

Appendix I  
**CEQA Analysis of Transportation  
Impact**



# LA River Phase IV Bike Path

## CEQA Analysis of Transportation Impacts

CEQA Appendix G Checklist XVII. Transportation, a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

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FEHR  PEERS

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# Overview

This document includes an investigation of potential conflicts of the LA River Phase IV Bike Path (Project) with adopted City plans and Policies, pursuant to the City of Los Angeles Department Transportation Assessment Guidelines (LADOT TAG) (City of Los Angeles, 2022) (Threshold T-1). The Project is not expected to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and would result in a **less than significant impact** to this criterion under CEQA. This finding is detailed in the sections below, organized as follows:

## 1. Review for Consistency with Relevant City Plans, Policies, Programs, and Ordinances

- This section describes the Project’s potential conflicts with the following Plans or Policies, as identified in LADOT TAG Table 2.1-1:
  - 1 – Los Angeles Mobility Plan 2035
  - 2 – Plan for Healthy LA
  - 3 – Hollywood Community Plan
    - The Project is not located within a Specific Plan Overlay
  - 9 – Citywide Design Guidelines
- The Project’s potential for conflicts with the Table 2.1-1 Plan or Policies listed below are not discussed in this document because they are not conceptually or geographically relevant to the Project, thus the Project would not conflict with them.
  - 4 – LAMC Section 12.21 A.16 (Bicycle Parking)
    - The Project is not a “new development” nor an “addition that would increase the floor area of a building”.
  - 5 – LAMC Section 12.26J (TDM Ordinance)
    - The Project does not involve the construction of new floor area.
  - 6 – Vision Zero Action Plan
    - The Project is not located on a Vision Zero High-Injury Network
  - 7 – Vision Zero Corridor Plans
    - The Project is not located on a Vision Zero Project Corridor
  - 8 – Streetscape Plans
    - The Project is not located within a Streetscape Plan Overlay

## 2. Attachment D: Plan Consistency Worksheet from LADOT TAG

# 1. Review for Consistency with Relevant City Plans, Policies, Programs, and Ordinances

## Review of Consistency with Mobility Plan 2035

The Project's consistency with the Mobility Plan 2035 has been addressed in *LADOT Attachment D: Plan, Policy, and Program Consistency Worksheet*, which is included in **Section 2** of this document. There were no aspects of the Project that conflicted with the Mobility Plan 2035.

## Review of Consistency with Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles was adopted in 2015 as part of the Los Angeles General Plan and updated in 2021 with technical amendments to the Health Element to highlight compliance with SB1000.

### *Chapter 2, A City Built for Health*

- **Policy 2.4 Aging in place:** Mobilize and support a life-long process of active aging by making Los Angeles an "age-friendly" city that strives to create a positive, socially inclusive, and supportive environment, that encourages barrier-free buildings and streets, enhanced mobility and independence of people with disabilities, safe neighborhoods, and opportunities for volunteer and paid work.
  - The Project would not conflict with this policy, as the existing infrastructure along the LA River Bike Path would be extended.

## Review of Consistency with Hollywood Community Plan

The current Hollywood Community Plan (HCP) was adopted in 1988. The Project is located within an area designated for open space within the Griffith Park area of the community plan. The Project site is not located within one of the Specific Plan Overlays for the Hollywood Community Plan. The current HCP includes transportation related policies and objectives within the Public Improvements section of the plan.

### *Public Improvements*

- **2. Recreation, Parks, and Open Space.** The city should encourage continuing efforts by County, State, and Federal agencies to acquire vacant lands for publicly owned open space. The Plan encourages the creation of the Los Angeles River Greenbelt corridor which would be integrated with existing and proposed parks, bicycle paths, equestrian trails, and scenic routes.

- The Project would not conflict with efforts to create the Los Angeles River Greenbelt. The Project will extend the existing LA River bike path and improve the feasibility of future extensions.

The Hollywood Community Plan Update is currently underway and was most recently adopted by the Los Angeles City Council in May 2023. The implementing ordinances of the plan update are currently under review which must be completed before the City Council can bring the plan into effect. This Project has been reviewed for conflicts with the current draft update to the plan. The HCP Update includes transportation-related policies, objectives, and programs in Chapter 4: Public Realm, Parks, and Open Space and Chapter 6: Mobility and Connectivity.

