IV. Environmental Impact Analysis

M. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. This section also includes an analysis of Vehicle Miles Traveled (VMT). The analysis is primarily based on the *Transportation Assessment for the Harvard-Westlake River Park Project* (TA)[1] prepared for the Project, included in its entirety in Appendix M of this Draft EIR. The TA was prepared pursuant to the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated 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 TA was approved by LADOT on June 10, 2021, with an updated approval on June 11, 2021. A copy of LADOT's Assessment Letter for the TA is included in Appendix M of 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
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

[1] Fehr & Peers, Transportation Assessment – Harvard-Westlake River Park Project for Assessor Parcel Numbers 2375-018-020 and portion of APN 2375-018-903 Los Angeles River Parcel 276,4141 Whitsett Avenue, Studio City, CA 91604, April 2021.

- City of Los Angeles Mobility Plan 2035
- Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Interim Guidance for Freeway Safety
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles
- Los Angeles River Design Guidelines

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), 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 (AB) 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 (AB 32) and Senate Bill 375 (SB 375)

With the passage of Assembly Bill (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 Senate Bill (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 California Vehicle Code (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 was released on 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 (CNRA) 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 (TAG) in July 2019 and updated in July 2020, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

(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[2] or a stop along an existing high quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG

(3) Regional

(a) Southern California Association of Governments 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020-2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016-2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or

2 "Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

3 "High-quality transit corridors" are defined in (PRC)Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020-2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a five percent reduction in VMT per capita, nine percent reduction in vehicle hours traveled, and a two percent increase in work-related transit trips.

(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.[4] 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.

[4] 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 (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular

traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.

- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan 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 Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) area. The Community Plan was initially adopted in 1998 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[5]

The Community Plan includes the following transportation and circulation goals, objectives, and policies that are applicable to the Project:

Policy 4-1.2: Increase accessibility to The [*sic*] Los Angeles River.

Goal 11: Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicular trips.

Objective 11-1: To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policy 11-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, walking, bicycles, etc.).

[5] City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, adopted May 13, 1998.

Policy 11-1.3: Require that proposals for major new non-residential development projects include submission of a TDM (Transportation Demand Management) Plan to the City.

Goal 13: To the extent feasible and consistent with the Mobility Plan 2035's and community plans' policies promoting multi-modal transportation and safety, a system of freeways, and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining a desired level of service at intersections.

Objective 13-1: To the extent feasible and consistent with the Mobility Plan's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure [*sic*] that necessary road access and street improvements are provided to accommodate traffic generated by new development.

Policy 13-1.3: Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures

Policy 13-1.4: New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.

Objective 13-2: To ensure that the location, intensity and timing of developed transportation infrastructure utilizing the City's streets standards.

Policy 13-2.2: Driveway access points onto arterial and collector streets should be limited in number and be located to insure the smooth and safe flow of vehicles and bicycles

Goal 14: A system of safe, efficient, and attractive bicycle, pedestrian and equestrian facilities.

Objective 14-1: To promote an adequate system of safe bikeways for commuter, school, and recreational use.

Policy 14-1.1: Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City.

Policy 14-1.2: Encourage the provision of showers, changing rooms, and bicycle storage at new and existing non-residential developments and public places.

Goal 15: A sufficient system of well designed and convenient on-street parking and off-street parking facilities throughout the plan area.

Objective 15-1: To provide parking in appropriate locations in accord with Citywide standards and community needs.

Policy 15-1.1: Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials.

Policy 15-1.3: New parking lots and new parking garages shall be developed in accordance with design standards.

The Community Plan also includes a relevant Community Design and Landscaping Standard in Chapter V, Urban Design:

Public Open Space and Plazas: Establish public open space standards that will guide the design of new public plazas and open spaces, which should include (1) consideration of the siting of open space to maximize pedestrian accessibility and circulation, (2) solar exposure or protection, (3) adjacency to pedestrian routes and other open spaces, and (4) appropriate plant and hard scape materials.

(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. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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 Transportation Demand Management (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 VMT, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the Transportation Assessment Guidelines (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. 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.[6]

(e) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (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 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) Interim Guidance for Freeway Safety

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased

6 Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, July 2020.

traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

(h) Citywide Design Guidelines

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

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[7] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

(j) Los Angeles River Design Guidelines

The River Improvement Overlay (RIO) District is a special use district established by Ordinance Nos. 183,144 and 183,145 in August 2014 to support the goals of the Los Angeles River Revitalization Master Plan; contribute to the environmental and ecological health of the City's watersheds; establish a positive interface between river adjacent property and river parks and/or greenways; promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods; provide native habitat and support local species; provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; provide safe, convenient access to and circulation along the river; promote the river identity of river adjacent communities; and support the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program. The RIO District Ordinances establish landscaping, design criteria, and administrative review procedures for projects within the RIO District.[8] The Los Angeles River Design Guidelines complement the Los Angeles River Revitalization Master Plan and builds on the original draft Los Angeles River Design Guidelines from July 2015.[9]

7 City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.

8 City of Los Angeles Department of City Planning, Zoning Information No. 2358, River Improvement Overlay District, Ordinance Nos. 183,144 and 183,145, revised January 12, 2015.

9 City of Los Angeles, LA River Design Guidebook: Boyle Heights, Arts District, Lincoln Heights, Chinatown East, 2016.

b) Existing Conditions

(1) Street System

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area. As shown in Figure II-1 of Chapter II, *Project Description*, of the Draft EIR, the Project Site, collectively including the School (Property) and the 1.1-acre parcel the School leases from Los Angeles County (Leased Property), is generally bounded by Bellaire Avenue to the west, Valley Spring Lane to the north, the Los Angeles River and Valleyheart Drive to the south, Whitsett Avenue to the east, and the Los Angeles Fire Department (LAFD) Station 78 to the southeast. The streets in the Project vicinity are under the jurisdiction of the City of Los Angeles. Freeways are under the jurisdiction of Caltrans. Immediate access to the Project Site is provided via one inbound and one outbound driveway on Whitsett Avenue, one service driveway on Valley Spring Lane, and a second service driveway at the end of Valleyheart Drive.

(a) Freeways

Primary regional access to the Project Site is provided by the Ventura Freeway (US-101). US-101 runs in the east-west direction and is located north of the Project Site. The US-101 interchanges are 1.2 miles to the northeast via Laurel Canyon Boulevard and 1.3 miles to the northwest via Coldwater Canyon Avenue.

(b) Roadways

The characteristics of the major roadways in the Project vicinity are described below.

(i) East/West Roadways

Ventura Boulevard is designated as a Boulevard II and is located south of the Project Site. Ventura Boulevard provides two through lanes in each direction with parking permitted on both sides of the street. Ventura Boulevard is included in the HIN, the BEN (proposed Tier 3 Bicycle Lane), and the TEN in the Mobility Plan 2035. Ventura Boulevard is also part of the PED, except for the portion between Fairway Avenue and Laurelgrove Avenue.

Moorpark Street is designated as an Avenue II and is located north of the Project Site. Moorpark Street provides one through lane in each direction. A center left-turn lane is provided along portions of Moorpark Street. One parking lane and one bicycle lane are provided in each direction. Moorpark Street is part of the BEN in the Mobility Plan 2035, and the proposed Tier 2 Bicycle Lane has been constructed.

Valley Spring Lane is designated as a Local Street and is located adjacent to the Project Site to the north. Valley Spring Lane provides one lane in each direction with parking allowed on both sides, and no parking allowed on the south side between 10:00 p.m. and 6:00 a.m.

Valleyheart Drive is designated as a Local Street in Mobility Plan 2035. However, between Whitsett Avenue and Bellaire Avenue, Valleyheart Drive is a paper street only. The existing paved portion of Valleyheart Drive, adjacent to LAFD Fire Station 78, is owned by the City of Los Angeles. The remaining portion of the Valleyheart Drive right-of-way to the west to Bellaire Avenue, which is not constructed as a street, is owned by Los Angeles County.

(ii) North/South Roadways

Coldwater Canyon Avenue is designated as an Avenue II and is located west of the Project Site. Coldwater Canyon Avenue provides two lanes in each direction with parking permitted on both sides of the street, except in the segment between Ventura Boulevard and 100 feet south of Woodbridge Street. The portion of Coldwater Canyon Avenue south of Woodbridge Street is included in the PED in the Mobility Plan 2035. Coldwater Canyon Avenue provides access to the existing Harvard-Westlake Upper School Campus (Upper School Campus).

Whitsett Avenue is designated as an Avenue II and is located adjacent to the Project Site to the east. In the southbound direction, Whitsett Avenue provides two lanes and one parking lane. In the northbound direction, Whitsett Avenue provides one lane between Ventura Boulevard and Woodbridge Street and two lanes between Woodbridge Street and Moorpark Street. Parking is provided in the northbound direction although it is restricted during peak periods between Ventura Boulevard and Woodbridge Street so that an additional travel lane may be provided, increasing the number of travel lanes from one to two.

