plan Policies**

Objectives	Policies	Consistency Discussion
<p>Objective 1-4: To promote the adequacy and affordability of multiple-family housing and increase its accessibility to more segments of the population.</p>	<p>1-4.1: Promote greater individual choice in type, quality, price and location of housing, including student housing within one mile of the UCLA campus.</p>	<p>Consistent: The Community Plan allocates adequate lands for a variety of residential densities, types and sizes. The project is consistent with the land use designation established under the Community Plan. The North Westwood Village Specific Plan includes provisions for the creation of university-oriented housing. The project site is not within the North Westwood Village Specific Plan area and is not designated as a site that requires construction of University housing.</p>
	<p>1.4.2: Ensure that new housing opportunities minimize displacement of residents.</p>	<p>Consistent: The project site is currently vacant, and as such, implementation of the project would not displace any residents.</p>
<p>Open Space</p>		
<p>Objective 4-1: To preserve existing open space resources and where possible develop new open space.</p>	<p>4-1.1: Encourage the retention of passive and visual open space in balance with development in the community.</p>	<p>Consistent: The project site is currently a vacant lot. A portion of the project site would be designed as landscaped open space. In addition, a spa, swimming pool, and large deck are proposed as part of the project.</p>
<p>Police Protection</p>		
<p>Objective 7-1: To provide adequate police facilities and protection to correspond with population and service demands.</p>	<p>7-1.1: Consult with the Police Department in the review of development projects and land use changes to determine law enforcement needs and requirements.</p>	<p>Consistent: As part of approval of a building permit, the project applicant would be required to submit the proposed project plans to the Los Angeles Police Department (LAPD) for review. During this review, the LAPD would determine the need for additional enforcement or requirements.</p>
<p>Objective 7-2: Increase the ability to minimize crime and provide adequate security.</p>	<p>7-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with community based policing, foot and bicycle patrols, watch programs and regular communication with neighborhood and civic organizations.</p>	<p>Consistent: Operation of the proposed project would include crime prevention features such as nighttime security lighting and secure parking facilities.</p>

**Table IV.F-1
Project Consistency with Applicable Westwood Community Plan Policies**

Objectives	Policies	Consistency Discussion
	<p>7-2.2: Ensure that landscaping around buildings does not impede visibility and that adequate lighting is provided around buildings.</p>	<p>Consistent: As part of approval of a building permit, the project applicant would be required to submit the proposed project plans to the LAPD and Los Angeles Fire Department (LAFD) for review. During this review, the LAPD and LAFD would confirm that the design of the project meets all of the Departments' standards for safety, including landscaping and lighting. The project applicant would be required to incorporate any additional requirements into the project design.</p>
Fire Protection		
<p>Objective 8-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land use.</p>	<p>8-1.1: Coordinate the review of significant development projects and General Plan amendments with the Fire Department to determine the impact on service demands.</p>	<p>Consistent: As part of approval of a building permit, the project applicant would be required to submit the proposed project plans to the LAFD for review. During this review, the LAFD would determine the need for additional enforcement or requirements.</p>
Transportation		
<p>Objective 12-1: To provide parking in appropriate locations in accordance with Citywide standards and Community needs.</p>	<p>12-1.2: Develop parking lots and garages in accordance with design standards.</p>	<p>Consistent: The proposed project includes 103 parking spaces. This is consistent with the required parking. For a more detailed discussion please refer to Section IV.H (Traffic/Transportation). Further, the parking garage would be developed in accordance with all applicable design standards.</p>
<p>Objective 15-1: To comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary road access and street improvements are provided to accommodate traffic generated by new development.</p>	<p>15-1.1: Maintain a satisfactory LOS for streets and highways that should not exceed LOS "D" for secondary highways and collector streets; nor LOS "E" for major highways or major business districts.</p>	<p>Consistent: As is demonstrated in Section IV.H. (Traffic/Transportation), the proposed project will not result in any significant traffic impacts.</p>
<p><i>Source: Westwood Community Plan and Christopher A. Joseph & Associates, 2004.</i></p>		

Exemption from the Wilshire-Westwood Scenic Corridor Specific Plan

On June 29, 1977, the Los Angeles City Planning Department issued a Conditional Negative Declaration (CND) for a condominium project at 10250 West Wilshire Boulevard (CND-213-77-SUB). The Tentative Tract Map (TTM) was recorded on October 31, 1979. Conditions for TTM 27025 provide that development on the project site be limited to no more than 35 units and a minimum of 103 parking spaces.

Although the proposed project is within the Corridor Specific Plan area, it is exempted from the Corridor Specific Plan's provisions. The Corridor Specific Plan does not apply to a project, if a tract map application for a project was filed for City approval during the period of July 25, 1972 and June 5, 1980, (Ordinance 155,044, Section 14.A). The Tract Map application for the proposed project was filed in 1977 and therefore is exempt from the provisions of the Corridor Specific Plan.

Even though the proposed project is exempt from the provisions of the Corridor Specific Plan, the following statements demonstrate how the proposed project complies with various elements of that plan.

- The proposed 21-story condominium project conforms to all provisions contained within the Westwood Community Plan and design guidelines.
- The shadow analysis (see Section IV.B (Aesthetics)) indicates project compliance with the Specific Plan criteria.
- No ventilation equipment would be located within public view.
- Architectural Design is in compliance (see Section IV.B (Aesthetics)).
- No part of the parking garage, other than access ramps, would be visible from any of the streets. Roof decks resulting from the parking structure are integrated with the extensive landscape program of terraces and gardens.
- Landscape material would be compatible with the context of the Wilshire-Westwood Scenic Corridor including special consideration to major project entrances, trees 50 feet high at maturity, and landscaping that would provide a transition between building scale and human scale (see Figure III-18, Landscape Plan).

Land Use Compatibility

The proposed project is consistent with the land use designation and zoning for the project site. Further, the project is consistent with the land use pattern along Wilshire Boulevard, which generally includes multi-family, high-rise apartments and condominiums. Furthermore, the proposed project would be subject to design review to assure compatibility with surrounding development in terms of design massing and architectural integrity. Therefore, no significant impacts would result from the proposed project with regard to land use compatibility.

CUMULATIVE IMPACTS

Development of the related projects is expected to occur in accordance with adopted plans and regulations. Development of the proposed project in conjunction with the related projects would result in an intensification of existing prevailing land uses in the project area. In addition, based on the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support important local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

MITIGATION MEASURES

Because the proposed project is consistent with existing land use regulations and adjacent land uses, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts associated with land use consistency would be less than significant.