4.9 LAND USE AND PLANNING

INTRODUCTION

This section evaluates the Project’s potential land use impacts based upon the physical compatibility of the Project with its surrounding area and vicinity, and consistency with applicable local and regional plans, regulations and policies of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating environmental impacts. Whether the Project would physically divide an established community, or impact any applicable habitat conservation plan or natural community conservation plan is discussed in Section 6.5 (Effects Not Found to be Significant) of this Draft EIR.

ENVIRONMENTAL SETTING

Project Site and Surrounding Land Uses

Existing On-Site Land Uses

Site 1
Site 1 is currently developed with a 30,788 square foot, two-story office building built in 1959 that is occupied by 93 employees from the County Department of Parks and Recreation (“DPR”), a surface parking lot north of this building with 20 spaces, an unoccupied 13,325 square foot one-story office building constructed in 1956, with 41 rooftop parking spaces accessed from 6th Street, a surface parking lot containing 79 spaces located between the two office buildings, and a seven-story, 235,248 square foot parking structure (six stories above grade and one story below grade) containing 864 spaces, built in 1958, that connects to the existing County office building and serves all County facilities in the area.

Site 2
Site 2 is currently developed with a 154,793-square foot, 12-story County office building built in 1964 that is occupied by 973 employees from the Department of Mental Health (“DMH”), an approximately 52,000 square foot, four-story office building built in 1958 that is occupied by 250 employees from the Workforce Development, Aging, and Community Services Department (“WDACS”), and a 14,010 square foot parking structure with one level below grade and one level at-grade and containing 53 spaces, built in 1959.

Site 3
Site 3 is currently developed with a 29,292-square foot, four-story office building built in 1963 and occupied by 112 employees from DPR, and an at-grade parking lot at the rear and north of the existing building containing 65 spaces.

Photos of the existing land uses on the Project Site are presented in Figures 3-3 through 3-7 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

Surrounding Uses

The Project Sites are located in an urbanized, “Transit Priority Area” containing commercial, office, retail, institutional, and multi-family residential uses, as discussed in Section 3.0, Project Description and Environmental Setting, of this Draft EIR. Site 1 is bounded by a retail center and parking structure on the north, a Walgreens pharmacy and a car wash across Vermont Avenue to the west, Site 2 to the south, and...
an office building to the east, north of the existing parking structure. Site 2 is bounded by Site 1 to the north, the Walgreens and a City parking lot across Vermont Avenue to the west, Young Oak Kim Academy and a multi-family residential complex to the south, and a restaurant with surface parking lot and an auto repair shop to the east. Site 3 is bounded by a retail center with surface parking lot to the north, an apartment building to the west, a vacant auto service center to the south, and a religious institution (the Islamic Center) to the east across Vermont Avenue. Photographs of the areas surrounding the Project Sites are included in Figures 3-8 through 3-12 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

Applicable Land Use Policies and Regulations

The Project Sites are located in the Wilshire Center/Koreatown community of the City of Los Angeles. As such, the Project Sites are subject to applicable policies and zoning requirements of several local and regional plans. At the regional/subregional level, the Project is subject to the State Senate Bill 375, Southern California Association of Governments’ (“SCAG”) 2008 Regional Comprehensive Plan, SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”), SCAG’s Southern California Compass Blueprint Growth Vision Report, the South Coast Air Quality Management District’s (“SCAQMD”) 2016 Air Quality Management Plan (“AQMP”), and the Los Angeles County Metropolitan Transportation Authority’s (“Metro”) Comprehensive Management Plan for Los Angeles County (“CMP”).

Site 1

Site 1 is located in the City of Los Angeles, but the property is owned by the County and would be developed for County use, and thus, is not subject to City of Los Angeles land use regulations, pursuant to California Government Code Section 53090 et. seq. At the same time, Site 1 is not specifically addressed by the County General Plan because it is located in the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Site 1. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies and also, as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, addresses the Project's consistency with City of Los Angeles General Plan and policies. Section 65402 of the California Government Code states that, if a city general plan has been adopted, a County cannot authorize or construct a building within the city limits until the city's planning agency has received and reported upon the project's conformity with the city's general plan. The planning agency has 40 days to report on the conformity with the general plan and failure to timely respond becomes a conclusive determination that the project conforms to the city general plan. Although exempt from City of Los Angeles building and zoning requirements, Site 1 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review proposed development on Site 1 for consistency with the County General Plan.

Site 2

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would be constructed on County land for mixed use residential and commercial development under a ground lease. Development of Site 2 would be subject to the City of Los Angeles General Plan, Zoning Ordinance and building regulations.
Site 3

Site 3 is located in the City of Los Angeles, on land owned by the County. Development on Site 3 would consist of (i) a senior affordable housing project to be developed and operated in partnership with a non-profit housing corporation and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit.

Government Code Section 26227 authorizes the Board of Supervisors to make County real property available to a non-profit corporation or association to operate programs that serve the social needs of County residents, and to finance improvements and enter into leases or other transactions to carry out such public benefit programs. In light of the current shortage of deed-restricted senior affordable housing and the need for community and recreational facilities in the area, the proposed development on Site 3 would result in substantial public benefits to County residents. The County therefore intends to exercise its sovereignty under California Government Code Sections 53090 et. seq. and 26227 and exempt Site 3 from City of Los Angeles zoning regulations.

Site 3 is not specifically addressed by the County General Plan because it is located in the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Site 3. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies, and also, as part of the inter-jurisdictional consultation process required in Section 65402 of the California Government Code, addresses the Project's consistency with City of Los Angeles land use plans and policies. Although exempt from City of Los Angeles building and zoning requirements, Site 3 development would be required to comply with County Building Code requirements and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review proposed development on Site 3 for consistency with the County General Plan.

At the local level, applicable plans include the County of Los Angeles General Plan 2035, City of Los Angeles General Plan ("General Plan"), County and City General Plan Housing Elements, Los Angeles Wilshire Community Plan ("Community Plan"), Plan for a Healthy Los Angeles, and Wilshire Center/Koreatown Redevelopment Plan. The Adaptive Reuse Incentive Areas Specific Plan, City of Los Angeles Municipal Code ("LAMC"), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code ("Planning and Zoning Code"), and the City's Walkability Checklist would be applicable to development of Site 2. Not all of these plans are applicable to each of the Project Sites. An overview of each of these plans and regulations is provided below, including identification of the applicability of individual plans to individual Project Sites. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to an environmental impact analysis.

State

Senate Bill 375 (Sites 1, 2 and 3)

In 2006, Governor Schwarzenegger signed Assembly Bill 32 ("AB 32") into law, which requires that California greenhouse gas ("GHG") emissions be reduced to 1990 levels by 2020. Subsequently, the Legislature adopted Senate Bill 375 ("SB 375") as one means of meeting the mandate of AB 32. Effective as of January 1, 2009, SB 375 directs local governments to modify their approach to regional planning and calls for the integration of transportation, land use, and housing in regional plans.
SB 375 requires the California Air Resources Board ("CARB") to develop regional reduction targets for GHG emissions, and calls for the creation of regional plans to reduce those emissions from vehicle use (passenger vehicles and small trucks) throughout the State. With those targets in mind, California’s 18 Metropolitan Planning Organizations, including SCAG, were required to develop a “Sustainable Community Strategies” ("SCS"). The Metropolitan Planning Organizations are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed GHG reduction targets by 2020 and 2035. The Metropolitan Planning Organizations must develop an Alternative Planning Strategy if the Sustainable Community Strategies cannot reach the regional target.

SB 375 has special provisions that apply to SCAG. It states that “a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy...for that subregional area.” In addition, SB 375 authorizes SCAG to “adopt a framework for a subregional SCS or a subregional Alternative Planning Strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships.” Finally, SB 375 requires SCAG to “develop overall guidelines, create public participation plans, ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.”

On April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS. Among other design concepts, these principles call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors. Sponsors of SB 375 have stated that because most people commute to work, and cars and light trucks generate approximately 30 percent of the GHG emissions in California, reducing the amount of GHGs emitted into the environment is partially dependent on increasing the number of jobs near residential development to shorten commute times. According to the principles of “smart growth,” solutions to ever-increasing commute times and distances include enabling more Californians to live near where they work and/or to increase public transportation ridership. The theory behind SB 375 is that if Californians spend less time and travel fewer miles in their vehicles, those vehicles would emit fewer GHGs. This can be done, in part, by locating growth in areas already devoted to urban uses that are readily accessible to transit.

