

## **IV. Environmental Impact Analysis**

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### **H. Land Use and Planning**

#### **1. Introduction**

This section addresses the consistency of the Project with local and regional land use plans and policies. As described throughout this Draft EIR, while the Project Site is located within the City of Los Angeles (City), the Ford Theatres are owned and operated by the County of Los Angeles (County). Accordingly, development of the Project Site is governed by the County General Plan and the Los Angeles County Code. Notwithstanding, in accordance with City consultation procedures, a consistency analysis with relevant policies of the City General Plan is also provided herein.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) County of Los Angeles**

###### *(a) County of Los Angeles General Plan*

The County General Plan was approved by the Los Angeles County Board of Supervisors in November 1980. The County General Plan contains a number of elements that address specific issues and establish various goals, policies, and objectives that pertain to the County as a whole. These General Plan elements, several of which were updated or amended between 1987 and 2008, guide the County's land use policies. The County is in the process of updating its General Plan, and a Draft General Plan, which focuses on the unincorporated areas of the County and does not include the Project Site, has been issued. The following adopted General Plan elements are applicable to the Project: General Goals and Policies; Conservation and Open Space; Land Use; Transportation; Water and Waste Management; and Safety. Each of these General Plan elements are described below. The policies within each of these elements that are applicable to the Project are listed in Table IV.H-1 on page IV.H-15 in the analysis of impacts below.

The General Goals and Policies Chapter of the County General Plan outlines broad goals and policies applicable on a County-wide level.

The Conservation and Open Space Element sets policy direction for the open space-related resources in the County. These resources include land and water areas devoted to recreation, scenic beauty, conservation, and the use of natural resources. To protect areas of significant natural resources, the Conservation and Open Space Element recommends the retention of non-urban or open space areas. The Conservation and Open Space Element also has goals to protect sites of historical, archaeological, scenic, and scientific value.

The Land Use Element sets forth policies for the general location, distribution, and intensity of land use. The Land Use Element serves as a tool for coordinating future development within both the private and public sectors. The Land Use Element also reinforces General Plan policies for conserving natural and ecological resources and protecting County residents from natural hazards through careful management of development in sensitive areas.

The Transportation Element of the County General Plan sets forth policies for the continued development of a comprehensive transportation system for Los Angeles County. The Transportation Element concurs with the policy positions of the Los Angeles County Metropolitan Transit Authority (Metro) and the Southern California Association of Governments (SCAG) on the need for the continued development and construction of a comprehensive public transportation system. The Transportation Element also reflects the location of existing and future transit corridors. Key features of the Transportation Element are the Transportation Plan, Highway Plan, and Bikeway Plan, as well as the associated Transportation Policy Map and the Highway Policy Map. These policy maps depict the existing transportation system and identify needed additions and improvements, in accordance with the General Plan's growth and development policies.

The Water and Waste Management Element addresses water resources and their availability and identifies standards and guidelines for their distribution and conservation. The Water and Waste Management Element also addresses solid waste management, landfill operation, and recycling opportunities critical to the County, as well as issues relating to flood control, aquifer replenishment, sewerage, and water reclamation systems.

The Safety Element represents the long-range emergency response plan for the County and addresses the protection of people from unreasonable risks associated with natural disasters. It seeks to reduce future loss of life, injuries, and socioeconomic disruption from other safety issues, including the management of hazardous materials. The Safety Element addresses the following issues: seismic hazards, geologic hazards, wildland and urban fires, management of hazardous materials, emergency response resources, and safety-oriented research.

*(b) Los Angeles County Code*

The Los Angeles County Planning and Zoning Code (Chapter 22 of the Los Angeles County Code) regulates development of unincorporated areas of the County through land use designations and development standards regarding allowable uses, density, height, and design. Although the Project Site is located within the City of Los Angeles, since the Project Site is owned and operated by the County, the Project would be built in accordance with Los Angeles County Code building design requirements and compliance with City land use and zoning designations would not be required, as discussed further below.

*(c) Los Angeles County Hillside Requirements*

A variety of hillside requirements apply throughout Los Angeles County. Within the adopted General Plan, Appendix A of the Land Use Element provides Hillside Management/Performance Review procedures for non-residential development projects in hillside areas. The review process is intended to ensure site suitability, public safety, and resource protection, and protect scenic and open lands. Among the uses permitted in hillside areas are industrial, limited commercial, and “certain research, development, and product testing facilities requiring the seclusion afforded by hillside terrain,” as well as various agricultural, mineral extraction, and utility uses.

## (2) City of Los Angeles

*(a) City of Los Angeles General Plan*

The City General Plan is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development. The City General Plan sets forth goals, objectives and programs to guide land use policies and to meet the existing and future needs of the community. The City General Plan consists of a series of documents which includes the seven State-mandated elements: Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City’s General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, Public Facilities and Services, and the Citywide General Plan Framework Element. The Land Use Element comprises 35 local area plans known as Community Plans that guide land use at the local level. The Project Site is located within the boundaries of the Hollywood Community Plan area.

The City General Plan Elements relevant to the Project include: General Plan Framework; Land Use (Hollywood Community Plan); Conservation; and Open Space. A brief description of each of these elements is provided below. In addition, a list of relevant policies from the relevant elements of the City General Plan and a consistency analysis of

the Project with these policies is provided in Table IV.H-2 on page IV.H-26 in the impact analysis below.

*(i) Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines Citywide policies. The policies are organized by chapters that address land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

*(ii) Hollywood Community Plan and Update*

The Project Site is located within the Hollywood Community Plan area. Adopted on December 13, 1988, the specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Hollywood Community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible. The Hollywood Community Plan designates the Project Site for Public Facilities.

An update to the Hollywood Community Plan (Community Plan Update) was adopted by the City Council on June 19, 2012 (Ordinance No. 182,173). The Community Plan Update includes General Plan land use designation amendments and zone and height district changes for the Community Plan area that went into effect on August 6, 2012. The Community Plan Update did not result in any changes to the zoning or land use designations on the Project Site. The Project Site continues to be designated for Public Facilities by the Community Plan Update. However, the Community Plan Update, and its environmental review process, was subsequently challenged in court. The Los Angeles Superior Court issued a tentative decision to rescind the Community Plan Update and further court action is anticipated. In the interim, the City has revived the Hollywood Community Plan and the zoning ordinances that existed immediately prior to adoption of the Community Plan Update.

The Community Plan Update was developed to set a new direction for the future of Hollywood.<sup>1</sup> A wide range of planning topics, including land use and housing, parks and open space, urban design, mobility, arts and culture, and history, are addressed. In particular, the Community Plan Update is intended to focus growth and promote mixed-use development around transit hubs, reinforce Hollywood's role as a media and entertainment employment center, provide for mobility options, establish new lower height limits, protect hillsides from over-development, promote streetscape plans and implement new street standards, expand Historic Preservation Districts, regulate the scale and design of development, establish urban design guidelines, fund a nexus study to establish trip fees and finance regional mobility improvements, and promote pedestrian-oriented design overlays.<sup>2</sup> The Community Plan Update also contains an Urban Design Guidelines chapter, which includes policies that establish baseline design guidelines for Hollywood. The goal of the Urban Design Guidelines is to guide the physical development of the Community Plan area effectively in order to enhance the experience of all individuals who live, work, or visit in the area.

### *(iii) Conservation Element*

The Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources, including agricultural lands; animal keeping uses, nurseries, and crop gardens; endangered species; equine areas; protection from erosion; fisheries; forests; habitat areas; mineral resources; fossil fuels; and water. The Conservation Element also has goals to protect sites of cultural, historical, archaeological, paleontological, and scenic value.

### *(iv) Open Space Element*

The Open Space Element provides goals, objectives, and policies for the preservation of open space resources in the City. These resources include open space which is free of structures and buildings and/or is natural in character and provides opportunities for recreation and education; preserves scenic, cultural or historic values; conserves or preserves natural resources or ecologically important areas; provides or preserves lands for managed production of natural resources; protects or provides for the public health and safety; enhances the economic base of the City; preserves or creates community scale and identity; and buffers or defines activity areas.

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<sup>1</sup> *Exhibit B: Hollywood Community Plan Proposed Plan Text, February 17, 2012, page 14, [http://cityplanning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20B\\_Hollywood%20Community%20Plan%20Proposed%20Plan%20Text%20-%20Approved%20by%20CPC.pdf](http://cityplanning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20B_Hollywood%20Community%20Plan%20Proposed%20Plan%20Text%20-%20Approved%20by%20CPC.pdf), accessed April 9, 2013.*

<sup>2</sup> *How Does the Hollywood Community Plan Improve Hollywood?, Los Angeles Department of City Planning, [http://cityplanning.lacity.org/cpu/hollywood/June21/FactSheet\\_5\\_22\\_edit21.pdf](http://cityplanning.lacity.org/cpu/hollywood/June21/FactSheet_5_22_edit21.pdf), accessed October 21, 2012.*

*(b) Los Angeles Municipal Code*

Chapter 1 of the City of Los Angeles Municipal Code contains the City's Planning and Zoning Code. The Planning and Zoning Code sets forth development standards and regulations for the City's designated land use zones. As set forth in the LAMC, the Project Site is zoned [Q]PF-1XL-H (Qualified Public Facilities, Height District 1XL, Hillside Area). In accordance with the LAMC, uses permitted within the PF zone include farming and nurseries, public parking facilities, fire stations and police stations, government buildings, structures, offices and service facilities including maintenance yards, public libraries, post offices, public health facilities, and public elementary and secondary schools. Buildings or structures within Height District 1XL may not exceed two stories nor shall the highest point of the roof of any building or structure exceed 30 feet in height.

*(c) Mulholland Scenic Parkway Specific Plan*

The Mulholland Scenic Parkway Specific Plan was adopted on May 13, 1992, as part of the City's General Plan in order to protect the views and natural character of Mulholland Drive along the crest of the Santa Monica Mountains. A buffer area including and paralleling much of Mulholland Drive has been designated as the Mulholland Scenic Parkway. The Mulholland Scenic Parkway Specific Plan prescribes numerous special regulations that address site use, building design, and construction procedures for all projects located within the Mulholland Scenic Parkway. The Specific Plan designates a 500-foot buffer from the right-of-way along both sides of Mulholland Drive as the Inner Corridor of the Specific Plan area. The area extending 0.5 miles from the Mulholland Drive right-of-way, excluding the Inner Corridor, is designated as the Outer Corridor of the Specific Plan area. The Specific Plan also designates an Institutional Use Corridor (within the Inner Corridor), which provides for uses such as schools, churches, and accessory buildings.<sup>3</sup> A portion of the Project Site lies within the Outer Corridor of the Specific Plan. The Specific Plan specifies a height limit of 40 feet for buildings located within the Outer Corridor. The Specific Plan also sets forth grading provisions and environmental protection measures regarding prominent ridges, streams, parklands, oak trees, and archaeological and paleontological resources. However, as previously noted, since the Project Site is owned and operated by the County, the Project would be built in accordance with Los Angeles County Code building design requirements and compliance with City land use provisions is not required.

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<sup>3</sup> *The Institutional Use Corridor extends from the centerline of Corda Drive on the west to the centerline of Roscomare Road on the east, excluding the San Diego Freeway.*

### (3) Regional

Regional land use plans that govern the Project Site and surrounding area include the Southern California Association of Governments' (SCAG) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), Growth Vision Report, and Regional Comprehensive Plan (RCP); the Los Angeles County Congestion Management Program, administered by the Los Angeles County Metropolitan Transportation Authority (Metro), which regulates regional traffic issues; and the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), which addresses attainment of State and federal ambient air quality standards throughout the South Coast Air Basin (Basin).

