

IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation impacts. This section is based on the *Transportation Assessment for the Senior Residential Community at the Bellwood Project* (Transportation Study) prepared by Gibson Transportation Consulting, Inc., dated February 2021, and revised in April 2021 and included as Appendix H.1 of this Draft EIR. The base assumptions of the Transportation Study were outlined in a Memorandum of Understanding (MOU) dated March 2019, which was reviewed and approved by LADOT. A copy of the MOU is provided in Appendix H.1 of this Draft EIR. LADOT also reviewed and approved the Transportation Study prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letter of the Transportation Study is included as Appendix H.2 of this Draft EIR.

California Senate Bill (SB) 743, which went into effect in January 2014, required the Governor's Office of Planning and Research (OPR) to change the way public agencies evaluate transportation impacts of projects under the California Environmental Quality Act (CEQA). Under SB 743, the focus of transportation analysis has shifted from vehicle delay, which is typically measured by traffic Level of Service (LOS), to Vehicle Miles Traveled (VMT) in order to better address the State's goals regarding the reduction of greenhouse gas (GHG) emissions. In accordance with SB 743, on July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines (TAG) dated July 2019 and subsequently updated the TAG in July 2020. The July 2020 TAG defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The scope of the analysis for the Transportation Study summarized herein was developed in consultation with LADOT and is consistent with the July 2020 TAG and CEQA requirements.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) CEQA Guidelines Section 15064.3

In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Section 15064.3 states that generally, land use projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed above, LADOT's July 2020 TAG includes the specific methodologies and guidelines to be used to evaluate the VMT impacts of a project. In addition, as discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and LADOT's TAG.

(b) Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of the CMP no longer apply to any of the 89 local jurisdictions in

Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

(2) Regional

(a) *Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy*

In April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental and public health goals. As stated in the 2016–2040 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations (MPO) throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.¹ Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HFTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HTQAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.² Local jurisdictions are encouraged to focus housing and employment growth within HTQAs.³ The Project Site is located within an HFTA as designated by the 2016–2040 RTP/SCS.^{4,5} Refer to Section IV.E, Land Use and Planning, of this Draft EIR, for a detailed discussion of the relevant provisions of the 2016–2040 RTP/SCS that apply to the Project.

On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.⁶ As with the 2016–2020 RTP/SCS,

¹ SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016, p. 166.

² SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016, p. 189.

³ SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, p. 76.

⁴ SCAG 2016–2040 *Regional Transportation Plan/Sustainable Communities Strategy*, p. 77, Exhibit 5.1: *High Quality Transit Areas in the SCAG Region for 2040 Plan*.

⁵ Los Angeles County Metropolitan Transportation Authority (Metro). “*High Quality Transit Areas—Southwest Quadrant*.”

⁶ SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California’s long-term economic viability.⁷ The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.

(3) Local

(a) *City of Los Angeles Mobility Plan 2035*

As an update to the prior Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035: An Element of the General Plan (Mobility Plan) in August 2015. The City Council readopted the Mobility Plan in January 2016 and again in September 2016 upon consideration of additional amendments.⁸ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. Refer to Section IV.E, Land Use and Planning, of this Draft EIR, for a discussion of the Project’s consistency with Mobility Plan 2035.

Street classifications/standards are designated in Mobility Plan 2035 and detailed in *The City of Los Angeles Complete Streets Design Guide* (Great Streets for Los Angeles). The Mobility Plan’s street standards seek to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Roadways are defined as follows in the Mobility Plan:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Arterial Streets—Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:

⁷ SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

⁸ Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

- Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:
 - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 mph.
 - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.
- Avenues pass through both residential and commercial areas and include three categories:
 - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
 - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
 - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.
- Collector Streets—Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local Streets can be:
 - Continuous local streets that connect to other streets at both ends; or
 - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within 1 mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the

goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

(b) West Los Angeles Transportation Improvement and Mitigation Specific Plan Area

The Project Site is located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (West LA TIMP), adopted March 8, 1997 and amended June 28, 2019. The West LA TIMP is the transportation Specific Plan for a broad area between the Hollywood Hills to the north, the City of Santa Monica boundary to the west, the City of Culver City boundary to the south, and the City of Beverly Hills boundary to the east. The West LA TIMP is intended to regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses, and promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies. The West LA TIMP is intended to provide a mechanism to fund specific transportation improvements that would mitigate transportation impacts generated by new development. A Transportation Impact Assessment (TIA) process and fee has been established for new development. However, the West LA TIMP exempts eldercare facilities from the TIA fee.⁹

(c) Vision Zero

As described in *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025* (City of Los Angeles, August 2015), Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. Vision Zero has identified the High Injury Network, a network of streets identified based on collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. In the vicinity of the Project Site, Santa Monica Boulevard west of Beverly Glen Boulevard has been identified as part of the High Injury Network.¹⁰ The Project Site is not located along a High Injury Network corridor and no Project Site access is proposed along a High Injury Network corridor.

(d) Plan for Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (LADCP, March 2015) (*Plan for a Healthy Los Angeles*) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and

⁹ City of Los Angeles Municipal Code, Section 19.19.D.1.j.

¹⁰ LADOT Livable Streets, Maps, Neighborhoods, Networks, and Zones, High Injury Networks, <https://ladotlivablestreets.org/overall-map/maps>, accessed June 20, 2021.

environmental issues. Plan for a Healthy Los Angeles includes policies directing several City departments to develop plans that promote active transportation and safety.

(e) Los Angeles Municipal Code

With regard to construction traffic, Section 41.40 of the Los Angeles Municipal Code (LAMC) limits construction activities to the hours from 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

The LAMC also sets forth parking requirements for certain land uses. The parking requirements for the Project are based on rates provided in LAMC Section 12.21.A4(d)(5) for eldercare facilities. Additionally, in accordance with LAMC Section 12.21.A4(u), the code parking requirement for senior independent living and assisted living uses may be reduced if certain criteria are met. Based on these code requirements, the Project is required to provide a minimum of 81 vehicular parking spaces with application of the allowable reductions for senior independent living and assisted living spaces. The Project would provide a minimum of 81 vehicular parking spaces in accordance with code requirements.

In addition, LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The Project would provide a total of 24 short-term and 48 long-term spaces to satisfy the LAMC requirements for on-site bicycle parking supply.

(f) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design, which serves to reduce VMT. These guidelines include the following:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

b. Existing Conditions

(1) Existing Street Systems

The Project's transportation analysis evaluated a Study Area that is approximately 1.5 miles (north-south) by approximately 1 mile (east-west) and is generally bounded by Santa Monica Boulevard to the north, Avenue of the Stars to the east, Pico Boulevard to the south, and Beverly Glen Boulevard to the west. The Study Area for the Project's transportation analysis was established in consultation with LADOT.