#### *Chapter 4: Public Realm, Parks, and Open Space*

- **PR3.10 Access to Open Space.** Maintain and improve access to existing open and new open space including walking, hiking, and equestrian trails. Maintain and improve bicycle access to open space. Support the connection of existing walking, hiking, and equestrian trail segments in the Plan Area, including the Rim of the Valley trails corridor, where feasible. (P61, P62)
  - The Project would not conflict with this policy, as the Project improves bicycle access to open space by extending the existing LA River Bike Path and improving mobility for bicyclists and equestrians.
- **PR3.13 Los Angeles River.** Support recommendations of the Los Angeles River Revitalization Master Plan for establishing parks, walking paths, bicycle trails, gathering spaces, and public art along the Los Angeles River
  - The Project would not conflict with this policy, as the Project extends the existing LA River Bike Path. The Los Angeles River Master Plan is also discussed in detail later in this section.
- **PR3.14 Los Angeles River Improvement Overlay Zone.** Observe guidelines for mobility, watershed management and urban design as established by the Los Angeles RIO Zone.
  - The Project would not conflict with the guidelines in the Los Angeles River Overlay Zone. The Project improves mobility options for bicyclists and equestrians by extending the LA River Bike Path.

#### *Chapter 6: Mobility and Connectivity*

- **M1.1 Mobility for all modes.** Maintain the street system to facilitate the mobility of all modes. Support the maintenance and rehabilitation of all Streets and Highways.
  - The Project would not conflict with this policy. The Project would improve multi-modal mobility along the Los Angeles River by extending the existing Los Angeles River Bike Path.

- **M5.1 Safety and Convenience.** Support and encourage bicycling as a mobility option by supporting infrastructure, facilities, and programs that create a safe and convenient environment to ride bicycles.
  - The Project would not conflict with this policy, as the Project improves the existing conditions for bike riding along this portion of the Los Angeles River and creates a more convenient environment for bicyclists.
- **M5.4 Bikeway connections.** Connect existing and propose bicycle facilities such as bike paths, protected bike lanes, bike lanes and bike routes, in the Hollywood Community Plan Area to bicycle facilities in other communities, where possible.
  - The Project would not conflict with efforts to connect bicycle facilities in other communities in Los Angeles. The completion of the Project will extend the existing LA River Bike Path and support the feasibility of future Bike Path extensions.
- **M5.5 Bikeway connections to LA River.** Connect bicycle facilities such as bike paths, protected bike lanes and bike routes by the Los Angeles River to bicycle facilities in central Hollywood.
  - The Project would not conflict with this policy as it extends the existing LA River Bike Path. The Project would support the feasibility of future extensions and connections to the LA River Bike Path.
- **M.5.10 Routes.** Maintain existing planned bicycle routes and consider future connections and routes.
  - The Project would not conflict with this policy, as the Project is an extension of an existing portion of LA River Bike Path. Additionally, the completion of this Project will support future extensions of the LA River Bike Path.
- **M7.3 Trail connections.** Encourage, where appropriate, a network of trails to facilitate recreational uses such as mountain biking, horseback riding and hiking.
  - The Project would not conflict with efforts to encourage trail connections. The Project will extend the existing Los Angeles River Bike Path and support future connections to existing trails for bicyclists and horseback riders.

## Review of Consistency with Los Angeles Citywide Design Guidelines

The Citywide Design Guidelines were adopted by the City Planning Commission of Los Angeles in 2019. The Plan aims to create a cohesive design language across Los Angeles and promote pedestrian focused design. A review of the Citywide Design Guidelines was conducted to evaluate if the Project would conflict with the implementation of this Plan.

Section 1 of the Citywide Design Guidelines includes transportation related goals, policies, and objectives relevant to the Project.



### *Section 1: Pedestrian-First Design*

- **Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.** Design projects to be safe and accessible and contribute to a better public right-of-way for people of all ages, genders, and abilities, especially the most vulnerable — children, seniors, and people with disabilities.
  - The Project would not conflict with this policy, as the Project would extend the existing Los Angeles River Bike Path. The extension of the Bike Path will increase residents' pedestrian accessibility to and mobility along the LA River.

### **Review of Consistency with Los Angeles River Master Plan**

The LA River Master Plan was updated in June 2022. The Plan updated the original LA River Master Plan that was adopted in 1996. The purpose of the plan is to guide the development and revitalization of the Los Angeles River Corridor. This Plan includes goals and actions to improve transportation and mobility along the Los Angeles River. A review of the updated LA River Master Plan was conducted to evaluate if the Project would conflict with the implementation of this Plan.

Section 3 of the LA River Master Plan includes a chapter on the goals, actions, and methods which includes transportation related goals, policies, and objectives relevant to the Project.

### *Section 3: The Future of the LA River*

Chapter 6: Goals, Actions, and Methods. Nine Goals are supported by actions and methods to set the strategic directions for the LA River.