Regional Plans

2008 Regional Comprehensive Plan (Sites 1, 2 and 3)

SCAG prepared and issued the 2008 Regional Comprehensive Plan ("RCP") in response to SCAG’s Regional Council directive in the 2002 Strategic Plan to define solutions to inter-related housing, traffic, water, air quality, and other regional challenges.1 The most recent RCP, adopted October 2, 2008, serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life.2 The RCP incorporates principles and goals of the Compass Blueprint Growth Vision, as discussed below. The RCP includes nine chapter subjects: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. Each chapter is organized into three sections: goals,

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outcomes, and action plans. Each action plan contains “Constrained Policies,” which provide a series of recommended near-term policies that developer and key stakeholders should consider for implementation.

**Southern California Compass Blueprint Growth Vision (Sites 1, 2 and 3)**

The Southern California Compass Blueprint Growth Vision Report (“Compass Growth Vision”), published by SCAG in June 2004, presents a comprehensive vision for growth in the six-county SCAG region, as well as the means of achieving that growth vision. The Compass Growth Vision is intended to provide planning guidance and mechanisms for improved mobility, livability, prosperity, and sustainability for all Southern Californians by reorienting development around existing and planned transportation infrastructure on just two percent of the region’s land area. The Compass Growth Vision notes that limitations on the amount of undeveloped land suitable for development may hinder the ability to accommodate new housing and jobs within the region. The report identified that, under current adopted general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land. Infill, or new development in already developed areas, would be relied upon to provide locations for nearly half of the anticipated new housing region-wide. The Compass Growth Vision concludes that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure would prove to be of enormous benefit in accommodating future growth, while also recognizing that incremental and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to individual cities. These projected benefits led to the Compass Growth Vision being incorporated into the region’s RTP and SCS, as discussed below.

The Compass Growth Vision principles and related strategies are the following:

**Principle 1.** Improve mobility for all residents. Strategies to support Principle 1 include: (a) encourage transportation investments and land use decisions that are mutually supportive; (b) locate new housing near existing jobs and new jobs near existing housing; (c) encourage transit-oriented development; and (d) promote a variety of travel choices.

**Principle 2.** Foster livability in all communities. Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote “people scaled,” pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.

**Principle 3.** Enable prosperity for all people. Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.

**Principle 4.** Promote sustainability for future generations. Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate
pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

A comprehensive review and consistency analysis for each of the Compass Growth Vision principles is discussed in detail and compared to the Project in Table 4.9-1, Consistency with Compass Growth Vision Principles.

**Regional Transportation Plan/Sustainable Communities Strategy (Sites 1, 2 and 3)**

Federal guidelines require that all new regionally significant transportation projects be included in a Regional Transportation Plan (“RTP”) before they can receive federal or State funds or approvals. Metro submits the program of Los Angeles County projects for inclusion in the Regional Transportation Improvement Program. The RTP must be updated and federally approved every three years. Federal approval requires a positive demonstration that the RTP projects would not generate travel emissions that exceed those assumed in the applicable Air Quality Management Plan; this requirement is known as “transportation conformity”.

As previously discussed, SCAG adopted the most recent RTP/SCS on April 7, 2016. The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region’s residents. In the RTP/SCS, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB, as required by SB 375. The RTP/SCS provides an alternative to “business as usual” development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by State and federal agencies in April 2016, the RTP/SCS includes approximately $556.5 billion in projected funding for transportation projects for Los Angeles County.

The RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region’s needs through 2040. The RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2016-2040 RTP/SCS is guided by and incorporates all projects from Metro’s own Long-Range Transportation Plan.

The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. These policies include identifying regional strategic areas for infill and investment, planning for additional housing and jobs near transit, and planning for changing demand in types of housing. To this end, the 2016 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s High Quality Transit Areas (“HQTAs”). HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, avoid greenfield development, create local jobs, and have the potential to improve public health and housing affordability. The Project Sites are located within an HQTA originally identified by SCAG in 2012 and expanded in the 2016 plan. A consistency analysis of the goals and policies relevant to the Project is provided in Table 4.9-2 (Project Consistency with the Applicable Goals of the RTP/SCS). The regional transportation impacts of the Project are analyzed in greater detail in Section 4.14 (Traffic and Transportation) of this Draft EIR.

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3 SCAG, 2016 RTP/SCS, Exhibit 5-1, page 77.
South Coast Air Quality Management District (Sites 1, 2 and 3)

The Project Sites are located within the South Coast Air Basin (“Basin”) and are, therefore, within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 15-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population’s exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

Air quality impacts of the Project and consistency with the AQMP are analyzed in greater detail in Section 4.2 (Air Quality) of this Draft EIR.

Congestion Management Plan (Sites 1, 2 and 3)

In Los Angeles County, Metro is the designated congestion management agency responsible for coordinating regional transportation policies. The 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. Metro is the designated congestion management agency responsible for coordinating the County’s adopted CMP. The Project’s traffic study, which is presented in greater detail in Section 4.14 (Transportation and Traffic) 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.

Local Plans

County of Los Angeles

County of Los Angeles General Plan 2035 (Sites 1, 2 and 3 for informational purposes)

The Los Angeles County 2035 General Plan was adopted by the Los Angeles County Board of Supervisors on October 6, 2015. The 2035 General Plan provides the policy framework for how and where the unincorporated County will grow through the year 2035, while recognizing and celebrating the County’s wide diversity of cultures, abundant natural resources, and status as an international economic center. Comprising approximately 2,650 square miles, unincorporated Los Angeles County is home to over one million people. The 2035 General Plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in the County and the region.

As noted above, Site 1, as a County use, and Site 3, as a public benefit project, both located on property
owned by the County, would not be subject to the City of Los Angeles’ land use regulations, pursuant to California Government Code Sections 53090 et. seq. and 26227. At the same time, Sites 1 and 3 are not specifically addressed by the County General Plan since they are located in the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Sites 1 and 3. Nevertheless, this Draft EIR evaluates the Project’s consistency with applicable County General Plan policies, and also, as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, addresses the Project’s consistency with the City of Los Angeles General Plan and policies.

**City of Los Angeles**

**City of Los Angeles General Plan**

Site 1 (for informational purposes)

As stated above, Site 1 is not subject to the City of Los Angeles General Plan or zoning. However, because Site 1 is located in the City of Los Angeles, it is not specifically addressed by the County General Plan. Therefore, there are no adopted land use plans that directly apply to Site 1. Nevertheless, this Draft EIR evaluates the Project’s consistency with the City of Los Angeles General Plan and policies as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, even though the City’s land use designations and policies do not directly apply to Site 1.

Site 2 (Applicable)

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would include mixed residential and commercial uses under a ground lease, and would be subject to City zoning and building regulations. Land uses on Site 2 are guided by the City of Los Angeles General Plan. The City of Los Angeles General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the City of Los Angeles General Plan consists of the General Plan Framework Element, which addresses citywide policies, and includes the 35 community plans that guide land use at a local level.

Site 3 (for informational purposes)

As stated above, Site 3 is not subject to the City of Los Angeles General Plan or zoning. However, because Site 3 is located in the City of Los Angeles, it is not specifically addressed by the County General Plan. Therefore, there are no adopted land use plans that directly apply to Site 3. Nevertheless, this Draft EIR evaluates the Project’s consistency with the City of Los Angeles General Plan and policies as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, even though the City’s land use designations and policies do not directly apply to Site 3.

Although development of Sites 1 and 3 are not directly guided by the land use designations contained in the City’s General Plan, the Project as a whole across all three Sites is evaluated against pertinent policies of the City of Los Angeles General Plan in this Draft EIR since all three Sites are located in the City. The analysis of Sites 1 and 3 is provided for informational purposes for the reasons indicated above, while the analysis of Site 2 addresses the applicable land use designations and policies of the City.
The City of Los Angeles General Plan Framework Element ("City Framework"), adopted in December 1996, and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. City Framework land use policies are implemented at the community level through community plans and specific plans.