#### (a) *SCAG Regional Transportation Plan/Sustainable Communities Strategy*

SCAG is the federally designated metropolitan planning organization for six Southern California counties, including the County of Los Angeles. SCAG is mandated to create plans for transportation, growth management, hazardous waste management, and air quality. On April 4, 2012, the SCAG Regional Council adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy, the mission of which is “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.”<sup>4</sup> In contrast to previous versions of the RTP, the new plan places a greater emphasis on sustainability and integrated planning and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of this new approach, the 2012–2035 RTP/SCS establishes commitments to: reduce emissions from transportation sources in order to comply with Senate Bill (SB) 375; improve public health; and meet the National Ambient Air Quality Standards. Accordingly, within its 2012–2035 RTP/SCS, SCAG has identified regional goals that reflect a balanced approach to transportation planning and decision-making. These goals are intended to link the issue of mobility with the promotion of economic development, protection of the environment, reductions in energy consumption, the creation of transportation-friendly development patterns, and encouragement of fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. In support of these goals, the 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.<sup>5</sup> Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. While the Project

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<sup>4</sup> SCAG 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy, p. viii, available at <http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx>, accessed April 29, 2014.

<sup>5</sup> *Ibid*, p. 114.

Site itself is not located within a High-Quality Transit Area, the Hollywood Freeway and other nearby areas are within a High-Quality Transit Area.<sup>6</sup> Nonetheless, several of the regional goals and guiding policies established in the 2012–2035 RTP/SCS are applicable to the Project, as discussed in Table IV.H-3 on page IV.H-36 in the impact analysis below.

*(b) SCAG Growth Vision Report*

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has collaborated with interdependent sub-regions, counties, cities, communities, and neighborhoods in a process referred to by SCAG as Southern California Compass, which resulted in the development of a shared Compass Growth Vision for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG began Compass in 2002, spearheaded by the Growth Visioning Subcommittee, which consists of civic leaders from throughout the region. The shared regional vision sought to address issues such as congestion and housing availability, which may threaten the region's livability.

The underlying goal of the growth visioning effort is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity or income. To organize the strategies for improving the quality of life in the SCAG region, a series of principles was established by the Growth Vision Subcommittee. These goals are contained in the Growth Vision Report. The four principles are intended to promote and maximize regional mobility, livability, prosperity and sustainability. Decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies also are provided as a way to achieve each of the principles. The Project's consistency with applicable goals of the Growth Vision is provided in Table IV.H-3 on page IV.H-36 in the impact analysis below.

*(c) SCAG Regional Comprehensive Plan*

SCAG has also prepared and issued the 2008 Regional Comprehensive Plan in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.<sup>7</sup> The Regional Comprehensive Plan is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The Regional Comprehensive Plan may be voluntarily used by local jurisdictions in developing local plans and addressing local

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<sup>6</sup> *Ibid*, Exhibit 4.9: High-Quality Transit Areas (HQTA) SCAG Region, p. 136.

<sup>7</sup> SCAG, 2008 Regional Comprehensive Plan, [www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP\\_ExecSum.pdf](http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_ExecSum.pdf), accessed April 29, 2014.



issues of regional significance. The plan incorporates principles and goals of the Compass Blueprint Growth Vision and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained in the Regional Comprehensive Plan provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 Regional Comprehensive Plan replaced the SCAG's 1996 Regional Comprehensive Plan and Guide for use in SCAG's Intergovernmental Review process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the Regional Comprehensive Plan, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the Regional Comprehensive Plan is not used in SCAG's Intergovernmental Review process. Rather, SCAG reviews new regional projects based on consistency with the 2012–2035 RTP/SCS and Compass Growth Vision.<sup>8</sup>

The Project's consistency with applicable goals and policies of the RCP is analyzed in Table IV.H-4 on page IV.H-40 in the impact analysis below.

*(d) SCAQMD Air Quality Management Plan*

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for bringing air quality in the South Coast Air Basin into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. The 2012 Air Quality Management Plan incorporates the latest scientific and technological information and planning assumptions, including SCAG's 2012–2035 RTP/SCS and updated emission inventory methodologies for various source categories. The 2012 Air Quality Management Plan also includes the new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches. The Air Quality Management Plan provides policies and measures to guide responsible agencies in

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<sup>8</sup> *Prior to publication of the 2008 Regional Transportation Plan, projects considered to be regionally significant based on the SCAG criteria were required to provide an analysis of consistency with the 1996 Regional Comprehensive Plan and Guide goals and policies. However, SCAG now considers the Regional Comprehensive Plan and Guide superseded by the 2012–2035 RTP/SCS.*

achieving federal standards for healthful air quality in the Air Basin and incorporates a comprehensive strategy aimed at controlling pollution from all sources. Further discussion of the Air Quality Management Plan can be found in Section IV.B, Air Quality, of this Draft EIR.

*(e) Metro Congestion Management Program*

The Los Angeles County Metropolitan Transportation Authority administers the Congestion Management Program, a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. Adopted by the Metro Board on October 28, 2010, the 2010 Congestion Management Program includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a County-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. The Congestion Management Program guidelines call for evaluation of designated roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour. The guidelines also require evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. Refer to Section IV.K, Traffic, Access, and Parking, of this Draft EIR for further discussion regarding the Congestion Management Program.

## **b. Existing Conditions**

### **(1) Project Site**

As provided in Section II, Project Description, of this Draft EIR, the approximately 32-acre Project Site currently includes the open-air 1,196-seat Amphitheatre with support spaces (i.e., dressing rooms, performer restrooms, green room) below; an 860-square-foot projection booth and control room located above and to the rear of the Amphitheatre seating; an indoor venue located below the Amphitheatre providing approximately 87 seats referred to as [Inside] the Ford; a two-story, approximately 320-square-foot concessions building; a 365-square-foot box office; a plaza referred to as Edison Plaza and a picnic area; surface parking areas; and a former 10,500-square-foot motel building currently used as staff offices for the Ford Theatre Foundation, Los Angeles County Arts Commission, and the Los Angeles Philharmonic.

The Project Site also includes one cell tower and associated structures along the northwest portion of the Project Site and an additional cell tower along the northwestern property boundary. Other facility support spaces, such as storage and maintenance areas and restrooms, are also located throughout the Project Site. The existing buildings on the Project Site comprise a total of approximately 35,811 square feet, while the outdoor plaza

areas comprise approximately 3,580 square feet. Overall, approximately 3.5 acres of the 32-acre Project Site comprises developed area, including the existing structures described above and asphalt-paved surface parking areas. The remaining areas (approximately 28.5 acres) are comprised of undeveloped open space. Landscaping is provided along driveways, surface parking areas, and pedestrian pathways. Additionally, while there are no designated hiking trails within the Project Site, there are existing user-created trails in the hills behind the Amphitheatre and around a cross that is not part of Project Site. These user-created trails are not recognized as official trails.

The topography of the Project Site is widely varied from moderately sloping surface parking areas along the western portion of the Project Site to steep hillsides that are vegetated primarily with chaparral and scattered trees along the northern, southern, and eastern portions of the Project Site. Based on the varying topography of the Project Site, the buildings and structures within the Project Site similarly feature varying heights ranging from approximately 15 feet from adjacent grade (approximately 547 feet above sea level) to approximately 62 feet from adjacent grade (approximately 574 feet above sea level).

The Ford Theatres currently hosts approximately 184 events, including 84 events within the Amphitheatre from May through October and approximately 100 events within the [Inside] the Ford from November through April. Approximately 50,640 people attend events within the Amphitheatre during the May through October event season and approximately 4,000 people attend events within the November through April event season for a total event season attendance of approximately 54,640 people. During the event season, the hours of operation for the Ford Theatres are from 8:00 A.M. to 11:00 P.M., Monday through Sunday. During events, approximately 350 to 380 stacked parking spaces are available within the Project Site. Parking is also available at the Universal City/Studio City Metro Red Line Station where a shuttle is provided to and from the Ford Theatres. The Hollywood Bowl also utilizes the existing parking facilities at the Ford Theatres during non-event days or during low-attendance events at the Ford Theatres.

In September 2013, the County of Los Angeles Chief Executive Office prepared a Notice of Exemption pursuant to CEQA Guidelines, Article 19, Section 15331, Historical Resource Restoration/Rehabilitation (Class 31) for the restoration and rehabilitation of portions of the existing Amphitheatre. These improvements will provide for hillside stabilization, stage reconstruction, disabled access and code compliance improvements, theatrical systems infrastructure improvements, and mechanical and electrical systems upgrades. Of the improvements proposed, the removal of the exterior paint to provide water-resistant surfaces is currently underway.

## (2) Surrounding Area

As shown in the aerial photograph provided in Figure II-X in Section II, Project Description, of this Draft EIR, the area surrounding the Project Site includes a mix of residential uses and open space. The Project Site is specifically bounded by 4-story multi-family residential buildings and open space associated with the Hollywood Reservoir to the north, single- and multi-family residential uses to the east and south, and Cahuenga Boulevard to the west. The uses surrounding the Project Site to the north, east, and south are separated from the developed areas of the Project Site by open space areas and steep intervening ridgelines, with no direct line of sight to or from the developed areas of the Project Site. The Hollywood Bowl, also a County-owned historically significant cultural destination, is located southwest of the Project Site across Cahuenga Boulevard and the Hollywood Freeway.

## 3. Environmental Impacts

### a. Methodology

The analysis of potential land use impacts considers the consistency of the Project with adopted plans, policies, and ordinances that regulate land use on the Project Site. The determination of consistency with relevant land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the Project Site. CEQA Guidelines, Title 14 California Code of Regulations (CEQA Guidelines) Section 15125(d) requires an EIR to discuss inconsistencies with applicable plans and evaluate whether a project is inconsistent with such plans. Projects are considered consistent with General Plan provisions and general SCAG policies if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

### b. Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, Project impacts associated with land use and planning would be significant if the Project would:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or

- Conflict with any applicable habitat conservation plan or natural community conservation plan.

As discussed in the Initial Study prepared for the Project, provided in Appendix A of this Draft EIR, implementation of the Project would not physically divide an established community. Specifically, as described above, the residential uses surrounding the Project Site to the north, east, and south are separated from the developed areas of the Project Site by open space areas and steep intervening ridgelines, with no direct line of sight to or from the developed areas of the Project Site. As illustrated in the conceptual site plans provided in Section II, Project Description, of this Draft EIR, the Project would develop new structures and landscaping that would be primarily concentrated along the northwest and southwest portions of the Project Site, within areas of the Project Site that are primarily developed. As such, with implementation of the Project, the uses surrounding the Project Site to the north, east, and south would continue to be separated from the developed areas of the Project Site by open space areas and steep intervening ridgelines. In addition, the proposed hiking trail would be a continuation of the Project Site's natural, open space areas and, as shown in the conceptual site plans provided in Section II, Project Description, of this Draft EIR, would also be separated from the surrounding uses by intervening open space. Furthermore, all proposed development would occur within the boundaries of the Project Site as it currently exists and would not physically alter surrounding parcels or properties. The Project would also not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. The Project has been designed to contain vehicle and shuttle queuing within the Project Site and expand on-site parking to better accommodate parking demand. As also discussed in the Initial Study, according to the California Department of Fish and Wildlife California Regional Conservation Plans Map, no Habitat Conservation Plans have been developed for any areas within the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. As such, no further analysis of these issues is necessary.

### **c. Project Design Features**

A complete description of the Project and associated development characteristics is provided in Section II, Project Description, of this Draft EIR. No specific project design features beyond the project improvements discussed in Section II, Project Description, of this Draft EIR are proposed with regard to land use.

