

# FOURTH & CENTRAL PROJECT

Application for Environmental Leadership Development Project

Prepared for  
CP LA Cold Storage Land, LLC

September 2023





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# APPLICATION FOR ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT

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**Project Title: Fourth & Central Project**

**Project Applicant: CP LA Cold Storage Land, LLC**

**Project Location: 364, 400–464 (even), 425, 427, 429, 431, and 433 South Central Avenue; 707, 715, 730 East 4th Street; Los Angeles, CA 90013**

## Project Proposal

### Introduction

CP LA Cold Storage Land, LLC (Applicant) has submitted an application for the Fourth & Central Project (Project) to the City of Los Angeles Department of City Planning for discretionary review. The Project would generally be located at 400 S. Central Avenue in the City of Los Angeles and consists of three distinct sites (North, South, and West Sites), with a total land area of approximately 7.6 acres [333,602 gross square feet (sf) of lot area pre-dedication]. The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites, respectively, and potentially adaptively reuse a portion of a six-story cold storage building on the North Site, while demolishing the remaining warehouse uses. The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings.

California Senate Bill (SB) 7 (Jobs and Economic Improvement Through Environmental Leadership Act of 2021), signed into law by the Governor on May 20, 2021 as an urgency statute, authorizes the Governor, upon submittal of an application from a project applicant, to certify a project as defined in Public Resources Code (PRC) Section 21187.5, if the project meets the requirements of an Environmental Leadership Development Project (ELDP). SB 7 requires a project applicant to provide evidence and materials that the Governor deems necessary to make a decision on the project ELDP certification, which evidence and materials are contained in this application. Under SB 7, an ELDP must be certified by the Governor before January 1, 2024 and a certified project must be approved by the lead agency before January 1, 2025. SB 149 (California Environmental Quality Act: administrative and judicial procedures: record of proceedings: judicial streamlining) signed into law by the Governor on July 10, 2023, extends these dates to January 1, 2032 and January 1, 2033, respectively.

## Project Description

as noted above, the Project would generally be located at 400 South Central Avenue and consists of three distinct sites (North, South and West Sites – collectively referred to as the Project Site), with a total land area of approximately 7.6 acres (333,602 gross sf of lot area pre-dedication). The Project Site is comprised of the following areas: North Site (1.35 acres) located at the northeast corner of 4<sup>th</sup> Street and Central Avenue; South Site (5.98 acres) located south of 4<sup>th</sup> Street between Central Avenue and Alameda Street; and West Site (0.32 acres) located at the northwestern intersection of Gladys Avenue and Central Avenue.

The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites. The Project intends to adaptively reuse (in accordance with Code-approved structural engineering practice) a portion of a six-story cold storage warehouse building located on the North Site, while demolishing the remaining attached single-story warehouse building on the North Site. However, because the currently operating North Site cold storage warehouse building has been “frozen” for over 100 years, a confirmation of its structural integrity cannot be made until the existing operations cease (when and if the Project is approved) and the North Site building is “unfrozen.” Accordingly, for purposes of this analysis and to provide a worst-case, conservative assessment of potential environmental impacts, such as construction greenhouse gas (GHG) emissions, the Project is assumed to demolish the entire six-story cold storage warehouse building and attached single-story warehouse on the North Site. Whether a portion of the six-story cold storage warehouse building on the North Site is adaptively reused or not, the development programming on the North Site (and Project) would remain similar under either development scenario.

The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the Project Site totaling 2,318,534 sf, for a floor area ratio (FAR) of 6.95:1. The Project would include: 1,521 residential units, including affordable housing units, totaling 1,731,849 sf; 411,113 sf of office uses; 101,088 sf of restaurant/retail uses;<sup>1</sup> and 68 hotel rooms (74,484 sf of hotel floor area). The Project would include 163,325 sf of Los Angeles Municipal Code (LAMC) required private open space. In addition, the Project would include 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The proposed buildings would range in height from 2 to 44 stories, with a maximum height of 497 feet. The Project would provide 2,475 vehicle parking spaces within subterranean parking (up to 4 levels) and 6 levels of podium parking in Building 2 and 4 levels of podium parking in Building 9. The Project would also provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

Each of the Project uses are shown by building within the three areas of the Project Site (e.g., North Site, South Site, and West Site) in **Table 1, Project Use and Floor Area Summary**.

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<sup>1</sup> The 101,088 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per Los Angeles Municipal Code (LAMC) requirements. An additional potential 13,024 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the GHG emissions analyses evaluates a total of 114,112 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,846 square feet of restaurant uses.

**TABLE 1  
PROJECT USE AND FLOOR AREA SUMMARY**

	<b>Square Feet Residential Floor Area</b>	<b>Square Feet Restaurant/ Retail Floor Area</b>	<b>Square Feet Office Floor Area</b>	<b>Square Feet Hotel Floor Area</b>
<b>North Site</b>				
Building 1	44,660	16,378	—	—
Building 2	649,911 (449 units)	12,694	—	—
<i>Subtotal North Site</i>	<i>694,571</i>	<i>29,072</i>	<i>—</i>	<i>—</i>
<b>South Site</b>				
Building 3	—	15,291	81,854	—
Building 4	—	7,721	184,162	—
Building 5	407,217 (425 units)	11,359	—	—
Building 6	88,228 (68 units)	15,567	—	74,484 (68 rooms)
Building 7	126,555 (123 units)	12,357	—	—
Building 8	—	4,645	145,097	—
Building 9	293,574 (312 units)	5,076	—	—
<i>Subtotal South Site</i>	<i>915,574</i>	<i>72,016</i>	<i>411,113</i>	<i>74,484</i>
<b>West Site</b>				
Building 10	121,704 (144 units)	—	—	—
<b>Total Floor Areas by Use/Units/Rooms</b>	<b>1,731,849 (1,521 units)</b>	<b>101,088 <sup>a</sup></b>	<b>411,113</b>	<b>74,484 (68 rooms)</b>
<b>Total Floor Area Ratio (FAR): 6.95</b>				
<b>Land Area (pre-dedication): 333,602 sf</b>		<b>Total Floor Area: 2,318,534 sf</b>		
<b>Total Parking Spaces Provided: 2,475</b>		<b>Short-Term Bicycle Spaces Provided: 146</b>	<b>Long-Term Bicycle Spaces Provided: 596</b>	

<sup>a</sup> The 101,088 square feet restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 13,024 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the GHG emissions analyses evaluates a total of 114,112 square feet of restaurant/retail uses. It is assumed there would be 45,266 square feet of retail uses and 68,846 square feet of restaurant uses.

SOURCE: Studio One Eleven, February 2022.

The City of Los Angeles (City) is the Lead Agency under the California Environmental Quality Act (CEQA). The list below includes the anticipated requests for approval of the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- **General Plan Amendment** pursuant to LAMC Section 11.5.6 A to re-designate the underlying land use from Light Industrial to Regional Commercial.
- **Vesting Zone Change and Height District Change** pursuant to LAMC Sections 12.32 F, 12.32 H, and 12.32 Q, to change the zone from M2-2D/M2-2D-O to C2-2, which involves removing the D Development Limitation.

- **Affordable Housing Development Incentives under Measure JJJ** to allow the following incentives:
  - FAR increase to 6.95:1; and
  - Averaging of FAR, parking, and open space across the Project Site.
- **Main Conditional Use Permit** pursuant to LAMC Section 12.24 W.1 to permit the sale and dispensing of alcoholic beverages for on-site and/or off-site consumption.
- **Site Plan Review** pursuant to LAMC Section 16.05 for approval of development of a project which creates 50,000 gross sf or more of nonresidential floor area and creates 50 or more dwelling units.
- **Vesting Tentative Tract Map** pursuant to LAMC Section 17.15 to merge 35 existing lots and re-subdivide into four (4) ground lots and twenty-six air space lots for commercial and residential purposes.
- **Development Agreement** approval pursuant to Government Code Sections 65864 et seq.

In addition to the entitlements identified above, additional approvals will be required for construction and operation of the Project, including, but not limited to approval of permits for the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements, improvements within the public right-of-way and the removal of trees on public property.