The City Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City’s residential neighborhoods and commercial districts. The City Framework includes a Long Range Land Use Diagram for the metro region, which identifies the Project Sites as a Regional Center. According to the City Framework’s Long-Range Land Use Diagram for the metro region, the Regional Center is an area targeted for high-density land uses, and a focal point of regional commerce, identity, and activity.4 Table 3-1 of the City Framework lists the following as “encouraged uses” within a Regional Center: corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and comparable uses.5 In addition to these land uses, a Regional Center contains a diversity of land uses, such as mixed-use structures which integrate housing with commercial uses, and multi-family housing (independent of commercial), along with the inclusion of small parks and other community-oriented activity facilities.6 Regional Centers generally have a range of floor area ratios from 1.5:1 to 6.0:1. Some Regional Centers are only commercially oriented, while others contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by buildings ranging from 6 to 20 stories high (or higher). Regional Centers are usually major transportation hubs.7

The Urban Form and Neighborhood Design chapter of the City Framework establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and citywide scales. The City Framework does not directly address the design of individual neighborhoods or communities, but embodies generic neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the update of community plans. With respect to neighborhood design, the City Framework’s Urban Form and Neighborhood Design chapter encourages growth in centers that have a sufficient base of both commercial and residential development to support transit service.

The Open Space and Conservation chapter of the City Framework calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes, and utility rights-of-way, or

4 City of Los Angeles Department of City Planning, City of Los Angeles General Plan Framework, Long Range Land Use Diagram, Metro.
5 Op. Cit., Table 3-1, Land Use Standards, page 3-23.
7 Op. Cit., Table 3-1, Land Use Standards, page 3-23.
pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

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

City of Los Angeles General Plan Housing Element (Sites 1 and 3 for informational purposes; applicable to Site 2).

The 2013-2021 Housing Element of the General Plan is the City’s blueprint for meeting housing and growth challenges (“City Housing Element”). The 2013-2021 City Housing Element replaces the 2006-2014 Housing Element. The citywide Housing Element 2013-2021 was adopted on December 3, 2013 and contains current population and housing projections for the City.

The City Housing Element identifies a need for more housing, as it stated that the “City of Los Angeles continues to grow, and with that growth comes the need for more housing – not only more units, but a broader array of housing types to meet evolving household types and sizes, and a greater variety of housing price points that people at all income levels can afford.”

Chapter 6 of the City Housing Element lists the goals, objectives, policies and programs that “embody the City’s commitment to meeting housing needs.” The City’s four housing goals are:

- **Goal 1**: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.
- **Goal 2**: A City in which housing helps to create safe, livable and sustainable neighborhoods.
- **Goal 3**: A City where there are housing opportunities for all without discrimination.
- **Goal 4**: A City committed to preventing and ending homelessness.

Wilshire Community Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Project Sites are located in the Wilshire Community Plan area. The Wilshire Community Plan provides objectives and policies designed to guide and promote planned development of the Community Plan area. The Wilshire Community Plan area designates all three Project Sites for “Community Commercial” land uses.

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9 Los Angeles Department of City Planning, Housing Element 2013-2021, page c-xiii.
10 Los Angeles Department of City Planning, Housing Element 2013-2021, page 6-6.
Plan for a Healthy Los Angeles (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Plan for a Healthy Los Angeles ("Healthy LA Plan") lays the foundation to create healthier communities for all Angelenos. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City’s future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City of Los Angeles will strive to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement.

City of Los Angeles Adaptive Reuse Incentive Areas Specific Plan (Applicable to Site 2)

The City of Los Angeles adopted the Adaptive Reuse Ordinance in 1999 to help revitalize the Greater Downtown Los Angeles Area and implement the General Plan by facilitating the conversion of older buildings, many of which are economically distressed and historically significant, to more productive uses. The ordinance applied to the modification of buildings constructed before 1974, or designated historical structures, located in the downtown area. In 2002, the City adopted the Adaptive Reuse Incentive Areas Specific Plan ("Specific Plan"), which extended the provisions of the Adaptive Reuse Ordinance to other areas of the City, including Chinatown, Lincoln Heights, the Hollywood Community Redevelopment Project Area, certain portions of the Wilshire Center/Koreatown Community Redevelopment Project Area, and Central Avenue south of Freeway Number 10 and north of Vernon Avenue. With respect to the Wilshire Center/Koreatown Community Redevelopment Project Area, the provisions of the Specific Plan apply to all areas of the Redevelopment Project Area, except for some properties located south of Olympic Boulevard. Accordingly, Site 2 is located within the Adaptive Reuse Incentive Areas Specific Plan. The Specific Plan defines an Adaptive Reuse Project as any change of an existing non-residential use to new dwelling units, guest rooms, or joint living and work quarters in all or any portion of a building constructed prior to July 1, 1974, or a historically significant building. Under the Adaptive Reuse Specific Plan, dwelling units, joint living and work quarters and guest rooms are not subject to the lot area requirements of the zone or height district. In addition, the required number of parking spaces shall be the same as the number of spaces that existed on Site 2 on March 1, 2003, and shall be maintained and not reduced.

City of Los Angeles Planning and Zoning Code (Applicable to Site 2)

All on-site development activity on Site 2 is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. Site 2 is zoned C2-1 (Commercial, Height District 1).

The Site 1 City zoning classification is C2-1 for the office buildings and surface parking lot areas, and the zoning classification for the existing Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 3 is zoned C2-1. However, as discussed above, City zoning and building requirements do not apply to Sites 1 and 3.

City of Los Angeles Permitted Land Uses (Applicable to Site 2)

C2 is a commercial zone, which allows for the construction of a variety of commercial uses, including retail stores, offices, restaurants, parking structures, as well as hotel and multi-family residential uses. The Project would include uses that are within these categories and would therefore be consistent with the C2 zoning designation.
4.9 Land Use and Planning

Height District (Applicable to Site 2)

The Site 2 is located within Height District 1. Height District 1 permits development at a Floor Area Ratio ("FAR") of 1.5:1 with no height limit (i.e., height is only limited by the allowable floor area). Although the existing Site 2 office building exceeds the C2-1 1.5:1 floor area, the Adaptive Reuse Specific Plan nevertheless permits adaptive reuse of the existing commercial square footage for residential and ground floor commercial uses. However, the new construction proposed at Site 2 would require entitlements from the City of Los Angeles to exceed the 1.5 to 1 floor area limitation otherwise allowed by the C2-1 zone/height district.

City of Los Angeles Parking Requirements (Applicable to Site 2)

Parking requirements for commercial and residential development are subject to the Planning and Zoning Code. For commercial land uses, one parking space is required for every 500 square feet of floor area.¹¹ For residential land uses, one parking space is required for each unit with less than three habitable rooms (i.e., typical studio unit), 1.5 spaces for each unit with three habitable rooms (i.e., typical one-bedroom unit), and two spaces for each unit with more than three habitable rooms (i.e., typical two and three bedroom units).¹²

Department of City Planning Walkability Checklist (Applicable to Site 2)

In January of 2007, the Department of City Planning created the Walkability Checklist: Guidance for Entitlement Review ("Walkability Checklist"). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the City Framework. Incorporating these guidelines into a project’s design encourages pedestrian activity, more adequate forms, and place making.

Wilshire Center/Koreatown Redevelopment Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Wilshire Center/Koreatown Redevelopment Plan (the “Redevelopment Plan”) was adopted under the provisions of State law by the City of Los Angeles on December 13, 1995. The objectives of the Redevelopment Plan are to promote the redevelopment, rehabilitation, and revitalization of the Redevelopment Project Area. The Redevelopment Project Area generally extends from 11th Street and 12th Street on the south, Vermont Avenue and Wilton Avenue on the west, 5th Street on the north, and Hoover Street on the east, with two additional areas extending north of 5th Street on both sides of Vermont Avenue north to the Hollywood Freeway, and along both sides of Western Avenue north to Melrose Avenue, respectively. Sites 1 and 2 are located in an area designated in the Redevelopment Plan as Community Commercial. Site 3 is located in an area designated for High/Medium Residential use.

