
IV. ENVIRONMENTAL IMPACT ANALYSIS

A. LAND USE

1. ENVIRONMENTAL SETTING

a. Existing Land Use

Existing land uses within and in the vicinity of the Project site include STAPLES Center; the Los Angeles Convention and Exhibition Center; and a mixture of commercial, office, small hotel, medical, wholesale/retail, light industrial, residential uses and surface parking. The Project site will be developed over two areas: the Olympic Properties and the Figueroa Properties, which are further described in Section II.B, Project Location.

(1) Existing Uses on the Project Site

As discussed in Section II.B., Project Location, the Project site is generally located east and west of South Figueroa Street, between Olympic Boulevard on the north and Pico Boulevard on the south. The Olympic Properties encompass a roughly three-block area and the Figueroa Properties encompass a roughly four-block area.

Table 5 on page 89 and the corresponding Figure 15 on page 90 describe the existing land uses within the Olympic Properties and Figueroa Properties. The Olympic Properties are currently occupied exclusively with surface parking lots associated with STAPLES Center (Land Use Nos. 1, 2 and 3 on Figure 15 on page 90 and Table 5). Existing uses on the Figueroa Properties are predominately surface parking lots associated with STAPLES Center; however, several small service/mechanical buildings and a 40,000-square-foot subterranean warehouse occupy a portion of the Figueroa Central development area between 11th and 12th Streets. The Figueroa Properties are summarized as Land Use Nos. 4, 5, 6, and 7 on Figure 15 and Table 5. There are no other permanent buildings, no commercial businesses (other than parking operations), and no residences located on the Project site.

(2) Adjacent Land Uses

Immediately north of the Olympic Properties is a mixture of retail and commercial facilities and residential buildings, including a retail tire store, an automobile service and repair center, medical offices, apartment buildings, other offices (i.e., Salvation Army and the California PTA),

Table 5

EXISTING LAND USES ON PROJECT

Map No.	Address (approx.)	Land Use	Building Description	Parking Spaces
Olympic Properties				
1	940-1112 Olympic	surface parking	STAPLES Parking Lot (#2)	884
2	800-930 Olympic	surface parking	STAPLES Parking Lot (#3)	1,190
3	901-931 Olympic	surface parking	STAPLES Parking Lot (#4)	185
Figueroa Properties				
4	700-790 Olympic	surface parking	STAPLES Parking Lot (#9)	148
5	1143 Flower	commercial/warehouse	service/mechanical buildings	
6	1100-1130 Figueroa	surface parking	STAPLES parking (Lot #6 and 7)	367 (plus 22 bus)
7	1200-1220 Figueroa	surface parking	STAPLES Parking (Lot #5)	475

Source: PCR Services Corporation, December 2000

hotels (i.e., Hotel Figueroa and the Inn Towne Hotel), service/assembly facilities (Salvation Army), and a car wash. This type of mixed land use continues to the north until the downtown high-rise office towers, approximately one-quarter mile to the north, become the prominent land use. Adjacent uses to the Figueroa Properties are the Downtown Holiday Inn Hotel, located on the southeast corner of Olympic Boulevard and Figueroa Street (north of the Figueroa Central development area); the former Family Ford Dealership (now vacant), on the northeast corner of Pico Boulevard and Figueroa Street (south of the Figueroa South Properties), and the Variety Arts Center of Los Angeles, at 940 S. Figueroa Street (north of the Figueroa North development area).

Immediately east of the Figueroa Properties are various wholesale, retail, office, and commercial facilities, along with vacant buildings and surface parking lots, including several clothing stores, a stationery store, and an electronics store. The First Methodist Church, which includes a “Children’s Learning Center,” is located at the southeast corner of Flower Street and Olympic Boulevard. A mixture of commercial uses, apartment buildings, and medical facilities, including the California Hospital Medical Center, are found further south and east. The Metro Blue Line Pico Station is located on Flower Street, north of Pico Boulevard. Mixed commercial, retail and residential uses are located to the south of the Convention Center, and extend south of the Santa Monica Freeway (I-10).

West of the Harbor Freeway (I-110), is the Pico Union neighborhood, a dense mixed use area characterized by wholesale, retail, light industrial, and residential uses. The 10th Street Elementary School is located on the southwest corner of Valencia Street and Olympic Boulevard, across the Harbor Freeway and approximately 1,100 feet west of the Project’s westernmost

Figure 15 Existing Land Uses
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boundary (i.e., Olympic West Properties). Mid-rise apartment buildings are found along Olympic Boulevard between the 10th Street Elementary School and the Harbor Freeway, west of the Project site.

(3) Adjacent STAPLES Center and Los Angeles Convention and Exhibition Center

To the south and west of the Project site are STAPLES Center and the Los Angeles Convention and Exhibition Center facilities (the “Convention Center”). STAPLES Center, a 950,000 square foot sports and entertainment complex, which opened in October 1999, is located at the southwest corner of 11th Street and Figueroa Street. STAPLES Center is the home of the National Hockey League’s *Los Angeles Kings* professional hockey franchise, the National Basketball Association’s *Los Angeles Lakers* and *Los Angeles Clippers* professional basketball franchises, and the Arena Football League’s professional indoor football franchise, the *Los Angeles Avengers*. Besides these major league sporting venues, STAPLES Center hosts a wide range of other events, including family shows, collegiate athletics, premier boxing matches, all-star games, award shows, concerts, entertainment shows, and special events, such as the Democratic National Convention held in August 2000.

The Convention Center initially opened in 1971 with the completion of what is now known as the West Hall. A major expansion of the Convention Center was completed in 1993 with construction of the 347,000 square-foot South Hall. The South Hall is connected to the West Hall by a two-story conference/meeting room area that bridges over Pico Boulevard. The West and South Halls, combined with the smaller Petree, Concourse, and Kentia Halls, provides a total of approximately 870,000 square feet of exhibit hall and meeting room space. The entire facility is located east of the Harbor Freeway on approximately 35-acres bounded by Figueroa Street, Pico Boulevard, Venice Boulevard, and Cherry Street.

Gilbert Lindsay Plaza, a five-acre landscaped pedestrian plaza, is located along South Figueroa Street, immediately east of the Convention Center-West Hall and immediately south of STAPLES Center. This Plaza serves as a gathering place and as a pedestrian entry to the Convention Center-West Hall and as a staging and drop-off area for busses serving STAPLES Center and the Convention Center. Vehicle parking for STAPLES Center and the Convention Center is provided in several on-site parking structures and surface lots within the Project site and at various locations serving the Convention Center. Deliveries and truck access for the Convention Center are provided at the West Hall truck dock on Cherry Street or the South Hall truck dock at Convention Center Drive.

b. Relevant Land Use Plans

The Project is located within the South Park Area of the Central Business District Redevelopment Project Area of the City of Los Angeles. All development activity on-site is subject to the land use regulations of the *Central Business District Redevelopment Plan*, the City's *Central City Community Plan*, and the *City of Los Angeles Zoning Code*. The City's *General Plan Framework*, adopted in December 1996, the *Downtown Strategic Plan* and the *South Park Development Strategies and Design Guidelines* also provide guidance on land use issues relating to area planning and potential site development. The Project site is also located within the six-county planning area of the Southern California Association of Governments (SCAG), the southern California region's federally-designated metropolitan planning organization, which is responsible for preparing the *Regional Comprehensive Plan and Guide (RCPG)* and the *Regional Transportation Plan (RTP)*. The Project site is included within SCAG's City of Los Angeles subregion. The policies contained in each of these plans that pertain to the Project are described below.

