IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section of this Draft EIR analyzes the Project's potential impacts on transportation. This section is based on the *Transportation Impact Study: Our Lady of Mt. Lebanon Project* (Transportation Study) dated April 2019 and the *Traffic Analysis Addendum for the Our Lady of Mt. Lebanon Project* (Transportation Addendum) dated February 27, 2020, both prepared by Linscott, Law, & Greenspan Engineers and included as Appendices S and T to this Draft EIR, respectively.

The analysis of vehicle miles traveled (VMT) and alley impacts are based on the Transportation Addendum. The analysis of the Project's potential VMT impacts in the Transportation Addendum was prepared pursuant to LADOT's July 2019 *Transportation Assessment Guidelines* (TAG)[1], which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Addendum was approved by LADOT on April 27, 2020, and the approval is included as Appendix T to this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include:

- Americans with Disabilities Act of 1990 (ADA)

[1] *An update to the TAG was released in July 2020. However, the Project's Transportation Addendum was approved prior to its release and is based on the July 2019 TAG. The July 2020 TAG is largely similar to the July 2019 TAG.*

- Complete Streets Act
- Assembly Bill (AB) 32 and Senate Bill (SB) 375
- California Vehicle Code (CVC)
- SB 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- City of Los Angeles Mobility Plan 2035
- Wilshire Community Plan
- Los Angeles Municipal Code (LAMC)
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures (MPP) Section 321
- Vision Zero
- Citywide Design Guidelines

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

(a) Complete Streets Act

Assembly Bill 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

(b) Assembly Bill 32 and Senate Bill 375

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of SB 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

(c) California Vehicle Code

The CVC provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council 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* (adopted in July 2019 and updated in July 2020), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.[2]

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. 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 vehicle miles traveled 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 further below, LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to estimate project-specific daily household VMT per

[2] *An update to the TAG was released in July 2020. However, the Transportation Addendum for the Project was approved prior to its release and is based on the July 2019 TAG. The July 2020 TAG is largely similar to the July 2019 TAG.*

capita and daily work VMT per employee for developments within City limits.[3] The methodology in determining VMT based on the VMT Calculator is consistent with Section 15064.3 and the TAG.

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

On 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, SB 375 requires SCAG and other Metropolitan Planning Organizations 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.[4] Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), 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. HQTAs 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.[5] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[6] The Project Site is located within an HQTA as designated by the 2016–2040 RTP/SCS.[7,8] Refer to Appendix N to this Draft EIR for a detailed discussion of the relevant provisions of the 2016–2040 RTP/SCS that apply to the Project.

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[3] *LADOT VMT Calculator 1.3 was released in May 2020. However, the Transportation Addendum for the Project was approved prior to its release and used VMT Calculator 1.2. The July 2020 TAG is largely similar to the July 2019 TAG.*

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

[5] *SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 189.*

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

[7] *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.*

[8] *Los Angeles County Metropolitan Transportation Authority (Metro). "High Quality Transit Areas—Southwest Quadrant."*

On September 3, 2020, SCAG's Regional Council adopted its 2020–2045 RTP/SCS, Connect SoCal. Connect SoCal's core vision is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to reach our region's GHG reduction goals. As was the case under the prior RTP/SCS, the Project Site is located within an HQTA as designated by the 2020–2045 RTP/SCS.[9,10]

As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on August 9, 2019, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[11] 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.

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[9] *SCAG, Connect SoCal, The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, adopted September 3, 2020.*

[10] *Los Angeles County Metropolitan Transportation Authority (Metro), High Quality Transit Areas—Southwest Quadrant map.*

[11] *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.*

Each of the goals contains objectives and policies to support the achievement of those goals.

Street classifications are designated in the Mobility Plan, and may be amended by a Community Plan, and are intended 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, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
  - Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- 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.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
  - Continuous local streets that connect to other streets at both ends, and/or
  - Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network, Transit Enhanced Network, Vehicle Enhanced Network, and Neighborhood Enhanced Network. In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts.

(b) Wilshire Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans

establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project Site is located within the Wilshire Community Plan area. The Wilshire Community Plan includes numerous objectives and policies intended to improve the pedestrian realm, promote bicycle use, increase the use of public transit, and promote Transportation Demand Management (TDM) Strategies.

(c) Los Angeles Municipal Code

With regard to construction traffic, Los Angeles Municipal Code (LAMC) Section 41.40 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.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

With regard to on-site bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for long-term and short-term bicycle parking for residential and commercial buildings. Where there is a combination of uses on a lot, the number of bicycle parking spaces required shall be the sum of the requirements of the various uses. LAMC Section 12.21 A.16 also includes facility requirements, design standards and siting requirements for bicycle parking.

LAMC Section 12.26 J provides for TDM and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential

gross floor area described above, and include measures such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

(d) LADOT Transportation Assessment Guidelines

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on vehicle miles traveled, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020.[12] The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[13]

(e) LADOT Manual of Policies and Procedures Section 321

LADOT MPP Section 321 provides the basic criteria for the review of driveway design. As discussed in MPP Section 321, the basic principle of driveway location planning is to minimize potential conflicts between users of the parking facility and users of the abutting street system, including the safety of pedestrians.

(f) Vision Zero

The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury

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[12] *As noted above, the Project's Transportation Addendum was approved prior to the release of the July 2020 and is based on the July 2019 TAG. The July 2020 TAG is largely similar to the July 2019 TAG.*

[13] *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, July 2020.*

Network, which has a higher incidence of severe and fatal collisions. The High Injury Network, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

(g) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework'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 General Plan Framework 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.

b. Existing Street Systems

The existing street system in the study area, the boundaries of which are described above, consists of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access. The existing street system and transit network is shown in Figure IV.I-1 on page IV.I-12.

(1) Freeways

Primary regional access to the Project Site is provided by I-10 or Santa Monica Freeway, which generally runs in an east-west direction that extends across Southern California. In the vicinity of the Project Site, four mixed-free flow freeway lanes are provided on I-10 Freeway. Eastbound and westbound ramps are provided on I-10 at Robertson Boulevard and La Cienega Boulevard, approximately 3 miles south of the Project Site.

(2) Streets

The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain hazardous geometric design features such as sharp curves or dangerous intersections. Listed below are the primary streets that provide regional and local access to the Project Site:

- Robertson Boulevard—Robertson Boulevard is a north-south oriented roadway located west of the Project Site. Within the Project study area, Robertson Boulevard is designated as an Avenue II by the City of Los Angeles and as a Minor Arterial by the City of Beverly Hills. One through travel lane is provided in each direction on Robertson Boulevard north of Burton Way within the Project study area. Within the study area, two through travel lanes are provided on

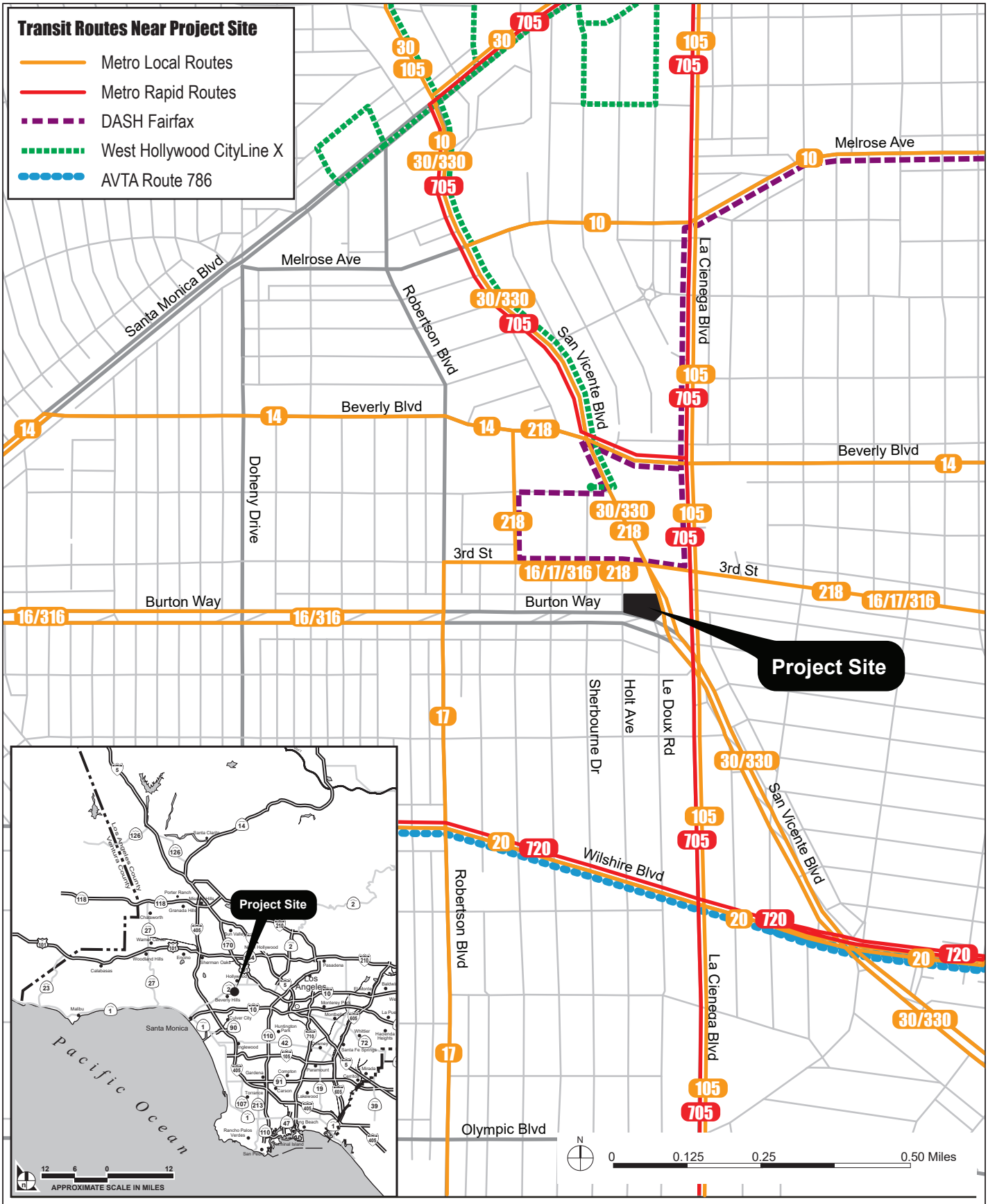

Figure IV.I-1
Existing Street System and Transit Network

Source: Los Angeles County GIS, 2015; Eyestone Environmental, 2020.

southbound Robertson Boulevard south of Burton Way. In the northbound direction, two through travel lanes are provided on Robertson Boulevard south of Clifton Way. Separate exclusive left-turn lanes are provided on Robertson Boulevard at major intersections. North of Burton Way, Robertson Boulevard is posted for a speed limit of 30 miles per hour. South of Burton Way, Robertson Boulevard has a posted speed limit of 25 miles per hour (mph).