¹¹ LAMC Section 12.21.A.4(x)(3).
ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G to the State CEQA Guidelines

The potential for the Project to result in impacts associated with land use is based on the thresholds specified by Appendix G to the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below.

Threshold 4.9-1: Would the Project physically divide an established community.

Threshold 4.9-2: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Threshold 4.9-3: Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan.

Affirmative answers to any of these questions would represent a significant impact. The Project would have a less-than-significant impact with respect to physically dividing an established community (Threshold 4.9-1), because there is no residential community located within the Project Sites, and conflict with any applicable habitat conservation plan or natural community conservation plan (Threshold 4.9-3), because no such plans are applicable to the Project Sites. The analyses for these determinations are provided in Section 6.5, Effects Found Not to be Significant.

Project Design Elements

No design elements are included in the Project with respect to land use.

Impact Analysis

Threshold 4.9-2: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction

Project construction activities would follow all applicable County Code requirements for construction on Sites 1 and 3, and City Code requirements for construction on Site 2, which would avoid conflicts with land use plans, policies, and regulations. Therefore, construction of the Project would not conflict with applicable land use plans, policies and regulations, and no impact would occur.

Operation

As previously discussed, development on Site 2 would be subject to City land use plans as well as the development regulations in the LAMC. Although Sites 1 and 3 are not governed by the City of Los Angeles General Plan and zoning regulations, an analysis of consistency with the City of Los Angeles General Plan
on Sites 1 and 3 is included for informational purposes. As required by CEQA, the Project’s consistency with the AQMP is addressed in Section 4.2 (Air Quality), with CalGreen regulations in Section 4.6 (Greenhouse Gas Emissions), and with the CMP is addressed in Section 4.14 (Traffic, Transportation and Parking) of this Draft EIR.

**2008 Regional Comprehensive Plan (Sites 1, 2 and 3)**

The Project (i.e., Sites 1, 2 and 3) would be consistent with the goals in the RCP, including goals related to land use, housing, and air quality. The Land Use and Housing Goals of the RCP support implementation of the Compass Blueprint Strategy. The policies include focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable, “people-scaled” communities, providing new housing opportunities, with building types and locations that respond to the region’s changing demographics, and targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations.

The Project would redevelop existing underused sites with new County office facilities at Site 1, residential and complimentary neighborhood serving commercial development at Site 2, and new senior affordable housing and a community recreation center at Site 3. This new development would occur in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. Sites 1 and 3 would involve all new construction. The Site 2 development would reuse the existing County office building by converting existing space to residential units, and would also provide new residential units. Residential units that would be provided by the Project would accommodate a variety of socioeconomic groups. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. Accordingly, the Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the 2008 RCP Goals.

**Southern California Compass Blueprint Growth Vision (Sites 1, 2 and 3)**

Table 4.9-1, Consistency with Compass Growth Vision Principles, addresses the four main principles of the Compass Growth Vision and their applicability to the Project.

**Table 4.9-1**

<table>
<thead>
<tr>
<th>Principle</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve Mobility For All Residents.</td>
<td>Consistent. The Project Sites are located within one-third mile (Site 3 is the farthest at 1,700 feet) of the Metro Rail Red/Purple line Wilshire/Vermont station. The Project Sites are also served by Metro buses that operate on Vermont Avenue and 6th Street. Furthermore, the Project would incorporate design elements, such as ground floor commercial space and restaurants along Vermont Avenue and 6th Street that would promote access by walking, bicycle or transit. Access and circulation improvements would accommodate traffic generated by the Project. The location of the parking and driveway entrances along Vermont Avenue and 6th Street, and the entrance to the parking garage on Shatto Place would allow continued...</td>
</tr>
</tbody>
</table>
Table 4.9-1  
*Consistency with Compass Growth Vision Principles*

<table>
<thead>
<tr>
<th>Principle</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>traffic flow along streets and driveways. In addition, the Project would provide efficient access to the surrounding street system, bikeways, sidewalks, and transit (e.g., Metro Red Line and bus lines), while minimizing traffic impacts on surrounding uses. Bicycle parking and storage would be provided within all three Project Sites. The Project would, therefore, be consistent with the Compass Growth Vision principle to improve mobility for all residents.</td>
<td></td>
</tr>
<tr>
<td>Foster Livability In All Communities.</td>
<td><strong>Consistent.</strong> This principle promotes infill development and redevelopment of underutilized sites to revitalize the existing community, promote future development of the area with a mix of uses, and promote a “people-scaled” pedestrian-friendly community. The Project would redevelop existing underused sites with new County office facilities to serve critical County functions, and new residential and complimentary commercial development in an urbanized area. The Project would reuse an existing County office building to provide residential units (Site 2), and provide new residential units, including deed-restricted senior affordable housing (Site 3), and a community recreation center (Site 3) to serve the existing community. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor neighborhood serving commercial uses and enhanced pedestrian facilities (sidewalks, landscaping) designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would contribute to ongoing efforts to bring investment and revitalization to the area. Residents and visitors would have access to the various uses in the immediate area within convenient walking distance. The Project would be consistent with the Compass Growth Vision principle to foster livability in all communities.</td>
</tr>
<tr>
<td>Enable Prosperity For All People.</td>
<td><strong>Consistent.</strong> This objective is primarily an economic objective, not directly related to environmental impacts. Nonetheless, the proposed office and commercial land uses, as well as Project construction, would provide a variety of jobs for critical County governmental functions, both existing and future high-wage and entry-level employment opportunities and career growth opportunities with potential benefits for the regional economy. The Project would provide employment opportunities and, thus, would be consistent with the Compass Growth Vision principle of enabling prosperity for all people.</td>
</tr>
<tr>
<td>Promote Sustainability For Future Generations.</td>
<td><strong>Consistent.</strong> The Project would be designed to incorporate building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled</td>
</tr>
</tbody>
</table>
Table 4.9-1  
Consistency with Compass Growth Vision Principles

<table>
<thead>
<tr>
<th>Principle</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>materials, and producing better indoor and outdoor environmental quality. The Project would meet the requirements in the County (Sites 1 and 3 development) and City (Site 2 development) Green Building Codes. Moreover, Sites 1 and 3 would be equivalent to LEED Silver status (under the U.S Green Building Council’s applicable rating system). In addition, the Project is located in the dense mid-Wilshire/Koreatown community, in a “Transit Priority Area” where bus and rail transit are readily available, which would reduce vehicle trips compared to a project not equally served by transit. Therefore, the Project would be consistent with the Compass Growth Vision principle to promote sustainability for future generations.</td>
</tr>
</tbody>
</table>

Source: Southern California Compass Growth Plan, June 2004; EcoTierra Consulting, 2017.

Overall, the Project (i.e., Sites 1, 2 and 3) would be consistent with the principles of the Compass Growth Vision.

Regional Transportation Plan/Sustainable Communities Strategy (Sites 1, 2 and 3)

The consistency of the Project with the RTP/SCS is addressed in Table 4.9-2, Project Consistency with the Applicable Goals of 2016-2040 RTP/SCS.

Table 4.9-2  
Project Consistency with the Applicable Goals of the 2016-2040 RTP/SCS

<table>
<thead>
<tr>
<th>Goal</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximize mobility and accessibility for all people and goods in the region.</td>
<td>Consistent. The Project would develop a mix of County office, residential (market rate and affordable) and neighborhood serving commercial uses in a Transit Priority Area and HQTA within walking distance of existing bus lines and transit stations, and provide bicycle parking and storage, which would maximize the potential for mobility and accessibility for people.</td>
</tr>
<tr>
<td>Protect the environment and health of our residents by improving air quality, and encouraging active transportation (non-motorized transportation, such as bicycling and walking.).</td>
<td>Consistent. The Project would incorporate a wide range of building technologies and design features that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing automobile trips and associated air emissions, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Moreover Sites 1 and 3 would achieve the equivalent of a LEED Silver status under the U.S Green Building Council’s applicable rating system. Pedestrian access to the Project Sites would be provided via the sidewalks along Vermont Avenue and 6th Street. The Project would provide opportunities for employees,</td>
</tr>
</tbody>
</table>
Table 4.9-2
Project Consistency with the Applicable Goals of the 2016-2040 RTP/SCS

<table>
<thead>
<tr>
<th>Goal</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>residents, and visitors to walk to other retail businesses within and near the Project Sites. In addition, the Project would provide long- and short-term bicycle parking spaces and storage. Therefore, the Project would encourage active transportation modes such as bicycling and walking.</td>
<td></td>
</tr>
<tr>
<td>Encourage land use and growth patterns that facilitate transit and active transportation.</td>
<td>Consistent. The Project would encourage land use and growth patterns that facilitate transit by being a compact, infill development in a Transit Priority Area and HQTA located near several public transit options, including the Vermont/Wilshire Metro Red Line Station and Metro bus lines which run along Vermont Avenue and 6th Street. In addition, the Project encourages active transportation by including bicycle parking stalls and storage on all three Project Sites. The Project also improves walkability in the immediate vicinity of the Project Sites by providing ground floor neighborhood serving commercial uses, a community recreation center for public use and enhanced pedestrian facilities (sidewalks, landscaping) designed to promote pedestrian access to the Project Sites and surrounding area.</td>
</tr>
</tbody>
</table>


Based on the above, the Project would be consistent with the applicable goals in the RTP/SCS.

