

3. SCEA CRITERIA AND TRANSIT PRIORITY PROJECT CONSISTENCY ANALYSIS

Project Consistency with the Transit Priority Project Criteria

As discussed in Section 1 (Introduction), a Sustainable Communities Environmental Assessment (SCEA) may be prepared for a project that (a) is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy (see California Public Resources Code Section 21155(a) and (b) is a “transit priority project” (as defined in California Public Resources Code Section 21155(b)). As further described below, the Project meets these criteria and thus, is eligible for certain CEQA streamlining benefits by way of preparing a SCEA for purposes of clearance under the California Environmental Quality Act (CEQA).

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the California Air Resources Board (CARB) has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented achieve the greenhouse gas emission reduction targets established by CARB;
2. Is a TPP in that the project meets the following criteria:
 - a. Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
 - b. Provides a minimum net density of at least 20 units per acre; and
 - c. Is located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

Consistency with Criterion #1 – The Project is consistent with the general use designation, density, and building intensity and applicable policies of specified for the project area in either a sustainable communities strategy or an alternative planning strategy.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the Project area, and the applicable “sustainable communities strategy” is SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), adopted on April 7, 2016.

The Project is consistent with the General Use Designation, Density, and Building Intensity

The Project is consistent with the general land use designation, density, and building intensity in the SCAG 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS balances Southern California’s regional future mobility and housing needs with economic, environmental and public health goals. For the SCAG region, CARB has set greenhouse gas reduction targets to eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. On June 28, 2016, CARB accepted SCAG’s

quantification of GHG emission reductions from the 2016-2040 RTP/SCS and determined that the 2016-2040 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets and thus, met the criteria to be a sustainable communities strategy.

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban, compact, or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016-2040 RTP/SCS, pp. 20-21.)

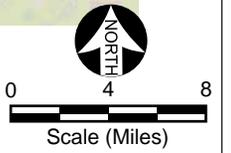
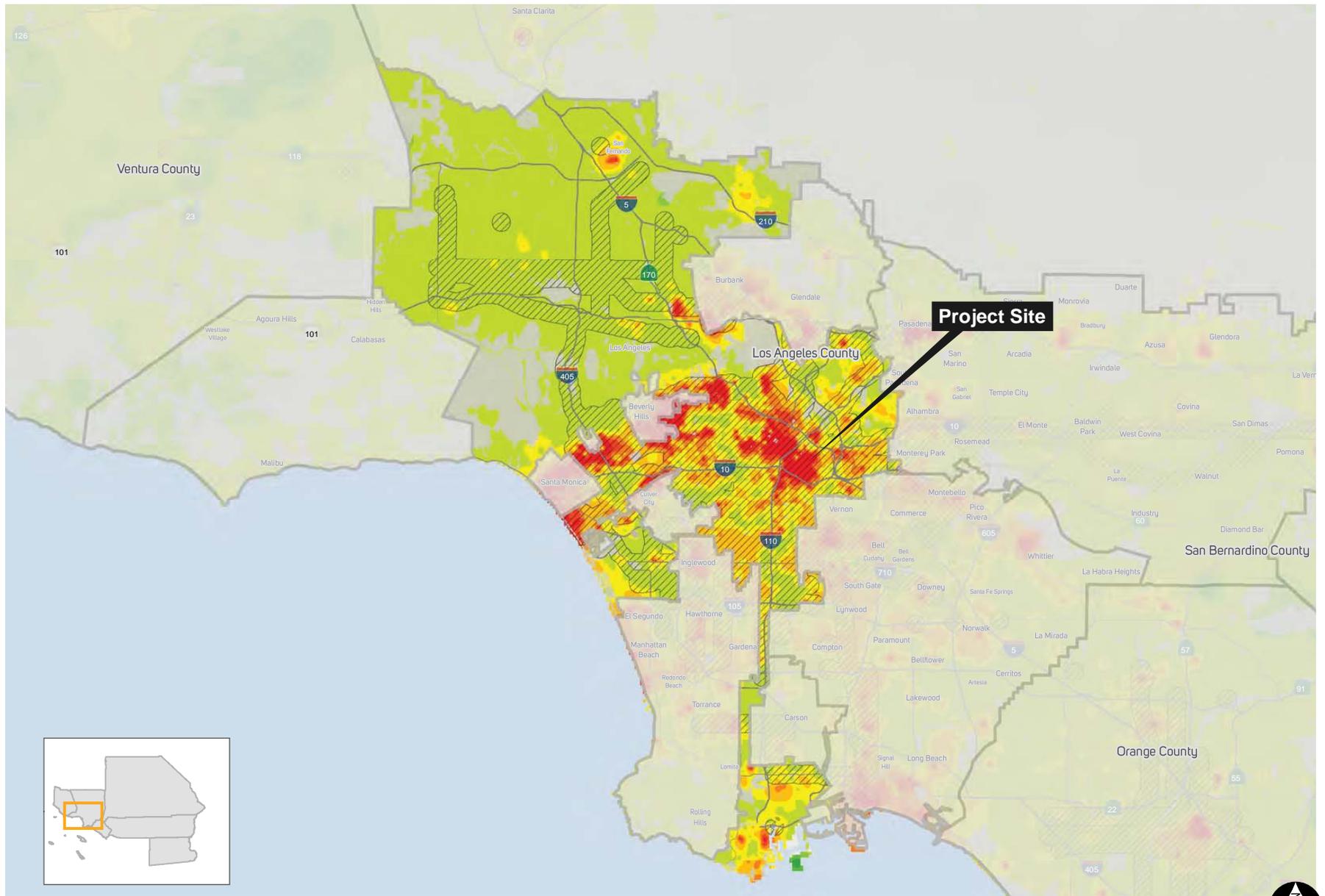
The Project Sites are located in an area that is within an “Urban” Land Development Category (LDC) – the highest density and most intense land development category assessed in the 2016-2040 RTP/SCS (refer to Figure 3-1 and Figure 3-2).

