

IV. Environmental Impact Analysis

K. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *Transportation Assessment Report for the New Beatrice West Project* (Transportation Assessment) as well as the *Transportation Analysis Addendum* prepared by Linscott, Law & Greenspan, Engineers,¹ and included in their entirety in Appendix K of this Draft EIR. In July 2021, LADOT reviewed and approved the Transportation Assessment. LADOT reviewed and approved the September 2022 Transportation Analysis Addendum in October 2022. LADOT reviewed and approved the April 2023 Transportation Analysis Addendum in August 2023.²

The Transportation Assessment was prepared pursuant to LADOT's Transportation Assessment Guidelines (updated in August 2022), which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay.

The scope of analysis for the Transportation Assessment was developed in consultation with LADOT staff. The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were outlined in a Memorandum of Understanding (MOU), which was approved by LADOT on March 12, 2020. A copy of LADOT's Assessment Letter for the Memorandum of Understanding (MOU) is included as Appendix K.3 of this Draft EIR.

¹ *Linscott Law & Greenspan, Engineers, Transportation Assessment Report New Beatrice West Project, June 1, 2021; Transportation Analysis Addendum for the New Beatrice West Project, September 30, 2022; and the Transportation Analysis Addendum for the New Beatrice West Project dated April 24, 2023 regarding an updated Project buildout.*

² *It is noted that while the April 2023 Transportation Analysis Addendum was provided to LADOT for review, the analysis of the addendum was related to a change in the Project buildout to a later year, which does not affect the CEQA analysis portion of the Transportation Assessment.*

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
- Congestion Management Program
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035
- Palms–Mars Vista--Del Rey 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

(1) Federal

(a) Americans with Disabilities Act (ADA) 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: 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. CVC 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), which defines the methodology for analyzing a project’s transportation impacts in accordance with SB 743, in July 2019 with updates in July 2020 and August 2022.

(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 stop³ or a stop along an existing high-quality transit corridor⁴ 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 current version of 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

³ “Major transit stop” is defined in Public Resources Code (PRC) 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.

⁴ “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.

Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs), and Livable Corridors. These areas account for 4 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 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 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significantly 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 5-percent reduction in VMT per capita, a 9-percent reduction in vehicle hours traveled, and a 2-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, 2016.⁵ 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:

⁵ *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.*

- (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, 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 connect to other streets at both ends.
 - Non-Continuous local streets 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) 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 Element (Framework Element) 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 Palms-Mar Vista-Del Rey Community Plan. The Community Plan includes the following transportation and circulation goals, objectives, and policies that are applicable to the Project:

- **Objective 10-2:** To increase the work trips and non-work trips made on public transit.
- **Goal 11:** Encourage alternative modes of transportation over the use of single occupant vehicles (SOV) 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 developments to provide employee incentives for utilizing alternatives to the automobile, such as, carpools, vanpools, buses, flextime, bicycles and walking.
- **Policy 12-1.4:** Encourage the provision of changing rooms, showers and bicycle storage at new and existing and non-residential developments and public places.

(c) Los Angeles Municipal Code

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

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

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

LAMC Section 12.26 J provides for 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

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT pursuant to CEQA Guidelines Section 15064.3 and the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. 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 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 (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last

⁶ Los Angeles Department of Transportation (LADOT), *Transportation Assessment Guidelines*, 2022.

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 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 urban design principles set forth in the Framework Element 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 Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

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*.

b. Existing Street Systems

The existing circulation system in the transportation analysis Study Area⁸ consists of freeways, arterials, collector roads, and local streets, which provide regional, sub-regional, and local access and circulation in the vicinity of the Project site.

