IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section analyzes the Proposed Project's potential impacts on transportation. The technical appendices that support this section include: (1) a Transportation Impact Study Memorandum of Understanding (MOU) approved by the Los Angeles Department of Transportation (LADOT) on May 3, 2018 (contained in Appendix A of Appendix H.2(A) to this Draft EIR); (2) a Traffic Impact Study prepared by Linscott, Law & Greenspan Engineers (LLG) dated July 17, 2019 (Traffic Impact Study) (see Appendix H.2(A) to this Draft EIR); (3) a Vehicle Miles Traveled Analysis (VMT Analysis) based on the LADOT Transportation Assessment Guidelines, prepared by LLG dated November 20, 2019 (see Appendix H.1(B) to this Draft EIR); (4) a supplemental Operational Delay Analysis for Fairfax Avenue & 3rd Street (Delay Analysis), dated February 19, 2020 (see Appendix H.2(B) to this Draft EIR); and (5) the traffic analysis approval letter from LADOT (DOT Case No. CEN 18-47030), dated March 26, 2020 (see Appendix H.1(A) to this Draft EIR). See Appendix H.1 and H.2 to this Draft EIR for all of these documents.

This section summarizes and incorporates by reference the information provided in the VMT Analysis. The VMT Analysis was reviewed and approved by LADOT. The VMT Analysis and LADOT's correspondence letter acknowledging its review and approval are contained in Appendix H.1 to this Draft EIR.

It should be noted that the Traffic Impact Study dated July 17, 2019, was prepared for the Proposed Project based on the LADOT's Transportation Impact Study Guidelines, dated December 2016 (the 2016 Guidelines) that were in effect at the time.[1] The approved MOU and the Traffic Impact Study are contained in Appendix H.2 to this Draft EIR for informational purposes only, as non-CEQA related information, and are not used as a basis for CEQA impact conclusions pursuant to the current CEQA Guidelines and LADOT guidance.

As discussed in more detail below, on July 30, 2019, pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the State's California Environmental Quality Act Guidelines, the City of Los Angeles formally adopted vehicle miles traveled (VMT) as the criteria for determining transportation impacts of development projects under CEQA.

[1] *LLG prepared a Transportation Impact Study Memorandum of Understanding (MOU) for the Proposed Project, which was approved by LADOT on May 3, 2018.*

In conjunction with the adoption of VMT, LADOT issued a revised Transportation Assessment Guidelines document dated July 2019 ("TAG"). Further, LADOT issued a memorandum dated August 9, 2019 which confirms that LADOT will honor executed MOUs that were processed under prior LOS-based guidance. The memorandum also recommends that pending projects also evaluate VMT as part of their transportation analysis. Accordingly, a traffic analysis using the VMT methodology has been prepared for the Proposed Project. Therefore, this EIR Section is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the Proposed Project.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Senate Bill 743

California Senate Bill 743 (SB 743), which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under the California Environmental Quality Act (CEQA). Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement, vehicle miles traveled (VMT) that addresses the state's goals on reduction of greenhouse gas (GHG) emissions, creation of a multi-modal transportation network, and promotion of compact, mixed-use development patterns. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

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

Fully implemented guidelines were originally scheduled to be in place by January 1, 2016. However, an extension has allowed lead agencies until July 1, 2020 to establish an analysis methodology.

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 its TAG (July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

Additionally, on August 9, 2019, LADOT issued guidance on the implementation of the state mandated analysis of VMT:

> *On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines…. To manage this transition LADOT will honor executed MOUs for traffic studies that were processed under the prior LOS-based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects.*

As discussed above, recent changes to CEQA include the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to

estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG. As the provisions of SB 743 are now operative, this EIR Section is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the Proposed Project.

SB 743 also adds Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." A "transit priority area" is defined as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" 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." PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.

The Proposed Project is an infill development involving the demolition of 151,048 square feet of retail land uses and the new construction, use, and operation of a mixed-use project consisting of 331 multi-family residential apartment dwelling units and up to approximately 83,994 square feet of new commercial floor area consisting of an approximately 63,082 square feet of supermarket space, 13,412 square feet of general retail space, and 7,500 square feet of restaurant space. The Project Site is located less than 0.5 mile north of the planned Metro Purple Line Wilshire/Fairfax Station, which is currently under construction and anticipated to be operational by 2023.[2]

Therefore, the Project Site is located in a Transit Priority Area, as defined in PRC Section 21099. As such, pursuant to PRC Section 21099, the Proposed Project's aesthetic and parking impacts shall not be considered significant impacts on the environment. Refer to Section II, Project Description, of this Draft EIR, for a discussion of the Proposed Project's parking.