The 2016-2040 RTP/SCS describes the Urban LDC as follows:

These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.(page 20)

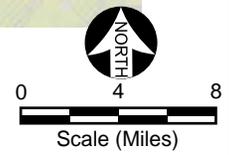
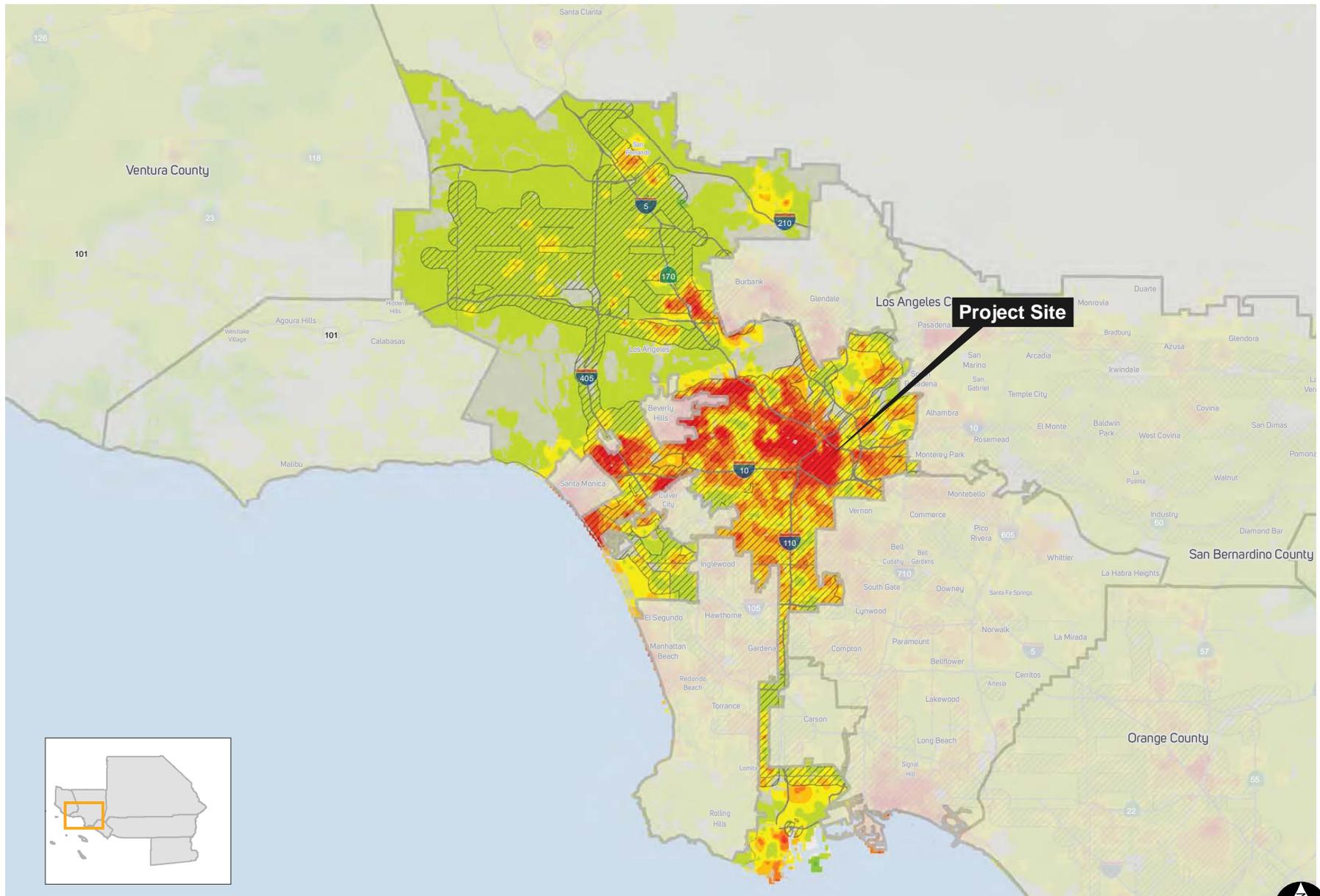
As the Project proposes to develop the Project Sites, located within the Central City Community Plan area, with multi-family dwelling units, the Project would be consistent with the Urban LDC. The Project is also located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743, each of which support transit opportunities and promote a walkable environment.¹ Regional vehicular access to the Project Sites is provided by the U.S. 101 (Hollywood) Freeway. Additional freeways providing indirect access to the Project Sites include the I-10 (Santa Monica) Freeway and State Route 110/I-110 (Pasadena/Harbor) Freeway. Local access to the Project Sites is provided via South San Pedro Street and 6th Street, and Crocker Street. The Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Ridership information for public transit near the Project Sites is shown on Table 3-1.