- San Vicente Boulevard—San Vicente Boulevard is a north-south oriented roadway that borders the Project Site on the east. Within the study area, San Vicente Boulevard is designated as a Boulevard II by the City of Los Angeles, as a Principal Arterial by the City of Beverly Hills, and as an Arterial by the City of West Hollywood. North of Burton Way, two through travel lanes are provided in each direction on San Vicente Boulevard within the study area. South of Burton Way, three through travel lanes are provided in each direction on San Vicente Boulevard within the study area. Separate exclusive left-turn lanes are provided on San Vicente Boulevard at major intersections. San Vicente Boulevard has a posted speed limit of 35 mph within the study area.

- Willaman Drive—Willaman Drive is a north-south oriented roadway located west of the Project Site. Within the Project study area, Willaman Drive is designated as a Local Street by the City of Los Angeles. One through travel lane is provided in each direction on Willaman Drive within the study area. There is no speed limit posted on Willaman Drive within the study area, thus a speed limit of 25 mph is assumed, consistent with the California Vehicle Code (CVC).

- Sherbourne Drive—Sherbourne Drive is a north-south oriented roadway located west of the Project Site. Within the study area, Sherbourne Drive is designated as a Local Street by the City of Los Angeles. One through travel lane is provided in each direction on Sherbourne Drive within the study area. There is no speed limit posted on Sherbourne Drive within the study area, thus a speed limit of 25 mph is assumed, consistent with the CVC.

- Holt Avenue—Holt Avenue is a north-south oriented roadway that borders the Project Site on the west. Within the study area, Holt Avenue is designated as a Local Street by the City of Los Angeles. One through travel lane is provided in each direction on Holt Avenue within the study area. There is no speed limit posted on Holt Avenue within the study area, thus a speed limit of 25 mph is assumed, consistent with the CVC.

- Le Doux Road—Le Doux Road is a north-south oriented roadway located south of the Project Site. Within the study area, Le Doux Road is designated as a Local Street by the City of Los Angeles. One through travel lane is provided in each direction on Le Doux Road within the study area. There is no speed limit posted on Le Doux Road within the study area, thus a speed limit of 25 mph is assumed, consistent with the CVC.

- La Cienega Boulevard—La Cienega Boulevard is a north-south oriented roadway located east of the Project Site. Within the study area, La Cienega Boulevard is designated as an Avenue I by the City of Los Angeles and as a Principal Arterial by the City of Beverly Hills. North of Melrose Avenue, La Cienega Boulevard is designated as a Collector by the City of West Hollywood within the study area. South of Melrose Avenue, La Cienega Boulevard is designated as an Arterial by the City of West Hollywood within the study area. North of Beverly Boulevard, two through travel lanes are provided on La Cienega Boulevard in each direction. South of Beverly Boulevard, three through travel lanes are provided in each direction. Separate exclusive left-turn lanes are provided on La Cienega Boulevard at major intersections. La Cienega Boulevard has a posted speed limit of 35 mph within the study area.

- 3rd Street—3rd Street is an east-west oriented roadway located north of the Project Site. Within the study area, 3rd Street is designated as an Avenue II by the City of Los Angeles. Two through travel lanes are provided in each direction on 3rd Street within the study area. Separate exclusive left-turn lanes are provided on 3rd Street at major intersections. 3rd Street has a posted speed limit of 35 mph within the study area.

- Burton Way—Burton Way is an east-west oriented roadway that borders the Project Site on the south. Within the study area, Burton Way is designated as an Avenue II by the City of Los Angeles and as a Principal Arterial by the City of Beverly Hills. Three through travel lanes are provided in each direction on Burton Way within the study area. Separate exclusive left-turn lanes are provided on Burton Way at major intersections. Burton Way has a posted speed limit of 35 mph within the Project study area.

- Wilshire Boulevard—Wilshire Boulevard is an east-west oriented roadway located south of the Project Site. Within the study area, Wilshire Boulevard is designated as an Avenue I by the City of Los Angeles and as a Principal Arterial by the City of Beverly Hills. Generally, three though travel lanes are provided in each direction on Wilshire Boulevard within the study area. Separate exclusive left-turn lanes are provided on Wilshire Boulevard at major intersections. Wilshire Boulevard has a posted speed limit of 35 mph within the study area.

- Melrose Avenue—Melrose Avenue is an east-west oriented roadway located north of the Project Site. Within the study area, Melrose Avenue is designated as an Avenue II by the City of Los Angeles and as a Collector by the City of West Hollywood. East of San Vicente Boulevard, two through travel lanes are provided in both directions on Melrose Avenue. West of San Vicente Boulevard, two through travel lanes are provided in the eastbound direction on Melrose Avenue, and one through travel lane is provided in the westbound direction on Melrose Avenue. East of Knoll Drive, two through travel lanes are provided in each direction on Melrose Avenue. Separate exclusive left-turn lanes are provided on Melrose Avenue at the major intersections. Melrose Avenue has a posted speed limit of 35 mph within the study area.

- Beverly Boulevard—Beverly Boulevard is an east-west oriented roadway located north of the Project Site. Within the study area, Beverly Boulevard is designated as an Avenue I by the City of Los Angeles and as an Arterial by the City of West Hollywood. Two through travel lanes are generally provided in both directions on Beverly Boulevard within the study area. Separate exclusive left-turn lanes are provided on Beverly Boulevard at major intersections. Beverly Boulevard has a posted speed limit of 35 mph within the study area.

(3) Regional Transportation System

(i) Freeways

As discussed above, primary regional access to the Project Site is provided by I-10 or Santa Monica Freeway, which generally runs in an east-west direction that extends across Southern California. In the vicinity of the Project Site, four mixed-free flow freeway lanes are provided on I-10. Eastbound and westbound ramps are provided on I-10 at Robertson Boulevard and La Cienega Boulevard, approximately 3 miles south of the Project Site.

(ii) Transit System

Public transit service within the study area is currently provided by Metro, LADOT DASH, City of West Hollywood CityLine, and the Antelope Valley Transit Authority (AVTA). Existing transit service in the study area is shown in Figure IV.I-1 on page IV.I-12. The following list presents a brief description of the 13 bus lines providing service in the vicinity of the Project Site. For additional information on the transit lines operating in the study area, including frequency of service, refer to Table 4-1 of the Transportation Study.

- Metro 10—Route 10 is a local line that travels from Downtown Los Angeles to West Hollywood via Temple Street and Melrose Avenue.

- Metro 14—Route 14 is a local line that travels from Downtown Los Angeles to Beverly Hills via Beverly Boulevard.

- Metro 16/17/316—Route 16/17/316 is a local line that travels from Downtown Los Angeles to Century City/Culver City Expo Station via 3rd Street and Robertson Boulevard.

- Metro 20—Route 20 is a local line that travels from Downtown Los Angeles to Santa Monica via Wilshire Boulevard.

- Metro 30/330—Route 30/330 is a local line that travels from East Los Angeles to West Hollywood via San Vicente Boulevard, Pico Boulevard, and East 1st Street.

- Metro 105—Route 105 is a local line that travels from Vernon to West Hollywood via La Cienega Boulevard and Vernon Avenue.

- Metro 218—Route 218 is a local line that travels from Studio City to Beverly Hills via Laurel Canyon Boulevard.

- Metro Rapid 705—Route 705 is a rapid line that travels from West Hollywood to Vernon via La Cienega Boulevard and Vernon Avenue.

- Metro Rapid 720—Route 720 is a rapid line that travels from Commerce to Santa Monica via Wilshire Boulevard and Whittier Boulevard.

- LADOT DASH Fairfax—Dash Fairfax is a local line that travels from Cedars-Sinai Medical Center to Park La Brea via La Cienega Boulevard, Melrose Avenue, and Wilshire Boulevard.

- West Hollywood CityLine—West Hollywood CityLine is a local line that travels from Cedars-Sinai Medical Center to La Brea via San Vicente and Santa Monica Boulevard.

- West Hollywood CityLine X—West Hollywood CityLine X is a commuter line that travels from Cedars-Sinai Medical Center to La Brea via San Vicente Boulevard and Santa Monica Boulevard.

- AVTA 786—AVTA 786 is a local line that travels from Century City/West Los Angeles to Lancaster via Santa Monica Boulevard and Wilshire Boulevard.

c. Existing Project Site Conditions

The Project Site is presently occupied by four buildings and a surface parking lot. Vehicular access to the Project Site is currently provided by the adjacent alleyway located north of the Project Site and two driveways along the Burton Way frontage.

d. Existing Bicycle and Pedestrian Facilities

(1) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the existing bicycle system in the study area consists of bicycle paths (Class I), bicycle lanes (Class II), and bicycle routes (Class III). Bicycle paths (Class I) are exclusive car free facilities that are typically not located within roadway areas. Bicycle paths are located within or adjacent to river corridors, transit corridors, or the coast. Bicycle lanes (Class II) 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. Bicycle routes and bicycle-friendly streets (Class III) are those where motorists and cyclists share the roadway and there is no

dedicated striping of a bicycle lane. Bicycle routes and bicycle-friendly streets are preferably located on collector and lower volume arterial streets. Bicycle routes with shared lane markings, or "sharrows," make motorists aware of bicycles potentially in the travel lane, and show bicyclists the correct direction of travel. In the vicinity of the Project Site, bicycle lanes have been implemented along Burton Way and San Vicente Boulevard between Beverly Boulevard and La Cienega Boulevard.

(2) Pedestrian Facilities

The area surrounding the Project Site includes a mature network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks also provide connectivity to pedestrian crossings at intersections within the study area.

The walkability of a location is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. These attributes are quantified by WalkScore.com and assigned a score out of 100 points. With the various commercial businesses and parks in the community, the walkability of the study area is approximately 93 points.[14]

e. Future Transportation Context

(1) Related Projects

The traffic analysis for the Project considered the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects in the vicinity of the Project Site that could affect traffic conditions near the Project Site is based on information on file at the City of Los Angeles Department of City Planning, LADOT, the City of Beverly Hills Community Development Department, and the City of West Hollywood Community Development Department. A total of 44 related projects were identified in the vicinity of the Project Site, as shown in Table III-1 in Section III, Environmental Setting, of this Draft EIR. The locations of the related projects are shown in Figure III-1. While the buildout years of many of these related projects are uncertain and may be well beyond the buildout year of the Project or may never be approved or developed, all related projects were conservatively considered as part of the Project traffic analysis and assumed to be completed by the

[14] *WalkScore.com (www.walkscore.com) rates the Project Site with a score of 93 of 100 possible points (scores accessed on June 11, 2019). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.*

Project buildout year of 2024. Therefore, the projected traffic growth as a result of the related projects is a conservative estimate.