Laurel Canyon Boulevard is designated as an Avenue I and is located east of the Project Site. Laurel Canyon Boulevard provides two lanes in each direction with parking permitted on both sides of the street. Laurel Canyon Boulevard is included in the BEN (proposed Tier 2 Bicycle Lane). The portion between Ventura Place and Ventura Boulevard is included in the HIN. The portion south of the Valley Spring Lane is part of the PED in the Mobility Plan 2035.

Bellaire Avenue is designated as a local street and is located adjacent to the Project Site to the west. Bellaire Avenue provides one lane in each direction with parking permitted on both sides of the street.

(2) Public Transit [10]

The Project Site is not located within a Transit Priority Area (TPA). However, the Project Site is served by several local and regional bus lines. The Project Site is located approximately 2.4 miles east from the Los Angeles County Metropolitan Transportation Authority (Metro) B Line Universal City/Studio City Station and approximately 2.3 miles southwest of the Metro B Line North Hollywood Station, which also serves the Metro G

[10] This section describes transit services based on pre-COVID-19 conditions. Metro and LADOT have been making service changes as part of their ongoing and evolving response to COVID-19.

Line. The Project Site is immediately adjacent to the Metro 167 Local Line and the LADOT Downtown Area Short Hop (DASH) Line Van Nuys/Studio City on Whitsett Avenue. Ventura Boulevard is served by Metro Local Routes 167, 150 and 240, and Metro Rapid Route 750. **Figure IV.M-1**, *Existing Transit Service*, shows the various local bus routes, rapid bus routes, and bus rapid transit (BRT) lines providing service in the Project vicinity, while **Table IV.M-1**, *Existing Transit Service*, details the transit service near the Project Site, as further described below.

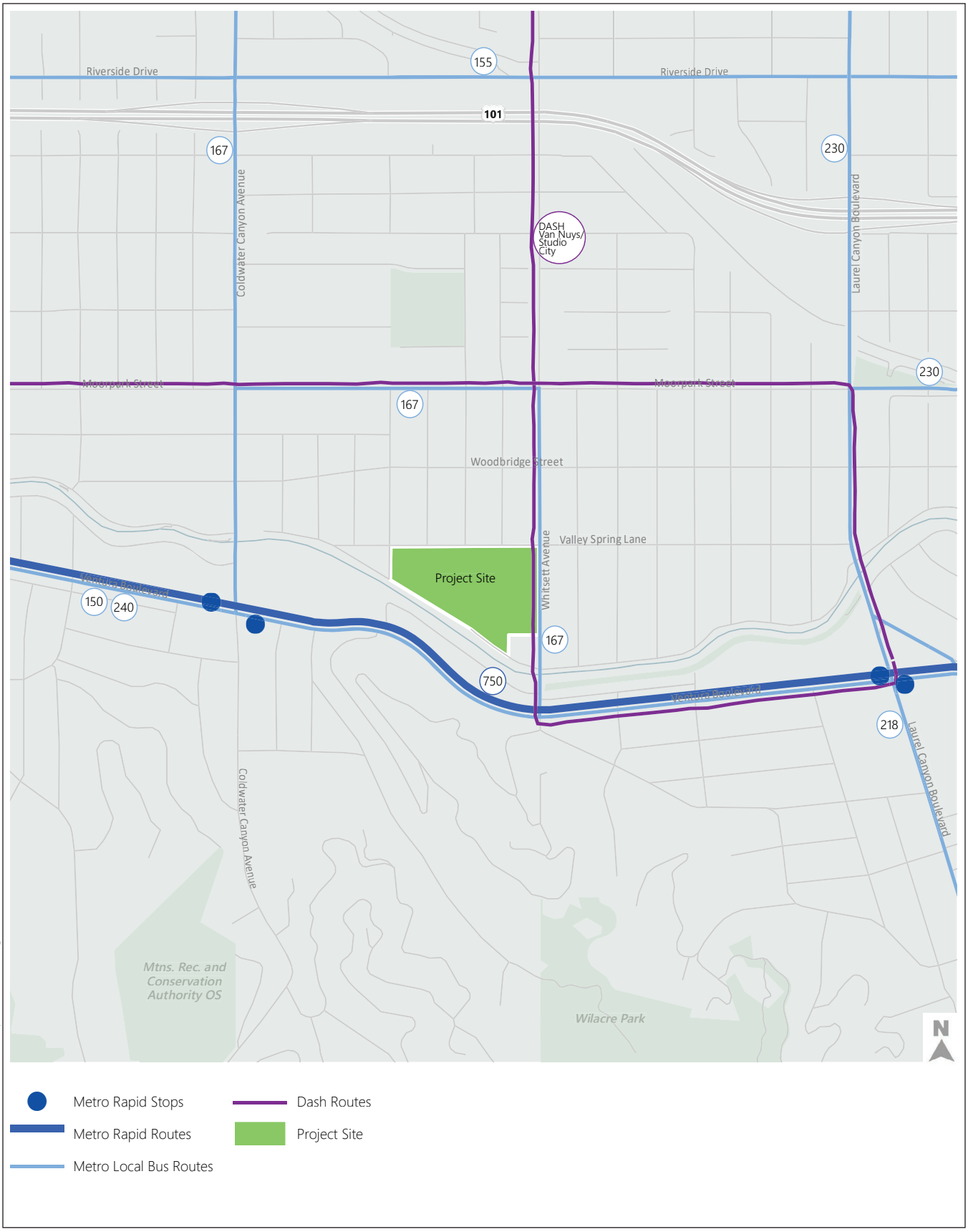
Metro Line 167 runs east of the Project Site along Whitsett Avenue with two stops near the Project Site. Line 167 has two stops in the southbound direction near the Project Site. The northern stop is located at the intersection of Whitsett Avenue and Valley Spring Lane, directly across the street from the Project. The southern stop is at located at the intersection of Ventura Boulevard and Whitsett Avenue, which includes a bus bench.

Metro Line 150 runs south of the Project Site along Ventura Boulevard. In the westbound direction, the closest stop to the Project Site – the Ventura/Whitsett stop – includes a bus shelter and bench. In the eastbound direction, the Ventura/Whitsett stop includes a bus shelter and bench.

Metro Line 240 shares the same route as Line 150 between Ventura Boulevard/Reseda Boulevard and the Metro B Line Universal City/Studio City Station. This line runs south of the Project Site along Ventura Boulevard. Line 240 has average headways of 20-30 minutes during the weekday AM and PM peak periods. Line 240 shares the same bus stops with Line 150 in the Project vicinity.

Metro Rapid 750 runs south of the Project Site along Ventura Boulevard. It has one bus stop in each direction at the intersection of Ventura Boulevard and Coldwater Canyon Avenue. The eastbound stop includes two bus benches. The westbound stop includes a bus bench.

LADOT DASH Van Nuys/Studio City provides circulator service in neighborhoods of Van Nuys, Sherman Oaks, and Studio City in Los Angeles. There are several stops near the Project Site on Whitsett Avenue. The northbound DASH has two stops. The northern stop at the intersection of Whitsett Avenue and Valley Spring Lane does not include any bus bench or shelter. The southern stop at the intersection of Whitsett Avenue and Valleyheart Drive includes a bus bench. The southbound DASH includes an existing bus stop at the intersection of Whitsett Avenue and Valley Spring Lane, which does not include bus benches or bus shelter.



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SOURCE: Fehr & Peers, 2022

Harvard-Westlake River Park Project

Figure IV.M-1
Existing Transit Service

TABLE IV.M-1
EXISTING TRANSIT SERVICE

					Weekday Headways	
Transit Route	**Operator**	**Service Type**	**Service From**	**Roadway(s) Near Site**	**A.M.**	**P.M.**
167	Metro	Local	Studio City to Chatsworth	Whitsett Avenue	40-50 mins.	40-50 mins.
150	Metro	Local	Studio City to Canoga Park	Ventura Boulevard	20-45 mins.	20-45 mins.
240	Metro	Local	Studio City to Northridge	Ventura Boulevard	20-30 mins.	20-30 mins.
750	Metro	Rapid	Studio City to Canoga Park	Ventura Boulevard	20 mins.	20 mins.
Van Nuys/Studio City	LADOT	Shuttle	Studio City to Van Nuys	Whitsett Avenue	30 mins.	30 mins.
Clockwise/Counterclockwise G Line	Metro	BRT	North Hollywood to Chatsworth	Chandler Boulevard	5 mins.	5 mins.
B Line	Metro	Heavy Rail	North Hollywood to Union Station	Lankershim Boulevard	10 mins.	10 mins.

NOTE: This table describes transit services based on pre-COVID-19 conditions. Metro and LADOT have been making service changes as part of their ongoing and evolving response to COVID-19.

SOURCE: Fehr & Peers, TA, 2021.

(3) Existing Project Site Access

Access to the Project Site is provided via adjacent roadways, including Whitsett Avenue, Valley Spring Lane, and Bellaire Avenue. Immediate access to the Project Site is provided via one inbound and one outbound driveway on Whitsett Avenue, one service driveway on Valley Spring Lane, and a second service driveway at the end of Valleyheart Drive.