## d. Analysis of Project Impacts

### (1) Consistency with Local Plans and Applicable Policies

#### *(a) County of Los Angeles General Plan*

General Plan goals and policies that are applicable to the Project and an analysis of the Project's consistency with these policies are provided in Table IV.H-1 on page IV.H-15.

As detailed in Table IV.H-1, the Project would support policies of the County's General Plan, General Goals and Policies Chapter regarding the preservation of open space areas and cultural resources, encouraging cultural and social diversity, and environmental sustainability. Specifically, by rehabilitating the existing Amphitheatre and providing additional performing arts facilities and restaurant and recreational uses, the Project would continue the County's mission to operate the Ford Theatres as a center that fosters the excellence, diversity, vitality, understanding, appreciation and accessibility of the performing arts in Los Angeles County. In addition, as the proposed improvements would be integrated within the topography of the Project Site and grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site, the Project Site would continue to comprise mostly undeveloped open space upon implementation of the Project. Specifically, with Project implementation, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space. Further, the Project is designed to complement the existing historic character of the Ford Theatres and would not involve the removal of any primary character-defining features of the Ford Theatres. Project development would also involve the use of renewable and recyclable construction materials and, with implementation of the Project, on-site recycling would be enhanced.

The Project would also support various policies of the Conservation and Open Space Element by incorporating a variety of sustainability features, including LEED Certification, and maximizing the preservation of the Project Site's existing open space areas, thus maintaining the natural and scenic character of the area. In addition, as the Project Site currently does not have structural BMPs for the filtration and treatment of stormwater runoff, implementation of the BMPs proposed as part of the Project would result in an improvement in surface water quality runoff from the Project Site, thereby preserving water quality. The Project would further coordinate with the County and City Fire Departments and implement recommended guidelines regarding wildland fire prevention. Additionally, the Project would support policies regarding the establishment of recreational opportunities within the County's open space areas by providing a hiking trail within the Project Site.

**Table IV.H-1  
Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<b>General Goals and Policies</b>	
<b>Policy 4:</b> Encourage cultural and social diversity and the preservation of the cultural heritage of Los Angeles County.	<b>Consistent.</b> As described in Section II, Project Description, of this Draft EIR, the mission of the Los Angeles County Arts Commission is to operate the Ford Theatres as a center that fosters the excellence, diversity, vitality, understanding, appreciation and accessibility of the performing arts in Los Angeles County. The Ford Theatre Foundation, in partnership with the Los Angeles County Arts Commission and the Department of Parks and Recreation, supports programs that nurture artists, arts organizations and community, providing a gateway for the people of greater Los Angeles to discover and appreciate cultures of their region and the world.
<b>Policy 9:</b> Direct urban development and revitalization efforts to protect natural and man-made amenities and to avoid severe hazard areas, such as flood prone areas, active fault zones, steep hillsides, landslide areas and fire hazard areas.	<b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings within the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space. The Project would also incorporate measures to address the Project Site's location within a landslide hazard area, liquefaction susceptibility zone, and a fire hazard zone in accordance with existing regulatory requirements.
<b>Policy 10:</b> Protect areas that have significant natural resources and scenic values, including significant ecological areas, the coastal zone and prime agricultural lands.	<b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings within the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.
<b>Policy 11:</b> Protect cultural heritage resources.	<b>Consistent.</b> The Project is designed to complement the existing historic character of the Ford Theatres and to be consistent with the Secretary of the Interior Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. In addition, as discussed in Section IV.E, Cultural Resources, of this Draft EIR, the Project would not involve the removal of any primary character-defining features of the historic Amphitheatre. Further, in the event archaeological and paleontological resources are discovered, work in the area would cease and deposits would be treated in accordance with regulatory requirements.
<b>Policy 13:</b> Conserve the available supply of	<b>Consistent.</b> As discussed in Section IV.G, Hydrology and

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

<b>Goal/Objective/Policy</b>	<b>Analysis of Project Consistency</b>
water and protect water quality.	Water Quality, of this Draft EIR, implementation of the Storm Water Pollution Prevention Plan (SWPPP), Low Impact Development Plan, and associated best management practices (BMPs) would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable during the construction and operation phases of the Project. In addition, as discussed in Section IV.L.1, Utilities and Service Systems—Water, of this Draft EIR, the Project will implement a variety of water conservation features to reduce the Project's water demand.
<b>Policy 14:</b> Restore and protect air quality through the control of industrial and vehicular emissions, improved land use management, energy conservation and transportation planning.	<b>Consistent.</b> As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, development of the Project would implement project design features that would reduce vehicular trips, reduce vehicle miles traveled, and encourage use of alternative modes of transportation, including the continued use of shuttles to and from the Universal City/Studio City Metro Red Line Station. The Project Site is also conveniently located adjacent to a Metro bus stop and a major thoroughfare, Cahuenga Boulevard, and the Hollywood Freeway, thereby reducing vehicle miles traveled and associated vehicular emissions. The Project would also minimize regional air quality impacts from new development by conserving energy through the use of highly efficient electric and HVAC equipment (housed in the proposed central plant) and introducing building design and construction that achieve LEED Certification for the proposed buildings.
<b>Policy 15:</b> Promote more effective recycling and reuse of resources, especially those that are nonrenewable.	<b>Consistent.</b> Project development would involve the use of renewable and recyclable construction materials. In addition, with implementation of the Project, on-site recycling would be enhanced.
<b>Policy 16:</b> Stress the development of community parks particularly in areas of the greatest deficiency, and take advantage of opportunities to preserve large natural and scenic areas.	<b>Consistent.</b> Refer to General Goals and Policies, Policy 9 above.
<b>Policy 29:</b> Encourage the development of ethnic community theme centers that would preserve and enhance cultural diversity.	<b>Consistent.</b> Refer to General Goals and Policies, Policy 4 above.
<b>Policy 37:</b> Promote the preservation and enhancement of landmarks, sites, and areas of cultural, historical, archaeological and urban design significance.	<b>Consistent.</b> Refer to General Goals and Policies, Policy 4 and Policy 11 above.
<b>Policy 38:</b> Protect and enhance the visual uniqueness of natural edges and encourage	<b>Consistent.</b> As discussed above, the Project would preserve the Project Site's natural elements by integrating new



**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
superior design of major entryways.	buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. The Project would also enhance the main entryway to the Ford Theatres by relocating the existing primary Ford Theatres sign along Cahuenga Boulevard East to the main entryway at Cahuenga Boulevard East and Pilgrimage Bridge. Alternatively, a new marquee sign that would be double-sided with LED screens on both sides could be provided along Cahuenga Boulevard East at the main entrance.
<b>Conservation and Open Space Element</b>	
<b>Policy 1:</b> Actively support strict air quality regulations for mobile and stationary sources, and continued research to improve air quality. Promote vanpooling and improved public transportation.	<b>Consistent.</b> The Project would support air quality regulations by reducing emissions to the maximum extent practicable. The Project would also promote the use of alternative modes of transportation.
<b>Policy 2:</b> Support the conservation of energy and encourage the development and utilization of new energy sources including geothermal, thermal waste, solar, wind and ocean-related sources.	<b>Consistent.</b> The Project would incorporate a variety of sustainability features that would reduce energy usage. Such features would include introducing a sustainable building design and construction that achieve LEED Certification for the new buildings. The Project would also incorporate relevant sustainability features set forth in the County's Green Building, Low Impact Development, and Drought-Tolerant Landscaping ordinances.
<b>Policy 4:</b> Protect groundwater recharge and watershed areas, conserve storm and reclaimed water, and promote water conservation programs.	<b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, the soils underlying the Project Site are not conducive to infiltration as they are underlain by bedrock. Notwithstanding, surface water infiltration would be promoted within the Project Site through a variety of BMPs, including the installation of catch basins and planter drains. The Project will also implement a variety of water conservation features to reduce the Project's water demand, including use of high-efficiency toilets, high-efficiency urinals or waterless urinals, and low-flow restroom faucets. In addition, the Project would incorporate drought-tolerant landscaping.
<b>Policy 5:</b> Encourage the maintenance, management and improvement of the quality of imported domestic water, groundwater supplies, natural runoff and ocean water.	<b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater of this Draft EIR, implementation of the SWPPP, Low Impact Development Plan, and associated BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable during the construction and operation phases of the Project. More specifically, implementation of the BMPs would ensure the quality of stormwater runoff leaving the

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
	Project Site would meet all regulatory standards.
<p><b>Policy 13:</b> Encourage open space easements and dedications as a means of meeting scenic, recreational, and conservation needs.</p>	<p><b>Consistent.</b> While the Project would not include an open space easement, the Project would establish a natural, public hiking trail to enhance passive recreational opportunities within the Project Site and experience the natural landscape and views of surrounding iconic landmarks. In addition, the Project has been intentionally designed to minimize building footprints to maximize the preservation of the open space areas of the Project Site, and upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.</p>
<p><b>Policy 16:</b> Substantially retain the integrity and natural grade elevations of significant natural ridgelines and prominent landforms that form the Valley's skyline backdrop.</p>	<p><b>Consistent.</b> Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Ford Theatres. No designated significant ridgelines are identified within the Project Site. Also, upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.</p>
<p><b>Policy 17:</b> Protect cultural heritage resources, including historical, archaeological, paleontological and geological sites, and significant architectural structures.</p>	<p><b>Consistent.</b> Refer to General Goals and Policies, Policy 11 above.</p>
<p><b>Policy 21:</b> Restrict urban development in areas subject to seismic and geologic hazards.</p>	<p><b>Consistent.</b> As discussed in Section IV.F, Geology and Soils, of this Draft EIR, the Project Site does not contain any known active faults and is not within an Alquist-Priolo Earthquake Fault Zone. In addition, the Project would be designed and constructed in accordance with California and Los Angeles County Building Code requirements, as well as the project design features and recommendations set forth in the Geotechnical Report to address other potential geologic hazards within the Project Site including liquefaction and landslides.</p>
<p><b>Policy 22:</b> Restrict urban development in flood prone areas, and thus avoid major new flood control works. Maintain natural watershed processes by regulating development in tributary watersheds. Minimize increased runoff, erosion, and siltation of streambeds that would limit the uses of streams and water bodies for recreation and other beneficial water-related uses.</p>	<p><b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, the Project Site is not within a flood hazard area. Furthermore, in accordance with National Pollutant Discharge Elimination System (NPDES) permit requirements, the Project would have a Low Impact Development Plan in place during the operational life of the Project. The Low Impact Development Plan would include BMPs to promote bioretention or other functions to detain water onsite that would serve to manage post-construction stormwater runoff associated with a 0.75-inch, 24-hour storm event. In addition, the design runoff would be managed so as not to exceed the recommended and allowable runoff flows determined by the Los Angeles County</p>