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

(1) City of Los Angeles General Plan Framework

The *City of Los Angeles General Plan Framework (General Plan Framework)*, adopted in December 1996, provides current general guidance on land use issues for the entire City. In the Long Range Land Use Diagram for Metro Los Angeles, shown on pages 3-9 of the *General Plan Framework*, the Project site is contained within an area designated as the Downtown Center. Land uses that are encouraged by the *General Plan Framework* on Downtown Center properties include:

- Major visitor and convention facilities.
- Government offices.
- Uses as recommended by the *Downtown Strategic Plan*.
- Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and similar uses.
- Mixed-use structures integrating housing with commercial uses.
- Multi-family housing (independent of commercial).

- Major transit facilities.
- Inclusion of small parks and other community-oriented activity facilities.

General (highway-oriented) commercial uses such as gasoline and automotive service, lumber and building supplies, nurseries, and similar uses are discouraged in the Downtown Center.

As defined in the *General Plan Framework*, the Downtown Center is the "principal government and business center of the region, with a worldwide market. It is intended to be the highest density center of the City and hub of regional transportation."⁸ The Center is intended to provide a significant number of jobs and to include non-work destinations that generate a high volume of trips. Consequently, it is to function as a hub of regional bus lines or rail transit. Typically, a downtown center is a place of high-density development, with physical form substantially differentiated from that of the lower density neighborhoods of the City.

The function, scale, and identity of the Downtown Center distinguish it as a unique place of national and international importance, a primary destination for businesspersons and travelers from around the world. As a goal of the *General Plan Framework*, the Downtown Center should be maintained as the primary economic, governmental, and social focal point of the region. To support this goal, Downtown Center development should reflect a high design standard. Additionally, nighttime uses should be encouraged and public safety enhanced to meet the needs of residents and visitors.

The *General Plan Framework's* objective for the Downtown Center is to provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.

(2) Los Angeles General Plan and Central City Community Plan

The *Los Angeles General Plan (General Plan)* contains objectives, policies, and programs to guide development in Los Angeles for the next twenty years. The City of Los Angeles implements its *General Plan* through Area Community Plans, Specific Plans and *City of Los Angeles Zoning Code (Zoning Code)*,⁹ which regulate uses and the physical size and organization of structures and other spaces.

⁸ *City of Los Angeles, Citywide General Plan Framework, December 11, 1996, page 3.*

⁹ *Los Angeles Municipal Code, Section 12.0, et seq.*

The *Central City Community Plan (Community Plan)* was adopted in 1974, and most recently amended in October 1989. The *Community Plan* states that development in the South Park Area should be people-oriented, focusing on employees, visitors, shoppers and residents. The *Community Plan* designates the South Park Area north of Pico Boulevard as generally High Density Housing and Regional Center Commerce.¹⁰ Regional Center Commerce is not specifically defined in the *Community Plan*, however, this area allows a maximum average floor to area ratio (FAR) of 6:1, and generally encourages the development of large commercial uses, convention-related hotel rooms, new offices, and retail facilities that are oriented to stores serving regional shoppers.¹¹

Relative to uses on the Project site, the *Community Plan* designates all of the Olympic Properties as Regional Center Commerce. For the Figueroa Properties, the *Community Plan* designates the western half as Regional Center Commerce, while the eastern half of the Figueroa Properties is designated for High Density Residential uses. The *Community Plan* allows certain commercial uses in the designated residential areas. The type and intensity of such commercial uses are delineated by [Q] conditions under a Qualified zoning designation.¹² The *Community Plan* is currently being amended, however, the proposed amendment does not affect the designations for the Project site.

The *Community Plan* designates the adjacent STAPLES Center and Los Angeles Convention and Exhibition Center, located south and west of the Project site, as Commercial/Regional Center. The entire Convention Center is designated specifically as a Convention Center use and related Convention Center uses and activities.

(3) City of Los Angeles Zoning Code

The entire Olympic Properties are zoned General Commercial (C2-4D). Properties immediately adjacent to the north and south of the Olympic Properties are also zoned C2-4D, as shown on Figure 16 on page 95. The Harbor Freeway separates the Project site from properties immediately to the west, which are predominantly zoned CM-1 (Commercial Manufacturing). The C2-4D zone and associated height district allows a maximum FAR of 6:1. Various provisions of Zoning Code Section 12.14 (C2 Commercial Zone) allow such specific uses as hotels, restaurants, amusement enterprises, mini-shopping centers, offices, auditoriums and arenas, parking lots and parking buildings.

¹⁰ *Central City Community Plan*, pages CC-3 and CC-4.

¹¹ *Ibid.*, page CC-4.

¹² The symbol [Q] in a zoning designation indicates a qualified classification. This classification places restrictions on the uses of the property and assures development compatible with the surrounding uses.

Figure 16 Existing Zoning

The western half of the Figueroa Properties is zoned General Commercial (C2-4D) and is subject to the same requirements as discussed under Olympic Properties, above. The eastern half of the Figueroa Properties is zoned Qualified Multiple Dwelling ([Q]R5-4D), as shown in Figure 16 on page 95. Adjacent off-site properties to the east of the Figueroa Properties are also zoned [Q]R5-4D. Specified uses allowed under R5-4D zoning include single family dwellings, multiple family dwellings, hotels, museums, hospitals, and parking uses. The Qualified [Q] zoning designation, generally assigned to the central portion of South Park Area, covers approximately 60 acres. This zone designation permits a mixture of residential and commercial uses. This zone generally limits uses to the following:

- Residential uses permitted in the R5 zone;
- Hotels, motels, and apartment hotels;
- Parking buildings, provided such parking is accessory to the main use of the lot or accessory to the main use of another lot not more than 1,500 feet distant therefrom;
- Any other use permitted in the C4 zone within buildings which were in existence on the lot prior to rezoning;
- Any other use permitted in the C4 zone not to exceed 2:1 FAR; and
- Any other use permitted in the C4 zone with an FAR at 2:1 to 6:1, provided that the Planning Commission finds:
 - The proposed development will be desirable to the public convenience or welfare;
 - the proposed development will be in harmony with the objectives and intent of the *Central City Community Plan*;
 - the City Planning Commission and the Community Redevelopment Agency Board have determined that the proposed development conforms to the Redevelopment Plan;
 - the proposed development will not have an adverse impact on existing or planned housing development in the vicinity; and
 - the proposed development will not reduce the potential for future housing development on any other property planned for housing use in the *Central City Community Plan*.

