

IV. Environmental Impact Analysis

G. Land Use

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to land use. Specifically, this section analyzes the Project's consistency with relevant land use plans, policies, and regulations and evaluates the relationship of the Project with surrounding land uses.

2. Environmental Setting

a. Regulatory Framework

(1) Local

At the local level, several plans, policies, and regulatory documents guide development within the City of Los Angeles, including the City of Los Angeles General Plan (General Plan), and the City of Los Angeles Municipal Code (LAMC), which governs land use through specific land use restrictions, design standards, and building and safety codes. The Palms–Mar Vista–Del Rey Community Plan (Community Plan) constitutes the local land use policy standard for the Project Site and Community Plan area. The Project Site is also located within the City of Los Angeles Coastal Transportation Corridor Specific Plan (Specific Plan). Applicable plans and associated regulatory documents and requirements are described below.

(a) City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a General Plan. The City of Los Angeles General Plan, originally adopted in 1974, is a comprehensive long-term document that provides principles, policies, and objectives to guide future development and to meet the existing and future needs of the City. The General Plan consists of a series of documents which includes the seven elements mandated by the State of California: Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Infrastructure Systems, Public Facilities and Services, Health and Wellness, as well as the Citywide General Plan Framework Element (Framework Element). The General Plan's Land Use Element comprises 35 local area plans known as Community Plans that

guide land use at the local level. As discussed above, the Project Site is located within the boundaries of the Palms–Mar Vista–Del Rey Community Plan.

(i) City of Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides primary objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts, and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories that are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards. However, these land use categories do not connote land use entitlements or affect existing zoning for properties in the City and are intended to serve as guidelines for the Community Plans.¹ The Project Site is not located within the boundaries of any of these land use categories.²

Housing Chapter

The Housing Chapter of the Framework Element presents an overview of the critical issues related to housing in Los Angeles, provides goals to guide future action, and sets forth policies to address housing issues. The Housing Chapter's overarching goal is to define the distribution of housing opportunities by type and cost for all residents of the City. The Housing Chapter provides policies to achieve this goal through a number of measures:

¹ *As indicated in Chapter 1 of the General Plan Framework, the General Plan Framework neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and Community Plans. The General Plan Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans*

² *General Plan Framework Element, Figure 3-3, Long Range Land Use Diagram—West/Coastal Los Angeles.*

- Concentrating opportunities for new development in the City's Neighborhood Districts and in Community Centers, Regional Centers, and the Downtown Center, as well as along primary transit corridors/boulevards;
- Providing development opportunities along boulevards located near existing or planned major transit facilities and areas characterized by low-intensity or marginally viable commercial uses with structures that integrate commercial, housing, and/or public service uses; and
- Focusing mixed uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter establishes the goal of creating a livable City for existing and future residents that is attractive to future investment, and a City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales. Within this chapter, "urban form" is defined as the general pattern of building height and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, open space, public facilities, as well as activity centers and focal elements. "Neighborhood design" is defined as the physical character of neighborhoods and communities within the City. The Framework Element does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the Community Plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City's residents, and guide amendments to the General Plan Open Space Element and Conservation Element. The Open Space and Conservation Chapter also includes policies to resolve the City's open space issues. Specifically, the Open Space and Conservation Chapter contains open spaces goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

Economic Development Chapter

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

Transportation Chapter

The goals of the Transportation Chapter of the General Plan Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. As discussed in the Transportation Chapter of the General Plan Framework Element, the goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 in August 2015. Mobility Plan 2035 was readopted in January 2016 and again in September 2016.³ With the updated Transportation Element, the Transportation Chapter of the General Plan Framework Element is now implemented through Mobility Plan 2035. Refer to Subsection 2.a.(1)(a)(iii), Mobility Plan 2035, below, for a discussion of the Mobility Plan 2035.

Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems (many of which are interrelated), including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for

³ *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.*

the maintenance and/or restoration of service after emergencies, including earthquakes. The Project's consistency with applicable goals, objectives, and policies in the Framework Element is analyzed in Table IV.G-1 on page IV.G-25 and the corresponding discussion in the impact analysis below.

(ii) Los Angeles General Plan Housing Element

Adopted in December 2013, the Housing Element 2013–2021 of the City's General Plan identifies four primary goals and associated objectives, policies, and programs. The goals are as follows:

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

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is analyzed in Table IV.G-2 on page IV.G-39 in the impact analysis below.

(iii) Mobility Plan 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element, Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:⁴

⁴ City of Los Angeles Department of City Planning, *Mobility Plan 2035: An element of the General Plan*, last adopted by City Council on September 7, 2016.

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in Mobility Plan 2035 is analyzed in Table IV.G-1 on page IV.G-25 in the impact analysis below.

(iv) Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles is the Health and Wellness Element of the General Plan. Adopted in March 2015, the Plan for a Healthy Los Angeles 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. The Plan for a Healthy Los Angeles accomplishes two policy objectives: (1) elevates existing health-oriented policies in the General Plan; and, where policy gaps exist, (2) creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan for a Healthy Los Angeles identifies seven primary goals and identifies new policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. The goals include the following:

- Los Angeles, a Leader in Health and Equity: Recognize the complexity of the issues behind poor health outcomes and the multidisciplinary and collaborative approach needed to uproot health disparities;
- A City Built for Health: Use design, construction, and public services to promote the physical, mental, and social well-being of its residents and make it easier for people to shop, buy fresh produce, visit a doctor, have meaningful social interactions, breathe cleaner air, and live and age in their community, across income levels and physical abilities;
- Bountiful Parks and Open Spaces: Support opportunities for physical activity, offer safe havens for families and children, provide spaces for social interaction, provide access to nature, and offer mental respite;
- Food that Nourishes the Body, Soul, and Environment: Include food resources that make the healthiest choice the easiest choice in all neighborhoods, while also supporting sustainable food growing and distribution within and beyond the

City's jurisdiction to encourage healthy living and create a resilient, healthy and equitable food system;

- **An Environment Where Life Thrives:** Provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins;
- **Lifelong Opportunities for Learning and Prosperity:** Focus on improving educational attainment, enhancing opportunities for learning at all stages of life, and workforce development, with the goal of enhancing opportunities for economic prosperity; and
- **Safe and Just Neighborhoods:** Create safe communities through community-based public safety initiatives and increase access to gang prevention resources, which includes access to economic and educational opportunities and collaborative relationships with public safety officials.

Although most of these goals apply at a regional- or citywide-level, the Project's consistency with applicable policies in the Plan for a Healthy Los Angeles is analyzed in the impact analysis in Subsection 3.d.(3)(a)(iv) below.

(v) Palms–Mar Vista–Del Rey Community Plan

The Palms–Mar Vista–Del Rey Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the Framework Element. Adopted on November 20, 1985 and updated in 1997, the specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Palms–Mar Vista–Del Rey community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

As shown in Figure IV.G-1 on page IV.G-8, the Community Plan's land use designation for the Project Site is Limited Manufacturing. The Project's consistency with applicable land use policies in the Community Plan is analyzed in Table IV.G-3 on page IV.G-44 in the impact analysis below. The Project's consistency with applicable design standards in the Community Plan's Urban Design Chapter is addressed in Section IV.A, Aesthetics, of this Draft EIR.