The Project would also be consistent with the SCS Land Use Strategy of “Focusing New Growth Around Transit”. The Project would develop new County office, residential (market rate and affordable) and neighborhood serving commercial uses, and a community recreation center within one-third mile of the Metro Rail Red/Purple Line Wilshire/Vermont Station, within an identified Transit Priority Area and HQTA. The Strategy identifies that focusing future growth in HQTAs can provide expanded housing choices that nimbly respond to trends and market demands, encourage adaptive reuse of existing structures, and revitalize main streets. The Project would contribute to each of these objectives by providing deed-restricted senior affordable housing (Site 3), reusing the existing County office building to provide residential units (Site 2), and activating the street on Vermont Avenue and 6th Street. The Strategy also notes that additional local policies that ensure that development in HQTAs achieve the intended reductions in VMT and greenhouse gas emissions include: adaptive reuse of existing structures, and mixed-use development standards that include local serving retail, both of which are components of the Project. Overall, the Project (Sites 1, 2 and 3) includes numerous components that work to implement the Land Use Strategy of the SCS.

**County General Plan (Sites 1, 2 and 3 for informational purposes)**

While the land use plan contained in the General Plan focuses on unincorporated areas of the County and thus does not apply directly to the Project Sites, the General Plan contains a number of elements that address specific issues and establish various goals, policies, and objectives that pertain to the County as a whole and that are relevant to this County-sponsored project. These goals, policies, and objectives fall
into three basic categories, including (1) supporting infill and pedestrian-friendly development; (2) providing adequate public facilities; and (3) supporting development of affordable housing.

**Infill and Pedestrian Friendly Development**

The County General Plan Land Use Element includes the following goals and policies related to infill and pedestrian friendly development:

<table>
<thead>
<tr>
<th>Goal LU 4:</th>
<th>Infill development and redevelopment that strengthens and enhances communities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy LU 4.1</td>
<td>Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.</td>
</tr>
<tr>
<td>Policy LU 4.2</td>
<td>Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods.</td>
</tr>
<tr>
<td>Policy LU 4.3</td>
<td>Encourage transit-oriented development in urban and suburban areas with the appropriate residential density along transit corridors and within station areas.</td>
</tr>
<tr>
<td>Policy LU 4.4:</td>
<td>Encourage mixed use development along major commercial corridors in urban and suburban areas.</td>
</tr>
<tr>
<td>Goal LU 10</td>
<td>Well-designed and healthy places that support a diversity of built environments.</td>
</tr>
<tr>
<td>Policy LU 10.3</td>
<td>Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.</td>
</tr>
<tr>
<td>Policy LU 10.4</td>
<td>Promote environmentally-sensitive and sustainable design.</td>
</tr>
<tr>
<td>Policy LU 10.5</td>
<td>Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.</td>
</tr>
<tr>
<td>Policy LU 10.6</td>
<td>Encourage pedestrian activity through the following:</td>
</tr>
<tr>
<td></td>
<td>• Designing the main entrance of buildings to front the street;</td>
</tr>
<tr>
<td></td>
<td>• Incorporating landscaping features;</td>
</tr>
<tr>
<td></td>
<td>• Limiting masonry walls and parking lots along commercial corridors and other public spaces;</td>
</tr>
<tr>
<td></td>
<td>• Incorporating street furniture, signage, and public events and activities; and</td>
</tr>
<tr>
<td></td>
<td>• Using wayfinding strategies to highlight community points of interest.</td>
</tr>
<tr>
<td>Policy LU 10.7</td>
<td>Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.</td>
</tr>
<tr>
<td>Policy LU 10.9</td>
<td>Encourage land uses and design that stimulate positive and productive human relations and foster the achievement of community goals.</td>
</tr>
<tr>
<td>Policy LU 10.10</td>
<td>Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.</td>
</tr>
</tbody>
</table>

The Project would redevelop existing underused sites with new County office facilities, and new residential and complimentary mixed-use commercial development in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station, and along the major commercial corridors of Vermont Avenue and 6th Street. The Project would reuse an existing County office building to provide residential units and would provide new residential units (both at Site 2), including deed-restricted senior affordable housing, and a community recreation center to serve the existing community (at Site 3). The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as enhanced pedestrian facilities, through repair
of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would include a public plaza on Site 1 to serve employees and visitors to the new County office building, and a new community recreation center at Site 3 to serve the residents of the area. The Project would include architecturally distinctive buildings that would contribute to an enhanced aesthetic environment, and would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. The Project would meet the requirements in the County Green Building Standards Code (Sites 1 and 3) and City Green Building Code (Site 2). Further, Sites 1 and 3 would achieve the equivalency of LEED Silver as determined by the US Green Building Council’s applicable rating system(s). In addition, the Project is located in the dense mid-Wilshire/Koreatown community in an identified Transit Priority Area and HQTA, where bus and rail transit are readily available, which would reduce vehicle trips and commute times compared to a project not similarly served by transit. The Project would be consistent with the policies of the County General Plan with respect to infill and pedestrian friendly development.

Public Facilities

The County General Plan Public Services and Facilities Element includes the following goals and policies related to public facilities:

<table>
<thead>
<tr>
<th>Goal/Policy</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PS/F 1</td>
<td>A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.</td>
</tr>
<tr>
<td>PS/F 1.7</td>
<td>Consider resource preservation in the planning of public facilities.</td>
</tr>
<tr>
<td>PS/F 1.3</td>
<td>Ensure coordinated service provision through collaboration between County departments and service providers.</td>
</tr>
</tbody>
</table>

Although the policies listed above are not designed to address or reduce environmental impacts, as a County-sponsored Project designed to improve the delivery of services to County residents, the policies of the General Plan Public Services and Facilities Element are relevant to the Project. The Project would include new facilities for the Department of Mental Health and WDACS on Site 1 that would allow for more efficient and effective delivery of services to County residents and implement the facilities plans of the County, and a new community recreation center on Site 3 to serve the residents of the area. The new County office building would be designed with sustainable features (LEED Silver equivalent) and located in an identified Transit Priority Area and HQTA well served by transit in order to reduce energy and water consumption, automobile trips and associated air emissions. The Project would be consistent with the policies of the County General Plan with respect to public facilities.

Affordable Housing

The County General Plan Housing Element includes the following goals and policies related to affordable housing:
Goal 1 A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly for persons with special needs, including but not limited to low income households, seniors, persons with disabilities, large households, single-parent households, the homeless and at risk of homelessness, and farmworkers.

Policy 1.3 Coordinate with the private sector in the development of housing for low and moderate income households and those with special needs. Where appropriate, promote such development through incentives.

Policy 1.4 Assist housing developers to identify and consolidate suitable sites for developing housing for low and moderate income households and those with special needs.

Policy 2.1 Support the development of housing for low and moderate income households and those with special needs near employment and transit.

Policy 8.1 Support the distribution of affordable housing, shelters, and transitional housing in geographically diverse locations throughout the unincorporated areas, where appropriate support services and facilities are available in close proximity.