## Project Site

The Project Site is generally located at 400 Central Avenue and is made up of six (6) parcels, with a total land area of approximately 7.6 acres (333,602 gross sf of lot area). The parcels that make up the Project Site are clustered across three City blocks and include the following three areas:

- The 1.35-acre North Site (APN 5147-001-007) is generally located at the northeast corner of Central Avenue and 4<sup>th</sup> Street.
- The 5.98-acre South Site (APN 5147-013-016) is generally bound by 4<sup>th</sup> Street to the north, Alameda Street to the east, Central Avenue to the west and industrial uses to the south. The southern boundary of the South Site generally terminates near the intersection of 5<sup>th</sup> Street and Central Avenue.
- The 0.32-acre West Site (APNs 5147-012-015, 5147-011-015, -016, -017) is generally located west of the intersection of Gladys Avenue and Central Avenue.

The Project Site is located in an area served by a variety of mobility options and is within walking distance of major transit options. The Project Site is also located within a Transit Priority Area, which is defined by the PRC as an area within 0.5 miles of an existing or planned major transit stop. (Pub. Res. Code, Section 21099(a).) Bus and light rail service is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT). The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.

The Project Site is also located within walking distance (less than 0.4 miles) of the Metro Regional Connector Little Tokyo/Arts District station, which reopened in 2023. The Regional Connector Project will make it easier to ride across Los Angeles County as passengers will be able to travel between Azusa and Long Beach, and between East Los Angeles and Santa Monica, without transferring lines. It will improve connections, bringing together the Metro L (Gold), A (Blue), E (Expo), B (Red) and D (Purple) Lines at the 7th Street/Metro Center Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District. Three new transit stations will be developed as part of the Metro Regional Connector Project. The closest new transit station will be located at 1st Street and Central Avenue, less than 0.4 miles north of the Project Site.

## Existing Site Uses

The North Site is currently developed with a six-story cold storage warehouse building and attached single-story warehouse. The six-story warehouse also includes a one-level basement, which is not counted as part of the six, above ground stories. The combined floor area of the two buildings is approximately 167,596 sf. Approximately 20 loading docks for the North Site are located along 4th Street and Central Avenue. The SurveyLA Historic Resources Survey Report for the Central City Community Plan area identifies the existing six-story warehouse building built in the early 1900's on the North Site (715 4th Street) as an individual resource. The building was originally constructed as a cold storage warehouse for the Los Angeles Ice and Cold Storage Company. The original portion of the building has remained in continuous use since it was built in the early 1900s, and is intended to be renovated and adaptively reused as part of the Project.

The South Site is developed with a two-story cold storage building totaling approximately 190,267 sf and a conjoining 2,871 sf, single-story office building, constructed between 1957 and 1959, respectively. The two buildings have a total floor area of approximately 193,138 sf. The South Site also includes 47 loading docks and paved surface parking with approximately 33 spaces that serve the warehouse building.

The West Site is developed with 39 parking spaces in a fenced, paved lot and is not improved with any buildings. The paved lot allows for additional parking for the existing cold storage facilities across Central Avenue on the North and South Sites.

Above ground utility lines are present at the intersection of Central Avenue and 4th Street, and along the south side of 4th Street and the west sides of Central Avenue and Alameda Street adjacent to the Project Site. There is no landscaping on the Project Site. On-Site vegetation is limited to 20 fern pines (*Podocarpus* sp.) within the adjacent roadway right-of-way, with ten trees being located on the northern boundary of the North Site (along 4th Street) and ten trees along the eastern boundary of the South Site along Alameda Street. These are not a protected species; however, each of these street trees would be replaced at a ratio of 2:1 by the Project.

## Consistency with Statutory Requirements for CEQA Streamlining

This application was prepared in accordance with SB 7 (Environmental quality: Jobs and Economic Improvement Through Environmental Leadership Act of 2021), which reenacts the Jobs and Economic Improvement Through Environmental Leadership Act of 2011 (former leadership act), which was repealed by its own terms on January 1, 2021, with certain changes. SB 7 adds and repeals Chapter 6.5 (commencing with Section 21178) of Division 13 of the PRC, relating to environmental quality. SB 149 extends the dates for ELDP certification by the Governor to before January 1, 2032 and lead agency approval of a certified project to before January 1, 2033.

The following information (in addition to all exhibits) is submitted to establish that the Project satisfies the statutory requirements for CEQA streamlining as further informed by the criteria set forth in the Governor's Guidelines under PRC Section 21178 et seq.

### **1. Information to show the project is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature.**

The Project proposes the development of a cohesive mix of residential, hotel, retail/commercial, office, and community uses on a previously developed "infill" site. The Project Site is located within a State Enterprise Zone (City of Los Angeles Department of City Planning Zoning Information [ZI] No. 2374) and the Greater Downtown Housing Incentive Area (City of Los Angeles Department of City Planning ZI No. 2385). The entire Project Site is located within approximately 0.5 miles of the planned and under construction Metro L Line Little Tokyo/Arts District Station at East 1st Street and Central Avenue to the north of the Project Site.

The Project would include: 1,521 residential units, including affordable housing units, totaling approximately 1,731,849 sf; approximately 411,113 sf of office uses; approximately 101,088 sf of restaurant/retail uses (114,112 sf inclusive of outdoor dining/patio space); and 68 hotel rooms totaling 74,484 sf of hotel floor area. The Project would include 163,325 sf of LAMC required private open space. In addition, the Project would include 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites.

Proposed site plans for the Project are attached as **Exhibit 1**. A rendering of the Project is attached as **Exhibit 2**.

- 2. Information to show the project, upon completion, will qualify for LEED Gold Certification or better. The application shall specify those design elements that make the project eligible for LEED Gold Certification or better, and the applicant shall submit a binding commitment to delay operating the project until it receives LEED Gold Certification or better. If, upon completion of construction, LEED Gold Certification or better is delayed as a result of the certification process rather than a project deficiency, the applicant may petition the Governor to approve project operation pending completion of the certification process.**

The Project would include design and construction decisions that have the potential to reduce energy and water use, promote resource conservation through redevelopment and the sourcing of local construction materials, and create healthier indoor environments. The Project would achieve the requirement to meet the United States Green Building Standards (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification. Achieving LEED Gold Certification requires obtaining at least 60 points satisfying seven categories, which can be organized into three overarching themes: Siting and Transportation, Building Performance, and Material Selection. The end result is a positive impact on resource conservation, the built environment, and the local community.

Because there are multiple buildings, the Project shall utilize the following documents:

- LEED v4 BD+C NC Leadership in Energy and Environmental version 4 Building Design and Construction – New Construction rating system.
- LEED v4 BD+C NC Combined Project Scorecard (Office, Retail, Hotel, and Multi-family).

A detailed analysis of the Project’s ability to achieve LEED Gold Certification is provided in Sustainability Basis of Design documents for Office and Retail, Hotel, and Multi-Family Highrise provided in **Exhibit 3**.

The North, South and West Sites of the Project will submit as a Master Site – a certification process that allows projects that are on a shared site to document campus credits that are applicable to the entire site and buildings. Examples of campus credits include Location and Transportation Credit 7 (LTc7 – Reduced Parking Footprint) and Sustainable Sites Credit 5 (SSc5 – Heat Island Reduction). This approach allows for efficiencies in the LEED management and documentation process. As a complement to the Master Site approach, the Project would then pursue individual LEED certifications for each building.

The Project Site’s urban location enables the Project to earn LEED Location and Transportation credits related to public transit, bike usage, and electric vehicle charging stations (EVCS). The Project Site would be readily accessible by several public transit options including numerous City bus lines and rail at Metro’s Regional Connector Little Tokyo/Arts District station, which reopened in June 2023. A transportation demand management (TDM) program would be implemented to reduce the Project’s single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours.

Additionally, the Project would comply with the City’s Electric Vehicle Parking Ordinance, which requires 30 percent of the Project’s total parking spaces to be designated as EV spaces capable of supporting future

electric vehicle supply equipment (EVSE) and 10 percent of the total number of spaces to be EVCS (Ordinance No. 186,485). Further, the Project is required to provide on-site short and long-term bicycle parking in various areas with consideration of its integration throughout the Project and surrounding roadway network.