The existing street system in the Study Area consists of primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access.

(a) Streets and Highways

Listed below are the primary streets and highways that provide regional and local access to the Project Site:

- Beverly Glen Boulevard—Beverly Glen Boulevard is a designated Avenue I that travels in the north-south direction and is located approximately 0.2 mile west of the Project Site. Four 11- to 12-foot-wide travel lanes, two lanes in each direction with left-turn lanes at intersections, are provided on Beverly Glen Boulevard within the Study Area. Unmetered on-street parking is generally available on both sides of the street within the Study Area.
- Century Park West—Century Park West is a designated Avenue II that travels in the north-south direction and is located approximately 0.15 mile east of the Project Site. Four 11- to 12-foot-wide travel lanes, two lanes in each direction with left-turn lanes at intersections, are provided on Century Park West within the Study Area. On-street parking is generally not available on this street within the Study Area.
- Avenue of the Stars—Avenue of the Stars is a designated Boulevard II that travels in the north-south direction and is located approximately 0.4 mile east of the Project Site. Six 11- to 12-foot-wide travel lanes, three lanes in each direction with left-turn lanes at intersections and a center median, are provided on Avenue of the Stars within the Study Area. On-street parking is generally not available on this street within the Study Area.
- Motor Avenue—Motor Avenue is a designated Collector Street that travels in the north-south direction and is located approximately 0.4 mile southeast of the Project Site. Two 12-foot-wide travel lanes, one lane in each direction with left-turn lanes at intersections and a center median, are provided on Motor

Avenue within the Study Area. Unmetered on-street parking is generally provided on both sides of the street within the Study Area.

- Bellwood Avenue—Bellwood Avenue is a designated Local Street that travels through the Project Site in the east-west direction and provides access to the existing Project Site driveways. Two 10-foot-wide travel lanes, one in each direction, are provided on Bellwood Avenue within the Study Area. Unmetered on-street parking with permit is available on both sides of the street within the Study Area.
- Santa Monica Boulevard—Santa Monica Boulevard is a designated Boulevard II that travels in the east-west direction and is located approximately 0.55 mile north of the Project Site. Santa Monica Boulevard within the Study Area is also identified as State Route 2. Six 11- to 12-foot-wide travel lanes, three lanes in each direction with left-turn lanes at intersections are provided on Santa Monica Boulevard within the Study Area. An auxiliary one-way travel lane runs adjacent to Santa Monica Boulevard. Metered on-street parking is generally available on both sides of the auxiliary lane within the Study Area. On-street parking is generally not available on Santa Monica Boulevard within the Study Area.
- Olympic Boulevard—Olympic Boulevard is a designated Boulevard II that travels in the east-west direction and is located approximately 350 feet north of the Project Site. Seven 10- to 11-foot-wide travel lanes, three eastbound lanes and four westbound lanes with left-turn lanes at intersections are provided on Olympic Boulevard within the Study Area. Unmetered on-street parking is generally available on the north side of the street with afternoon peak hour restrictions within the Study Area.
- Pico Boulevard—Pico Boulevard is a designated Avenue I that travels in the east-west direction and is located approximately 0.3 mile south of the Project Site. Six 11- to 12-foot-wide travel lanes, three lanes in each direction with left-turn lanes at intersection, are provided on Pico Boulevard. Unmetered on-street parking is generally provided on the north side of the street with afternoon peak hour restrictions, and on the south side of the street with morning and afternoon peak hour restrictions within the Study Area.

(b) Regional Transportation System

(i) Freeways

Primary regional access to the Study Area is provided by Interstate 405 (I-405) and Interstate 10 (I-10). I-405 generally runs in the northwest-southeast direction and is located approximately 1.5 miles west of the Project Site. Access to I-405 in the vicinity of the Project Site is provided via interchanges, which are located outside the Study Area at Wilshire Boulevard, Santa Monica Boulevard, Sawtelle Boulevard, and Sepulveda Boulevard. I-10 generally runs in the east-west direction and is located approximately

1.8 miles south of the Project Site. Access to I-10 in the vicinity of the Project Site is provided via interchanges at Overland Avenue and Manning Avenue, which are located outside of the Study Area.

(ii) Transit System

As shown in Figure IV.I-1 on page IV.I-11, public transit service within the Study Area is currently provided by Metro, Culver City Bus, Santa Monica Big Blue Bus, Antelope Valley Transit Authority, Santa Clarita Transit, and LADOT Commuter Express. Bus stops that serve the Project Site (within a 0.25-mile walking distance) are currently provided along Olympic Boulevard at Beverly Glen Boulevard, Kerwood Avenue, and Century Park West. In addition, the Project Site is located approximately 0.5 mile from the future Metro Purple Line rail station at Constellation Boulevard between Century Park East and Solar Way.

Table IV.I-1, on page IV.I-12, provides a summary of the transit lines operating in the Study Area for each of the service providers, the type of service (peak vs. off-peak, express vs. local), and frequency of service. Table 3 of the Transportation Study summarizes the total available capacity of the transit lines within a 0.25-mile walking distance of the Project Site during the morning and afternoon peak hours based on the frequency of service of each line, the standing capacity of each bus or train, and the average peak hour load in each direction. As shown in Table 3 of the Transportation Study, based on ridership data from March 2019 provided by Culver City Bus and Santa Monica Big Blue Bus, the transit lines within 0.25 mile of the Project Site (Culver City Bus Route 3 and Santa Monica Big Blue Bus Route 5) currently provide a combined capacity for approximately 660 additional riders during the morning peak hour and 636 riders during the afternoon peak hour.