(1) Freeways

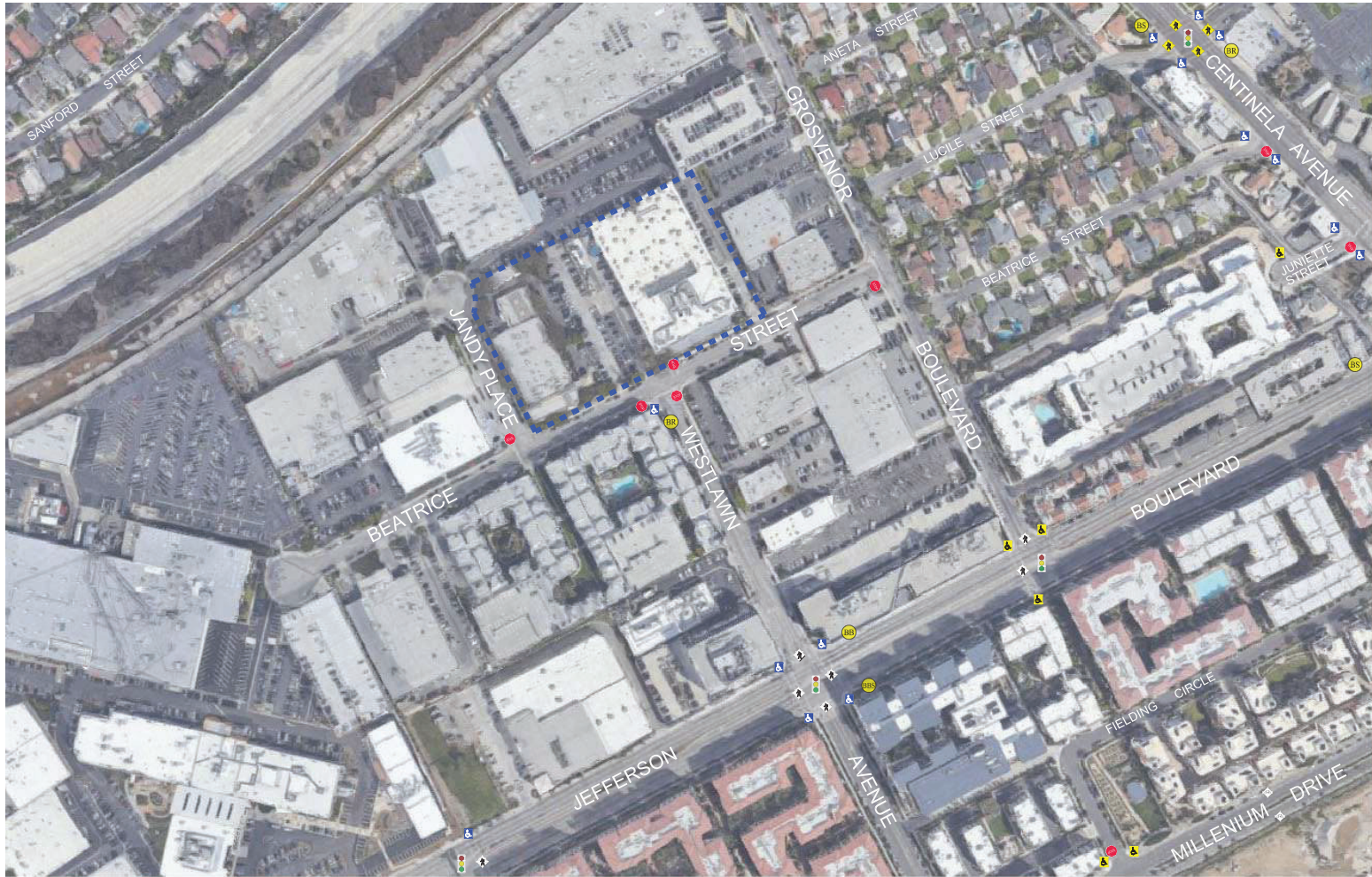
Primary regional access to the Project site is provided by Interstate 405 (I-405) and State Route (SR) 90. I-405 runs in a north-south direction and is located approximately one mile east of the Project site. I-405 provides six mixed-flow freeway lanes in each direction. Access to and from I-405 is available via interchanges along Jefferson Boulevard. SR-90 runs in an east-west direction and is located approximately 0.3 mile north of the Project site. SR-90 provides three to four mixed-flow freeway lanes in each direction. Access to and from SR-90 is available via interchanges along Centinela Avenue.

(2) Streets

The roadways adjacent to the Project site are part of the existing urban roadway network and do not contain hazardous geometric design features, such as sharp curves or dangerous intersections. Listed below are the primary streets that provide local access to the Project site. The existing street system is shown in Figure IV.K-1 on page IV.K-14.

- Beatrice Street—Beatrice Street is a City-designated Local Street and oriented in an east-west direction. It is located adjacent to the southern boundary of the Project site and provides one through travel lane in each direction. Beatrice Street between Westlawn Avenue and Grosvenor Boulevard is identified within the Neighborhood Enhanced Network. There is no speed limit posted on Westlawn Avenue in the Project vicinity; thus, a prima facie speed limit of 25 miles per hour is assumed, consistent with CVC Section 22352(b)(1). Beatrice Street ends in a cul-de-sac one block west of the Project site.
- Jandy Place—Jandy Place is a City-designated Local Street located adjacent to the western boundary of the Project site and is oriented in a north-south direction. It provides one through travel lane in each direction. There is no speed limit posed on Jandy Place in the Project vicinity; thus, a prima facie speed limit of 25 miles per hour is assumed, consistent with CVC Section 22352(b)(1). Jandy Place ends in a cul-de-sac adjacent to the northwestern corner of the Project site.

⁸ The Study Area is defined in the LADOT TAG on pages 2-3 and relates to the geographic area for researching related projects, which is one half mile from a project site.



MAP SOURCE: GOOGLE MAPS

PROJECT SITE

SIGNAL

STOP SIGN

ADA CURB RAMP

ADA YELLOW TRUNCATED DOME

CROSSWALK

YELLOW CROSSWALK

BIKE ROUTE

BIKE RACK

BUS STOP

BUS STOP WITH BUS BENCH

BUS STOP WITH BENCH AND SHELTER

Figure IV.K-1
Existing Street System

- Westlawn Avenue—Westlawn Avenue is a City-designated Local Street located east of the Project site. The street is oriented in a north-south direction. It provides one through travel lane in each direction. Separate exclusive left-turn lanes are provided in each direction on Westlawn Avenue at the Jefferson Boulevard intersection. Westlawn Avenue is identified within the Neighborhood Enhanced Network. There is no speed limit posted on Westlawn Avenue in the Project vicinity; thus, a prima facie speed limit of 25 miles per hour is assumed, consistent with CVC Section 22352(b)(1).
- Grosvenor Boulevard—Grosvenor Boulevard is a County-designated Local Street and is oriented in a north-south direction. It is located east of the Project site. The west side of Grosvenor Boulevard is within the City’s jurisdictional boundary and the east side is within the unincorporated LA County jurisdiction. A shared left-right lane is provided in the southbound direction on Grosvenor Boulevard at the Jefferson Boulevard intersection. Grosvenor Boulevard has a posted speed limit of 25 miles per hour within the Project vicinity.
- Jefferson Boulevard—Jefferson Boulevard is a City-designated Boulevard II and is oriented in an east-west direction. It is located south of the Project site and provides three through travel lanes in each direction. Separate exclusive left-turn lanes are provided in each direction on Jefferson Boulevard at the Westlawn Avenue intersection. A separate exclusive left-turn lane is provided in the eastbound direction on Jefferson Boulevard at the Grosvenor Boulevard intersection. Jefferson Boulevard is designated as part of the Transit Enhanced Network and Pedestrian Enhanced Districts. Jefferson Boulevard has a posted speed limit of 45 miles per hour within the Project vicinity.