(2) Future Base Transportation System Improvements

(a) City Bicycle Plan

The 2010 Bicycle Plan identifies designated bicycle facilities planned for implementation. Specifically, in the vicinity of the Project Site, bicycle lanes have been implemented along Burton Way and San Vicente Boulevard between Beverly Boulevard and La Cienega Boulevard. Bicycle lanes are also proposed along 3rd Street east of San Vicente Boulevard. In addition, bicycle-friendly streets are proposed on 3rd Street west of San Vicente Boulevard and Willaman Drive. As a current schedule for implementation of these bicycle lanes is not available, based on consultation with LADOT, no changes to vehicular lane configurations as a result of potential new bicycle lanes were assumed in this analysis.

(b) Mobility Plan 2035

In the Mobility Plan, the City identifies key corridors of mobility-enhanced networks. Specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. As such, there have been no changes to vehicular lane configurations as a result of the Mobility Plan. However, the following mobility-enhanced networks do include corridors in the vicinity of the Project Site:

- Transit Enhanced Network—3rd Street was identified as a Moderate Transit-Enhanced Network. La Cienega Boulevard was identified as a Moderate Plus Transit-Enhanced Street.

- Neighborhood Enhanced Network—The following corridors were identified as part of a Neighborhood Enhanced Network: 3rd Street west of San Vicente Boulevard and Willaman Drive north of Clifton Way.

- Bicycle Enhanced Network/Bicycle Lane Network—The following corridors were identified for Bicycle Lanes: Burton Way; San Vicente Boulevard between Beverly Boulevard and La Cienega Boulevard; and 3rd Street east of San Vicente Boulevard. Bicycle lanes have been installed on Burton Way and San Vicente Boulevard between Beverly Boulevard and La Cienega Boulevard.

- Vehicle Enhanced Network—No corridors within the immediate study area were identified as part of the Vehicle Enhanced Network. Further away from the Project Site, La Cienega Boulevard south of Olympic Boulevard and Olympic Boulevard east of Robertson Boulevard were identified as part of the Vehicle Enhanced Network.

- Pedestrian Enhanced District—The following corridors were identified as part of the Pedestrian Enhanced District: 3rd Street; Burton Way; San Vicente Boulevard; and La Cienega Boulevard north of Clifton Way.

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 if it would:

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

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

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.

As previously discussed, SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within transit priority areas. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." As noted above, on July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance on August 9, 2019. As also noted above, the provisions of SB 743 are now in effect.

This analysis employs the Appendix G significance thresholds described above. The methodology and base assumptions used in this analysis were established by LADOT.

b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G significance thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis discusses in detail the anticipated effect of the Project with respect to LOS. As described above, Appendix G 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. In accordance with the TAG, a project that generally conforms with and does not obstruct the City's development policies and standards is generally considered to be consistent with those policies and standards.

(2) Vehicle Miles Traveled

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA although CEQA allows lead agencies to set or apply their own significance thresholds. The TAG identify significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the State's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City 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 the TAG in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is

located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15 percent below the existing average work VMT per employee for the APC area in which it's located.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The TAG identify a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC, in which the project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 6.0 and average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.

(b) VMT Analysis Methodology

LADOT developed VMT Calculator Version 1.2 in November 2019 to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.[15] The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

(i) Travel Behavior Zone

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through transportation demand management (TDM) strategies. As detailed in City's VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network.

2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.

3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets.

4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

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[15] *LADOT VMT Calculator 1.3 was released in May 2020. However, the Transportation Addendum for the Project was approved prior to its release and used VMT Calculator 1.2.*

The VMT Calculator determines a Project's TBZ based on the latitude and longitude of the project address.

(ii) Mixed-Use Development Methodology

As detailed in City's VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for the Project area:

- The project's jobs/housing balance
- Land use density of the project
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size.

(iii) Travel Demand Forecasting

The VMT Calculator determines a Project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the project's VMT. It is noted that within the VMT Calculator, "church" is not one of the available land use types. Therefore, in accordance with the TAG, a custom VMT calculation has been prepared within the VMT Calculator for the church component of the Project.

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling

resources.[16] A summary of population and employment assumptions for various land uses is provided in Table 1 of the City's VMT Calculator Documentation.

(v) Transportation Demand Management Measures

The VMT Calculator also measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator:

1. Parking
2. Transit
3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement.

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in Quantifying Greenhouse Gas Mitigation Measures (California Air Pollution Control Officers Association, 2010).

(3) Hazardous Geometric Design Features

The TAG includes 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 (e.g., 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

[16] *The 2020 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.*

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

In consultation with LAFD, the analysis of the Project's potential access impacts includes a review of the proposed vehicle access points and internal circulation. A determination is made pursuant to the thresholds of significance identified above 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

The Project includes the following project design feature, which is relevant to the assessment of construction traffic impacts and impacts related to bicycle, pedestrian, and vehicular safety:

TR-PDF-1: Prior to the start of construction, the Applicant will prepare a Construction Traffic Management Plan (CTM Plan) that will include a Worksite Traffic Control Plan (WTC Plan), which will be submitted to the Los Angeles Department of Transportation (LADOT) for review and approval. The WTC Plan consists of a set of plans and will identify the location of any temporary street parking or sidewalk closures; show traffic/bus detours, haul routes, and hours of operation; provide for the posting of signs advising transit riders and pedestrians of temporary sidewalk closures and providing alternative routes; provide for the installation of other construction-related warning signs; and show access to abutting properties. In addition, the CTM Plan will include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction.
- Schedule construction material deliveries during off-peak periods to the extent practical.
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, to avoid an impact to the surrounding roadways.
- Coordinate truck activity and deliveries to minimize trucks waiting to unload or load at or adjacent to the Project Site, to the extent feasible, and impact roadway traffic.
- Control truck and vehicle access to the Project Site with a flagman.

- Implement the approved haul truck route program that specifies the construction truck routes to and from the Project Site.
- Limit sidewalk and lane closures to the extent practical, and avoid peak hours to the extent practical. Where such closures are necessary, the WTC Plan will identify the location of any temporary sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The WTC Plan will specifically state that signs will be posted advising pedestrians of temporary sidewalk closures and provide an alternative route or routes (e.g., if the sidewalk on the west side of San Vicente Boulevard adjacent to the Project Site is temporarily closed, a sign or signs would direct pedestrians to use the sidewalk on the east side of San Vicente Boulevard as an alternative route).
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Several other TDM program elements are already included in the Project design or will be achieved through regulatory compliance. These elements, which would enhance usage of walking, biking, and transit modes as alternatives to the automobile, include the following:

- Include Bike Parking per LAMC—Table 12.21 A.16(a)(1)(i) of the LAMC provides the required short-term and long-term bicycle parking spaces for the residential component of the Project, and Table 12.21 A.16(a)(2) of the LAMC provides the required short-term and long-term bicycle parking spaces for the non-residential component of the Project. Based on the LAMC, the Project is required to provide 10 short-term and 101 long-term bicycle parking spaces for the residential component. For the church component, the Project is required to provide nine short-term spaces and four long-term bicycle parking spaces. As a project feature, the Project will provide the required number of short-term and long-term bicycle parking spaces for the residential and church components. As shown in Appendix C to the Transportation Addendum, the Project receives a 0.625-percent VMT reduction for providing bike parking per the LAMC.

- Pedestrian Network Improvements—This strategy involves implementation of pedestrian network improvements throughout and around the Project Site that encourage people to walk. This includes internally linking all uses within the Project Site with pedestrian facilities such as sidewalks and connecting the Project Site to the surrounding pedestrian network. The Project includes pedestrian access points directly to sidewalks on the adjacent streets, including San Vicente Boulevard and Burton Way, as well as to the alley that borders the Project Site to the north. In addition, the Project includes the improvement of existing sidewalks or the construction of new sidewalks on the streets adjacent to

the Project Site, including Holt Avenue. As shown in Appendix C to the Transportation Addendum, the Project receives a 2.0 percent VMT reduction for providing pedestrian network improvements.

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

Table 2.1-2 in the TAG includes screening questions to determine which plans, policies, and programs apply to a project. The following questions apply to the Project: LAMC Section 12.37; Mobility Plan Policies 2.3 through 2.7, 2.10, 2.17, and 3.9; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan Programs ENG.9, PL.1, PL.13, PK.1, PK.7, PK.10, and PS.3; Transit Oriented Community Guidelines; Citywide Design Guideline 2;[17] and MPP Section 321. The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

(a) Los Angeles Municipal Code Section 12.37

As noted above, LAMC Section 12.37 pertains to development or expansion of buildings along highways and collector streets. Per Table 2.1-2 of the TAG, LAMC Section 12.37 also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. San Vicente Boulevard is a designated Boulevard II and Burton Way is a designated Avenue II in the Mobility Plan. Per the Mobility Plan, San Vicente Boulevard adjacent to the Project Site requires a 40-foot half-width roadway within a 55-foot half-width right-of-way and Burton Way adjacent to the Project Site requires a 28-foot half-width roadway within a 43-foot half-width right-of-way. While Burton Way meets width requirements, the width of San Vicente Boulevard varies between 35 and 37 feet. Therefore, a 3- to 5-foot widening of San Vicente Boulevard is required to meet the standard dimension in the Mobility Plan. Although no widening is proposed as part of the Project, a 3- to 5-foot dedication is included as part of the Project, which will allow the City to widen San Vicente Boulevard in the future if it chooses to do so. Therefore, the Project would not conflict with LAMC Section 12.37.