The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.

The Project will investigate the use of local low-carbon materials and Environmental Product Declaration (EPDs) to promote the City's green material economy by using the "Buy Clean California Act" (Assembly Bill [AB] 262) as a reference and resource.

The Project will use tree landscaping via passive solar shading and use cool roof/pavement coatings to reduce the urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. The Project will focus on occupant wellness by incorporating healthy materials with low-volatile organic compounds (VOCs), abundant daylight, superior interior lighting quality, and accessible thermal comfort control to prevent sick building syndrome. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and dedicated on-site recycling areas. The Project will also incorporate indoor air quality best practices to provide clean ventilation for improved breathing.

A discussion of the Project's implementation of LEED measures for the three overarching themes (Siting and Transportation, Building Performance, and Material Selection) is provided below.

**Siting, Transportation, and Mixed Use:** This overarching theme addresses preservation of undeveloped property by encouraging infill development, adaptive re-use of existing historic buildings, and facilitating pedestrian activity by integrating a diversity of uses and providing convenient access to public transportation. The Project has been designed as high-density residential and office uses with neighborhood serving commercial uses proximate to entertainment and employment, and would integrate a range of residential, office uses, and commercial uses around public and private open spaces. The Project is located in a prime urban location in Los Angeles in proximity (i.e., within one-half mile) to transit including the Metro Regional Connector Little Tokyo/Arts District station, which reopened in June 2023 as part of the Regional Connector Project. The Regional Connector Project extends the Metro L Line from the Little Tokyo/Arts District Station to the 7th Street Metro Center Station in Downtown Los Angeles, allowing passengers to transfer to Metro's A Line, E Line, B Line and D Lines, bypassing Union Station. The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.

For the North Site Buildings 1 and 2, the Project intends to adaptively reuse a portion of the existing six-story cold storage building at 715 4th Street as part of Building 1 to provide new restaurant/retail uses and

residential amenities. The six-story brick building intended to be adaptively reused was originally constructed in the early 1900s and is identified by SurveyLA as an individual historical resource. The building, identified by SurveyLA as the Los Angeles Ice and Cold Storage Company building, played an important role in the distribution of agricultural goods and locally sourced food products in the early 20th century. The Project's distinctive reuse of the original footprint of this building is proposed to maintain a direct connection to the neighborhood's industrial past and help preserve its historic character. However, because the currently operating North Site cold storage building has been "frozen" for over 100 years, a confirmation of its structural integrity cannot be made until the existing operations cease (when and if the Project is approved) and the North Site building is "unfrozen." Accordingly, for purposes of this analysis and to provide a worst-case, conservative assessment of potential environmental impacts, the Project is assumed to demolish the entire six-story cold storage warehouse building and attached single-story warehouse on the North Site. Whether a portion of the six-story cold storage warehouse building on the North Site is adaptively reused or not, the development programming on the North Site (and Project) would remain similar under either development scenario.

Building 2, at up to 44 stories, would be the Project's densest and tallest structure and would consist of residential uses and ground-floor retail uses. Building 2 be strategically placed on the northernmost portion of the Project Site to be nearest to Metro's Little Tokyo/Arts District Station, a regional transit connector line located at Alameda and 1st Street, to the north of the Project Site, to strongly encourage the use of public transportation options by future residents, employees, guests, and other visitors.

The South Site Building 3 through 9 will be constructed as a mix of office, residential and commercial uses, with publicly accessible open space including several plazas and paseos that would be open between Central Avenue to Alameda Street. Building 3 would be connected to Building 4 via bridges at the fourth and sixth floors to simplify pedestrian travel. The West Site Building 10 would be a residential structure with 144 residential units.

Four streets, including 4th Street, Central Avenue, Alameda Street, and Gladys Avenue, are located adjacent to the Project Site. Central Avenue and Alameda Street are designated as Avenue I in the City of Los Angeles 2035 Mobility Plan (Mobility Plan). 4th Street is designated as Avenue II, and Gladys Avenue is designated as a Local Street under the Mobility Plan. The Mobility Plan requires a right-of-way of 100 feet and a roadway width of 70 feet for the Avenue I designation; a right-of-way of 86 feet and a roadway width of 56 feet for the Avenue II designation, and a right-of-way of 60 feet and a roadway of 36 feet for local streets. In order to meet the requirements of the Mobility Plan, the Project anticipates that additional street dedications, including 6 feet along the south side of 4th Street adjacent to the Project Site and 10 feet along the west side of Alameda Street would be required. No additional dedications would be required along Central Avenue or Gladys Avenue.

Vehicle access to the North Site would be provided via driveways along Central Avenue at the northwest corner of the North Site and 4th Street at the southeast corner of the North Site. An internal drive aisle would connect the two driveways and would also provide access to the parking podium and subterranean levels at Building 2 along the north side of the North Site. Loading docks and delivery truck access from the internal drive aisle would also be located at Building 2, at the east side of the North Site. Vehicle access to the South Site would be provided via one driveway along Alameda Street and two driveways along Central Avenue. The northerly Central Avenue driveway and Alameda Street driveway would be connected

by an internal east-west drive aisle. The internal drive aisle would provide access to the subterranean parking structure at Building 4. The southerly driveway along Central Avenue would provide access to the parking podium and subterranean levels at Building 9.

A designated passenger drop-off area would be located adjacent to Building 5 along Alameda Street. Passenger loading and unloading areas would also be adjacent to Building 3 along Central Avenue and adjacent to Building 6 on the interior drive aisle. Pedestrian circulation would include several pedestrian passages open to the sky that would provide a continued pedestrian connection throughout the Project Site. The South Site, which contains the bulk of the Project, includes an internal east-west drive aisle. A pedestrian thoroughway referred to as the “Mews” would be along both sides of the drive aisle, with pavement coordinated with internal driveway, wide sidewalks, bollards, pedestrian pole lights, zero curbs, and uniform street trees. In summary, the Project’s pedestrian amenities include the 4th Street Plazas; the two Flex Alleys; the 4th Street Green; the Central Courtyard; the block-to-block sidewalks that comprise the Mews (these have the same pavement as the roadway, but are not part of the roadway); and the 5th Street Pocket Park. The public sidewalks along Central Avenue, 4th Street, Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree lined sidewalks. Public sidewalks would be approximately 15 feet in width (varying from 10 to 16 feet) along the Project’s street frontages. Pedestrian crosswalks at the intersections of Alameda Street and 4th Street, 4th Street and Central Avenue, and at the corner of 5th Street and Central Avenue would be maintained and provide connections between the North, South and West Sites.

**Building Performance:** This overarching theme emphasizes water and energy efficiency to maximize livability with reduced resource consumption. The Project would incorporate high performance building envelopes to maximize energy efficiency and high-efficiency fixtures and appliances to optimize building energy performance. The Project buildings would be designed to utilize electricity and not natural gas. Accordingly, natural gas would not be supplied to support Project building operations related to building energy. While building electrification would result in higher electricity usage, since traditionally natural gas appliances and equipment would instead be electrified, the Project buildings would eliminate the use of a fossil fuel and the associated GHG emissions (i.e., direct natural gas combustion) from building energy demand. The Project would not result in installation of any new natural gas infrastructure. The Project would incorporate high efficiency water fixtures and comply with the California Department of Water Resources Model Water Efficient Landscape Ordinance to maximize water efficiency and reduce water use. The Project would include other specific design features that would be incorporated into the Project design to enhance energy and water efficiency, such as incorporating rainwater management strategies such as a green roof, rainwater capture, and pervious paving. The Project would also be graywater ready by incorporating graywater plumbing. Building energy conservation measures would increase the energy cost savings for the project and achieve at least five (5) LEED points. Measures may include LED lights, lighting occupancy controls, daylight sensors, high-efficiency mechanical equipment, appliances, and process equipment. A high-performance façade with shading can also reduce solar gains and cooling loads in the building. Incorporating on-site renewable energy systems also improves the project’s performance in this credit. LEED credits and points will be confirmed by calculations completed for prerequisite Minimum Energy Performance.