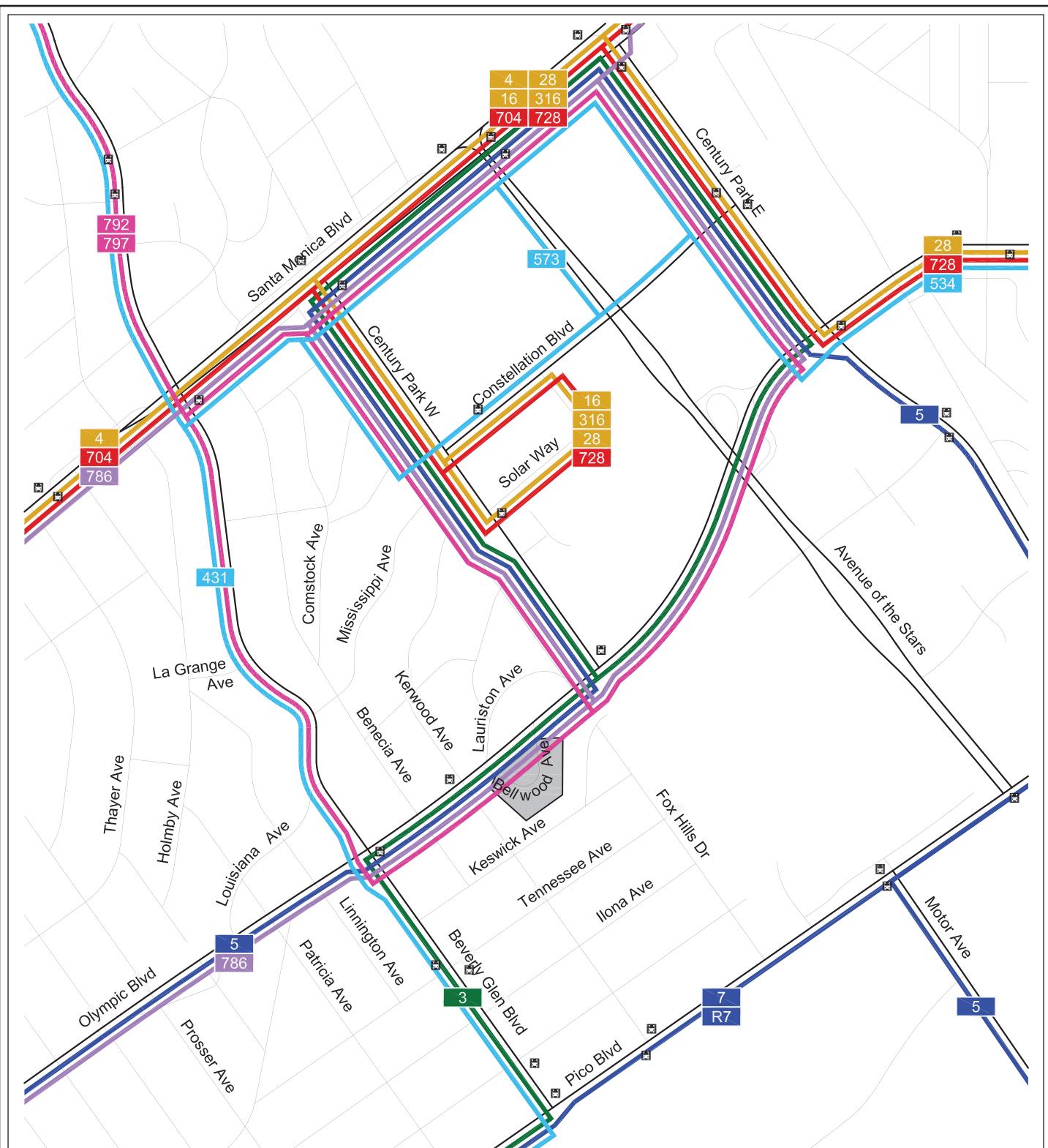
(2) Existing Parking and Site Access

The Project Site currently includes three multi-family residential developments with associated surface parking. Vehicular access to the multi-family residential buildings is provided via several driveways along Bellwood Avenue.

(3) Existing Bicycle and Pedestrian Facilities

(a) Bicycle Facilities

Based on *2010 Bicycle Plan, A Component of the City of Los Angeles Transportation Element*, (Los Angeles Department of City Planning, adopted March 1, 2011) (2010 Bicycle Plan), the existing bicycle system consists of a limited network of bicycle lanes (Class II) and bicycle routes (Class III). Class II bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Class III



N
Not to Scale

Figure IV.I-1
Existing Transit Service in the Study Area

Table IV.I-1
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)			
			A.M. Peak Period		P.M. Peak Period	
			NB/EB	SB/WB	NB/EB	SB/WB
Metro						
4 Downtown Los Angeles–Santa Monica via Santa Monica Blvd.	Local	24-Hour	13	13	11	13
16 Downtown Los Angeles–Century City via 3rd Street	Local	4:15 A.M.–1:30 A.M.	18	11	15	16
28 Downtown Los Angeles–Eagle Rock–Century City via Olympic Blvd. and Eagle Rock Blvd.	Local	6:30 A.M.–10:00 P.M.	8	8	8	9
316 Downtown Los Angeles–Century City via 3rd Street	Limited	6:15 A.M.–7:00 P.M.	9	11	11	10
704 Downtown Los Angeles–Santa Monica via Santa Monica Blvd.	Rapid	6:00 A.M.–12:00 A.M.	15	12	13	13
728 Downtown Los Angeles–Century City via West Olympic Blvd.	Rapid	5:00 A.M.–9:00 P.M.	13	13	15	14
Culver CityBus (CC)						
3 Crosstown Culver City	Local	5:30 A.M.–11:30 P.M.	16	14	16	16
Santa Monica Big Blue Bus (BBB)						
5 Santa Monica–Century City–Palms Station Expo Line	Local	6:00 A.M.–9:30 P.M.	27	27	24	22
7 Downtown Santa Monica–Rimpau Transit Center	Local	5:00 A.M.–12:30 A.M.	15	15	15	15
R7 Downtown Santa Monica–Koreatown	Rapid	5:30 A.M.–11:15 P.M.	10	10	10	10
Antelope Valley Transit Authority (AVTA)						
786 Lancaster/Palmdale–Century City/West Los Angeles	Express	4:00 A.M.–7:30 P.M.	N/A	20	24	N/A
Santa Clarita Transit (SC)						
792 Santa Clarita–Century City–UCLA–Westwood	Express	7:00 A.M.–6:30 P.M.	30	N/A	N/A	30
797 Santa Clarita–Century City–UCLA–Westwood	Express	5:15 A.M.–9:00 P.M.	N/A	20	30	N/A
LADOT Commuter Express (CE)						
431 Westwood–Palms–Downtown Los Angeles	Express	6:30 A.M.–7:30 P.M.	30	N/A	N/A	30
534 Westwood–Century City–West Los Angeles–Downtown Los Angeles	Express	7:00 A.M.–6:30 P.M.	23	N/A	N/A	23
573 Westwood–Encino–Mission Hills–Century City	Express	5:30 A.M.–8:00 P.M.	^a	9	9	^a
<i>LADOT = Los Angeles Department of Transportation</i>						

Table IV.I-1 (Continued)
Existing Transit Service

Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (minutes)					
			A.M. Peak Period		P.M. Peak Period			
			NB/EB	SB/WB	NB/EB	SB/WB		
<i>Metro = Los Angeles County Metropolitan Transportation Authority</i>								
<i>A.M. Peak from 6 A.M.–10 A.M.</i>								
<i>P.M. Peak from 3 P.M.–7 P.M.</i>								
^a LADOT CE 573 provides one stop in the northbound direction during the A.M. peak period and southbound direction during the P.M. peak period.								
Source: Gibson Transportation Consulting, Inc., 2020.								

bicycle routes and bicycle-friendly streets are those where motorists and cyclists share the roadway and there is no separated striping for bicycle travel. Bicycle routes and bicycle-friendly streets are preferably placed on collector and low volume arterial streets. Bicycle routes with shared lane markings, or “sharrows,” remind bicyclists to ride farther from parked cars to prevent collisions, increase awareness of motorists that bicycles may be in the travel lane, and show bicyclists the correct direction of travel.