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
	Department of Public Works.
<p><b>Policy 24:</b> Manage development in hillside areas to protect their natural and scenic character and to reduce risks from fire, flood, mudslides, erosion, and landslides.</p>	<p><b>Consistent.</b> With respect to the protection of the natural and scenic character of the Project Site, see General Goals and Policies, Policy 9 above. With respect to reducing erosion, see Conservation and Open Space Policy 22 above. To reduce risks from fire, a Fuel Modification Plan would be implemented, as detailed in Section IV.J.1, Public Services—Fire Protection. All plantings would be in accordance with the County's Fuel Modification Plan Guidelines. Appropriate Fire Department access would also be provided throughout the Project Site during both construction and operation. Additionally, the Project would comply with the County Fire Department's adopted programs directed at wildland fire prevention. In addition, as described in Section IV.F, Geology and Soils, of this Draft EIR, the Project would include slope reinforcement measures such as the removal of loose slope materials and installation of retaining walls and flexible barriers to manage potential landslides.</p>
<p><b>Policy 27:</b> Provide low intensity outdoor recreation in areas of scenic and ecological value compatible with protection of these natural resources.</p>	<p><b>Consistent.</b> Refer to Conservation and Open Space, Policy 13 above.</p>
<p><b>Policy 30:</b> Develop a system of bikeways, scenic highways, and riding and hiking trails; link recreational facilities where possible.</p>	<p><b>Consistent.</b> Refer to Conservation and Open Space, Policy 13 above.</p>
<b>Land Use Element</b>	
<p><b>Objective 1:</b> To foster compatible land use arrangements that contribute to reduced energy consumption and improved air quality.</p>	<p><b>Consistent.</b> Refer to General Goals and Policies, Policy 14 above.</p>
<p><b>Policy 7:</b> Assure that new development is compatible with the natural and manmade environment by implementing appropriate locational controls and high quality design standards.</p>	<p><b>Consistent.</b> As described in Section II, Project Description, of this Draft EIR, the proposed improvements would be designed to complement the existing historic character of the Ford Theatres and to be consistent with the Secretary of the Interior Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. The Project would be compatible with the massing, size, scale, and architectural features of the Amphitheatre, thereby protecting its historic integrity by avoiding any substantial adverse change in the significance of an historic resource. New buildings would also be integrated with the topography of the Project Site. In addition, a variety of native and drought-tolerant plant material would be used to enhance and complement the existing plant material on the hillside.</p>

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<p><b>Policy 8:</b> Protect the character of residential neighborhoods by preventing the intrusion of incompatible uses that would cause environmental degradation such as excessive noise, noxious fumes, glare, shadowing, and traffic.</p>	<p><b>Consistent.</b> With Project implementation, off-site residential uses would continue to be buffered from proposed on-site development by existing intervening undeveloped open space. As discussed in this Draft EIR, Project operations would have little impact in terms of noise or light spillover onto off-site areas. Similarly, all traffic impacts would be less than significant. For further discussion refer to Section IV.I, Noise; Section IV.B, Air Quality; Section IV.A, Aesthetics, Views, Light, and Glare; and Section IV.K, Traffic, Access and Parking, of this Draft EIR.</p>
<p><b>Policy 14:</b> Establish and implement regulatory controls that ensure compatibility of development adjacent to or within major public open space and recreation areas including National Forests, the National Recreation Area, and State and regional parks.</p>	<p><b>Consistent.</b> Refer to General Goals and Policies, Policy 9 and Land Use Policy 7 above.</p>
<p><b>Policy 20:</b> Establish land use controls that afford effective protection for significant ecological and habitat resources, and lands of major scenic value.</p>	<p><b>Consistent.</b> Refer to General Goals and Policies, Policy 9 above.</p>
<p><b>Policy 24:</b> Promote compatible land use arrangements that reduce reliance on the private automobile in order to minimize related social, economic and environmental costs.</p>	<p><b>Consistent.</b> Refer to General Goals and Policies, Policy 14, above.</p>
<p><b>Policy 25:</b> Promote land use arrangements that will maximize energy conservation.</p>	<p><b>Consistent.</b> Refer to Conservation and Open Space Policy 2 above.</p>
<p><b>Policy 27:</b> Provide a land use mix at the countywide, areawide and community levels based on projected need and supported by evaluation of social, economic and environmental impacts.</p>	<p><b>Consistent.</b> The Project would include a mix of uses within the Project Site, including additional performing arts and rehearsal spaces that would be supported by office and restaurant uses. The Project would also expand recreational opportunities within the Project Site by providing a hiking trail. Implementation of the Project would meet existing critical program needs of the regional arts ecosystem and would provide additional passive recreational opportunities within the region. With the proposed improvements, the County would further support the work of County artists and arts organizations and would expand opportunities for diverse County residents to come together by creating new spaces and programs that better serve the community. In addition, as evaluated throughout this Draft EIR, implementation of the Project would not result in impacts which would be significant and unavoidable.</p>
<p><b>Policy 28:</b> Ensure continuing opportunity for</p>	<p><b>Consistent.</b> As part of the environmental review process, a</p>

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
citizen involvement in the land-use decision making process.	public Scoping Meeting was held regarding the Project on February 18, 2014 in order to solicit public input regarding the Project and its potential impacts. This Draft EIR is being circulated for a 45-day public review and comment period as mandated by CEQA (State CEQA Guidelines Section 15105). During the public review period, written comments concerning the adequacy of the document may be submitted by interested public agencies and members of the public to the County of Los Angeles.
<b>Policy 29:</b> Improve the land use decision-making process by closely monitoring and evaluating the cumulative impacts of individual projects and by modernizing development regulations.	<b>Consistent.</b> The cumulative impacts of the Project combined with 27 related projects, or known development projects that are either proposed, approved, or under construction in the vicinity of the Project Site, are analyzed within each of the environmental impact sections throughout this Draft EIR.
<b>Transportation Element</b>	
<b>Policy 19:</b> Support traffic-operation improvements for improved flow of vehicles.	<b>Consistent.</b> The Project proposes a new signal at the southern driveway that would provide egress from the south parking structure to allow for safer left turns from the driveway to Cahuenga Boulevard East. In addition, to facilitate access and circulation within the proposed Transit Center, the Project includes one new driveway between the northernmost driveway and the main entrance at the intersection of Cahuenga Boulevard East and Pilgrimage Bridge. The northernmost driveway, which is currently used primarily for egress at the end of events, would be reconfigured internally to provide direct access to the proposed maintenance facility and allow egress from the north parking structure. The proposed driveway between the northernmost driveway and the main entrance would provide right-turn only egress from the Transit Center and the parking structure.
<b>Policy 20:</b> Encourage greater use of public transit to special-purpose centers and recreational facilities.	<b>Consistent.</b> With implementation of the Project, use of public transit would be encouraged by continuing to promote parking at the Universal City/Studio City Metro Red Line Station where a shuttle would continue to be provided to and from the Ford Theatres during evening events.
<b>Policy 22:</b> Avoid or minimize the adverse impacts upon people, businesses and communities caused by development of transportation facilities.	<b>Consistent.</b> As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, appropriate project design features would be implemented to reduce traffic impacts to a less than significant level.
<b>Policy 26:</b> Encourage the efficient use and conservation of energy used in transportation.	<b>Consistent.</b> As discussed in Section IV.K, Traffic, Access, and Parking, the Project would include a number of project design features designed to encourage efficiency and conservation, including the provision of information on transportation alternatives in event-related marketing/media

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
	information and managing the use of all parking spaces onsite to maximize parking efficiency and avoid underutilization of parking spaces. In addition, the Project would include an on-site circulation system design that reduces vehicle idling and queuing.
<p><b>Policy 30:</b> Provide transportation facilities that will improve the safety, security and dependability of all transportation modes, provide for seismic safety and be effective in emergency situations.</p>	<p><b>Consistent.</b> Included in the Project are vehicular circulation and queuing improvements, including a Transit Center that would provide on-site queuing for vehicles and shuttles. In addition, at the driveway providing egress from the south parking structure, the Project proposes a new signal to allow for safer left turns from the driveway to Cahuenga Boulevard East. As part of the Project, on-site pedestrian circulation would also be improved by eliminating the pedestrian-vehicular conflicts associated with stacked parking within the existing surface parking areas.</p>
<b>Water and Waste Management Element</b>	
<p><b>Policy 8:</b> Promote solid waste technology, including source reduction, to reduce dependence on sanitary landfills.</p>	<p><b>Consistent.</b> Refer to General Goals and Policies, Policy 15 above.</p>
<p><b>Policy 13:</b> Program water and sewer service extensions to be consistent with General Plan policies and to mitigate situations that pose immediate health and safety hazards.</p>	<p><b>Consistent.</b> The proposed off-site water and sewer line improvements would meet all applicable regulatory requirements set forth by the County and the City.</p>
<p><b>Policy 17:</b> Protect public health and prevent pollution of groundwater through the use of whatever alternative is necessary.</p>	<p><b>Consistent.</b> Refer to Conservation and Open Space Policy 5, above.</p>
<p><b>Policy 18:</b> Provide protection for groundwater recharge areas to ensure water quality and quantity.</p>	<p><b>Consistent.</b> Refer to Conservation and Open Space Policy 4 and Policy 5, above.</p>
<p><b>Policy 19:</b> Avoid or mitigate threats to pollution of the ocean, drainage ways, lakes, and groundwater reserves.</p>	<p><b>Consistent.</b> Refer to Conservation and Open Space Policy 5, above.</p>
<p><b>Policy 22:</b> Design water and waste management systems which enhance the appearance of the neighborhoods in which they are located and minimize negative environmental impacts.</p>	<p><b>Consistent.</b> The proposed off-site utility improvements would be located within existing road rights-of-way where conditions are either developed or disturbed by paved streets and/or existing development. Other than limited aboveground infrastructure such as a booster pump, the utility improvements would involve underground pipelines that would not be visible following installation and repaving of the roadways.</p>
<p><b>Policy 23:</b> Facilitate the recycling of wastes such as metal, glass, paper, and textiles.</p>	<p><b>Consistent.</b> As part of the Project, readily accessible areas around the Project Site for the deposit, storage, and collection of non-hazardous materials for recycling would be provided.</p>

**Table IV.H-1 (Continued)**  
**Project Consistency with the Los Angeles County General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<b>Policy 25:</b> Encourage development and application of water conservation, including recovery and reuse of storm and waste water.	<b>Consistent.</b> See Conservation and Open Space Policy 4, above.
<b>Safety Element</b>	
<b>Policy 17:</b> Continue efforts to reduce all fire hazards, with special emphasis on reducing hazards associated with older buildings, multistory structures, and fire-prone industrial facilities; and maintain an adequate fire prevention capability in all areas.	<b>Consistent.</b> Refer to Conservation and Open Space Policy 24, above.
<b>Policy 18:</b> Expand and improve vegetation management efforts in wildland fire hazard areas.	<b>Consistent.</b> Refer to Conservation and Open Space Policy 24, above.
<b>Policy 19:</b> Promote improved watershed management practices to reduce the risk of damaging runoff and debris movement into urban areas.	<b>Consistent.</b> Refer to Conservation and Open Space Policy 22, above.
<b>Policy 21:</b> Promote the safe transportation of hazardous materials.	<b>Consistent.</b> As discussed in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.
<b>Policy 25:</b> Promote greater public awareness and understanding of safety hazards and emergency preparedness and response procedures.	<b>Consistent.</b> In accordance with regulatory requirements, the Applicant would submit to the County and City Fire Departments, as applicable, an emergency response and/or evacuation plan, as appropriate, for operation of the Project. The emergency response plan could include, but not be limited to, the following: mapping of evacuation routes for vehicles and pedestrians, and the location of the nearest hospital and fire departments.
<b>Policy 26:</b> Promote the development of community/neighborhood and workplace self-help and disaster relief groups to improve the effectiveness of local emergency response, light search and rescue, and emergency medical care.	<b>Consistent.</b> Refer to Safety Policy 25, above.
<i>Source: Los Angeles County General Plan, November 1980; Matrix Environmental, 2014.</i>	

With regards to the Land Use Element, the Project would support compatibility with the existing development of the Project Site and the preservation of surrounding uses and

open space. Specifically, the proposed improvements would be designed to complement the existing historic character of the Ford Theatres and would be compatible with the massing, size, scale, and architectural features of the existing Amphitheatre, thereby protecting its historic integrity. Also, as previously described, new buildings would be integrated within the topography of the Project Site, primarily within already developed areas, thereby maximizing the preservation of the open space areas of the Project Site. In addition, with implementation of the Project, off-site residential uses would continue to be buffered from proposed on-site development by existing intervening undeveloped open space.