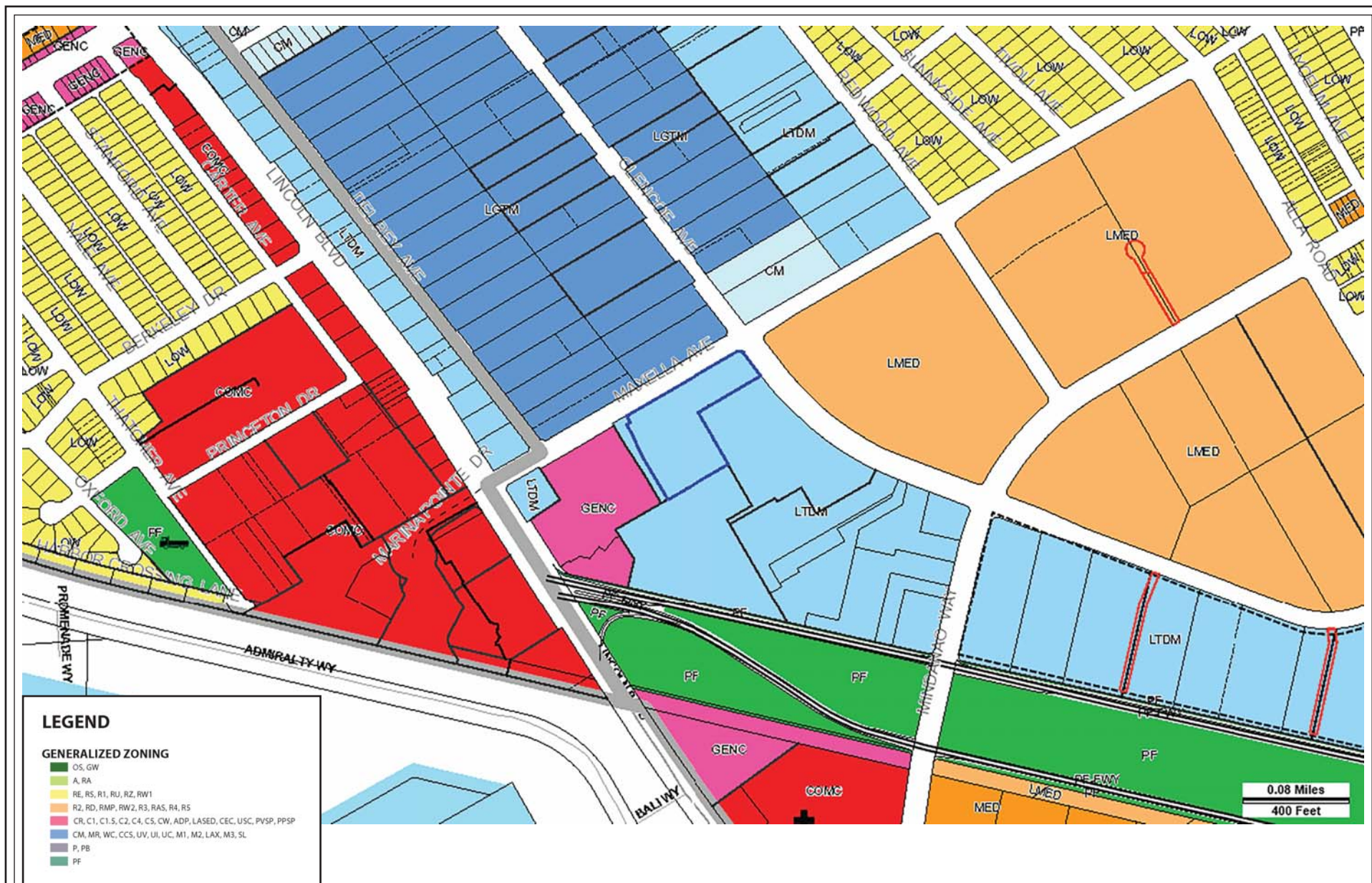


Figure IV.G-1
Land Use Designations on the Project Site

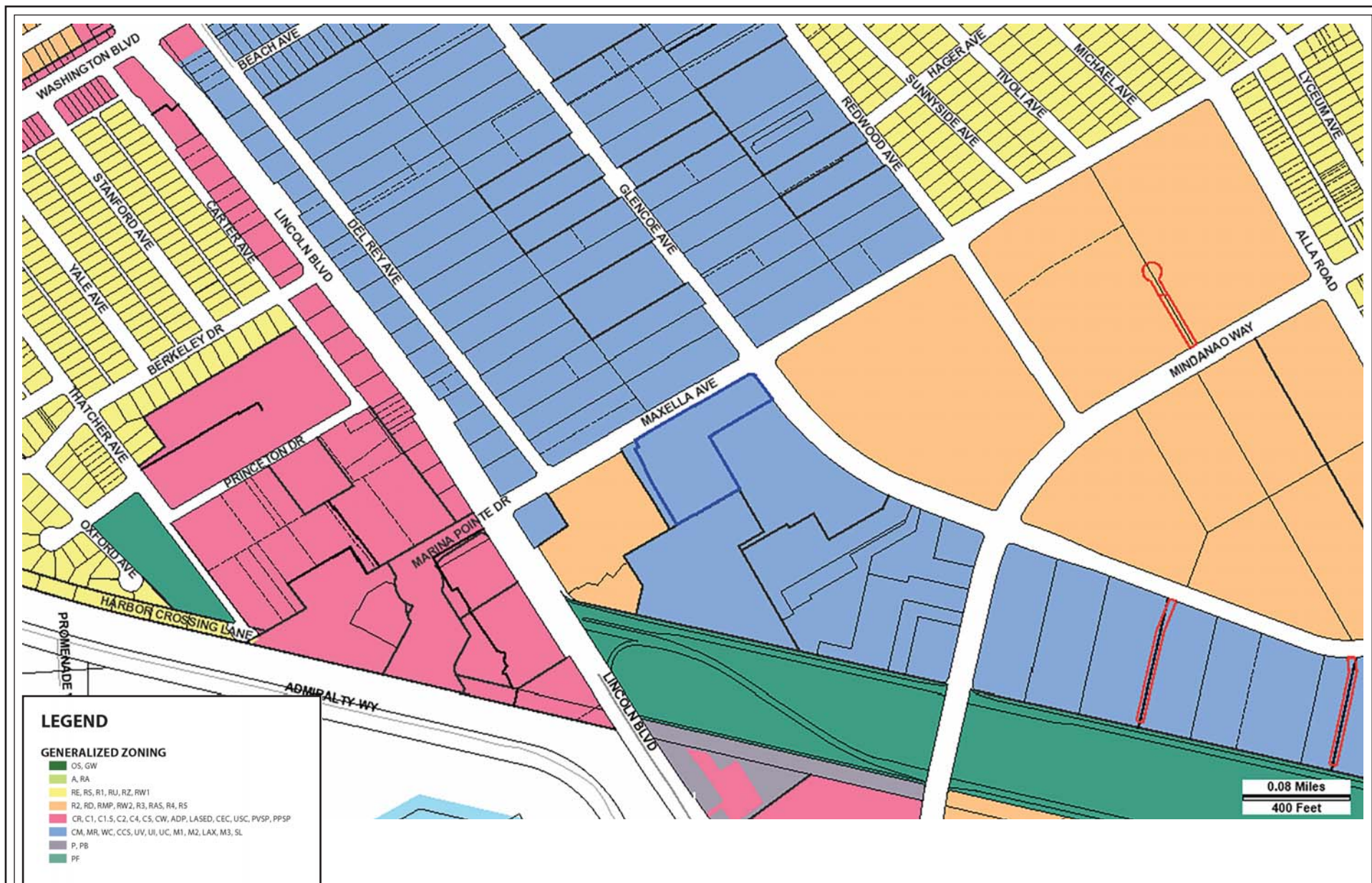


Figure IV.G-2
Zoning Designations on the Project Site

(b) Los Angeles Municipal Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Figure IV.G-2 on page IV.G-9, the entire Project Site is zoned as [Q]M1-1 (Qualified Limited Industrial, Height District 1). The Limited Industrial zone permits a wide array of land uses. Specifically, the M1 Zone permits any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. Height District 1 within the M1 Zone normally imposes no height limitation and has a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 Zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. The Q conditions also establish recycling and graffiti removal requirements for the Project Site. The Project's consistency with the LAMC is provided below in Subsection 3.d.(3)(b).

(c) City of Los Angeles Coastal Transportation Corridor Specific Plan

The Specific Plan is intended to: provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new commercial and industrial development within the corridor; establish the Coastal Transportation Corridor Impact Assessment Fee process for new development in the C, M, and P zones and for development on property owned by the Department of Airports; regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses; establish a Coastal Transportation Corridor infrastructure implementation process; promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersections from severe overload; avoid peak hour Level of Service (LOS) on streets and interchanges from reaching LOS F or, if presently LOS F, preclude further deterioration in the Level of Service; promote the development of coordinated and comprehensive transportation plans and programs with other jurisdiction and public agencies; reduce commute trips by encouraging the development of affordable housing at or near job sites; ensure that the public transportation facilities that will be constructed with funds generated by the Specific Plan will significantly benefit the contributor; and encourage Caltrans to widen the San Diego Freeway for high-occupancy vehicle lanes. The Project's consistency with the Specific Plan is provided below in Subsection 3.d.(3)(c).

(d) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by City of Los Angeles DCP staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and "flexibility is necessary and encouraged to achieve excellent design."⁵ The City's Urban Design Studio, which is part of the City of Los Angeles DCP, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals.⁶ Accordingly, the elements of the Citywide Design Guidelines are considered in the aesthetic impact analysis in Section IV.A, Aesthetics, of this Draft EIR.

(e) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the Framework Element. DCP staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and all community members to create enhanced pedestrian movement, and access, comfort, and safety, thereby contributing to improving the walkability of the City. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.⁷

⁵ City of Los Angeles Department of City Planning, *Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects*, May 2011, p. 5.

⁶ City of Los Angeles Department of City Planning, *Urban Design Studio*, <http://urbandesignla.com/about.php>, accessed January 5, 2018.

⁷ City of Los Angeles Department of City Planning, *Walkability Checklist Guidance for Entitlement Review*, November 20.

In the field of urban design, walkability is the measure of the overall walking conditions in an area. Different factors have been identified with regard to enhancing walkability in the private versus public realms. Specific factors influencing walkability within the private realm (private areas of projects) include building orientation, building frontages, signage and lighting, on-site landscaping, and off-street parking and driveways. Contributors influencing walkability within the public realm include sidewalks, crosswalks/street crossings, on-street parking, and utilities. Street connectivity, access to transit, aesthetics, landscaping, and street furniture are additional components that are discussed in the Walkability Checklist as they also influence the pedestrian experience.

As with the design principles included in the Urban Form and Neighborhood Design Chapter of the Framework Element, the guidelines provided in the Walkability Checklist are not appropriate for every project. The primary goal is to consider the applicable guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm. The Project's consistency with applicable design guidelines in the Walkability Checklist is discussed in the impact analysis below.

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

The City of Los Angeles has adopted various environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), Los Angeles Fire Department Strategic Plan, Los Angeles Public Library Strategic Plan 2015–2020, Public Recreation Plan, 2010 Bicycle Plan, Los Angeles Department of Water and Power 2015 Urban Water Management Plan, Sustainable City pLAN, Green LA (the City's climate action plan), and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. These plans, policies, and ordinances are discussed in their respective environmental topic sections throughout Section IV, Environmental Impact Analysis, of this Draft EIR.

(2) Regional

Regional land use plans that govern the general Project area include the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and Regional Comprehensive Plan; and the Los Angeles County Congestion Management Program, administered by the Los Angeles County Metropolitan Transportation Authority (Metro). In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan, which addresses the attainment of State and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

(a) *Southern California Association of Governments*

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

(i) *Regional Transportation Plan/Sustainable Communities Strategy*

SCAG's 2016–2040 RTP/SCS, adopted on April 7, 2016, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2016–2040 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2016–2040 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. Further, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.⁸ Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for “High Quality Transit Areas,” “Livable Corridors,” and “Neighborhood Mobility Areas” as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life.⁹ High-Quality Transit Areas (HQTAs) are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.¹⁰ Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways. Neighborhood Mobility Areas are areas with roadway networks where Complete Streets and sustainability policies support and encourage replacing single and multi-occupant automobile use with biking, walking, skateboarding, and slow speed electric vehicles. Local jurisdictions are encouraged to focus housing and

⁸ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166.

⁹ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 2.

¹⁰ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

employment growth within High-Quality Transit Areas.¹¹ The Project Site is located within a designated High-Quality Transit Area under the 2016–2040 RTP/SCS.¹²

The Project's consistency with the applicable goals of the 2016–2040 RTP/SCS is analyzed in Table IV.G-4 on page IV.G-55 in the impact analysis below.

(ii) Regional Comprehensive Plan

SCAG prepared and issued an updated Regional Comprehensive Plan in 2008 in response to SCAG's Regional Council directive in SCAG's 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The Regional Comprehensive Plan is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The Regional Comprehensive Plan may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The Regional Comprehensive Plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness.

The Project's consistency with applicable goals and policies of the Regional Comprehensive Plan is analyzed in Table IV.G-5 on page IV.G-57 in the impact analysis below.

(b) South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, the SCAQMD has prepared the 2016 Air Quality Management Plan establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section IV.B, Air Quality, of this Draft EIR for an analysis of the Project's consistency with the Air Quality Management Plan.

¹¹ SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 76.

¹² SCAG, *The 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life*, adopted April 2016, Exhibit 5.1.

*(c) Los Angeles County Metropolitan Transportation Authority (Metro)
Congestion Management Program*

Metro administers the Congestion Management Program, a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The Congestion Management Program, revised in 2010, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The Congestion Management Program guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour be evaluated. The guidelines also require the evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Refer to Section IV.J, Transportation/Traffic, of this Draft EIR, for further discussion of the Project's consistency with the Congestion Management Program.

b. Existing Conditions

(1) Project Site

The Project Site is currently occupied by three structures, including a two-story Barnes & Noble bookstore located along the northeast corner of the Project Site, near the Maxella Avenue and Glencoe Avenue intersection; a single-story building providing a variety of retail uses located generally within the southern portion of the Project Site, along Glencoe Avenue; a two-story commercial and retail building located generally within the western portion of the Project Site; and surface parking and circulation areas. The existing surface parking areas within the Project Site include a total of 418 parking spaces. Vehicular access to the Project Site is currently available via driveways on Maxella Avenue and Glencoe Avenue. Pedestrian access is available from the vehicular access points and from other areas along Maxella Avenue and Glencoe Avenue.

Landscaping within the Project Site includes ornamental landscaping and hardscape features. Street trees and trees within the Project Site consist of various non-native species, including palm, pine, fig, gum, fern, cajeput, carrotwood, octopus, strawberry, and olive trees that are not subject to the City's Protected Tree Regulations.¹³

¹³ *The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

As shown in Figure IV.G-2 on page IV.G-9, the entire Project Site is zoned as [Q]M1-1 (Qualified Limited Industrial, Height District 1).

(2) Surrounding Uses

As shown in the aerial photograph in Figure II-2 in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Physically divide an established community; or

Threshold (b): 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; or

Threshold (c): Conflict with any applicable habitat conservation plan or natural community conservation plan.

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate land use:

(1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

(2) Land Use Compatibility

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

b. Methodology

(1) Conflict with Land Use Plan

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site. State CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.¹⁴

More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,”

¹⁴ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

(2) Physically Divide a Community

The intent of the analysis is to determine whether the Project would be compatible with surrounding uses in relation to use, size, intensity, density, scale, and other physical and operational factors. The analysis is intended to determine whether existing communities or land uses would be disrupted, divided, or isolated by the Project, with consideration given to the duration of any disruptions. The analysis is based on aerial photography, land use maps, and field surveys in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form, based on a comparison of existing land use relationships in the vicinity of Project Site under existing conditions at the time of the Notice of Preparation was issued, to the conditions that would occur with implementation of the Project.

c. Analysis of Project Impacts

(1) Project Design Features

No specific project design features beyond the project improvements discussed in Section II, Project Description, of this Draft EIR, are proposed with regard to land use.

(2) Relevant Project Characteristics

(a) Proposed Land Uses

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes a new mixed-use development consisting of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of restaurant space.