(4) Existing LAFD Fire Station 78 Emergency Access (Off-Site)

With regard to LAFD Fire Station 78 emergency access, the station's main driveway used for the departure of the larger fire trucks from the station bays is located on Whitsett Avenue, north of Valleyheart Drive. The station also has two driveways on the north side of Valleyheart Drive. Of these two driveways, the westerly driveway is used for the return of the larger fire vehicles, which swing wide and use most of the Valleyheart Drive roadway to enter the fire station before proceeding to the bays. The easterly driveway to the fire station is used for the entry and departure of smaller vehicles, such as ambulances.

(5) Bicycle and Pedestrian Facilities

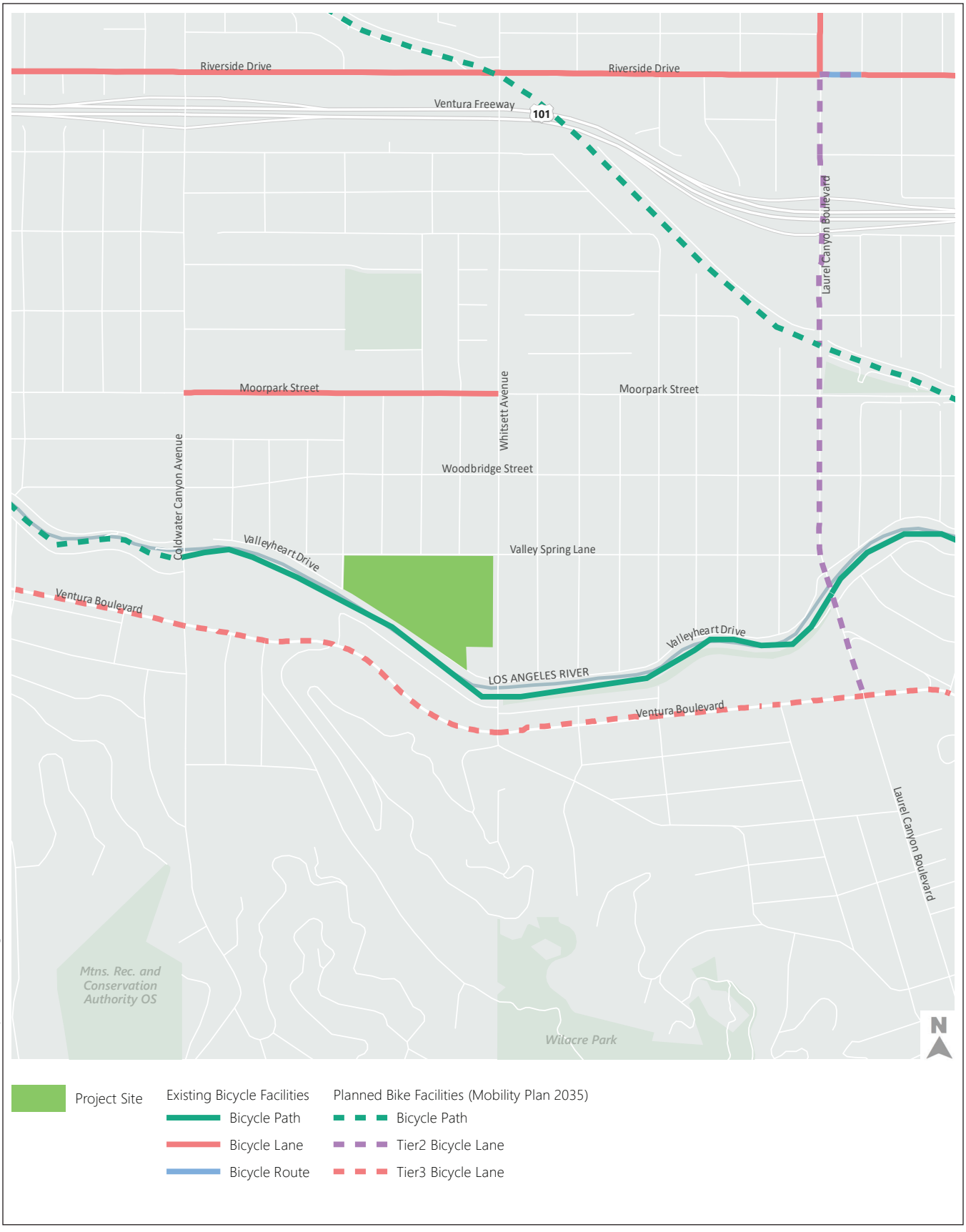
The Project Site's southern frontages are on the northern bank of the Los Angeles River, while the southern bank consists of the existing Los Angeles River Bicycle Path, which is part of the BEN identified in the City's Mobility Plan 2035. The Project Site's frontages are not along streets that are part of the PED.

Figure IV.M-2, *Bicycle Facilities in Project Vicinity,* shows the existing and planned Citywide designated bicycle facilities in the Project area. The existing bicycle path segments along the Los Angeles River from Laurel Canyon Boulevard to Whitsett Avenue and from Whitsett Avenue to Coldwater Canyon Avenue were completed and opened to the public in 2004 and 2019, respectively. The segment of Moorpark Street between Coldwater Canyon Avenue and Whitsett Avenue includes an existing bicycle lane in each direction.

Sidewalks are present along the Whitsett Avenue frontage of the Project Site. Sidewalks are not present along the east side of Bellaire Avenue and the south side of Valley Spring Lane adjacent to the Project Site, with the exception of a short stretch of sidewalk from Whitsett Avenue to near the driveway north of the clubhouse. The Zev Greenway, which is a segment of the Los Angeles River Trail, is located along the south side of the Project Site.

(6) Vision Zero

The Project Site's frontages are not along streets that are part of the HIN.



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SOURCE: Fehr & Peers, 2021

Harvard-Westlake River Park Project

Figure IV.M-2
Bicycle Facilities in Project Vicinity

c) Future Without Project Conditions

In the Mobility Plan 2035, there are no major planned transportation roadway improvements in the local Project vicinity.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. Bicycle Paths are bicycle facilities outside of the roadway, such as the Los Angeles River bicycle path. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those which are more likely to be built by 2035. Figure IV.M-2 shows the following planned bicycle improvements (along with existing bicycle facilities) in the Project vicinity per the Mobility Plan 2035:

- Planned bicycle paths in the study area include the Los Angeles River bicycle path segments west of Coldwater Canyon Avenue. The bicycle path segments east of Coldwater Canyon Avenue have been completed and opened to the public.
- There are no planned Tier 1 facilities in the study area.
- A Tier 2 facility is planned on Laurel Canyon Boulevard in the study area.
- A Tier 3 facility is planned on Ventura Boulevard in the study area.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds,[11] a 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?

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

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

Threshold (d): Result in inadequate emergency access?

[11] City of Los Angeles, California Environmental Quality Act (CEQA) Transportation Thresholds, July 2020.

In analyzing potential transportation impacts, the City has adopted the thresholds included in its CEQA Transportation Thresholds, which are the same as the impact questions included in Appendix G of the CEQA Guidelines. The City's CEQA Transportation Thresholds, along with the TAG, supersede the guidance and factors included the City's 2006 L.A. CEQA Thresholds Guide. The impact criteria in the TAG and the City's standard considerations are discussed below.

b) Methodology

The analysis of potential transportation impacts considers potential Project effects related to (1) potential conflicts with transportation-related plans, ordinances, or policies; (2) a substantial increase in VMT; (3) increased hazards due to a geometric design feature or incompatible use; and (4) emergency access.

The scope of the analysis in the TA was developed in consultation with LADOT. The base assumptions and VMT technical methodologies were identified and agreed to in the LADOT-reviewed and -approved MOU, which is included as Appendix A in the TA. The subsections below describe the methodologies to evaluate each significance threshold.

(1) Review for Conflicts with Plans, Programs, Ordinances, or Policies

As previously stated, the TAG requires Project review for conflicts with transportation-related plans, programs, ordinances, or policies. For projects meeting the screening criteria set forth in Section 2.1-2 of the TAG, the analysis addresses whether the Project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If the Project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself over time, and over a broad area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies.

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project area. The analysis considers whether there would be a significant impact to the environment to which both the Project and other projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located on the same block, were to preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework.[12]

[12] LADOT Transportation Assessment Guidelines, July 2020, p. 2-4.

(2) VMT Analysis

The Project would be classified under two different uses as specified in the TAG. First, the Project would be classified as an educational facility since it is owned by and would be operated by Harvard-Westlake School, and would be utilized by students, employees, and associated programs in conjunction with the private school. Per Section 2.2.4 of the July 2020 LADOT TAG, in order to provide a conservative analysis, the analysis assumes that the Project would attract people (employees and visitors) from a broader area and not just from the immediate vicinity.

