IV.F TRANSPORTATION

1. Introduction

This section evaluates potential temporary impacts that could result from the Project's construction activities, including impacts related to temporary transportation constraints, temporary loss of access, and temporary loss of bus stops or rerouting of bus lines. This section is based on information provided in Appendix E-1 of this Draft EIR, which includes the Construction Assessment for 11973 San Vicente Boulevard, Los Angeles, California, Memorandum (Construction Memo), prepared by Gibson Transportation Consulting, Inc., October 21, 2021. This memorandum was prepared in accordance with Section 3.4 of the Los Angeles Department of Transportation's (LADOT) *Transportation Assessment Guidelines* (TAG). The Construction Memo was approved by LADOT on November 29, 2021. A copy of LADOT's Assessment Letter is included as Appendix E-2 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
- City of Los Angeles Mobility Plan 2035
- Brentwood – Pacific Palisades Community Plan
- West Los Angeles Transportation Improvement and Mitigation Specific Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for a Healthy Los Angeles

(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 and Senate Bill 375

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

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of 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: CARB'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 miles of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

(c) California Vehicle Code

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

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for

particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (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* 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 miles of either an existing major transit stop[1] or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.[2] Projects that decrease VMT in the project site 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

[1] "Major transit stop" is defined in Public Resources Code Section 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.

[2] "High-quality transit corridors" are defined in Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

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 one half mile of an existing or 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 half mile 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 the 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.[3] 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 the following five main goals that define the City's high-level mobility priorities:

(1) Safety First;
(2) World Class Infrastructure;
(3) Access for All Angelenos;
(4) Collaboration, Communication, and Informed Choices; and
(5) Clean Environments and Healthy Communities.

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

Street classifications are designated in the Mobility Plan and may be amended by a Community Plan. The classifications 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.

[3] 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.

- 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) Brentwood – Pacific Palisades 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 Brentwood – Pacific Palisades Community Plan area. The community plan does not include any transportation and circulation objectives that are applicable to the Project.

(c) West Los Angeles Transportation Improvement and Mitigation Specific Plan

The Project Site is located within the boundaries of the West LA Transportation Improvement and Mitigation Specific Plan (TIMP), which is intended to provide a mechanism to fund transportation improvements due to transportation impacts generated by new development within the TIMP Area. The plan specifies requirements for the issuance of building permits for properties in the West Los Angeles area including the Brentwood-Pacific Palisades area and establishes a fee process for new development in the C, M, and P zones.

(d) 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.

(e) 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 Mobility Plan 2035. 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.[4]

(f) 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.

(g) 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.

(h) 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

[4] Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, July 2020, included in Appendix E-3 of this Draft EIR.

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 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.

(i) 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.

(j) 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.[5] 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.

b) Existing Conditions

The Project Site falls within the boundaries of the Brentwood-Pacific Palisades Community Plan, the San Vicente Scenic Corridor Specific Plan, and the West Los Angeles Transportation Improvement and Mitigation Specific Plan. The Project Site is located approximately one mile west of the San Diego Freeway (I-405).

Striped bicycle lanes are currently provided along San Vicente Boulevard adjacent to the Project Site. The Mobility Plan identifies San Vicente Boulevard as a designated Avenue II. San Vicente Boulevard has also been identified in the Mobility Plan as part of the Bicycle Enhanced Network and Pedestrian Enhanced District, as well as part of the Vision Zero Action Plan High Injury Network. San Vicente Boulevard adjacent to the Project Site is included in the Safe Route to School for the nearby Brentwood Science Magnet school.

The Project Site is developed with a two-story, approximately 23.5-foot tall, approximately 13,956 square foot commercial office building (the Barry Building) and a portion of the surface parking

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

located immediately north of the building. A 16.5-foot-wide driveway is located on the eastern portion of the Project Site and provides ingress/egress vehicular access to the Project Site.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), a project would have a significant impact related to transportation if the project would do the following:

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

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

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

Threshold (d) Result in inadequate emergency access.

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

b) Methodology

The analysis presented in this section relates to the temporary constraints that could result from the demolition activities associated with the Project and was performed in accordance with Section 3.4 of the TAG. Section 3.4.3 of the TAG identifies the following three types of in-street demolition constraints that require further analysis to assess the effects of Project demolition on the existing pedestrian, bicycle, transit, or vehicle circulation:

1. Temporary transportation constraints – potential effects on the transportation system that could also affect emergency access.