The proposed multi-family residential and neighborhood-serving commercial uses would be provided within three buildings (herein referred to as Building 1, Building 2, and Building 3) that would be organized around an outdoor pedestrian paseo that would be orientated both east–west across the Project Site¹⁵ and north–south through the center of the Project Site and connect to a public plaza along the northwestern portion of the Project

¹⁵ *The east–west paseo would be pedestrian-oriented, but would also provide emergency vehicle access for the Project.*

Site and a publicly accessible, privately maintained open space area along the southwestern portion of the Project Site.

Building 1 would be comprised of a seven-story, mixed-use structure located along the western portion of the Project Site, adjacent to an access driveway and the Stella apartments. Building 2 would be comprised of a seven-story, mixed-use structure located at the southwest corner of Maxella Avenue and Glencoe Avenue. Building 3, located within the southern portion of the Project Site, also along Glencoe Avenue, would be comprised of a seven-story, mixed-use structure. The proposed commercial uses would be concentrated at the ground level within each of the buildings. Also at the ground level, the Project would include townhomes, residential lobbies, and leasing areas. The second story of Building 1, Building 2, and Building 3 would be a podium level, which would include amenities such as pools, a spa, and outdoor kitchens with lounges and seating. The proposed multi-family dwelling units consisting of studio, one-bedroom, and two-bedroom units would be distributed from the ground level up to the seventh story of the three buildings. The proposed buildings would reach an approximate height of 77 feet above grade level. Along Glencoe Avenue, Building 2 and Building 3 would feature building step backs to form landscaped terraces on the seventh floor that would, in conjunction with the amenity deck at the podium level, serve to reduce the apparent height of these buildings when viewed from Glencoe Avenue.

Building 1 would be set back at least 43 feet from the property line along Maxella Avenue and at least 15 feet from the property line on the west. Building 2 would be set back at least 11 feet from the property line along Maxella Avenue. Building 2 and Building 3 would be set back at least 15 feet from the property line along Glencoe Avenue. Building 3 would be set back at least 20 feet from the primary shopping center access driveway located south of the Project Site ingress and egress to Glencoe Avenue.

(b) Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via five driveways, including two entry/exit driveways along the access driveway located adjacent to Building 1, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site. Trash collection trucks would access the Project Site primarily from Glencoe Avenue and from Hotel Drive, adjacent to Building 1. The trash collection area would be enclosed and would not be visible to the surrounding uses.

New pedestrian access points would be created throughout the Project Site via the pedestrian paseo and an internal street. From the pedestrian paseo and the public plaza proposed along the northwestern portion of the Project Site, pedestrians would be able to access Marina Marketplace shopping center-related uses across Maxella Avenue via the

existing pedestrian crosswalk along Maxella Avenue. At the southern terminus of the pedestrian paseo, pedestrians would be able to access Marina Marketplace shopping center-related uses south of the Project Site. Bicycle access would also be provided throughout the Project Site, including via the vehicular access points on Glencoe Avenue and Maxella Avenue. Bicycle storage areas would be included in the ground-floor level of the proposed buildings. In total, 752 bicycle parking spaces would be provided for the proposed residential and neighborhood-serving commercial uses.

The proposed uses would be supported by 1,217 parking spaces that would be distributed throughout the Project Site within two subterranean levels that would extend to a depth of approximately 28 feet and in two above grade parking levels located within each of the three buildings. Parking for residents would be provided primarily within the above- and below-grade parking levels within the buildings while parking for the commercial uses would be provided primarily within the ground floor parking levels. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking.

(c) Open Space and Recreational Amenities

The Project would provide a variety of open space and recreational amenities. Private open space and recreational amenities available to Project residents and guests of residents would include: balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. To enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Approximately 370 trees would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. Landscaping features such as benches, tables and seating, tree up lighting, pet walking routes, open play space, and jogging routes would also be implemented. In total, the Project would provide at least 70,175 square feet of open space in accordance with the open space requirements set forth in the Los Angeles Municipal Code.

(d) Signage and Lighting

The Project would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would also be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes as well as design requirements while providing appropriate light

levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting, including lighting fixtures on the pool deck, would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting shall meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the Los Angeles Municipal Code. Proposed signage would include identity signage, either blade or monument, on the three major Project Site corners, building and tenant signage, and general ground level and way-finding pedestrian signage. No off premises or billboard advertising is proposed as part of the Project. The Project would also not include signage with flashing, mechanical, or strobe lights. In general, new signage would be architecturally integrated into the design of the proposed buildings and would establish appropriate identification for the residential and commercial uses. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially-zoned property.

(e) Sustainability

The Project's design is based on principles of smart growth and environmental sustainability, as evidenced by its mixed-use composition, emphasis on walkability and public open space, bike-friendly environment, proximity to public transit including bus stops adjacent to the Project Site, and the presence of existing infrastructure needed to serve the proposed uses. The new buildings would be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). Such features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of

environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible.

(f) Discretionary Actions

Approvals required for development of the Project may include, but are not limited to the following:

- Pursuant to LAMC Section 11.5.6 and Section 12.32, a General Plan Amendment to the Palms–Mar Vista–Del Rey Community Plan to change the Community Plan land use designation from Limited Manufacturing to General Commercial;
- Pursuant to LAMC Section 12.32.Q, a Vesting Zone and Height District Change from [Q]M1-1 to (T)(Q)C2-2D to allow the Project's proposed FAR of 2.60:1, height of 77 feet, and residential uses;
- Pursuant to LAMC Section 16.05, Site Plan Review;
- Pursuant to LAMC Section 12.24.W, a Master Conditional Use Permit to allow the onsite and offsite sales of a full line of alcoholic beverages;
- Pursuant to LAMC Section 12.20.2, a Coastal Development Permit;
- Pursuant to California Government Code Sections 65590 and 65590.1 (commonly called the Mello Act) and the City of Los Angeles Interim Administrative Procedures for Complying with the Mello Act, Mello Act Compliance Review;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map and haul route;
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to haul route, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

(3) Project Impacts

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

The Project is a mixed-use development that would provide new residential and neighborhood-serving commercial (retail/restaurant) uses that would be compatible with and would complement existing and future development within the Project area. The Project would represent an extension and reflection of the existing surrounding urban environment.

While the Project would increase the density, scale, and height of development on the Project Site, these changes would not be out of character with the surrounding area, which is an urbanized neighborhood that is characterized by a varied mix of land uses at various scales of development. The Project Site is specifically located in an area that is characterized by low-, mid-, and high-rise buildings occupied by commercial, office, and multi-family uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. The proposed seven-story mixed-use buildings would be compatible with existing mid-rise buildings in the vicinity of the Project Site, including the six-story multi-family Stella apartment complex located immediately to the west, the five-story Hotel MdR located southwest of the Project Site, the four-story apartment complex located northeast of the Project Site, and the two-story Marina Marketplace with three-story parking structure located north of the Project Site. Therefore, the Project's proposed residential and neighborhood-serving commercial uses would be consistent with and compatible with the scale of the existing uses surrounding the Project Site.

The Project would not create any division of land or divide an established community. The Project would improve and enhance the existing streetscape surrounding the Project Site to promote pedestrian activity in the vicinity of the Project Site. Specifically, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From there, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.

Based on the analysis above, the Project would not substantially or adversely change the existing land use relationships between the Project Site and existing off-site uses, or have a long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. The Project would not physically divide an established community, and impacts would be less than significant.

Threshold (b): 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?

(a) Consistency with Local Plans and Applicable Policies

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of the Framework Element, the Conservation Element, the Housing Element, the Health and Wellness Element, the Palms–Mar Vista–Del Rey Community Plan, the Design Guide, the LAMC, and the Specific Plan.

(i) City of Los Angeles General Plan

Los Angeles General Plan Framework Element

The Project's general consistency with the applicable objectives and policies that support the goals set forth in the Framework Element's Land Use Chapter is analyzed in Table IV.G-1 on page IV.G-25.

Land Use Chapter

As demonstrated by the discussion in Table IV.G-1, the Project would support and would be generally consistent with the Framework Element's Land Use Chapter. The Project would support the needs of the City's existing and future residents, businesses, and visitors by providing 658 residential units and up to 27,300 square feet of neighborhood-serving commercial (retail/restaurant) uses. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

The Project would also support the City's policy to provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial districts by introducing a mixed-use development within the Project Site that would feature a similar mix of land uses as the existing uses surrounding the Project Site. Additionally, the Project would develop mixed-use buildings that would be designed to be complementary to, and compatible with, surrounding uses. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Land Use chapter.

Housing Chapter

As demonstrated by the discussion in Table IV.G-1, the Project would be consistent with the relevant objectives that support the goals of the Housing Chapter of the Framework Element. Specifically, the Project would support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of

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

Objective/Policy	Analysis of Project Consistency
Land Use Chapter	
Chapter 3. Issue One: Distribution of Land Use	
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	Consistent. While this policy refers to the citywide provision of public infrastructure, as discussed in Section IV.I, Public Services, and Section IV.L, Utilities and Service Systems, of this Draft EIR, agencies providing public services and utilities to the Project Site have capacity to serve the Project.
Policy 3.1.5: Allow amendments to the community plans and coastal plans to further refine General Plan Framework Element land use boundaries and categories to reflect local conditions, parcel characteristics, existing land uses, and public input. These changes shall be allowed provided (a) that the basic differentiation and relationships among land use districts are maintained, (b) there is no reduction in overall housing capacity, and (c) additional environmental review is conducted in accordance with the California Environmental Quality Act should the impacts of the changes exceed the levels of significance defined and modify the conclusions of the Framework Element's Environmental Impact Report.	Consistent. The Project would require an amendment to the Community Plan from Light Manufacturing to General Commercial. With a mix of land uses, including needed housing and neighborhood-serving commercial, the Project would maintain the basic differentiation and relationships among land use districts and increase overall housing capacity. In addition, the Project is subject to environmental review in accordance with CEQA.
Policy 3.1.7: Allow for development in accordance with the policies, standards, and programs of specific plans in areas in which they have been adopted. In accordance with Policy 3.1.6, consider amending these plans when new transit routes and stations are confirmed and funding is secured.	Consistent. The Project Site is within the City of Los Angeles Coastal Transportation Corridor Specific Plan. As discussed in detail below, the Project would be consistent and would comply with the relevant provisions of the Specific Plan.
Objective 3.2: 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.	Consistent. The Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Specifically, the Project Site is currently served by a total of 12 bus routes. In addition, the Project Site is located within a designated High-Quality Transit Area under the 2016–2040 RTP/SCS. The Project also includes a total of 752 bicycle parking spaces for residents and visitors, thereby promoting a reduction of vehicle trips. Furthermore, the Project includes streetscape improvements to activate the surrounding streets and provide a pedestrian-friendly walkable environment. As such, the Project would provide opportunities for the use of alternative modes of

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

Objective/Policy	Analysis of Project Consistency
	transportation, including access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled and an associated reduction in air pollution.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	Consistent. Refer to the consistency analysis for Objective 3.2.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	Consistent. As described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site. The Project would support this objective by developing mixed-use buildings seven-stories tall that would be designed in a contemporary architectural style that would be consistent with the surrounding uses. Therefore, the Project would maintain the prevailing scale and character of the nearby developments, and would enhance the character of the surrounding commercial area.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	Consistent. As detailed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Project's population and employment growth would be well within SCAG's projections for the Los Angeles Subregion, which serve as the basis for the Framework Element's demographics projections and planned provisions of transportation and utility infrastructure and public services. In addition, as discussed in Section IV.I, Public Services, Section IV.J, Transportation/Traffic, and Section IV.L, Utilities and Service Systems, of this Draft EIR, public services, transportation, and utility infrastructure would be adequate to support the Project.