¹ SCAG, *High Quality Transit Areas 2012 – SCAG Region*, http://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0, accessed on June 14, 2018.



Source: SCAG, 2015.

Figure 3-1
 Forecasted Regional Development Types
 by Land Development Categories (2012) - Los Angeles City Subregion



Source: SCAG, 2015.

Figure 3-2
 Forecasted Regional Development Types
 by Land Development Categories (2040) - Los Angeles City Subregion

Table 3-1
Average Daily Public Transit Ridership Near the Project Sites

Local Lines	Weekday	Saturday	Sunday
16/17/316	21,072	14,684	12,293
18	17,976	13,941	10,085
51/52/352	23,301	18,529	13,738
53	12,698	8,572	5,674
60	14,830	11,455	9,575
62	4,266	2,727	1,991
720	26,864	16,701	13,531
760	4,286	1,819	- ¹
Gardena Line 1X	- ²	- ²	- ²
Montebello 40	- ²	- ²	- ²
Montebello 90	- ²	- ²	- ²
¹ No service on Sundays.			
² Information not available.			
Source: Metro, http://isotp.metro.net/MetroRidership/Index.aspx , April 19, 2018.			

The 2016-2040 RTP/SCS states that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Project, as described below, is a high-density mixed-use residential, commercial, and philanthropic institution project consisting primarily of restricted affordable dwelling units and proposes a significantly reduced number of parking spaces to encourage the use of alternative modes of transportation. Accordingly, the Project is fully consistent with the 2016-2040 RTP/SCS's characterization of HQTAs.

The 2016-2040 RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, R&D, industrial, civic, and open space.² More specifically, the Urban Mixed-Use and Urban Residential footprints are characterized as the following:

² SCAG 2016-2040 RTP/SCS Background Documentation, Urban Footprint Place Types, http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf. Refer to Appendix C; see also Place Types Categorized into Land Development Categories, available at: http://scagrtpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf.