STAPLES Center and the portion of the Los Angeles Convention and Exhibition Center located north of Pico Boulevard are currently zoned General Commercial (C2-4D) and are subject to

the same requirements as discussed under Olympic Properties, above. A conditional use permit was issued by the City for the permitted uses associated with the Convention Center and STAPLES Center to help establish limitations and conditions under which each facility operates.

(4) Central Business District Redevelopment Plan

The *Central Business District (CBD) Redevelopment Plan* was prepared by the Community Redevelopment Agency (CRA) of Los Angeles and adopted in 1975 to provide specific guidance for land use decisions in the CBD Project Area. The *CBD Redevelopment Plan* designates five “Development Areas” within the Central Business District Redevelopment Project Area (“CBD Project Area”) to provide more specific guidance and policies within each development area. The CBD Project Area, shown in Figure 17 on page 98, generally encompasses the downtown area of Los Angeles and is roughly bounded by the Hollywood Freeway (US-101) on the north, Alameda Street on the east, the Santa Monica Freeway (I-10) on the south and the Harbor Freeway (I-110) on the west.

The Project site is located within the South Park Development Area (“South Park Area”), also shown in Figure 17. The South Park Area follows the CBD Project Area boundary on the west and south, and is bounded on the north by 8th Street and on the east by Main Street. Land uses designated for the South Park Area north of Pico Boulevard include public recreation and school sites, high density housing, Regional Center commerce and parking, and open space.

Relevant planning goals and objectives contained in Section 401 of the *CBD Redevelopment Plan* include:

- To assist in the development of Downtown as a major center of Los Angeles metropolitan region, within the context of the *Los Angeles General Plan* as envisioned by the [*General Plan Framework*] and *City-wide Plan* portions thereof.
- To create a climate that will prepare the Central City to accept that share of anticipated regional growth that is economically and functionally attracted to it.
- To organize growth and change, to reinforce viable functions, and to facilitate the renewal or rehabilitation of deteriorated and underutilized areas.
- To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation and housing.
- To create a symbol of pride and identity which gives the Central City a strong image as a major center of the Los Angeles region.

Figure 17 Redevelopment Project Area Boundaries

- To achieve excellence in design, based on how Central City is to be used by people, giving emphasis to parks, green spaces, street trees, and places designed for walking and sitting.
- To provide a full range of employment opportunities for persons of all income levels.
- To establish an atmosphere of cooperation among businesses, special interest groups and public agencies in the implementation of the Plan.

(5) Downtown Strategic Plan

The Los Angeles City Council adopted the *Downtown Strategic Plan* in 1994 to present a comprehensive outline of policies, programs and projects designed to stimulate the renaissance of downtown through 2020. The *Downtown Strategic Plan* serves to advance the regional and citywide policies discussed above with respect to the concentration of activities downtown. The *Downtown Strategic Plan* sets forth focused initiatives that are appropriate to downtown and that are directed toward a more prosperous and equitable future. The *Downtown Strategic Plan* is based on the following strategies:

- Interrelating the three distinct composite areas of downtown; The City, The Center City, and The Markets,¹³ by developing these distinct composite areas of downtown individually and jointly to form a greater whole.
- Providing for continuity and change by taking into account existing problems and opportunities, and blending new construction with the historic fabric of the existing city.
- Eliminating neighborhood isolation by forming linkages to create greater access and more powerful economic interaction.
- Establishing physical frameworks for access, open space, and built form.

The *Downtown Strategic Plan* designates the Project site and the area to south and west as a convention center district. It designates uses to the north and immediately to the east as mixed use,

¹³ These three areas refer to geographic subareas of the downtown area. “The City” refers to the northern and western portions of downtown, including the Civic Center area, Bunker Hill, the “Financial Core” characterized by the area of high rise office building concentration, South Park, and the Convention Center. The “Center City” refers to the central core of the downtown area including the Broadway, Spring Street and Main Street corridors. “The Markets” refers to the eastern portion of downtown, east of Los Angeles Street, and includes Central City East and the garment, produce, and flower market areas.

including residential. Further to the east, uses are designated for primarily residential use. The *Downtown Strategic Plan's* objectives for tourism, specifically with respect to the Convention Center, include the following:

- To restore to Los Angeles its traditional image as a world magnet for tourist activity;
- To address the needs of all the visitors who visit downtown for business, conventions, trade shows and tourism;
- To maintain the Convention Center as the region's preeminent state-of-the-art convention facility;
- To generate a convention center district that links the facility with the surrounding neighborhoods and districts and provides access to the retail and community activities of the Financial Core and South Park;
- To fully develop all streets and parks to accommodate outdoor activities and to provide pedestrian linkages between this district and the rest of Downtown; and
- To provide downtown visitors with convenient access to all of Downtown's retail and visitor-oriented facilities.

One of the strategies specifically recommended by the *Downtown Strategic Plan* to achieve these objectives is to encourage the retention and further development of major sports venues such as Dodger Stadium, the Los Angeles Memorial Coliseum, and Exposition Park, and to promote the location of a National Basketball Association franchise at the center of the city. This strategy was partially fulfilled with the completion of STAPLES Center in October 1999.¹⁴

The *Downtown Strategic Plan* also identifies 16 proposed catalytic projects recommended to directly achieve the primary objectives of the *Downtown Strategic Plan* and to stimulate further actions. One of these proposed catalytic projects identifies the necessity for a convention headquarters hotel near the Convention Center and streetscape improvements to Figueroa Street. According to the *Downtown Strategic Plan*, implementation of this proposed convention hotel would:

- Contribute to the success of the Convention Center as a major, regional economic asset;

¹⁴ The *Downtown Strategic Plan* does not specifically identify STAPLES Center as a major sports venue, since the *Downtown Strategic Plan* was adopted in 1994, prior to the initiation of specific planning for the area. The specific goal of locating a National Basketball Association franchise at the center of the City has been attained.

- Generate activity and income that benefits the whole Downtown, and the City of Los Angeles;
- Showcase the Convention Center district and, therefore, enhance the overall image of Downtown; and
- Serve as a critical link among existing neighborhoods and districts.

(6) Figueroa Corridor Economic Development Strategy

The proposed Project would involve development of various elements that would be related to the *Figueroa Corridor Economic Development Strategy (Corridor Strategy)* that was approved by the Community Redevelopment Agency (CRA) in March 1998 to define a means to improve the Figueroa Street corridor economically and physically, and to reinforce its regional importance.¹⁵ The *Corridor Strategy* sets several objectives for the Corridor to:

- Capture the strengths of the corridor's resources and raise the awareness of the corridor as a vital regional destination for business, education, culture and entertainment;
- Create catalytic places and economic incentives that will stimulate development;
- Reposition Figueroa Street in the transportation network of Los Angeles by rebalancing the street to integrate pedestrian and transportation amenities with vehicular needs appropriate for a major civic boulevard; and
- Reinforce the overall identity of the corridor and the unique character of individual districts.