(3) Transit System

As shown in Figure IV.K-2 on page IV.K-16, the Project site is served by Metro bus lines 108, 110, 358 along with LADOT Commuter Express 437B, Culver CityBus Line 4, and City of Santa Monica Big Blue Bus 14. Table 3-1 of the Transportation Assessment lists hours of operation and average headways for the transit lines serving the Project site.

c. Existing Project Site Conditions

The Project site is currently developed with a one-story (20-foot tall), 23,072-square-foot office building and two single-story accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and a two-story (26-foot tall), 87,881-square-foot office building at 12541 W. Beatrice Street, as well as surface parking. Vehicular and pedestrian access to the Project site is provided along W. Beatrice Street and along Jandy Place, with one driveway on Jandy Place and four driveways on W. Beatrice Street.



Figure IV.K-2
Existing Transit Network

d. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

Public sidewalks and pedestrian facilities are provided on streets within the Study area. Public sidewalks approximately eight feet in width are provided along the Jandy Place and Beatrice Street property frontages.

(2) Bicycle Facilities

There are no roadways within the City's Bicycle Enhanced Network in close proximity to the Project site and in the surrounding area. However, the location of public bicycle facilities such as bicycle racks within the Study Area are illustrated in Figure 3-3 of the Transportation Assessment.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Conflict with 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

As previously discussed, SB 743 directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts.⁹ SB 743 prohibits the consideration of automobile delay, as described solely by LOS 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

⁹ PRC Section 21099(b)(1).

accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states that “a project’s effect on automobile delay does not constitute a significant environmental impact.” On July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance in a memorandum dated August 9, 2019.

For this analysis the Appendix G Thresholds provided above are relied upon. The methodology and base assumptions used in this analysis were established by LADOT in the MOU dated March 12, 2020.

b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City’s revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. CEQA Guidelines Appendix G Transportation Threshold (a) has been updated to require an analysis of the Project’s potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project’s potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section. In accordance with the LADOT TAG, a project that generally conforms with, and does not obstruct the City’s development policies and standards will generally be considered to be consistent.

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds.¹⁰ The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR’s CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under

¹⁰ OPR, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019 and adopted an update in July 2020.¹¹

The City's VMT impact criteria for development projects is specified in Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, a development project may have a potential significant impact if it generates household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. The Project does not have a residential component.
- For office projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC area in which the project is located. The Project site is located in the West APC and the corresponding threshold is 11.1 daily work VMT per employee. This criterion was used for the office component of the Project.

Local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Based on the TAG, local-serving is defined as retail uses (including restaurants) that are less than 50,000 square feet. This screening criterion was used for the 3,400 square feet of retail/restaurant component of the Project.

¹¹ *The July 2019 version of the TAG is the version that applies to this Project as it was the version in effect at the time LADOT approved the Transportation Assessment Memorandum of Understanding in March 2020. As such, the July 2019 version of the TAG is applied in this analysis.*

Additionally, per the TAG, a project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the RTP/SCS in terms of development location, density, and intensity.

(b) VMT Analysis Methodology

LADOT prepared the VMT Calculator, which is designed to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The VMT Calculator (Version 1.3, released July 2020) accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City, as well as the interaction of land uses within a mixed-use development. It is noted that while the VMT Calculator does not define “mixed-use,” the VMT Calculator allows for internal and external trip capture based on the mix of uses proposed by a development. Some of the key factors built into the VMT Calculator include travel behavior zones, mixed-use development methodology, population and employment assumptions, and transportation demand management (TDM) measures.

(i) Travel Behavior Zone

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation,¹² TBZs were designated in each Census tract throughout the City considering population density, land use density, intersection density, and proximity to transit. They are categorized as follows:

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network.
2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.
3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets.
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

The VMT Calculator determines a project’s TBZ based on the latitude and longitude of a project address. The Project is located in a Suburban Center (Zone 2) TBZ.

¹² LADOT and DCP, *City of Los Angeles VMT Calculator Documentation*, February 2019.

(ii) Mixed-Use Development Methodology

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

- The project location's jobs/housing balance, which factors into how many trips are local or internal to a mixed-use project;
- Land use density where the project is located, which factors into the likelihood of short trips, as well as walking and bicycling;
- Transportation network density, which affects the circuitry of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel;
- Proximity to transit, which affects the likelihood that residents or employees will travel via transit rather than automobile;
- Proximity to retail and other destinations, affecting the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities;
- Vehicle ownership rates, with higher levels of vehicle ownership leading to a higher rate of automobile trips; and
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) but also affects the number of people when calculating the daily VMT per capita.

(iii) Trip Lengths

The VMT Calculator estimates trip lengths to and from a project site based on information from the City's Travel Demand Forecasting Model (City Model). The City Model divides the City into traffic analysis zones (TAZs), to which specific land use and trip-making characteristics can be assigned. The model considers the TAZ where a project is located to determine the trip length and trip type, both of which factor into the calculation of a project's VMT.

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer

Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the United States Department of Energy, and other modeling resources.¹³ A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

(v) Transportation Demand Management Measures

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

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

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

(3) Hazardous Design Features

TAG Threshold T-3 requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions like curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program. Significance may be

¹³ *The 2020 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, but the City's VMT Calculator utilized the editions indicated herein.*

determined qualitatively or quantitatively as best suits the circumstances of the project. If a significant impact is identified, mitigation measures may include installation of new traffic control devices, redesign or relocation of access points, turn restrictions, pavement markings, or vehicular demand management.

As discussed above in the Regulatory Framework, in May 2020, LADOT provided interim guidance on freeway safety analysis for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA. This analysis is included as part of this threshold.