[2] *Metro, Purple Line Extension Purple Line Fact Sheet, website: https://www.metro.net/projects/westside/ accessed March 2020.*

(2) Regional

(a) Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

(b) Southern California Association of Government's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 2016, the Southern California Association of Governments (SCAG) adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). The 2016-2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016-2040 RTP/SCS, SB 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.[3] Within the 2016 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service

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

frequency during peak commute hours.[4] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[5] As discussed in further detail in Section IV.E, Land Use and Planning, the Project Site is an infill site within a High Quality Transit Area as defined by SCAG[6] and a Transit Priority Area as defined by SB 743.[7]

(3) Local

(a) City of Los Angeles General Plan Framework Element and Mobility Plan 2035

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. As discussed in the Transportation Chapter of the Framework Element, the goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035 (Mobility Plan) in August 2015. The Mobility Plan was readopted in January 2016 and amended in September 2016. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan.

The Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. These key goals are further discussed below:

- Safety First: Crashes, speed, protection, security, safety education, and enforcement.
- World Class Infrastructure: Design, Complete Street Network (walking, bicycling, transit, vehicles, and good movement), bridges, highways, and smart investments.
- Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, and community connection.

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4 *Ibid, p. 189.*
5 *Ibid, p. 189.*
6 *SCAG defines a High Quality Transit Areas (HQTAs) as follows: "areas within one-half mile of a 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."*
7 *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, accessed December 2016.*

- Collaboration, Communication, and Informed Choices: Real-time information, open-source data, transparency, monitoring, reporting, departmental and agency cooperation, database management, parking options, loading and unloading, and goods movement.

- Clean Environments and Healthy Communities: Environment, public health, clean air, and clean fuels and fleets.

Street classifications/standards are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan 2035 has modified the City's street standards to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access. Roadways are now defined as follows in the Mobility Plan:

- Freeways - High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.

- 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 categories:

        - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 mph.

        - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.

    - Avenues pass through both residential and commercial areas and include three categories:

        - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.

        - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.

        - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.

- 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. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.

- Local Streets - Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local Streets can be continuous local streets that connect to other streets at both ends, or non-continuous local streets that lead to a dead-end.

The Mobility Plan also includes the Transit Enhanced Network (TEN), Pedestrian Enhanced Districts (PED), and the Bicycle Enhanced Network (BEN). As defined in the Mobility Plan, the TEN is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within one mile of the network by 2035. PEDs are an analysis of a snapshot in time of areas where pedestrian improvements are prioritized relative to other modes. These areas may be located near schools, transit stations, areas of high pedestrian activity, areas with high collision frequency, or other placemaking opportunity areas. The Mobility Plan proposes to design and implement by 2035 PEDs within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. The BEN is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

(b) City of Los Angeles Municipal Code

(i) Construction Traffic

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

(ii) Parking

Section 12.21.A.4 of the LAMC sets forth parking requirements for development projects based on the types and density of land uses. The Proposed Project would be subject to the applicable parking requirements set forth in LAMC Section 12.21.A.4, as discussed in further detail in Section IV, E, Land Use and Planning.

(c) Vision Zero Action Plan

As described in the Vision Zero Action Plan, Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death.[8] Vision Zero has identified the High Injury Network, a network of streets based on the collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. The Vision Zero Action Plan complements the City's ongoing traffic-safety efforts. For example, between 2013 and 2016, six of the High-Injury Network priority intersections underwent safety improvements and have demonstrated early successes in eliminating traffic deaths and serious injuries. Additionally, the City has secured funding for projects at an additional nine intersections on the High-Injury Network.[9] In the vicinity of the Project Site, W. 3rd Street and S. Fairfax Avenue have been identified in the High Injury Network. However, no specific improvement projects have been proposed for either of these roadways in the Vision Zero Action Plan.

b) Existing Conditions

(1) Project Location

The Project Site is located in the Wilshire Community Plan area of the City of Los Angeles, California. The Wilshire Community Plan area contains 8,954 acres, which is approximately three percent of the land total in the City of Los Angeles. The Wilshire Community Plan area is generally southwest of the Hollywood Freeway (U.S. 101), which is oriented southwest-southeast across the northeast corner of the Wilshire Plan Area at Vermont and Rosewood Avenues. In relation to the Project Site, the Harbor Freeway (I-110) is located 3.3 miles to the east; the Santa Monica Freeway (I-10) is located 2.4 miles to the south; and the San Diego Freeway (I-405) is approximately five miles to the west.