Further, the *Corridor Strategy* established six districts that focus attention upon the unique attributes of each that: (1) defines the prevailing character; (2) identifies desired anchor uses; (3) establishes design objectives; and (4) defines development priorities within open space and transportation uses. These districts extend along Figueroa Street from Vernon Avenue (Exposition Park) on the south, to Wilshire Boulevard on the north.

The proposed Project is situated within the Downtown Events Center District, which extends from Venice Boulevard (just north of the I-10 Freeway) to 9th Street (James M. Wood Boulevard). Other prominent development within the Downtown Events Center District includes STAPLES

¹⁵ CRA/LA, *Figueroa Corridor Economic Development Strategy-Final Draft*, January 12, 1998, approved by CRA/LA March 5, 1998.

Center, the Convention Center, the Variety Arts Center, California Hospital Medical Center, the Hotel Figueroa, the Downtown Holiday Inn, the Fashion Institute of Design & Merchandising (FIDM), Grand Hope Park and several residential developments.

The *Corridor Strategy* identifies “strategic projects” within each district and also provides a “future vision” to serve as a guide to development planning. Due to the adjacency of the properties within the Downtown Events Center District to STAPLES Center and the Convention Center, strategic projects are identified that “focus on hotels and event- and entertainment-related uses, which are programmed to capture a greater share of expenditures from the corridor’s existing employee, student and visitor base, and to capture a greater share of the regional entertainment market by broadening the area’s appeal.”¹⁶ Further, the *Corridor Strategy* emphasizes the importance of improving the walking experience within the Downtown Events Center District by implementing various strategic projects that establish linkages with the Metro Blue Line Pico Station and other transit facilities within the Figueroa Corridor.

(7) South Park Development Strategies and Design Guidelines

An adjunct to the *CBD Redevelopment Plan* and the *Downtown Strategic Plan* is the *South Park Development Strategies and Design Guidelines (Guidelines)*. These *Guidelines* were jointly prepared by the South Park Task Force and the South Park Stakeholders Group (Stakeholders), with support from the CRA. The Stakeholders represent the diverse interests of South Park Area businesses, residents, and property owners. The Stakeholders’ role is to coordinate community improvement programs, promote general downtown beautification, and address such issues as graffiti removal, litter pick-up, increased security, and marketing. They continue to work with the community to identify community improvement solutions and are seeking to institute a business improvement district. The *Guidelines* establish a basis for the economic, physical, and social development and revitalization of the South Park Area.

The *Guidelines* provide guidance for development in the South Park Area by encouraging the creation of a pedestrian-oriented, live/work community where people live in proximity to their place of work. Strategies for the future development of the South Park Area build upon existing centers of activity and identify linkages by creating prominent streetscape segments that are targeted for improvement. Gateways, which serve as identifiable points-of-entry, leading into the South Park Area, are located to reinforce pedestrian character and express the community’s attributes. Linkage improvements are intended to provide a continuous, pleasant environment for pedestrians and to facilitate connections between South Park’s activity centers and downtown. The *Guidelines* identify the east side of Figueroa Street between Pico Boulevard and 11th Street as a linkage and suggests providing visual enhancements that are complementary to the Convention Center.

¹⁶ *Ibid.*, page 15.

The *Guidelines* identify five key development proposals to stimulate appropriate development within the South Park Area. One of these proposals applies directly to the Project site, while the other four apply to other areas of the South Park Area. “Convention Center North” was proposed for the Olympic Properties portion of the Project site, and conceptually includes: a 20-story, convention-oriented hotel; a convention-supporting hotel facility; a five-story international trade show facility; and parking adjacent to the Harbor Freeway. Convention Center North was envisioned in the *Guidelines* as implementing the *Downtown Strategic Plan's* objectives for enhancing the Convention Center.

(8) Regional Comprehensive Plan and Guide

SCAG's *Regional Comprehensive Plan and Guide (RCPG)* was adopted in 1996 as a policy document that sets broad goals for the southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making. It includes input from each of the 13 subregions that make up the Southern California region (which is comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura Counties). The Project site is within the boundaries of the City of Los Angeles subregion, which encompasses the entire City of Los Angeles.

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

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

- a. Regional Standard of Living
 - Encourage patterns of urban development and land use that reduces costs on infrastructure construction and make better use of existing facilities.
 - Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

b. Regional Quality of Life

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

c. Social, Political, and Cultural Equity

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

d. In addition to the specific land use policies adopted by SCAG, the Regional Mobility Element (RME) of the RCPG, which is SCAG's principal transportation policy, strategy, and objective statement, contains two goals relevant to land use decisions that pertain to the Project:

- Encourage land use development patterns that complement transportation investments.
- Foster land use decisions that encourage alternatives to the automobile.

2. PROJECT IMPACTS

a. Significance Thresholds/Methodologies

The analysis of land use impacts considers both consistency of the project with adopted plans and policies that govern land use on the project site and the compatibility of proposed uses with adjacent land uses.

A significant impact related to land use plan consistency would result if a project were found to be in substantial conflict with either of the following:

- The land use designation set forth by the *Community Plan* or relevant zoning regulations;
- The applicable goals, policies or objectives contained within the *City of Los Angeles General Plan*, the *Community Plan*, *CBD Redevelopment Plan*, regional plans or other adopted City or CRA plans, as identified in Section IV.A.a(1), Relevant Land Use Plans.

A significant impact related to land use compatibility would result if the interface of physical and operational characteristics of the Project were found to be substantially incompatible with the surrounding land use. The determination of compatibility is based upon a survey of land uses in the area, in combination with the analysis of the physical development, construction and operational characteristics of the Project.

b. Analysis of Project Impacts

The Project includes a major convention hotel with a capacity of 1,200 rooms; a second 600-room hotel; up to 1,115,000 square feet of retail/entertainment/restaurant uses, including a 7,000-seat live theater; up to 870,000 square feet of residential uses (approximately 800 dwelling units); up to 300,000 square feet of office space, including medical offices and a sports medicine center; a health/sports club of up to 125,000 square feet; an open-air plaza to feature year-round venues; realignment of a portion of 12th Street; and combined support parking integrally located throughout the Project site.