If a freeway ramp analysis is required, the interim guidance provides the following steps to determine if a project may constitute a potential safety impact under CEQA:

- For the identified freeway off-ramps, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. Evaluate the adequacy of the existing and future storage lengths with the 95th percentile queue and 100 percent of the storage length on each lane of the ramp from the stop line to the gore point. When an auxiliary lane is present, add 50 percent of the length of the auxiliary lane to the ramp storage area.
- If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact.
- If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues, which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue. The Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data, including location-based services data from available sources, could be used.

- If the speed differential is 30 mph or more, which may result in a potential safety issue, the guidance suggests a proposed project should consider the following preferred corrective measures to offset a potential safety issue:
 - Transportation demand management program(s) to reduce the project's trip generation,
 - Investments to active transportation infrastructure or transit system amenities (or expansion) to reduce the project's trip generation, and/or
 - Potential operational change(s) to the ramp terminal operations, including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

A physical change to the ramp itself (addition of auxiliary lane, ramp widening, etc.) may be considered. However, this change would have to demonstrate substantial safety benefits, not be a VMT-inducing improvement, and not result in other environmental issues. If the cost of the physical change to the ramp is substantial, then a fair-share contribution to the improvement may be required if necessary requirements are met, including, but not limited to, Caltrans defining the improvement cost, and opening a Project File/Project Account to accept a financial contribution for the improvement.

(4) Emergency Access

The analysis of the Project's potential emergency access impacts includes a review of the proposed vehicle access points and internal circulation. A determination is made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts, including impacts to emergency access.

c. Project Design Features

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

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic

Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, the Worksite Traffic Control Plan, approved by the City of Los Angeles, will 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 construction;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project site; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

Project Design Feature TR-PDF-2: In order to enhance safety for pedestrians on Jandy Place, during the 60-minute lunch time period between 12:30 P.M. and 1:30 P.M., Monday through Friday, the ingress and egress to the Project site from Jandy Place will be closed, and the only available ingress and egress will be via Beatrice Street.

Within the Project's first year of 80-percent occupancy, the Project will submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the A.M. peak and P.M. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined above. The analysis will be submitted to LADOT for review. If deemed warranted by LADOT, the Project will implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-1 in the TAG identifies a list of City adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City. Attachment D to the TAG also provides a list of questions to help guide the review of the documents in Table 2.1-1. Those questions and their responses

are provided in Table 4-1 of the Transportation Assessment included as Appendix K.1 of this Draft EIR.

Each of the documents listed in TAG Table 2.1-1 was reviewed for applicability to the Project, and the relevant transportation-related policies are described below, along with the Project's conformance.

Based on the TAG, the following plans, policies, and programs are relevant to the analysis under Threshold (a) for the Project: Mobility Plan 2035; Community Plan; Vision Zero; the LAMC; and SCAG's 2020–2045 RTP/SCS. The Project's potential to conflict with SCAG's 2020–2045 RTP/SCS is analyzed in Section IV.H, Land Use and Planning, of this Draft EIR. The Project's potential to conflict with the remaining aforementioned programs, plans, ordinances, and policies is analyzed below. It is noted that a project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance, or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with or preclude the City from implementing adopted plans, programs, ordinances, or policies.

(a) Mobility Plan 2035

Mobility Plan 2035 combines “complete street” principles with the following five goals that define the City's mobility priorities:

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

Mobility Plan 2035 further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are provided in Table 4-1 of the Transportation Assessment included as Appendix K.1 of this Draft EIR and discussed in the Section IV.H, Land Use and Planning, of this Draft EIR. As discussed therein, the Project would not conflict with applicable policies of Mobility Plan 2035. Specifically, the Project would not conflict with Policy 2.3 to recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment. The Project would provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street. The Project also would not conflict with

Policy 2.10 to facilitate the provision of adequate on- and off-street loading areas or Policy 3.8 to provide bicyclists with convenient, secure and well-maintained bicycle parking facilities. Additionally, the Project would support Policy 5.4 to continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure by designating parking spaces for low emission vehicles.

Overall, as discussed in the Transportation Assessment and summarized above, the Project is consistent with all applicable policies of Mobility Plan 2035, and the Project does not interfere with other policies identified in Mobility Plan 2035. Therefore, the Project does not conflict with Mobility Plan 2035.

(b) 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) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.

Consistent with the Plan for a Healthy Los Angeles, the Project prioritizes safety and access for all individuals utilizing the Project site by complying with all ADA requirements and providing direct connections to pedestrian amenities. Additionally, the Project supports healthy lifestyles by locating jobs near transit, providing bicycle amenities, and enhancing the pedestrian environment by providing shade trees and landscaping for a more comfortable and inviting environment for pedestrians. The Project does not propose any curbside passenger loading that would conflict with the adjacent vehicular, pedestrian, or bicycle traffic flow within the public right-of-way. Instead, the Project proposes passenger loading to occur in the proposed loading zone on-site. The Project would support multi-mobility options through the provision of secure parking for 63 bicycles.

The Project would also provide employment and entrepreneurial opportunities through the office, retail, and restaurant space at the Project site. The commercial uses would serve Project employees and the surrounding community and would be easily accessed by pedestrians and bicyclists. Finally, the Project is estimated to generate lower VMT per employee than the average for the area, as discussed further below. As VMT directly contributes to GHG emissions, a reduced VMT per employee would result in reduced GHG emissions.

The above discussion highlights characteristics that specifically support policies in the Plan for a Healthy Los Angeles. The Project would not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Therefore, the Project is consistent with and would not obstruct the implementation of the policies recommended by the Plan for a Healthy Los Angeles.