Policy 8.4 Encourage housing design to accommodate special needs. Designs may include: units with multiple bedrooms; shared facilities; universal design; onsite child care; health clinics; or onsite job training services.

Policy 9.1 Ensure collaboration among County departments and other agencies in the delivery of housing and related services.

Although the policies listed above are not designed to address or reduce environmental impacts, as a County-sponsored Project designed to use County property to increase the supply of affordable housing for County residents, the policies of the General Plan Housing Element with respect to the provision of affordable housing are relevant to the Project. The Project would include deed-restricted senior affordable housing units on Site 3 within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. The County would provide the land for the affordable housing units on Site 3, which would facilitate this development. The Project does not involve the displacement of any housing units, and in fact, creates new housing in the area. The Project would be consistent with the policies of the County General Plan with respect to affordable housing.

City of Los Angeles General Plan Framework Element (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City General Plan Framework promotes the development of a diversity of uses to serve existing and future residents, businesses and visitors in the areas of the City that are most capable of accommodating growth. By concentrating future growth in these areas, the City Framework promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. The City Framework also promotes the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, and encourages the location of new commercial and multi-family housing development to occur in proximity to transit stations.

Accommodation of Growth and Development (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City Framework includes the following objectives and policies related to growth and development:

| Objective 3.1 | Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors. |
Policy 3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.

Policy 3.1.4 Accommodate new development in accordance with land use and density provisions of the General Plan Framework Element Long-Range Land Use Diagram.

Objective 3.2 To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

Policy 3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

Objective 3.4 Encourage new multi-family residential, retail commercial, and office development in the City’s neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

Objective 3.7 Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents’ quality of life can be maintained or improved.

Policy 3.7.4 Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.

Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 (Land Use Standards and Typical Development Characteristics) and 3-6 (Land Use Designation and Corresponding Zones). Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.

Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies, and provide adequate transitions with adjacent residential uses at the edges of the centers.

Objective 4.2 Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

The Project Sites are included in an area identified as a Regional Center on the City Framework’s Long-Range Land Use Diagram (Metro). Development of County office, residential and commercial land uses would serve the needs of existing and future residents in the area and would expand the diversity of uses in this Regional Center. The Project would increase the vitality in the area through maximizing development of underutilized sites with new land uses that would provide housing and job opportunities. The concentration of development would support the Project area’s existing range of services and
activities and would be consistent with the Regional Center designation. The Regional Center is an area targeted for high-density, and a focal point of regional commerce, identity, and activity. Encouraged uses include corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. The Project would provide pedestrian-oriented development in proximity to transit to encourage the development of an activity center in the area of the Project Sites. The Project would provide opportunities for residents, employees, and visitors to use public transit, and walk to other retail businesses and commercial land uses within and near the Project Site. As such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution. The Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the policies of the City of Los Angeles General Plan Framework regarding location and accommodation of growth and development in the City.

**Urban Form and Neighborhood Design (Sites 1 and 3 for informational purposes; applicable to Site 2)**

The City Framework includes the following objectives and policies related to urban form and neighborhood design:

<table>
<thead>
<tr>
<th>Goal 5A</th>
<th>A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective 5.2</td>
<td>Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.</td>
</tr>
<tr>
<td>Policy 5.2.2</td>
<td>Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.</td>
</tr>
<tr>
<td>Objective 5.8</td>
<td>Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.</td>
</tr>
</tbody>
</table>
| Policy 5.8.1 | Buildings in pedestrian-oriented districts and centers should have the following general characteristics:  
  - An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk;  
  - A building wall more-or-less continuous along the street frontage;  
  - Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases;  
  - Shops with entrances directly accessible from the sidewalk and located at frequent intervals;  
  - Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate;  
  - Ground floor building walls devoted to display windows or display cases;  
  - Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible;  
  - Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and |
The Project would include County office, residential and neighborhood serving commercial land uses. The Project design would incorporate design elements, such as ground floor commercial spaces along Vermont Avenue and 6th Street. By developing a mix of land uses on the Project Site, the Project would generate economic activity in the area and could help attract future investment to the area. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as an enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would include many of the specific design characteristics listed in Policy 5.8.1, including ground floor building frontage designed to accommodate active, pedestrian friendly neighborhood serving commercial uses, community facilities, or display cases, shops with entrances directly accessible from the sidewalk and located at frequent intervals, well-lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, ground floor building walls devoted to display windows or display cases, parking located behind the commercial frontage, and inclusion of bicycle parking and storage areas and facilities to reduce the need for vehicular use. The Project (Sites 1, 2 and 3 collectively) would be consistent with the policies of the City Framework regarding urban form and neighborhood design. Therefore, the Project would be consistent with the applicable goals, objectives, and policies in the City General Plan Framework Element.

City of Los Angeles General Plan Housing Element (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City’s Housing Element provides objectives and policies designed to promote development of the City’s housing supply and affordability.

<table>
<thead>
<tr>
<th>Objective 1.1</th>
<th>Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 1.1.3</td>
<td>Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city’s households.</td>
</tr>
<tr>
<td>Policy 1.1.4</td>
<td>Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.</td>
</tr>
<tr>
<td>Policy 1.1.7</td>
<td>Strengthen the capacity of the development community to develop affordable housing.</td>
</tr>
<tr>
<td>Objective 2.2</td>
<td>Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.</td>
</tr>
<tr>
<td>Policy 2.2.5</td>
<td>Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.</td>
</tr>
<tr>
<td>Objective 2.3</td>
<td>Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.</td>
</tr>
<tr>
<td>Policy 2.3.2</td>
<td>Promote and facilitate reduction of water consumption in new and existing housing.</td>
</tr>
<tr>
<td>Policy 2.3.3</td>
<td>Promote and facilitate reduction of energy consumption in new and existing housing.</td>
</tr>
</tbody>
</table>
Policy 2.3.4  Promote and facilitate reduction of waste in construction and building operations.

Objective 2.4  Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.

Although the policies listed above are not designed to address or reduce environmental impacts, the Project would provide housing, and the policies of the General Plan Housing Element with respect to the provision of housing supply and affordable housing are relevant to the Project. The Project includes the development of new market rate (Site 2) and deed-restricted affordable housing units (Site 3) that will increase the City’s housing supply for all income levels. The County will provide the land for the affordable housing project on Site 3, which will facilitate this development by a non-profit affordable housing provider. Site 2 would provide market rate units with a range of unit types by adaptively reusing an existing office building and through new construction. The new units at Sites 2 and 3 would be located near bus and rail transit lines and would incorporate sustainability features that would reduce energy and water consumption and promote recycling and waste reduction. Site 3 would be developed to LEED Silver standards. The Project would not remove any existing residences or displace any residential tenants. The proposed commercial land uses would provide amenities that would serve the Project’s future residents and visitors, as well as the existing neighborhood residents, workers, and visitors. Therefore, the Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the applicable objectives and policies in the City’s Housing Element.

**Wilshire Community Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)**

The Wilshire Community Plan provides objectives and policies designed to promote planned development of the Community Plan area.

<table>
<thead>
<tr>
<th>Goal 1</th>
<th>Provide a safe, secure, high quality residential environment for all economic, age and ethnic segments of the Wilshire Community;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective 1-1</td>
<td>Provide for the preservation of existing quality housing and for the development of new housing to meet the diverse economic and physical needs of existing residents and expected new residents in the Wilshire Community Plan Area;</td>
</tr>
<tr>
<td>Policy 1-1.3</td>
<td>Provide for adequate Multiple Family residential development;</td>
</tr>
<tr>
<td>Objective 1-2</td>
<td>Reduce vehicular trips by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus stops;</td>
</tr>
<tr>
<td>Policy 1-2.1</td>
<td>Encourage higher density residential uses near major public transportation centers;</td>
</tr>
<tr>
<td>Objective 1-3</td>
<td>Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods;</td>
</tr>
<tr>
<td>Policy 1-4.1</td>
<td>Promote greater individual choice in type, quality, price and location of housing;</td>
</tr>
<tr>
<td>Policy 1-4.3</td>
<td>Encourage multiple family residential and mixed use development in commercial zones;</td>
</tr>
<tr>
<td>Policy 11-1.4</td>
<td>Support the provision of bicycle parking facilities in all new development;</td>
</tr>
<tr>
<td>Objective 11-2</td>
<td>Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers;</td>
</tr>
</tbody>
</table>
Goal 2

Encourage strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire community through well-designed, safe and accessible areas, while preserving historic and cultural character;

Policy 2-1.1

New commercial uses should be located in existing established commercial areas or shopping centers.