Second, the community use component (publicly-accessible park and recreational areas) of the Project would be classified as a community-serving recreational facility. Per LADOT, and as stated in the MOU, which is provided in Appendix A of the TA, community-serving recreational facilities are exempt from VMT analysis. Since the community use component of the Project is exempt from VMT analysis, the VMT analysis focuses on the Harvard-Westlake athletic activities use as an educational facility. Therefore, for the remainder of the section, as it relates to VMT analysis, the Project refers specifically to the educational facility portion of the Project. Per Section 2.2.4 of the TAG, the Project would result in a significant VMT impact if the Project is expected to result in a net increase in daily VMT.

The total net daily VMT for all trips to and from the Project Site on an average day was estimated to assess the VMT impact of the Project. The Project's total daily VMT was calculated by multiplying the estimated average number of daily trips by an average trip length for each group of users of the site. For this Project, there are different populations that would make trips to and from the Project Site, including Harvard-Westlake students, visiting teams, spectators, and employees. In addition, trips generated by potential Harvard-Westlake Special Events (which are defined as events that are not related to regular academic activities or athletic programs, practices, or competitions that are expected to draw more than 100 attendees, including conferences, admission events and parent meetings) at the Project Site were averaged across the academic year. Finally, the net total VMT takes credit for existing VMT associated with the existing Weddington Golf & Tennis, as the VMT for these trips would be eliminated with the Project.[13] As indicated earlier, the VMT associated with the community use of the Project is not included in the analysis, as it is exempt per LADOT.

The methodology for estimating the average trip lengths for each population is described below. Further information regarding the methodology used to estimate daily trip generation for each of the populations, and the resultant estimated daily trips, is provided in Chapter 4.2 of the TA.

[13] Some existing components of Weddington Golf & Tennis, such as the café and putting green, will remain as part of the Project. However, the trip generation associated with these components is included in the overall Project trip generation. As such, the full existing use credit is taken for Weddington Golf & Tennis.

Harvard-Westlake (HW) Shuttles consists of the Harvard-Westlake students taking the shuttle between the Upper School and the Project Site (employees and visitors are also able to take the shuttles, though for the purpose of estimating VMT it was assumed that students are the only shuttle riders). The average trip length (1.5 miles) was estimated as the driving distance between the Upper School Campus and the Project Site.

HW Private Vehicles consists of the Harvard-Westlake students driving their private vehicles from the Upper School Campus to the Project Site. The average inbound trip length was estimated to be 1.5 miles, as the driving distance between the Upper School and the Project Site. The outbound trips (students driving home after an activity at the Project Site) are not estimated to generate a net increase in VMT as there was no difference found between the average trip length to the Upper School Campus from which the students would be driving home without the Project (12.9 miles) and the average trip length to the Project Site from which the students would be driving home with the Project (12.9 miles). These distances were estimated using a weighted average trip length based on a trip distribution by zip code to the Upper School Campus and the trip length from each zip code to the Project Site. The trip distribution by zip code was developed using zip code data provided by Harvard-Westlake School of the number of Harvard-Westlake student households in each zip code. A map showing the trip distribution by zip code can be found in Appendix A of the TA.

HW Other consists of the remaining visitors to the Project Site related to Harvard-Westlake athletic activities, including Harvard-Westlake coaches, visiting team athletes and coaches, and spectators. The average trip length was estimated as the average trip length to the Project Site (12.9 miles) similar to that for the Harvard-Westlake student population.

Employees consist of staff at the Project Site holding roles in security, custodial, landscaping, kitchen, team store, staff, athletics administration, and athletic coaches. Based on information from Harvard-Westlake, it is estimated that 49 employees would commute to and from the Project Site on a typical day. The average trip length (13.3 miles) was estimated as a weighted average trip length based on a trip distribution by zip code and the trip length from each zip code to the Project Site. The trip distribution by zip code was developed using zip code data provided by Harvard-Westlake of the subset of the existing employees that could work at the Project Site.

HW Special Events consists of the attendees at Harvard-Westlake Special Events (those that are not related to regular academic activities or athletic programs, practices, or competitions that are expected to draw more than 100 attendees) that may occur on the Project Site. The average trip length was estimated as the average trip length to the Project Site (12.9 miles), similar to that for the Harvard-Westlake student population. Conservatively, up to 27 events of up to 500 attendees and three events of up to 2,000 attendees are anticipated per year, of which 15 would be on weekdays and 15 on weekend days. Given the infrequency of the events, the annual

event attendance was averaged across academic year weekdays to estimate the daily average weekday attendance

Weddington Golf & Tennis consists of the patrons of the existing golf and tennis facility. The average trip length (5.9 miles) was estimated as a weighted average trip length based on a trip distribution by zip code and the trip length from each zip code to the Project Site. The trip distribution by zip code was developed using zip code data provided by Weddington Golf & Tennis of the number of tennis players in each zip code based on a survey conducted over the course of a week in September 2019.

(3) Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle, and pedestrian safety impacts, a review is conducted for all 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]). Project access plans are reviewed in light of commonly-accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant.[14] The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at Project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the Project Site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle and pedestrian facilities the Project driveway(s) crosses and the relative level of utilization. The analysis considers operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result.
- The physical conditions of the Project Site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The Project location or Project-related changes to the public right-of-way relative to proximity to the HIN or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

In addition, in accordance with LADOT's interim guidance on freeway safety analysis issued in May 2020, a freeway safety analysis was conducted to evaluate whether the addition of Project traffic could cause or lengthen an off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps

[14] One example of traffic engineering design standards includes, but is not limited to Section 321 of LADOT's Manual of Policies and Procedures, which provides guidance on driveway design.

and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.[15]

The interim guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. The Project is projected to add 25 or more trips to the following freeway off-ramp:

- US-101 Southbound Off-ramp and Coldwater Canyon Avenue (3:00-4:00 p.m. peak hour)

A project would result in a significant impact at such a ramp if each of the following three criteria were met:

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.
2. The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 mph.

If a potential safety issue is identified, then, to offset this potential condition, a project should consider preferred corrective measures, including TDM strategies, to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to demonstrate substantial safety benefits, not be a VMT inducing improvement, and not result in environmental issues.

(4) Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis includes emergency access associated with emergency response from the adjacent LAFD Fire Station 78. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

[15] City of Los Angeles Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 2020.

c) Project Design Features

The following Project Design Features are applicable to the Project.

TRAF-PDF-1: Construction Management Plan. Prior to the issuance of any demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- Prohibit construction worker and equipment parking on the adjacent residential streets.

TRAF-PDF-2: A flashing red warning light(s) will be installed on the southern exit driveway within the Project Site at a point located before vehicles reach Valleyheart Drive that will hold back vehicles exiting the Project Site roundabout onto Valleyheart Drive. This warning light will be activated by a remote control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from one of the two LAFD driveways on Valleyheart Drive.

TRAF-PDF-3: On days in which event attendance is expected to surpass 300 spectators, including parents and other spectators, students will not be permitted to drive to the Project Site and will be required to use the School's shuttle service. Shuttles will follow a prescribed driving route, travelling northbound on Coldwater Canyon Avenue, turning right at Moorpark Street, and turning right onto Whitsett Avenue. Spectators will park on the Project Site, and tickets and parking passes will be required to enter the Project Site. Spectators without a parking pass will be directed to park on the School's Upper Campus and ride the School-provided shuttles to the Project Site. Parking in the neighborhood will not be permitted and will be enforced by security personnel.

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

The TAG, Table 2.1-1, *City Documents that Establish Regulatory Framework*, includes a list of City plans, policies, programs, ordinances, and standards that should be consulted to help identify potential conflicts with projects undergoing CEQA review. Also, Attachment D, Plan Consistency Worksheet, of the TAG includes screening questions for determining Project applicability to relevant plans, policies, and programs, in order to assess whether the Project would preclude their implementation. The questions and responses to each screening question in Attachment D of the TAG is included in Appendix C of the TA. Upon review of Attachment D of the TAG and the responses included in Appendix C provided in the TA, the following plans, policies, and programs were determined relevant to the Project and are analyzed in this EIR section: Mobility Plan 2035, Bicycle Parking Ordinance, TDM Ordinance, Vision Zero, Plan for a Healthy Los Angeles, and Citywide Design Guidelines. Additional plans evaluated include the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, and Los Angeles River Design Guidelines. Based on the review, it was determined that there are no applicable Specific Plans since the Project Site is not located within an area governed by a Specific Plan. In addition, there are no streetscape plans near the Project Site.

The analysis below includes a consistency analysis with the plans, policies and programs determined to be applicable to the Project.