(c) Palms-Mar Vista-Del Rey Community Plan

The Project would not conflict with the following Community Plan goal, objectives, and policies applicable to the Project:

- **Objective 10-2:** To increase the work trips and non-work trips made on public transit.
- **Goal 11:** Encourage alternative modes of transportation over the use of single occupant vehicles (SOV) 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 developments to provide employee incentives for utilizing alternatives to the automobile, such as, carpools, vanpools, buses, flextime, bicycles and walking.
- **Policy 12-1.4:** Encourage the provision of changing rooms, showers and bicycle storage at new and existing and non-residential developments and public places.

Specifically, in support of Objective 10-2, Goal 11, Objective 1101, and Policy 11-1.1, as part of the Project's Transportation Demand Management (TDM) Program, which is required by Mitigation Measure TR-MM-1 (identified below), the Project would implement workplace parking pricing for employees to disincentivize use of SOV and promote alternative modes of transportation, as well as a daily transit subsidy for every employee who travels via transit to work to encourage employees to use public transit. The TDM Program would also include a voluntary travel behavior change program, which would engage a transportation management coordinator for purposes of informing Project employees of available travel options, as well as pedestrian network improvements, which would provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street. Additionally, consistent with Policy 12-1.4, the Project's TDM Program would require bicycle parking in compliance with LAMC requirements and include bicycle parking and bicycle facilities, such as showers and a repair station, to support safe and comfortable bicycle travel. In summary, the Project would not conflict with applicable policies of the Community Plan addressing the circulation system.

(d) Vision Zero Action Plan/Vision Zero Corridor Plans

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025. There are no roadways in the immediate vicinity of the Project site as part of Vision Zero's High Injury Network. Nonetheless, pursuant to Project Design Feature

TR-PDF-2, the Jandy Place driveway be closed during 12:30 P.M. and 1:30 P.M. so as to enhance pedestrian safety during lunchtime hours. Therefore, the Project would not interfere with the implementation of any improvements to the pedestrian environment envisioned by Vision Zero.

(e) LAMC Section 12.21 A.4 (Off-Street Automobile Parking)

LAMC Section 12.21 A.4 details the City's off-street automobile parking requirements for new developments. Per LAMC Section 12.21 A.4(c), the Project would be required to provide 586 parking spaces.¹⁴ The Project would provide a total of 811 parking spaces, exceeding the requirements of the LAMC. Therefore, because the Project's parking supply would comply with LAMC requirements, the Project would not conflict with LAMC Section 12.21 A.4.

(f) LAMC Section 12.21 A.16 (Bicycle Parking)

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. The Project's bicycle parking requirement is 63 spaces. The Project proposes 63 bicycle parking spaces for retail and office users (including 41 long-term and 22 short-term spaces).

(g) LAMC Section 12.26.J (TDM Ordinance)

LAMC Section 12.26 J, the TDM Ordinance (Ordinance No. 168,700, effective March 31, 1993) establishes TDM requirements for non-residential projects. Key requirements of the TDM Ordinance include providing carpool/vanpool loading areas, walkways between buildings and public sidewalks, and improving adjacent bus stops to the satisfaction of local transit agencies. The Project proposes to implement a comprehensive TDM program consistent with the purpose and intent of the TDM Ordinance and consisting of the following basic elements, which are described in more detail in Mitigation Measure TR-MM-1 and the Transportation Assessment (pages 3 through 5):

- Bicycle parking
- Bicycle amenities
- Pedestrian network improvements
- Price workplace parking

¹⁴ Pursuant to LAMC Sections 12.21 A.4(c), (j)(3) and (k) both the office and retail components of the Project require one space for each 500 square feet of floor area; café uses are provided one space per 100 square feet of floor area.

- Voluntary travel behavior change program
- Transit subsidies

The Project would, thus, be consistent with the TDM requirements and would not conflict with the City's current TDM ordinance.

(h) Citywide Design Guidelines

The Citywide Design Guidelines identify 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 Citywide Design Guidelines are organized around three design approaches: pedestrian-first design, 360-degree design, and climate-adapted design. The guidelines that are applicable to this analysis are those under pedestrian-first design. The Project would promote a safe, comfortable, and accessible pedestrian experience, would incorporate vehicular access without degrading the pedestrian experience, and would actively engage with streets and public space and maintain human scale and, thus, is consistent with Citywide Design Guidelines 1 through 3 as analyzed at length in Section IV.H, Land Use and Planning, of this Draft EIR.

(i) Conclusion

As discussed above and detailed in the Transportation Assessment included in Appendix K of this Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

(2) Mitigation Measures

Impacts with respect to conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect to conflict with a program, plan, ordinance, or policy addressing the circulation system were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant without mitigation.

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

(1) Impact Analysis

As discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

As discussed above, the Project site is located in the West Los Angeles Area Planning Commission area and is subject to the following LADOT threshold for determining VMT impacts: Daily Work VMT per Employee of 11.1.

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The Project's proposed land uses and their respective sizes are the primary input in the VMT Calculator. As discussed in Section II, Project Description, of this Draft EIR, the Project includes the construction of a new eight-story office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. Because the proposed ground floor commercial spaces would be less than 50,000 square feet, they are considered local serving (per the TAG). Thus, this portion of the Project is considered to not have a significant VMT impact based on the screening criteria contained in the City's TAG. As shown in Table IV.K-1 on page IV.K-32, based on the Project's proposed office uses and location, the Transportation Analysis Addendum demonstrates that the Project is estimated to result in a total of 2,964 daily vehicle trips, resulting in a daily work VMT per employee of 12.4, which would exceed the daily work VMT per employee of 11.1. **As such, the Project would result in a potentially significant impact with regard to conflict with CEQA Guidelines Section 15064.3(b), and mitigation is required.**