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[17] *Table 2.1-2 of the Transportation Assessment Guidelines specifically references Citywide Design Guidelines 4.1.01 and 4.1.02. However, the Citywide Design Guidelines were updated in October 2019 and these designations no longer apply. Guidelines 4.1.01 and 4.1.02 are now incorporated into Guideline 2.*

(b) Mobility Plan 2035

(i) Mobility Plan Policies

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: While this is a citywide policy, the Project would not conflict with its implementation. As part of the Project, existing access from the two driveways along Burton Way would be removed. All vehicular access for the Project Site would be provided by a driveway along the publicly-accessible alley that abuts the Project Site to the north. This would include vehicular access to the five-level subterranean parking structure, and access for freight vehicles into the loading area. In addition, there would be a passenger pick-up/drop-off area on Burton Way. Reducing the number of driveways would result in fewer interactions between vehicles and pedestrians, thereby enhancing pedestrian activity along surrounding sidewalks. In addition, the Project's close proximity to nearby retail, restaurants, shopping centers, and transit stops would facilitate pedestrian activities and reduce the need for vehicular trips. 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: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. 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: While this is a citywide policy, the Project would not conflict with its implementation. As discussed in the Transportation Addendum included as Appendix T to this Draft EIR, the Project is forecast to generate net new demand for 32 daily transit trips with two during the A.M. peak hour and three during the P.M. peak hour. Currently, the 13 public transit lines serving the Project Site provide an average of 338 buses during the A.M. peak hour and 334 buses during the P.M. peak hour. Therefore, the two and three net new peak-hour transit trips generated by the Project during the A.M. peak hour and P.M. peak hour, respectively, would correspond to an insignificant number of additional Project-generated transit trips per bus. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. As such, the Project's net increase in transit trips would be partially offset by anticipated improvements to transit service in the Project area. 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: While this is a citywide policy, the Project would not conflict with its implementation. As described above, in the vicinity of the Project Site, bicycle lanes have been implemented along Burton Way and along San Vicente Boulevard between Beverly Boulevard and La Cienega Boulevard. Bicycle lanes are also proposed along 3rd Street east of San Vicente Boulevard. In addition, bicycle-friendly streets are proposed on 3rd Street west of San Vicente Boulevard and Willaman Drive although there is no schedule for implementation of these planned facilities. Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. Bicycle parking requirements per LAMC Section 12.21 A.16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. In accordance with the requirements of LAMC Table 12.21 A.16(a)(2), the Project also includes 111 residential bicycle parking spaces (10 short-term and 101 long-term) and 13 church bicycle parking spaces (nine short-term and four long-term). 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 the adjacent streets are proposed as part of the Project. Primary regional access would continue to be provided by I-10, which is approximately 5 miles south of the Project Site. Access to and from I-10 is provided at La Cienega Boulevard. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: The Project includes access for freight vehicles to the on-site loading area from the publicly-accessible alley that abuts the Project Site to the north and would also include passenger loading areas to the Project Site on Burton Way. As such, delivery trucks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension: This is a citywide policy that does not apply directly to the Project, and the Project would not conflict with its implementation. As discussed above in the analysis for LAMC Section 12.37, in accordance with the Mobility Plan, San Vicente Boulevard adjacent to the Project Site requires a 40-foot half-width roadway and currently varies between 35 and 37 feet. Although no widening is proposed as part of the Project, the Project includes a 3- to 5-foot

dedication to allow for future widening if the City decides to do so. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.

Policy 3.9 Increased Network Access—Discourage the vacation of public rights-of-way: This is a citywide policy that does not apply to the Project because no vacation of public rights-of-way are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 3.9.

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

As discussed above in the analyses for Policy 2.3, 2.5, and 2.6, the Project would not conflict with Mobility Plan policies related to pedestrian, transit, and bicycle networks. 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

Mobility Plan Program ENG.9 directs the City to continue the Green Alleys program to introduce low-impact development stormwater features and improve the overall quality and safety of neighborhood alleys. While the Project does not propose alterations to the existing drainage in the alley abutting the Project Site to the north, within the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. With respect to alley safety, the proposed driveway along the alley would be designed in accordance with all applicable LADOT regulations which would ensure pedestrian safety. In addition, the Transportation Addendum included an analysis of traffic operations in the alley, as discussed in greater detail in Section 3.e, below. The analysis evaluated traffic operations in the alley during the weekday A.M. and P.M. peak hours (including arriving traffic related to an event at the church), as well as the peak hour of vehicle traffic exiting the Project following an event at the church. As detailed in Section 3.e, the Project would not materially change traffic operations on the alley, specifically as it relates to inbound and outbound traffic movements associated with the Westbury Terrace condominium building. Therefore, the Project would not conflict with Mobility Plan Program ENG.9.

Mobility Plan Program PK.7 requires off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings undergoing extensive renovations and/or expansion whenever practical in non-industrial areas. As discussed above in the analysis for Policy 2.10, the Project would provide access for freight vehicles to the on-site loading area via the publicly-accessible alley that abuts the Project Site to the north and would also include a passenger pick-up/drop-off area on Burton Way. Therefore, the Project would not conflict with Mobility Plan Program PK.7.

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 in the Initial Study included as Appendix A to this Draft EIR, the design and implementation of the new driveway 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 (LADBS) and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program 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 by a driveway along the publicly-accessible alley that abuts the Project Site to the north. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PL.13 is a citywide program to explore the use of special materials use within public rights-of-way. This program does not apply to the Project because no changes to the adjacent rights-of-way are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Program PL.13.

Mobility Plan Program PS.3 is a citywide program to explore the development of a connected network of walking passageways utilizing both public and private spaces, local streets, and alleyways to facilitate circulation. While this program is not applicable to the Project, as discussed above in the analysis of Policy 2.3, the Project would reduce the number of on-site driveways, resulting in fewer interactions between vehicles and pedestrians, thereby enhancing pedestrian activity along surrounding sidewalks. In addition, the Project's close proximity to nearby retail, restaurants, shopping centers, and transit stops would facilitate pedestrian activities and reduce the need for vehicular trips. Therefore, the Project would not conflict with Mobility Plan Program PS.3.

(c) Citywide Design Guidelines

The TAG requires analysis of Citywide Design Guideline 2 only. Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right-of-way; and on corner lots, orienting parking as far from the corner as possible. The Project would prioritize pedestrian access by providing multiple pedestrian access points on both San Vicente Boulevard and Burton Way, and a single driveway for vehicular access, which would be

located along the publicly-accessible alley that abuts the Project Site to the north. The Project would also improve continuity of the sidewalk by removing existing driveways on Burton Way. Therefore, the Project would not conflict with Citywide Design Guideline 2.

(e) LADOT Manual of Policies and Procedures Section 321

MPP Section 321 calls for the minimum number of driveways, consistent with street and lot capacity, located on streets with the least traffic volume when possible. As discussed above, the Project would remove two existing driveways along Burton Way and provide a single vehicular driveway along the publicly-accessible alley that abuts the Project Site to the north. In additionally, as discussed below with respect to Threshold (c), the Transportation Addendum concluded that the Project would not materially change traffic operations on the alley, specifically as it relates to inbound and outbound traffic movements associated with the Westbury Terrace residential development. Therefore, the Project would not conflict with MPP Section 321.

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

The Project would not conflict with the Plan for a Healthy Los Angeles, Wilshire Community Plan, LAMC Section 12.26J (TDM Ordinance), or the Mobility Hub Reader's Guide. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing near transit, as well as enhancing the pedestrian environment and providing bicycle parking. As discussed in detail in Section IV.F, Land Use, of and Appendix N, Land Use Tables, to this Draft EIR, the Project would not conflict with Wilshire Community Plan policies related to encouraging pedestrian activity and reducing VMT. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26 J, as well as Mobility Hub elements, such as bicycle parking and electric vehicle infrastructure. **Therefore, the Project would not conflict with these programs, plans, ordinances and policies.**

As discussed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

(2) Mitigation Measures

The Project's impact with respect to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

The Project's impact with respect to conflicts with plans were determined to be less than significant without mitigation.

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

(1) Impact Analysis

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's four land uses and their respective sizes as the primary input. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 345
- Total Employees: 6
- APC: Central
- TBZ: Urban
- Maximum VMT Reduction: 75 percent

Detailed output from the VMT Calculator is provided in the Transportation Addendum included as Appendix T to this Draft EIR. Based on the assumptions and the land uses utilized as the primary input in the VMT Calculator, it is estimated that the Project would generate 2,151 total household VMT and 17 total work VMT without any TDM measures. Thus, based on the population and employee assumptions above, the Project would generate an average household VMT per capita of 6.2 and an average work VMT per employee of 2.8[18] without any TDM measures. Therefore, the work VMT per employee of 2.8 would be below the significance threshold for the Central APC of 7.6 work VMT per employee, which is 15 percent below the existing average work VMT per employee. However, household VMT per capita of 6.2 would slightly exceed the significance threshold for the Central APC of 6.0 household VMT per capita. **Therefore, the Project's impact with respect to household VMT per capita would be significant and feasible mitigation would be required.**

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[18] *As discussed in the Traffic Addendum, "church" is not one of the available land use types within the VMT Calculator. Therefore, pursuant to the TAG, a custom VMT calculation was prepared within the VMT Calculator for the church component of the Project.*

(2) Mitigation Measures

Consistent with the VMT Calculator, the following mitigation measure is proposed to address household VMT per capita impacts:

Mitigation Measure TR-MM-1: Applicant shall prepare a TDM program for the Project that shall include the following TDM strategies consistent with Table 2.2-2 of the July 2019 Transportation Assessment Guidelines: Unbundle Parking and Promotions and Marketing. Specific elements are as follows:

- Unbundle Parking—At the time of initial opening of the development, at least $25.00 per month per parking space shall be charged for a residential unit, separate from the monthly cost to rent the residential unit.
- Promotions and Marketing—Marketing and promotional tools shall be utilized for the Project to educate and inform residents about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that residents can choose to read at their own leisure.

(3) Level of Significance After Mitigation

As shown in Appendix C to the Transportation Addendum, the Project receives a 3.0-percent VMT reduction for Unbundled Parking and a 4.0-percent VMT reduction for the use of promotions and marketing to encourage alternative transportation options. Accounting for the TDM program elements already included in the Project (i.e., code-required bicycle parking and pedestrian network improvements), and with implementation of Mitigation Measure TR-MM-1, the Project is expected to generate 580 daily vehicle trips, a total daily VMT of 3,312 miles, and household VMT per Capita of 5.8 miles and a Work VMT per Employee of 2.8 miles. Therefore, with implementation of Mitigation Measure TR-MM-1, household VMT per capita of 5.8 would be below the significance threshold for the Central APC of 6.0 household VMT per capita, and the Project's VMT impact would, therefore, be less than significant with this mitigation.

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 summarized in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study (Appendix A to this Draft EIR), the Project would not substantially increase hazards due to a design feature. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections, and the Project does not include any proposed modifications to the street system or any dangerous design features. The residential and religious uses proposed by the Project would be consistent with the surrounding uses near the Project Site and would not introduce any hazards onto or adjacent to the Project Site. The Project design would also be reviewed by LADBS and LADOT during the City's plan review process to ensure all applicable building design requirements are met.

Nevertheless, based on comments received during the NOP public review period, a supplemental analysis has been prepared to assess the Project's impact on the public alley that abuts the north side of the Project Site. This analysis is provided below.

(1) Alley Analysis

As described in the Transportation Study, vehicular access to the Project Site is proposed from the alley across from and near the vehicular access to the existing Westbury Terrace condominium building. This analysis has been prepared to evaluate traffic operations in the alley during the weekday A.M. commuter peak hour, the weekday P.M. commuter peak hour (including arriving traffic related to an event at the church), as well as the peak hour of vehicle traffic exiting the Project following an event at the church.

As discussed above, in accordance with SB 743, the City generally no longer uses LOS as a measure of transportation impacts under CEQA, in particular impacts to traffic intersections. However, given that (1) the VMT Calculator cannot be used to assess the Project's impact on alley operation and no methodology other than LOS exists to analyze such impact and (2) local residents expressed a specific concern regarding the Project's impact on alley operation, the alley analysis below uses LOS methodology.