- **Goal Two: Provide Equitable, Inclusive, and Safe Parks, Open Space, and Trails.** Members of the community identified walking and bicycling as the top two activities they participate in along the river – with participation in these two activities together greater than the participation in all other activities combined. Yet, 61% said they do not use the river due to safety concerns. By aiming to provide 51 miles of safe, connected open space, the LA River can be a valued recreational resource for the surrounding communities in LA County.
  - The Project is aligned with this goal and would extend the existing Los Angeles River Bike Path. This Project would increase the mileage of connected open space along the river and would not preclude the implementation of personal safety or security upgrades.
- **Action 2.1: Create 51 miles of connected open space along the river.** The LA River has great potential to serve as the backbone of an open space network across LA County. This 51-mile backbone would be unique within the county, providing park space to underserved adjacent communities, offering a variety of experiences from one mile to the next, and serving as a destination for the entire county and beyond.
  - The Project supports this action and would extend the existing Los Angeles River Bike Path. This Project would increase the mileage of connected open space along the river.

Additionally, this Project will support future extensions and connections to other segments of the LA River Bike Path.

- **Action 2.2: Complete the LA River Trail so that there is a continuous route along the entire river, and encourage future routes on both sides where feasible.** As a recreation and transportation route, the LA River Trail serves multiple purposes. However, it has yet to live up to its full potential because it is fragmented. A continuous route along the entire river would serve as a major bicycle and pedestrian artery through LA County, offering short- and long-distance routes for cyclists and pedestrians that are protected from vehicular traffic. Not only would the trail itself provide a new experience, but the connections it would make between parks, trails, job centers, and other destinations would make an abundance of nearby experiences more accessible to those who could access the river.
  - The Project is aligned with this action as it would extend the existing Los Angeles River Bike Path. This Project would support future connections and extensions of the Bike Path envisioned in this action.
- **Action 2.3: Provide support facilities at a regular cadence along the length of the river, on both sides where feasible.** Basic amenities, such as signage, benches, and water fountains, make casual and experienced users more comfortable. In addition, the climate in LA County makes for many hot days throughout the year that can negatively affect usage. Shade and water can mitigate these effects.
  - The Project would not conflict with this action, as the project would extend the existing Los Angeles River Bike Path. The Project is a segment along the larger LA River Bike Path, and would not preclude the implementation of support facilities along the path as a whole.
- **Action 2.4: Ensure design excellence within and along the river corridor.** Excellence in design enhances function. From the earliest stages of project development, it is important to consider how a project can be beautiful while addressing multiple needs of adjacent communities. Design excellence requires an attention to quality of built structures, the landscape, the way buildings and landscapes interact with each other, and how projects interface with the river and surrounding communities. Integrating artists and designers early in the process can help lead to design excellence. Elevating the quality of design along the LA River will also serve to elevate the level of design across LA County.
  - The Project would not conflict with this action. The Project would extend the existing Los Angeles River Bike Path and will include landscape and arborist planning.
- **Action 2.5: Encourage compatibility of the river and adjacent land uses.** The appeal of the LA River corridor can be undercut by adjacent uses that are off-putting due to safety, smell, pollution, or noise. Large blocks of incompatible adjacent uses could act as or be perceived to be a barrier to access to the river. Conversely, complementary land uses can be mutually beneficial. For example, adjacent open spaces, restaurants, or retail that connect with the river could

encourage patrons to use the river trail, and users of the river trail could increase patronage of those adjacent uses.

- The Project would not conflict with this action. The Project is an extension of the Los Angeles River Bike Path location between California State Route 134 and the Los Angeles River. The Project does not directly affect what land uses could be encouraged on the opposite side of the freeway or river, respectively, and would not preclude the encouragement of land compatible uses.
- **Action 2.6: Repurpose single-use spaces, such as power-line easements, rail rights-of-way, or flood infrastructure, to serve multiple functions such as multi-use trails or habitat, and prioritize spaces that are in high and very high park need areas.** With little vacant land and relatively high property values and construction costs, LA County cannot afford to have spaces that serve only a single purpose. Multiple uses of space are necessary to ensure benefits outweigh costs.
  - The Project supports this action. The Project would extend the existing Los Angeles River Bike Path using the right-of-way underneath existing power line infrastructure.
- **Action 2.7: Promote life safety along the river.** A reimagined river is intended to draw more people to use the river corridor. With increased usage comes a responsibility to provide for the safety of those users through increased awareness, hazard mitigation, and emergency response.
  - The Project would not conflict with this action. The Project proposes a chain link fence between the bike path extension and the river and would not preclude the implementation of further awareness hazard mitigation, and emergency response.
- **Action 2.8: Promote public safety along the river.** Community members named safety as the top reason they do not use the LA River. Improving the perception of safety means addressing physical and perceptual factors. Physical factors include having appropriately scaled railings and a path that is clear of debris. Perceptual factors include adequate lighting and “eyes on the river” by other users, security officials, or adjacent uses.
  - The Project would not conflict with this policy. The Project includes a chain link fence along the path to provide separation from the river and freeway, as well as lighting.
- **Goal Four: Enhance opportunities for equitable access to the river corridor.** Today, ease and availability of access to trails along the LA River is highly variable. About 90 access points connect people to trails that serve 32 of the river’s 51 miles. Yet, only one-third of these access points have signs and only 70% connect to sidewalks. Many access points are well served by bus, but only two Metro rail stops fall within a half mile of an access point to the river. It is therefore not surprising that one of the top five reasons community residents cited for not visiting the LA River is simply not knowing where to go. The LA River is intended to be a resource for use by all of LA County, and to be a resource the river must be accessible and usable.