Within the Wilshire Community Plan area, the street pattern is primarily a grid. Notably, south of Wilshire Boulevard and west of Wilton Place, the street grid shifts uniformly towards a northeast/southwest alignment, while east/west streets shift somewhat to a northwest/southeast orientation.

The Metro Purple Line and Red Line subways serve the Wilshire Community Plan area, running along portions of Wilshire Boulevard and Vermont Avenue. It is also noted that the extension of the Metro Purple Line Subway will occur in the vicinity of the Proposed Project. Section 1 of the Purple Line extension will include a station at the intersection of S. Fairfax Avenue and Wilshire Boulevard, approximately one-half mile south of the Project Site.

[8] *City of Los Angeles, Vision Zero Action Plan (2017), January 2017.*
[9] *City of Los Angeles, Vision Zero Action Plan (2017), January 2017, pg 21.*

(2) Existing Project Site

The Project Site is located at 300-370 S. Fairfax Avenue; 6300-6370 W. 3rd Street; and 347 S. Ogden Drive, in the City of Los Angeles. The Project Site is bounded by W. 3rd Street to the north, S. Ogden Drive to the east, Hancock Park Elementary School to the south, and the western portion of the existing Town and Country Shopping Center ("Center") and S. Fairfax Avenue to the west.

The existing Project Site includes the Town and Country Shopping Center. However, the Proposed Project would only develop a portion of the Project Site, which is located on the easterly portion of the existing Center. That area is considered the Development Site and is currently developed with 151,048 square feet of commercial uses including 144,963 square feet of retail floor area and 6,085 square feet of restaurant floor area.

(3) Access and Circulation

(a) Existing Vehicular Site Access

There are several access points to the Project Site. Vehicular access to the parking area serving the Project Site is currently provided via one driveway along the east side of S. Fairfax Avenue, two driveways along the south side of W. 3rd Street, and one driveway along the west side of S. Ogden Drive. In addition, an existing service driveway is provided along the southerly portion of the Project Site, with driveway access via S. Fairfax Avenue and S. Ogden Drive.

(b) Bicycle Access

Bicycle access to the Project Site is facilitated by the City of Los Angeles bicycle roadway network. Existing or proposed bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Proposed Bicycle Routes, Bicycle Friendly Streets, etc.) in the City's 2010 Bicycle Plan are or will be located within an approximate one-half mile radius from the Project Site.[10] It is noted that the greater Wilshire Community Plan area benefits from being relatively flat compared to the hillier community areas. This, combined with the regional connectivity to transit options in the Project Site area, reinforce the availability of bicycle access.

In the vicinity of the Project Site, S. Fairfax Avenue and W. 3rd Street are designated as future bike lanes as part of the Backbone Bikeway Network. Ogden Drive, between

[10] *Source: City of Los Angeles Bicycle Parking Plan; www.bike.lacity.org.*

Colgate Avenue and W. 3rd Street is designated as a future Bicycle Friendly Street (BFS)[11] as part of the Neighborhood Bikeway Network.[12]

As designated in the Bicycle Lane Network Map D2 in Chapter 6 of The Mobility Plan 2035, in the vicinity of the Proposed Project W. 3rd Street is designated as a future Tier 2 Bike Lane and S. Fairfax Avenue is designated as a future Tier 3 Bike Lane.

(c) Regional Highway System

Regional vehicular access to the Project Site is provided by the I-10 (Santa Monica) Freeway and the U.S. 101 (Hollywood) Freeway. Brief descriptions of the I-10 Freeway and the US-101 Freeway are provided in the following paragraphs.

U.S. 101 (Hollywood) Freeway is a north-south freeway that extends across Northern and Southern California. In the vicinity of the Project Site, four mixed-free flow freeway lanes are provided in each direction on the US-101 Freeway. Northbound and southbound ramps on the US-101 Freeway are provided at Vermont Avenue and Silver Lake Boulevard in the vicinity of the Project Site, and are located approximately 5.0 miles east of the Project Site.