(1) Existing Conditions

The Project Site is currently developed with the existing church facilities (the "Existing Church"). Vehicular access to the parking area serving the Existing Church is currently provide by two driveways along Burton Way and at two points along the public alley that abuts the north side of the Project Site. Access to the parking areas serving Westbury Terrace is provided by two driveways along the north side of the alley, across from the existing vehicular access points to the parking area serving the Existing Church. An aerial photo indicating the location of the vehicular access points to the Existing Church and Westbury Terrace is provided in Figure IV.I-2 on page IV.I-35.

Figure IV.I-2
Existing Driveway Locations

Source: Linscott, Law & Greenspan, engineers, 2019.

(2) Proposed Project

The Project includes 153 residential apartment units and 31,439 square feet of church floor area, as well as 397 vehicle parking spaces in a subterranean garage. The parking spaces will serve both the residential and church components of the Project.

Vehicular access to the Project parking garage will be provided by the alley in the general location of the access to the parking area serving the Existing Church. As shown on Figure IV.I-2 on page IV.I-35, the access to the proposed parking area will provide two lanes for inbound traffic and one lane for outbound traffic.

Upon completion of the Project, the Existing Church would resume normal operations, which include holding 25 to 30 events each year, consisting of weddings, funerals, and other church events. These events would primarily take place in the multi-purpose room, which would have a capacity of approximately 475 people. While the frequency of these events would remain the same, the size of some of these events would increase because the multi-purpose room would have a larger capacity than the existing social hall, which has a capacity of approximately 230 people. In addition, it is expected that six to eight community events would be held in the multi-purpose room each year.

While a majority of the larger events at the church/multi-purpose room are expected to occur on weekends, some events may occur on weekdays, primarily in the evening. For purposes of evaluating traffic movements within the alley related to Westbury Terrace, this alley analysis conservatively assumes an event at the church with 475 attendees occurring on a weekday evening, with peak pre-event traffic arriving during the weekday P.M. commuter peak hour ("Pre-Event") and peak post-event traffic departing later in the evening (e.g., in the 9:00–11:00 P.M. timeframe).

(3) Existing Traffic Volumes

Manual traffic counts of vehicular turning movements were conducted on Thursday, November 14, 2019, at each of the existing church and Westbury Terrace driveways along the alley during the weekday A.M. commuter peak period, the weekday P.M. commuter peak period (which would coincide with the assumed arrival of pre-event traffic for a church event), as well as during the evening hours that could coincide with vehicle traffic exiting the Project following an event at the church ("Post-Event"). Specifically, manual traffic counts of vehicles were conducted from 7:00 A.M. to 10:00 A.M., 3:00 P.M. to 6:00 P.M., and 9:00 P.M. to 11:00 P.M. The highest one-hour volume of traffic was determined at each location based on the data collected. The existing traffic volumes at the driveways during the weekday A.M. commuter peak hour, the Pre-Event peak hour (coinciding with the weekday P.M. commuter peak hour), and Post-Event peak hour are shown in Figure IV.I-3, Figure IV.I-4, and Figure IV.I-5 on pages IV.I-37, IV.I-38, and IV.I-39, respectively.

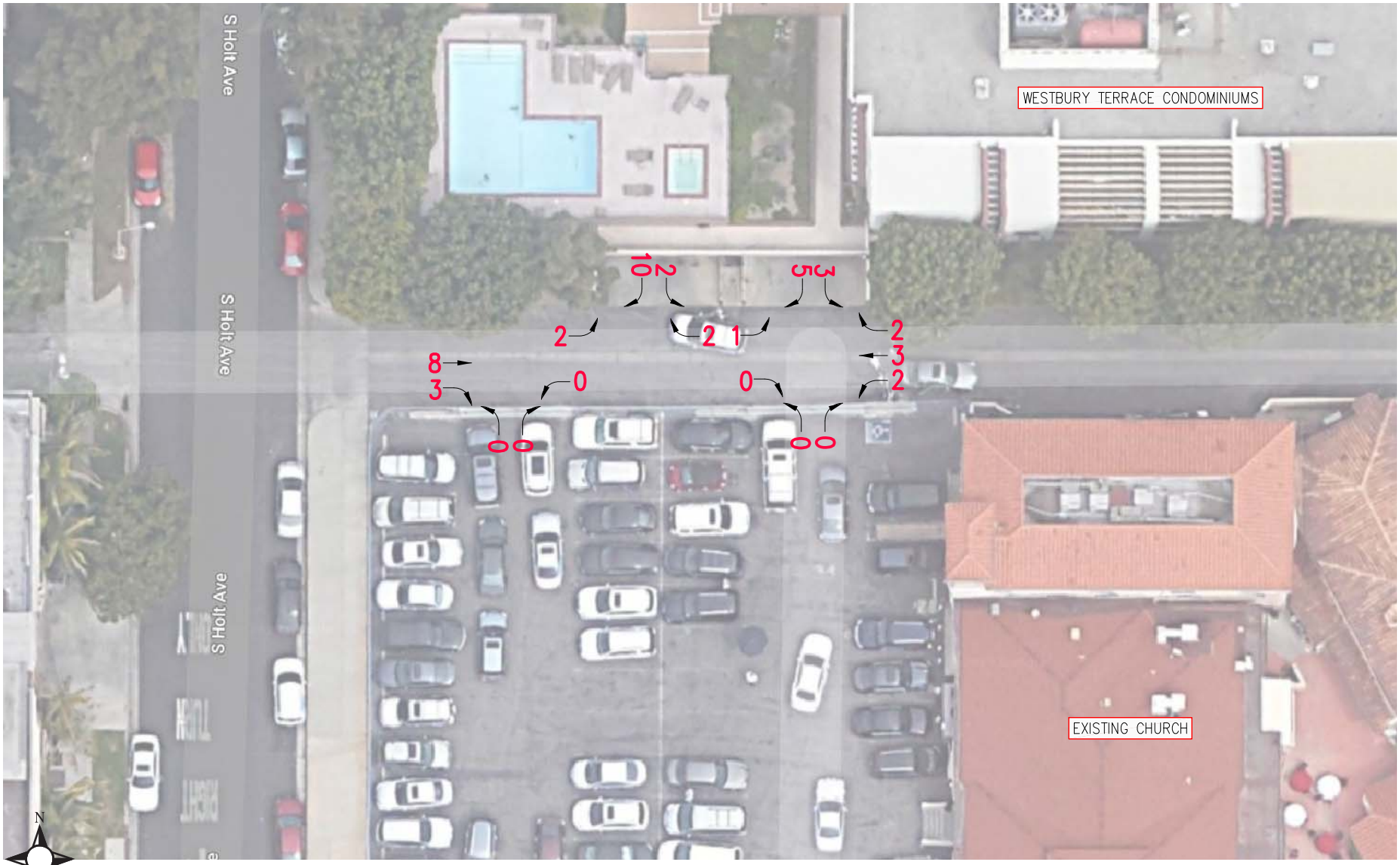

Figure IV.I-3

Existing Driveway Traffic Volumes – Weekday A.M. Peak Hour

Source: Linscott, Law & Greenspan, engineers, 2019.

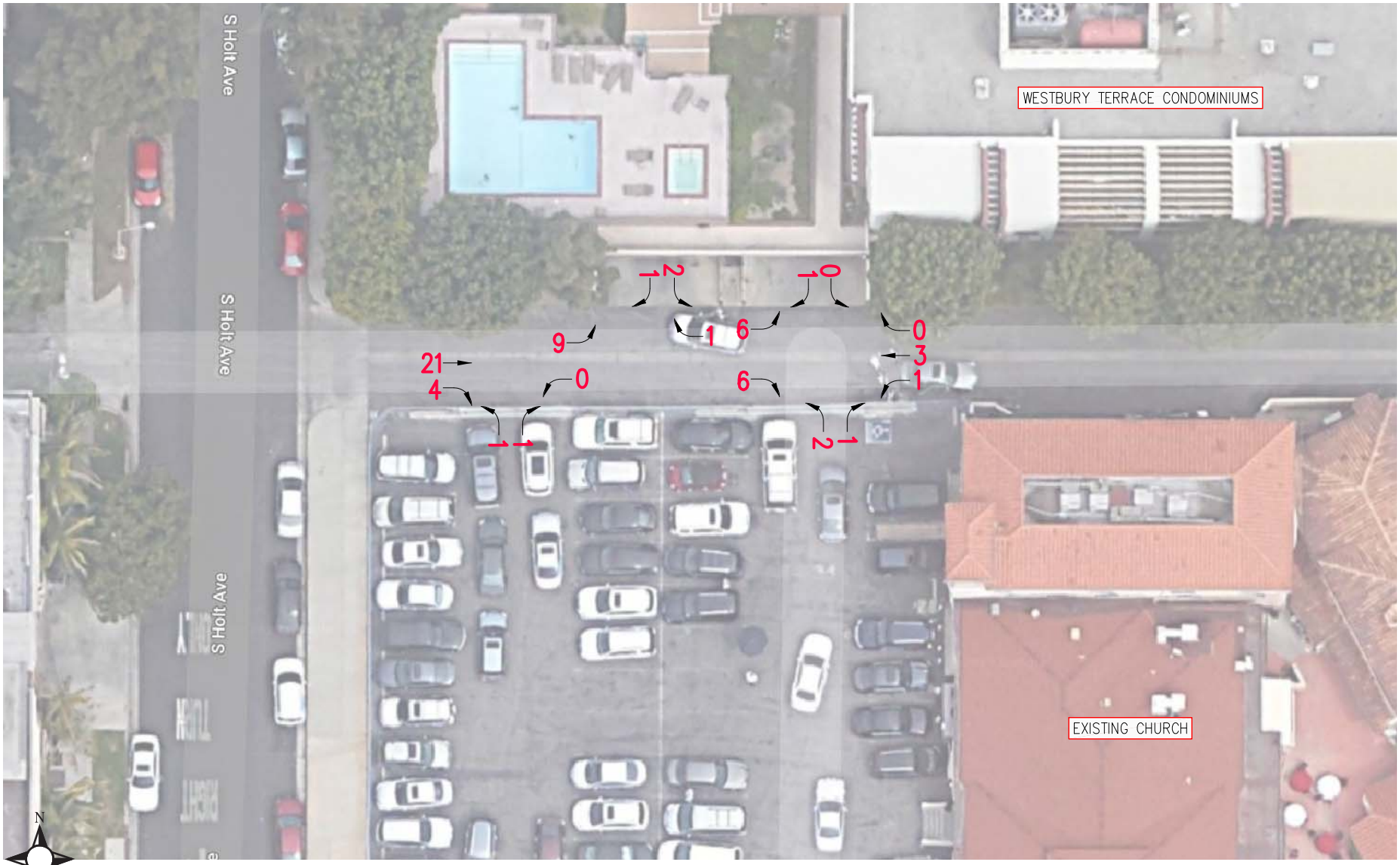

Figure IV.I-4

Existing Driveway Traffic Volumes – Weekday Pre-Event P.M. Peak Hour

Source: Linscott, Law & Greenspan, engineers, 2019.