(a) Mobility Plan 2035

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. **Table IV.M-2**, *Consistency of the Project With Applicable Policies and Programs of Mobility Plan 2035*, provides determinations of whether the Project would conflict with any of the applicable policies and programs in Mobility Plan 2035. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE IV.M-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
2.1 – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** The Project would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future adaptive reuse of streets for multiple purposes, such as transit, pedestrian, and/or automobile uses.
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.	**No Conflict.** The Project Site is not part of a PED, but the Project would improve pedestrian infrastructure by providing an extensively planted, three-quarter mile long pedestrian path that would be open to the public to circumnavigate the perimeter of the Project Site. Under existing conditions, there is no pedestrian sidewalk on the east side of Bellaire Avenue adjacent to the Project Site or on the south side of Valley Spring Lane adjacent to the Project Site. The Project's publicly-accessible pedestrian path would provide for circulation in lieu of a sidewalk. The Project also proposes new pedestrian access between the Project Site and the Zev Greenway, a segment of the Los Angeles River Trail located along the southern edge of the Project Site, as well as between Coldwater Canyon Avenue and the Zev Greenway. Both of the pedestrian ramps would be ADA-accessible. Furthermore, the Project would provide new open space and recreational amenities open to the public within convenient walking distance of residential neighborhoods.
2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.	**No Conflict.** The Project proposes a roundabout for loading within the Project Site that would be accessed from the south driveway at Valleyheart Drive. Passenger loading activity would have no impact on the surrounding street network given that loading activity would occur within the Project Site.
3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** All proposed pedestrian ramps would be ADA-compliant, as well as the internal walking path on-site. In addition, the Project would provide two ADA-compliant ramps – one to provide a pedestrian connection between the Zev Greenway and Coldwater Canyon Avenue northwest of the Project Site and another between the Project Site and the Zev Greenway to improve ADA access to the Zev Greenway.
3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** Pursuant to the LAMC, the Project is required to provide 45 short-term and 23 long-term bicycle parking spaces. The Project would provide 72 short-term and 28 long-term bicycle parking spaces to promote bicycle connectivity between the Project

TABLE IV.M-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
	Site, the Los Angeles River, and the surrounding neighborhoods.
4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The Project would comply with the Citywide TDM Ordinance by providing transportation demand management and trip reduction measures as required by LAMC Section 12.26 J, Transportation Demand Management and Trip Reduction Measures. Also, the Project would provide shuttles to transport students (and, optionally, employees and spectators) between the Project Site and the Upper School Campus to reduce the vehicle trips arriving at the Project Site (see Project Design Feature PDF-TRAF-3).
4.13 – Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** Pursuant to the LAMC, the Project is required to provided 444 vehicle parking stalls. The Project proposes to provide 532 parking stalls – 503 stalls in a subterranean parking garage and 29 surface parking spaces, to facilitate on-site parking rather than parking on the adjacent residential streets. While the Project would include parking in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling and would provide more than the number of bicycle parking spaces required by LAMC. Moreover, the Project would provide a connection to the Zev Greenway, which would further broaden the multimodal network. Therefore, even though the Project's parking may exceed the minimum requirements, the Project would still be consistent with the overall intent of the Mobility Plan and this policy.
Program PK.10 – Pedestrian Improvement Incentives. Establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. **Program PL.1 - Driveway Access**. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.	**No Conflict.** The two driveways for the Project are proposed to be located on Whitsett Avenue and Valleyheart Drive in order to protect the surrounding residential streets from additional vehicle traffic and conflicts associated with the Project. To improve and incentivize pedestrian accessibility, the Project proposes a primary pedestrian entry on Whitsett Avenue near the north vehicle entrance driveway for users and visitors arriving on foot, bicycle, or public transportation. An additional pedestrian entrance gate would be located along Whitsett Avenue at the southern Project Site boundary, just north of LAFD Fire Station 78. Five additional exterior pedestrian entrance gates would be located along the Project Site perimeter: a pedestrian entry gate located along Valley Spring Lane near the corner of Whitsett Avenue; three additional pedestrian entry gates on Valley Spring Lane opposite Teesdale, Beeman, and

TABLE IV.M-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
	Babcock Avenues, respectively; and one exterior pedestrian entrance gate to the Project Site from the Zev Greenway. By improving and retrofitting the existing sidewalks and entryways serving the Project Site and the Zev Greenway, the Project would provide safer and more pedestrian access options, thus incentivizing pedestrian usage.

SOURCE: ESA, 2021.

Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

(b) Bicycle Parking Ordinance

With regard to bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for short-term and long-term bicycle parking for auditoriums based on the number of fixed seats (1 short-term bicycle space for every 50 fixed seats and 1 long-term bicycle space for every 100 fixed seats). The multipurpose gymnasium, the tennis courts, Field A, Field B, and the pool would have a combined number of 2,217 fixed seats. As such, the Project is required by the LAMC to provide 45 short-term bicycle spaces and 23 long-term bicycle spaces. The Project would provide 72 short-term and 28 long-term bicycle parking spaces to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods.

(c) TDM Ordinance

Section 12.26 J, Transportation Demand Management and Trip Reduction Measures, of the LAMC includes TDM measures applicable to the construction of new non-residential gross floor area. Per Section 12.21 J, TDM measures are required based on the size of a project's proposed gross floor area. Projects with development in excess of 50,000 square feet gross floor area are required, by way of a covenant that runs with the land, to provide and maintain in a state of good repair the following applicable transportation demand management and trip reduction measures:

- Provide a bulletin board, display case or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. This would include transit routes and schedules, phone numbers for referrals on transportation information, ridesharing promotion material, bike route and facility information, and list of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

- A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area would include at least 10 percent of the parking spaces required for the Project Site. The spaces would be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area would be identified on the driveway and circulation plan upon application for a building permit;
- One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area;
- Parking spaces clearly identified (signed and striped) would be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;
- No signed and striped parking spaces for carpool/vanpool parking would displace any handicapped parking;
- A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces would be included on the required transportation information board;
- Minimum vertical clearance of 7 feet-2 inches would be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;
- Bicycle parking would be provided in conformance with LAMC Section 12.21 A.16.

Consistent with the requirements of LAMC Section 12.21 J, the Project would provide the above TDM and trip reduction measures, as applicable to the Project.

(d) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

As previously stated, the Project is located in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area. **Table IV.M-3**, *Consistency of the Project With Applicable Policies and Programs of the Community Plan*, provides determinations of whether the Project would conflict with any of the applicable policies and programs in the Community Plan. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE IV.M-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE COMMUNITY PLAN

Goal/Objective/Policy	Would the Project Conflict?
Chapter III, Land Use Plan Policies and Programs	
Policy 4-1.2: Increase accessibility to The Los Angeles River.	**No Conflict.** The Project would develop new pedestrian access between the Project Site and the Zev Greenway, which is a segment of the Los Angeles River Trail located along the southern edge of the Project Site. In addition, the Project is proposing a pedestrian ramp to connect the Zev Greenway to Coldwater Canyon Avenue.
Goal 11: Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicular trips. **Objective 11-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips. **Policy 11-1.1:** Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, walking, bicycles, etc.). **Policy 11-1.3:** Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** The Project would comply with the Citywide TDM Ordinance by providing transportation demand management and trip reduction measures as required by LAMC Section 12.26 J, Transportation Demand Management and Trip Reduction Measures (see list of requirements under TDM Ordinance analysis, above). Also, the Project would be providing shuttles to transport students (and, optionally, employees and spectators) between the Project Site and the School's Upper Campus to reduce the vehicle trips arriving at the Project Site (see Project Design Feature PDF-TRAF-3). In addition, the Project would be providing 72 short-term and 28 long-term bicycle spaces, exceeding LAMC requirements, to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods.
Goal 13: To the extent feasible and consistent with the Mobility Plan 2035's and community plans' policies promoting multi-modal transportation and safety, a system of freeways, and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining a desired level of service at intersections. **Objective 13-1:** To the extent feasible and consistent with the Mobility Plan's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure [*sic*] that necessary road access and street improvements are provided to accommodate traffic generated by new development.	**No Conflict.** The Project would not preclude the improvement of the streets that are listed in the program under this policy in the Community Plan. The Mobility Plan designates street classifications and required cross-sections to maintain Citywide performance standards on City streets. The Mobility Plan designates Whitsett Avenue, along the Project frontage, as an Avenue II, which is required to have a right-of-way (ROW) width of 86 feet and roadway width of 56 feet. The Project does not propose any changes to the roadway that would preclude the City from maintaining this cross-section. Therefore, it is anticipated that the roadways would be consistent with the Community Plan and the Mobility Plan and would accommodate traffic generated by new development.