- The Project supports this goal and would extend the existing Los Angeles River Bike Path. This Project would increase the mileage of connected open space along the river and provide more space for bicyclists and equestrians.
- **Action 4.1: Create welcoming access points and gateways to the LA River and LA River Trail to optimize physical access along its length, on both sides.** Along parts of the river that currently have trails, only about a third of access points have signs, less than two thirds appear to be clearly accessible by persons with disabilities, less than half connect to bridges that allow access to both sides of the river, and one in ten are just user-created holes in fences. Together, these conditions obscure, limit, and impede access to the LA River Trail. All access points should be welcoming so that potential users are drawn to and feel welcome to use the river.
  - The Project would not conflict with this action, as the Project would extend and improve the existing Los Angeles River Bike Path. The extension created by the Project shall be clearly marked with signage indicating the path's purpose and regulations.
- **Action 4.2: Increase safe transportation routes to the river.** Ensuring that there are clear, safe, direct connections from neighborhoods to the LA River makes nearby neighbors more likely to use the river and, by extension, the broader LA County network of parks and trails that the river connects to. The ease and quality of these connections is important because impressions of traveling to and from the river can influence the entire river experience. This is especially important where physical barriers currently hinder access to the river. Current research by scholars such as Dr. Richard Jackson of the University of California at Los Angeles and Dr. William Sullivan of the University of Illinois at Urbana-Champaign indicates a favorable relationship between parks and health. Increasing overall acres of parkland and access to parks can positively benefit communities by reducing rates of preventable diseases such as diabetes and obesity.
  - The Project would not conflict with this action, as the Project would extend the existing Los Angeles River Bike Path. The extension created by the Project will increase the distance that residents and neighbors can travel along the Bike Path.

## 2. Attachment D: Plan Consistency Worksheet



## Attachment D: Plan, Policy, and Program Consistency Worksheet

### Plans, Policies and Programs Consistency Worksheet

The worksheet provides a structured approach to evaluate the threshold T-1 question below, that asks whether a project conflicts with a program, plan, ordinance or policy addressing the circulation system. The intention of the worksheet is to streamline the project review by highlighting the most relevant plans, policies and programs when assessing potential impacts to the City's circulation system.

**Threshold T-1:** Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

This worksheet does not include an exhaustive list of City policies, and does not include community plans, specific plans, or any area-specific regulatory overlays. The Department of City Planning project planner will need to be consulted to determine if the project would obstruct the City from carrying out a policy or program in a community plan, specific plan, streetscape plan, or regulatory overlay that was adopted to support multimodal transportation options or public safety. LADOT staff should be consulted if a project would lead to a conflict with a mobility investment in the Public Right of Way (PROW) that is currently undergoing planning, design, or delivery. This worksheet must be completed for all projects that meet the Section I. Screening Criteria. For description of the relevant planning documents, **see Attachment D.1.**

For any response to the following questions that checks the box in **bold text** (i.e.  **Yes** or  **No**), further analysis is needed to demonstrate that the project does not conflict with a plan, policy, or program.

#### I. SCREENING CRITERIA FOR POLICY ANALYSIS

If the answer is 'yes' to any of the following questions, further analysis will be required:

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

Yes  No

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

Yes  **No**

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

**Yes**  No

#### II. PLAN CONSISTENCY ANALYSIS

##### A. Mobility Plan 2035 PROW Classification Standards for Dedications and Improvements

These questions address potential conflict with:



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**Mobility Plan 2035 Policy 2.1 – Adaptive Reuse of Streets.** Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.