All necessary Project approvals would be sought from the City, which could include, but are not necessarily limited to the following: (1) approval of a specific plan; (2) discretionary actions for the Olympic North and Figueroa North development areas which may include, without limitation, conditional use permits and variances to allow office, medical offices, retail, wireless telecommunication facilities, parking, and other uses permitted by the zoning, and actions to approve a commercial corner, master liquor licenses, general plan amendment, community plan amendment, site plan review, shared parking, off-site parking, urban design, and any required findings or actions for development within the existing [Q]R5 zoning; (3) other discretionary actions which may include, without limitation, vesting tract maps, lot line adjustments, and other subdivision actions; revocable permits, street vacations and realignments, or other approvals for off-peak or temporary closure of 11th Street between Figueroa and Georgia Streets; (4) a Development Agreement or amendment thereto; (5) an Owner Participation Agreement or a Disposition and Development Agreement or amendment thereto; (6) a Reciprocal Easement Agreement or amendment thereto; and (7) other agreements or actions of the City in furtherance of the Project.

(1) Land Use Consistency

This analysis discusses the Project's consistency with the provisions and requirements of the various policy plans and regulations which govern planning and development in the portion of downtown Los Angeles nearest to the Project.

(a) City of Los Angeles General Plan Framework

The Project would be consistent with the *General Plan Framework's* land use objectives for the Downtown Center by contributing to its identity as a unique place of national and international importance. It would also contribute by providing entertainment and visitor-serving opportunities by achieving the full economic potential of the Convention Center and serve in maintaining the Downtown Center as the social and economic focal point of Los Angeles. The Project is expected to reflect a high design standard and the parking and lighting proposed for the Project site would be consistent with *General Plan Framework* policies relating to encouraging nighttime uses, enhancing public safety, and improving transit access to meet the needs of residents and visitors. Consequently, the Project is consistent with *General Plan Framework* policies related to the Downtown Center and no significant impacts would result.

(b) Los Angeles General Plan and Central City Community Plan

The Regional Center designation established for the Olympic Properties and the western half of the Figueroa Properties corresponds to the hotel, entertainment, retail, restaurant, office, and parking uses proposed at these Development Areas. The high-density residential zone designation for the eastern half of the Figueroa Properties allows certain commercial uses controlled by zoning Q conditions. The Q classification for the Figueroa Properties permits the proposed residential and hotel development that is anticipated for the Figueroa Central and Figueroa South Development Areas. In support of the adjacent STAPLES Center and the Convention Center designation as Commercial/Regional Center, the Project's related uses and activities will serve downtown visitors with a convention hotel and related entertainment and retail activities, and will promote expansion of the Convention Center to accommodate and hold large national conventions.

Project development standards and urban design character would be governed by a proposed specific plan that would allow a distribution of approved uses as proposed by the Project. The proposed specific plan would be consistent with the limitations of the *Community Plan* that allows a maximum 6:1 FAR over the majority of the Project site. The Project would be consistent with the goals and policies of the *Community Plan* by promoting the Central City as a concentrated center of high-intensity urban activities, including entertainment, residential, commercial, cultural, recreational, and appropriate industrial uses. The Project would not create significant impacts with regard to consistency with the *Los Angeles General Plan* or the *Central City Community Plan*.

(c) **City of Los Angeles Zoning Code**

All of the Olympic Properties are zoned General Commercial (C2-4D). This commercial zone and associated height district allows a maximum FAR of 6.0. The hotel, retail, restaurant, entertainment, Convention Center expansion, and parking structure uses proposed for the Olympic Properties are consistent with existing zone designations, but at a substantially lower overall density. The Olympic West Properties, adjacent to the Harbor Freeway, would be developed within the permitted building height and massing with a proposed FAR of 1.5. This subarea would have a height overlay of 100 feet above grade, with a supplemental height limitation to 150-foot above grade over 25 percent of this subarea. The Olympic East Properties would be developed to the maximum permissible FAR of 6.0, with a height overlay of 175 feet above grade and a supplemental height limitation of up to 600 feet over 15 percent of the subarea. The supplemental height or “tower” portion of the Olympic East Properties would be located on the northwest corner of the subject property and would accommodate the proposed convention hotel. This location also would accommodate a portion of the urban entertainment uses proposed for the Project. The proposed Central Plaza, providing open space and the main visual focal point for the Project, would also be located in this portion of the Project site. Development of the Olympic North Properties would include office uses, possibly related to sports medicine. The proposed development would be within a FAR of 3.0, which translates into a height overlay of 90 feet above grade and a supplemental height limitation of up to 200 feet above grade over 60 percent of the subarea.

The western half of the Figueroa Properties is zoned General Commercial (C2-4D), which allows development to occur up to a maximum 6.0 FAR. The eastern half of the Figueroa Properties is zoned Qualified Multiple Dwelling ([Q]R5-4D). Specified uses allowed under R5-4D zoning include single family dwellings, multiple family dwellings, hotels, museums, hospitals, and parking uses. The hotel, office, residential, and parking structure uses proposed for the Figueroa Properties are consistent with existing zone designations also at a lower density than the maximum allowed. The development proposed for the Figueroa Central Properties shall not exceed a FAR of 6.0, and allow development with a height overlay of 100 feet above grade with a supplemental height limitation up to 350 feet over 25 percent of the subarea and 450 feet over 10 percent of the subarea. The Figueroa South Properties would also be developed within a FAR of 6.0 with a height overlay of 100 feet above grade and a supplemental height limitation up to 350 feet over 20 percent of the subarea. The Figueroa North Properties would accommodate office, retail and restaurant uses, with structured parking. The proposed development would not exceed a FAR of 3.0, with a height overlay of 90 feet above grade and a supplemental height limitation up to 350 feet over 60 percent of the subarea.

The development of the Project would represent FARs between 1.5 and 6.0, all within the maximum 6.0 FAR allowed by the City for the Project site. As a result, the Project would be well within the height district limitations and allowable densities associated with this commercial zone as determined by the *Zoning Code*. Therefore, the height and bulk of the Project is below the

allowable maximum height and bulk of buildings under existing zoning and *CBD Redevelopment Plan* and *Downtown Strategic Plan* standards for proposed development, and no significant impact related to zoning would occur.

(d) Central Business District Redevelopment Plan.

The Project would be consistent with the *CBD Redevelopment Plan* by serving to implement several relevant goals and objectives, such as:

- Assisting in the development of Downtown as a major center of the Los Angeles metropolitan region;
- Contributing to the creation of a climate for regional growth;
- Facilitating the renewal of deteriorated and underutilized areas;
- Contributing to a modern, efficient and balanced urban environment for people by providing a range of entertainment, recreational, commercial and retail uses, including a full range of around-the-clock activities and uses, such as recreation and housing; and
- Providing a full range of employment opportunities for persons of all income levels.

Replacement of the existing interim parking and minor warehouse activities with uses that enhance the utilization of the Convention Center and STAPLES Center is consistent with the long-term vision for development in the South Park Area of the CBD Redevelopment Project Area. The Project is consistent with the land uses designated for the South Park Area north of Pico Boulevard, as it would provide a vibrant combination of hotels, residential, entertainment, restaurant, and retail uses in an area that has deteriorated because of neglect and poor maintenance. The Project would not conflict with the goals and objectives of the *CBD Redevelopment Plan*. Therefore, the Project would not create significant impacts with regard to consistency with the *CBD Redevelopment Plan*.