2. Temporary loss of access – potential effects on visitors entering and leaving sites.

3. Temporary loss of bus stops or rerouting of bus lines – potential effects on bus travelers.

The factors to be considered include the magnitude and duration of the temporary loss of access and transportation facilities, the potential inconvenience caused to users of the transportation system, and consideration for public safety. Demolition activities could potentially interfere with pedestrian, bicycle, transit, or vehicle circulation and accessibility to adjoining areas. As detailed in Section 3.4.4 of the TAG, the proposed demolition plans should be reviewed to determine whether demolition activities would require any of the following actions within the public right of way:

- Street, sidewalk, or lane closures
- Block existing vehicle, bicycle, or pedestrian access along a street or to parcels fronting the street
- Modification of access to transit stations, stops, or facilities during revenue hours
- Closure or movement of an existing bus stop or rerouting of an existing bus line
- Creation of transportation hazards

c) Project Design Features

The Project would include the following Project Design Feature (PDF):

PDF-TRA-1 Demolition Management Plan

The Project Applicant shall prepare a detailed Demolition Management Plan that includes potential street/lane closure information, a detour plan, and a staging plan. The Demolition Management Plan shall be submitted to the City for review and approval, prior to commencing demolition. The Demolition Management Plan would formalize how demolition would be carried out and identify specific actions that would be required to reduce effects on the transportation. The Demolition Management Plan shall be based on the nature and timing of the specific demolition activities and other construction projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming demolition activities, including durations and daily hours of operation.

- Prohibition of demolition-related vehicles/equipment parking on adjacent streets.

- Temporary pedestrian, bicycle, and vehicular traffic controls during all demolition activities adjacent to San Vicente Boulevard to ensure traffic safety for all travel modes on public rights-of-way and maintain a safe pedestrian route to nearby schools. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveway.

- Provision of covered walkways where pedestrians are exposed to potential injury from falling objects.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- The sidewalk shall be kept open during demolition except when it is absolutely required to close or block sidewalk for demolition staging. Sidewalk shall be reopened as soon as reasonably feasible, taking demolition and demolition staging into account.
- Scheduling of demolition activities to reduce the effect on traffic flow on surrounding Arterial Streets.
- Containment of demolition activity within the Project Site boundaries.
- No staging or parking of demolition vehicles on any of the streets immediately adjacent to schools.
- Ongoing contact with the administrator of nearby schools during demolition and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- Haul route scheduling sequenced to minimize conflicts with pedestrians, school buses, and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past schools during periods when school is in session, especially when students are arriving or departing from the campus.
- All haul truck activity to and from the Project Site shall occur outside of the morning and afternoon commuter peak hours.

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?

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), Section 2.1.2 of LADOT's TAG provides screening criteria for this threshold. For any project requiring a discretionary approval, an affirmative answer to any of the following screening questions triggers a need to assess whether the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities:

- Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan?

- Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multi modal transportation options or public safety?

- Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb lines, etc.)?

The Project consists of the demolition of the Barry Building and the installation of a modest landscape buffer along the southern boundary of the Project Site. Since development of the Project Site is not proposed and/or considered as part of the Project, the Project does not trigger the requirement for additional review under these screening criteria. First, the only discretionary action required for the Project is related to the demolition of the existing building, which would not require the decision maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan. Second, because no future development is proposed and/or considered as part of the Project, the Project would not generate any traffic and would not conflict with any transportation plan, policy, or program adopted to support multi modal transportation options or public safety. Finally, the Project would not make any modifications to the public right-of-way. Based on LADOT's TAG, no further analysis to assess if the Project would conflict with plans, programs, ordinances, or policies is required, and impacts would not occur.

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

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), in accordance with CEQA Guidelines Section 15064.3(b), LADOT's TAG provides 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 to be evaluated based on VMT rather than LOS or any other measure of a project's effect on automobile delay. As discussed in Section 2.2.2, Screening Criteria, of the TAG, if a development project requires a discretionary approval and the answer is "no" to either of the questions below, further analysis is not warranted and a "no impact" determination can be made for this topic.

- Would the land use project generate a net increase of 250 or more daily vehicle trips?

- Would the project generate a net increase in daily VMT?

Because the Project Site would be vacant upon completion of the Project and development of the Project Site with new land uses is not proposed and/or considered as part of the Project, the Project would not result in any daily vehicle trips or net increase in daily VMT. Thus, in accordance with the TAG, further analysis for Threshold (b) is not required and a "no impact" determination can be made.

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

As discussed in the Initial Study (refer to Appendix A-1 of the Draft EIR), the Project does not include any geometric design features or incompatible uses. The demolition plans would be reviewed by the Los Angeles Department of Building and Safety (LADBS) and the Los Angeles Fire Department (LAFD) during the City's plan review process to ensure all applicable safety requirements are met. The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections. In addition, demolition of the Barry Building would not require new driveways or roadway improvements, and no safety hazards would be introduced to the existing roadway network. Once demolition activities are complete, the portion of the Project Site that currently contains the Barry Building would be a vacant dirt lot, and the existing surface parking lot would remain. The Project Site would be fenced, and a landscape buffer would be installed along the fencing. Thus, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). As such, no Project impacts would occur, and further analysis is not required.

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

(1) Impact Analysis

The Project includes demolition and removal of the two-story, approximately 13,956-square-foot building on the Project Site (the Barry Building) and the installation of a modest landscape buffer along the southern boundary of the Project Site. This analysis addresses whether the Project would result in inadequate emergency access due to traffic generated by construction activities or Project Site constraints. The Project does not propose to develop new land uses on the Project Site; therefore, inadequate emergency access during Project operation would not occur.