**Mobility Plan 2035 Policy 2.3 – Pedestrian Infrastructure.** Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

**Mobility Plan 2035 Policy 3.2 – People with Disabilities.** Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

**Mobility Plan 2035 Street Designations and Standard Roadway Dimensions**

A.1 Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone?  Yes  No

A.2 If **A.1 is yes**, is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designation.  Yes  No  N/A

A.3 If **A.2 is yes**, is the project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II, or III)?  Yes  No  N/A

If the answer is to **A.1 or A.2 is NO, or to A.1, A.2 and A.3. is YES**, then the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.

A.4 If the answer to **A.3. is NO**, is the project applicant asking to waive from the dedication standards?  Yes  No  N/A

Lists any streets subject to dedications or voluntary dedications and include existing roadway and sidewalk widths, required roadway and sidewalk widths, and proposed roadway and sidewalk width or waivers.

Frontage 1 Existing PROW'/Curb' : Existing	<u>N/A</u>	Required	<u>N/A</u>	Proposed	<u>N/A</u>
Frontage 2 Existing PROW'/Curb' : Existing	<u>N/A</u>	Required	<u>N/A</u>	Proposed	<u>N/A</u>
Frontage 3 Existing PROW'/Curb' : Existing	<u>N/A</u>	Required	<u>N/A</u>	Proposed	<u>N/A</u>
Frontage 4 Existing PROW'/Curb' : Existing	<u>N/A</u>	Required	<u>N/A</u>	Proposed	<u>N/A</u>

If the answer to **A.4 is NO**, the project is inconsistent with Mobility Plan 2035 street designations and must file for a waiver of street dedication and improvement.

If the answer to **A.4 is YES**, additional analysis is necessary to determine if the dedication and/or improvements are necessary to meet the City's mobility needs for the next 20 years. The following factors may contribute to determine if the dedication or improvement is necessary:

Is the project site along any of the following networks identified in the City's Mobility Plan?



- Transit Enhanced Network
- **Bicycle Enhanced Network**      **The Project itself is part of the Bicycle Enhanced Network: "Valley LA River Path"**
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network

To see the location of the above networks, see **Transportation Assessment Support Map**.<sup>1</sup>

Is the project within the service area of Metro Bike Share, or is there demonstrated demand for micro-mobility services? **The nearest Metro Bike Share station is approximately 2.4 miles (by bike) from the western extent of the Project. Because the Project is a Bike Path, there may be a demand for micro-mobility services.**

If the project dedications and improvements asking to be waived are necessary to meet the City's mobility needs, the project may be found to conflict with a plan that is adopted to protect the environment.

## **B. Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes**

### **B.1 Project-Initiated Changes to the PROW Dimensions**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 2.1 – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.***

***Mobility Plan 2035 Policy 2.3 – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.***

***Mobility Plan 2035 Policy 3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.***

***Mobility Plan 2035 Policy 2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.***

### **Mobility Plan 2035 Street Designations and Standard Roadway Dimensions**

B.1 Does the project propose, above and beyond any PROW changes needed to comply with Section 12.37 of the LAMC as discussed in Section II.A, physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?

Examples of developer-initiated physical changes to the public right-of-way include:

- widening the roadway,
- narrowing the sidewalk,
- adding space for vehicle turn outs or loading areas,
- removing bicycle lanes, bike share stations, or bicycle parking

<sup>1</sup> LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>





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- modifying existing bus stop, transit shelter, or other street furniture
- paving, narrowing, shifting or removing an existing parkway or tree well

Yes  No

### **B.2 Driveway Access**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 2.10 – Loading Areas.*** Facilitate the provision of adequate on and off-site street loading areas.

***Mobility Plan 2035 Program PL.1. Driveway Access.*** Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.

***Citywide Design Guidelines - Guideline 2:*** Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

#### **Site Planning Best Practices:**

- *Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.*
- *Minimize both the number of driveway entrances and overall driveway widths.*
- *Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.*
- *Orient vehicular access as far from street intersections as possible.*
- *Place drive-thru elements away from intersections and avoid placing them so that they create a barrier between the sidewalk and building entrance(s).*
- *Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.*

B.2 Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT's Driveway Design Guidelines (See Sec. 321 in the Manual of Policies and Procedures) by any of the following:

- locating new driveways for residential properties on an Avenue or Boulevard, and access is otherwise possible using an alley or a collector/local street, or
- locating new driveways for industrial or commercial properties on an Avenue or Boulevard and access is possible along a collector/local street, or
- the total number of new driveways exceeds 1 driveway per every 200 feet<sup>2</sup> along on the Avenue or Boulevard frontage, or
- locating new driveways on an Avenue or Boulevard within 150 feet from the intersecting street, or
- locating new driveways on a collector or local street within 75 feet from the intersecting street, or

<sup>2</sup> for a project frontage that exceeds 400 feet along an Avenue or Boulevard, the incremental additional driveway above 2 is more than 1 driveway for every 400 additional feet.