Urban Mixed-Use

Urban Mixed Use	
	Land Use Mix <i>Residential 18%</i> <i>Employment 16%</i> <i>Mixed Use 45%</i> <i>Open Space/Civic 21%</i>
	Residential Mix <i>SF Large Lot 0%</i> <i>SF Small Lot 0%</i> <i>Townhome 0%</i> <i>Multi-Family 100%</i>
	Built Environment <i>Intersections per mile 200</i> <i>Average Floors 23</i> <i>Floors Range 15 – 100</i> <i>Total Net FAR 9.0</i>
	Employment Mix <i>Office 80%</i> <i>Retail 20%</i> <i>Industrial 0%</i>
Gross Density Range (per acre) Average Density (per acre)	
<i>Household 40-500+</i> <i>Household 85</i> <i>Employee 50-500+</i> <i>Employee 266</i>	

Urban Mixed-Use districts are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Parking is typically structured, below or above ground. Workers, residents, and visitors are well served by transit and can walk or bike for many of their transportation needs.

Source: SCAG, SCS Background Documentation Appendix, April 2016.

The land use mix for the Urban Mixed-Use place type is typically approximately 18 percent residential, 16 percent employment, 45 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net floor area ratio is 9.0; floors range from 15 – 100 stories, and the gross density ranges from 50 – 500 employees per acre and 40 – 500+ households per acre.³

³ *Ibid.*

Urban Residential

Urban Residential		
	Land Use Mix Residential 64% Employment 4% Mixed Use 12% Open Space/Civic 21%	Residential Mix SF Large Lot 0% SF Small Lot 0% Townhome 0% Multi-Family 100%
	Built Environment Intersections per mile 200 Average Floors 18 Floors Range 5 – 60 Total Net FAR 9.0	Employment Mix Office 22% Retail 78% Industrial 0%
	Gross Density Range (per acre) Household 75-500+ Employee 0-50+	Average Density (per acre) Household 131 Employee 44

Urban Residential place types “are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking [is] usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.

Source: SCAG, SCS Background Documentation Appendix, April 2016.

The land use mix for the Urban Residential place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net FAR is 9.0; floors range from 15 – 100 stories; and the gross density ranges from 0 – 50 employees per acre and 75 – 500+ households per acre.⁴

The Project is a mixed-use development consisting of residential, commercial, and philanthropic institution land uses in a highly urbanized part of Downtown Los Angeles to serve an existing homeless population on sites that are already developed (Site 1 is developed with a food service building and surface parking, and Site 2 is developed with surface parking). Land uses within the area of the Project Sites include a mix of homeless services, office, commercial, restaurant, retail, industrial, and residential uses, primarily in low-rise buildings. Mid-rise buildings are interspersed throughout the area of the Project Sites, and the Weingart Center Association building located to the south of Site 1 is 10 stories.

The Project is approximately 88 percent residential, and the housing consists entirely of multi-family residential dwelling units. The area of the Project Sites is supported by high levels of regional and local

⁴ Ibid.

transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.

The density of the Site 1 Project would be 602 residential dwelling units per acre, while the density of the Site 2 Project would be 270 residential dwelling units per acre. The combined density of the Site 1 and Site 2 Projects would be 391 residential dwelling units per acre.

More specifically, the Project consists of development of two sites: Site 1 and Site 2. The Site 1 Project consists of the demolition and removal of an existing food service building and surface parking lot and the construction of a two-building development, one 18-story building called Tower 1A and one 12-story building called Tower 1B, containing a maximum of 382 residential dwelling units, approximately 25,493 square feet of philanthropic uses that provide supportive services and approximately 2,250 square feet of commercial retail space.⁵ Of the 382 residential dwelling units, 378 residential dwelling units would be designated restricted affordable at the Very Low-Income level. Approximately 80 percent of the restricted affordable units would be set aside for permanent supportive housing of the homeless, and up to 20 percent of the restricted affordable units would be set aside for individuals and families. The remaining 4 residential dwelling units would be designated as manager's units. The total floor area of Site 1 would be 222,574 square feet, or an 8.1:1 FAR.

The Site 2 Project includes demolition and removal of the existing surface parking lot and development of the site with 164,875 square feet, 3.4:1 FAR, of mixed-use residential and commercial land uses in two buildings (Building 1 and Building 2). The Site 2 Project would include a total of 303 residential dwelling units (298 Very Low Income affordable units and 5 manager units), 3,200 square feet of commercial retail land uses, and 17,100 square feet of office uses. Of the 298 units set aside for very low-income households, not less than 60 percent of the units would be set aside for permanent supportive housing of the homeless, and up to 40 percent of the restricted affordable units would be set aside for individuals and families.