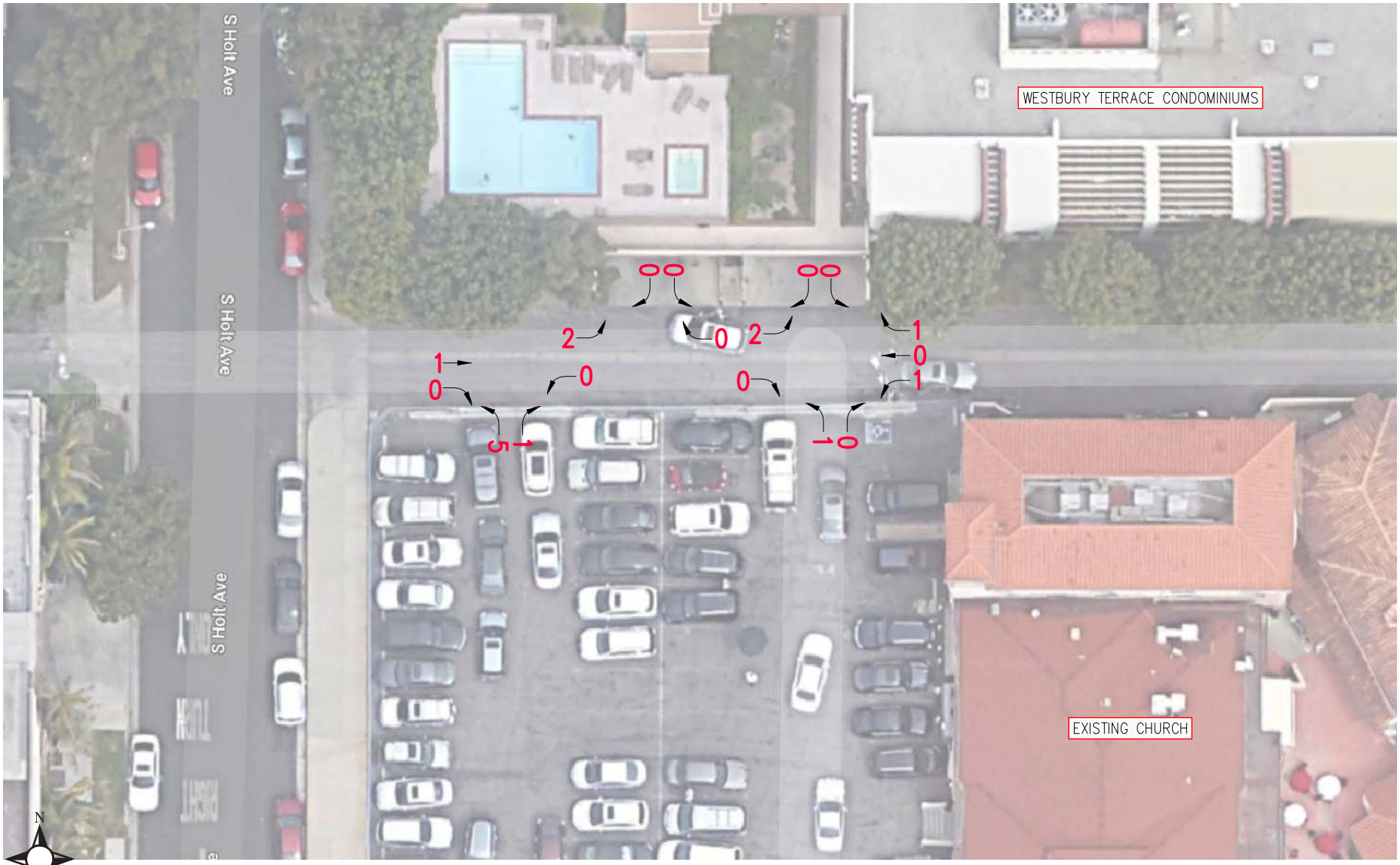

Figure IV.I-5

Existing Driveway Traffic Volumes – Weekday Post-Event P.M. Peak Hour

Source: Linscott, Law & Greenspan, engineers, 2019.

Summary data worksheets of the manual traffic counts at the driveways are contained in Appendix A to the Transportation Addendum.

Figure IV.I-3 and Figure IV.I-4 on pages IV.I-37 and IV.I-38 display the existing traffic volumes entering and exiting the Westbury Terrace parking garage via the alley during the weekday A.M. and P.M. commuter peak hours, respectively. During the A.M. peak hour, 27 vehicles were counted (7 inbound, 20 outbound) at the Westbury Terrace driveways as shown on Figure IV.I-3. Similarly, during the P.M. peak hour, 20 vehicles were counted (16 inbound, 4 outbound) at the Westbury Terrace driveways as shown on Figure IV.I-4. In addition, during the Post-Event peak hour, 5 vehicles were counted (5 inbound, 0 outbound) at the Westbury Terrace driveways as shown on Figure IV.I-5 on page IV.I-39. For informational purposes, the counted trip generation at the Westbury Terrace driveways was compared to the number of trips that would be forecast using applicable trip generation rates from the ITE Trip Generation Manual. For the 82 units at Westbury Terrace, application of the ITE trip rates (0.31 trip/unit for the A.M. peak hour and 0.36 trip/unit for the P.M. peak hour) results in a forecast of 25 trips in the A.M. peak hour and 29 trip in the P.M. peak hour for Westbury Terrace. The actual trips counted at the Westbury Terrace driveways during the commuter peak hours are generally within the range of what would be forecast using the ITE trip rates.

(4) Project Trip Generation and Assignment

The trip generation forecast for the Project is provided in Table 1 in the Traffic Addendum (which has been updated from the trip generation forecast provided in the approved traffic study due to a slight change in the church floor area as discussed therein). The Project on a typical weekday is forecast to result in 48 A.M. peak-hour trips (14 inbound trips/34 outbound trips) and 60 P.M. peak-hour trips (35 inbound trips/25 outbound trips). Figure 7-1 from the approved Transportation Study provides the forecast trip distribution of Project traffic to the alley (i.e., vehicles approaching/departing to and from the east and west.).

As noted above, upon completion of the Project, events held at the Existing Church would have a capacity of approximately 475 people. For this analysis, the following assumptions were made:

- Approximately 90 percent of guests (i.e., 428 guests) would arrive in private automobiles, at an average rate of 3 persons per vehicle.[19] This would result in 143 vehicles requiring parking at the site.

- The remaining 10 percent of guests (i.e., 47 guests) would arrive by other means, including Uber/Lyft, walking, etc. Guests arriving and departing by Uber/Lyft would utilize the Project's proposed passenger loading area on San Vicente Boulevard and therefore would not utilize the Project's vehicle entry/exit on the alley.

- It is conservatively assumed the 143 vehicles related to guests at a peak event would arrive and depart in a one-hour period, although it is more likely that arrivals and departures would be dispersed over a greater period of time.

(5) Existing with Project Traffic Volumes

As previously noted, the existing traffic volumes in the alley at the Existing Church and Westbury Terrace driveways during the weekday A.M., P.M., and Post-Event peak hours are presented in Figure IV.I-3, Figure IV.I-4, and Figure IV.I-5 on pages IV.I-37, IV.I-38, and IV.I-39, respectively. The forecast traffic volumes associated with the Project are then added to the existing volumes to obtain the Existing with Project traffic volumes, which are shown on Figure IV.I-6, Figure IV.I-7, and Figure IV.I-8 on pages IV.I-42, IV.I-43, and IV.I-44 for the weekday A.M. commuter peak hour, Pre-Event peak hour, and Post-Event peak hour, respectively. The Pre-Event and Post-Event peak-hour trips in Figure IV.I-7 and Figure IV.I-8 include traffic associated with both the residential building, the church space, and a special event in the multi-purpose room at the maximum occupancy of 475 people.

(6) Driveway Operation Analysis

An analysis was prepared to evaluate expected operations in the alley upon buildout of the Project. The operational analysis was prepared using the existing and forecast weekday A.M., P.M., and Post-Event peak-hour traffic counts in the alley. Motorist delay and vehicle queuing in the alley have been calculated at the Project and Westbury Terrace driveways for the Existing and Existing with Project conditions. The analysis was prepared using the unsignalized intersection methodology provided in the Highway Capacity Manual (HCM) published by the Transportation Research Board. The HCM methodology allows the analysis of turning movements at the driveway, with the following specific outputs:

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[19] *The Shared Parking Manual (Second Edition) published by the Urban Land Institute recommends a vehicle occupancy of three persons per car for purposes of forecasting parking demand at entertainment venues such as live theaters.*