The components of the 2010 Bicycle Plan have been incorporated into the bicycle network of the Mobility Plan. The Mobility Plan includes a Bicycle Enhanced Network (Low-Stress Network) (BEN) and a Bicycle Lane Network (BLN). The BEN is a subset of and supplement to the 2010 Bicycle Plan and is comprised of a network of streets that prioritize bicyclists and provide bicycle paths and protected bicycle lanes (Class IV). The BLN consists of Class II bicycle lanes with striped separation from motorized vehicle traffic. Within the immediate vicinity of the Project Site, Class II bicycle lanes are provided along Motor Avenue and Santa Monica Boulevard west of Avenue of the Stars.

(b) Pedestrian Facilities

The area surrounding the Project Site includes a network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. Currently along the Project frontage, sidewalks along both sides of Bellwood Avenue serving as routes to the Project Site provide connectivity, connecting to pedestrian crossings at intersections within the Study Area. The nearby signalized study intersections provide pedestrian facilities, including curb ramps on all approaches, pedestrian phasing, high-visibility crosswalk striping, and Americans with Disabilities Act (ADA) accessible curb ramps. In addition, the signalized intersection of Century Park West & Olympic Boulevard provides pedestrian facilities including marked pedestrian crossings on all approaches, pedestrian phasing, and ADA accessible ramps. .

c. Future Conditions

(1) Related Projects

The transportation analysis for the Project considered the effects of other development proposals (related projects) either proposed, approved, or under construction in the Study Area. The list of related projects in the vicinity of the Project Site that could affect traffic conditions in the Study Area is based on information on file at the City of Los Angeles Department of City Planning and LADOT. A total of six related projects were identified in the vicinity of the Project Site, as summarized in Table III-1 in Section III, Environmental Setting, of this Draft EIR.

(2) Future Improvements

(a) 2010 Bicycle Plan

Within the Study Area, the 2010 Bicycle Plan proposes dedicated bicycle lanes on Avenue of the Stars, Pico Boulevard, and Beverly Glen Boulevard north of Santa Monica Boulevard. No bicycle routes/bicycle friendly streets are proposed within the Study Area. There is no schedule of implementation for these improvements, therefore, no changes to vehicular lane configurations as a result of potential new bicycle lanes were assumed in the transportation analysis.

(b) Mobility Plan

In the Mobility Plan, the City identifies key corridors as components of various “mobility-enhanced networks.” Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified and there is no schedule for implementation; therefore, no changes to vehicular lane configurations within the Transportation Study were made as a result of the Mobility Plan. However, as set forth in the Transportation Study, the Study Area does include the following mobility-enhanced networks:

- Transit Enhanced Network (TEN): The TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. Pico Boulevard and Santa Monica Boulevard within the Study Area have been designated as part of the TEN.
- Neighborhood Enhanced Network (NEN): The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. The NEN designates Tennessee Avenue within the Study Area as part of the network.
- Bicycle Enhanced Network (BEN): Santa Monica Boulevard west of Century Park East within the Study Area has been identified as part of the BEN.
- Bicycle Lane Network (BLN): Avenue of the Stars, Pico Boulevard, and Beverly Glen Boulevard north of Santa Monica Boulevard within the Study Area have been identified as part of the BLN.
- Pedestrian Enhanced District (PED): The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street

trees, and pedestrian-oriented design features. Beverly Glen Boulevard north of La Grange Avenue and between Louisiana Avenue and Ilona Avenue, Olympic Boulevard west of Benecia Avenue and east of Bellwood Avenue, Century Park West, Avenue of the Stars, Constellation Boulevard, and Santa Monica Boulevard within the Study Area are designated as part of the PED.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;*

Threshold (b): *Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);*

Threshold (c): *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or*

Threshold (d): *Result in inadequate emergency access.*

For this analysis, the Appendix G Thresholds provided above are relied upon. The methodology and base assumptions used in this analysis were established by LADOT.

b. Methodology

(1) Consistency with Plans, Programs, Ordinances, or Policies

As described above, CEQA Guidelines threshold (a) has been updated to require an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below evaluates the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. The content of this analysis is informed by the guidance provided in LADOT's TAG. In accordance with the TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will be considered to be consistent.

(2) Vehicle Miles Traveled

As discussed above, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. In accordance with SB 743 and CEQA Guidelines Section 15064.3, the CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. Thus, for CEQA purposes, the Project's Transportation Study addresses VMT under the new thresholds. For informational purposes only, and not for determining the potential impacts of the Project under CEQA, the Transportation Study also includes an analysis that is based on the adopted guidelines, methodologies, and thresholds that were in effect at the time the MOU was approved (level of service or LOS).

LADOT's TAG define the methodology of analyzing a project's transportation impacts using VMT. Threshold T-2.1 of LADOT's TAG provides the following series of screening criteria to determine if a development project would require further VMT evaluation. If a project requires a discretionary action and does not satisfy either T-2.1-1 or T-2.1-2, as detailed below, a "No Impact" determination can be made:

- T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?
- T-2.1-2: Would the project generate a net increase in daily VMT?

As summarized in Table IV.I-2 on page IV.I-29 in the analysis below, the Project would generate a net reduction in daily trips and, therefore, generate a net reduction in daily VMT. Thus, the Project would not require further VMT evaluation under the City's adopted VMT thresholds (T-2.1-1 or T-2.1-2) and a "No Impact" determination can be made.

(3) Hazardous Geometric Design Features

The TAG include a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Project design, including proposed infrastructure

improvements, land uses, and open spaces, are reviewed to determine if the Project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

(4) Emergency Access

The analysis of the Project's potential access impacts includes a review of the proposed vehicular access points and internal circulation. A determination was made regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

- TR-PDF-1:** A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval, prior to the issuance of a demolition permit or building permit. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:
- Advance notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
 - Prohibition of construction worker or equipment parking on adjacent streets.
 - Temporary traffic control during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men), as appropriate.
 - Containment of Project construction activity associated with the new building and on-site improvements within the Project Site boundaries.
 - Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
 - Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours to the extent feasible. (Commuter peak hours are 7:00 A.M. to 9:00 A.M. and 3:00 P.M. to 6:00 P.M.).
 - Spacing of trucks so as to discourage a convoy effect (e.g., vehicles traveling together as a group).

- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.
- Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access.

d. Analysis of Project Impacts

Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

(1) Impact Analysis

LADOT's TAG provides screening questions to determine which plans, policies, ordinances and programs addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, are relevant to a project. As set forth in the Transportation Study, based on those questions, the following apply to the Project: the Mobility Plan; Vision Zero; Citywide Design Guidelines; Plan for a Healthy Los Angeles; and the LAMC.