(a) Project-Generated Traffic

Demolition activities of the Project would include asbestos abatement, building demolition, and utilities removal, which are anticipated to be completed over approximately 36 working days (see proposed demolition schedule in Table II-1 in Section II, Project Description), with one additional day to plant the landscape buffer. Construction activities for the three demolition phases and the landscape installation phase would not overlap. Haul trucks would travel on approved truck routes designated within the City from San Vicente Boulevard to I-405. The haul route would be reviewed and approved by the City. As stated in Section II, Project Description, approximately 4,174 cubic yards of material would be removed from the Project Site, including 130 cubic yards of asbestos-containing material and 4,044 cubic yards of demolition material. The asbestos-containing material would be removed separately from the demolition material and disposed of at an appropriate facility.

Assuming haul trucks with capacity of 15 cubic yards would be used, the Project would require approximately 1 haul truck per day over a 10-day period to remove the asbestos-containing material and approximately 17 haul truck per day over a 16-day period to remove the demolition material. This would generate approximately 2 daily haul truck trips (1 inbound, 1 outbound) during the asbestos abatement phase and approximately 34 daily haul truck trips (17 inbound, 17 outbound) during building demolition phase. Using a passenger car equivalency (PCE) factor of 2.0, the 2 daily truck trips during asbestos abatement phase would be equivalent to 4 daily PCE trips, and the 34 daily truck trips during building demolition phase would be equivalent to 68 daily PCE trips.

A maximum of 10 demolition workers would be on-site during Project demolition activities, which would result in approximately 9 vehicles on-site daily, after applying an average vehicle occupancy factor of 1.1135 persons per vehicle to account for carpooling. Thus, a maximum of 10 workers would generate 18 daily demolition worker vehicle trips (9 inbound, 9 outbound).

As stated previously, the installation of the landscape buffer along the southern boundary of the Project Site is estimated to take one day to complete. The installation of this landscape buffer would not result in truck or worker trips that exceed the trips generated by the demolition phases.

Based on the above, Project demolition activities would generate a total of 86 total daily trips (68 daily PCE trips from haul truck activity and 18 daily worker vehicle trips). With implementation of PDF-TRA-1 (Demolition Management Plan), all haul truck activity to and from the Project Site would occur outside of the morning and afternoon commuter peak hours. In addition, demolition worker trips to and from the Project Site would also occur outside of the peak hours. As such, the Project would not result in significant peak-hour demolition traffic congestion that could affect emergency access.

(b) Potential Constraints on Access

Construction activities would primarily be contained within the Project Site boundaries. All equipment required for demolition activities and the installation of the landscape buffer would be staged entirely on-site or on the parking lot immediately north of the Project Site (on APN 4404-025-016), or delivered on an as-needed basis. However, temporary closures of the sidewalks adjacent to the Project Site could be required during demolition and/or the installation of the landscape buffer. Temporary traffic controls (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering) would be provided to direct pedestrians safely around any closures and maintain safe pedestrian access along San Vicente Boulevard, as required by the Demolition Management Plan (PDF-TRA-1). The temporary traffic controls would also be provided to maintain a safe pedestrian route to the nearby Brentwood Science Magnet School. Demolition activities and the installation of the landscape buffer would not result in bicycle lane or vehicular travel lanes closures along San Vicente Boulevard and bicycle and vehicular access would be maintained. Thus, Project

demolition activities and the installation of the landscape buffer would not impede emergency access to the Project Site and in the Project vicinity.

(c) Conclusion

Based on the above, Project construction activities would not generate a significant number of daily trips during peak hours or increase congestion in the Project vicinity. Furthermore, pedestrian, bicycle, and vehicle access to the Project Site and Project vicinity would be maintained during construction. The Project does not propose to develop new land uses on the Project Site; therefore, inadequate emergency access during Project operation would not occur. As such, the Project would not result in inadequate emergency access and impacts would be less than significant.

(2) Mitigation Measures

No significant impacts related to emergency access have been identified, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts to emergency access would be less than significant without mitigation.

e) Cumulative Impacts

(1) Impact Analysis

As shown on Table III-1 (in Section III, Environmental Setting), there are 7 related projects within proximity to the Project Site. Five of the related projects are located on Wilshire Boulevard and as such, construction activities associated with those related projects would be limited to the Wilshire Boulevard corridor. Related Project No. 1 is located on Barrington Avenue, north of the Project Site, and Related Project No. 3 is located on Sunset Boulevard, also north of the Project Site. Construction activities for these related projects would largely be limited to near the sites of the projects, away from the Project Site. However, it's possible that potential haul truck trips associated with these related projects and the Project could travel on the same streets to reach the freeway (such as Wilshire Boulevard). As stated previously, PDF-TRA-1 (Demolition Management Plan) would be based on the nature and timing of the Project's specific demolition activities and other construction projects in the vicinity of the Project Site. This would help to distribute cumulative haul trips to minimize any potential temporary congestion. Thus, the Project's contribution to inadequate emergency access would not be cumulatively considerable and cumulative impacts related to emergency access would be less than significant.

(2) Mitigation Measures

No significant cumulative impacts to emergency access have been identified, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to emergency access would be less than significant without mitigation.