Accordingly, the Project is consistent with the general use designation, density, building intensity, and applicable policies specified for the area of the Project Sites in the SCAG 2016-2040 RTP/SCS.

The Project is consistent with the Applicable 2016-2040 RTP/SCS Policies Specified for the Project Area

The Project is consistent with SCAG's growth projections for the City, which supports the conclusion that the Project is consistent with SCAG policies. (Refer to Section 5, Environmental Impact Analysis, Checklist Topic 10, Population and Housing, for a discussion on the Project's consistency with SCAG's population and housing growth projections.) Additionally, as discussed below in Table 3-2, the Project would be consistent with applicable goals and policies of SCAG's 2016-2040 RTP/SCS.

⁵ *The food service building is operated by Weingart Center Association for the use by Weingart clients living in the Weingart Center.*

**Table 3-2
Consistency with SCAG’s 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Goal 1 Align the plan investments and policies with improving regional economic development and competitiveness.</p>	<p>Not Applicable. This Goal is directed towards SCAG and the City of Los Angeles (City) and not does apply to the Project.</p>
<p>2016-2040 RTP/SCS Goal 2 Maximize mobility and accessibility for all people and goods in the region.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units plus approximately 25,493 square feet of philanthropic institutional land uses and approximately 22,500 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, the Project Sites are located 0.7 mile southeast of Metro’s Purple/Red line station at Pershing Square and 0.8 mile southwest of Metro’s Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro’s Regional Connector 1st Street portal, which is currently under construction.</p> <p>In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create over 22,000 square feet of new commercial retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.</p>
<p>2016-2040 RTP/SCS Goal 3 Ensure travel safety and reliability for all people and goods in the region.</p>	<p>Not Applicable/Consistent. Though not necessarily applicable on a project-specific basis, the Project would ensure safe travel at and near the Project Sites by improving the public sidewalks adjacent to Project Sites. In addition, the Project would provide 493 secure bicycle spaces. Also, the Project would include street lighting and lighting of all pedestrian pathways adjacent to the Project Sites to allow for safe travel. Furthermore, the Project would be subject to the site plan review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways.</p>

**Table 3-2
Consistency with SCAG’s 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Goal 4 Preserve and ensure a sustainable regional transportation system.</p>	<p>Not Applicable. This goal is directed towards SCAG transportation projects and does not apply to the Project. The 2016-2040 RTP states, “A transportation system is sustainable if it maintains its overall performance over time in an equitable manner with minimum damage to the environment, and at the same time does not compromise the ability of future generations to address their transportation needs. Sustainability, therefore, pertains to how our decisions today impact future generations. One of the measures used to evaluate system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system performance at current conditions. The 2016-2040 RTP/SCS includes two additional new measures to support this outcome: State Highway System pavement condition and local roads pavement condition.”⁶</p> <p>Nevertheless, the Project would contribute to achieving this goal. As discussed in the Project’s Traffic Impact Study (located in Appendix M), the Project would not create a significant impact at any of the study intersections. Additionally, as discussed in the Traffic Impact Study, the Project did not meet or exceed any of the four thresholds defined in the Freeway Impact Analysis Agreement executed between Caltrans and Los Angeles Department of Transportation (LADOT) in December 2015. As indicated in the LADOT’s Transportation Impact Assessment for the Project dated May 3, 2018, the Project would not create a significant impact at any CMP monitoring location.</p> <p>The Project would minimize impacts on the existing roadway system by placing housing near jobs and transit and providing ample bicycle parking and bicycle and pedestrian infrastructure to disincentivize automobile use and encourage biking and walking. The Project also encourages transit use through the Project Sites’ location near existing transit, thereby contributing to ridership and sustainability of the multimodal transportation system in the region.</p>

⁶ SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).