The Project would further support policies of the Transportation Element. In particular, the Project would provide a new traffic signal to allow for safer left turns from the southern (egress) driveway to Cahuenga Boulevard East; provide one new driveway between the northernmost driveway and the main entrance to facilitate access and circulation with the proposed Transit Center; and reconfigure the northernmost driveway to provide vehicles with direct access to the proposed maintenance facility and allow egress from the north parking structure, thereby improving the flow of vehicles within and adjacent to the Project Site. The Project would also encourage use of public transit by continuing to promote parking at the Universal City/Studio City Metro Red Line Station where a shuttle would continue to be provided to and from the Ford Theatres during evening events.

Additionally, with the implementation of the sustainability features proposed as part of the Project, including design features to achieve LEED Certification, and the provision of necessary utility improvements, the Project would support applicable policies of the Water and Waste Management Element.

The Project would also support policies of the Safety Element. Specifically, the Project would coordinate with the County and City Fire Departments and implement recommended guidelines regarding wildland fire prevention to reduce fire hazards. In addition, the County would coordinate with the County and City Fire Departments to develop an emergency response and/or evacuation plan, as appropriate. Further, as described in the Geotechnical Report provided in Appendix H of this Draft EIR, the Project would include improvements to prevent potential damage resulting from runoff and debris movement from hillside areas.

Overall, as summarized above and detailed in Table IV.H-1 on page IV.H-15, the Project would be generally consistent with the intent and applicable policies of the County General Plan.



*(b) Los Angeles County Code*

The Los Angeles County Planning and Zoning Code regulates development of unincorporated areas of the County through land use designations and development standards regarding allowable uses, density, height, and design. As the Project Site is not located within an unincorporated area of the County, land use and zoning designations have not been established by the County for the Project Site. However, since the Project Site is owned and operated by the County, the Project would be built in accordance with Los Angeles County Code building design requirements. The Project Site is located within the City of Los Angeles and is zoned per the City of Los Angeles Municipal Code. While not required, a discussion of the City of Los Angeles Municipal Code, as it relates to the Project Site, is provided below.

*(c) City of Los Angeles General Plan*

As previously described, development of the Project Site is governed by the County General Plan and the Los Angeles County Code. Notwithstanding, in accordance with City consultation procedures, a consistency analysis with relevant policies of the City General Plan is provided herein. City General Plan goals and policies that are relevant to the Project and an analysis of the Project's consistency with these policies are provided in Table IV.H-2 on page IV.H-26.

As described in Table IV.H-2, with the creation of a 0.75-mile hiking trail within the Project Site, the Project would support policies of the General Plan Framework Land Use Chapter regarding the establishment of new open space opportunities to serve the needs of existing and future residents. In addition, as off-site residential uses would continue to be buffered from proposed on-site development by existing intervening undeveloped open space, the Project would be consistent with the goals, objectives, and policies of the General Plan Framework's Land Use Chapter regarding preservation of and compatibility with the scale and character of the City's residential neighborhoods. The Project would further promote and enhance pedestrian activity through the creation of 45,000 square feet of plaza areas that could be used as picnic and community space.

The Project would also be consistent with the relevant objectives and policies of the General Plan Framework's Urban Form and Neighborhood Design Chapter. Specifically, the Project would contribute to the development and improvement of community facilities by providing new and enhanced performing arts facilities and a hiking trail, which would serve to meet the performing arts and recreational needs at a City- and County-wide level. The Project would also incorporate various elements to promote individual and community safety including coordinating with the County of Los Angeles Sheriff's Department and the Los Angeles Police Department, as appropriate, regarding crime prevention features to be

**Table IV.H-2  
Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<b>General Plan Framework</b>	
<b>Land Use Chapter</b>	
<p><b>Policy 3.1.3:</b> Identify areas for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.</p>	<p><b>Consistent.</b> The Project would establish a natural, public hiking trail to enhance passive recreational opportunities within the Project Site and create an opportunity to experience the natural landscape and views of surrounding iconic landmarks. In addition, the Project has been intentionally designed to minimize building footprints to maximize the preservation of the open space areas of the Project Site, and upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.</p>
<p><b>Objective 3.3:</b> Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</p>	<p><b>Consistent.</b> The Project Site is located in an urbanized portion of the City on a site that is currently developed. As such, the Project would be served by the existing utility and transportation infrastructure currently serving the on-site uses, with upgrades and extensions as necessary. In addition, the Project would be served by existing fire and police stations.</p>
<p><b>Goal 3B:</b> Preservation of the City's stable single-family residential neighborhoods.</p> <p><b>Objective 3.5:</b> Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.</p>	<p><b>Consistent.</b> With Project implementation, off-site residential uses would continue to be buffered from proposed on-site development by existing intervening undeveloped open space.</p>
<p><b>Goal 3L:</b> Districts that promote pedestrian activity and provide a quality experience for the City's residents.</p> <p><b>Objective 3.16:</b> Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.</p>	<p><b>Consistent.</b> Within the Ford Plaza, the Project would provide a plaza deck that would serve as the primary gathering space for the Ford Theatres. The plaza deck would create approximately 45,000 square feet of outdoor plaza areas that would be used as picnic and community space and provide visitors with views of the surrounding hillsides. In addition, landscaping proposed along Cahuenga Boulevard East would berm up to cover the exposed areas of the parking structure, thereby bringing the park-like setting of the Ford Theatres to the Cahuenga Boulevard East street edge. The various components of the Project would also be connected via pedestrian walkways throughout the Project Site.</p>
<b>Urban Form and Neighborhood Design Chapter</b>	
<p><b>Objective 5.4:</b> Encourage the development of community facilities and improvements that are based on need within the centers and reinforce or define those centers and the neighborhoods they</p>	<p><b>Consistent.</b> The Project would contribute to the development and improvement of community facilities through the development of new performing arts facilities and a hiking trail that would serve to meet</p>

**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
serve.	performing arts and recreational needs on a City- and County-wide basis.
<p><b>Policy 5.8.4:</b> Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.</p>	<p><b>Consistent.</b> Project signage would include various identity signs including a central identity sign. The identity signs may include the existing Ford Theatres sign along Cahuenga Boulevard East, which would be relocated to the main entrance at Cahuenga Boulevard East and Pilgrimage Bridge. Alternatively, a new marquee sign that would be double-sided with LED screens on both sides could be provided along Cahuenga Boulevard East at the main entrance. The Project would also include internally illuminated graphic signs along the façades of the new theatre, the north parking structure, and the restaurant. In addition, a large sign identifying the Ford Theatres would be placed along the proposed sound wall. This sign is anticipated to be illuminated. Monitors that would be used for a variety of purposes such as publicizing events, promoting the available food services, assisting in wayfinding, and for broadcasting sold-out events may also be provided in the plaza areas and other public spaces throughout the Project Site. The Project would also include interpretive signage along the proposed hiking trail and throughout the Project Site to provide information about the history of the Ford Theatres, Ford programs and local flora and fauna. Wayfinding signs would also be located throughout the Project Site, including at parking structure entrances and elevators. As such, the signage proposed would be designed to be integrated with the architecture of the buildings and would be compatible with the character of the surrounding uses.</p>
<p><b>Objective 5.9:</b> Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.</p> <p><b>Policy 5.9.1:</b> Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.</p>	<p><b>Consistent.</b> Per consultation with the County of Los Angeles Sheriff's Department and Los Angeles Police Department, the Project would incorporate various elements to promote individual and community safety as set forth in the project design features included in Section IV.J.2, Public Services—Police Protection, of this Draft EIR. Such features could include surveillance cameras, adequate lighting within parking areas, and signage.</p>
<b>Open Space and Conservation Chapter</b>	
<p><b>Objective 6.1:</b> Protect the City's natural settings from the encroachment of urban development,</p>	<p><b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings with</p>

**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<p>allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.</p>	<p>the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.</p>
<p><b>Objective 6.2:</b> Maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.</p>	<p><b>Consistent.</b> Refer to General Plan Framework Policy 3.1.3 above.</p>
<p><b>Objective 6.3:</b> Ensure that open space is managed to minimize environmental risks to the public.</p>	<p><b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, the Project Site is not within a flood hazard area. In addition, as described in Section IV.F, Geology and Soils, of this Draft EIR, the Project would be designed and constructed in accordance with California and Los Angeles County Building Code requirements, as well as the project design features and recommendations set forth in the Geotechnical Report to address potential geologic hazards within the Project Site including liquefaction and landslides. Further, to reduce risks from fire, a Fuel Modification Plan would be implemented, as detailed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR. Appropriate Fire Department access would also be provided throughout the Project site during both construction and operation. Additionally, the Project would comply with the County Fire Department's adopted programs directed at wildland fire prevention.</p>
<p><b>Policy 6.3.1:</b> Preserve flood plains, landslide areas, and steep terrain areas as open space, wherever possible, to minimize the risk to public safety.</p>	<p><b>Consistent.</b> As discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project Site is not within a flood hazard area. In addition, the majority of the open space areas designated within a landslide hazard area would remain as open space with implementation of the Project.</p>
<p><b>Policy 6.4.1:</b> Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the City.</p>	<p><b>Consistent.</b> Refer to General Plan Framework Policy 3.1.3 above.</p>
<p><b>Policy 6.4.8:</b> Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.</p>	<p><b>Consistent.</b> Refer to General Plan Framework Policy 3.1.3 above.</p>

**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<p>b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.</p>	
<p><b>Infrastructure and Public Services Chapter</b></p>	
<p><b>Policy 9.3.1:</b> Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.</p>	<p><b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, implementation of the SWPPP, Low Impact Development Plan, and associated BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable during the construction and operation phases of the Project. In addition, in accordance with County NPDES permit requirements, the Project would be required to have a Low Impact Development Plan in place during the operational life of the Project. The Low Impact Development Plan would include BMPs to promote bioretention or other functions to detain water onsite that would serve to manage post-construction stormwater runoff associated with a 0.75-inch, 24-hour storm event. In addition, the design runoff would be managed so as not to exceed the recommended and allowable runoff flows determined by the Los Angeles County Department of Public Works.</p>
<p><b>Goal 9B:</b> A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.</p>	<p><b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, the Project Site is not within a flood hazard area. As previously described, implementation of the SWPPP, Low Impact Development Plan, and associated BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff to the maximum extent practicable during the construction and operation phases of the Project.</p>
<p><b>Objective 9.6:</b> Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p><b>Consistent.</b> Refer to General Plan Framework Policy 9.3.1, above.</p>
<p><b>Policy 9.9.8:</b> Design projects located in hillside areas so as to maintain the City's ability to suppress wildfires.</p>	<p><b>Consistent.</b> To reduce risks from fire, a Fuel Modification Plan would be implemented, as detailed in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR. All plantings would be in accordance with the County's Fuel Modification Plan Guidelines. Appropriate Fire Department access would also be provided throughout the Project Site during both construction and</p>