**Material Selection:** This overarching theme attempts to reduce the building’s life cycle impact through the selection of upcycled, recycled, and locally sourced materials where feasible and also minimize exposure to environmental toxins by choosing low volatile organic compound (VOC) materials. The Project would

incorporate materials and products with environmental product declarations (EPD) and health product declarations (HPD), which are materials and products with verified and registered disclosure documents that communicate transparent and comparable information about the life-cycle environmental impact of materials and products and disclosure of the potential chemicals of concern in materials and products. In addition, the Project would divert at least 75 percent of nonhazardous construction and demolition materials by utilizing City-approved construction and demolition haulers and implementation of a construction waste management plan.

**3. Information to show the project will achieve at least 15 percent greater transportation efficiency, as defined in Public Resources Code section 21180(c), than comparable projects. The applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the project will achieve at least 15 percent greater transportation efficiency. For residential projects, the applicant shall also submit information demonstrating that the number of vehicle trips by residents divided by the number of residents is 15 percent more efficient than for comparable projects. For the purpose of this provision, comparable means a project of the same size, capacity and location.**

Regional access to the Project Site is provided by Interstate 10 (I-10), which runs east-west approximately 1-mile south of the Project Site (at its closest point); United States Route 101 (US-101), which generally runs north-south and is located both north and east of the Project Site, with the closest segment of US-101 located approximately 0.7 miles north of the Project Site, Interstate 5 (I-5), which runs north-south approximately 1.1 miles east of the Project Site, and Interstate 110 (I-110), which runs north-south approximately 1.2 miles west of the Project Site (at its closest point). Local access to the Project Site is provided by 4th Street, Central Avenue, and Alameda Street.

The Project Site is located in an area served by a variety of mobility options and is within walking distance of major transit options. The Project Site is also located within a Transit Priority Area, which is defined by the PRC as an area within 0.5 miles of an existing or planned major transit stop. (Pub. Res. Code, § 21099(a).) Bus and light rail service is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT). The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.

The Project Site is also located within walking distance (less than 0.4 miles) of the Metro Regional Connector Little Tokyo/Arts District station, which reopened in June 2023. The Regional Connector Project extends the Metro Gold Line from the Little Tokyo/Arts District Station to the 7th Street Metro Center Station in Downtown Los Angeles, allowing passengers to transfer to Blue, Expo, Red and Purple Lines, bypassing Union Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District. Three new transit stations will be developed with operation of the Metro Regional Connector. The closest new transit station will be located at 1st Street and Central Avenue, less than 0.4 miles north of the Project Site.

A transportation demand management (TDM) program will be implemented to reduce the Project's single occupant vehicles trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM program will include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. The TDM program may include the following strategies:

- Reduced parking supply to make parking less available, and therefore, encourages the use of non-automobile modes to and from the Project Site.
- Unbundled parking.
- Parking cash-out program.
- Promotions and marketing of alternative transportation options, which may include a Transportation Information Center, educational programs, kiosks and/or other measures.
- Implementation of a bicycle share station.
- Bicycle amenities such as racks, secure bicycle parking, and showers.
- Contribution to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area.
- Pedestrian network improvements within the Project Site and that connect to off-site facilities.

The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.).

The ELDP Transportation Efficiency Analysis for the Fourth and Central Project, dated August 31, 2023, is attached as **Exhibit 4**. The City of Los Angeles vehicle miles traveled (VMT) calculator (City of Los Angeles VMT Calculator Version 1.3) (VMT Calculator) was used to evaluate the Project's transportation efficiency. As detailed in the analysis, the Project will achieve at least 15 percent greater transportation efficiency, as defined in PRC Section 21180(c), than comparable projects.

**4. Information to show the project is located on an infill site, defined at Public Resources Code Section 21061.3, and in an urbanized area, as defined at Public Resources Code Section 21071.**

PRC Section 21061.3 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses. The Project proposes the development of a cohesive mix of residential, hotel, retail/commercial, office, and community uses on a site previously developed with cold storage facility uses. As such, the Project meets the definition of an "infill" site. The Project site is located in the City of Los Angeles, which has a population of at least 100,000 persons, which meets the definition of an urbanized area as defined in PRC Section 21071. The entire Project Site is located within approximately 0.5 miles of the planned and under construction Metro L Line Little Tokyo/Arts District Station at East 1st Street and Central Avenue to the north of the Project Site. As such, the Project would meet the criteria of PRC Section 21061.3 and Section 21071.

**5. The information required by Public Resources Code section 21180(b)(1) is available for projects within a metropolitan planning organization for which a sustainable communities strategy or alternative planning strategy is in effect. For the purposes of this provision, “in effect” means that the sustainable communities strategy or the alternative planning strategy has been adopted by the metropolitan planning organization, and that the Air Resources Board has accepted the metropolitan planning organization’s determination that the sustainable communities strategy or alternative planning strategy meets the adopted greenhouse gas reduction targets and is not the subject of judicial challenge.**

SB 375 was passed by the State Assembly on August 25, 2008 and signed into law by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in California AB 32. Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt a Sustainable Community Strategy to encourage compact development that reduces passenger vehicle miles traveled (VMT) and trips so that the region will meet a target, created by the California Air Resources Board (CARB), for reducing GHG emissions.

The Project is within the jurisdiction of the Southern California Association of Governments (SCAG). On April 4, 2012, SCAG’s Regional Council adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future (2012-2035 RTP/SCS). On April 7, 2016, SCAG’s Regional Council adopted the 2016-2040 RTP/SCS: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life. The 2016-2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012-2035 RTP/SCS. On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), which builds on the previous 2016-2040 RTP/SCS. On October 30, 2020, CARB accepted SCAG’s quantification of GHG emission reductions from the 2020-2045 RTP/SCS and the determination that it would, if implemented, achieve the 2035 GHG emission reduction targets established by CARB.<sup>2</sup>

The purpose of the SCAG 2020-2045 RTP/SCS is to achieve its assigned regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG’s 2020-2045 RTP/SCS plans for regional population growth using smart land use strategies. The 2020-2045 RTP/SCS seeks improved mobility and accessibility, which is defined as “the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices.”<sup>3</sup> The 2020-2045 RTP/SCS seeks to implement strategies that “alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation.”<sup>4</sup> As part of the 2020-2045 RTP/SCS, “transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region’s growth would be encouraged to accommodate increases in population, households, employment, and travel demand.”<sup>5</sup> Moreover, the 2020-2045 RTP/SCS states that while “[t]ransportation emissions are most prevalent relative to all other sectors in

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<sup>2</sup> CARB, Executive Order G-20-239, Southern California Association of Governments’ (SCAG) 2020 Sustainable Communities Strategy, CARB Acceptance of GHG Quantification Determination, October 30, 2020.

<sup>3</sup> SCAG, 2020-2045 RTP/SCS, September 2020, page 129.

<sup>4</sup> SCAG, 2020-2045 RTP/SCS, September 2020, page 51.

<sup>5</sup> SCAG, Program Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, page 3.8-62.

California and specifically in the SCAG region,” the 2020-2045 RTP/SCS would focus “growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions.”<sup>6</sup> The majority of new housing and job growth is focused in high-quality transit areas (HQTAs) and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development (TOD). This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management TDM measures.

Adopted strategies for the reduction of GHG emissions, as part of the 2012-2035 RTP/SCS, the 2016-2040 RTP/SCS, and the 2020-2045 RTP/SCS have the potential to significantly change the region’s land use and travel patterns to achieve GHG reductions by 2035. Such strategies include (but are not limited to) the following:

- Compact growth in areas accessible to transit;
- Half of all new development on three percent of the region’s land use;
- More multi-family housing, jobs, and housing closer to transit;
- New housing and job growth focused in HQTAs; and
- Investments in biking and walking infrastructure to improve active transportation options and transit access.