Objective 2-3

Enhance the visual appearance and appeal of commercial districts.

The Project would redevelop existing underused sites with new County office facilities, and new residential and complementary commercial development in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. The Project would reuse the existing County office building to provide residential units and provide new residential units in a commercial zone (Site 2), and deed-restricted senior affordable housing, and a community recreation center to serve the existing community (Site 3). The Project would provide appropriate density in an area that is well-served by rail and bus transit in an identified Transit Priority Area and HQTA. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses on established commercial corridors as well as enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would also include bicycle parking spaces on all three Project Sites to encourage the use of alternate transportation modes.

The range of commercial and residential Project uses would be consistent with the Community Commercial land use designation of the Project Sites. The Wilshire Community Plan land use map includes a footnote restricting development within the “Community Commercial” land use designation to Height District 1 (i.e., Footnote #5). Height District 1 generally permits a floor area ratio of 1.5 to 1 with unlimited height (i.e., the development envelope is only restricted by the floor area limitation). Thus, the developments at Sites 1 and 2 (new construction/floor area only)\(^{13}\) would exceed the floor area and intensity contemplated by the Wilshire Community Plan land use map.\(^{14}\) However, as noted above, the City Framework Element of the General Plan identifies the Project Sites as within a “Regional Center” designation where the highest intensity developments are encouraged (e.g., high rise construction up to a 6:1 floor area ratio). Moreover, the Project would advance multiple Community Plan goals, policies and objectives, including encouraging a strong and competitive commercial sector along the Vermont Corridor (Site 1) and providing market rate and affordable housing in close proximity to transit (Sites 2 and 3).

\(^{13}\) The Adaptive Re-Use Incentives Area Specific Plan permits adaptive reuse of the existing office building for residential use. Therefore, adaptive re-use of the existing building as a stand-alone project (i.e., without any new floor area) would supersede the Wilshire Community Plan footnote #5 FAR limitation. However, the Site 2 new proposed construction is not authorized by the Adaptive Reuse Specific Plan and would therefore exceed the 1.5 to 1 FAR limit imposed by the Wilshire Community Plan land use footnote #5.

\(^{14}\) Site 3 is also limited to 1.5 to 1 FAR by the Wilshire Community Plan Land Use Map (i.e., Footnote #5). However, as a 100 percent affordable housing project the Site 3 development could exceed this floor area limitation through development incentives and/or waivers permitted by the State Density Bonus Law (California Government Code Section 65915) and the City of Los Angeles’ Density Bonus Ordinance (LAMC Section 12.22A.25). Thus, if Site 3 were governed by the Wilshire Community Plan, the 1.5 to 1 development limitation imposed by Land Use Map Footnote #5 would be superseded by State law.
The developments at the Project Sites would also increase the vitality in the area through maximizing development of underutilized sites with new land uses that would provide housing and job opportunities. Notwithstanding that Site 1 and 2 conflict with Wilshire Community Plan Land Use Map Footnote #5 (as noted above), the Project as a whole would reinforce the existing character of the surrounding areas on Vermont Avenue and Wilshire Boulevard. The concentration of development would support the Community Plan area’s existing range of services and activities.

The developments at Sites 1, 2 and 3 would be compatible with the existing commercial and multi-family land uses in the area. Project buildout would be of a scale and built form consistent with the surrounding area, which includes medium and high rise buildings, particularly in the area of the Metro Rail station and on Wilshire Boulevard (see Section 4.1, Aesthetics, of this Draft EIR), and would serve the housing needs of existing and possible future residents, and the needs of employees, visitors, and patrons within Wilshire Community Plan Area. Thus, notwithstanding that Site 1 and 2 conflict with Wilshire Community Plan Land Use Map Footnote #5, the Project (i.e., Sites 1, 2 and 3) would on balance be consistent with the land use goals of the Wilshire Community Plan that are applicable to the Project Sites and surrounding area.

**Plan For A Healthy Los Angeles (Sites 1 and 3 for informational purposes; applicable to Site 2).**

The Healthy LA Plan provides objectives and policies designed to promote the health of the City’s residents through design.

<table>
<thead>
<tr>
<th>Policy</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.2</td>
<td>Healthy Building Design and Construction: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools practices, and programs.</td>
</tr>
<tr>
<td>2.6</td>
<td>Repurpose Underutilized Spaces for Health: Work proactively with residents to identify and remove barriers to leverage and repurpose vacant and underutilized spaces as a strategy to improve community health.</td>
</tr>
<tr>
<td>5.1</td>
<td>Air Pollution and Respiratory Health: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.</td>
</tr>
<tr>
<td>5.7</td>
<td>Land Use Planning For Public Health and GHG Emission Reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.</td>
</tr>
</tbody>
</table>

The Project would promote a healthy built environment that could reduce automobile trips and associated air and GHG emissions by providing an enhanced pedestrian-oriented design of the Project Sites that would promote alternate means of access to the Project. The Project would improve pedestrian facilities in the area to promote walking and would provide bicycle parking and storage spaces on all three Project Sites to promote bicycle use. The Project is located in an area with various bicycle facilities, including on-street bicycle lanes on 1st Street, 7th Street, 11th Street, and Oxford Avenue, and sharrows (shared lanes between bicycles and vehicles on 4th Street and New Hampshire Avenue), further increasing the likelihood of bicycle use. The Project would convert underutilized sites into County office, residential, commercial and community recreation center uses that would enhance the built environment in the surrounding...
Project vicinity and promote interaction with surrounding uses through walking and bicycling. The Project Sites are located in an area that is well-served by rail and bus transit, which would help to reduce automobile trips and associated air emissions, and improve air quality. In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of building technologies and design features that would protect the environment by saving energy (which would also reduce air pollutant and GHG emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Further, the Project Sites would achieve the equivalent of LEED Silver status. Therefore, the Project would be consistent with the applicable policies in the Healthy LA Plan.

**Wilshire Center/Koreatown Redevelopment Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)**

The Project would provide County office, multifamily residential and commercial uses on Sites 1 and 2, which would be consistent with the Community Commercial land use designation for these sites set forth in the Redevelopment Plan. The Project would provide deed-restricted affordable housing units and a community recreation center on Site 3, which would be consistent with the Community Commercial land use designation set forth in the Redevelopment Plan for Site 3.

**Adaptive Reuse Incentive Areas Specific Plan (Site 2 only)**

The Adaptive Reuse Incentive Areas Specific Plan (“Specific Plan”) provides that the following provisions shall apply to the adaptive reuse of buildings constructed prior to July 1, 1974, or historically significant buildings:

1. **Floor Area.** Existing floor area exceeding that permitted by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

2. **Height.** Existing height exceeding that permitted by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

3. **Yards.** Existing observed yards not meeting the yards required by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

Because the existing County office building on Site 2 was constructed in 1964, these provisions would apply to the proposed reuse of this building. Adaptive Reuse Projects must be approved by a City Zoning Administrator. With this approval, the proposed reuse of the existing County office building for residential units would be consistent with the Specific Plan.

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15 Section 503 of the Redevelopment Plan defers to land uses permitted by the City of Los Angeles land use designation and regulations. Further, the Successor Agency to the City of Los Angeles Community Redevelopment Agency adopted a resolution on June 21, 2012 clarifying that permitted land uses under the Wilshire Center/Koreatown Redevelopment Plan are governed by the Los Angeles General Plan, Community Plan and the Zoning Ordinance. Thus, as the Project’s commercial, residential and public benefit uses are permitted by the Project sites’ Community Plan “Community Commercial” land use designation and C2-1 zoning, the uses are also permitted under the Redevelopment Plan.
City of Los Angeles Planning and Zoning Code (Site 2 only)

Permitted Uses

Site 2 is zoned C2-1. The proposed land uses that are proposed for the remainder of Site 2 (multifamily residential over a parking structure with ground floor commercial) are permitted in the C2 zone.