TABLE IV.M-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE COMMUNITY PLAN

Goal/Objective/Policy	Would the Project Conflict?
Policy 13-1.3: Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures.	**No Conflict.** The Project discourages non-residential traffic flow on Valley Spring Lane and Bellaire Avenue by not providing vehicular access to the Project Site from those streets. In addition, shuttle routes would not be along local residential streets, and the preferred driving route for other cars would be communicated by Harvard-Westlake to Project Site visitors including employees, visiting teams and coaches, referees, spectators and parents, vendors, and attendees at HW Special Events. In addition to direct communication with individuals from the aforementioned groups, the School would post the preferred driving route on the School's website.
Policy 13-1.4: New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.	**No Conflict.** The Project would replace two existing driveways on Whitsett Avenue with one new driveway directly on Whitsett Avenue. The Project would also provide shuttle buses to transport students between the Project Site and the Upper School campus, which would reduce the number of vehicles utilizing these accesses on Whitsett Avenue.
Policy 13-2.2: Driveway access points onto arterial and collector streets should be limited in number and be located to insure the smooth and safe flow of vehicles and bicycles.	**No Conflict.** The Project would replace two existing driveways on Whitsett Avenue with one new driveway directly on Whitsett Avenue and thus does not propose more driveways than allowed by the City's maximum standard and reduces the curb cuts on Whitsett Avenue from two to one. The second driveway would be on Valleyheart Drive, which is not an arterial or collector. The Project would also eliminate the service entrance driveway on Valley Spring Lane.
Goal 14: A system of safe, efficient, and attractive bicycle, pedestrian and equestrian facilities. **Objective 14-1:** To promote an adequate system of safe bikeways for commuter, school, and recreational use.	**No Conflict.** The Project Site frontages are across the river from the Los Angeles River Bicycle Path, which is part of the BEN. The Project proposes new pedestrian access between the Project Site and the Zev Greenway, which are linked to the Los Angeles River Bicycle Path near the intersection of the Zev Greenway and Coldwater Canyon Avenue northwest of the Project Site.
Policy 14-1.1: Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City.	The Project would provide 100 bicycle parking spaces to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods. Showers and changing rooms would be available in the locker rooms for Harvard-Westlake students.

TABLE IV.M-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE COMMUNITY PLAN

Goal/Objective/Policy	Would the Project Conflict?
Policy 14-1.2: Encourage the provision of showers, changing rooms, and bicycle storage at new and existing non-residential developments and public places.	
Goal 15: A sufficient system of well designed and convenient on-street parking and off-street parking facilities throughout the Plan Area. Objective 15-1: To provide parking in appropriate locations in accord with Citywide standards and community needs. **Policy 15-1.1:** Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials. Policy 15-1.3: New parking lots and new parking garages shall be developed in accordance with design standards.	**No Conflict.** The Project proposes one primary parking structure to consolidate the parking. It would replace two existing driveways on Whitsett Avenue with one new driveway directly on Whitsett Avenue, which would minimize the number of ingress and egress points (curb cuts) onto Whitsett Avenue. The Project would provide a total of 532 vehicle parking spaces, with 503 spaces within a single-level underground parking structure and 29 spaces on the surface parking area. The Project supports this policy by locating the surface parking at the rear, south side of the Project Site and the parking structure underground. The surface parking would be developed in accordance with applicable design standards.
Chapter V, Urban Design	
Public Open Space and Plazas: Establish public open space standards that will guide the design of new public plazas and open spaces, which should include 1) Consideration of the siting of open space to maximize pedestrian accessibility and circulation, 2) Solar exposure or protection, 3) Adjacency to pedestrian routes and other open spaces, 4) Appropriate plant and hard scape materials.	**No Conflict.** While not in the public right-of-way, the Project would provide 5.4 acres of publicly-accessible open space and a three-quarter mile long pedestrian path that would be open to the public to circumnavigate the perimeter of the Project Site. The Project also proposes new pedestrian access to the Zev Greenway as well as between Coldwater Canyon Avenue and the Zev Greenway for casual exercise by individuals or families. In addition, the Project would implement an extensive tree and landscaping program, resulting in a net increase of 110 trees as compared to existing conditions.

SOURCE: ESA, 2021.

(e) LADOT Manual of Policies and Procedures

The LADOT MPP, Section 321, Driveway Design, includes driveway design standards to minimize adverse effects on street traffic. The Project is on a corner lot, as it occupies almost the entire block bound by Whitsett Avenue, Valley Spring Lane, Bellaire Avenue, and the Los Angeles River.

MPP 321 states that on arterial highways, such as Whitsett Avenue, serving lots with frontages greater than 250 feet driveways should not be placed within 150 feet of the adjacent street. The Project proposes two driveways. The north driveway on Whitsett Avenue is more than 150 feet away from the closest intersection at Valley Spring Lane to the north. The south driveway on Valleyheart Drive that leads to Whitsett Avenue is more than 150 feet away from the closest intersection at Ventura Court to the south. MPP 321 also allows up to two driveways for up to 400 feet of frontage. The Project proposes two driveways and therefore does not propose more driveways than allowed by MPP 321.

MPP Section 321 also recommends that two-way driveways for commercial/industrial/multi-family residential developments be no wider than 30 feet in width. The proposed driveways would not comply with the City's applicable requirements as the north driveway is proposed to be 39 feet wide and the south driveway is proposed to be 33 feet wide. However, the Project would reduce the number of driveways on Whitsett Avenue from two to one (the south driveway is considered an extension of Valleyheart Drive, which is an existing street), which would overall be a benefit since there would be reduced potential driveway conflicts between vehicles and pedestrians. The north driveway would be wider than the recommended 30 feet to permit provision of a median island on the driveway configured to restrict turns into and out of the driveway to right-turns only, and to enhance safety by minimizing conflicts. Additionally, the south driveway is the extension of a public street, Valleyheart Drive, which is currently 33 feet wide. Therefore, while the Project would not be consistent with this recommendation in MPP Section 321, the inconsistency would not result in increased circulation, pedestrian or vehicular conflicts.

(f) Vision Zero

Vision Zero is a plan that strives to eliminate traffic-related deaths in Los Angeles by 2025 through strategies, such as modifying streets to better serve vulnerable road users. Projects located in the HIN should make improvements or fund them. The Project's frontages are not along streets in the Vision Zero network. The Project frontages are not along streets that are on the HIN, and, therefore, the Project would not preclude or conflict with the implementation of future Vision Zero projects in on the HIN.

(g) Plan for a Healthy Los Angeles

The Project supports the transportation-related goals listed in Plan for a Healthy Los Angeles. The Project is designed such that it would improve pedestrian infrastructure by providing an extensively planted, three-quarter mile long internal pedestrian path that would be open to the public to circumnavigate the perimeter of the Project Site. The pedestrian path would run parallel to Bellaire Avenue and Valley Spring Lane, where no current sidewalks exist. The Project proposes a primary pedestrian entry on Whitsett Avenue near the north vehicle entrance driveway for users and visitors arriving on foot, bicycle or public transportation. An additional pedestrian entrance gate would be located along Whitsett Avenue at the southern Project Site boundary, just north of LAFD Fire Station 78. Six additional exterior pedestrian entrance gates would be located along the Project Site

perimeter: a pedestrian entry gate located along Valley Spring Lane near the corner of Whitsett Avenue; three additional pedestrian entry gates on Valley Spring Lane opposite Teesdale, Beeman, and Babcock Avenues, respectively; one exterior pedestrian entrance gate at Bellaire Avenue and Valleyheart Drive; and one exterior pedestrian entrance gate to the Project Site from the Zev Greenway. In total, there would be eight pedestrian entry gates along the perimeter of the Project Site that would provide access to the three-quarter mile path and 5.4 acres of landscaped areas. However, access to the interior of the Project Site and its recreational facilities would only be via the primary pedestrian entrance on Whitsett Avenue, south of the clubhouse. The Project also proposes new pedestrian access ramps between the Project Site and the Zev Greenway, as well as between Coldwater Canyon Avenue and the Zev Greenway. Both of the pedestrian ramps would be ADA-accessible. The new entryways and pedestrian access ramps under the Project would increase recreational opportunities and landscaped open space accessibility for the Project's users and nearby community. The Project would also facilitate bicycle access and provide on-site bicycle parking, which would facilitate a reduction in vehicle trips, VMT, and GHG emissions. Thus, the Project would not conflict with, limit, or preclude the City's ability to implement programs and policies in furtherance of Plan for a Healthy Los Angeles.

(h) Citywide Design Guidelines

The Citywide Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The design guidelines are organized around Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Guideline 1 recommends promoting a safe, comfortable and accessible pedestrian experience for all. Guideline 2 of the Citywide Design Guidelines recommends carefully incorporating vehicle access such that it does not degrade the pedestrian experience, in accordance with the Site Planning Best Practices. 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. Guideline 3 recommends to design projects to actively engage with streets and public space and maintain human scale.

Consistent with Guideline 1, the Project would promote a safe, comfortable and accessible pedestrian experience for all, with the Project prioritizing pedestrian access first. The Project proposes a primary pedestrian entry on Whitsett Avenue near the north vehicle entrance driveways for users and visitors arriving on foot, bicycle, or public transportation. An additional pedestrian entrance gate would be located along Whitsett Avenue, just north of LAFD Fire Station 78. Six additional exterior pedestrian entrance gates would be located along the Project Site perimeter: a pedestrian entry gate located along Valley Spring Lane near the corner of Whitsett Avenue; three additional pedestrian entry gates on Valley Spring Lane opposite Teesdale, Beeman, and Babcock Avenues, respectively; one exterior pedestrian entrance gate at Bellaire Avenue and Valleyheart

Drive; and one exterior pedestrian entrance gate to the Project Site from the Zev Greenway. In total, there would be eight (8) pedestrian entry gates along the perimeter of the Project Site. The Project also proposes new pedestrian access ramps between the Project Site and the Zev Greenway, as well as between Coldwater Canyon Avenue and the Zev Greenway. Both of the pedestrian ramps would be ADA-accessible. With its numerous pedestrian access points along the Project Site perimeter and public access to on-site trails, the Project would not degrade the pedestrian experience (Guideline 2), and would actively engage with streets and public space and maintain human scale (Guideline 3).