According to SCAG, the 2020-2045 RTP/SCS “strengthens the transportation-land use connection through its focus on orienting new housing and job growth in areas served by high quality transit, and into other infill areas where urban infrastructure already exists.”<sup>7</sup> Consistent with the 2020-2045 RTP/SCS, the Project proposes higher density, consistent with compact growth, on a parcel of infill urban land accessible to and well served by public transit including frequent and comprehensive transit services provided by the nearby Metro L Line, which provides convenient access to locations within a multitude of locations throughout the Los Angeles region. The Project Site is also located within walking distance (less than 0.4 miles) of the Metro Regional Connector Little Tokyo/Arts District station, which reopened in June 2023. The Regional Connector Project extends the Metro L Line from the Little Tokyo/Arts District Station to the 7th Street Metro Center Station in Downtown Los Angeles, allowing passengers to transfer to Blue, Expo, Red and Purple Lines, bypassing Union Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District. Three new transit stations will be developed with operation of the Metro Regional

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<sup>6</sup> SCAG, Program Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, pages 3.8-14 and -65.

Connector. The closest new transit station will be located at 1st Street and Central Avenue, less than 0.4 miles north of the Project Site.

The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.

The SCAG objective of locating multi-family housing in proximity to jobs and transit would be accomplished by the Project. New housing and job growth, as a result of the completed the Project, is focused in a Transit Priority Area, which SCAG defines as an area within a half mile of a planned major transit stop. A well-service transit stop is one which has a 15 minute or less service frequency during peak commute hours. As discussed above, The Project would be consistent with this strategy.

The Project would also be consistent with the general land use designation, density, and building intensity outlined by SCAG. SCAG identified the existing General Plan land uses as Industrial and Facilities, with nearby surrounding land uses that include Commercial and Services, Industrial, Facilities, Mixed Residential and Commercial, General Office, and Multi-Family Residential (SCAG Data Request Maps, refer to the attached **Figure 1**). These land uses are typical of urban areas. The 2020-2045 RTP/SCS defines urban areas as “densely developed territory, and encompass residential, commercial and other non-residential urban land uses where population is concentrated over 2,500 people in a given locale.”<sup>8</sup> The 2020-2045 RTP/SCS recognizes that “urban infill development accommodates a higher proportion of growth in more energy-efficient housing types such as townhomes, apartments and smaller single-family homes, as well as more compact and energy efficient commercial buildings.”<sup>9</sup> The Project would develop a mix of residential, hotel, retail/commercial, office, and community uses within 10 distinct buildings. As discussed above in Item 2, the Project would incorporate high performance building envelopes to maximize energy efficiency and high-efficiency fixtures and appliances to optimize building energy performance. The Project buildings would be designed to utilize electricity and not natural gas, and would eliminate the use of a fossil fuel and the associated GHG emissions (i.e., direct natural gas combustion) from building energy demand. As discussed above in Item 4, the Project meets the definition of an “infill” site in PRC Section 21061.3 and is located in an urbanized area as defined in PRC Section 21071. As such, the Project would be consistent with the SCAG’s urban infill development strategy for growth in more energy-efficient housing types and compact and energy efficient commercial buildings. The Project would clearly be located in a highly urbanized area and accommodate growth in energy-efficient multi-family housing types located in an area with existing transportation infrastructure.

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<sup>8</sup> SCAG, 2020-2045 RTP/SCS, September 2020, page 177.

<sup>9</sup> SCAG, 2020-2045 RTP/SCS, September 2020, page 136.



Path: \\usr-file01\GIS-SHARE\GIS\GIS\Projects\19xxx\190422\_400\_S\_Central\_EIR\03\_MXD\Projects\19xxx\190422\_400\_S\_Central\_EIR\Fig 1 - General Plan Land Uses.mxd, sgeis.stler\_9/11/2023

SOURCE: SCAG, 2019; ESRI Imagery.

Fourth & Central Project

**Figure 1**  
General Plan Land Uses

Additionally, SCAG states that the 2020-2045 RTP/SCS “strengthens the transportation-land use connection through its focus on orienting new housing and job growth in areas served by high quality transit, and into other infill areas where urban infrastructure already exists. This more compact and sustainable land use pattern, combined with the transportation network improvements and strategies identified in Connect SoCal, will result in an improved pedestrian and bicycle environment, access to more community amenities, shorter average trip lengths, reduced VMT and better regional air quality.”<sup>10</sup>

The Project would provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces, which is consistent with that required by LAMC Section 12.21.A.16, to encourage non-polluting transportation alternatives. Data from the City shows that within the Central City Community Plan Area, the area in which the Project Site is located, the percentage of workers that commute to work by walking, biking, and public transportation is approximately 37 percent for the area as a whole based on 2010 data.<sup>11</sup> The statewide percentage of workers that commute to work by walking, biking, and public transportation is approximately 9 percent based on census data for 2019.<sup>12</sup> The data indicates that the Project Site area substantially exceeds the statewide average for the percentage of workers that commute to work by walking, biking, and public transportation. The high proportion of workers that commute to work by walking, biking, and public transportation in the Project Site area supports a reasonable expectation that residents and visitors of the Project would have access to and would utilize alternative forms of transportation. Furthermore, as discussed in Item 3, the Project Site is located in an area served by a variety of mobility options and is within walking distance of major transit options. The Project Site is located within walking distance (less than 0.4 miles) of the Metro Regional Connector Little Tokyo/Arts District station, which reopened in June 2023. The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT DASH Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D. The Project would also implement a TDM program to reduce the Project’s single occupant vehicles trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit).

Therefore, the Project would be consistent with the land use designation and the goals of the SCAG 2020-2045 RTP/SCS, which seeks “growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions.”<sup>13</sup> As this information demonstrates, The Project has been proposed in an area where its development can achieve substantial reductions in VMT and associated mobile source emissions relative to the statewide average. The Project’s traffic study also verifies that the

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<sup>10</sup> SCAG, 2020-2045 RTP/SCS, September 2020, page 144.

<sup>11</sup> County of Los Angeles Public Health. Health Atlas for the City of Los Angeles. June 2013. Page 111. Available at: <https://wattscommunitystudio.files.wordpress.com/2013/06/healthatlas.pdf>

<sup>12</sup> U.S. Census Bureau, American FactFinder, Data Set B08301 (Means of Transportation to Work, California, 2019). Available at: <https://data.census.gov/cedsci/table?g=0400000US06&y=2019&hidePreview=true&tid=ACSDT1Y2019.B08301>

<sup>13</sup> SCAG, Program Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, pages 3.8-14 and -65.

proposed development would result in transportation efficiency of at least 15 percent, which also means that the Project would result in a decrease in total daily trips per service population (see **Exhibit 4**). By adhering to SCAG's strategies to reduce VMT and associated GHG emissions, as noted above, the Project serves to fulfill the MPO's determination that the 2020-2045 RTP/SCS meets the adopted GHG reduction targets.

**6. If the project is a multifamily residential project, evidence that (1) private vehicle parking spaces are priced and rented or purchased separately from dwelling units; or (2) the dwelling units are subject to affordability restrictions that prescribe rent or sale prices, and the cost of parking spaces cannot be unbundled from the cost of dwelling units.**

The Project would provide unbundled parking for the residential dwelling units except for the dwelling units subject to affordability restrictions that prescribe rent or sale prices and the cost of parking spaces cannot be unbundled from the cost of the affordable dwelling units.

**7. For projects defined in Public Resources Code Section 21180(b)(2) or 21180(b)(3), information sufficient to enable the Governor to determine that the project meets the criteria set forth in those sections.**

The Project is not a clean renewable energy project that generates electricity exclusively through wind or solar, but not including waste incineration or conversion and is not a clean energy manufacturing project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or for the production of clean alternative fuel vehicles. Therefore, PRC Section 21180(b)(2) or 21180(b)(3) do not apply.

**8. Information establishing that the project entails a minimum investment of \$100 million in California through the time of completion of construction.**

The Project would far exceed the \$100 million minimum investment through the time of completion of construction. The Project would include a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the three Sites totaling approximately 2,318,534 sf, for a floor area ratio (FAR) of 6.95:1. The Project would include: 1,521 residential units, including affordable housing units, totaling approximately 1,731,849 sf; approximately 411,113 sf of office uses; approximately 101,088 sf of restaurant/retail uses (114,112 sf inclusive of outdoor dining/patio space); and, 68 hotel rooms (74,484 sf of hotel floor area). The Project would include approximately 90,113 sf of publicly accessible open space.