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

Objective/Policy	Analysis of Project Consistency
Section 3. Issue Two: Uses, Density, Characteristics Multi-Family Residential	
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	Consistent. The Project would remove the existing commercial uses within the Project Site and redevelop the Project Site with a mix of multi-family residential and commercial uses, thereby revitalizing the existing Project Site and expanding the offering of uses and services in the area, including open space areas for residents and visitors. Overall, the Project would create a new development that would enhance the Project Site and surrounding area for existing and future residents.
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.	Consistent. Refer to the consistency analysis for Policy 3.1.2 and Policy 3.2.4.
Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.	Consistent. The Project Site is currently designated as Limited Manufacturing by the Community Plan and zoned [Q]M1-1 (Qualified Limited Industrial, Height District 1) by the LAMC. The Project includes a city-initiated proposed General Plan Amendment to change the land use designation from Limited Manufacturing to General Commercial and a proposed vesting zone change to change the zoning from [Q]M1-1 to (T)(Q)C2-2D. The C2 zone permits a residential density in accordance with the R4 Zone (400 square feet per unit), which would allow the proposed 658 multi-family residential units. Therefore, the proposed multi-family uses as part of the Project would be permitted with approval of the general plan amendment and vesting zone change and, thus, comply with this policy.
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.	Consistent. As discussed in the consistency analysis below under the Urban Form and Neighborhood Design Chapter, the Project would be consistent with the relevant goals, objectives, and policies of the General Plan Framework's Urban Form and Neighborhood Design Chapter. Specifically, the Project would construct a new mixed-use development containing residential and commercial (retail/restaurant) uses that would activate the existing Project Site and serve the existing and future residents of the surrounding community. The Project would replace the existing older low-rise commercial uses on the Project Site with three seven-story buildings that would be similar to and compatible with the adjacent properties and surrounding neighborhood. The Project would also promote a pedestrian environment by providing paved plazas with seating, landscaped paseos, and landscaped open space at the ground level. The proposed plazas located along the

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

Objective/Policy	Analysis of Project Consistency
	northwest portion and in the center of the Project Site would connect to a publicly accessible, privately maintained open space area, including a one-story amenity building, which would be used as flex space for meetings, and additional seating located along the southwestern portion of the Project Site via an outdoor pedestrian paseo that would run north-south and east-west through the center of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.
Chapter 3. Issue Two: Uses, Density, Characteristics General Commercial Areas	
Objective 3.12: Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.	Consistent. As described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site. The Project would support this objective by developing mixed-use buildings seven-stories tall that would be designed in a contemporary architectural style that would be consistent with the surrounding uses.
Section 3. Issue Two: Uses, Density, Characteristics Mixed-Use Boulevards	
Policy 3.13.4: Provide adequate transitions where commercial and residential uses are located adjacent to one another.	Consistent. As part of the Project, commercial uses would be provided at the ground level of the proposed buildings. By providing the proposed commercial uses at the ground level, the Project would allow for connectivity between the Project's commercial uses and the commercial uses across Maxella Avenue to the north.
Section 3. Issue Two: Uses, Density, Characteristics Industrial	
Policy 3.14.6: Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community	Consistent. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue;

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

Objective/Policy	Analysis of Project Consistency
<p>plans based on the following criteria:</p> <ul style="list-style-type: none"> a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development; b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development; c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods; d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses; e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas; f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses; g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas. 	<p>additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site. Although the Project Site is designated as Limited Manufacturing under the Community Plan, it is developed with commercial uses and has never been used for industrial purposes. The Project's uses would be more compatible with nearby residential and commercial uses than industrial uses. As described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Development of the Project would represent a continuation of existing development patterns and would not result in a fragmented pattern of development. At approximately 6 acres, the Project Site represents only approximately 3.1 percent of the industrially-zoned property and .22 percent of the total land in the Community Plan area. Therefore, development of the Project would not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts.</p>
<p>Chapter 3. Issue Two: Uses, Density, Characteristics Existing Area of Over-Concentration of Density</p>	
<p>Objective 3.18: Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.2 and Policy 3.2.4.</p>

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

Objective/Policy	Analysis of Project Consistency
<i>Housing Chapter</i>	
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.	Consistent. The Project would be located in a high activity area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. In addition, the Project Site is located within a designated High-Quality Transit Area under the 2016–2040 RTP/SCS. While the Project Site is not immediately adjacent to low-density residential neighborhoods, the Project would be designed to be compatible in scale with the surrounding areas. The Project Site's proximity to public transit would promote use of alternative modes of transportation and reduce vehicle trips. Refer to the consistency analysis for Policy 3.2.4 for a discussion of the Project's location within an area occupied by buildings of a similar scale and character as those proposed by the Project.
Objective 4.3: Conserve scale and character of residential neighborhoods.	Consistent. Refer to Policy 3.2.4, above.
<i>Urban Form and Neighborhood Design Chapter</i>	
Policy 5.7.1: Establish standards for transitions in building height and for on-site landscape buffers.	Consistent. The Project design reflects a transition in building heights with regard to the surrounding neighborhood's character. In particular, the Project is designed to step back from the lower-rise structures in the vicinity of the Project Site to provide adequate transitions between the existing adjacent uses and the Project buildings. In addition, the proposed buildings would include building fenestration, a variety of surface materials and colors, and varying rooflines to create horizontal and vertical articulation and provide visual interest.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	Consistent. Project signage would be designed to be aesthetically compatible with the existing and proposed architecture and with other signage in the surrounding neighborhood. All on-site signage would be consistent with the LAMC.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent. The Project would incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project will include the following: a closed-circuit security camera system and keycard entry for the residential buildings and the residential parking areas; proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of parking area to maximize visibility and reduce areas of

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

Objective/Policy	Analysis of Project Consistency
	concealment; and design of project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, to the extent practicable.
Open Space and Conservation Chapter	
<p>Objective 6.3: Ensure that open space is managed to minimize environmental risks to the public.</p> <p>Policy 6.3.3: Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.</p>	<p>Consistent. The Project would incorporate elements that promote individual and community safety throughout the Project Site, including open space areas that are well-lit and visible to surrounding uses. Also refer to the consistency analysis for Objective 5.9 regarding the security features proposed to be implemented by the Project.</p>
Economic Development Chapter	
<p>Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.</p>	<p>Consistent. The Project would support this objective by providing a diverse mix of complementary uses at the Project Site, including the development of 658 multi-family residential units and an estimated 27,300 square feet of neighborhood-serving commercial (retail/restaurant) uses that would serve the community and future businesses. The proposed neighborhood-serving commercial (retail/restaurant) uses would complement the employment base of the Community Plan area, meet the needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution to ensure maximum feasible environmental quality.</p>
<p>Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.</p>	<p>Consistent. Refer to the consistency analysis for Objective 3.2.</p>
<p>Policy 7.2.9: Limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use.</p>	<p>Consistent. As set forth above, the proposed zone change/General Plan Amendment meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use.</p>
Mobility Plan 2035	
<p>Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.</p>	<p>Consistent. During construction of the Project, the majority of construction activities would be anticipated to be confined on-site. However, limited construction activities may be needed on adjacent right-of-ways. As part of Project Design Feature TR-PDF-1 included in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project Applicant would prepare and implement a work site</p>

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

Objective/Policy	Analysis of Project Consistency
	<p>traffic control plan. The work site traffic control plan would identify the location of any temporary street parking or sidewalk closures, provide for the posting of signs advising pedestrians of temporary sidewalk closures and provide alternative routes, provide for the installation of other construction-related warning signs, and show access to abutting properties. The Worksite Traffic Control Plan would ensure that the potential conflicts between construction activities, street traffic, bicyclists and pedestrians are minimized. Thus, in compliance with this policy, the Project would provide safe passage for all modes of travel during times of construction.</p>
<p>Policy 2.3: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p>Consistent. In support of this policy, the Project would be designed to promote walkability in the Project Site vicinity. Specifically, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Pedestrian access to the ground-floor commercial retail and restaurant uses would be provided from Maxella Avenue and Glencoe Avenue. Project residents would access their units from a residential lobby on the ground level. The lobby may also be accessed from the parking garage. As provided in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would relocate the existing traffic signal on Maxella Avenue at the crosswalk approximately 100 feet to the west of the Ocean Way intersection such that all movements (vehicular, pedestrian, and bicycle) would be controlled by a traffic signal. This crosswalk would be subject to approval by the Los Angeles Department of Transportation.</p> <p>Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.</p>
<p>Policy 2.6. Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.</p>	<p>Consistent. The Project will provide 724 bicycle parking spaces for the proposed residential uses and 28 bicycle parking spaces to support the retail uses.</p>
<p>Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.</p>	<p>Consistent. As part of the Project, loading areas for truck deliveries, trash pickup, resident move-ins, and maintenance of in-garage equipment would be provided off-street.</p>
<p>Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods</p>	<p>Consistent. The Project is located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa</p>

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

Objective/Policy	Analysis of Project Consistency
movement—as integral components of the City’s transportation system.	Monica Big Blue Bus. In addition, the Project Site is located within a designated High-Quality Transit Area under the 2016–2040 RTP/SCS. The Project would also promote alternative transportation by providing bicycle parking spaces for residents and visitors. The streetscape improvements proposed by the Project along Maxella Avenue and Glencoe Avenue would also promote walkability in the vicinity of the Project Site. The Project would also provide adequate vehicular access. Thus, the Project recognizes and provides opportunities for the use of all modes of travel. The Project Site’s proximity to public transit would promote use of alternative modes of transportation and reduce vehicle trips.
Policy 3.2: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent. The Project would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) and the City.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new mixed-use development consisting of residential and neighborhood-serving commercial (retail/restaurant) uses in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services along Maxella Avenue and in proximity to Lincoln Boulevard.
Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. As previously discussed, the Project Site is served by existing public transportation, including 12 bus lines, and will encourage non-auto travel to reduce the use of single-occupant vehicle trips by promoting walkability in the vicinity of the Project Site through the inclusion of various streetscape improvements. In addition, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would relocate the existing traffic signal on Maxella Avenue at the crosswalk approximately 100 feet to the west of the Ocean Way intersection such that all movements (vehicular, pedestrian, and bicycle) would be controlled by a traffic signal, subject to approval by LADOT. The Project would also include a public plaza along Maxella Avenue to further encourage pedestrian activity. Furthermore, the Project would provide 752 bicycle parking spaces to serve the residential and neighborhood-serving commercial uses.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Specifically, the Project Site is currently served by a total of 12 bus routes. In addition, the Project Site is located within a designated High-Quality Transit Area under the 2016–2040 RTP/SCS. The Project

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

Objective/Policy	Analysis of Project Consistency
	also includes 752 bicycle parking spaces for the proposed residential and neighborhood-serving commercial uses. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled.
Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	Consistent. While this policy applies to citywide goals relative to fuel sources, technologies and infrastructure, the Project would facilitate the use of alternative-fuel vehicles by providing 20 percent of the Project's Code-required parking spaces that are electric vehicle-ready and 5 percent of the Project's Code-required parking spaces that are further equipped with electric vehicle charging stations as identified in Project Design Features GHG-PDF-3 and GHG-PDF-4 provided in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR.
Policy 5.5: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	Consistent. As discussed in Section IV.F, Hydrology and Water Quality, of this Draft EIR, the Project would introduce new landscaping to the Project Site which would decrease the amount of impervious surface area on-site by approximately 8 percent from 96 percent to 88 percent. Thus, stormwater flows from the Project Site would not increase with implementation of the Project. The Project would also include best management practices (BMPs) to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the Standard Urban Stormwater Mitigation Plan (SUSMP). With the implementation of the BMPs, the Project would reduce runoff from entering the wastewater system and would maximize opportunities to capture and infiltrate stormwater.
Infrastructure and Public Services Chapter	
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking	Consistent. Project lighting would include low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes; and low-level lighting to

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

Objective/Policy	Analysis of Project Consistency
lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	accent signage, architectural features, and landscaping elements. All on-site exterior lighting would be automatically controlled to illuminate only when necessary and, as set forth above in Project Design Feature AES-PDF-8, would be shielded or directed toward areas to be illuminated.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	Consistent. Refer to the consistency analysis for Policy 5.5 above under the Mobility Plan 2035 policy discussion.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	Consistent. Refer to the consistency analysis for Policy 5.5 above under the Mobility Plan 2035 policy discussion.
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	Consistent. As evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would be within the Los Angeles Department of Water and Power's (LADWP) current and projected available water supplies for normal, single-dry, and multiple-dry years. As discussed therein, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and no system upgrades would be required as a result of the Project.
Objective 9.40: Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	Consistent. As discussed above in the Regulatory Framework, the California Energy Code stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. All Project lighting would be designed to comply with the requirements of the California Energy Code and the California Green Building Standards Code.
Policy 9.40.3: Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	Consistent. Refer to Objective 9.40, above.
<hr/> <p><i>Source: Eyestone Environmental, 2019.</i></p>	

housing units of various types through the development of 658 new multi-family residential units (including 66 affordable units) consisting of studio, one-, and two-bedroom units. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating the Project in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus and in an area identified as a High-Quality Transit Area under the 2016–2040 RTP/SCS. Therefore, as discussed in detail in Table IV.G-1 on page IV.G-25 on page IV.G-25, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Housing Chapter.