I-10 (Santa Monica) Freeway is an east-west freeway that extends across Southern California. In the vicinity of the Project Site, four mixed-flow freeway lanes are provided in each direction on the I-10 Freeway. Eastbound and westbound ramps are provided at S. Fairfax Avenue on the I-10 Freeway in the vicinity of the Project Site, which are located approximately 2.75 miles south of the Project Site.

(d) Local Street System

The following section includes a brief description of the roadways in the Proposed Project vicinity.

La Cienega Boulevard is a north-south oriented roadway located approximately 0.9 miles west of the Project Site. Within the vicinity of the Project Site, , La Cienega Boulevard is designated as an Avenue I in the Mobility Plan. Three through travel lanes are generally provided in each direction on La Cienega Boulevard within the vicinity of the Project Site. Separate exclusive left-turn lanes are provided on La Cienega Boulevard in each direction at major intersections. La Cienega Boulevard is posted for a speed limit of 35 miles per hour within the vicinity of the Project Site.

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[11] *As defined in the 2010 Bicycle Plan, a BFS uses a holistic engineering approach to render a neighborhood street extremely inviting to bicyclists (and pedestrians). By introducing signage, pavement markings, bulb-outs or even traffic diverters, a BFS creates a pleasant and safe environment for relaxed riding, especially for bicyclists more sensitive to motor vehicle traffic.*

[12] *City of Los Angeles, 2010 Bicycle Plan, Appendix D, Citywide Bikeway System Map, adopted March 11, 2011.*

Crescent Heights Boulevard is a north-south oriented roadway located 0.25 miles west of the Project Site. Within the vicinity of the Project Site, Crescent Heights Boulevard is designated as an Modified Avenue III in the Mobility Plan. Two through travel lanes are generally provided in each direction on Crescent Heights Boulevard within the Project vicinity. Crescent Heights Boulevard is posted for a speed limit of 35 miles per hour within the Project vicinity.

S. Fairfax Avenue is a north-south oriented roadway that borders the westerly portion of the existing Center to the west. Within the vicinity of the Project Site, S. Fairfax Avenue is designated as an Avenue II in the Mobility Plan. Two through travel lanes are generally provided in each direction on S. Fairfax Avenue within the vicinity of the Project Site. Separate exclusive left-turn lanes are provided on S. Fairfax Avenue in each direction at major intersections. Separate exclusive right-turn lanes are provided on S. Fairfax Avenue in the northbound direction at the Beverly Boulevard, W. 3rd Street, and W. 6th Street intersections. S. Fairfax Avenue is posted for a speed limit of 35 miles per hour within the vicinity of the Project Site.

S. Ogden Drive is a north-south oriented roadway that borders the Project Site to the east. Within the vicinity of the Project Site, S. Ogden Drive is designated as a Local Street in the Mobility Plan. One through travel lane is generally provided in each direction on S. Ogden Drive within the vicinity of the Project Site. Separate exclusive left-turn and right-turn lanes are provided on S. Ogden Drive in the northbound direction at the 3rd Street intersection. There is no speed limit posted on S. Ogden Drive in the vicinity of the Project Site, thus a speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code.

Stanley Avenue is a north-south oriented roadway located 0.5 miles northeast of the Project Site. Within the vicinity of the Project Site, Stanley Avenue is designated as a Local Street in the Mobility Plan. One through travel lane is generally provided in each direction on Stanley Avenue within the vicinity of the Project Site. South of Beverly Boulevard, Stanley Avenue becomes The Grove Drive. There is no speed limit posted on Stanley Avenue in the vicinity of the Project Site, thus a speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code.

The Grove Drive is a north-south oriented roadway located 0.16 mile east of the Project Site. Within the vicinity of the Project Site, The Grove Drive is designated as a Collector Street in the Mobility Plan. Two through travel lanes are generally provided in each direction on The Grove Drive within the vicinity of the Project Site. North of Beverly Boulevard, The Grove Drive becomes Stanley Avenue. Separate exclusive left-turn and right-turn lanes are provided on The Grove Drive in the northbound direction at the Beverly Boulevard intersection, and in the southbound direction at the 3rd Street intersection. There is no speed limit posted on The Grove Drive in the vicinity of the

Project Site, thus a speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code.

La Brea Avenue is a north-south oriented roadway located 0.9 miles east of the Project Site. Within the vicinity of the Project Site, La Brea Avenue is designated as an Avenue I in the Mobility Plan. Three through travel lanes are generally provided in each direction on La Brea Avenue within the vicinity of the Project Site. Separate exclusive left-turn lanes are provided on La Brea Avenue in each direction at major intersections. La Brea Avenue is posted for a speed limit of 35 miles per hour within the vicinity of the Project Site.