Height District

The zoning classification for Site 2 limits FAR to 1.5 to 1 with unlimited height. While this limitation would not apply to the reuse of the existing County office building, as discussed above pursuant to the Adaptive Reuse Incentives Area Specific Plan, the proposed new construction would exceed the permitted floor area allowed under the C2-1 zone/height district. Thus, a discretionary land use entitlement such as a General Plan Amendment to “Regional Center Commercial” and a Height District Change to Height District 2 (i.e., from C2-1 to C2-2) would be required to accommodate an FAR up to 6:1. With a City discretionary land use approval, the proposed new residential construction would be consistent with the Planning and Zoning Code.

Site 2 is located in the urbanized mid-Wilshire/Koreatown community of the City, within walking distance of regionally serving transit service. The Project’s bulk and massing is consistent with multiple high-rise commercial and mixed-use developments located along Vermont Avenue. Densification of this area has long been planned for and encouraged given its close proximity to public transit and major employers, and the Project would fit within the existing neighborhood context and pattern of development along Vermont Avenue and 6th Street. In addition, the proposed parking structure and residential building would be located immediately adjacent to the existing County office building, which is approximately 173 feet in height. A discretionary approval to authorize the Site 2 new construction would replace an underutilized property with a new, mixed use building that would contribute to the revitalization of this area of Vermont Avenue and 6th Street. Thus, the height district change for Site 2 would further realize the City’s goal and policies for the Wilshire Community Plan area, including encouraging higher density residential uses near major public transportation centers, and encouraging multiple family residential and mixed use development in commercial zones.

Parking Requirements

New development on Site 2 would provide parking meeting the requirements of the Planning and Zoning Code. The LAMC requires 1 parking space per studio unit, 1.5 spaces per 1-bedroom unit, and 2 parking spaces per 2-bedroom unit. The 3,400 square feet of ground-floor commercial space must provide 1 space per 500 square feet under the City’s Enterprise Zone parking requirements. Accordingly, the new mixed-use building would require a total of 108 parking spaces (101 residential plus 7 commercial parking spaces). In total, Site 2 would be required to provide a total of 161 parking spaces under the combination of Specific Plan and LAMC requirements (53 Specific Plan spaces plus 108 spaces for new mixed use construction). Because the Project proposes 263 spaces at Site 2, the Project would satisfy resident and visitor parking needs. The provision of parking supply is discussed in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

City of Los Angeles Walkability Checklist (Site 2 only)

While the guidance provided by the Walkability Checklist is not mandatory and is not a part of the LAMC, incorporating the criteria listed to the maximum extent feasible would create a more walkable
environment and a higher quality of urban form for the Project. The essential purpose of the Walkability Checklist is to guide Department of City Planning staff in working with developers to make developments more “walkable” by way of enhancing pedestrian activity, access, comfort, and safety. In addition, the Walkability Checklist encourages planners and developers to protect neighborhood character and pursue high-quality urban form. The following is an analysis of Site 2 development and its consistency with the applicable guidelines.

**Sidewalks**

Site 2 development generally supports the walkability guidelines discussing sidewalks, which describes that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. Pedestrian access on Site 2 would be provided via sidewalks along 6th Street and Vermont Avenue that would provide direct access to ground floor commercial uses. Therefore, the Project would be consistent with Walkability Checklist guidelines related to sidewalks.

**Utilities**

Site 2 development generally supports the walkability guidelines regarding utilities, which describe that ideally utilities should be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path. The Project would place all utility equipment within and around the perimeter of the Site 2 underground and/or in the specified zones outlined in the Walkability Checklist.

Per LADWP standards, the proposed domestic water lines would have the meter installed in an underground vault in the sidewalk, and the fire water lines would have the detector check installed in an underground vault in the sidewalk. The backflow preventers for the water lines would be private and would be located on private property, either within the building or along the site perimeter, maintaining 12 feet of clearance. Equipment would be buffered with landscaping, if outside the building.

Site 2 would connect to the existing sewer lines located underground within the public right-of-way on Vermont Avenue and 6th Gower Street. Storm drains would either discharge through the curb face via a parkway drain, located underneath the sidewalk, or be hard-piped to a catch basin, which would be also located underneath the public sidewalk. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to utilities.

**Building Orientation**

Site 2 development supports the walkability guidelines regarding building orientation, which describe that a building’s placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. Site 2 development would provide direct access to commercial uses on Vermont Avenue and 6th Street. Direct access to the residential buildings would be provided from the Vermont Avenue and 6th Street sidewalks. Furthermore, ground floor commercial uses would support outdoor dining. Therefore, Site 2 development would be would be consistent with Walkability Checklist guidelines related to building orientation.
**Off-Street Parking and Driveways**

Site 2 development supports the walkability guidelines regarding off-street parking and driveways, which states that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. Vehicular access to Site 2 would be provided via a new driveway entrance off of 6th Street that leads to the parking structure and loading areas. Vehicle entries and exits would be clearly marked to indicate a clear vehicular circulation path, separate from the pedestrian pathways.

Bicycle parking would be provided in accordance with the Bicycle Parking Ordinance (LAMC 12.21-A,16). A total of 290 bicycle parking spaces would be provided on Site 2 (see Table 3-2 in Section 3.0, Project Description and Environmental Setting). Long-term bicycle parking and storage spaces would be configured to protect bicycles from inclement weather and would consist either of bicycle lockers, bicycle rooms or cages, or attended facilities. While the exact location of the bicycle storage is subject to change, all bicycle parking would be provided either at grade level or one level below ground in the garage.

Furthermore, pedestrian walkways from the parking structure and to the building entrances would be identifiable with the use of lighting and signage. The width of driveways would meet and not exceed the standard width identified as necessary to accommodate vehicles and all parking areas would be illuminated with adequate, uniform, and glare-free lighting. Lighting on Site 2 would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to off-street parking and driveways.

**On-Site Landscaping**

Site 2 development would be designed to generally support the walkability guidelines regarding on-site landscaping. Each street would include landscaping intended to create a pedestrian friendly environment and a pleasing transition from the street to the building. Site 2 development would improve the pedestrian environment in the area of the Project Sites by providing enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, which is designed to promote pedestrian access to the Project Sites and surrounding areas. Landscaping would be provided at the ground floor on Site 2, including at the entrances to the commercial and residential components of the building, and along the sidewalk. Landscaping would consist of a variety of trees, shrubs, and ground coverings. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to on-site landscaping.

**Building Façade**

Site 2 development generally supports the walkability guidelines regarding building façade, which describe that a building’s façade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. Site 2 development is a proposed mixed use development that would be contained in the reused County office building and a new building, both of which are designed to be welcoming to pedestrians through provision of an active and engaging streetscape, and landscaped entrances to the Project’s residential lobbies, thereby fostering a quality urban environment. Site 2 development would promote the public convenience and welfare by enhancing pedestrian activity through these building design and streetscape enhancements. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to building frontage.
Building Signage and Lighting

Site 2 development would be designed to generally support the walkability guidelines regarding building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and “place making”. Pedestrian wayfinding signage would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors, while Site 2 lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes.

Site 2 lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

Therefore, Site 2 development would be consistent with Walkability Checklist guidelines related to building signage and lighting.

Conclusion

Overall, the Project would have a less-than-significant impact with respect to consistency with applicable land use plans, policies, and regulations and it would be generally compatible with surrounding land uses.

CUMULATIVE IMPACTS

The study area for the land use cumulative impacts analysis includes the Project Sites and the Wilshire Community Plan area. The related projects are located in the Wilshire Community Plan Area and would be expected to promote the goals and policies related to future development within the Community Plan Area as well as state and regional policies that promote the concentration of new development in areas well served by public transportation. The Project (Sites 1, 2 and 3) would not result in any significant impacts related to consistency with land use plans. As discussed above, the Project would be consistent with all applicable land use regulations and policies and it would be generally compatible with surrounding land uses. The less-than-significant land use impacts associated with the Project Sites discussed above would not result in any cumulatively considerable impacts related to land use.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

No Project Design Features or Regulatory Requirements (other than those discussed in the preceding sections) are applicable to the Project with regard to land use.

MITIGATION MEASURES

The Project would not result in a significant land use and planning impact. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to land use as a result of the Project would be less than significant.