Urban Form and Neighborhood Design Chapter

As demonstrated by the discussion in Table IV.G-1, the Project would be consistent with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element. In particular, the Project would support the City's policy to establish standards for transitions in building height as the Project is designed to step back from the lower-rise structures in the vicinity of the Project Site to provide adequate transitions between the existing adjacent uses and the Project buildings. The Project would also incorporate elements that would promote individual and community safety, as detailed in Table IV.G-1. Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

As demonstrated by the discussion in Table IV.G-1, the Project would be consistent with the relevant objective and policy that support the goals of the Open Space and Conservation Chapter of the Framework Element. Specifically, the Project would utilize development standards to promote development of public open space that is visible and safe, including providing open space areas that are well-lit and visible to surrounding uses.

Economic Development Chapter

As demonstrated by the discussion in Table IV.G-1, the Project would be consistent with the relevant objective and policies that support the goals of the Economic Development Chapter of the Framework Element. Specifically, the Project would establish a balance of land uses that assures maximum feasible environmental quality by introducing a diverse mix of complementary uses within the Project Site, including the development of residential units and neighborhood-serving commercial (retail/restaurant) uses. The proposed uses would complement the employment base of the Community Plan area and meet the needs of local residents, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution. Thus, the Project would be consistent with the applicable

objectives and policies that support the goals set forth in the Economic Development Chapter.

Mobility Plan 2035

As demonstrated by the discussion in Table IV.G-1 on page IV.G-25, the Project would be consistent with the relevant objectives and policies that support the goals of Mobility Plan 2035. Specifically, the Project would support all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. In particular, the Project would be designed to promote walkability in the Project Site vicinity by providing a landscaped public plaza at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo that would extend south to a proposed publicly accessible, privately maintained open space area. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. The Project would further promote alternative modes of transportation by providing a total of 752 bicycle parking spaces for the proposed multi-family residential and neighborhood-serving commercial uses. In addition, the Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus and in an area identified as a High-Quality Transit Area under the 2016–2040 RTP/SCS. Thus, residents, workers, and visitors of the Project would be well-served by existing transit services. The Project would also support the City's policy to encourage the adoption of low and zero emission fuel sources and supporting infrastructure by providing 20 percent of the Project's Code-required parking spaces with electric vehicle-ready chargers and 5 percent of the Project's Code-required parking spaces further improved with electric vehicle charging stations as identified in Project Design Features GHG-PDF-3 and GHG-PDF-4 provided in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Therefore, the Project would be consistent with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035.

Infrastructure and Public Services Chapter

As demonstrated by the discussion in Table IV.G-1, the Project would be consistent with the relevant objectives and policies that support the goals of the Infrastructure and Public Services Chapter of the Framework Element. Specifically, the Project would implement BMPs to reduce runoff from entering the wastewater system and maximize opportunities to capture and infiltrate stormwater. Furthermore, as evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Additionally, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and no system upgrades would be required as a result of the Project.

Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Infrastructure and Public Services Chapter.

Based on the analysis above, the Project would be consistent with the relevant goals, objectives, and policies of the Framework Element.

(ii) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is analyzed in Table IV.G-2 on page IV.G-39. As described therein, the Project would support the City's objectives and policies for promoting sustainable neighborhoods with a mix of uses by providing 658 new studio, one-bedroom, and two-bedroom multi-family residential apartment units, including 66 units designated for affordable housing, along with neighborhood-serving commercial (retail/restaurant) uses in an urbanized area with similar land uses. The Project would be located in close proximity to existing public services, facilities, and infrastructure, in addition to a variety of public transit services provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. The Project would also be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction. Such features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. Therefore, as detailed in Table IV.G-2, the Project would be consistent with the applicable policies set forth in the Housing Element of the City's General Plan.

(iii) Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Project would support the goals and objectives of the Health and Wellness Element to provide housing in a safe, livable, and sustainable environment by providing a variety of open space areas within the Project Site, promoting walkability and biking, and implementing safety features. Specifically, the Project would include balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. To enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be

Table IV.G-2
Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021

Policy	Analysis of Project Consistency
<p>Policy 2.1.1: Establish development standards and policing practices that reduce the likelihood of crime.</p>	<p>Consistent. As discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project Applicant would consult with the LAPD Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project. As provided in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project would include the following: a closed-circuit security camera system and keycard entry for the residential buildings and the residential parking areas; proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of parking area to maximize visibility and reduce areas of concealment; and design of project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, to the extent practicable.</p>
<p>Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.</p>	<p>Consistent. The Project would develop a diverse mix of residential and neighborhood-serving commercial (retail/restaurant) uses that would support the housing and employment needs of the local residents and would be compatible with the variety of residential and commercial uses surrounding the Project Site. The proposed 658 residential units, including 66 units designated for affordable housing, would consist of a mix of studio, one- and two-bedroom units intended to support a range of household types. In addition, the up to 27,300 square feet of ground-floor neighborhood-serving retail and restaurant uses would serve future residents, as well as the surrounding community. The Project would provide a variety of amenities, including balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. The Project would be located in proximity to Metro, Los Angeles Department of Transportation LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus bus lines. Specifically, the Project Site is currently served by a total of 12 bus routes, with bus stops located along Maxella Avenue adjacent to the Project Site and near Lincoln Boulevard as well as along Glencoe Avenue. In addition, the Project includes bicycle parking spaces for the proposed residential uses and the commercial uses. As previously discussed, the existing transportation and utility infrastructure, as well as public services, are available and would be adequate to support the Project. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, the Project's design is based on principles of smart growth and environmental sustainability, as evidenced by its mixed-use composition,</p>

Table IV.G-2 (Continued)
Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021

Policy	Analysis of Project Consistency
	emphasis on walkability and public open space, bike-friendly environment, and proximity to public transit including bus stops adjacent to the Project Site as described above.
Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.	Consistent. As previously noted, the Project's design is based on principles of smart growth and environmental sustainability, as evidenced by its mixed-use composition, emphasis on walkability and public open space, bike-friendly environment, proximity to public transit including bus stops adjacent to the Project Site. The Project will be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction. Such features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project will also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible.
Policy 2.3.2: Promote and facilitate reduction of water consumption in new and existing housing.	Consistent. As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, pursuant to the requirements of the City of LA Green Building Code and as provided for in Project Design Feature WAT-PDF-1, the Project would incorporate water saving fixtures to reduce its indoor water use by at least 20 percent. In addition, the Project will include a weather-based irrigation controller and appropriate landscaping to reduce its outdoor water use.
Policy 2.3.3: Promote and facilitate reduction of energy consumption in new and existing housing.	Consistent. The Project will be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System for new construction. Refer to Section IV.M, Energy Conservation and Infrastructure, of this Draft EIR, for a discussion on the Project features that would reduce energy consumption.
Policy 2.3.4: Promote and facilitate reduction of waste in construction and building operations.	Consistent. As discussed in Section IV.L.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, as provided in Project Design Feature SW-PDF-3, the Project Applicant would implement a construction waste management plan to recycle and/or salvage nonhazardous debris to achieve a minimum 75-percent diversion from landfills. In addition, in accordance with Project Design Feature SW-PDF-2, the Project would use building materials with a minimum of 10-percent recycled content for the construction of the Project. Furthermore,

Table IV.G-2 (Continued)
Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021

Policy	Analysis of Project Consistency
	during operation of the Project, the Project Applicant would provide on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials, as set forth in Project Design Feature L.3-1. Adequate storage areas for recycling containers during construction and after the building is occupied will also be provided.
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.	Consistent. As discussed in the consistency analysis for Objective 2.2 and Policy 2.2.1, above, the Project would develop a diverse mix of residential and neighborhood-serving commercial (retail/restaurant) uses that would support the housing and employment needs of the local residents and would be compatible with the variety of residential and commercial uses surrounding the Project Site. In particular, the proposed 658 residential units would include 66 affordable units and would consist of a mix of studio, one- and two-bedroom units intended to support a range of household types. As described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site. The Project would support this objective by developing mixed-use buildings seven-stories tall that would be designed in a contemporary architectural style that would be complementary to, and compatible with, these surrounding uses.
Policy 2.4.2: Develop and implement design standards that promote quality residential development.	Consistent. As discussed herein, the Project would be consistent with relevant design guidelines in the Community Plan's Urban Design Chapter, the General Plan Framework's Urban Form and Neighborhood Design Chapter, the Planning Department's Walkability Checklist, and the Citywide Design Guidelines. Therefore, the Project would be consistent with the intent of this policy.
Policy 2.4.3: Develop and implement sustainable design standards in public and	Consistent. The Project would incorporate design features that would reduce energy and water consumption

Table IV.G-2 (Continued)
Project Consistency with Applicable Policies of the General Plan Housing Element 2013–2021

Policy	Analysis of Project Consistency
private open space and street rights-of-way. Increase access to open space, parks and green spaces.	as described above in the consistency analysis for Objective 2.3. The Project would also provide a variety of open space and recreational amenities to enhance the open space resources of the neighborhood. Private open space and recreational amenities available to Project residents and guests of residents would include: balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. To enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. In total, the Project would provide approximately 70,175 square feet of open space in accordance with the open space requirements set forth in the LAMC.
<p><i>Source: Eyestone Environmental, 2019.</i></p>	

planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. The Project is also located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Furthermore, the Project would allow for convenient access to public transit and would provide 752 bicycle parking spaces for the proposed residential and commercial uses.

The Project would also incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project would include the following: a closed-circuit security camera system and keycard entry for the residential buildings and the residential parking areas; proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of parking area to maximize visibility and reduce areas of concealment; and design of project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, to

the extent practicable. Therefore, the Project would be generally consistent with the applicable goals and objectives set forth in the Health and Wellness Element.

(iv) Palms–Mar Vista–Del Rey Community Plan

As previously discussed, the land use designation for the Project Site under the Community Plan is Limited Manufacturing. The City has initiated a General Plan Amendment to amend the Project Site's Limited Manufacturing land use designation to the General Commercial land use designation to implement the Project. The Project's consistency with the objectives and policies set forth in the Community Plan is analyzed in Table IV.G-3 on page IV.G-44. As discussed therein, the Project would be generally consistent with the objectives and policies that support the goals of the Community Plan.

Specifically, the Project would support the City's objectives and policies to protect the quality of the residential and commercial environment with attention to the site and building design. The Project would be designed in a contemporary architectural style that would be complementary to, and compatible with, the surrounding uses, thereby, protecting the quality of the residential environment and the appearance of surrounding community.

In compliance with the Community Plan policies on police protection, the Applicant will be required to consult with the LAPD Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project, as discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR. The LAPD was also consulted as part of the preparation of this Draft EIR. The Project would also provide adequate lighting around the residential and commercial land uses and outdoor open spaces on the Project Site. With regard to fire protection, as set forth in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, the LAFD was consulted in conjunction with the preparation of this Draft EIR.