Beverly Boulevard is an east-west oriented roadway located 0.3 miles north of the Project Site. Within the vicinity of the Project Site, Beverly Boulevard is designated as a Modified Avenue I in the Mobility Plan. Two through travel lanes are generally provided in each direction within the vicinity of the Project Site . Separate exclusive left-turn lanes are provided on Beverly Boulevard in each direction at major intersections. A separate exclusive right-turn lane is provided on Beverly Boulevard in the eastbound direction at the S. Fairfax Avenue intersection. Beverly Boulevard is posted for a speed limit of 35 miles per hour within the Project vicinity.

3rd Street is an east-west oriented roadway that borders the Project Site to the north. Within the vicinity of the Project Site, 3rd Street is designated as an Avenue II in the Mobility Plan. Two through travel lanes are provided in each direction on 3rd Street within the vicinity of the Project Site. Separate exclusive left-turn lanes are provided on 3rd Street in each direction at major intersections. Separate exclusive right-turn lanes are provided on 3rd Street in the eastbound direction at the La Cienega Boulevard and La Brea Avenue intersections, and in the westbound direction at the S. Fairfax Avenue and The Grove Drive intersections. 3rd Street is posted for a speed limit of 35 miles per hour within the vicinity of the Project Site.

Colgate Avenue is an east-west oriented roadway located south of the Project Site. Within the vicinity of the Project Site, Colgate Avenue is designated as a Local Street in the Mobility Plan. One through travel lane is generally provided in each direction on Colgate Avenue within the vicinity of the Project Site. There is no speed limit posted on Colgate Avenue in the Project vicinity, thus a speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code.

(e) Transit Services

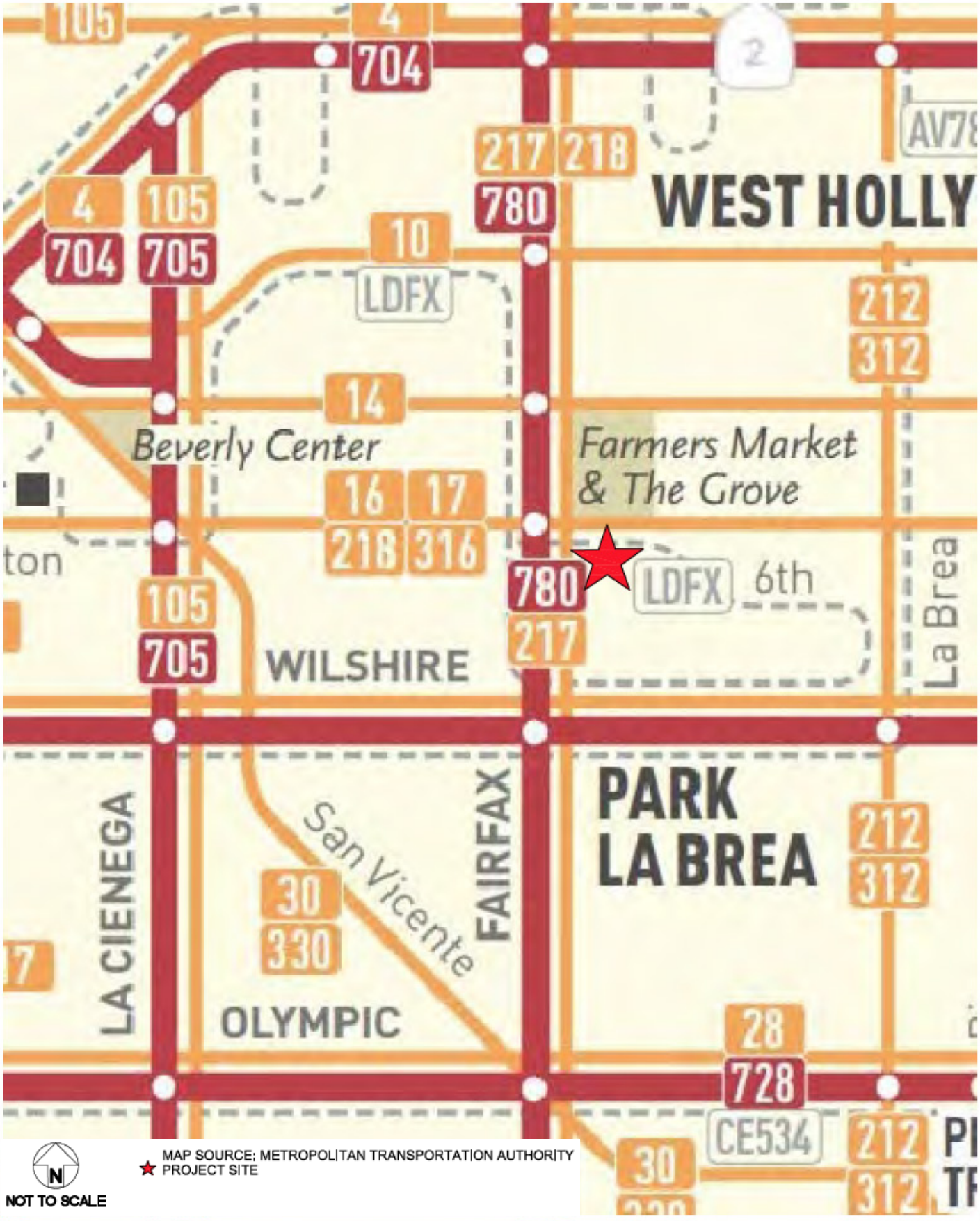
Public transit service within the vicinity of the of the Project Site is currently provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the City of Los Angeles Department of Transportation (LADOT). A summary of the existing transit service, including the transit route, and number of buses that occur within the peak hour