**Table IV.K-1
VMT Analysis Summary**

Land Use Information	Project
General Office	283,981 sf
High-Turnover Sit-Down Restaurant	3,400 sf
VMT Analysis^a	
Employee Population	1,150
Project Area Planning Commission	West Los Angeles
Project Travel Behavior Zone	Suburban Center (Zone 2)
Total Daily VMT	25,972
Work VMT per Employee	12.4
Impact Threshold	11.1
Significant Impact	Yes
<hr/> <i>sf = square feet</i> ^a <i>Project Analysis is from VMT Calculator output reports beginning on page 12 of the Transportation Assessment (Appendix A).</i> <i>Source: Linscott, Law & Greenspan, Engineers, 2022.</i>	

(2) Mitigation Measures

Impacts with respect to conflict with CEQA Guidelines Section 15064.3(b) would be potentially significant. The following mitigation measure has been identified to reduce the potentially significant impact of the Project:

Mitigation Measure TR-MM-1: The Project shall prepare a TDM Plan. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

The following TDM elements shall be included in the Project:

- Price Workplace Parking—implement workplace parking pricing for employees as specified in the Transportation Assessment.
- Voluntary Travel Behavior Change Program—assign a staff person who will serve as the transportation management coordinator for purposes of developing a transportation program and informing Project employees of available travel options.
- Bike parking per LAMC, including short-term and long-term parking facilities, to support safe and comfortable bicycle travel.

- Include secure bike parking, with its own access point, and bike facilities, such as showers and a repair station, to support safe and comfortable bicycle travel by providing end-of-trip amenities.
- Pedestrian Network Improvements—provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street.
- Transit Subsidies—provide a daily transit subsidy as specified in the Transportation Assessment for every employee who requests the transit subsidy, presents evidence of use of transit, and does not request on-site parking.

(3) Level of Significance After Mitigation

Project-level impacts with respect to conflict with CEQA Guidelines Section 15064.3(b) were determined to be potentially significant without mitigation with a daily work VMT per employee of 12.4. As shown in Table IV.K-2 below, with the implementation of Mitigation Measure TR-MM-1, the daily work VMT per employee would be reduced to 10.3, and the impact level would become less than significant with mitigation. Refer to Appendix A of the Transportation Assessment for the full VMT Calculator Output.

Table IV.K-2
VMT Analysis Summary with Mitigation

Land Use Information	Project
General Office	283,981 sf
High-Turnover Sit-Down Restaurant	3,400 sf
VMT Analysis^a	
Employee Population	1,150
Project Area Planning Commission	West Los Angeles
Project Travel Behavior Zone	Suburban Center (Zone 2)
Total Daily VMT	22,146
Work VMT per Employee	10.3
Impact Threshold	11.1
Significant Impact	No
<p><i>sf = square feet</i></p> <p>^a <i>Project Analysis is from VMT Calculator output reports beginning on page 12 of the Transportation Assessment (Appendix A).</i></p> <p><i>Source: Linscott, Law & Greenspan, Engineers, 2022.</i></p>	

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)?

(1) Impact Analysis

As discussed above, the TAG requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design), while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions like curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

On Jandy Place, the Project would include one driveway to access the parking garage with one lane in each direction, in addition to a driveway dedicated to truck deliveries, which is located on the northwestern corner of the Project site. These two driveways would replace the one existing driveway along Jandy Place. On Beatrice Street, the Project would provide one driveway to access the parking garage with two lanes entering and one lane exiting the garage, in addition to the existing driveway on Beatrice Street that currently serves the building at 12541 Beatrice Street. These two driveways would replace the four existing driveways along Beatrice Street. The Project's driveways are designed to minimize conflict points, while ensuring a free flow during peak periods.

LADOT's Manual of Policies and Procedures (MPP) Section 321 recommends that two-way driveways serving commercial and industrial uses be 30 feet in width, while wider driveways may be appropriate for multiple entry lanes. The Project would comply with MPP Section 321 to meet the standard driveway width criteria. The Project's Beatrice Street driveway is proposed to be approximately 42 feet in width, accommodating two travel lanes for inbound vehicular traffic and one lane for outbound vehicular traffic. The Project's Jandy Place driveway for access to the parking structure is proposed to be approximately 30 feet in width, accommodating one lane each for inbound and outbound vehicular traffic. The Project's service access driveway is proposed to be approximately 30 feet in width. Despite both Beatrice Street and Jandy Place being cul-de-sacs, which terminate north and west of the Project site, the LADOT Manual of Policies and the TAG do not indicate any special or unique considerations related to vehicular traffic on streets that are cul-de-sacs. Further, the proposed parking structure driveways on Jandy Place and Beatrice Street would be located approximately 80 feet north and 75 feet east of the Jandy Place/Beatrice Street intersection, respectively, consistent with MPP Section 321. The Project site is located in a flat area with no curves in the adjacent streets, and the driveways provide clear lines of sight. In addition, the Project would not physically modify the curb placement or turning radius at the Jandy Place and Beatrice Street intersection

and would not physically alter the sidewalks along Jandy Place and Beatrice Street adjacent to the Project site.

As described above, the Project also reduces the total number of driveways on the adjacent streets as compared to the existing condition, thereby resulting in fewer potential points of conflict between vehicles and pedestrians/bicyclists. As stated above, the Project site is located in a flat area with no curves in the adjacent streets, and the driveways provide clear lines-of-sight. As provided above, the Project would further enhance safety for pedestrians on Jandy Place as part of Project Design Feature TR-PDF-2 by closing the ingress and egress to the Project site from Jandy Place during the 60 minute lunch time period between 12:30 P.M. and 1:30 P.M. Monday through Friday, and the only available ingress and egress would be via Beatrice Street.

The Project site is not in proximity to streets identified in the HIN or the Safe Routes to School program.