Based on construction cost information, the Project's total compensation generated during construction (labor income) is estimated to be \$967.9 million in total compensation paid to workers directly and indirectly associated with construction, of which \$725.0 million would be paid to on-site construction workers. The total economic output is estimated to be \$1.8 billion, of which \$1.1 billion reflects the value of direct Project construction.

Construction of the Project is estimated to generate 14,139 total jobs including direct on-site jobs plus the multiplier effects of indirect and induced jobs, with 10,289 of these jobs estimated to be construction jobs located on-site. These jobs would be available to Californians to help reduce unemployment.

Annual operation of the Project is estimated to generate \$364.9 million in total labor output (wages, salaries, and benefits paid to direct, indirect, and induced workers associated with onsite businesses and household spending). Of this compensation, \$220.9 million is projected to be directly generated onsite by businesses or throughout the local economy by residential spending. It is estimated that the annual operation of the Project would generate a total economic output associated with operations of \$916.6 million in the regional economy, of which \$508.4 million reflects the value of direct project operations and household spending.

Annual operation of the Project is estimated to generate 4,428 total jobs (including direct onsite jobs plus the multiplier effect of indirect and induced jobs). Of these jobs, 2,341 are estimated to be directly created on-site by businesses or in the local economy by residential spending. These jobs would be available to Californians to help reduce unemployment.

A detailed Economic and Fiscal Impact Analysis for the Project, dated January 19, 2023, is attached as **Exhibit 5**.

**9. Information establishing that the prevailing and living wage requirements of Public Resources Code Section 21183(b) will be satisfied.**

The Project would create high-wage, highly skilled jobs that pay prevailing wages and living wages and will comply with all applicable provisions of PRC Section 21183(b). As defined in Section 21183.5, “jobs that pay prevailing wages” means that all construction workers employed in the execution of the project would receive at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. The Applicant will include the prevailing wage requirement in all contracts for the performance of the work. The Applicant will enter into a local construction Master Labor Agreement with the Unions affiliated with the Los Angeles/Orange Counties Building and Construction Trades Council specifically to fulfill the requirements of Section 21183. A copy of the executed Fourth and Central PLA Letter of Commitment is attached as **Exhibit 6**.

**10. Information establishing that the project will not result in any net additional greenhouse gas emissions, including greenhouse gas emissions from employee transportation.**

The Project would not result in any net additional GHG emissions due to a variety of contributing factors, including the change from the GHG-intensive existing land use of warehouse and trucking at the North Site. The proposed methodology and modeling data and assumptions for quantifying the project’s construction and operational GHG emissions is attached as **Exhibit 7**. Construction of the Project would result in one-time GHG emissions of carbon dioxide (CO<sub>2</sub>) and smaller amounts of methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) from heavy-duty construction equipment, haul trucks, and worker vehicles. Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the off-road and on-road emissions factors. The emissions are estimated using the California Emissions Estimator Model (CalEEMod), which incorporates the CARB off-road emissions factor model, OFFROAD, and the on-road emissions factor model, EMFAC2021. The output values used in this analysis are adjusted to be Project-specific based on expected equipment types and the construction schedule. These values are applied to the

construction phasing assumptions to generate GHG emissions values for each construction year. The CalEEMod tool provides options for specifying equipment, horsepower ratings, load factors, and operational hours per day. Since a specific construction contractor(s) has not yet been retained for the Project, specific equipment specifications, such as engine horsepower ratings and load factors, are not yet known. Therefore, air district recommended default equipment and vehicle horsepower ratings and load factors provided in CalEEMod are used in this assessment. The use of these CalEEMod factors is recognized as providing a reasonably conservative estimate of a project's construction emissions. Construction of the Project would occur over a number of phases and include activities such as demolition, debris and soil hauling, building construction, architectural coating, and paving. The construction phases are not independent of each other, as there may be overlap and efficiency built into the construction process. Information regarding the activities that would occur during these phases is provided below:

Project construction is anticipated to commence as early as 2025 and could be completed within approximately 5 years under a maximum development scenario. Construction activities within the North, South and West Sites would be phased to maximize construction efficiency. As part of the Project construction activities, all on-site buildings and associated infrastructure (i.e., surface parking, sidewalks, landscaping, etc.) would be removed on the South and West Site. On the North Site, a portion of the existing six-story cold storage building at 715 4th Street is intended to be adaptively reused to provide new restaurant/retail uses and residential amenities.<sup>14</sup> The remainder of the six-story warehouse and the existing 1-story warehouse building component on the North Site would be removed during Project construction activities.

Due to the overall size of the Project Site being over 7 acres and the phased construction, there will be opportunities in the early phases of construction to utilize on-site areas for construction staging, laydown of equipment and materials and construction worker parking. As the Project becomes more built out, there will be more opportunities to provide on-site worker parking in the constructed structured parking, but staging and laydown areas will be more limited. Throughout construction, and in particular during the later phases a combination of adjacent right-of-way and use of neighboring properties through private agreements may be utilized for these purposes. Lane closures and sidewalk closures will be phased throughout construction to provide access around the Project Site, ongoing pedestrian access throughout the neighborhood and to access areas under construction. With the buildings planned to be constructed up to the adjacent right-of-way lines, the need for sidewalk and lane closures will exist concurrent with construction of each building.

Overall, construction would include up to approximately 651,000 cubic yards (CY) of grading (cut), including 105,000 CY within the North Site, 534,000 CY in the South Site and 12,000 CY in the West Site, all of which would be exported from the Project Site, with excavations depths to approximately 57 feet

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<sup>14</sup> For purposes of this analysis and to provide a worst-case, conservative assessment of potential environmental impacts, such as construction GHG emissions, the Project is assumed to demolish the entire six-story cold storage warehouse building and attached single-story warehouse on the North Site. Whether a portion of the six-story cold storage warehouse building on the North Site is adaptively reused or not, the development programming on the North Site (and Project) would remain similar under either development scenario.

below the ground surface (bgs) for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits.

Operation of the Project would generate GHG emissions from vehicles traveling to and from the Project Site, area sources (landscaping equipment) energy demand (electricity), water demand, and solid waste generation. The Project is expected to observe reductions in GHG usage by removing the existing GHG-intensive warehouse land use and replacing it with the mixed-use land use of the Project.

Additionally, physical and operational land use characteristics and green building features for which sufficient data is available to quantify the reductions from building energy and resource consumption are accounted for in the quantitative analysis, and include but are not limited to the following measures described below.

**Land Use Characteristics:** The Project includes a mix of residential, hotel, office uses and neighborhood serving commercial uses (restaurant, retail, etc.) located at the ground level, which would provide convenient local destinations for the residential element of the Project without having to drive to other locations. The mix of uses on and around the Project Site provides for internal capture of vehicle trips that would otherwise occur without the mix of uses. The Project is also located in a highly-walkable area in the Little Tokyo and the Arts District communities with a high level of provision of bicycle facilities and excellent access to high-quality transit service in Los Angeles that will provide convenient access to local employment, shopping and entertainment opportunities without using a car for the residents of the Project. The Project is located in an area well served by multi-modal transportation options and in close proximity to services, which reduces VMT from private automobiles. The Project Site is less than 0.5 miles from the Metro Regional Connector Little Tokyo/Arts District station, which reopened in 2023. The Regional Connector Project extends the Metro L Line from the Little Tokyo/Arts District Station to the 7th Street Metro Center Station in Downtown Los Angeles, allowing passengers to transfer to Blue, Expo, Red and Purple Lines, bypassing Union Station. The 1.9-mile alignment will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District. The closest bus stop to the Project Site is located at Alameda Street and 4th Street, approximately 100 feet northeast of the Project Site, which is served by the LADOT Downtown Area Short Hop (DASH) Route A, which is a downtown route that connects the Arts District and Little Tokyo with the rest of Downtown Los Angeles. Other bus lines in the vicinity of the Project Site include Metro bus lines 16, 18, 53, 50, 62, 72, and 760 and LADOT DASH Route D.