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- locating new driveways near mid-block crosswalks, requiring relocation of the mid-block crosswalk

Yes  No

If the answer to **B.1 and B.2 are both NO**, then the project would not conflict with a plan or policies that govern the PROW as a result of the project-initiated changes to the PROW.

### Impact Analysis

If the answer to either **B.1 or B.2 are YES**, City plans and policies should be reviewed in light of the proposed physical changes to determine if the City would be obstructed from carrying out the plans and policies. The analysis should pay special consideration to substantial changes to the Public Right of Way that may either degrade existing facilities for people walking and bicycling (e.g., removing a bicycle lane), or preclude the City from completing complete street infrastructure as identified in the Mobility Plan 2035, especially if the physical changes are along streets that are on the High Injury Network (HIN). The analysis should also consider if the project is in a Transit Oriented Community (TOC) area, and would degrade or inhibit trips made by biking, walking and/ or transit ridership. The streets that need special consideration are those that are included on the following networks identified in the Mobility Plan 2035, or the HIN:

- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network
- High Injury Network

To see the location of the above networks, see **Transportation Assessment Support Map**.<sup>3</sup>

Once the project is reviewed relevant to plans and policies, and existing facilities that may be impacted by the project, the analysis will need to answer the following two questions in concluding if there is an impact due to plan inconsistency.

B.2.1 Would the physical changes in the public right of way or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?

Yes  No  N/A

B.2.2 Would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the City from advancing the safety of vulnerable roadway users?

Yes  No  N/A

If either of the answers to either **B.2.1 or B.2.2 are YES**, the project may conflict with the Mobility Plan 2035, and therefore conflict with a plan that is adopted to protect the

<sup>3</sup> LADOT Transportation Assessment Support Map <https://arcg.is/fubbD>



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environment. If either of the answers to both **B.2.1. or B.2.2. are NO**, then the project would not be shown to conflict with plans or policies that govern the Public Right-of-Way.

**C. Network Access**

**C. 1 Alley, Street and Stairway Access**

These questions address potential conflict with:

***Mobility Plan Policy 3.9 Increased Network Access: Discourage the vacation of public rights-of-way.***

C.1.1 Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?

Yes  **No**

C.1.2 If the answer to C.1.1 is Yes, will the project provide or maintain public access to people walking and biking on the street, alley or stairway?

Yes  **No**  **N/A**

**C.2 New Cul-de-sacs**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 3.10 Cul-de-sacs: Discourage the use of cul-de-sacs that do not provide access for active transportation options.***

C.2.1 Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?

Yes  **No**

C.2.2 If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?

Yes  **No**  **N/A**

If the answers to either C.1.2 or C.2.2 are YES, then the project would not conflict with a plan or policies that ensures access for all modes of travel. If the answer to either **C.1.2 or C.2.2 are NO**, the project may conflict with a plan or policies that governs multimodal access to a property. Further analysis must assess to the degree that pedestrians and bicyclists have sufficient public access to the transportation network.

**D. Parking Supply and Transportation Demand Management**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.***

***Mobility Plan 2035 Policy 4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.***



## Plan, Policy, and Program Consistency Worksheet

**Mobility Plan 2035 Policy 4.13** – Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.

D.1 Would the project propose a supply of onsite parking that exceeds the baseline amount<sup>4</sup> as required in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails?

Yes  **No**

D.2 If the answer to D.1. is YES, would the project propose to actively manage the demand of parking by independently pricing the supply to all users (e.g. parking cash-out), or for residential properties, unbundle the supply from the lease or sale of residential units?

Yes  **No**  **N/A**

If the answer to **D.2. is NO** the project may conflict with parking management policies. Further analysis is needed to demonstrate how the supply of parking above city requirements will not result in additional (induced) drive-alone trips as compared to an alternative that provided no more parking than the baseline required by the LAMC or Specific Plan. If there is potential for the supply of parking to result in induced demand for drive-alone trips, the project should further explore transportation demand management (TDM) measures to further off-set the induced demands of driving and vehicle miles travelled (VMT) that may result from higher amounts of on-site parking. The TDM measures should specifically focus on strategies that encourage dynamic and context-sensitive pricing solutions and ensure the parking is efficiently allocated, such as providing real time information. Research has demonstrated that charging a user cost for parking or providing a ‘cash-out’ option in return for not using it is the most effective strategy to reduce the instances of drive-alone trips and increase non-auto mode share to further reduce VMT. To ensure the parking is efficiently managed and reduce the need to build parking for future uses, further strategies should include sharing parking with other properties and/or the general public.

D.3. Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?