(e) Downtown Strategic Plan

The development of the Project would serve to implement several *Downtown Strategic Plan* objectives by renewing the traditional image of Los Angeles as a world magnet for tourist activity, providing downtown visitors with convenient access to retail and visitor-oriented facilities, and enhancing the perception of the Convention Center district as the region's preeminent state-of-the-art convention facility.

The Project is the type of catalytic project that would stimulate the downtown area, and provide support for other projects that are envisioned in the *Downtown Strategic Plan*. The Project would be consistent with the objective of the *Downtown Strategic Plan* by:

- Generating activity and income benefiting the whole of Downtown, and the City of Los Angeles;
- Showcasing the Convention Center district including STAPLES Center and, therefore enhancing the overall image of Downtown; and
- Serving to link existing neighborhoods and districts through the Downtown rail transit and other public transit.

The Project would also be consistent with the *Downtown Strategic Plan's* recommendation to provide entertainment, shopping, and other tourist attractions near the Convention Center to ensure a supportive environment for that facility. The Project is therefore consistent with the objectives of the *Downtown Strategic Plan*. The Project would not create significant impacts in regards to consistency with the *Downtown Strategic Plan*.

(f) South Park Development Strategies and Design Guidelines

Development of the Project would serve to implement the goals contained in the *Guidelines*. As discussed above, the Project would serve to fulfill the *Downtown Strategic Plan's* objectives for the Convention Center area, which is also an objective of the *Guidelines*. As discussed in Section IV.C, Population, Housing and Employment, of this Draft EIR, the Project is expected to increase area employment by providing an estimated 5,367 jobs, many of which could be filled by current area residents. Consequently, the Project would be consistent with the *Guidelines'* objective of creating a pedestrian-oriented, live/work community, in which people live in varying degrees of proximity to their place of work and with the *Guidelines'* strategy to build on an existing center of activity in South Park, near the Metro Blue Line Pico Station (designated in the *Guidelines* as an activity center).

The Project is also expected to stimulate other development within the South Park Area by encouraging economic investment in the area and achieving a quality urban design that uses unifying design elements, improvement of pedestrian areas and addition of landscaping. Project design features would also be consistent with the *Guidelines* through implementation of pedestrian linkages at Figueroa Street and 12th Street, across 11th Street to connect the proposed convention hotel with STAPLES Center and the Convention Center, and between the Figueroa Properties and the Metro Blue Line-Pico Station. The Project, therefore, is consistent with the goals of the *Guidelines*. The Project would not create significant impacts in regards to consistency with the *Guidelines*.

(g) Figueroa Corridor Economic Development Strategy

The proposed Project would serve to implement the hotel and entertainment objectives contained within the *Corridor Strategy*. In addition, the proposed residential and complementary retail and office uses within the proposed Project would establish the desired pedestrian linkages consistent with the objective to improve the walking experience within the Downtown Events Center District.

The proposed Project would also help to stimulate development and economic growth that is desired within the Downtown Events Center District as well as within the South Park Area. The Project would provide the desired convention hotel and residential land uses that would promote related growth opportunities for the Convention Center and establish a focal point for special events within the Figueroa Corridor. The proposed Project also contains an integrated streetscape plan as described in Section II.C, Project Characteristics, which would be implemented by the proposed specific plan that would define design features in accordance with the *Corridor Strategy's* Corridor Enhancement Plan. The Project, therefore, is consistent with the goals of the *Corridor Strategy*. The Project would not create significant impacts in regards to consistency with the *Corridor Strategy*.

(h) SCAG Regional Comprehensive Plan and Guide

Implementation of the Project involves the redevelopment of existing parking areas related to the operation of STAPLES Center. This type of infill development serves to implement several SCAG policies including, but not limited to:

- Maximizing the use of existing urbanized areas accessible to transit through infill and redevelopment;
- Potentially increasing public transit use by concentrating employment opportunities;
- Minimizing the need for new infrastructure;
- Implementing redevelopment in and around an activity center and in an area needing recycling and redevelopment; and
- Encouraging local job development.

The Project site is adjacent to the Metro Rail Blue Line-Pico Station. Metro Rail connections can be made from the Blue Line to the Red Line at the Metro Center Station (7th and Flower Streets), and to Los Angeles International Airport, via the Green Line. The Red Line now directly serves mid-Wilshire, Hollywood, North Hollywood, and Union Station, where it connects

with regional rail (Metrolink), interstate rail (Amtrak), and bus transit. Future employees and visitors to the Project can utilize these transit options.

Employment growth directly attributable to the Project will have a significant positive impact on employment in the Central City Area, and will assist in the recovery of downtown Los Angeles, which has been in decline since the recession of the 1990's. As referenced in Section IV.C., Housing, Population, and Employment, the Project is expected to provide approximately 800 new residential units and an estimated 5,367 full-time jobs (includes an estimated 24 existing jobs), which are well within the established growth parameters of both the Central City Area and the Los Angeles subregion as a whole. Accordingly, the Project's effects upon population and housing are considered to be neither adverse nor significant, and the Project appropriately implements the regional policies for the area.

No major new infrastructure facilities would be needed to service the site. Any necessary relocation of, or improvements to, existing infrastructure would enlarge the already extensively developed infrastructure in this area and would be consistent with the SCAG policy of maximizing use of existing urbanized areas through infill and redevelopment.

In addition, as a source of entertainment and a potential tourist attraction, the Project would attract activity to the Convention Center and the downtown area and serve as a catalyst for additional commercial redevelopment in the South Park Area. Moreover, the location of the Convention Center and adjacent Metro Blue Line would encourage expanded transit usage. Consequently, the Project would be consistent with SCAG urban development policy objectives. In response to the Notice of Preparation (NOP) circulated by the City of Los Angeles as part of the Project's environmental review process, SCAG submitted written comments dated September 18, 2000 (included in Appendix A of this Draft EIR). In the NOP comment letter, SCAG identified the *RCPG* policies it considers relevant to the Project. Table 6 on page 113 provides an analysis of Project consistency with these policies.

Based on the analysis of Project consistency with SCAG's *RCPG* policies provided in Table 6, the Project would be consistent with the *RCPG*.

(2) Land Use Compatibility

The Project's operational compatibility with STAPLES Center, the Convention Center, and the other immediately adjacent land uses are discussed below.

Implementation of the Project would involve the relocation of portions of the existing surface parking for STAPLES Center to integrated parking structures that will be located throughout the Project site. Existing activities and scheduled events at STAPLES Center and the Convention

Center may experience short-term disruption during construction. However, the Applicant intends to build a parking structure on the Olympic West Properties to serve existing STAPLES Center parking which currently utilizes parking lots located throughout the Olympic and Figueroa Properties. Further, the Applicant would have this parking structure developed prior to development of the other Olympic Properties, thus minimizing any anticipated impacts from parking disruption. Refer to Section V.F.2, Parking, for further analysis of potential parking impacts.