for each route is presented in Table IV.I-1, Existing Public Transit Routes. The existing public transit routes in the Project Site vicinity are illustrated in Figure IV.I-1.

Table IV.I-1
Existing Public Transit Routes

Route	Destinations	Roadways(s) Near Site	No. of Buses During Peak Hour		
			DIR	AM	PM
Metro 14	Downtown Los Angeles to Beverly Hills (via Beverly Boulevard)	Beverly Boulevard	EB	6	7
			WB	11	9
Metro 16/17/316	Downtown Los Angeles to Century City (via W. 3rd Street and Robertson Boulevard)	3rd Street	EB	10	12
			WB	16	14
Metro 105	Vernon to West Hollywood (via La Cienega Boulevard and Vernon Avenue)	La Cienega Boulevard	NB	4	3
			SB	3	4
Metro 212/312	Hollywood/Vine Station to Hawthorne/ Lennox Station (via S. La Brea Avenue)	La Brea Avenue	NB	9	5
			SB	5	8
Metro 217	Vermont/Sunset Station to Howard Hughes Center (via S. Fairfax Avenue and La Cienega Boulevard)	Fairfax Avenue	NB	5	7
			SB	4	5
Metro 218	Studio City to Beverly Hills (via Laurel Canyon Boulevard)	Fairfax Avenue and 3rd Street	NB	2	2
			SB	2	2
Metro Rapid 705	Vernon to West Hollywood (via La Cienega Boulevard and Vernon Avenue)	La Cienega Boulevard	NB	7	5
			SB	2	4
Metro Rapid 780	Pasadena to Washington/Fairfax Transit Hub (via Hollywood Boulevard and Colorado Boulevard)	S. Fairfax Avenue	EB	5	5
			WB	5	5
Dash Fairfax	Roundtrip from Cedars-Sinai Medical Center (via S .Fairfax Avenue and Melrose Avenue)	S. Fairfax Avenue and W. 3rd Street	EB	2	2
			WB	2	2
			TOTAL	**100**	**101**

Sources: Los Angeles County Metropolitan Transportation Authority (Metro), City of Los Angeles Department of Transportation (LADOT) websites, 2019.
Los Angeles Department of Transportation (LADOT DASH) website, 2019.
Linscott, Law & Greenspan, Engineers; Transportation Impact Study, 6300 W. 3rd Street Mixed-Use Project, City of Los Angeles, California, July 17, 2019.See Appendix H.2(A) Non-CEQA Traffic Impact Study.



Source: Linscott, Law & Greenspan, Engineers, July 9, 2019.