The Project Site is also an infill location in close proximity (i.e., within one-half mile) to a number of services like restaurant, grocery, laundry/cleaner, movie theater, fitness center uses and other service uses. The Project would also implement a TDM Program that would provide new on-site residents and employees with transit information, on-site bicycle amenities (bicycle racks, lockers, showers, etc.), unbundle residential parking, and other measures to encourage the use of non-auto modes and reduce vehicle trips to and from the Project Site. These characteristics result in a substantial reduction in VMT compared to the regional average.

**Green Building Features:** The Project will achieve at least the USGBC LEED Gold Certification and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. As discussed above, the Project

would include design features that would reduce energy and water use, promote resource conservation through redevelopment and the sourcing of local construction materials, and create healthier indoor environments. The Project would achieve the requirement to meet the USGBC LEED Gold Certification. A detailed analysis of the Project's ability to achieve LEED Gold Certification is provided in Sustainability Basis of Design documents for Office and Retail, Hotel, and Multi-Family Highrise provided in **Exhibit 3**. Additionally, the Project buildings would be designed to utilize electricity and not natural gas. Accordingly, natural gas would not be supplied to support Project building operations related to building energy. While building electrification would result in higher electricity usage, since traditionally natural gas appliances and equipment would instead be electrified, the Project buildings would eliminate the use of a fossil fuel and the associated GHG emissions (i.e., direct natural gas combustion) from building energy demand. The Project would not result in installation of any new natural gas infrastructure.

Detailed GHG emissions calculations demonstrating a net zero increase in GHG emissions is attached as **Exhibit 7**.

**11. Information establishing that the project will comply with requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with Public Resources Code Section 42649) and 12.9 (commencing with Public Resources Code Section 42649.8), as applicable.**

With respect to municipal solid waste, the State has enacted regulations to address solid waste services and recycling. PRC, Division 30, Part 3 Chapter 12.8, Section 42649 et seq. requires businesses that produce four cubic yards or more of solid waste per week or multifamily residential dwellings of five units or more to arrange for recycling services that are consistent with state or local laws or requirements, including a local ordinance or agreement, applicable to the collection, handling, or recycling of solid waste, to the extent that these services are offered and reasonably available from a local service provider. In addition, PRC, Division 30, Part 3 Chapter 12.9, Section 42649.8 et seq. requires after January 1, 2020, if the department determines that statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, a business that generates two cubic yards or more per week of commercial solid waste is required to arrange for organic waste recycling services that include at least one of the following actions: (1) source separate of organic waste from other waste and subscribe to a basic level of organic waste recycling service that includes collection and recycling of organic waste, (2) recycle its organic waste on-site or self-haul its own organic waste for recycling, (3) subscribe to an organic waste recycling service that may include mixed waste processing that specifically recycles organic waste, (4) make other arrangements to meet the organic waste requirements of a local governmental agency that are more stringent or comprehensive than the requirements of Chapter 12.9, unless the department determines that this requirement will not result in significant additional reductions of organics disposal.

The City has developed and is in the process of implementing the *Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan*, also referred to as the City's Zero Waste Plan, whose goal is to lead Los Angeles towards being a "zero waste" City by 2030.<sup>15</sup> These waste reduction plans, policies, and regulations, along with Mayoral and City Council directives, have increased the level of waste diversion

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<sup>15</sup> City of Los Angeles, Solid Waste Integrated Resources Plan (SWIRP), A Zero Waste Master Plan, October 2013.

(e.g., recycling) for the City to 76 percent as of 2013.<sup>16</sup> The City has also approved Ordinance No. 181519 (LAMC Sections 66.32-66.32.5), which requires the diversion of mixed construction and demolition debris to City certified construction and demolition waste processors. The Project would be consistent with the City and State waste requirements by utilizing waste collection services that are approved by the City and that meet the applicable requirements for waste diversion and recycling mandates. The City generally relies on single-stream waste recycling where mixed waste is collected and sorted for recycling at a waste reclamation facility. The Project would subscribe to a municipal solid waste collection service that is approved by the City and that meets applicable City and State waste collection, management, recycling and diversion requirements.

**12. Information documenting a binding agreement between the project proponent and the lead agency establishing the requirements set forth in Public Resources Code Sections 21183(e) (all mitigation measures will be conditions of approval and enforceable, and environmental mitigation measures will be monitored and enforced for the life of the obligation), (f) (applicant will pay costs for hearing by Court of Appeal), and (g) (applicant will pay costs of preparing the record or proceedings).**

The letter of acknowledgement of obligations and binding agreement between the Applicant and the City of Los Angeles is provided in **Exhibit 8**.

## **Consistency with Planning Goals, Policies and Objectives of the City of Los Angeles**

The Project Site, which is within the planning boundary of the Central City Community Plan, has a General Plan land use designation of Light Manufacturing and is zoned M2-2D-O on the North Site and M2-2D on the South and West Sites. This zoning permits a range of industrial uses prevalent in the area such as warehouses and cold storage facilities, and also permits commercial and office uses. The “2D” indicates Height District 2D, which does not limit the height of buildings on these properties, but limits the FAR to 3:1. The “O” designation indicates that the Project Site is located within an oil drilling district where the drilling of oil wells or the production from wells of oil, gas, or other hydrocarbon substances is permitted.

The Project Site is located within a State Enterprise Zone (City of Los Angeles Department of City Planning Zoning Information [ZI] No. 2374) and the Greater Downtown Housing Incentive Area (City of Los Angeles Department of City Planning ZI No. 2385), which were both established to stimulate local investment. State Enterprise Zones provide business owners within the Zone boundaries with State incentives such as tax credits and deductions for hiring eligible employees, credits for sales and use taxes paid on qualifying machinery and electronic equipment, additional business expense deductions, and credits to lenders for loans made to Enterprise Zone businesses. The Greater Downtown Housing Incentive Area was created to incentivize housing development within the boundaries of the area. [Los Angeles Municipal Code (LAMC), § 12.22-A.29.] The Greater Downtown Housing Incentive Area was adopted with the intent

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<sup>16</sup> City of Los Angeles, Solid Waste Integrated Resources Plan (SWIRP), A Zero Waste Master Plan, page 1, October 2013.

of not only incentivizing the development of additional housing, but to also facilitate the development of affordable and workforce housing within the area.

The North Site and West Site are also located within the boundaries of the Central Industrial Redevelopment Project area, as designated by the now-defunct Community Redevelopment Agency for the City of Los Angeles (CRA/LA). The redevelopment plan for the Central Industrial Redevelopment Project was adopted on November 15, 2002, and expires in November 2032.

On September 30, 2019, the City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325, transferring the land use authority from the former CRA/LA to the City. The City is now responsible for implementing and enforcing unexpired redevelopment plans and associated development guidelines. As such, the City is the presiding agency for all land use approvals within the Central Industrial Redevelopment Project area.

The City of Los Angeles Department of City Planning ZI No. 2452 [Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA] was developed in response to SB 743, which, pursuant to Section 21099(d)(1) of the PRC, states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a TPA. PRC Section 21099 defines the criteria for an infill site and TPAs. Specifically, "infill site" is defined as a location within an urban area that has been previously developed, or a vacant site "where at least 75 percent of the perimeter of the site adjoins an improved public right-of-way. "TPAs" are defined as areas within 0.5 miles of a major transit stop that is existing or planned. A "major transit stop" is defined as a site containing an existing rail transit station 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. Under ZI No. 2452, a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than 0.5 miles from the major transit stop.

The Project proposes the development of a cohesive mix of residential, hotel, retail/commercial, office, and community uses on a previously developed "infill" site. The entire Project Site is located within approximately 0.5 miles of the Metro L Line Little Tokyo/Arts District Station at East 1st Street and Central Avenue to the north of the Project Site. As such, the Project would meet the criteria of SB 743 and ZI No. 2542. As discussed in ZI No. 2542, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas, and any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact, unless evaluation is required under other land use regulations of the LAMC.

The Project is consistent with many of the goals, policies and objectives of the City's General Plan and the Housing Element as explained below. In addition, all entitlements being considered for approval by the City conform with the appropriate sections set forth in the LAMC and the underlying zoning.