(a) Mobility Plan 2035

(i) Mobility Plan Policies

Policy 1.1 Roadway User Vulnerability—Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user: Access to the Project Site would be provided via one full-access driveway on Bellwood Avenue, and a separate service driveway would provide access to the loading area adjacent to the parking entry/exit driveway. Additionally, the portion of Bellwood Avenue that currently bisects the Project Site would be vacated and realigned,¹¹ with through public access maintained from both sides of Bellwood Avenue. Separate pedestrian access from Bellwood Avenue would be provided primarily via the building's lobby entrance along the realigned portion of Bellwood Avenue, with two additional pedestrian access points for residents and employees near the bistro terrace and near the memory care lobby. Bicyclists would have the same access

¹¹ The reconfigured Bellwood Avenue is currently proposed to become a private street; however, in the event Bellwood Avenue remains a public street, the Project would still implement the proposed vacation and realignment and through public access would also be maintained.

opportunities as pedestrians. Therefore, the Project would not conflict with Mobility Plan Policy 1.1.

Policy 1.6 Multi-Modal Detour Facilities—Design detour facilities to provide safe passage for all modes of travel: Construction activities associated with the new building and on-site improvements would be maintained on-site. Any temporary impediments to the public right-of-way would be addressed with implementation of the Construction Management Plan (Project Design Feature TR-PDF-1). Therefore, the Project would not conflict with Mobility Plan Policy 1.6.

Policy 2.2 Complete Streets Design Guide—Establish the Complete Streets Design Guide as the City’s document to guide the operations and design of streets and other public rights-of-way: As part of the Project, Bellwood Avenue would be improved with consideration of the safety of all users, including pedestrians, bicyclists, and vehicles. Specifically, the realigned portion of Bellwood Avenue would be developed in accordance with City requirements and would include an entry motor court for pick-up and drop-off of eldercare facility residents. Additionally, the primary access driveway to the below-grade parking would be located further to the north so as to reduce conflict with drop-off activities. The Project would also provide parking in subterranean structures rather than rely, in part, on street parking on Bellwood Avenue, which would increase pedestrian safety as it decreases interface between vehicles and pedestrians. Furthermore, the Project would provide enhanced sidewalks and street improvements (including new street trees and required lighting) along portions of the Project Site’s Bellwood Avenue frontage. Therefore, the Project would not conflict with Mobility Plan Policy 2.2.

Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment: The Project would support and would not preclude the implementation of this citywide policy. The realignment of Bellwood Avenue would maintain pedestrian access on both sides of Bellwood Avenue. Streetscape amenities, such as new street trees on Bellwood Avenue and lighting fixtures in accordance with Bureau of Street Lighting standards and other elements would enhance the pedestrian experience. In addition, the Project would provide improvements to the sidewalks with wider widths along portions of Bellwood Avenue adjacent to the Project Site. The Project would also include a bistro terrace and lobby, providing an active ground floor with pedestrian friendly improvements. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets: No access to the Project Site is provided along street segments identified in the Neighborhood Enhanced Network and Project traffic would not interfere with the neighborhood character of the surrounding area. In addition, as part of the Project,

the portion of Bellwood Avenue that travels through the Project Site would be vacated and realigned. Through public vehicular and pedestrian access would be maintained from both sides of Bellwood Avenue, and a vehicle turn-out adjacent to the building's lobby entrance would be provided along with sidewalk and streetscape improvements. Thus, Bellwood Avenue would continue to serve as a slow speed local street (i.e., 15 to 20 miles per hour). Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service: The Project would support and would not conflict with the implementation of this citywide policy. As detailed in the Transportation Study included in Appendix H of this Draft EIR, the Project would result in a net reduction of trips. As such, the Project demand for transit service would not exceed the regional transit system capacity described in Table 3 of the Transportation Study. Accordingly, it is concluded that the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with Mobility Plan Policy 2.5.

Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities: The Project would support and would not conflict with the implementation of this citywide policy. The Project Site is not located adjacent to any roadways designated within the Bicycle Lane Network. In addition, Project visitors, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors, with access to the Project Site via improved sidewalks along the realigned Bellwood Avenue, as well as internal pathways with access to the central courtyards and lobby entrances. In addition, the Project would provide 72 bicycle parking spaces (24 short term spaces readily available on the ground floor along Bellwood Avenue and 48 long term spaces located on the P2 parking level). Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system: This is a citywide policy that does not apply to the Project because no changes to regional access are proposed as part of the Project. Primary regional access would continue to be provided via Olympic Boulevard to Santa Monica Boulevard (State Route 2), the Santa Monica Freeway (I-10), and the San Diego Freeway (I-405), which are all accessible within 2 miles of the Project Site. Therefore, the Project would not conflict with or preclude the implementation of Mobility Plan Policy 2.7.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: An entry motor court/vehicle turn-out area would be provided along Bellwood Avenue adjacent to the Project Site and would be located adjacent to the lobby area. Access to the subterranean parking would occur from one entry/exit driveway located along Bellwood Avenue near the northern boundary of the building. A separate service driveway, providing access to the loading area, would be located on Bellwood

Avenue adjacent to the parking entry/exit driveway. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Policy 3.1 Access for All—Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City’s transportation system: The Project encourages multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project provides an entry motor court/vehicle turn-out area adjacent to the Project lobby entrance along the realigned portion of Bellwood Avenue. Furthermore, the Project provides infrastructure such as enhanced sidewalks and bicycle parking to encourage walking and bicycling. Therefore, the Project would not conflict with Mobility Plan Policy 3.1.

Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way: The Project’s vehicular and pedestrian entrances would be designed in consideration of LADOT standards and would comply with American with Disabilities Act (ADA) requirements and would provide direct connections to pedestrian amenities at adjacent intersections. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

Policy 3.5 Multi-Modal Features—Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders: The Project would provide enhanced sidewalks and bicycle parking amenities to promote multi-modal connectivity. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.

Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities: The Project would provide short-term (24 spaces) at the ground floor along Bellwood Avenue and long-term (48 spaces) bicycle parking within Level P2, in conformance with the LAMC.. Furthermore, as discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, including private on-site security, a closed circuit security camera system, and keycard entry for the building and the parking areas (pursuant to Project Design Feature POL-PDF-2). Therefore, the Project would not conflict with Mobility Plan Policy 3.8.

Policy 4.5 Improved Communication—Facilitate communications between citizens and the City in reporting on and receiving responses to non-emergency street improvements: As part of the Project’s Construction Management Plan, advance notification to the adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of construction, would be provided. Therefore, the Project would not conflict with Mobility Plan Policy 4.5.