Figure IV.I-1
Existing Public Transit Routes

Metro is currently constructing the extension of the Metro Purple Line subway in the vicinity of the Project Site. Section 1 of the Purple Line extension includes a station at the Fairfax Avenue / Wilshire Boulevard intersection, which is located approximately one half mile south of the Project Site. Metro currently estimates service on the Section 1 segment of the Purple Line will begin in 2023, which is also the estimated build-out and occupancy year of the Project.[13] Accordingly, it is reasonable to anticipate that future residents, patrons, and employees of the Proposed Project will utilize the Purple Line when it becomes operational. This anticipated transit usage would reduce the number of vehicle trips generated by the Project. Even though operation of the Purple Line's Section 1 is scheduled to occur concurrently with the occupancy of the Proposed Project, the VMT Analysis conservatively do not include any reductions in the potential Project-related vehicle trip generation that would likely occur due to future users of the Project Site utilizing the subway system.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G to the state *CEQA Guidelines*, the Proposed Project would have a significant impact on traffic or transportation if it would cause any of the following conditions to occur:

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

Threshold b) ***Conflict with 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); or***

Threshold d) ***Result in inadequate emergency access.***

b) Methodology

The State of California Office of Planning and Research updated Appendix G of the State CEQA Thresholds which establishes new criteria for analyzing traffic impacts based on vehicle miles traveled in lieu of the level of service methodology in January 2019. Pursuant to Section 15064.3(c), the provisions of this section apply statewide beginning

[13] *Metro, Purple Line Extension Purple Line Fact Sheet, accessed July 2019.*

on July 1, 2020. The City adopted the LADOT TAG which includes the updated CEQA methodology and significance thresholds as directed under SB 743 on July 30, 2019. To address the new VMT methodology, the VMT Analysis was prepared for the Proposed Project.[14] Accordingly, the following analysis addresses the Proposed Project's traffic impacts utilizing VMT methodology, as discussed below. The Traffic Impact Study, which contains an LOS roadway analysis and a construction traffic impact analysis is provided in Appendix H.2(A) for informational purposes only as a non-CEQA analysis, and is not used as a basis for determining the significance of impacts under CEQA.

(1) Plan Consistency

The City of Los Angeles has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. Table 2.1-1: City Documents that Establish the Regulatory Framework, in LADOT's updated TAG, identified City plans and policies to be reviewed for consistency to the extent they are applicable to a specific project.

Plan consistency assesses whether a project would conflict with an adopted program, policy, plan, or ordinance that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance.

Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies. In accordance with the 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.

(a) Screening Analysis

To help guide whether a project conflicts with the City's circulation system policies, the TAG provides a list of screening questions to assist in identifying key policy documents that may be relevant to a project. The screening table and applicable plan consistency analysis is provided under the Project Impacts heading below, in response to Threshold Question a. Table IV.I-2, below, provides responses to the list of policy related guiding questions, as recommended by LADOT, in order to help determine whether the project conflicts with the City's circulation system policies. If the answer is yes to a question, an analysis of the Proposed Project's consistency with the corresponding policy may be

[14] *The Supplemental Traffic Analysis - VMT Analysis, prepared by LLG Engineers, dated November 20, 2020 is provided in Appendix H.1(B) to this EIR.*

warranted. A 'no' answer does not determine a conflict, but rather that relevant existing plans, policies and programs to that guiding question are not applicable to the Proposed Project. As appropriate, a detailed discussion of the relevant programs and policies referenced in the TAG and their applicability to the Proposed Project is discussed below.

(2) VMT 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. 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 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 its TAG in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15 percent below the existing average work VMT per employee for the APC area in which it's located.

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

LADOT has developed a VMT Calculator tool to assess a project's impacts under the VMT methodology. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

(a) Travel Behavior Zone

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

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

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

(b) Mixed-Use Development Methodology

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

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

- Household size

(c) Travel Demand Forecasting

The VMT Calculator determines a Project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the project's VMT.

(d) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources. A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

(e) Transportation Demand Management Measures

Additionally, the VMT Calculator 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).

(f) Screening analysis

For the purpose of determining whether a VMT analysis is required, a project's daily vehicle trips should be estimated using the VMT Calculator tool or the most recent edition

of the ITE Trip Generation Manual. If existing land uses are present on the project site or there were previously terminated land uses that meet the criteria for trip credits described in the trip generation methodology discussion below, the daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT calculator and subtracted from the project's daily vehicle trips to determine the net increase in daily vehicle trips. The screening analysis is provided under the Project Impacts subheading below.

(3) Geometric Design Features

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. The TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Proposed Project Site Plan, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the Proposed Project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

(4) Emergency Access

The analysis of the Proposed Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. A determination was made pursuant to the *thresholds of significance (d)*, below, regarding the potential for these features of the Proposed Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c) Project Design Features

The following traffic-related project design features (PDF)s are proposed to be implemented as part of the Proposed Project.