**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
	operation. Additionally, the Project would comply with the County Fire Department's adopted programs directed at wildland fire prevention.
<p><b>GOAL 9P:</b> Appropriate lighting required to (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building facade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.</p>	<p><b>Consistent.</b> The Project would feature illuminated building façades on the north parking structure, the new theatre, the restaurant, and the proposed sound wall. In addition, the Project would include exterior lighting along vehicular and pedestrian pathways and at the upper level of the north parking structure for security and wayfinding purposes. Accent lighting to highlight architectural features, landscape elements, and the Project's signage would also be incorporated. The Project would also include lighting throughout the plaza areas. Further, the Project would include new theatrical lighting within the Amphitheatre. As discussed in Section IV.A, Aesthetics, Views, Light, and Glare, of this Draft EIR, in accordance with Project Design Feature A-3 included therein, Project lighting, where applicable, would incorporate shielding and aiming to prevent glare and light spill and the upward emission of light and Project lighting would not exceed 2 foot-candles outside of the Project Site boundary. In addition, there are no residential properties or other sensitive uses immediately surrounding the Project Site, and any light emanating from the proposed Project lighting would likely be contained within the Project Site. Also, lighting associated with the proposed theatrical lighting would be consistent with the existing lighting within the Amphitheatre.</p>
<b>Hollywood Community Plan</b>	
<p><b>Objective 7:</b> To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural, character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.</p>	<p><b>Consistent.</b> Refer to General Plan Framework Objective 6.1 above.</p>
<b>Recreation and Parks</b>	
<p><b>Policy 3:</b> That existing recreational sites and facilities be upgraded through site improvements, rehabilitation and reuse of sound structures, and replacement of obsolete structures, as funds become available.</p>	<p><b>Consistent.</b> As described in Section II, Project Description, of this Draft EIR, the Project would involve the rehabilitation of portions of the existing Amphitheatre and the development of new facilities and outdoor plaza areas to enhance the existing Ford Theatres.</p>
<b>Conservation Element</b>	
<p>Protect important cultural and historical sites and resources for historical, cultural, research, and</p>	<p><b>Consistent.</b> The Project is designed to complement the existing historic character of the Ford Theatres and to</p>

**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
community educational purposes.	be consistent with the Secretary of the Interior Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. In addition, as discussed in Section IV.E, Cultural Resources, of this Draft EIR, the Project would not involve the removal of any primary character-defining features of the Ford Theatres. Further, in the event archaeological and paleontological resources are discovered, work in the area would cease and deposits would be treated in accordance with regulatory requirements.
Protect and promote the restoration, to the greatest extent practical, of sensitive plant and animal species and their habitats.	<b>Consistent.</b> As discussed in Section IV.D, Biological Resources, of this Draft EIR, a variety of sensitive plant and wildlife species were observed within the Project Site. With implementation of mitigation measures promoting the protection of these species within the Project Site, potential impacts to onsite sensitive plant and wildlife species would be less than significant.
Continue to identify significant habitat areas, corridors and buffers and to take measures to protect, enhance and/or restore them.  Continue to protect, restore and/or enhance habitat areas, linkages and corridor segments, to the greatest extent practical, within city owned or managed sites.	<b>Consistent.</b> As described in Section IV.D, Biological Resources, of this Draft EIR, there are no regional wildlife movement corridors within or near the Project Site. In addition, the Project Site is not within a designated regional wildlife linkage area. Notwithstanding, Project development would occur primarily within the already developed portions of the Project Site and, upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space. In addition, the proposed trail alignment would utilize some existing user-created informal trails to minimize disturbance of the natural hillsides.
Protect important natural habitats and scenic sites outside the city which are owned by the city or are impacted by city facilities.	<b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.
Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	<b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres

**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
	of the 32-acre Project Site would comprise undeveloped open space.
<b>Open Space Element</b>	
To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public.	<b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Further, as discussed in Section IV.E, Cultural Resources, of this Draft EIR, the Project would not involve the removal of any primary character-defining features of the Ford Theatres. The Project would also be compatible with the massing, size, scale, and architectural features of the Amphitheatre, thereby protecting its historic integrity by avoiding any substantial adverse change in the significance of an historic resource.
To provide access, where appropriate, to open space lands.	<b>Consistent.</b> As part of the Project, an approximately 0.75-mile hiking trail would be provided with trail terminations at the north and south parking structures within the Transit Center and the Ford Plaza, respectively. The hours of operation for use of the trail would observe standard park hours of sunrise to sunset. In addition, within the Ford Plaza, the Project would provide a plaza deck that would serve as the primary gathering space for the Ford Theatres. The plaza deck would create approximately 45,000 square feet of outdoor plaza areas that would be used as picnic and community space and provide visitors with views of the surrounding hillsides.
To emphasize the importance of, and to preserve open space and natural features in private and public development.	<b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space.
Alteration of drainage patterns shall be minimized in the development of any land in mountain areas.	<b>Consistent.</b> As discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, since Project development would primarily occur within the areas of the Project Site already disturbed, the Project would not alter drainage patterns within the open space areas of the Project Site.
Cultural and historical monuments located on	<b>Consistent.</b> As discussed in Section IV.E, Cultural



**Table IV.H-2 (Continued)**  
**Project Consistency with the City of Los Angeles General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
open space lands shall be preserved.	Resources, of this Draft EIR, the Project would not involve the removal of any primary character-defining features of the Amphitheatre. The Project would also be compatible with the massing, size, scale, and architectural features of the Amphitheatre, thereby protecting its historic integrity by avoiding any substantial adverse change in the significance of an historic resource.
<p>Source: <i>City of Los Angeles General Plan; Matrix Environmental, 2014.</i></p>	

incorporated into the design of the Project such as providing proper lighting within the parking structures to reduce areas of concealment and lighting of building entries and pedestrian walkways to provide for pedestrian orientation.

Additionally, the Project would be consistent with the goals, objectives, and policies of the General Plan Framework's Open Space and Conservation Chapter, which guides the provision, management, and conservation of the City's public open space resources. In particular, with Project implementation, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space. In addition, the Project has been designed to maximize the preservation of the Project Site's natural elements by integrating new buildings within the topography of the Project. Further, as detailed in Section IV.F, Geology and Soils and Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, the Project would include various project design features to reduce potential hazards associated with the Project Site's location, thereby supporting the objective to manage open space to minimize environmental risks to the public.

The Project would also be generally consistent with the relevant goals, objectives, and policies of the General Plan Framework's Infrastructure and Public Services Chapter, which calls for monitoring service demands and forecasting the future need for infrastructure improvements, maintaining an adequate system/service to support the needs of population and employment, and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. As discussed in Section IV.L, Utilities and Service Systems, of this Draft EIR, there would be adequate supplies and infrastructure capacity to serve the water and energy demands of the Project. In addition, as discussed in Section IV.J, Public Services, of this Draft EIR, fire and police protection services and facilities would be able to adequately serve the Project's demand for these services. Further, with the implementation of BMPs such as installation of catch basins

and planter drains throughout the Project Site to collect roof and site runoff, the Project would support the objective to pursue effective and efficient approaches to reducing stormwater runoff and protect water quality.

As previously discussed, the Hollywood Community Plan and Hollywood Community Plan Update designates the Project Site for Public Facilities. Continued use of the Project Site as a public regional park and performing arts center would be consistent with this land use designation. The Project would also be consistent with the general intent of the Hollywood Community Plan and Hollywood Community Plan Update to preserve open space and enhance existing recreational sites. Specifically, as previously described, the Project would preserve the Project Site's natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site and, upon implementation of the Project, the Project Site would comprise mostly undeveloped open space. Further, the Project would involve the rehabilitation of portions of the existing Amphitheatre and the development of new performing arts and recreational facilities and outdoor plaza areas to enhance the existing Ford Theatres.

Lastly, with the preservation of the existing historic character of the Ford Theatres as well as the Project Site's natural elements and undeveloped open space areas, the Project would support the goals, objectives, and policies of the City General Plan Conservation and Open Space Elements to protect cultural and historical sites and scenic areas.

In summary, the Project would be generally consistent with relevant policies of the City General Plan.

*(d) Los Angeles Municipal Code*

As previously noted, since the Project Site is owned and operated by the County, the Project would be built in accordance with Los Angeles County Code building design requirements and compliance with City land use and zoning designations would not be required. Notwithstanding, with implementation of the Project, the Project Site would continue to be used as a public regional park and performing arts center. As such, the Project would be consistent with the zoning of the Project Site for Public Facilities. In addition, while some of the proposed buildings and structures would exceed 30 feet in height, the Project has been intentionally designed to be compatible with the massing, size, and scale of the existing structures.

## (2) Consistency with Regional Plans

### *(a) SCAG Regional Transportation Plan/Sustainable Communities Strategy and Growth Vision Report*

A detailed discussion of the Project's consistency with the applicable goals of SCAG's 2012–2035 RTP/SCS and Growth Vision Report is provided in Table IV.H-3 on page IV.H-36.

As described in Table IV.H-3, the Project would concentrate new development and employment opportunities near the Hollywood Freeway and the Cahuenga Pass transportation corridor, thereby minimizing vehicle trips and vehicle miles traveled. In addition, use of shuttles to transport patrons to and from the Universal City/Studio City Metro Red Line Station and the Ford Theatres during evening events would continue with implementation of the Project. The Project would also incorporate features to support and promote environmental sustainability by including design elements such as drought-tolerant landscapes, best management practices for water management on-site, high efficiency utilities and infrastructure, and continued and enhanced solid waste management policies.

The Project would also be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. Therefore, as demonstrated in Table IV.H-3, the Project would be generally consistent with SCAG's 2012–2035 RTP/SCS.

As provided in Table IV.H-3, the four principles within the Growth Vision Report are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. As detailed in Table IV.H-3, the Project would focus development in an urbanized city within an established roadway network, adjacent to the Hollywood Freeway and the Cahuenga Pass. Furthermore, the Project would support and enhance the continued operation of the Ford Theatres as a center that fosters the excellence, diversity, vitality, understanding, appreciation and accessibility of the performing arts in Los Angeles County. In addition, with operation of the Ford Theatres, the Ford Theatre Foundation, in partnership with the Los Angeles County Arts Commission and the Department of Parks and Recreation, supports programs that nurture artists, arts organizations and community, providing a gateway for the people of greater Los Angeles to discover and appreciate cultures of their region and the world. As described above, the Project would also incorporate features to support and promote environmental sustainability. Therefore, as demonstrated in Table IV.H-3, the Project would be generally consistent with SCAG's Growth Vision Report.

**Table IV.H-3  
Project Consistency with Applicable Goals of the Southern California Association of Governments'  
Regional Transportation Plan/Sustainable Communities Strategy and Compass Growth Vision**

Goals and Principles	Project Consistency
<b><i>Regional Transportation Plan/Sustainable Communities Strategy Goals</i></b>	
Maximize mobility and accessibility for all people and goods in the region.	<b>Consistent.</b> The Project would enhance existing and provide new performing arts facilities and restaurant and recreational uses with convenient regional access via the Cahuenga Pass and the Hollywood Freeway. In addition, use of shuttles to transport patrons to and from the Universal City/Studio City Metro Red Line Station and the Ford Theatres during evening events would continue with implementation of the Project. Further, the Project would include circulation improvements to facilitate mobility and access within the Project Site.
Ensure travel safety and reliability for all people and goods in the region.	<b>Consistent.</b> The Project does not include any hazardous design features that could pose safety issues to travelers.
Preserve and ensure a sustainable regional transportation system.	<b>Consistent.</b> As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, Project impacts related to the Los Angeles County Congestion Management Plan, which serves as the monitoring and analytical basis for regional transportation funding decisions, would be less than significant.
Maximize the productivity of our transportation system.	<b>Consistent.</b> The Project would enhance existing and provide new performing arts facilities and restaurant and recreational uses adjacent to the Cahuenga Pass and the Hollywood Freeway. In addition, use of shuttles to transport patrons to and from the Universal City/Studio City Metro Red Line Station and the Ford Theatres during evening events would continue with implementation of the Project, thus facilitating access and mobility and improving the productivity of the transportation system.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	<b>Consistent.</b> The Project would combine proposed performing arts facilities and restaurant and recreational uses with existing performing arts facilities, which would serve to reduce vehicle trips and vehicle miles travelled, thus contributing to a reduction in air pollutant emissions. The Project would also incorporate a variety of sustainability features that would reduce energy and water usage such as drought-tolerant landscapes, best management practices for water management on-site, and high efficiency utilities and infrastructure.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	<b>Consistent.</b> The Project would enhance existing and provide new performing arts facilities and restaurant and recreational uses within the existing Ford Theatres, thereby concentrating a variety of uses within one site. In addition, use of shuttles to transport patrons to and