Policy 4.8 Transportation Demand Management Strategies—Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles: The Project would promote and provide employees, residents, and visitors with opportunities to utilize alternative transportation modes. Specifically, the Project would provide shuttle service for the eldercare residents, sidewalk and street improvements along the Project Site's Bellwood Avenue frontage, and on-site pedestrian paths. The Project would also provide bike parking facilities, including 72 bike parking spaces per LAMC requirements.. Therefore, the Project would not conflict with Mobility Plan Policy 4.8.

Policy 4.13 Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives: The Project would provide sufficient off-street parking to accommodate the Project in compliance with LAMC requirements. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.

Policy 4.14 Wayfinding—Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms: The Project would incorporate illumination for parking signage, and security purposes. Therefore, the Project would not conflict with Mobility Plan Policy 4.14.

Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health: The Project would provide bicycle and pedestrian facilities and connections throughout the Project Site. Specifically, the Project would provide: (1) bicycle parking spaces meeting LAMC requirements that would serve to promote use of bicycles; (2) enhanced sidewalks with new street trees and other improvements along the Project Site's Bellwood Avenue frontage; and (3) a pedestrian pathway around the westerly, southerly and easterly setbacks of the Project providing connectivity to the ground-level on-site courtyard and other ground-level open spaces for Project residents. In addition, the Project would provide charging facilities for electric vehicles. Therefore, the Project would not conflict with Mobility Plan Policy 5.1.

Policy 5.2 Vehicle Miles Traveled (VMT)—Support ways to reduce vehicle miles traveled (VMT) per capita: The Project would provide residents, employees, and visitors the opportunity to utilize alternative transportation modes to reduce VMT by reducing the number of single occupancy vehicle trips to the Project Site and encouraging walking and non-automotive forms of transportation. As discussed above, the Project would provide shuttle service for the eldercare residents, sidewalk and street improvements along the Project Site's Bellwood Avenue frontage, on-site pedestrian paths, and bike parking facilities (including 72 bike parking spaces per LAMC requirements). Therefore, the Project would not conflict with Mobility Plan Policy 5.2.

Policy 5.4 Clean Fuels and Vehicles—Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure: The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area, thus incorporating design features to provide residents, employees, and visitors the opportunity to utilize alternative fuels and new mobility technologies. Therefore, the Project would not conflict with Mobility Plan Policy 5.4

(ii) Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed in the policy analysis above, i the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced District, and Bicycle Network. The Project would not result in an increased demand for public transit when compared with existing conditions. In addition, the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. The Project would improve adjacent sidewalks along the realigned portion of Bellwood Avenue on both sides of the street to create a walkable and attractive pedestrian environment. In addition, paved walkways would be provided internal to the Project Site with access to and from Bellwood Avenue. Project access locations would also be required to conform to City standards and would be designed to provide adequate sight distance, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, bicycle access would also continue to be provided by Bellwood Avenue and the Project would provide 72 bicycle parking spaces, including 24 readily accessible bicycle parking spaces along Bellwood Avenue. Furthermore, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveway is not proposed along a street with an existing bicycle facility. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

(iii) Mobility Plan Programs PL.1 and PK.10

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Vehicular access to the Project Site would be provided via Bellwood Avenue, which is a non-arterial street. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. While this is a citywide program, the Project would not conflict with its implementation. Specifically, as discussed above, the Project would include streetscape

improvements along Bellwood Avenue that would promote walking. In addition, the design and implementation of driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan check review process to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

(b) *Vision Zero*

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The segment of Olympic Boulevard in the vicinity of the Project has not been identified in the High Injury Network and the Project is not located along a High Injury Network corridor. Nonetheless, the Project improvements to the pedestrian environment, including widened and enhanced sidewalks along the Project's frontages, would not preclude future Vision Zero safety improvements by the City. In addition, pedestrian and vehicular access within the Project Site would conform with City requirements. Therefore, the Project would not conflict with Vision Zero.

(c) *Citywide Design Guidelines*

As discussed above, the Citywide Design Guidelines include promoting a safe, comfortable, and accessible pedestrian experience for all; carefully incorporating vehicular access such that it does not degrade the pedestrian experience; and designing projects to actively engage with streets and public space and maintain human scale. The Project would support these guidelines as the design includes accessible sidewalks, pedestrian amenities, and a well-designed vehicular access driveway in accordance with the City's design considerations. Specifically, the Project would prioritize pedestrian access by providing sidewalks with new streetscape improvements along both sides of Bellwood Avenue. For example, the Project would provide street trees uniformly within the sidewalk to provide adequate shade to enhance the pedestrian experience. The Project would improve adjacent sidewalks along Bellwood Avenue on both sides of the street to create a walkable and attractive pedestrian environment. The Project would provide improvements to the sidewalks with wider widths along portions of Bellwood Avenue and would also include a bistro terrace and lobby, providing an active ground floor with pedestrian friendly improvements. In addition, bicycle access would also continue to be provided by Bellwood Avenue and the Project would provide readily accessible bicycle parking spaces along Bellwood Avenue. Vehicular access into the proposed subterranean parking garage would be provided via one full-access driveway on Bellwood Avenue near the northern boundary of the Project Site. The driveway would be designed in accordance with LADOT standards and would minimize queuing on the adjacent street system. An entry motor court/vehicle turn-out area would be provided along Bellwood Avenue adjacent to the Project Site within the realigned portion of the roadway and would be located adjacent to the lobby area to accommodate pick-up and drop-off of Project residents, who may have mobility challenges

and/or need assistance. A separate service driveway, providing access to the loading area, would be located on Bellwood Avenue east of the parking garage. Therefore, the Project would be designed to minimize pedestrian/vehicular interaction. Overall, the Project would improve access and circulation along Bellwood Avenue by reducing the number of individual driveways and consolidating all non-service related access to one driveway. The Project would also maintain continuity of the sidewalk by limiting driveway curb cuts to the eastern portion of the Project Site. Therefore, the Project would not conflict with the Citywide Design Guidelines regarding pedestrian design.

(d) Other Programs, Plans, Ordinances, and Policies

The Project would not conflict with the Plan for a Healthy Los Angeles. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing in an infill area near transit, as well as enhancing the pedestrian environment, providing bicycle parking, complying with ADA requirements, and providing direct connections to uses along Olympic Boulevard. As discussed in detail in Section IV.E, Land Use and Appendix E, Land Use Tables, of this Draft EIR, the Project would not conflict with the West Los Angeles Community Plan policies related to encouraging pedestrian activity and reducing single occupancy vehicle trips. The Project would provide direct and safe access for pedestrians and bicyclists with the enhanced sidewalks, and separate drop-off areas and bicycle facilities to promote the reduction in single occupancy vehicle trips. In addition, construction activities associated with the Project would occur in accordance with LAMC Section 41.40, which limits construction activities to the hours from 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and national holidays. Furthermore, as described in more detail below, in accordance with LADOT guidance, a Construction Management Plan would be implemented for the Project (per Project Design Feature TR-PDF-1). Additionally, as discussed above, the Project would provide a minimum of 81 vehicular parking spaces and would thus satisfy LAMC parking requirements. Also, the Project would provide a total of 24 short-term and 48 long-term spaces to satisfy LAMC 12.21.A.16 for on-site bicycle parking supply. The Project would also comply with all applicable LADOT design standards. As an eldercare facility, the Project would not be subject to the West Los Angeles Transportation Improvement and Mitigation Specific Plan requirements, including payment of TIA fees. Therefore, the Project would not conflict with these programs, plans, ordinances, and policies.

Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts related to the consistency with adopted City plans, programs, ordinances and policies regarding the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the consistency with adopted City plans, programs, ordinances, and policies regarding the circulation system were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

(1) Impact Analysis

As discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.¹² Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.¹³

As previously discussed above in the Methodology Subsection, LADOT's TAG defines the methodology of analyzing a project's transportation impacts using VMT. Threshold T-2.1 of LADOT's TAG provides the following series of screening criteria to determine if a development project would require further VMT evaluation. If a project requires a discretionary action and does not satisfy either T-2.1-1 or T-2.1-2, as detailed below, a "No Impact" determination can be made:

- T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?
- T-2.1-2: Would the project generate a net increase in daily VMT?

¹² CEQA Guidelines Section 15064.3(b)(1).

¹³ CEQA Guidelines Section 15064.3(b)(1).

The VMT Calculator does not include eldercare facility as a land use option. Therefore, in consultation with LADOT, a custom land use input was developed based on published trip generation rates in Trip Generation Manual, 10th Edition and a review of other residential type land uses available in the VMT Calculator. Based on the Project's proposed land uses and location, the Project is expected to generate a net reduction of 75 daily trips. In addition, as summarized in Table IV.I-2 on page IV.I-29, the Project is also estimated to generate a net reduction of A.M. and P.M. trips. Specifically, the Project would result in 16 fewer net morning peak hour trips and nine fewer net afternoon peak hour trips. Therefore, the Project satisfies the screening criteria under T-2.1-1 for a "no impact" determination. **Thus, the Project would not require further VMT evaluation under the City's adopted VMT thresholds (T-2.1-1 or T-2.1-2) and no impact related to VMT would occur as part of the Project.**

(2) Mitigation Measures

No Project-level impacts with respect to CEQA Guidelines Section 15064.3 would occur. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

No Project-level impacts with respect to CEQA Guidelines Section 15064.3 would occur. Therefore, no mitigation measures were required or included.

Threshold (c): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project (included in Appendix A of this Draft EIR), through public access would be maintained from both sides of Bellwood Avenue through the Project Site, and the existing intersections of Bellwood Avenue and Olympic Boulevard would not be affected by the proposed realignment of Bellwood Avenue as part of the Project. In addition, the proposed realignment would not introduce any sharp curves or involve incompatible uses. Further, the proposed realignment of Bellwood Avenue would be subject to review and approval of the City Department of Building and Safety, LADOT, and Bureau of Engineering to ensure adequate design. Additionally, the driveways and vehicular motor court for the Project would be placed along the realigned portion of Bellwood Avenue and would be designed and located at a distance from Olympic Boulevard to limit queue spillovers into the public right-of-way and interruptions to pedestrian flow and safety. Therefore, the Project's motor court and driveways would not substantially increase vehicle-vehicle conflicts and would not present any geometric design hazards as it related to traffic movement. The driveway design would not restrict sight

Table IV.I-2
Project Trip Generation Estimates^a

Land Use	Size	A.M. Peak Hour			P.M. Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Project							
Independent Living	71 du	3	2	5	7	6	13
Assisted Living ^b	99 beds	12	7	19	10	16	26
Memory Care ^c	46 beds	6	3	9	5	7	12
Subtotal Proposed Project Trips^d		21	12	33	22	29	51
Existing Uses to Be Removed							
Multi-family Housing (low-rise)	112 du	12	40	52	40	23	63
<i>Less Walk-in/Transit Reduction (5%)^e</i>		-1	-2	-3	-2	-1	-3
Subtotal Existing Trips		11	38	49	38	22	60
Total Net New Trips		10	(26)	(16)	(16)	7	(9)

^a The number of trips was estimated using rates published in the Institute of Transportation Engineers' Trip Generation, 10th Edition manual. These rates are based on surveys of similar land uses at sites around the county and are used to calculate the number of vehicle trips traveling to and from the Project Site based on the size of each land use component.

^b The 75 assisted living guestrooms include 51 one-bedroom units and 24 two-bedroom units.

^c The 46 memory care guestrooms consist only of studio units.

^d No transit/walk-in reduction has been applied to the proposed Project.

^e Per LADOT's Transportation Impact Study Guidelines, the Project Site is located within a 0.25-mile walking distance from a local bus stop. Therefore, a transit/walk-in reduction is applied to the existing uses to account for transit usage and walking visitor arrivals from the adjacent commercial developments.

Source: Gibson Transportation Consulting, Inc., 2020.

lines, allowing drivers to safely identify approaching vehicles, pedestrians, and bicyclists before committing to turn. **Thus, the Project would not result in a substantial increase in hazards due to a geometric design feature or incompatible use.** As determined in the Initial Study, impacts with respect to Threshold (c) would be less than significant. No further analysis is required.

Threshold (d): Would the Project result in inadequate emergency access?

(1) Impact Analysis

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, the Project would involve the vacation and realignment of Bellwood Avenue and may require infrastructure improvements or upgrades that could temporarily necessitate lane closures on nearby roadways.

According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Olympic Boulevard, which is approximately 70 feet north of the Project Site and provides arterial access to the Project Site and surrounding uses.

Typical construction activity would occur between 7:00 A.M. and 9:00 P.M. on weekdays in accordance with LAMC Section 41.40. Peak truck activity would occur during construction of the mat foundation, which would occur as part of the initial building stages, and peak worker activity would occur during finishes/coating, which occurs at the end of the construction process. Up to 200 concrete truck roundtrips (400 one-way trips) are forecast to occur during the mat foundation period¹⁴ (The mat foundation period is anticipated to occur over approximately 1 to 3 days). Up to 81 daily haul truck roundtrips (162 one way trips) and 5 daily delivery truck roundtrips (10 one way trips) would occur during the grading and excavation period, totaling 86 daily truck roundtrips (172 one way trips).