Based on the City's TAG, Project access is considered constrained if a project's traffic would contribute to unacceptable queuing on an Avenue or Boulevard (as designated in the Mobility Plan 2035) at Project driveway(s) or would cause or substantially extend queuing at nearby signalized intersections. Unacceptable or extended queuing may be defined as spill over from turn pockets into through lanes, blocking cross streets or alleys, or contributing to gridlock congestion. For the purposes of this analysis, "gridlock" is defined as the condition where traffic queues between closely-spaced intersections and impedes the flow of traffic through upstream intersections. As provided in Section 5.2, Project Access and Circulation Review of the Transportation Assessment, based on the Project site's location on a cul-de-sac along Jandy Place and in close proximity to the cul-de-sac portion of Beatrice Street, the Transportation Assessment included an analysis of the existing and future traffic volumes using these two cul-de-sacs. Based on LADOT guidance, coordination with LADOT staff, and as presented in the Transportation Assessment MOU, the following seven study intersections were identified for operational evaluation of whether the Project's traffic would contribute to unacceptable queuing on an Avenue or Boulevard:

1. Jandy Place/Project Driveway (unsignalized)
2. Jandy Place/Beatrice Street (unsignalized)
3. Project Driveway/Beatrice Street (unsignalized)
4. Westlawn Avenue/Beatrice Street (unsignalized)
5. Westlawn Avenue/Jefferson Boulevard (signalized)

6. Grosvenor Boulevard/Beatrice Street (unsignalized)
7. Grosvenor Boulevard/Jefferson Boulevard (signalized)

The study locations were based on proximity to the Project site and the importance of the intersections in terms of the Project's site access and circulation scheme. Pursuant to the City's TAG, the Highway Capacity Manual (HCM)¹⁵ methodology for signalized and unsignalized intersections was utilized to calculate vehicle queuing. The operation analysis reports the control delay (in seconds), Levels of Service (LOS), and 95th percentile queues (in feet) for all approaches for the signalized intersections and the most constrained approaches for the unsignalized intersections. A summary of the operational analysis of the study intersections is provided in Table 5-2 of the Transportation Assessment, which concluded that the Project would not cause or substantially extend vehicle queuing at the two signalized study intersections (i.e., Westlawn Avenue/Jefferson Boulevard and Grosvenor Boulevard/Jefferson Boulevard) under the "Existing with Project" scenario. The change in queue length associated with the Project at the two signalized intersections ranges from no change to a maximum of 100.3 feet (i.e., approximately four vehicles) under the "Existing with Project" scenario. As provided in the Transportation Assessment, there is additional queuing forecast at the two signalized intersections under the "Future Cumulative without Project" scenario. This is expected to result from the addition of traffic due to related projects and ambient growth. There is also additional queuing forecast at the southbound left-turn approach of the Westlawn Avenue/Jefferson Boulevard intersection and delays at the southbound shared left-turn/right-turn approach of the Grosvenor Boulevard/Jefferson Boulevard intersection during the P.M. peak hour under the "Future Cumulative with Project" scenario.

As part of the Project Conditions previously approved for the Project, the Project would include implementation of additional left-turn lanes on the southbound approaches of the Westlawn Avenue/Jefferson Boulevard and Grosvenor Boulevard/Jefferson Boulevard intersections (Project Condition Nos. 28.a and 28.b). Implementation of additional left-turn lanes in these locations is calculated to reduce the queue lengths and delays at the respective southbound approaches under the "Future Cumulative with Project" scenario. As indicated in Table 5-2 of the Transportation Assessment, the queue length for the southbound left-turn approach at the Westlawn Avenue/Jefferson Boulevard intersection reduces from 559.5 feet with one southbound left-turn lane to 246.1 feet with two southbound left-turn lanes (i.e., the queue length for the southbound left-turn approach reduces by 313.4 feet or over 12 vehicles) during the weekday P.M. peak hour. The queue length for the southbound shared left-turn/right-turn approach at the Grosvenor

¹⁵ *Highway Capacity Manual 6th Edition, Transportation Research Board of the National Academies of Sciences-Engineering-Medicine, 2016. The Highway Capacity Manual provides methods for quantifying highway capacity.*

Boulevard/Jefferson Boulevard intersection reduces from 569.0 feet to 207.8 feet (i.e., the queue length reduces by 361.2 feet or just over 14 vehicles) during the weekday P.M. peak hour and the LOS improves from LOS E to LOS C.¹⁶

With regard to the remaining five unsignalized study intersections, the Transportation Assessment concluded that the Project's weekday A.M. and P.M. peak hour traffic volumes would have a nominal effect on vehicle queuing at these five unsignalized study intersections (i.e., Jandy Place/Project Driveway, Jandy Place/Beatrice Street, Project Driveway/Beatrice Street, Westlawn Avenue/Beatrice Street, and Grosvenor Boulevard/Beatrice Street) under the "Existing with Project" scenario. The change in queue length associated with the Project at the unsignalized intersections ranges from no change to a maximum queue length of 107.5 feet (i.e., just over four vehicles) under the "Existing + Project" scenario. There is additional queuing forecast at the Westlawn Avenue/Beatrice Street unsignalized intersection on the eastbound Beatrice Street approach under the "Future Cumulative without Project" scenario. However, while the change in queue length associated with the Project under the "Future Cumulative with Project" scenario for the unsignalized intersections ranges from no change to a maximum of 215 feet (i.e., just over eight vehicles), Beatrice Street is designated as a Local Street by the City, not an Avenue or a Boulevard, and, thus, the City's TAG threshold is not exceeded.

Overall, the Transportation Assessment concluded that with incorporation of the previously approved improvements, which will be incorporated into the Project, the Project weekday A.M. and P.M. peak hour traffic volumes would not cause or substantially extend vehicle queuing at the study intersections analyzed and, therefore, would not cause any constraint on the Project access.

Based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and a less-than-significant impact would occur.