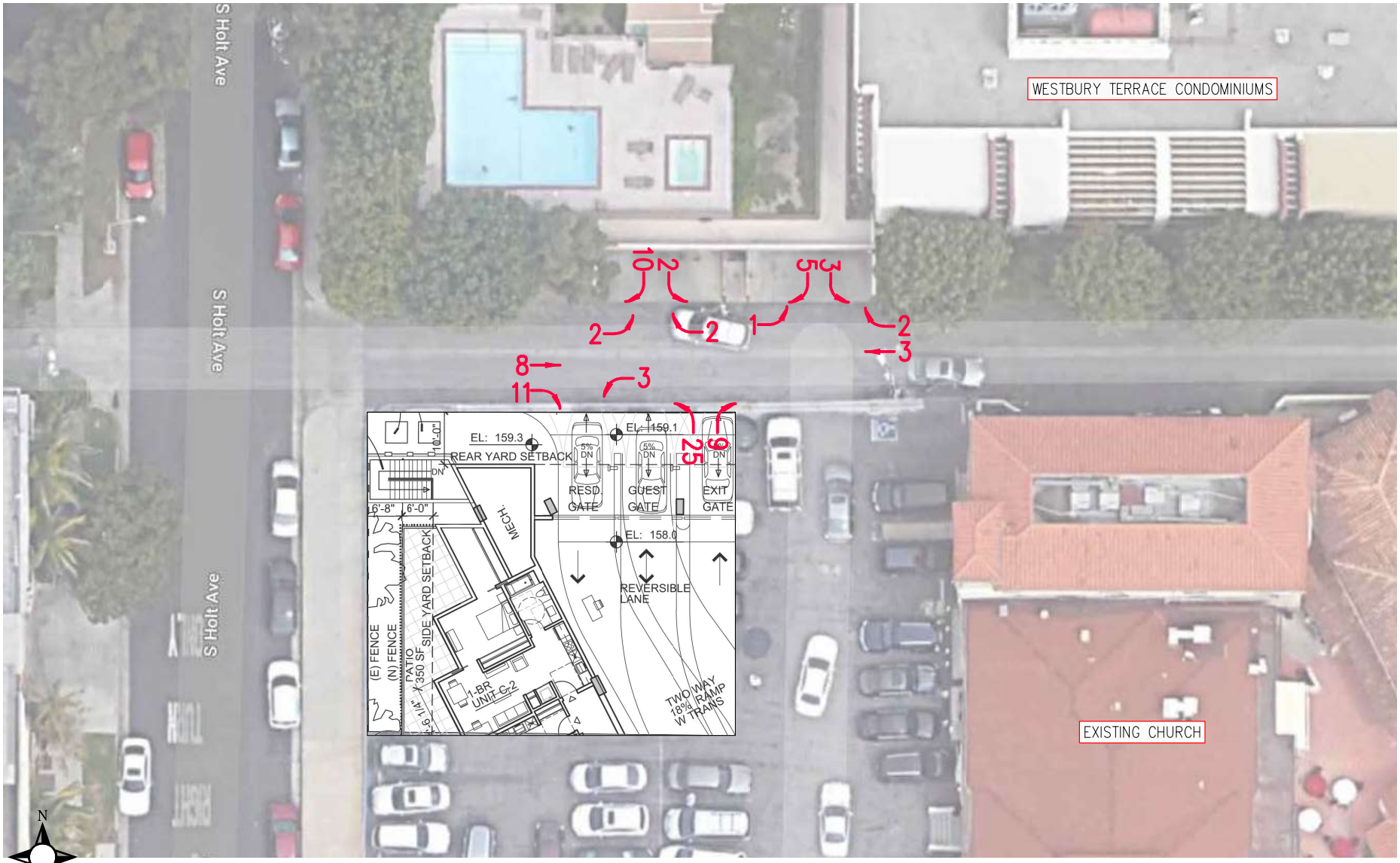

Figure IV.I-6

Existing with Project Driveway Traffic Volumes – Weekday A.M. Peak Hour

Source: Linscott, Law & Greenspan, engineers, 2019.

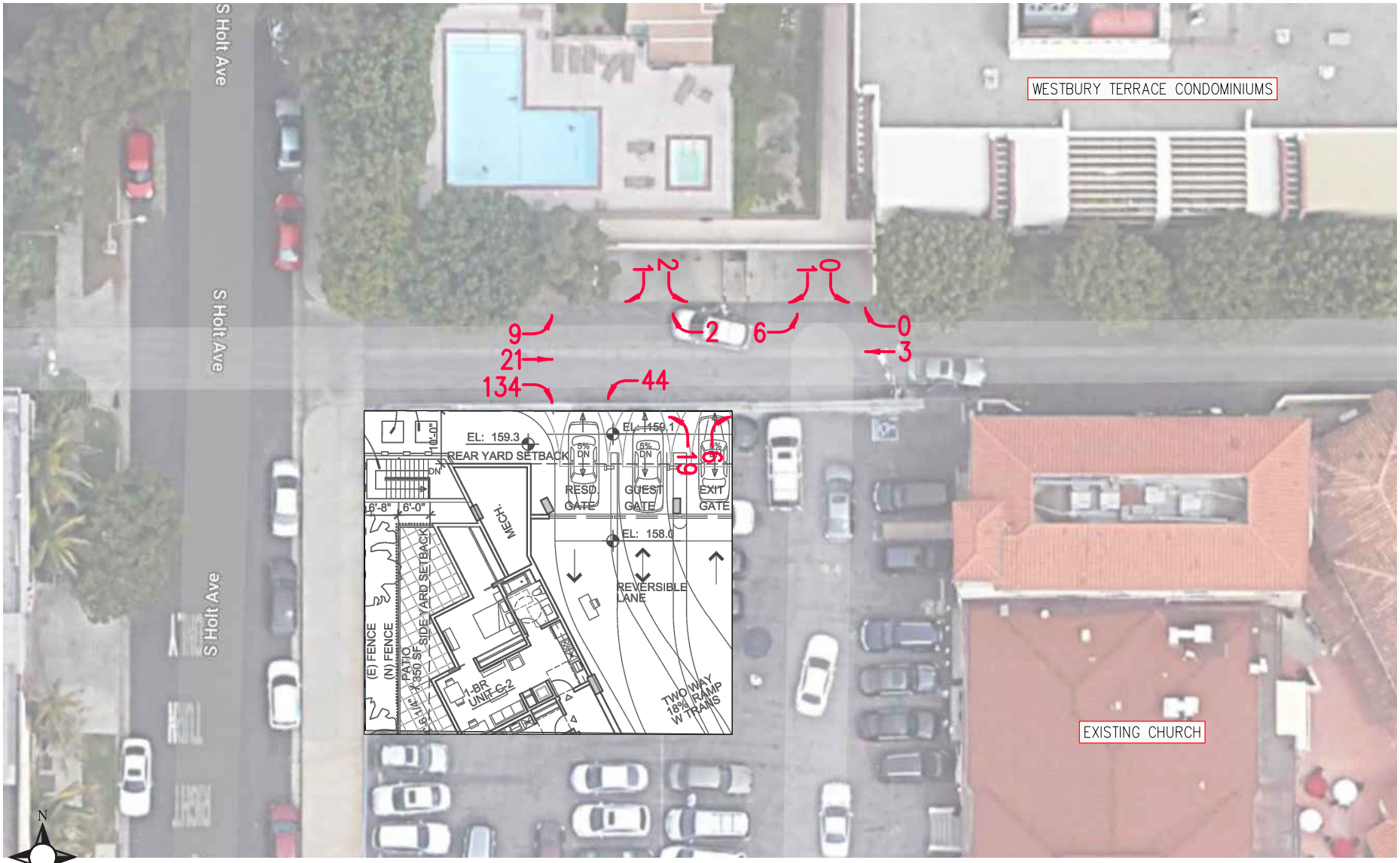

Figure IV.I-7

Existing with Project Driveway Traffic Volumes – Weekday Pre-Event P.M. Peak Hour

Source: Linscott, Law & Greenspan, engineers, 2019.

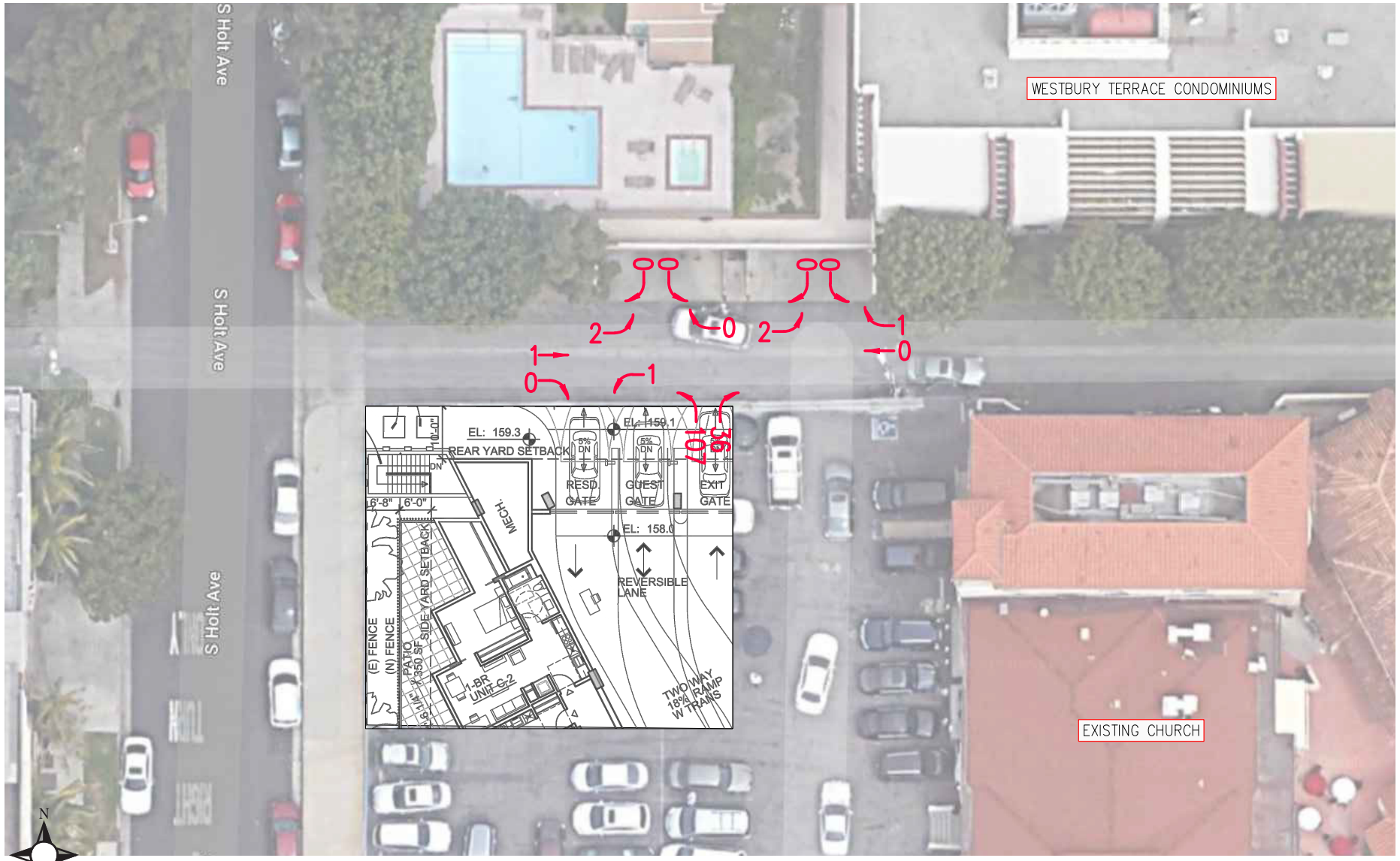

Figure IV.I-8

Existing with Project Driveway Traffic Volumes – Weekday Post-Event P.M. Peak Hour

Source: Linscott, Law & Greenspan, engineers, 2019.

- Control delay (measured in vehicles/seconds): Control delay is the estimated time that the average motorist will be require to wait prior to completing a specific turning movement at an intersection during the analyzed peak hour.

- LOS: A qualitative description of operations at an intersection, ranging from LOS A to F. LOS is defined based on calculated amount of motorist delay.

- 95th Percentile Vehicle Queue: The calculated length of vehicle queues waiting to complete a specific turning movement at an intersection during the analyzed peak hour. The 95th percent confidence level indicates that the queue will be at or below this length 95 percent of the time during the analyzed peak hour.