The Project would also address the proposed expansion plans for the Convention Center (also see discussion in Section III.B, Cumulative Development). Convention Center management has identified the southern portion of the Olympic West development Area as the preferred site, which, together with existing Convention Center property, would allow for a future addition of approximately 250,000 square feet of exhibit/meeting area and Convention Center parking. The Applicant has consented to reserve this portion of the Olympic West Properties as a “holding area” for future Convention Center expansion. This portion of the Project site would remain as surface parking within a reasonable period of time, although the area may be used for construction staging during development of the Project. Thereafter, the Applicant may elect to re-assign otherwise approved uses within the Project site to this holding area, as permitted by the proposed specific plan and approved Equivalency Program (see Section II.B, Project Characteristics). Therefore, the Project is compatible with the plans to accommodate the proposed Convention Center expansion.

The Project, like STAPLES Center and the existing Convention Center, would be a major visitor-serving facility that would attract large numbers of visitors and serve existing visitors, workers, and residents already located in downtown. The Project would also provide a focal point for downtown entertainment, dining, and retail opportunities; introduce the opportunity for a medium-high density downtown living experience; enhance the streetscape and pedestrian environment; and realize the full economic potential of the downtown area through development of a convention hotel. The Project would provide a supportive environment for visitors to the Los Angeles Convention and Exhibition Center and downtown. The increase in visitors to the area would also be generally supportive of tourist and commercial activities now occurring within the downtown area, including many surrounding properties. Events at STAPLES Center, the Convention Center, and within the Project usually occur at staggered times throughout the day. However, the potential for event schedules to overlap does exist, especially when events at all venues coincide on the same weekend. Also, the departure of weekday STAPLES Center and Convention Center patrons may occasionally coincide with the arrival of evening Project patrons during weekdays. The activity levels associated with individual and simultaneous events within and adjacent to the Project, while some patrons and surrounding land owners and tenants object, are commonplace within major entertainment and convention venues, as proposed for the Project site by all relevant land use plans.

Table 6

ANALYSIS OF PROJECT CONSISTENCY WITH SCAG RCPG POLICIES

Relevant Policy ^a	Analysis of Project Consistency
Growth Management Chapter	
3.01 The population, housing and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	The analysis of population, housing, and jobs forecasts for the Project uses SCAG's current <i>Regional Transportation Plan (RTP)</i> projections. The Project is located within the City of Los Angeles subregion. Project-generated population, housing, and employment growth is within SCAG's forecasts for this subregion. Refer to Section IV.C, Population, Housing, and Employment, for further discussion of this issue.
3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.	Development of the Project would occur incrementally over an approximately seven-year period. The project also includes infrastructure provisions for connecting to existing utility systems. In addition, the proposed roadway modifications would improve on-site circulation and support alternative/public transportation systems. The project would not include public facilities, although security measures and fire protection devices would be implemented on-site. As noted in Section IV.C, Population, Housing and Employment, the Project is consistent with regional growth projections, and actually provides beneficial uses to this part of downtown.
3.05 Encourage patterns of urban development and land use that reduces costs on infrastructure construction and make better use of existing facilities.	Refer to the response to Policy 3.03. The proposed Project entails revitalization and redevelopment of an older mixed residential/light industrial area served by existing public facilities and infrastructure. Wherever possible, the project would utilize and/or improve the existing infrastructure systems. The project would concentrate a mix of mutually supportive land uses, including residential, hotel, retail, restaurant, commercial, office, and entertainment uses.
3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	The proposed Project would address on-site public infrastructure improvements, the installation of which would expand upon existing facilities and facilitate public service delivery to the Project site. In addition, the Project is located within the South Park Redevelopment Project Area and would support the Community Redevelopment Agency's redevelopment efforts.
3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.	This policy pertains to the activities of local jurisdictions that are beyond the focus of individual development projects. However, Project implementation would boost economic vitality in the area by encouraging new private sector investment and would contribute to the diversification of the area's employment base through the expansion of hotel and entertainment uses, while encouraging convention-related businesses and the expansion of the Convention Center to enable it to compete on a global scale to attract larger conventions and events.
3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway	The Project would concentrate a mix of mutually supportive land uses near an existing network of roadways, freeways, and transit corridors. Patron amenities to be provided on-site would encourage use of facilities and reduce the need for multiple vehicle trips. Project-generated employment would provide opportunities for local residents to reduce commute times and/or

Table 6 (Continued)

ANALYSIS OF PROJECT CONSISTENCY WITH SCAG RCPG POLICIES

Relevant Policy ^a	Analysis of Project Consistency
expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.	walk, bike or take transit to work. However, as discussed in Section IV.F, Transportation/Circulation, the projected increase in the on-site population would result in an increase in the number of vehicle trips to/from the Project site and an associated increase in vehicle miles traveled.
3.13 Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	The Project entails the fulfillment of revitalization and redevelopment objectives for an area in the City of Los Angeles that is designated Regional Center. The project site would continue to be served by the MTA bus and LADOT shuttle service (DASH, local and regional lines), MTA Blue Line rail service and various other regional bus lines. Direct transfers to the MTA Red Line provide frequent service to Union Station and Hollywood and also permit convenient access to Metrolink commuter rail and Amtrak's regional/national rail service from Union Station. All of these interconnections would also be available for Project employees and visitors.
3.14 Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.	Implementation of the proposed Project would increase the density of development on a site located within the Downtown Events Center, as designated by the <i>Figueroa Corridor Plan</i> , which is well served by public transit systems, including rail, bus, and shuttle services, as discussed in the response to Policy 3.13.
3.15 Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.	The Project would concentrate a mix of mutually supportive land uses, including hotel, retail, restaurant, entertainment, office, and residential uses near existing public facilities, infrastructure, and transit corridors. As discussed above in response to Policy 3.13, the site is well served by public transit systems, including rail, bus, and shuttle services.
3.16 Encourage development in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	The Project facilitates the fulfillment of revitalization and redevelopment objectives for an area in the City of Los Angeles that is designated Regional Center. The Project site would encourage development in the Downtown Events Center, an identified activity center, as designated by the <i>Figueroa Corridor Plan</i> . As discussed above, existing public facilities, infrastructure, and transportation corridors serve the Project site. Existing commercial, entertainment and residential uses also surround the Project site.
3.17 Support and encourage settlement patterns which contain a range of urban densities.	The Project includes 800 residential units within close proximity to the commercial center of downtown Los Angeles. Project implementation would result in an increased density of development in a currently underutilized area where current trends and approved planning objectives of the City of Los Angeles encourage similar development. Surrounding land uses include commercial, underutilized light industrial and residential development of varying densities, which are regulated by local ordinances and planning policies.
3.18 Encourage planned development in locations least likely to cause environmental impact.	The Project entails the conversion of surface parking lot and redevelopment within an older, urbanized, and underutilized area of downtown Los Angeles. Project uses would be generally more intrusive in terms of noise, odors, and light than the existing parking lot uses located on-site. Although residential properties are located adjacent to the site, the development of more desirable commercial uses and the associated project operations would be consistent with current development objectives and site zoning and would result in four