**Table 3-2
Consistency with SCAG’s 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Goal 5 Maximize the productivity of our transportation system.</p>	<p>Consistent. The Project includes 685 residential dwelling units plus approximately 25,493 square feet of philanthropic institutional land uses and approximately 22,500 square feet of commercial land uses for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. Given the Project Sites’ location close to transit, the Project would encourage the utilization of transit as a mode of transportation to and from the Project area. Thus, the Project would contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. Moreover, as discussed in the Project’s Traffic Impact Study (located in Appendix M), the Project would not create a significant impact at any of the study intersections. Additionally, as discussed in the Traffic Impact Study, the Project would not create a significant impact at any CMP monitoring location.</p>
<p>2016-2040 RTP/SCS Goal 6 Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p>	<p>Consistent. The Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project has very little parking for the residential uses and instead focuses on providing ample bicycle parking and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low flow fixtures and efficient energy systems. The Project would also incorporate approximately 10,500 square feet of solar voltaic panels on the roof levels. Additionally, the Project would incorporate approximately 34,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant approximately 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking, and transit use.</p>
<p>2016-2040 RTP/SCS Goal 7 Actively encourage</p>	<p>Consistent. The Project would meet/exceed the</p>

Table 3-2
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
and create incentives for energy efficiency, where possible.	requirements of the City's Green Building Code and the California Green Building Code by including at least 20 percent of the Project's vehicle parking spaces to be capable of accommodating electric vehicle (EV) charging stations, and of that number, 5 percent would be wired as EV charging stations. Additionally, the Project would incorporate approximately 10,500 square feet of solar voltaic panels on the roof levels. Additionally, the Projects would include other features such as high-efficiency toilets with a flush volume of 1.0 gallon per flush, or less; showerheads with a flow rate of 1.5 gallons per minute, or less, and residential bathroom faucets equipped with aerators to reduce flow to 1.0 gallons per minute, or less.
2016-2040 RTP/SCS Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent. The Project Sites are located in a highly urbanized area in the City within a HQTA and a TPA. The Project would develop 685 residential dwelling units plus approximately 25,493 square feet of philanthropic institutional land uses and approximately 22,500 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, the Project Sites are located 0.7 mile southeast of Metro's Purple/Red line station at Pershing Square and 0.8 mile southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1 st Street portal, which is currently under construction. Moreover, the location of the Project Sites promotes the use of a variety of transportation options and access, which includes walking and the use of public transportation.
2016-2040 RTP/SCS Goal 9 Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Not Applicable. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.
2016-2040 RTP/SCS Guiding Policy 1 Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	Not Applicable. This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects and no further analysis is required.

Table 3-2
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
<p>2016-2040 RTP/SCS Guiding Policy 2 Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.</p>	<p>Not Applicable. This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Project would contribute to a safe, well maintained, and efficient multimodal transportation system. The Project would provide landscaping along the public rights-of-way and active ground-floor uses, which promotes and supports pedestrian activity in the area. As discussed in the Project's Traffic Impact Study (located in Appendix M), the Project would not create a significant impact at any of the study intersections. Additionally, the Project would not create a significant impact at any CMP monitoring location.</p>
<p>2016-2040 RTP/SCS Guiding Policy 3 RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.</p>	<p>Not Applicable. This Goal is directed towards SCAG and the City and not does apply to the Project. Nevertheless, the Project Sites are located in a highly urbanized area in the City, and the Project would support this policy through its development of 685 residential dwelling units plus approximately 25,493 square feet of philanthropic institutional land uses and approximately 22,500 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles.</p> <p>Moreover, the location of the Project Sites promotes the use of a variety of transportation options, which includes walking and the use of public transportation.</p>
<p>2016-2040 RTP/SCS Guiding Policy 4 Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.</p>	<p>Not Applicable. This policy is directed towards transportation investment by SCAG. However, the Project would support active transportation (e.g. walking and bicycling) by providing landscaping along the public rights-of-way and active ground floor uses, which promotes and supports pedestrian activity in the area. Additionally, the Project Sites' location within an HQTAs promotes the use of public transit and pedestrian activity.</p>
<p>2016-2040 RTP/SCS Guiding Policy 5 HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.</p>	<p>Not Applicable. This policy is directed towards transportation investment by SCAG to support high occupancy vehicles (HOV), transit and rideshare. Although this policy is not applicable to the Project, the Project Sites' location in an HQTAs promotes the use of public transit and pedestrian activity.</p>
<p>2016-2040 RTP/SCS Guiding Policy 6 The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging</p>	<p>Not Applicable. This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Project Sites are located</p>