The Project would encourage alternative modes of transportation over the use of single occupant vehicles to reduce vehicles. Specifically, the Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. In addition, the Project includes bicycle parking to support the proposed residential and commercial uses. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. As such, the Project would promote the use of alternative modes of transportation, including convenient access

Table IV.G-3
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Residential	
Goal 1: A safe, secure and high quality residential environment for all community residents.	Consistent. The Project would be consistent with this goal as the Project incorporates elements that would promote individual and community safety. Specifically, as provided in Section IV.I.2, Public Services—Police Protection, of this Draft EIR, the Project would include the following: a closed-circuit security camera system and keycard entry for the residential buildings and the residential parking areas; proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of parking area to maximize visibility and reduce areas of concealment; and design of project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, to the extent practicable. Incorporation of these elements would provide a safe, secure, and high quality residential environment for the Project residents and surrounding community.
Policy 1-1.2: Protect the quality of residential environment and the appearance of communities with attention to site and building design.	Consistent. As described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the Hotel MdR and associated parking located southwest of the Project Site. The Project would support this policy by developing mixed-use buildings seven-stories tall that would be designed in a contemporary architectural style that would be complementary to, and compatible with, these surrounding uses, thereby, protecting the quality of the residential and commercial environment and the appearance of surrounding community. In particular, the Project would feature setbacks along Glencoe Avenue to provide a transition between the lower scale residential uses and the Project. In addition, the Project would feature similar heights and design elements as the adjacent Stella apartment complex.

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
<p>Objective 1-2: To reduce vehicular trips and congestion by developing new housing in proximity to services and facilities.</p>	<p>Consistent. The Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Specifically, the Project Site is currently served by a total of 12 bus routes. In addition, the Project includes 752 bicycle parking spaces to support the proposed residential and commercial uses. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. In addition, as provided in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would relocate the existing traffic signal on Maxella Avenue at the crosswalk approximately 100 feet to the west of the Ocean Way intersection such that all movements (vehicular, pedestrian, and bicycle) would be controlled by a traffic signal. This crosswalk is subject to approval of the Los Angeles Department of Transportation (LADOT). Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. As such, the Project would promote the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby reducing vehicular trips and congestion.</p>
<p>Objective 1-3: To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.</p>	<p>Consistent. Implementation of the Project would enhance the surrounding community by providing a high-quality unified development with publicly-accessible pedestrian features, in place of the existing underutilized site containing three separate buildings and associated surface parking areas. The proposed pedestrian features, including a public plaza and a paseo would result in an improved streetscape that would promote pedestrian activity, which would result in an improved quality of the public realm. Also refer to Policy 1-1.2, above.</p>
<p>Policy 1-3.1: Require architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.</p>	<p>Consistent. As described in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to</p>

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site specifically include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the five-story Hotel MdR and associated parking located southwest of the Project Site. The Project would support this objective by developing mixed-use buildings that would be designed in a contemporary architectural style complementary to, and compatible with, the surrounding uses. Therefore, the Project would maintain the character and scale of the surrounding uses.
Commercial	
Policy 2-1.4: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.	Consistent. Refer to the consistency analysis for Policies 1-1.2 and 1-3.1 of this table.
Policy 2-2.2: Require that mixed-use projects and development in pedestrian-oriented areas are developed according to specific design guidelines to achieve a distinctive character and compatibility with surrounding uses.	Consistent. As discussed herein, the Project would be consistent with relevant design guidelines in the Community Plan's Urban Design Chapter, the General Plan Framework's Urban Form and Neighborhood Design Chapter, the Planning Department's Walkability Checklist, and the Citywide Design Guidelines. Therefore, as the Project is consistent with these design guidelines, the Project would achieve a distinctive character and compatibility with surrounding uses.
Objective 2-3: To enhance the appearance of commercial districts. Policy 2-3.1: Require that the design of new development be compatible with adjacent development, community character and scale.	Consistent. Refer to the consistency analysis for Policy 1-3.1.
Public and Institutional Land Use	
Objective 8-1: To provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands. Policy 8-1.1: Review with the Police Department proposals for new development projects and land use changes to determine	Consistent. While this policy refers to LAPD review of new development projects and land use changes, the Project Applicant will consult with the LAPD Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project, as discussed in Section IV.I.2, Public Services—Police Protection, of this Draft EIR. The LAPD was also consulted as part of the preparation of this Draft EIR. Additionally, this Draft EIR will be made available to

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
law enforcement needs and requirements.	the LAPD for its review and comment.
Policy 8-2.2: Ensure adequate lighting around residential, especially multi-family, commercial, and industrial buildings to improve security.	Consistent. The Project would provide adequate lighting around the residential and commercial land uses and outdoor open spaces on the Project Site. As discussed in Section II, Project Description, of this Draft EIR, the Project would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would also be incorporated throughout the Project Site.
Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.	Consistent. The Project includes trees and landscaping features that would be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. In support of this policy, landscaping would be designed not to impede visibility.
Goal 9: Protect the community through a comprehensive fire and life safety program. Policy 9-1.1. Coordinate with the Fire Department the review of significant development projects and General Plan amendments affecting land use to determine the impact on service demands.	Consistent. As discussed in Section IV.I.1, Public Services—Fire Protection, of this Draft EIR, the LAFD Construction Services / Hydrants Unit was consulted in conjunction with the preparation of this Draft EIR.
Transportation Demand Management Strategies	
Goal 11: Encourage alternative modes of transportation over the use of single occupant vehicles (SOV) to reduce vehicular trips.	Consistent. The Project would be located in an area well-served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Specifically, the Project Site is currently served by a total of 12 bus routes. In addition, the Project includes a total of 752 bicycle parking spaces to support the proposed residential and commercial uses. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips.
Non-Motorized Transportation	
<p>Goal 12: A system of safe, efficient and attractive bicycle and pedestrian facilities.</p> <p>Objective 12-2: To promote pedestrian oriented mobility and utilization of the bicycle for commuter, school, recreational use, economic activity and access to transit facilities.</p>	<p>Consistent. The Project includes 752 bicycle parking spaces to support the proposed residential and commercial uses. Also refer to the consistency analysis for Goal 11.</p>
Parking	
<p>Goal 13: A sufficient system of well designed and convenient on-street parking and off-street parking facilities throughout the plan area.</p>	<p>Consistent. While this is a goal of the Community Plan, the Project would provide parking for the proposed uses in accordance with applicable City requirements, including as set forth in the LAMC.</p>
Urban Design	
<i>Multiple Residential</i>	
<p>Building Design</p> <p>The design of all multi-family residential development of five or more units shall be in conformity with the visual pattern of the community. The design should promote harmony in relationship between new and existing buildings, avoid excessive variety and monotonous repetition and be sensitive to the scale, form, height and proportion of surrounding development. To achieve this goal the following policies are proposed:</p> <ol style="list-style-type: none"> 1. The use of articulation, recess, or perforations of surfaces to break up long, flat building facades with varying rooflines. 2. Utilization of complementary building materials, textures and color in building facades. 3. Incorporating varying design to provide definition to each floor and uniformity of detail, scale and proportions. 4. Integrating building fixtures, awnings, security gates or wall/fence into the design of the building. 5. Screening all rooftop equipment and building appurtenances from public view. 6. Requiring decorative masonry walls to 	<p>Consistent. Refer to Policy 1-1.2, above. Also, as described in Section II, Project Description, of this Draft EIR, the proposed mixed-use buildings would be designed in a contemporary architectural style. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, glass railings, and integrated signage and lighting. While not anticipated, should any mechanical equipment be provided on the roof level, such equipment would be screened from view in accordance with City requirements. Additionally, as provided above in Project Design Feature A-6, trash services would be enclosed.</p>

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
enclose trash.	
<p><u>Landscaping</u></p> <p>Open space and proper landscaping are an asset and an essential component of development design. A landscape plan should include the following elements:</p> <ol style="list-style-type: none"> 1. Provide attractive views and visual relief from the building mass. 2. Enhance and complement the building. 3. Buffer other land uses. 4. Include appropriate planting material including trees, shrubbery and flowering plants. 5. Provide useable open space for outdoor activities, especially for children. 	<p>Consistent. The Project would provide a variety of open space and recreational amenities. To enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the publicly-accessible pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site, which would feature a lawn area, seating, and an amenity building. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.</p>
<i>Commercial</i>	
<p><u>Height and Building Design for Pedestrian Areas</u></p> <p>In pedestrian oriented areas, the mass, proportion and scale of all new buildings and remodels shall be at a pedestrian scale.</p> <ol style="list-style-type: none"> 1. The design of all proposed projects shall be articulated to provide variation and visual interest, enhance the streetscape by providing continuity and avoiding opportunities for graffiti. 2. Front facades and facades facing rear parking shall maximize the area devoted to transparent building elements, such as windows and doors. 3. The use of articulations, recesses, surface perforations and other architectural features to break up long, flat building facades. 4. In a Community Center and in Neighborhood Districts, distinctive architectural style/type should be incorporated with building materials and color suitable for the type and design and should be architecturally harmonious. A fine example of a distinctive style in the community is the commercial area at the intersection of National Boulevard and Barrington Avenue which generally reflects the colonial architectural style. This commercial area is proposed for 	<p>Consistent. Refer to Policy 1-1.2, above. Also, as described in Section II, Project Description, of this Draft EIR, the proposed mixed-use buildings would be designed in a contemporary architectural style. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, glass railings, and integrated signage and lighting. The Project Site is not located within a Community Center or Neighborhood District.</p>

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
<p>designation to Neighborhood District. New development in this center should incorporate elements compatible with the colonial architectural theme into exterior design similar to existing buildings.</p>	
<p><u>Height and Building Design for All Commercial Areas</u> Building materials shall be employed to provide relief to bland untreated portions of exterior buildings facades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood and creates a stable environment with a pleasant and desirable character. Accordingly, the following policies are proposed.</p> <ol style="list-style-type: none"> 1. Providing accenting, complementary building materials to building facades. 2. Designating architecturally untreated facades for signage. 3. The use of articulations, recesses, surface perforations and other architectural features to break up long, flat building facades. 4. Screening of mechanical and electrical equipment from public view. 5. Requiring the enclosure of trash areas for all projects. 	<p>Consistent. Refer to Policy 1-1.2, above. Also, as described in Section II, Project Description, of this Draft EIR, the proposed mixed-use buildings would be designed in a contemporary architectural style. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, glass railings, and integrated signage and lighting. While not anticipated, should any mechanical equipment be provided on the roof level, such equipment would be screened from view in accordance with City requirements. Additionally, as provided above in Project Design Feature A-6, trash services would be enclosed.</p>
<p><u>Parking Structures</u> Parking structures shall be integrated with the design of the buildings they serve through:</p> <ol style="list-style-type: none"> 1. Designing parking structure exteriors to match the style, materials and colors of the main building. 2. Maximizing commercial uses on the ground floor. 3. Landscaping to screen parking structures not architecturally integrated with the main building. 4. Utilizing decorative walls and landscaping to buffer residential uses from parking structures. 	<p>Consistent. Parking facilities would be physically and visually integrated within the proposed buildings on the Project Site such that the new parking structures are primarily internal to the Project Site and not visible from surrounding uses.</p>
<p><u>Light and Glare</u> 1. Installing on-site lighting along all pedestrian walkways and vehicular access</p>	<p>Consistent. The Project would provide exterior lighting along driveways, roadways, and pedestrian pathways for safety. All on-site exterior lighting would be automatically</p>

Table IV.G-3 (Continued)
Project Consistency with Applicable Objectives and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
ways. 2. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses.	controlled, where applicable, to illuminate only when necessary and, as set forth above in Project Design Feature AES-PDF-7, would be shielded or directed toward areas to be illuminated.
<hr/> Source: <i>Eyestone Environmental, 2019.</i>	

to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips.

Therefore, based on the above and as discussed in detail in Table IV.G-3 on page IV.G-44, the Project would be consistent with the applicable objectives and policies set forth in the Palms–Mar Vista–Del Rey Community Plan.