**Table IV.H-3 (Continued)**  
**Project Consistency with Applicable Goals of the Southern California Association of Governments’**  
**Regional Transportation Plan/Sustainable Communities Strategy and Compass Growth Vision**

Goals and Principles	Project Consistency
	from the Universal City/Studio City Metro Red Line Station and the Ford Theatres during evening events would continue with implementation of the Project, thus encouraging use of transit.
<b>Compass Growth Vision Principles</b>	
<b>Principle 1: Improve mobility for all residents</b>	
Encourage transportation investments and land use decisions that are mutually supportive. Encourage transit-oriented development. Promote a variety of travel choices.	<b>Consistent.</b> The Project would enhance existing and provide new performing arts facilities and restaurant and recreational uses within the existing Ford Theatres, thereby concentrating a variety of uses within one site and in close proximity to regional access via the Cahuenga Pass and the Hollywood Freeway. In addition, use of shuttles to transport patrons to and from the Universal City/Studio City Metro Red Line Station and the Ford Theatres during evening events would continue with implementation of the Project, thus encouraging use of transit.
Locate new housing near existing jobs and new jobs near existing housing.	<b>Consistent.</b> Implementation of the Project would make available additional employment opportunities. Such opportunities would be provided within an existing urbanized area that contains a mix of uses including housing.
<b>Principle 2: Foster livability in all communities</b>	
Promote infill development and redevelopment to revitalize existing communities.	<b>Consistent.</b> The Project includes development of new performing arts facilities and restaurant and recreational uses within the existing Ford Theatres. These improvements would enhance existing facilities and provide for new artistic programming opportunities that together would activate the Project Site and transform the existing Ford Theatres from a single-use performing arts facility open primarily on weekends to a multi-use cultural and recreational center open daily for a wide variety of users.
Promote developments that provide a mix of uses.	<b>Consistent.</b> The Project would enhance existing and provide new performing arts facilities and restaurant and recreational uses within the existing Ford Theatres, thereby concentrating a variety of uses within one site
Promote “people scaled,” pedestrian-friendly (walkable) communities.	<b>Consistent.</b> With Project implementation, on-site pedestrian activity would be improved by providing a plaza deck that would serve as the primary gathering space for the Ford Theatres. The plaza deck would create approximately 45,000 square feet of outdoor plaza areas that would be used as picnic and community space and provide visitors with views of the surrounding hillsides. On-

**Table IV.H-3 (Continued)**  
**Project Consistency with Applicable Goals of the Southern California Association of Governments'**  
**Regional Transportation Plan/Sustainable Communities Strategy and Compass Growth Vision**

Goals and Principles	Project Consistency
	site pedestrian activity would be further improved by enhancing existing parking operations with two new parking structures that would include pedestrian walkways to and from the parking structures and the various components of the Project. In addition, the Project would include a designated area for shuttles.
Support the preservation of stable, single-family neighborhoods.	<b>Consistent.</b> With Project implementation, off-site residential uses would continue to be buffered from proposed on-site development by existing intervening undeveloped open space.
<b>Principle 3: Enable prosperity for all people</b>	
Support educational opportunities that promote balanced growth.	<b>Consistent.</b> The Project would support and enhance the continued operation of the Ford Theatres as a center that fosters the excellence, diversity, vitality, understanding, appreciation and accessibility of the performing arts in Los Angeles County. In addition, with operation of the Ford Theatres, the Ford Theatre Foundation, in partnership with the Los Angeles County Arts Commission and the Department of Parks and Recreation, supports programs that nurture artists, arts organizations and community, providing a gateway for the people of greater Los Angeles to discover and appreciate cultures of their region and the world.
Ensure environmental justice regardless of race, ethnicity or income class.	<b>Consistent.</b> No aspect of Project development would result in a disproportionate impact to populations that are related to environmental justice issues.
Encourage civic engagement.	<b>Consistent.</b> The County's commitment to civic engagement is embedded in its mission to operate the Ford Theatres as a center that fosters the excellence, diversity, vitality, understanding, appreciation and accessibility of the performing arts in Los Angeles County. In addition, with operation of the Ford Theatres, the Ford Theatre Foundation, in partnership with the Los Angeles County Arts Commission and the Department of Parks and Recreation, supports programs that nurture artists, arts organizations and community, providing a gateway for the people of greater Los Angeles to discover and appreciate cultures of their region and the world. The Project would further the Ford Theatres' mission by providing new performing arts facilities that would be available to diverse communities throughout the region.

**Table IV.H-3 (Continued)**  
**Project Consistency with Applicable Goals of the Southern California Association of Governments’**  
**Regional Transportation Plan/Sustainable Communities Strategy and Compass Growth Vision**

Goals and Principles	Project Consistency
<b><i>Principle 4: Promote sustainability for future generations</i></b>	
Preserve rural, agricultural, recreational and environmentally sensitive areas.	<b>Consistent.</b> The Project would preserve the Project Site’s natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space. In addition, as part of the Project, an approximately 0.75-mile hiking trail would be provided with trail terminations at the north and south parking structures within the Transit Center and the Ford Plaza, respectively.
Focus development in urban centers and existing cities.	<b>Consistent.</b> The Project would focus development in an urbanized city.
Develop strategies to accommodate growth that uses resources efficiently, eliminates pollution and significantly reduces waste.  Utilize “green” development techniques.	<b>Consistent.</b> The Project would incorporate features to support and promote environmental sustainability. Specifically, the new buildings and infrastructure would be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the County’s Green Building Ordinance. The Project would feature sustainable design elements such as drought-tolerant landscapes, best management practices for water management on-site, high efficiency utilities and infrastructure, and continued and enhanced solid waste management policies.
<p><i>Source: Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy and Growth Vision Report; Matrix Environmental, 2014.</i></p>	

***(b) Regional Comprehensive Plan***

A detailed discussion of the Project’s consistency with the applicable goals of the Regional Comprehensive Plan is provided in Table IV.H-4 on page IV.H-40. As shown therein, the Project would be generally consistent with and would help to support the applicable goals and policies of the Regional Comprehensive Plan. In particular, the Project would promote goals of the Regional Comprehensive Plan by providing a mix of uses within one site conveniently situated adjacent to the Cahuenga Pass and the Hollywood Freeway. In addition, the Project would enhance pedestrian accessibility

**Table IV.H-4  
Project Consistency with the Southern California Association of Governments'  
Regional Comprehensive Plan**

Goals and Policies	Project Consistency
<b>Land Use and Housing</b>	
<p><b>Goal:</b> Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy.<sup>9</sup></p> <ul style="list-style-type: none"> <li>• Focusing growth in existing and emerging centers and along major transportation corridors.</li> <li>• Creating significant areas of mixed-use development and walkable, “people-scaled” communities.</li> <li>• Providing new housing opportunities, with building types and locations that respond to the region’s changing demographics.</li> <li>• Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations.</li> <li>• Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots.</li> <li>• Preserving existing, stable, single-family neighborhoods.</li> <li>• Protecting important open space, environmentally sensitive areas and agricultural lands from development.</li> </ul>	<p><b>Consistent.</b> The Project would enhance existing and provide new performing arts facilities and restaurant and recreational uses within the existing Ford Theatres, thereby providing a mix of uses within one site conveniently situated adjacent to the Cahuenga Pass and the Hollywood Freeway. In addition, use of shuttles to transport patrons to and from the Universal City/Studio City Metro Red Line Station and the Ford Theatres during evening events would continue with implementation of the Project. Further, the Project is designed to enhance pedestrian accessibility throughout the Project Site by creating approximately 45,000 square feet of outdoor plaza areas that would be used as picnic and community space and provide visitors with views of the surrounding hillsides. On-site pedestrian activity would be further improved by enhancing existing parking operations with two new parking structures that would include pedestrian walkways to and from the parking structures and the various components of the Project. The Project would also support the preservation of open space and the existing residential uses by maintaining the undeveloped hillsides, which buffer the surrounding residential uses from the developed areas of the Project Site.</p>
<p><b>Policy LU-6.2:</b> Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.</p>	<p><b>Consistent.</b> The Project would incorporate features to support and promote environmental sustainability. Specifically, the new buildings and infrastructure would be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the County’s Green Building Ordinance. The Project would feature sustainable design elements such as drought-tolerant landscapes, best management practices for water management on-site, high efficiency</p>

<sup>9</sup> SCAG’s 2004 Growth Vision Report identified 2% Strategy Opportunity Areas, which represented areas of the region that were targeted for growth, where projects, plans, and policies consistent with the Compass Blueprint principles would best serve the goals of the Growth Vision. According to SCAG staff, the 2% Strategy Opportunity Areas were superseded by the High-Quality Transit Areas identified in the 2012–2035 RTP/SCS. (Source: telephone communication with Ping Chang, Program Manager at SCAG, September 17, 2013.) The Project Site is not located within a designated High-Quality Transit Area.



**Table IV.H-4 (Continued)**  
**Project Consistency with the Southern California Association of Governments'**  
**Regional Comprehensive Plan**

Goals and Policies	Project Consistency
	utilities and infrastructure, and continued and enhanced solid waste management policies.
<b>Open Space and Habitat</b>	
<p><b>Goal:</b> Enhance the region's parks, trails and community open space infrastructure to support the aesthetic, recreational and quality-of-life needs, providing the highest level of service to our growing region by:</p> <ul style="list-style-type: none"> <li>• Creating new community open space that is interconnected, accessible, equitably distributed, provides public health benefits, and meets the changing and diverse needs of communities;</li> <li>• Improving existing community open space through urban forestry and other programs that provide environmental benefits.</li> </ul>	<p><b>Consistent.</b> The Project would preserve the Project Site's natural elements by integrating new buildings with the topography of the Project Site. In addition, Project grading would be designed to retain the integrity and natural grade elevations of the landforms that influence the visual quality of the Project Site. Upon implementation of the Project, approximately 27.7 acres of the 32-acre Project Site would comprise undeveloped open space. In addition, as part of the Project, an approximately 0.75-mile hiking trail would be provided. The proposed trail would observe standard park hours of sunrise to sunset.</p>
<p><b>Policy OSC-10:</b> Developers and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p><b>Consistent.</b> The Project represents both infill development and redevelopment. The Project includes rehabilitation of the Amphitheatre and the development of new performing arts, restaurant, and recreational uses within the existing Project Site. The proposed improvements would provide additional performing arts and recreational opportunities to the local community and the region.</p>
<p><b>Policy OSC-11:</b> Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.</p>	<p><b>Consistent.</b> The new buildings and infrastructure would be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the County's Green Building Ordinance. New construction would feature sustainable design elements such as drought-tolerant landscapes, best management practices for water management on-site, and high efficiency utilities and infrastructures. Construction of the Project would utilize recyclable materials to the extent feasible and, with implementation of the Project, on-site recycling would also be enhanced.</p>
<p><b>Policy OSC-12:</b> Developers and local governments should promote water-efficient land use and development.</p>	<p><b>Consistent.</b> The Project would implement a variety of water conservation features including, but not limited to, the use of high efficiency irrigation systems, centralized and weather-responsive irrigation controls, water efficient landscaping, and high efficiency plumbing fixtures.</p>

**Table IV.H-4 (Continued)**  
**Project Consistency with the Southern California Association of Governments'**  
**Regional Comprehensive Plan**