## General Plan Framework

The General Plan Framework includes the following goals, objectives and policies relevant to the proposed mixed-use development:

**Objective 3.1:** Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors.

**Policy 3.1.1:** Identify areas on the Land Use Diagram and the Community Plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.

The Project would include: 1,521 residential units, including affordable housing units, totaling approximately 1,731,849 sf; approximately 411,113 sf of office uses; approximately 101,088 sf of restaurant/retail uses (114,112 sf inclusive of outdoor dining/patio space); and, 68 hotel rooms (74,484 sf of hotel floor area). The Project would include approximately 90,113 sf of publicly accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The range of housing types and commercial uses represent a diverse mix of land uses that would support the needs of the City’s existing and future residents, businesses, and visitors. The local community is a jobs-rich area and providing more residential uses on the Project Site would provide for needed housing in the City, particularly housing in close proximity to multi-modal transportation options.

The Framework Element Land Use Diagram(s) designate(s) districts, centers and mixed-use boulevards that are encouraged to develop with appropriate uses and character for their land use designations. The Project Site is located in an area that is identified as a “Regional Center” and targeted for high density growth on the General Plan Framework’s Land Use Diagram. Development of the Project would support the intent of the Regional Center designation by providing a mix of uses that provide employment opportunities and enhance commercial services. The provision of residential units at this Hollywood location would serve the needs of existing and future residents, would expand the diversity within the designated Regional Center, and provide housing in close proximity to commercial, retail, entertainment, and restaurant uses. The provision of office uses at this location would serve the needs of existing and future residents, would also expand the diversity within the designated Regional Center, and provide employment opportunities in close proximity to existing residential uses. The provision of the neighborhood serving commercial uses within the Project Site that would be accessible at ground-level would support the Project Site’s residents as well as other off-site residents, tourists, and visitors in the area by providing commercial services in a walkable environment.

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

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

The Project would contribute to the concentration of mixed-use development along a corridor with convenient access to the Metro L Line (approximately 600 feet south of the Project Site), Metro bus and

Metro rapid bus lines, and the LADOT DASH lines. The Project would include public paseos providing contiguous pedestrian access, passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. The Project would also provide up to 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces for on-site residents and the on-site commercial uses. The new residential population would have access to commercial development on site as well as retail, restaurant, office, and entertainment activities within walking and biking distance and via bus and rail service.

The Project's location, design, and specific features, including its proximity to high-capacity and high-frequency transit, commercial uses easily accessible from the ground-level, and implementation of a TDM program, will reduce the use of single occupant vehicles and increase the number of trips by walking, bicycle, carpool, vanpool, and transit. As demonstrated in **Exhibit 4**, the Project would reduce the Project's estimated daily vehicular trip generation estimates by at least 15 percent as compared to a comparable mixed-use project. To achieve the 15 percent or greater transportation efficiency metric, the Project will implement a TDM program to reduce the Project's single occupant vehicles trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM program will include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. Refer to **Exhibit 4** for a list of TDM measures.

**Objective 3.16:** Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

The Project would provide approximately 90,113 sf of publicly accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. Amenities provided throughout the open space area would include trees, landscape, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). There are a total of 12 individually curated publicly accessible open space areas. The addition of trees, landscaping, and streetscaping would enhance the Project Site and make it more inviting for pedestrian activity. The Project would also include neighborhood serving commercial uses easily accessible from the ground-level, which would also enhance pedestrian activity.

## **Housing Element 2021-2029**

The Project is consistent with goals, objectives and policies of the Housing Element 2019-2029, adopted by the Los Angeles City Council on November 24, 2021. The City is committed to providing affordable housing and amenity-rich sustainable neighborhoods for its residents, answering the variety of housing needs of its growing population. The purpose of the General Plan Housing Element is to provide guidance for meeting the City's need for housing per the allocation defined in SCAG's Regional Housing Needs Assessment.

The Housing Element 2021-2029 includes the following goals, objectives and policies relevant to the proposed mixed-use development:

**Goal 1:** A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.

**Objective 1.2:** Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.

**Policy 1.2.1:** Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs.

**Policy 1.2.2:** Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.

**Objective 1.3:** Promote a more equitable distribution of affordable housing opportunities throughout the city, with a focus on increasing Affordable Housing in Higher Opportunity Areas and in ways that further Citywide Housing Priorities.

**Policy 1.3.1:** Prioritize housing capacity, resources, policies and incentives to include Affordable Housing in residential development, particularly near transit, jobs, and in Higher Opportunity Areas.

**Policy 1.3.2:** Prioritize the development of new Affordable Housing in all communities, particularly those that currently have fewer Affordable units.

The Project would result in population growth directly through the introduction of 1,521 housing units on the Project Site which currently has no residential uses. This growth would contribute towards the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. The Project would provide a range of housing types, including for-rent and for-sale units, for all family types including studio, 1-, 2-, and 3-bedroom units.

**Goal 3:** A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

**Objective 3.1:** Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.

**Policy 3.1.5:** Develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements in development of a project and within the public and private realm such as shade trees, parkways and comfortable sidewalks.

**Policy 3.1.7:** Promote complete neighborhoods by planning for housing that includes open space, and other amenities.

**Objective 3.2:** Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.

**Policy 3.2.1:** Promote the integration of housing with other compatible land uses at both the building and neighborhood level.

**Policy 3.2.2:** Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.

**Policy 3.2.4:** Provide streamlining, incentives and flexibility for residential buildings that promote energy and resource conservation particularly those that exceed existing green building standards.

**Policy 3.2.5:** Promote and facilitate the reduction of water, energy, carbon and waste consumption in new and existing housing.

The Project would provide 90,113 sf of publicly accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site that would provide linkages to the surrounding pedestrian walkways. The Project would also provide 408 new trees on the Project Site increasing the passive solar shading available to pedestrians. The Project's open space and connective design would create a sense of place and encourage walking and physical activity. Furthermore, Policy 3.2.2 of the Housing Element states that the City should "Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions."<sup>17</sup> As previously indicated, the Project Site is located within a TPA and a SCAG-designated HQT. The Project Site's accessibility to transit would promote walking and non-automotive transportation and help the City increase housing within transit priority areas. The Project would provide 742 bicycle parking spaces, with approximately 146 short-term spaces and 596 long-term spaces to further encourage non-automotive modes of transportation.

The Project will also achieve the USGBC LEED Gold Certification and include design features that would reduce energy and water use, promote resource conservation through redevelopment and the sourcing of local construction materials, and create healthier indoor environments. A detailed analysis of the Project's ability to achieve LEED Gold Certification is provided in Sustainability Basis of Design documents for Office and Retail, Hotel, and Multi-Family Highrise provided in **Exhibit 3**.

**Goal 4:** A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

**Objective 4.1:** Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, color, ancestry, sex, national origin, color, religion, sexual orientation, gender identity, marital status, immigration status, family status, age, intellectual, developmental, and physical disability, source of income and student status or other arbitrary reason.

**Policy 4.1.1:** Promote and facilitate equal opportunity practices in the construction, provision, sale and rental of housing.

**Policy 4.1.3:** Ensure that people with disabilities have an equal opportunity to rent, use, and enjoy Affordable Housing that has received financial or other assistance from the City or the former CRA/LA.

**Policy 4.1.5:** Eliminate housing accessibility barriers that disproportionately affect populations in protected classes and special needs populations.

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<sup>17</sup> City of Los Angeles Department of City Planning, Housing Element 2021-2029, Chapter 6, page 252.

The Project would comply with applicable federal, state, and local laws and ordinances regarding housing anti-discrimination and Americans with Disabilities Act (ADA) requirements. The Project would include 1,521 residential units, including affordable housing units. The Project would also create high-wage, highly skilled jobs that pay prevailing wages and living wages and will comply with all applicable provisions of PRC Section 21183(b) and the prevailing wage requirement. The Applicant will include the prevailing wage requirement in all contracts for the performance of the work. The Applicant will enter into a local construction Master Labor Agreement with the Unions affiliated with the Los Angeles/Orange Counties Building and Construction Trades Council specifically to fulfill the requirements of Section 21183.