(2) Mitigation Measures

Impacts with respect to hazardous geometric design features would be less than significant. Therefore, no mitigation measures are required.

¹⁶ As discussed under Subsection 2.(2)(d), SB 743, which went into effect in January 2014, included the elimination of 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. Nevertheless, a discussion of vehicle capacity is included to show that Project would not cause or substantially extend vehicle queuing at any of the study intersections analyzed and, therefore, would not cause any constraint on the Project access.

(3) Level of Significance After Mitigation

Impacts with respect to hazardous geometric design features were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant without mitigation.

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

(1) Impact Analysis

(a) Construction

Emergency services in the vicinity of the Project site are provided by the Los Angeles Fire Department (LAFD) and the Los Angeles Police Department (LAPD). The nearest emergency/disaster routes to the Project site are Lincoln Boulevard (1.0 mile) to the west, SR 90 (0.1 mile) and Venice Boulevard (1.5 miles) to the north, Sepulveda Boulevard (1.2 miles) to the east, and Manchester Avenue (1.6 miles) to the south.¹⁷

Construction activities associated with the Project could potentially impact the provision of emergency services provided by the LAFD and the LAPD in the vicinity of the Project site as a result of movement of construction equipment, hauling of soil and delivery of materials, and utility line connections. These short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Traffic Management Plan prepared pursuant Project Design Feature TR-PDF-1, emergency access would not be impeded. Specifically, the Project's Construction Traffic Management Plan would require review and approval from LADOT prior to the start of construction to ensure that adequate and safe access would remain available within and near the Project site during construction activities. In addition, the Project would ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project site and traffic flow is maintained on adjacent rights-of-way, as well as on the City-designated disaster routes. Therefore, impacts to emergency access, including emergency routes, during construction of the Project would be less than significant.

¹⁷ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, November 1996, Exhibit H.*

(b) Operation

With regard to operation, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access, which would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction Projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project site to the LAPD that includes access routes and any additional information that might facilitate police response. Additionally, while not required to reduce any potentially significant impacts, pursuant to Project Design Feature TR-PDF-2, the Jandy Place driveway will be closed between 12:30 P.M. and 1:30 P.M. so as to enhance pedestrian safety during lunchtime hours. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As detailed in the Transportation Assessment and summarized above under Threshold (c), the Transportation Assessment did not identify any congestion resulting from Project traffic or driveway design that would impede access to the Project site. As such, emergency access to the Project site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation of the Project.

Based on the above, impacts regarding adequate emergency access would be less than significant.

(2) Mitigation Measures

Impacts with respect to inadequate emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect to inadequate emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant without mitigation.

e. Cumulative Impacts

(1) Impact Analysis

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

As provided in the Transportation Assessment, a total of five potential related projects have been identified in the vicinity of the Project site for inclusion in the cumulative impact analysis regarding transportation. Due to the impact on traffic of the COVID-19 pandemic at the time the Transportation Assessment was undertaken, LADOT directed that historical traffic count data from 2016 be used for the traffic analysis and appropriately modified to represent current (pre-pandemic) traffic conditions. Four of the five related projects listed in the Transportation Assessment were pending in 2016 but have since been completed or terminated but are included in the traffic analysis in order to account for their associated traffic. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements. The related projects primarily propose high-density residential, office, and commercial uses in an area with good transit connectivity, reducing dependence on automobiles and encouraging more active travel modes, and would be required to implement a TDM program. Thus, related projects are anticipated to be in compliance with the Mobility Plan. In addition, similar to the Project, none of the related projects are adjacent to any streets identified in the City's High Injury Network, and it is anticipated that none of the related projects would preclude future Vision Zero Safety Improvements by the City. As with the Project, each related project would also include the required number of vehicle and bicycle parking spaces in accordance with LAMC requirements and would not conflict with the City's TDM Ordinance. Accordingly, no significant cumulative impacts are anticipated to which both the Project and other nearby related projects would contribute in regard to City transportation policies or standards adopted to protect the environment and support multimodal transportation options.

Based on the above, Project impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Vehicle Miles Traveled

The TAG advise that a development project would have a cumulative VMT impact if it were deemed inconsistent with SCAG's 2020–2045 RTP/SCS, the regional plan to reach State air quality and GHG emissions reduction targets. Also based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the 2020–2045 RTP/SCS and, therefore, would also have no cumulative VMT impact. As evaluated above, the Project would result in a

less-than-significant VMT impact. Additionally, the Project is in an infill location with convenient access to public transit and opportunities for walking and biking, which would result in a reduction of vehicle trips, VMT, and GHG emissions. Further discussion regarding the Project's potential to conflict with SCAG's 2020–2045 RTP/SCS is included in Section IV.H, Land Use and Planning, of this Draft EIR. The Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing an integrated creative office campus with ground floor restaurant and retail uses on a Project site within a designated HQTAs that is well-served by public transit. **Therefore, Project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(c) Hazardous Geometric Design Features

According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. Related Project No. 3 at 5405 S. Jandy Place¹⁸ and the Project would likely both have driveways on Jandy Street on the same block, and the potential traffic from Related Project No. 3 was taken into consideration for purposes of assessing potential access and hazard issues in the Transportation Assessment. Additionally, the design and implementation of new driveways associated with the Project would comply with the City's applicable requirements, including emergency access requirements set forth by LAFD. The design of related projects would also be reviewed by the Los Angeles Department of Building and Safety, the City of Los Angeles Bureau of Engineering, and the LAFD, as applicable, during the City's plan review process to ensure all applicable requirements are met. **Therefore, Project impacts with respect to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access, which would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118,

¹⁸ Note that Related Project No. 3 has been terminated. However, it was included in the Traffic Assessment for conservative analysis.

and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the Study Area and would not be concentrated to a specific location. Also, as previously discussed, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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