Table 3-2
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
advanced technologies.	within an HQTAs (as defined SCAG) and a transit priority area (as defined by SB 743). The Project would support public transportation and other alternative methods of transportation (e.g., walking and biking).
2016-2040 RTP/SCS Guiding Policy 7 The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	Not Applicable. This policy is directed towards SCAG transportation projects to encourage and support transportation investments.
2016-2040 RTP/SCS Guiding Policy 8 Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	Not Applicable. This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments, and not does apply to the Project.
2016-2040 RTP/SCS Land Use Policy 1 Identify regional strategic areas for infill and investment.	Not Applicable. This policy is directed towards SCAG to identify regional strategic areas. Nevertheless, the Project is an infill development in an HQTAs (defined by SCAG) and within a transit priority area (as defined by SB 743).
2016-2040 RTP/SCS Land Use Policy 2 Structure the plan on a three-tiered system of centers development. ⁷	Not Applicable. This Land Use Policy is directed towards SCAG and not does apply to the Project. Nevertheless, the Project is located in an “existing” center where existing transportation infrastructure exists to support the proposed density of the Project.
2016-2040 RTP/SCS Land Use Policy 3 Develop “Complete Communities.”	Consistent. SCAG describes the development of “complete communities” to provide areas that encourage households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile. ⁸

⁷ The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is “Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment.” A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

⁸ SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

**Table 3-2
Consistency with SCAG’s 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	<p>As stated above, the Project would place residential and commercial land uses in a transit-rich area. The Project Sites’ location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Thus, the Project would be consistent with this land use policy to reduce vehicles-per-miles traveled.</p>
<p>2016-2040 RTP/SCS Land Use Policy 4 Develop nodes on a corridor.</p>	<p>Not Applicable. The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents’ daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. The Project is located within an HQTAs and a transit priority area. The Project’s mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities.</p>
<p>2016-2040 RTP/SCS Land Use Policy 5 Plan for additional housing and jobs near transit.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units plus approximately 25,493 square feet of philanthropic institutional land uses and approximately 22,500 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, the Project Sites are located 0.7 mile southeast of Metro’s Purple/Red line station at Pershing Square and 0.8 mile southwest of Metro’s Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro’s Regional Connector 1st Street portal, which is currently under construction.</p> <p>In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create approximately 22,500 square feet of new</p>

Table 3-2
Consistency with SCAG's 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
	commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.
2016-2040 RTP/SCS Land Use Policy 6 Plan for changing demand in types of housing.	<p>Consistent. Of the 382 residential dwelling units that would be developed on Site 1, 378 residential dwelling units would be restricted to be affordable at the Very Low-Income level. Approximately 80 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 20 percent would be set aside for individuals and families.</p> <p>Of the 303 residential dwelling units that would be developed on Site 2, 298 residential dwelling units also would be restricted to be affordable at the Very Low-Income level. Approximately 60 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 40 percent would be set aside for individuals and families.</p>
2016-2040 RTP/SCS Land Use Policy 7 Continue to protect stable, existing single-family areas.	Consistent. The Project Sites are not located on or near, and would not displace, any existing single-family residential neighborhoods. The Project provides housing in the City on an infill lot to serve an existing homeless population.
2016-2040 RTP/SCS Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.	Consistent. The Project Sites are located within an urbanized area within the City. Development of the Project would not remove any existing open space areas or habitat, since the Project Sites are fully developed. The Project would provide approximately 59,060 square feet of open space.
2016-2040 RTP/SCS Land Use Policy 9 Incorporate local input and feedback on future growth.	Not Applicable/Consistent. This Land Use Policy is directed towards SCAG and does not necessarily apply to the proposed Project. Regardless, the purpose of the Project is to respond to the City's need to serve and accommodate an existing homeless population.
2016-2040 RTP/SCS Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvements, and efficient transportation infrastructure.	Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 affordable residential dwelling units plus approximately 25,493 square feet of philanthropic institutional land uses and approximately 22,500 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines

Table 3-2
Consistency with SCAG’s 2016-2040 RTP/SCS

Goals and Policies	Consistency Assessment
	<p>(including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, the Project Sites are located 0.7 mile southeast of Metro’s Purple/Red line station at Pershing Square and 0.8 mile southwest of Metro’s Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro’s Regional Connector 1st Street portal, which is currently under construction. Additionally, the Project includes 493 secure bicycle parking spaces.</p> <p>Of the 382 residential dwelling units that would be developed on Site 1, 378 residential dwelling units would be restricted to be affordable at the Very Low-Income level. Approximately 80 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 20 percent would be set aside for individuals and families.</p> <p>Of the 303 residential dwelling units that would be developed on Site 2, 298 residential dwelling units also would be restricted to be affordable at the Very Low-Income level. Approximately 60 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 40 percent would be set aside for individuals and families.</p>
<p>2016 RTP/SCS Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.</p>	<p>Not Applicable. Benefit 2 is directed towards SCAG and not does apply to the Project. The Project is an infill, mixed-use project located within an HQTA, thereby decreasing time and cost of traveling between places.</p>
<p>2016 RTP/SCS Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.</p>	<p>Consistent. The Project would meet/exceed the requirements of the City’s Green Building Code and the California Green Building Code by including at least 20 percent of the Project’s vehicle parking spaces to be capable of accommodating EV charging stations, and of that number, 5 percent would be wired as EV charging stations. The Project also would incorporate approximately 10,500 square feet solar voltaic panels on the roof levels. Additionally, the Project includes 493 secure bicycle parking spaces. The Project’s incorporation of bicycle-and pedestrian-friendly elements and location near</p>

**Table 3-2
Consistency with SCAG’s 2016-2040 RTP/SCS**

Goals and Policies	Consistency Assessment
	various bus lines would provide future residents with various affordable transportation options. The Project is a high-density mixed-use development on an infill site, well served by existing utilities.
<p>2016 RTP/SCS Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.</p>	<p>Consistent. The Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project has very little parking for the residential uses and instead focuses on providing ample bicycle parking and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low flow fixtures and efficient energy systems. The Project would also incorporate approximately 10,500 square feet of solar voltaic panels on the roof levels. Additionally, the Project would incorporate approximately 34,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant approximately 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking, and transit use. Also, the Project would include drought-tolerant landscaping.</p>
<p><i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.</i></p>	

Consistency with TPP Criterion #2(a) – The Project contains at least 50 percent residential use.

The Project includes the construction of a total floor area of 387,449 square feet. The Project includes 685 residential dwelling units, encompassing approximately 339,406 square feet of residential floor area, and comprising approximately 88 percent of the total floor area. Site 1 includes 222,574 square feet of floor area, of which 220,324 square feet (or 99 percent) would be dedicated to residential uses, while 2,250

square feet would be dedicated to commercial uses.⁹ Site 2 includes 164,875 square feet of floor area, of which 144,575 square feet (or 88 percent) would be dedicated to residential units, while 20,300 square feet would be dedicated to commercial uses.¹⁰ As such, the Project would be consistent with this Criterion.

Consistency with TPP Criterion #2(b) – The Project includes a minimum net density of at least 20 units per acre.

The Project Sites total approximately 1.75 acres. The Project includes 685 residential dwelling units and as such, the Project provides approximately 391 dwelling units per acre. Site 1 is 0.63 acres in size and would be developed with 382 residential dwelling units, equating to 601 residential dwelling units per acre. Site 2 is 1.12 acres in size and would be developed with 303 residential dwelling units, equating to 261 residential dwelling units per acre. As such, the Project would be consistent with this Criterion.

Consistency with TPP Criterion #2(c) – The Project Site is located within one-half mile of a major transit stop or a high quality transit corridor included in the 2016-2040 RTP/SCS.

Public Resources Code (PRC) Section 21155 (b) defines a “high-quality transit corridor” as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project Sites are located in an urban area served by multiple local bus lines that are adjacent to the sites and with service intervals of 15 minute or less during morning and afternoon peak commute periods, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90 (refer to Table 3-1). Moreover, the Project Sites are located within a half-mile of a high-quality transit corridor (i.e., East 6th Street and South San Pedro Street) (refer to Figure 3-3). As such, the Project is consistent with this Criterion.

⁹ This number includes approximately 25,000 square feet of philanthropic uses. Refer to Section 2 (Project Description) for more detail regarding this use.

¹⁰ Ibid.