(v) Los Angeles Municipal Code

As previously discussed, the Project Site is zoned by the Los Angeles Municipal Code as [Q]M1-1 (Qualified Limited Industrial, Height District 1). The Limited Industrial zone permits a wide array of land uses. Specifically, the M1 zone permits any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. Height District 1 within the M1 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. The Q conditions also establish recycling and graffiti removal requirements for the Project Site.

The Project includes a City-initiated General Plan Amendment to amend the Project Site's land use designation from Limited Manufacturing to General Commercial and a Vesting Zone Change to change the zoning from [Q]M1-1 to (T)(Q)C2-2D. The C2 Zone permits a residential density in accordance with the R4 Zone (400 square feet per unit), which would allow the proposed 658 multi-family units. Therefore, the proposed multi-family use as part of the Project would be permitted with approval of the General Plan

Amendment and Vesting Zone Change. It is also noted that the residential and neighborhood-serving commercial uses proposed by the Project would be consistent with the uses in the Palms–Mar Vista–Del Rey Community Plan area and the residential and commercial uses immediately adjacent to the Project Site.

The Project would construct a mixed-use development that consists of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of restaurant space. The proposed multi-family residential and commercial uses would be provided within three seven-story buildings with a maximum height of 77 feet. In accordance with the requirements of the LAMC, the proposed uses would be supported by 1,217 parking spaces, which would be distributed throughout the Project Site in two subterranean parking levels and in two above-grade parking levels located within each of the three buildings. The Project would include residential lobbies and leasing areas, pools, a spa, and outdoor kitchens with lounges and seating. In addition, per the requirements set forth in the LAMC, the Project would provide approximately 70,175 square feet of open space, including paved plazas with seating, landscaped paseos, and landscaped open space at the ground level that would be privately maintained and publicly accessible. Overall, the Project would remove approximately 100,781 square feet of existing commercial floor area and construct approximately 674,329 square feet of new residential and commercial floor area, resulting in a net increase of 573,548 square feet of net new floor area within the Project Site for a total FAR of approximately 2.6 to 1. Therefore, the Project requires a height district change from Height District 1 to Height District 2D. The proposed “D” limitation would permit a maximum FAR of 3:1 for the entire Project Site, in lieu of the maximum FAR of 6:1 otherwise permitted in Height District 2.

With respect to height, the proposed mid-rise buildings would be compatible with existing mid-rise buildings in the vicinity of the Project Site, including the six-story multi-family Stella apartment complex to the west, the five-story Hotel MdR located southwest of the Project Site, the four-story apartment complex located northeast of the Project Site, and the two-story Marina Marketplace with three-story parking structure located north of the Project Site. Similarly, the proposed FAR for the Project would be consistent with other developments surrounding the Project Site, including the Stella Apartments directly to the west of the Project Site, which was approved in 2009 and completed in 2013 and included a general plan amendment from Industrial–Limited Manufacturing to General Commercial, a zone change from M1 to RAS4 and C4, and a height district change from Height District 1 to Height District 2. Therefore, the Project would be compatible and consistent with the existing mid-rise buildings in the vicinity of the Project Site.

Under the existing [Q]M1-1 zoning, the Project is not required by the LAMC to include front, rear, or side yard setbacks. With the approval of the vesting zone change from the M1 Zone to C2 Zone, no front, rear, or side yard setbacks would be required for

non-residential uses. However, for residential uses, the Project requires a three-foot side yard setback minimum not to exceed 16 feet with an additional one foot for each story over two levels, and a 15-foot rear yard setback not to exceed 20 feet with an additional one foot for each story over the third level. As discussed in Section II, Project Description, of this Draft EIR, Building 1 would be set back at least 43 feet from the property line along Maxella Avenue, which is considered the front yard, and at least 15 feet from the property line on the west (side yard). Building 2 would be set back at least 11 feet from the property line along Maxella Avenue (front yard). Building 2 and Building 3 would be set back at least 15 feet from the property line along Glencoe Avenue (side yard). Building 2 would be set back at least 10 feet from Glencoe Avenue. Building 3 would be set back at least 20 feet from the primary shopping center access driveway located south of the Project Site ingress and egress to Glencoe Avenue. Thus, the Project would comply with all of the applicable setback requirements.

As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, based on the parking requirements set forth in Sections 12.21.A.4.(a), Section 12.21 A.4.(c)(3), and LAMC Section 12.21 A.4.(c)(5) of the LAMC, the Project would require a total of 1,217 parking spaces. As described in Section II, Project Description, of this Draft EIR, the Project would provide a total of 1,217 parking spaces, and, therefore, would comply with the applicable parking requirements of the LAMC. In addition, in accordance with Section 12.21 A.16(a)(2) of the LAMC, the Project includes 752 bicycle parking spaces, including 80 short-term and 672 long-term bicycle parking spaces.

The Project would also meet the requirements set forth in Section 12.21 of the LAMC concerning the provision of on-site open space. Specifically, based on the proposed dwelling unit types, the Project includes at least 70,175 square feet of usable open space and therefore, would comply with the applicable open space requirements for the Project of 70,175 square feet set forth by the LAMC.

In summary, with approval of the requested discretionary actions, the Project would be generally consistent with all applicable provisions of the LAMC.

(vi) City of Los Angeles Coastal Transportation Corridor Specific Plan

The Specific Plan includes purposes applicable to the Project. Specifically, the Project would support the purpose to promote or increase work-related ridesharing and bicycling to reduce peak-hour trips as the Project would provide 752 bicycle parking spaces, including 80 short-term and 672 long-term bicycle parking spaces to help reduce the number of peak-hour trips. In addition, the Project Site includes the development of housing, including affordable housing within proximity to jobs provided on the Project Site and within the Project Site vicinity. Therefore, the Project would be consistent with the applicable purposes outlined in the Specific Plan. The Project would also comply with the

transportation mitigation standards and procedures set forth in Section 5 of the Specific Plan. In particular, as detailed in the Transportation Study included in Appendix M of this Draft EIR, in consultation with LADOT, the Project's traffic analysis has considered the trip generation rates provided in Appendix A of the Specific Plan. The Project's Transportation Study has been reviewed by LADOT and a copy of LADOT's Assessment Letter of the Transportation Study is included in Appendix M of this Draft EIR. Also, as provided in Section IV.J, Transportation/Traffic, of this Draft EIR, and in the Transportation Study, the Project includes mitigation to address the transportation impacts of the Project.

(b) Consistency with Regional Plans

(i) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS)

The Project's general consistency with the applicable goals and principles set forth in the 2016 RTP/SCS is analyzed in Table IV.G-4 on page IV.G-55. As described therein, the Project would be generally consistent with the applicable goals and principles set forth in the 2016–2040 RTP/SCS.

(ii) Regional Comprehensive Plan

The Project's general consistency with the applicable goals and policies set forth in the Regional Comprehensive Plan is analyzed in Table IV.G-5 on page IV.G-58. As described therein, the Project would be generally consistent with the applicable goals and policies set forth in the Regional Comprehensive Plan.

(c) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project would not conflict with or impede either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans. As such, impacts related to land use consistency would be less than significant, and no mitigation measures are required.

Threshold (c): Conflict with any applicable habitat conservation plan or natural community conservation plan.

The Ballona Creek Significant Ecological Area is located approximately 0.5-mile south of the Project Site. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation

Table IV.G-4
**Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/
Sustainable Communities Strategy (2016–2040 RTP/SCS)**

Goals and Principles	Analysis of Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	Consistent. The Project is an infill development located in proximity to public transit and within a designated HQTAs in SCAG's 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within 0.5-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. ¹⁶ The Project is located in proximity to other residential and commercial uses and is in an area that is served by several Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus bus lines and bus stops. In addition, the Project Site is located in the Palms–Mar Vista–Del Rey area, which includes a mature network of roads and freeways that provide local and regional access. The Project would also provide 752 bicycle parking spaces and would site neighborhood-serving commercial (retail/restaurant uses) in proximity to Lincoln Boulevard to promote walking and use of bicycles. Thus, the Project's proximity to a variety of public transit buses, and the availability of non-auto modes of transportation, would allow the Project to maximize mobility and accessibility for residents of the area.
Ensure travel safety and reliability for all people and goods in the region.	Consistent. As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project does not include any hazardous design features that could pose safety issues to travelers. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. Furthermore, during construction, temporary traffic controls, such as flagmen to control traffic movement during temporary traffic flow disruptions, would be provided to direct traffic as required in the work site traffic control plan (refer to Project Design Feature TR-PDF-1 in Section IV.J, Transportation/Traffic, of this Draft EIR). Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.
Preserve and ensure a sustainable regional	Consistent. As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, Project impacts

¹⁶ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.

Table IV.G-4 (Continued)
**Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/
Sustainable Communities Strategy (2016–2040 RTP/SCS)**

Goals and Principles	Analysis of Project Consistency
transportation system.	related to the Los Angeles County Congestion Management Plan, which serves as a monitoring and analytical basis for the regional transportation system, would be less than significant.
Maximize the productivity of our transportation system.	Consistent. The Project would support the use and productivity of the transportation system by concentrating new development within an HQTAs, as discussed above. Refer to the goal to “Maximize mobility and accessibility for all people and goods in the region,” above.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g. bicycling and walking).	Consistent. The Project is located in an area that allows for convenient access to retail, restaurant, and other neighborhood-serving commercial uses, as well as to a variety of public transit buses. The Project's proposed ground floor commercial uses and streetscape improvements would promote walkability in the vicinity of the Project Site. In addition, the Project would provide a total of 752 bicycle parking spaces for the Project's proposed residential and neighborhood-serving commercial uses that would serve to promote the use of bicycles. As discussed in Section II, Project Description, of this Draft EIR, the Project would also include specific design features to further support and promote environmental sustainability. These features consist of compliance with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code and which include energy conservation, water conservation, and waste reduction measures. In addition, as set forth in Project Design Features GHG-PDF-3 and GHG-PDF-4, the Project would also provide electric vehicle charging stations to further promote improved air quality and greenhouse gas mitigation.
Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent. Refer to the goals to “Maximize mobility and accessibility for all people and goods in the region” and “Protect the environment and health of our residents by improving air quality and encouraging active transportation,” above. As discussed therein, the Project is located in an area that allows for convenient access to retail, restaurant, and other neighborhood-serving commercial uses, as well as to a variety of public transit buses, including Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. The Project would also provide 752 bicycle parking spaces and would site neighborhood-serving commercial retail and restaurant uses in proximity to Lincoln Boulevard to promote walking and use of

Table IV.G-4 (Continued)
**Project Consistency with Applicable Goals and Principles of SCAG's Regional Transportation Plan/
Sustainable Communities Strategy (2016–2040 RTP/SCS)**

Goals and Principles	Analysis of Project Consistency
	bicycles.
<hr/> <i>Source: Eyestone Environmental, 2017.</i>	

Plan, or other approved habitat conservation plans apply to the Project Site. **Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan, and no impact would occur.**

d. Cumulative Impacts

(1) Land Use Compatibility

With regard to land use compatibility, there are numerous related projects located within a few blocks of the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. The proposed developments are comprised of a variety of uses, including condominiums, retail, restaurant, residential, hotel and office uses and mixed-use developments incorporating some or all of these elements. Based on the mix of uses and buildings that currently comprise the Community Plan area and Project Site vicinity, as well as the related projects that are proposed, approved, or are under construction, the Project would be compatible with the various existing developments and related projects in the immediate vicinity of the Project Site and surrounding area. In addition, while the Project in combination with the related projects represents a continuing trend of infill development at increased densities, future development, inclusive of the Project, would also serve to modernize the Project Site vicinity and provide sufficient housing and amenities to serve the needs of the growing population. The related projects are not expected to fundamentally alter the existing land use relationships in the community, and as with the Project, the related projects would be required to comply with relevant land use policies and regulations. Furthermore, as analyzed above, the Project's proposed mix of residential and neighborhood-serving retail and restaurant uses, and its building height, massing, and scale, would be compatible with surrounding land uses and properties. **For these reasons, the Project's incremental contribution with respect to land use compatibility would not be cumulatively considerable and the cumulative impact of the Project and the related projects on land use compatibility would be less than significant and no mitigation measures are required.**