The Project is not a land use project, nor is it a Park Neighborhood Recreation Sites, Community Recreation Sites, Regional Parks, and School Playgrounds, as defined in Section 1 of the Service Systems Element - Public Recreation Plan of the City's General Plan. Thus, no minimum bicycle parking requirement is defined per LAMC 12.21 A.16.

**Yes**  **No**

D.4. Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor?

Yes  **No**

D.5 If the answer to D.4. is YES, does the project comply with the City's TDM Ordinance in Section 12.26 J of the LAMC?

Yes  **No**  **N/A**

If the answer to **D.3. or D.5. is NO** the project conflicts with LAMC code requirements of bicycle parking and TDM measures. If the project includes uses that require bicycle parking (Section 12.21 A.16) or TDM (Section 12.26 J), and the project does not comply with those Sections of the LAMC, further analysis is required to ensure that the project supports the intent of the two LAMC sections. To meet the intent of

<sup>4</sup> The baseline parking is defined here as the default parking requirements in section 12.21 A.4 of the Los Angeles Municipal Code or any applicable Specific Plan, whichever prevails, for each applicable use not taking into consideration other parking incentives to reduce the amount of required parking.



Plan, Policy, and Program Consistency Worksheet

bicycle parking requirements, the analysis should identify how the project commits to providing safe access to those traveling by bicycle and accommodates storing their bicycle in locations that demonstrates priority over vehicle access.

Similarly, to meet the intent of the TDM requirements of Section 12.26 J of the LAMC, the analysis should identify how the project commits to providing effective strategies in either physical facilities or programs that encourage non-drive alone trips to and from the project site and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks).

**E. Consistency with Regional Plans**

This section addresses potential inconsistencies with greenhouse gas (GHG) reduction targets forecasted in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS).

E.1 Does the Project or Plan apply one the City’s efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in **Section 2.2.3** of the TAG?  
 Yes  No

E.2 If the Answer to **E.1 is YES**, does the Project or Plan result in a significant VMT impact?  
 Yes  No  N/A

E.3 If the Answer to **E.1 is NO**, does the Project result in a net increase in VMT?  
 Yes  No  N/A

If the Answer to **E.2 or E.3 is NO**, then the Project or Plan is shown to align with the long-term VMT and GHG reduction goals of SCAG’s RTP/SCS.

E.4 If the Answer to **E.2 or E.3 is YES**, then further evaluation would be necessary to determine whether such a project or land use plan would be shown to be consistent with VMT and GHG reduction goals of the SCAG RTP/SCS. For the purpose of making a finding that a project is consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS, the project analyst should consult **Section 2.2.4** of the Transportation Assessment Guidelines (TAG). **Section 2.2.4** provides the methodology for evaluating a land use project's cumulative impacts to VMT, and the appropriate reliance on SCAG’s most recently adopted RTP/SCS in reaching that conclusion.

The analysis methods therein can further support findings that the project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to Section 65080(b)(2)(H) of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.



## Plan, Policy, and Program Consistency Worksheet

**References**

BOE [Street Standard Dimensions S-470-1](#)

[http://eng2.lacity.org/techdocs/stdplans/s-400/S-470-1\\_20151021\\_150849.pdf](http://eng2.lacity.org/techdocs/stdplans/s-400/S-470-1_20151021_150849.pdf)

LADCP [Citywide Design Guidelines](#).

[https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide\\_Design\\_Guidelines.pdf](https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide_Design_Guidelines.pdf)

LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>

Mobility Plan 2035

[https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility\\_Plan\\_2035.pdf](https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf)

SCAG. Connect SoCal, 2020-2045 RTP/SCS, <https://www.connectsocial.org/Pages/default.aspx>

# 3. References

City of Los Angeles. (2022). *City of Los Angeles Transportation Assessment Guidelines (TAG)*.

# LA River Phase IV Bike Path

## CEQA Analysis of Transportation Impacts

CEQA Appendix G Checklist XVII. Transportation, b) Would the project substantially increase hazards due to a geometric design feature or incompatible use?

Prepared for:

Environmental Science Associates (ESA)

Los Angeles Bureau of Street Services (StreetsLA)

Los Angeles Department of Transportation (LADOT)

December 11, 2024





Fehr & Peers conducted a review of the traveled way and shoulder widths in the Project plan set<sup>1</sup> to identify the potential for the Project to **“Substantially increase hazards due to a geometric design feature or incompatible uses”** (CEQA Appendix G, Section XVII, question B). Through coordination with LADOT and StreetsLA, Fehr & Peers reviewed the Project plan set against relevant standards in the following commonly accepted transportation engineering documents:

- California Department of Transportation (Caltrans) *Highway Design Manual* (HDM), Chapter 1000 – Bicycle Transportation Design, Topic 1003 – Bikeway Design Criteria, Section 1003.1 (Class I Bikeways)
- City of Los Angeles Complete Streets Design Guide, Section 4.18: Sidewalk Equestrian Trails

While there are design elements substandard to the above referenced documents (further explained in Table 1), the Project is not anticipated to substantially increase geometric hazards, and thus can be considered as a **less than significant impact** under CEQA.