Goals and Policies	Project Consistency
<b>Water</b>	
<p><b>Policy WA-11:</b> Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.</p>	<p><b>Consistent.</b> As discussed in Section IV.L.1, Utilities and Service Systems—Water, of this Draft EIR, in consultation with the City of Los Angeles Department of Water and Power, it was determined that the existing water infrastructure would not be able to accommodate the Project. As such, as part of the Project, two new connections would be provided to the high pressure water main in Cahuenga Boulevard East.</p>
<p><b>Policy WA-12:</b> Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</p>	<p><b>Consistent.</b> The Project would implement a variety of water conservation features including, but not limited to, the use of high efficiency irrigation systems, centralized and weather-responsive irrigation controls, water efficient landscaping, and high efficiency plumbing fixtures.</p>
<p><b>Policy WA-27:</b> Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.</p>	<p><b>Consistent.</b> The Project has been designed to minimize building footprints and maximize the preservation of the open space areas of the Project Site. Accordingly, the Project would result in a minimal increase in impervious surfaces (from 11 percent to 13 percent). In addition, as discussed in Section IV.G, Hydrology, Water Quality, and Groundwater, of this Draft EIR, the Project would implement BMPs to promote bioretention through the use of catch basins and planter drains to detain water onsite.</p>
<p><b>Policy WA-32:</b> Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.</p>	<p><b>Consistent.</b> The Project would implement a variety of water conservation features including, but not limited to, the use of high efficiency irrigation systems, centralized and weather-responsive irrigation controls, water efficient landscaping, and high efficiency plumbing fixtures.</p>
<b>Energy</b>	
<p><b>Policy EN-8:</b> Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> <li>• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure.</li> <li>• Land use and planning strategies to increase</li> </ul>	<p><b>Consistent.</b> The Project would concentrate new development and employment opportunities with convenient regional access via the Cahuenga Pass and the Hollywood Freeway. In addition, with implementation of the Project, use of transit would be encouraged through the continued operation of shuttles to and from the Universal City/Studio City Metro Red Line Station. Further, the Project would use existing utility infrastructure maintained by the Los Angeles Department of Water and Power, the Southern California Gas Company, and the Los Angeles Department of Public Works.</p>

**Table IV.H-4 (Continued)**  
**Project Consistency with the Southern California Association of Governments'**  
**Regional Comprehensive Plan**

Goals and Policies	Project Consistency
biking and walking trips.	
<p><b>Policy EN-10:</b> Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Using energy efficient materials in building design, construction, rehabilitation, and retrofit</li> <li>• Encouraging new development to exceed Title 24 energy efficiency requirements.</li> <li>• Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.</li> <li>• Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at <a href="http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits">www.energystar.gov/index.cfm?c=Products.pr_tax_credits</a>.</li> <li>• Encouraging landscaping that requires no additional irrigation: utilizing native, drought-tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.</li> <li>• Encouraging combined heat and power (CHP), also known as cogeneration, in all buildings.</li> <li>• Encouraging neighborhood energy systems, which allow communities to generate their own electricity</li> <li>• Orienting streets and buildings for best solar access.</li> <li>• Encouraging buildings to obtain at least 20 percent of their electric load from renewable energy.</li> </ul>	<p><b>Consistent.</b> Green building measures are implemented at the local level via the County's Green Building Ordinance. As previously described, the new buildings and infrastructure would be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the County's Green Building Ordinance and Title 24. The Project would feature sustainable design elements such as drought-tolerant landscapes, best management practices for water management on-site, and high efficiency utilities and infrastructures.</p>

**Table IV.H-4 (Continued)**  
**Project Consistency with the Southern California Association of Governments'**  
**Regional Comprehensive Plan**

Goals and Policies	Project Consistency
<p><b>Policy EN-11:</b> Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.</p>	<p><b>Consistent.</b> The LADWP and the Southern California Gas Company were consulted during the preparation of this Draft EIR. The estimated electricity and natural gas demands submitted to LADWP and the Southern California Gas Company are provided in Appendix N of this Draft EIR. All infrastructure improvements necessary for Project construction would be completed in accordance with the specifications of the LADWP and the Southern California Gas Company.</p>
<p><b>Policy EN-14:</b> Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.</p>	<p><b>Consistent.</b> As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, development of the Project would implement project design features that would reduce vehicular trips, reduce vehicle miles traveled, and encourage use of alternative modes of transportation, including the continued use of shuttles to and from the Universal City/Studio City Metro Red Line Station. The Project Site is also conveniently located adjacent to a Metro bus stop and a major thoroughfare, Cahuenga Boulevard, and the Hollywood Freeway, thereby reducing vehicle miles traveled and associated vehicular emissions.</p>
<b>Air Quality</b>	
<p><b>Goal:</b> Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.</p>	<p><b>Consistent.</b> As discussed in Section IV.B, Air Quality, of this Draft EIR, Project development would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would be consistent with the goals and policies of the AQMP for the control of fugitive dust.</p>
<p><b>Goal:</b> Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.</p>	<p><b>Consistent.</b> The Project would incorporate sustainability design features to reduce vehicle miles traveled and to reduce potential impacts with respect to greenhouse gas emissions such as drought-tolerant landscapes, best management practices for water management on-site, and high efficiency utilities and infrastructures. Implementation of the project design features would result in a net decrease in greenhouse gas emissions that represents a substantial break from "business as usual."</p>
<p><b>Goal:</b> Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM<sub>10</sub>, PM<sub>2.5</sub>, ultrafine), and carbon monoxide.</p>	<p><b>Consistent.</b> As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would not result in significant air quality impacts with regard to regional and localized emissions during construction and operation of the Project.</p>
<p><b>Goal:</b> Expand green building practices to reduce</p>	<p><b>Consistent.</b> As previously described, the Project would</p>

**Table IV.H-4 (Continued)**  
**Project Consistency with the Southern California Association of Governments'**  
**Regional Comprehensive Plan**

Goals and Policies	Project Consistency
energy-related emissions from developments to increase economic benefits to business and residents.	be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the County's Green Building Ordinance. New construction would feature sustainable design elements such as drought-tolerant landscapes, best management practices for water management on-site, and high efficiency utilities and infrastructures.
<b>Solid Waste</b>	
<p><b>Policy SW-14:</b> Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>• An ordinance that requires the inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>• Source reduction through: (1) use of building materials that are more durable and easier to repair and maintain; (2) design to generate less scrap material through dimensional planning; (3) increased recycled content; (4) use of reclaimed building materials; and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).</li> <li>• Reuse of existing building structure and shell in renovation projects.</li> <li>• Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:</li> <li>• Development of indoor recycling program and space.</li> <li>• Design for deconstruction.</li> <li>• Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable</li> </ul>	<p><b>Consistent.</b> As described above, new buildings and infrastructure would be designed to be environmentally sustainable and to achieve LEED Certification or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the County's Green Building Ordinance. New construction would feature sustainable design elements such as drought-tolerant landscapes, best management practices for water management on-site, and high efficiency utilities and infrastructures. Non-hazardous demolition and construction debris generated from the construction of new Project buildings would also be recycled and/or salvaged for reuse. In addition, the County would continue and enhance existing solid waste features within the Project Site, such as recycling, to reduce the volume of waste to landfill during operation.</p>

**Table IV.H-4 (Continued)  
Project Consistency with the Southern California Association of Governments'  
Regional Comprehensive Plan**

Goals and Policies	Project Consistency
task lighting and other reusable components.	
<b>Transportation</b>	
<b>Goal:</b> A more efficient transportation system that reduces and better manages vehicle activity.	<b>Consistent.</b> As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, development of the Project would implement project design features that would reduce vehicular trips, reduce vehicle miles traveled, and encourage use of alternative modes of transportation, including the continued use of shuttles to and from the Universal City/Studio City Metro Red Line Station. The Project Site is also conveniently located adjacent to a Metro bus stop and a major thoroughfare, Cahuenga Boulevard, and the Hollywood Freeway, thereby reducing vehicle miles traveled and associated vehicular emissions. As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, with implementation of project design features, traffic impacts would be less than significant.
<b>Security and Emergency Preparedness</b>	
<b>Goal:</b> Prevent, protect, respond to, and recover from major human-caused or natural events in order to minimize the threat and impact to lives, property, the transportation network and the regional economy.	<b>Consistent.</b> Existing emergency response and evacuation plans would be updated and/or new plans created, as appropriate, to address operation of the Project. Therefore, no adverse impacts to emergency response or emergency evacuation plans are anticipated.
<hr/> <p><i>Source: Southern California Association of Governments Regional Comprehensive Plan; Matrix Environmental, 2014.</i></p>	

would not have a significant long-term impact on the region’s ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of respirable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and nitrogen oxides (NO<sub>x</sub>). Also, the Project would be consistent with the goals and policies of the Air Quality Management Plan for control of fugitive dust. The Project’s long-term influence would also be consistent with the goals and policies of the Air Quality Management Plan and is, therefore, considered consistent with the SCAQMD’s Air Quality Management Plan.

*(d) Metro Congestion Management Program*

As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, the Project would not conflict with the Congestion Management Program as it would not result

throughout the Project Site by creating outdoor plaza areas that would be used as picnic and community space and provide visitors with views of the surrounding hillsides. On-site pedestrian activity would be further improved by enhancing existing parking operations with two new parking structures that would include pedestrian walkways to and from the parking structures and the various components of the Project. The Project would also support the preservation of open space and the existing residential uses by maintaining the undeveloped hillsides, which buffer the surrounding residential uses from the developed areas of the Project Site. Further, the Project would promote environmental sustainability. Therefore, as the Project would be consistent the general intent of the Regional Comprehensive Plan, the Project's impact regarding consistency with the Regional Comprehensive Plan would be less than significant.

*(c) South Coast Air Quality Management District Air Quality Management Plan*

Section IV.B, Air Quality, of this Draft EIR, provides an analysis of the Project's consistency with the Air Quality Management Plan. As discussed therein, the determination of Air Quality Management Plan consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. Project development in significant impacts to the nearby Congestion Management Program intersections or freeway monitoring locations.

### (3) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would be generally consistent with the adopted County and City General Plans and with relevant environmental policies in other applicable plans. As such, the Project's impacts related to land use consistency would be less than significant.

## 4. Cumulative Impacts

Future growth through 2020 (the Project's buildout year) as a result of related projects and general ambient growth would have the potential to alter the existing land use environment due to infill development at increased densities, conversions of vacant land to new development, and/or conversions of land uses. However, future development projects would be subject to existing zoning and land use designations as well as environmental review by the County or City. Therefore, such future projects are not expected to fundamentally alter the existing land use relationships in the community.

As described in Section III, Environmental Setting, of this Draft EIR, a total of 27 related projects were identified within the Project area. The related projects consist of

residential, office, mixed-use, commercial, retail, and institutional uses within areas that, on a general basis, are already developed with such uses. As such, these related projects would occur as urban infill within the context of existing land use patterns and would not be expected to substantially alter those patterns. As illustrated in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, the closest related project to the Project Site is Related Project No. 22, located approximately 0.8-mile southwest of the Project Site. Related Project No. 22 involves the development of a new 100-room hotel. Given its distance from the Project Site and intervening land uses, Related Project No. 22 would not combine with the Project to create any incompatibility with surrounding land uses. Additionally, as the Project would be compatible with existing surrounding land uses and would be generally consistent with applicable land use plans and policies, the Project would not contribute to significant cumulative land use compatibility or consistency impacts. The balance of the related projects would not cause cumulative land use impacts due to distance and/or existing intervening development. As such, cumulative impacts with regard to land use would be less than significant.

## **5. Mitigation Measures**

Based on the above analysis, the Project would be generally consistent with applicable land use plans, policies, and regulations. Thus, no mitigation measures would be required.

## **6. Conclusion**

Impacts related to land use would be less than significant.