Control delay, LOS, and 95th Percentile Vehicle Queue calculations have been prepared for the Project driveway under Existing and Existing with Project conditions during the A.M., P.M., and Post-Event peak hours. Table 2 in the Transportation Addendum provides a summary of the HCM analysis for the alley during the analyzed peak hours. The HCM data worksheets for the driveway are contained in Appendix B to the Transportation Addendum. Key points from the data provided in Table 2 are as follows:

- Vehicles exiting the Westbury Terrace driveways onto the alley currently experience minimal delay during the commuter peak hours (average delay calculated at approximately 8.5 seconds per motorist, which corresponds with LOS A operations). This is generally the minimum delay value produced by the HCM analysis for motorists turning left from a minor approach or driveway. There are minimal vehicle queues related to vehicles exiting the Westbury Terrace driveways onto the alley (i.e., less than one exiting vehicle queuing into the Westbury Terrace parking areas during the commuter peak hours).

- Vehicles turning left into the Westbury Terrace driveways from the eastbound alley also currently experience minimal delay during the commuter peak hours (average delay calculated at approximately 7.3 seconds per motorists, which corresponds with LOS A operations). This is generally the minimum delay value produced by the HCM analysis for motorists turning left from a roadway to a minor approach or driveway. There are minimal vehicle queues related to vehicles attempting to turn left into the Westbury Terrace driveways from the alley (i.e., less than one vehicle queuing on the alley during the commuter peak hours).

- With the Project, there would be a slight increase, in some circumstances, in the calculated average delay or vehicle queuing related to motorists entering or exiting the Westbury Terrace driveways on the alley during the weekday A.M. commuter peak hour, the weekday Pre-Event peak hour (conservatively assumed in this analysis to coincide with the weekday commuter P.M. peak hour), and the Post-Event peak hour. This is due primarily to the following: (1) the relatively low volume of existing through traffic in the alley (i.e., vehicles traveling in the alley between Holt Avenue and San Vicente Boulevard); (2) the relatively

small number of vehicles currently entering and exiting the Westbury Terrace driveways; and (3) the limited nature of conflicting traffic movements between existing vehicles entering and exiting the Westbury Terrace driveways and future vehicles entering and exiting the Project driveway. More specifically:

- A.M. Peak Hour—As shown in Figure IV.I-6 on page IV.I-42, during the weekday A.M. peak hour, 15 cars were counted to turn right from the Westbury Terrace driveways (one car every four minutes). Future vehicles turning to or from the Project driveway would not be in conflict with the outbound right turns from Westbury Terrace because the Westbury Terrace vehicles turning right from the driveways have the assigned right-of-way over future vehicles turning to and from the Project driveway. Figure IV.I-6 also shows five vehicles turning left from the Westbury Terrace driveways during the A.M. peak hour (one car every 12 minutes). The three vehicles forecast to turn left from the alley into the Project driveway (one car every 20 minutes) and the nine vehicles forecast to turn right from the Project driveway (one car every 6.5 minutes) would be the only additional conflict for vehicles turning left from the Westbury Terrace driveways during the A.M. peak hour. Finally, Figure IV.I-6 shows three cars turning left from the alley into the Westbury Terrace driveways during the weekday A.M. peak hour (one car every 20 minutes). Future vehicles turning to or from the Project driveway would not be in conflict with this left-turn because vehicles turning left from the alley to the Westbury Terrace driveways have the assigned right-of-way over future vehicles turning to and from the Project driveway.

- Pre-Event Peak Hour—As shown in Figure IV.I-7 on page IV.I-43 (which includes cumulative traffic associated with the residential building, the church space and a special event in the multi-purpose room at the maximum occupancy of 475 people), during the weekday Pre-Event peak hour (conservatively assumed in this analysis to coincide with the weekday P.M. commuter peak hour), two cars were counted to turn right from the Westbury Terrace driveways (one car every 30 minutes). Future vehicles turning to or from the Project driveway would not be in conflict with the outbound right turns from Westbury Terrace because the Westbury Terrace vehicles turning right from the driveways have the assigned right-of-way over future vehicles turning to and from the Project driveway. Figure IV.I-7 also shows two vehicles turning left from the Westbury Terrance driveways during the P.M. peak hour (one car every 30 minutes). The 44 vehicles that are forecast to turn left into the Project driveway (one car every 90 seconds), and the six vehicles that are forecast to turn right from the Project driveway (one car every 10 minutes), would be the only additional conflict for the two vehicles turning left from Westbury Terrace driveways, resulting in the incremental increase in the average delay per motorist for vehicles exiting the Westbury Terrace driveways during the Pre-Event peak hour as shown in Table 2 of the Traffic Addendum (from 8.6 seconds to 9.2 seconds).

In addition, Figure IV.I-7 on page IV.I-43 shows 15 cars entering the alley from Holt Avenue turning left into the Westbury Terrace driveways from the alley during the weekday Pre-Event peak hour (one car every four minutes). Future vehicles exiting the Project driveway would not be in conflict with this left turn because Westbury Terrace vehicles entering the alley to access the Westbury Terrace driveways would have the right-of-way priority over vehicles exiting from the Project driveway.

With respect to future Project vehicles that would turn onto the Project driveway, most vehicles would enter the alley from Holt Avenue and turn right into the Project driveway, Figure IV.I-7 shows the forecast of 134 vehicles (approximately one car every 27 seconds) entering the alley from Holt Avenue and turning right into the Project driveway. Most of these forecast right-turn vehicles are related to traffic arriving for a special event. These right-turn vehicles do not conflict with and therefore would not cause any material delay to, existing motorists entering the Westbury Terrace driveway by turning left from the alley. This is because the 134 cars arriving at the Project Site during the Pre-Event peak hour (again, approximately one car every 27 seconds) would immediately turn right into the Project garage (i.e., would not cause queuing within the alley) and thus would not cause any material delay to the 15 cars (one car every four minutes) arriving at the alley from Holt Avenue to turn left into the Westbury Terrace driveways. Further, based on the number of arriving vehicles at the Project Site during the Pre-Event peak hour, cars would not queue from the alley onto Holt Avenue.

These are the reasons why the Pre-Event traffic volumes associated with the Project do not materially change motorist delay related to inbound and outbound traffic movements at the Westbury Terrace driveways.

– Post-Event Peak Hour—As shown in Figure IV.I-8 on page IV.I-44, during the weekday Post-Event peak hour, no cars were counted to turn left or right from the Westbury Terrace driveways. Therefore, Project vehicle traffic related to the Post-Event peak hour would not affect traffic movements exiting Westbury Terrace. Figure IV.I-8 also shows four cars turning left into the Westbury Terrace driveways during the weekday Post-Event peak hour (one car every 15 minutes). Future vehicles turning to or from the Project driveway would not be in conflict with this left-turn because vehicles turning left from the alley to the Westbury Terrace driveways have the assigned right-of-way over future vehicles turning to and from the Project driveway.

In summary, the preceding analysis concludes that the Project would not materially change traffic operations on the alley, specifically as it relates to inbound and outbound traffic movements associated with the Westbury Terrace residential development, nor result in significant queuing or hazardous conditions. As such, operation of the Project, including traffic movements along the alley, would not create any hazardous condition.

Therefore, 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, and in the Alley Analysis above, no impact with respect to Threshold (c) would occur. No further analysis is required.

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

As summarized in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study (Appendix A to this Draft EIR), while it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the CTM Plan that would be implemented pursuant to Project Design Feature TR-PDF-1 to ensure adequate circulation and emergency access. With regard to operation, 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. The Project does not propose the permanent closure of any local public streets, and primary access to the Project Site would continue to be provided from San Vicente Boulevard and Burton Way. In addition, 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 LAMC Section 57.118, and which are required prior to the issuance of a building permit. Therefore, the Project would not result in inadequate emergency access within the project vicinity or cause an impediment along the City's designated disaster routes. **As determined in the Initial Study, impacts with respect to Threshold (d) would be less than significant. No further analysis is required.**

f. Cumulative Impacts

(1) Impact Analysis

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

(i) Los Angeles Municipal Code Section 12.37

Similar to the Project, each of the related projects located along streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan would be required to provide any necessary dedications should any of those roadways not meet designated Mobility Plan widths. This would allow the City to widen those roadways in the

future if it chooses to do so. Therefore, the Project, together with the related projects, would not result in a cumulative impact with respect to LAMC Section 12.37

(ii) Mobility Plan 2035

Implementation of the Project, together with the related projects, would not create conflicts with the Mobility Plan. The related projects primarily propose high-density mixed-use developments in an area with good transit connectivity, reducing dependence on automobiles and encouraging more active travel modes. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with applicable policies identified in the Mobility Plan.

(iii) Citywide Design Guidelines

Similar to the Project, the related projects would be expected to incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Most of the related projects that are located on arterial streets would include improvements to the pedestrian realm in support of an active, walkable neighborhood environment. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to conflicts with Citywide Design Guideline 2.

(iv) LADOT Manual of Policies and Procedures Section 321

Similar to the Project, the related projects would be required to comply with MPP Section 321, which calls for the minimum number of driveways, consistent with street and lot capacity, located on streets with the least traffic volume when possible. Therefore, the Project, together with the related projects, would not result in cumulative impacts with respect to conflicts with MPP Section 321.

(viii) Conclusion

For these reasons: (1) the Project's impact related to conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and the effect of related projects related to the same would be less than significant.

(b) Vehicle Miles Traveled

As discussed in the TAG, long-term or cumulative effects are determined through a consistency check with SCAG's RTP/SCS and projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and

greenhouse gas reduction goals of the RTP/SCS. As discussed in detail in Section IV.E, Greenhouse Gas Emissions, and Section IV.F, Land Use, of this Draft EIR, the Project would be consistent with the RTP/SCS. Furthermore, as described above, accounting for the TDM program elements already included in the Project (i.e., code-required bicycle parking and pedestrian network improvements), and with implementation of Mitigation Measure TR-MM-1, the Project would result in an average household VMT per capita of 5.8 and an average work VMT per capita per employee of 2.8, below the thresholds for the Central APC (6.0 and 7.6, respectively). While one or more of the related projects may result in a significant VMT impact (which would be fully or partially mitigated), in accordance with the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulatively significant VMT impact.[20] **Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of the RTP/SCS, so that (1) the Project's contribution to cumulative impacts related to VMT would not be cumulatively considerable and, therefore, would be less than significant and (2) the cumulative impact of the Project's effect and the effect of related projects with respect to VMT would be less than significant.**

(c) Hazardous Geometric Design Features

As discussed above, no Project-level impact would occur with respect to hazardous geometric design features. The roadways in the surrounding area are part of the existing urban roadway network and do not contain sharp curves or dangerous intersections. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by LAFD. The design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be similar to and consistent with the surrounding uses. **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, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. Like the Project, the related projects would be anticipated to provide for safe and efficient circulation by including adequate sight distances, implementing multi-modal transportation strategies to

[20] *LADOT, Transportation Assessment Guidelines, July 2019, p. 20.*

facilitate the dispersal of traffic, and alleviating project-specific traffic access impacts, as appropriate. In addition, as previously discussed, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the required respect for emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, 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 to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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