Table IV.G-5
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
Land Use and Housing	
<p>Goal: Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy:</p> <ul style="list-style-type: none"> • 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. • Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations. • Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots. 	<p>Consistent. SCAG's 2004 Compass Growth Vision Report identified 2% Strategy Opportunity Areas, which represented areas of the region that were targeted for growth, where projects, plans, and policies consistent with the Compass Blueprint principles would best serve the goals of the Growth Vision. In more recent years, there has been, and continues to be, a significant trend of local development policies and decisions toward increased integration of land use and transportation. In most cases, current adopted local General Plans do not go out as far in time as 2035. Thus, in developing the overall land use development pattern, SCAG identified strategic opportunity areas within city and county boundaries to logically continue recent development trends to 2035. These strategic opportunity areas now incorporate planned HQTAs to a greater extent than currently envisioned in existing local general plans that do not go out to 2035. The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS. The Project would be a mixed-use development, which would include new housing opportunities. The Project would be located in an area well-served by existing public transportation, including Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus bus lines and bus stops to focus growth along major transportation corridors. In addition, the Project would include various publicly accessible pedestrian areas, which would feature seating and planting. Therefore, by focusing new housing opportunities and mixed-use development that would contribute to a walkable and "people-scaled" community in an HQTA, the Project would be consistent with this goal.</p>
<p>Policy LU-6.2: Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.</p>	<p>Consistent. As detailed in Section II, Project Description, of this Draft EIR, the Project's design is based on principles of smart growth and environmental sustainability, as evidenced by its mixed-use composition, emphasis on walkability and public open space, bike-friendly environment, proximity to public transit including bus stops adjacent to the Project Site as described above, and the presence of existing infrastructure needed to serve the proposed uses. The new buildings would be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED® Rating System</p>

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
	<p>for new construction. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). Such features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. Furthermore, the Project would include sustainability features such as the use of LED lighting, use of natural ventilation, use of drought-tolerant plants and indigenous species, use of high-efficiency toilets and shower heads, prohibition of the use of single-pass cooling equipment, installation of pre-treatment stormwater infrastructure, installation of catch basin inserts and screens to provide runoff contaminant removal, use of buildings materials with a minimum 10 percent recycled-content (Project Design Feature SW-PDF-2 included in Section IV.L.3, Utilities and Service Systems—Solid Waste, of this Draft EIR), and implementation of a construction waste management plan to recycle and/or salvage nonhazardous construction debris (Project Design Feature SW-PDF-1) or minimize the generation of construction waste, among others.</p>
Open Space and Habitat	
<p>Policy OSC-10: Developers and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The Project represents an infill development within an existing urbanized area. The Project Site is currently developed with three existing shopping center-related buildings and surface parking. The Project would remove the existing uses and redevelop the Project Site with 658 multi-family residential units and an up to 27,300 square feet of neighborhood-serving commercial uses, including up to 13,650 square feet of retail space and up to 13,650 square feet of restaurant space. The Project is designed to be pedestrian-friendly and promote pedestrian activity on the Project Site and within the surrounding community. Specifically, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Approximately 370 trees</p>

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
	and other landscaping would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment. The Project's pedestrian-friendly design would revitalize the Project Site and surrounding community.
Policy OSC-11: Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	Consistent. As discussed in detail in the consistency analysis for Policy LU-6.2 above, the Project would incorporate "Green" principles into the Project design through energy conservation, water conservation, a pedestrian- and bicycle-friendly site design and waste reduction features.
Policy OSC-12: Developers and local governments should promote water-efficient land use and development.	Consistent. As discussed above in the consistency analysis for Policy LU-6.2, the Project would incorporate water-efficient design features including, but not be limited to: use of drought-tolerant plants and indigenous species, use of high-efficiency toilets and shower heads, and prohibition of the use of single-pass cooling equipment.
Policy OSC-13: Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	Consistent. The Project is a mixed-use development that includes multi-family residential and neighborhood-serving commercial (retail/restaurant) uses. As discussed in detail in Section IV.I.4, Public Services—Parks and Recreation, of this Draft EIR, there are a number of parks and recreational facilities within a 2-mile radius of the Project Site. In addition to the on-site open space and recreational amenities provided by the Project, Project residents would have access to nearby recreational and natural areas.
Water	
Policy WA-11: Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	Consistent. As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, and Section IV.L.2, Utilities and Service Systems—Wastewater of this Draft EIR, LADWP's existing water supply and LASAN's sewer infrastructure would have capacity to serve the Project's estimated water demand.
Policy WA-12: Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	Consistent. The Project's landscape palette would include drought-tolerant plants and indigenous species. Also refer to the consistency analysis for Policy LU-6.2 and OSC-12 for a discussion of water-reduction features.
Policy WA-27: Developers and local governments	Consistent. As discussed in Section IV.F, Hydrology

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</p>	<p>and Water Quality, of this Draft EIR, the Project would introduce new landscaping to the Project Site which would decrease the amount of impervious surface area on-site by approximately 8 percent from 96 percent to 88 percent. Thus, stormwater flows from the Project Site would not increase with implementation of the Project. The Project also would implement BMPs and LID requirements to promote the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. With the implementation of BMPs, the Project would collect, treat, and discharge runoff on-site before discharging into the municipal storm drain system.</p>
<p>Policy WA-32: Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.</p>	<p>Consistent. As discussed in detail in Section IV.M, Energy Conservation and Infrastructure, of this Draft EIR, the Project's water management practices would avoid energy waste. Also refer to the consistency analysis for Policy LU-6.2 and OSC-12.</p>
Energy	
<p>Policy EN-8: Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips. 	<p>Consistent. The Project is a mixed-use, infill development, consisting of residential and commercial (retail/restaurant) uses in proximity to Lincoln Boulevard and other residential and commercial uses in an area that is well-served by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus lines and bus stops. The Project would also provide a total of 752 bicycle parking spaces that would serve to promote the use of bicycles. Therefore, Project residents, employees, and visitors would have convenient access to public transit and opportunities for walking and biking. The Project is designed to be pedestrian-friendly and promote pedestrian activity on the Project Site and within the surrounding community. Specifically, to enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. From here, the pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue to activate these streets and provide a pedestrian-friendly environment.</p>
<p>Policy EN-10: Developers and local governments should integrate green building measures into</p>	<p>Consistent. The Project is designed to integrate green building measures by incorporating features</p>

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Using energy efficient materials in building design, construction, rehabilitation, and retrofit. • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at www.energystar.gov/about/federal_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought-tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity. • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20 percent of their electric load from renewable energy. 	<p>that promote energy conservation, water conservation, and waste reduction. For a detailed discussion, refer to the consistency analysis for Policy LU-6.2.</p>
<p>Policy EN-11: Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project</p>	<p>Consistent. As discussed in Section IV.M, Energy Conservation, of this Draft EIR, LADWP and the Southern California Gas Company were consulted in determining the Project's potential impacts to natural gas and electricity supplies and infrastructure. As discussed therein, existing natural gas and electricity</p>

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
construction should be completed according to the specifications of the energy provider.	supplies and infrastructure would have capacity to serve the Project.
Policy EN-14: Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	Consistent. The Project would be well-served by existing public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. Specifically, the Project Site is currently served by a total of 12 bus routes. In addition, bicycle parking and amenities would be provided throughout the Project Site to encourage alternative modes of transportation to reduce vehicle trips.
Air Quality	
Goal 1: Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.	Consistent. The SCAQMD shares responsibility with the California Air Resources Board for ensuring that all state and federal ambient air quality standards are achieved and maintained throughout all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. In order to meet the state and federal ambient air quality standards, the SCAQMD has adopted an Air Quality Management Plan. The determination of Air Quality Management Plan consistency is primarily concerned with the long-term influence of the Project on air quality in the South Coast Air Basin. The Project would incorporate design features to reduce operational emissions (e.g., increase in diversity and density, limiting the use of natural gas and fired fireplaces, etc.). In addition, the Project would comply with SCAQMD Rule 403 and would implement all feasible measures for the control of particulate matter less than 10 microns (PM ₁₀) and particulate matter less than 2.5 microns (PM _{2.5}). Accordingly, the Project would be consistent with the goals and policies of the AQMP for the control of fugitive dust. The Project's long-term influence would also be consistent with the goals and policies of the Air Quality Management Plan. Therefore, the Project is considered consistent with the SCAQMD's Air Quality Management Plan. Refer to Section IV.B, Air Quality, of this Draft EIR for further discussion of the Air Quality Management Plan.
Goal 2: Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.	Consistent. As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the Project would incorporate sustainable design features to reduce vehicle miles traveled and to reduce potential impacts with respect to greenhouse gas emissions. Also refer to the consistency analysis for Policy LU-6.2.

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>Goal 3: Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM₁₀, PM_{2.5}, ultrafine), and carbon monoxide.</p>	<p>Consistent. Refer to Air Quality Goal 1 above. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate matter, such as truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units, and has provided guidance for analyzing mobile source diesel emissions. Based on this guidance, the Project is not considered to be a substantial source of diesel particulate matter warranting a refined health risk assessment since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery), which would not be a part of the Project. It is expected that quantities of hazardous toxic air contaminants generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. As the Project would not contain substantial toxic air contaminant sources, the Project would not result in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.</p>
<p>Goal 4: Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.</p>	<p>Consistent. As discussed in the consistency analysis for Air Quality Goal 2 and Policy LU-6.2, the Project would incorporate sustainable design features and "Green" principles that would reduce energy-related emissions including water conservation, energy conservation, and waste reduction.</p>
<p>Solid Waste</p>	
<p>Policy SW-14: Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D 	<p>Consistent. As evaluated in Section IV.L.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Project's construction contractor would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills, as required by Project Design Feature SW-PDF-1. In addition, pursuant to Sections 66.32–66.32.5 of the Los Angeles Municipal Code (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the</p>

Table IV.G-5 (Continued)
Project Consistency with Applicable Goals and Policies of SCAG's Regional Comprehensive Plan

Goals and Policies	Project Consistency
<p>waste from landfills to recycling facilities.</p> <ul style="list-style-type: none"> • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through: (1) use of building materials that are more durable and easier to repair and maintain; (2) design to generate less scrap material through dimensional planning; (3) increased recycled content; (4) use of reclaimed building materials; and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. <p>Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	<p>Project to a Certified Construction and Demolition Waste Processing Facility. Thus, the total diversion rate would likely exceed 75 percent. Furthermore, since the Zero Waste LA Franchise System is expected to be in operation in 2017, before the Project is expected to be occupied, operational waste from the Project would likely be diverted at a rate greater than the current Citywide diversion rate of 76 percent. Furthermore, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would provide a designated recycling area for Project residents to facilitate recycling, which would further reduce the Project's waste stream during Project operation.</p>
Transportation	
<p>Goal: A more efficient transportation system that reduces and better manages vehicle activity.</p>	<p>Consistent. See the consistency analysis for Policy EN-8. As discussed therein, the Project would have convenient access to public transit and opportunities for walking and biking, which would reduce vehicle activity.</p>
<p>Source: Eyestone Environmental, 2019.</p>	

(2) Land Use Consistency

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 39 related projects in the vicinity of the Project Site. The related projects generally consist of infill development including retail, restaurant, residential, and office uses. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies, and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively

significant land use impacts. In addition, as discussed above, as the Project would be consistent with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and zoning standards. Therefore, cumulative impacts with regard to land use consistency would be less than significant and would not be cumulatively considerable.

e. Mitigation Measures

Project-level and cumulative impacts with regard to land use would be less than significant. Thus, no mitigation measures would be necessary.

f. Level of Significance After Mitigation

Project-level and cumulative impacts related to land use would be less than significant.