The Project would reduce the number of existing driveways on the Project Site from four to two, which would reduce potential driveway conflicts between vehicles and pedestrians. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. This would be consistent with Guideline 2 to carefully incorporate vehicle access such that it does not degrade the pedestrian experience. The driveway on Valleyheart Drive would lead to a passenger drop-off/pick-up roundabout area at the southeast corner of the Project Site that has been designed to accommodate buses, shuttles, and automobiles. The passenger drop-off/pick-up roundabout area would provide a safe place for pedestrian drop-off/pick-up to occur within the Project Site. Therefore, the drop-off zones are within the Project Site and would not interfere with public right-of-way, consistent with Guideline 2 as well.

Based on the above, the Project would not conflict with the Citywide Design Guidelines.

(i) Los Angeles River Design Guidelines

The Los Angeles River Design Guidelines highlight best practices for designing development projects to increase awareness of, and access to, the Los Angeles River. The provisions in the guidelines identify the desired level of design quality for all developments within the RIO District and projects within the RIO District are encouraged to incorporate these guidelines and best practices into the project's design.

Table IV.M-4, *Consistency of the Project with Applicable Strategies of the Los Angeles River Design Guidelines*, provides determinations of whether the Project would conflict with any of the applicable strategies in the Los Angeles River Design Guidelines. As shown therein, the Project would not conflict with any of the applicable strategies.

TABLE IV.M-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE OBJECTIVES OF THE LOS ANGELES RIVER DESIGN GUIDELINES

Strategy	Would the Project Conflict?
Strategy 1-1: Incorporate passageways or paseos into mid-block developments adjacent to the river, to facilitate pedestrian access to the river greenway, such that pedestrians and bicyclists will not need to walk or ride the perimeter of a block in order to access the river.	**No Conflict.** The Project would facilitate pedestrian access to the river greenway by including a new pedestrian access between the Project Site and the Zev Greenway. In addition, the Project would provide a pedestrian ramp to connect the Zev Greenway to Coldwater Canyon Avenue.
Strategy 1-2: Activate the passageway or paseo so that they are safe and visually interesting spaces, using recycled water features, pedestrian-level lighting, artwork, benches, landscape or special paving.	**No Conflict.** The Project would activate the new pedestrian connection to the Zev Greenway to be safe, accessible and interesting by providing landscaping along the path. The path would also connect to the landscaped areas on the Project Site, which would have water features, benches, wooded areas, and natural spaces open to the public. In addition, the Project would provide a pedestrian ramp to connect the Zev Greenway to Coldwater Canyon Avenue.
Strategy 1-6: Promote pedestrian connectivity from the river by placing publicly accessible entrances at grade level or slightly above, and unobstructed from view from the river corridor. Avoid sunken entryways below the level of the adjacent river pathways.	**No Conflict.** The Project Site is higher in elevation compared to the Zev Greenway and would be ADA-accessible via the new pedestrian path/ramp. Views of the river corridor would be available from pedestrian paths and other areas on the Project Site.
Strategy 1-8: Provide bicycle lockers and/or racks near river-facing building entrances.	**No Conflict.** The Project would provide 100 bicycle parking spaces on the Project Site, including some near the new pedestrian path to the Zev Greenway.
Strategy 4-1: Place on-site parking so that it does not dominate the river corridor.	**No Conflict.** The Project would provide an underground parking structure, which would not be visible from the river corridor. Twenty-nine (29) parking spaces would be provided at-grade but would not be directly adjacent to or visible from the Zev Greenway and, thus, would not dominate the river corridor.
Strategy 4-2: Locate loading facilities so that docks and doors do not dominate the river frontage and are screened from the river.	**No Conflict.** Loading activity for the Project would occur in the surface parking area, which would be accessed via the new roundabout at the end of Valleyheart Drive. This area would be obscured by the landscaping and would not be visible from the river corridor.

TABLE IV.M-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE OBJECTIVES OF THE LOS ANGELES RIVER DESIGN GUIDELINES

Strategy	Would the Project Conflict?
Strategy 4-3: Situate loading areas so as not to interfere with on-site pedestrian and bicycle circulation to and from the river corridor. When feasible, separate loading areas from areas that are used for public entrances.	**No Conflict.** The new roundabout at the end of Valleyheart Drive and the surface parking area, where loading at the Project Site would occur, is located in a different location from the new pedestrian path to the Zev Greenway, and, thus, while some individuals may still choose to walk through the roundabout to connect to the new pedestrian path, on the whole, it would not interfere with pedestrian and bicycle circulation to and from the river corridor.
Strategy 4-4: Encourage shared parking agreements to minimize the amount of area dedicated to parking.	**No Conflict.** The on-site parking spaces on the Project Site would be shared between the Harvard-Westlake athletic activities and the community use of the facilities. In addition, the Project would implement a shuttle system to transport Harvard-Westlake students (as well as, optionally, employees and spectators) to and from the Upper School, which would minimize the need for parking spaces on the Project Site. Lastly, by placing most of the parking spaces below grade, the Project preserves the vast majority of the Project Site for non-vehicular uses.
Strategy 5-1: Design cul-de-sacs, street ends, vacated streets, and remnant streets widths to provide pocket parks which can serve as gateways to the river while also assisting in the treatment and infiltration of stormwater as well as dry-weather run-off.	**No Conflict.** The Project is proposing a new roundabout at the end of Valleyheart Drive, which would be separate from the pedestrian access to the Zev Greenway. Otherwise, the Project is not designing a cul-de-sac, street end, vacated street, remnant street or pocket park that would serve a gateway to the river. Nonetheless, the Project includes an underground stormwater capture, treatment, and reuse system on the Project Site. The Project would capture and treat surface water runoff from the Whitsett Avenue/Valley Spring Lane intersection and throughout the Project Site. Runoff would be stored in a one-million-gallon underground tank and filtered prior to use as on-site irrigation or released into the in-street storm system (during periods of heavy rainfall when onsite stored capacity has been reached). Such storage and filtering would improve water quality and reduce the rate of runoff during storm events.
Strategy 5-2: Design parkways and traffic circles to assist in the treatment and infiltration of stormwater as well as dry-weather run-off.	**No Conflict.** See discussion for Strategy 5-1.

SOURCE: ESA, 2021.

Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Therefore, impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As explained in *Methodology*, above, the Project's total daily VMT was calculated by multiplying the estimated average number of daily trips by an average trip length for each group of users of the site. For this Project, there are different populations that would make trips to and from the Project Site, including Harvard-Westlake students, visiting teams, spectators, and employees. In addition, trips generated by potential Harvard-Westlake Special Events (which are defined as events that are not related to regular academic activities or athletic programs, practices, or competitions that are expected to draw more than 100 attendees, including conferences, admission events, and parent meetings) at the Project Site were averaged across the academic year. Finally, the net total VMT takes credit for existing VMT associated with the existing Weddington Golf & Tennis, as the VMT for these trips would be eliminated with the Project. The Project's net total daily VMT is provided in **Table IV.M-5**, *Project Net Total Daily VMT Estimate*.

As shown in Table IV.M-4, the Project would generate an estimated total daily VMT of 3,932. However, when taking into account the existing uses, which would be eliminated, the Project would generate an estimated net decrease of 2,098 daily VMT. **Therefore, as the Project would result in a net decrease in daily VMT, the Project would have a less-than-significant impact on VMT.**

TABLE IV.M-5
PROJECT NET TOTAL DAILY VMT ESTIMATE

Population Group	Average Daily Trip Generation	Average One-Way Trip Length (miles)	Daily VMT
Project			
HW Shuttles	58	1.5	87
HW Private Vehicles[a]	43 (inbound)	1.5 (inbound)	65
HW Other	132	12.9	1,703
Employees	98	13.3	1,303
HW Events	60[b]	12.9	774
Total Daily VMT			*3,932*
Existing Use Credit			
Weddington Golf & Tennis	1,022	5.9	6,030
Net Total Daily VMT			**-2,098**

[a] Only the inbound trips are included in the VMT estimate for the HW private vehicles because the outbound trip lengths were found to be the same as the existing outbound trip lengths for student vehicles leaving the Upper School to return home.

[b] Annual event trips averaged across academic year weekdays.

SOURCE: Fehr & Peers, TA, 2021.

(2) Mitigation Measures

Impacts related to VMT were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Local Safety

As discussed in the Initial Study (Appendix A of this Draft EIR), impacts regarding geometric hazards were determined to be less than significant. Public comments raised in response to the Notice of Preparation (NOP) included concerns about the number and location of driveways. As such, supplemental information and analysis of impacts

regarding geometric hazards is included below. Emergency access related to LAFD Fire Station 78 is addressed under Threshold (d), below.