Haul trucks would travel on approved truck routes between the Project Site and the San Diego Freeway (I-405) or the Santa Monica Freeway (I-10). Incoming trucks from the I-405 Freeway would exit the I-405 Freeway at Olympic Boulevard, heading north on Sawtelle Boulevard, and east on Olympic Boulevard, and turn right on Bellwood Avenue to the Project Site. Outgoing trucks to the I-405 Freeway would exit the Project Site onto Bellwood Avenue, head east on Olympic Boulevard, south on Century Park East, west on Pico Boulevard, north on Cotner Avenue to the I-405 northbound on-ramp. Incoming trucks from the I-10 Freeway would exit the I-10 Freeway at Overland Avenue, heading north on Overland Avenue, head east on Olympic Boulevard, and turn right on Bellwood Avenue to the Project Site. Outgoing trucks to the I-10 Freeway would exit the Project Site onto Bellwood Avenue, head east on Olympic Boulevard, south on Century Park East, east on Pico Boulevard, and south on La Cienega Boulevard to the I-10 east bound on-ramp.

Based on regionally accepted standards, a passenger car equivalency (PCE) of 2.0 was applied to equate larger trucks to passenger vehicles during the peak hours.¹⁵ The maximum 13 hourly concrete truck and haul truck roundtrips would be equivalent to 26 PCE roundtrips (52 one-way trips). In accordance with Project Design Feature PDF TR-PDF-1, concrete, haul, and delivery trucks would generally operate outside of the peak

¹⁴ Based on input from the Project Applicant, a maximum of 13 haul truck and concrete truck roundtrips can be accommodated at the Project Site within a given hour. As such, the 200 estimated daily concrete truck roundtrips over an approximate 12-hour period is conservative and overstated.

¹⁵ Transportation Research Circular No. 212 (Transportation Research Board, 1980) defines PCE for a vehicle as the number of through moving passenger cars to which it is equivalent based on the vehicle's headway and delay-creating effects. Table 8 of the Transportation Research Circular No. 212 and Exhibit 16.7 of the 2000 Highway Capacity Manual (Transportation Research Board, 2000) suggest a PCE of 2.0 for trucks.

hours and temporary traffic controls would be used to ensure adequate traffic flow on public roadways (e.g., flag men, signage, etc.). Therefore, concrete, haul, and delivery trucks would not impede emergency access in the Project vicinity.

Construction worker traffic would depend on the number of construction workers employed during various construction phases, as well as the mode and time of travel of the workers. According to construction projections prepared for the Project, a maximum of 200 trips by workers could be generated daily to the construction site during the finishes/coating phase. The hours of construction typically require workers to be on-site before the A.M. commuter peak period of 7:00 to 9:00 A.M. and allow them to leave before or after the P.M. peak period of 3:00 to 6:00 P.M.. Therefore, most, if not all, of the construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods. As such, construction worker traffic would not result in substantial traffic that might affect traffic flow and emergency access. In addition, during construction, restrictions on construction worker parking on public right-of-way in the vicinity of (or adjacent to) the Project Site would be identified as part of the Construction Management Plan, as described above in Project Design Feature TR-PDF-1. Furthermore, the Construction Management Plan would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

As part of the construction management plan, construction activities associated with the new building and on-site improvements would take place within the Project Site. However, the Project may require infrastructure improvements or upgrades that could temporarily necessitate lane closures in nearby roadways. The Project's Construction Management Plan would require approval from LADOT prior to the start of demolition or construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and to ensure traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster route along Olympic Boulevard.

With regards to operation, as described in Section II, Project Description, of this Draft EIR, existing vehicular access to the Project Site would be maintained and would be provided via Bellwood Avenue from Olympic Boulevard. While the portion of Bellwood Avenue that bisects the Project Site would be vacated and realigned, continuous public access through Bellwood Avenue would be maintained, and emergency access to the Project Site and surrounding area would continue to be provided. Additionally, the proposed realignment would comply with the City's applicable requirements, including emergency access requirements set forth by the Los Angeles Department of Building and Safety and LAFD. The Project's driveways and internal circulation would be designed to

meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project.

Based on the above the Project would not result in inadequate emergency access during construction and operation of the Project. As such, impacts to emergency access would be less than significant.

(2) Mitigation Measures

Project-level impacts related to emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) *Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System*

As discussed above, the Project would not result in an increase in the use of transit when compared with existing conditions and would not generate an increase in daily vehicle trips when compared with existing conditions. In addition, the Project would develop new housing in a HQTA as encouraged by SCAG's 2016–2020 and 2020–2045 RTP/SCS. Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, Project impacts would be less than significant. Similar to the Project, the related projects would be required to provide adequate pedestrian access and provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21-A,16(a).

Furthermore, driveway access would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. **Thus, cumulative impacts with regard to conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant. The Project's impacts would not be cumulatively considerable, and cumulative impacts would not occur.**

(b) Vehicle Miles Traveled

As discussed in Section 2.2.4 of the Traffic Assessment Guidelines, projects that are consistent with SCAG's 2016–2020 and 2020–2045 RTP/SCS are considered to have a less than significant cumulative impact on VMT. Further, projects that do not have a project impact based on an efficiency-based impact threshold (VMT per capita or VMT per employee) in the project analysis are considered to not have a cumulative VMT impact. As discussed in detail in Section IV.F, Greenhouse Gas Emissions, and Section IV.G, Land Use, of this Draft EIR, the Project would be consistent with the 2016–2040 RTP/SCS. As described above, the Project would not result in a VMT impact, and would therefore align with the long-term VMT and GHG goals of the SCAG RTP/SCS. Furthermore, the Project would develop new housing in a HQTA as encouraged by SCAG's 2016–2020 and 2020–2045 RTP/SCS. **As the Project's VMT impacts would not be cumulatively considerable, cumulative VMT impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

(c) Hazardous Geometric Design Features

As discussed above, through public access would be maintained from both sides of Bellwood Avenue through the Project Site, and the existing intersections of Bellwood Avenue and Olympic Boulevard would not be affected by the proposed realignment of Bellwood Avenue as part of the Project. In addition, the proposed realignment would not introduce any sharp curves or involve incompatible uses. Moreover, the final design of the realignment would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure adequate design. Further, the design and implementation of new driveways associated with the Project would comply with the City's applicable requirements, including emergency access requirements set forth by LADBS and LAFD. The design of related projects would also be reviewed by the LADBS, BOE and the LAFD, as applicable, during the City's plan review process to ensure all applicable requirements are met. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

(d) *Emergency Access*

As analyzed above, construction and operation of the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Moreover, in accordance with regulatory requirements, the related projects would implement measures to ensure adequate flow of vehicles and access during construction. Like the Project, operation of the related projects would also be anticipated to provide for safe and efficient circulation including adequate sight distances and implementation of multi-modal transportation strategies to facilitate the dispersal of traffic. Also, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Furthermore, since modifications to access and circulation plans are largely confined to a project site , a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to emergency access would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric design features; and inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.