Table 6 (Continued)

ANALYSIS OF PROJECT CONSISTENCY WITH SCAG RCPG POLICIES

Relevant Policy ^a	Analysis of Project Consistency
	significant impacts. Current remediation activities of existing hazardous conditions on-site are currently underway and will be completed prior to beginning Project construction on the affected site.
3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.	Archaeological and paleontological resources are not known to exist within the project area. However, if encountered during excavation and grading activities, any discovery of such resources would be treated in accordance with state and federal guidelines for disclosure, recovery, and preservation, as appropriate. New construction adjacent to the historic Variety Arts Center would be complementary and compatible in design in accordance with the City of Los Angeles' standards. Refer to Section IV.L, Historic Resources, for project design features and mitigation measures proposed in conjunction with these activities.
3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.	The Project site does not contain any steep slopes or high fire risks. Drainage from the Project site is channeled through the Pico Boulevard Drain and the Cherry Street Drain to Ballona Creek. These drains are capable of accommodating the majority of storm water associated with a 100-year storm event without damaging consequences. In addition, as discussed in Section IV.K, Geologic and Seismic Hazards, the Project would meet seismic safety standards, and mitigation measures are recommended to reduce any seismic risks to acceptable levels.
3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.	Refer to Sections IV.K, Geologic and Seismic Hazards, and IV.H, Noise, for analyses of potential Project impacts and associated mitigation measures aimed at reducing such impacts. As discussed in Section IV.I.2, Police, the Project would also include a crisis management plan to aid in the evacuation of the site and facilitate emergency response.
3.24 Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.	This policy pertains to the activities of local jurisdictions and is beyond the focus of individual development projects. However, Project would include 800 residential units of which 20 percent (160 units) would qualify as being affordable and would be provided either onsite or offsite within the affected area. Refer to Section IV.C, Population, Housing, and Employment.
3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services, such as: public education, housing, health care, child care, social services, recreational	The Project would concentrate a mix of mutually supportive land uses, including hotel, retail, restaurant, entertainment, office, and residential uses in the downtown area, which provide good access to public services.

Table 6 (Continued)

ANALYSIS OF PROJECT CONSISTENCY WITH SCAG RCPG POLICIES

Relevant Policy ^a	Analysis of Project Consistency
facilities, law enforcement, and fire protection.	
Air Quality Chapter	
5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community-based shuttle services, provision of demand management based programs, or VMT/emission fees) so that options to command and control regulations can be assessed.	As discussed above in response to Policy 3.13, the Project site is well served by public transit systems, including rail, bus, and shuttle services. Roadway modifications proposed as part of the project would support these alternative/public transportation systems, improve on-site circulation, and complement transportation improvements currently planned by the City of Los Angeles Department of Transportation. The Project would also include a comprehensive TDM program intended to address the transportation needs of future employees. Please refer to Section IV.E, Air Quality, for further discussion of emissions reduction strategies.
5.11 Through its environmental document review process, SCAG should help ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.	This policy pertains to the activities of SCAG that are beyond the focus of individual development projects. However, Sections IV.E, Air Quality, IV.F, Transportation/Circulation, and this Section IV.A, Land Use, include analyses of project consistency with applicable local, county, regional, air basin, and state policies. Many of these plans and policies support a multi-disciplinary approach that incorporates air quality, land use, transportation, and economic relationships (e.g., MTA's CMP, SCAG's RCPG, and SCAQMD's AQMP). As part of the project evaluations, mitigation measures are recommended to minimize potential impacts and/or conflicts.
Water Quality Chapter	
11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.	This policy pertains more to the activities of local jurisdictions or regional entities than to the Project. Reclaimed water is not currently available at the Project site. If reclaimed water is made available in the future, the Applicant shall connect to the system and use reclaimed water on-site for landscape irrigation and other purposes, as appropriate.
^a Relevant policies have been excerpted directly from SCAG's Regional Comprehensive Plan and Guide. However, the policy numbers listed correspond with those provided in SCAG's NOP comment letter dated September 18, 2000, which is included in Appendix A of this Draft EIR. Source: PCR Services Corporation, December 2000.	

The Project includes the creation of an open-air plaza which would serve to link the convention hotel, to be located on the Olympic East Development Area, past various retail and restaurant uses, and across 11th Street to STAPLES Center and the Convention Center. The plaza would create synergy between continuing activities at STAPLES Center, the Convention Center, and the general downtown area. The plaza would become a community focal point and would also

serve as a venue for special events and city-wide celebrations. The Project would also act to increase public use of Gilbert Lindsay Plaza and Figueroa Street by encouraging pedestrian activity in areas around STAPLES Center and the Convention Center. This combination of outdoor activities with other proposed entertainment, retail, and restaurant uses would be designed to create linkages between uses, as well as to adjacent development areas within the surrounding community.

Overall, the Project would combine with existing adjacent land uses to create a well-designed, modern, efficient, and balanced urban environment; including a full range of day and nighttime activities and uses that is desired and encouraged in order to achieve the long term realization of development strategies for this area of downtown. Therefore, the Project would be compatible with the majority of surrounding land uses.

3. MITIGATION MEASURES

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

4. ADVERSE EFFECTS

The Project would be consistent with the *General Plan* land use designations, as implemented by the *Central City Community Plan*, for the site with the procurement of a specific plan, a general plan amendment to reference the specific plan, and other discretionary entitlements which may include a CUP for the sale of alcohol in connection with the proposed Project hotels, restaurant and entertainment uses, and potentially for the location of wireless communications equipment. The Project would also be consistent with relevant land use policies contained in the *CBD Redevelopment Plan*, *Downtown Strategic Plan*, the *South Park Design Guidelines*, the City's *General Plan Framework*, and the *SCAG RCPG*. Therefore, no significant impacts to land use compatibility and consistency with existing land use regulations are anticipated by the implementation of the Project.

5. CUMULATIVE IMPACTS

The Project would implement important local and regional goals and policies for the immediate Project area, which would assist the City of Los Angeles in achieving short- and long-term planning goals and objectives for the area. In general, these plans recognize an urban infill and intensification of existing uses and redevelopment of the existing commercial, retail, entertainment and hotel uses in the area, while preserving and improving the neighboring South Park Area

community character. Related projects under consideration in the surrounding area include land uses and densities which would implement and support important local and regional planning goals and policies as well. Therefore, no significant cumulative land use impacts are anticipated.