The roadways adjacent to the Project Site are part of an established urban roadway network and contain no sharp curves or dangerous intersections. Pedestrian access to the pathway that circumnavigates the Project Site would be provided via four entry gates along Valley Spring Lane; one entry gate along Bellaire Avenue, two entry gates along Whitsett Avenue, and one exterior pedestrian entrance gate to the Project Site from the Zev Greenway. The primary pedestrian entry to the Project Site's interior and its athletic amenities would be accessed via the sidewalk along the east side of the Project Site on Whitsett Avenue. The pedestrian entry gates to be located along Valley Spring Lane currently do not have sidewalks along the Project frontage. The Project's three-quarter mile long pedestrian path would run parallel to Valley Spring Lane and Bellaire Avenue, and would effectively serve as the pedestrian circulation along streets where there is currently no sidewalk. This pedestrian path would also create a new connection to the Zev Greenway.

Students, visitors, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project's access locations would be designed to City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways would intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets and transit stops.

There are two driveways proposed as part of the Project, one of which (north driveway) would be on Whitsett Avenue, an arterial facility, several hundred feet south of Valley Spring Lane. The other driveway (south driveway) would be an extension of Valleyheart Drive, which intersects with Whitsett Avenue just south of LAFD Station 78. Refer to the analysis under Threshold (d) for a discussion of access to LAFD Station 78 by LAFD vehicles. Access to the subterranean parking structure would be provided via both the north and south driveways. The south driveway would also lead to a roundabout area for passenger loading and serve as access to the surface parking area. The south driveway would only allow entry into the subterranean garage, and all exits from the garage would be via the north driveway. The north parking structure driveway would be flat for at least 25 feet within the Project Site before it intersects with the Whitsett Avenue sidewalk, per the site plan. To reduce conflicts and enhance safety, a triangular median island would be provided on the north driveway configured to restrict turns into and out of the driveway to right-turns only. No new driveways would be installed along Valley Spring Lane or Bellaire Avenue, and the existing service driveway on Valley Spring Lane would be removed, thus eliminating an existing potential conflict location.

The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. Also, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site and in the Project vicinity. Pedestrians and bicycles would have separate entrances to the Project Site from vehicular driveways. The Project driveways would not be located along a street that is part of the designated HIN and the Project is not located in a Safe Routes to School program area. Also, there are no existing or planned bicycle facilities along Whitsett Avenue. The counts collected at Whitsett Avenue and Valley Spring Lane and Whitsett Avenue and Ventura Boulevard show 2 bicyclists and 6 bicyclists in the PM peak period, respectively. Given that the entry for bicyclists is separated from vehicular driveways, the location of the driveways is not expected to contribute to an increase in hazards for this factor. Overall, the Project would not substantially increase hazards, conflicts, and would contribute to overall walkability and bike-ability through enhancements to the Project Site.

Based on the above, the Project would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on local safety would be less than significant. As such, no further analysis is required.

(b) Freeway Safety

As noted previously, the interim guidance on freeway safety analysis requires freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. The Project is projected to add 25 or more trips to the following freeway off-ramp:

- US-101 Southbound Off-ramp to Coldwater Canyon Avenue (3:00-4:00 p.m. peak hour)

For the identified freeway off-ramp, a queuing study was conducted for the “Future with Project” condition for the Project buildout year (2025) using trip generation and future traffic volumes. As further detailed in Table 5 of the TA, the maximum ramp length is 800 feet. The queue length on the US-101 Southbound Off-ramp to Coldwater Canyon Avenue is projected to be a maximum of 177 feet for both the Future Base and Future plus Project scenarios during the 3:00-4:00 p.m. peak hour and, therefore, is not projected to exceed ramp capacity. Although the Project is projected to add one car length (assuming an average queue storage length of 25 feet per car) to the queue in the 3:00-4:00 p.m. peak hour, the addition would not exceed the maximum ramp length of 800 feet and is, therefore, not projected to exceed the ramp storage in the 3:00-4:00 p.m. peak hour. Therefore, the Project is not projected to have a significant safety impact for the US-101 Southbound off-ramp to Coldwater Canyon Avenue.

Based on the above, the Project would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be less than significant.

(2) Mitigation Measures

Impacts related to hazardous design features were determined to be less than significant; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to hazardous design features were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction

The Project would include temporary construction activities (e.g., temporary lane closures, etc.) and generate construction traffic that could potentially affect emergency access to the Project Site and surroundings. As stated in the TA, the Project would not require construction activities that would take place within the right-of-way, which would necessitate temporary lane, alley, or street closures for more than a day at a time. Furthermore, emergency access would be maintained at all times as no road closures would be necessary. However, while construction activities would not require full street closures (i.e., at least one travel lane would be open at all times) and most Project construction activities would be confined to the Project Site, the Project would still implement a CMP (see Project Design Feature TRAF-PDF-1). Because of the short-term nature of the construction activities and with implementation of a CMP, the Project's construction activities would not require a new, or significantly interfere with an existing, risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction.

(b) Operation

The Project Site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation, including the adjacent Valley Spring Lane and Whitsett Avenue. All emergency vehicles, including fire trucks/engines, could enter the Project Site via a driveway at the paved portion of Valleyheart Drive located just south of LAFD Fire Station 78. Smaller emergency vehicles, such as ambulances and patrol cars, could also access the Project Site via the north driveway leading to the parking garage.

Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project

Site and in the Project vicinity. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As discussed in Section IV.L.1, *Fire Protection*, impacts to these services from Project implementation would be less than significant. In addition, as discussed in Section IV.H, *Hazards and Hazardous Materials*, none of the streets adjacent to the Project Site are a City-designated disaster route.

As indicated above, LAFD Station 78 is located on the north side of Valleyheart Drive, which serves as access for the Project's southern driveway. As part of the Project design and per Project Design Feature TRAF-PDF-2, a flashing red warning light(s) will be installed on the southern exit driveway within the Project Site at a point located before vehicles reach Valleyheart Drive that will hold back vehicles exiting the Project Site roundabout onto Valleyheart Drive. This warning light will be activated by a remote control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from one of the LAFD driveways on Valleyheart Drive. The warning light would allow for adequate emergency access by LAFD vehicles between Valleyheart Drive and Whitsett Avenue by reducing conflicts between vehicles leaving the Project Site and emergency vehicles leaving/coming back to the station. Further, the warning light would minimize the eastbound queues by vehicles leaving the Project Site along Valleyheart Drive at Whitsett Avenue when emergency vehicles need to access Valleyheart Drive. With the warning light in operation, LAFD would be able to effectively maintain adequate emergency vehicle access to the fire station. Also, the Project would include an at-grade security kiosk located near the roundabout, thereby placing a security guard nearby to assist with traffic management when the warning light is activated. Finally, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all emergency vehicle safety requirements (including those related to emergency access) are met.

No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. Finally, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all emergency vehicle safety requirements (including those related to emergency access) are met. For these reasons, the Project would not result in inadequate emergency access.

Based on the above, Project impacts with respect to emergency access would be less than significant.

(2) Mitigation Measures

Impacts related to emergency access were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

Figure III-1, Related Projects Map, in Chapter III, *Environmental Setting*, is an area map showing the location of the Project and related land use development projects to be evaluated under the cumulative conditions. Based on information provided by LADOT on October 27, 2020 and other sources, there are five mixed-use related projects, including health club, restaurant, retail, and residential land uses. All of these projects are located on Ventura Boulevard. Table III-1, Related Projects List, in Chapter III shows the list of related projects and their corresponding land uses.

The five related projects are located south of the Project Site along Ventura Boulevard. Each of the related projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for consistency with applicable policies. Collectively, the Project and the related projects would add development and density in an area with transit options and high levels of pedestrian activity. Therefore, the Project, in combination with the related projects, would not create inconsistencies or result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

As the Project would result in a less-than-significant impact on VMT due to a decrease in VMT for the Project Site, and, therefore would be consistent with the 2020-2045 RTP/SCS VMT reduction goals, the Project would similarly result in a less-than-significant impact on VMT in cumulative conditions, and further analysis is not necessary.

With regard to design hazards, the Project would not result in a significant impact for local or freeway safety. The freeway safety analysis for the Project included traffic conditions for buildout year 2025, which included traffic from the related projects. Further, each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable.

As indicated above, the five related projects are located on Ventura Boulevard. Therefore, the related projects would not share adjacent street frontages with the Project Site, and the preferred driving route to the Project Site is not along Ventura Boulevard. The emergency access points to/from these related projects would not have a cumulative impact in conjunction with the Project's emergency access points, given the physical distance from the Project Site. Furthermore, each related Project would have its own CMP during construction activities. Implementation of the CMPs would ensure that if there are overlapping construction activities for the related projects, that measures would be put in place to ensure adequate emergency access is maintained on the local roadway network at all times. Thus, the Project's contribution to cumulative impacts associated with emergency access during construction would not be considerable.

Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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