**Table 1 - Geometric Hazards Review**

Document	Relevant Standard <sup>1</sup>	Project Consistency
<b>Caltrans HDM Chapter 1000, Section 1003.1</b>	The minimum paved width of travel way for a two-way bike path shall be 8 feet, 10-foot preferred.	The proposed traveled way of the bike path is at least 8 feet, consistent with the existing LA River Bike Path directly to the south, to which the Project would connect.
	Where heavy bicycle volumes are anticipated and/or significant pedestrian traffic is expected, the paved width of a two-way bike path should be greater than 10 feet, preferably 12 feet or more.	
	A minimum 2-foot wide shoulder, composed of the same pavement material as the bike path or all weather surface material that is free of vegetation, shall be provided adjacent to the traveled way of the bike path when not on a structure.	In many cases, the shoulder width is less than 2 feet on both sides of the bike path. In several typical sections shown on the plan set, the width from the [middle of] the fence on both sides of the bike path is exactly 12 feet, which would result in a shoulder that is a few to several inches short of 2 feet on both sides. While substandard to the HDM, it is not anticipated that this would substantially increase geometric hazards as to result in a significant transportation impact, as the traveled way is not affected, and a shoulder is still provided.  Additionally, there are several occurrences at which a retaining wall would result in a (south side) shoulder width of less than 2 feet (by several inches). <i>The City of LA design team (Engineers of Record) has prepared a written design-exception to justify this design, which is based on the relatively short distance of these sections, and the fact that the HDM provides provision for less than 2-foot shoulders in other cases (on a structure). While substandard to the HDM, it is not anticipated that this would substantially increase geometric hazards as to result in a significant transportation impact, as the traveled way is not affected, and a shoulder is still provided.</i>
	A minimum 2-foot horizontal clearance from the paved edge of a bike path to obstructions shall be provided	In many cases, there is less than 2 feet on both sides of the bike path between the traveled way and the fence. In several typical sections shown on the plan set, the width from the [middle of] the fence on both sides of the bike path is exactly 12 feet, which would result in distance to obstructions that is a few to several inches short of 2 feet. While substandard to the HDM, it is not anticipated that this would substantially increase geometric hazards as to result in a significant transportation impact, as the traveled way is not affected, and a shoulder is still provided.  Additionally, there are several occurrences at which a retaining wall would result in a (south side) distance to obstructions width of less than 2 feet (by several inches). The City of LA design team (Engineers of Record) has prepared a written design-exception to justify this design, which is based on the relatively short distance of these sections. While substandard to the HDM, it is not anticipated that this would substantially increase geometric hazards as to result in a significant transportation impact, as the traveled way is not affected, and a distance from the traveled way to the obstruction is still provided.
	The vertical clearance to obstructions across the width of a bike path shall be a minimum of 8 feet and 7 feet over shoulder. Where practical, a vertical clearance of 10 feet is desirable.	There are no overhead obstructions along the bike path.
	When a corridor includes equestrian paths and Class I bikeways, the widest possible lateral separation should be provided between the two. A physical obstacle, such as an open rail fence, adjacent to the equestrian trail may be beneficial to induce horses to shy away from the bikeway, as long as the obstacle does not block visibility between the equestrian trail and bicycle path.	The proposed bike path and equestrian trail include an 8.5-foot chain link fence for lateral separation which does not block the visibility between the equestrian trail and the bike path.
<b>LA Complete Streets Design Guide, Section 4.18</b>	A minimum height of 4 feet is recommended for all fences and barriers along trails. A greater height may be permitted for trails adjacent to high-speed roads where traffic may startle horses. Height should be tapered down as trail approaches intersections or end, to maximize horse/rider view.	The Project proposes 8.5-foot chain link fence between the bike path and equestrian trail.  The equestrian trail is separated from CA SR-134 by a 5-foot chain link fence, as well as a hillslope or a retaining wall, depending on the segment.

Source: Fehr & Peers, 2024

Notes:

<sup>1</sup>Standards language are paraphrased for table brevity. See corresponding document for full language.

<sup>1</sup> LA River Bike Path Phase IV, Bureau of Street Services, Department of Public Works, City of Los Angeles, October 4, 2024. This plan set included sheets T-1 and T-2, C-1 through C-8, and C-10 through C-13.