PDF-TRAFFIC-1 The Applicant will, prior to construction, develop a Construction Traffic Control/Management Plan (the "Plan") to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian

circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Proposed Project. The Plan will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable.

PDF-TRAFFIC-2 No less than two weeks prior to the initiation of construction activities, the Project Manager for the Proposed Project or their designee, will notify the LAUSD Transportation Branch of the expected start and ending dates for Project construction activities that may affect traffic, and school bus routes in effect at that time, near the Hancock Park Elementary School campus. The following language will be incorporated into the contractor specifications and work program:

- Site access and exit will prohibit construction vehicles and haul trucks from utilizing Colgate Avenue.
- Construction activities will not preclude school buses from having unrestricted access to the campus.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors will install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Contractors will maintain ongoing communication with LAUSD school administrators, providing notice at least two weeks in advance of construction activities to forewarn children and parents when existing vehicle or pedestrian routes to school may be constrained.
- Parents dropping off children will have access to the passenger loading areas on Colgate Avenue fronting Hancock Park Elementary School.

PDF-TRAFFIC-3 The following language will be incorporated into the contractor specifications and work program:

- No staging or parking of construction-related vehicles, including worker-transport vehicles, shall occur on or immediately adjacent to the Hancock Park Elementary School campus.
- Funding for crossing guards at the contractor's expense is required when construction-related activities may affect school crossings.
- Barriers and/or fencing will be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors will be required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Screening Questions

As discussed above, the TAG provides a list of screening questions to assist in identifying key policy documents that may be relevant to a project. The screening table and applicable plan consistency analysis is provided in Table IV.I-2, below.

Table IV.I-2
Questions to Determine Project Applicability to Plans, Policies and Programs

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
		Existing Plan Applicability	
1	Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone?	LAMC Sec.12.37.	**Yes.** The Project Site has frontage directly on Fairfax Avenue and W. 3rd Street, both of which are classified as Avenue II roadways under the Mobility Plan 2035. As such, an analysis of the Proposed Project's consistency with LAMC Section 12.37 is provided below.
2	Is the Project Site along any network identified in the City's Mobility Plan?	Mobility Plan Policies 2.3 through 2.7.	**Yes.** West 3rd Street and S. Fairfax Avenue in the vicinity of the Project Site are designated as Moderate Transit Enhanced Streets in the Mobility Plan 2035's Transit Enhanced Network Map. As such, an analysis of the Proposed Project's consistency with Mobility Plan Policies 2.3 through 2.7 is provided below.
3	Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035?	Mobility Plan – Street Classifications; Street Designations and Standard Roadway Dimensions, and Mobility Plan Policy 2.17: Street Widenings.	**Yes.** The Proposed Project would provide a 15-foot sidewalk with a 13-foot dedication on West 3rd Street. As such, an analysis of the Proposed Project's consistency with the Mobility Plan's policies for Street Classifications; Street Designations and Standard Roadway, Dimensions, and Mobility Plan Policy 2.17 Street Widenings is provided below.

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
4	Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program?	N/A	**No.** The nearest bus stop is located on the south side of W. 3rd Street adjacent to the Citibank, which is not a part of the Development Site. Thus, the Proposed Project does not require placement of transit furniture. As such, the City's Coordinated Street Furniture and Bus Bench Program does not apply.
5	Is the Project Site in an Identified Transit Oriented Community?	Mobility Plan Transit Enhanced Network, Mobility Plan Pedestrian Enhanced Districts, and Transit Oriented Communities (TOC) Guidelines.	**Yes.** The Project Site is located within a Tier 3 Transit Oriented Community.[15] As such, an analysis of the Proposed Project's consistency with the Mobility Plan's TEN, PED, and TOC Guidelines is provided below.
6	Is the Project Site on a roadway identified in the City's High Injury Network?	Vision Zero Action Plan.	**Yes.** The Project Site has frontage directly on W. 3rd Street, which is identified in the City's High Injury Network in the City's Vision Zero Action Plan (2017).[16] As such, consistency with the City's policies and programs related to the High Injury Network Policies and Vision Zero Action Plan is provided below. As such, consistency with the City's policies and programs related to the High Injury Network Policies and Vision Zero Action Plan is provided below.
7	Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	Mobility Plan Policy 2.1: Adaptive Reuse of Streets; Mobility Plan Policy 2.10: Loading Areas; Mobility Plan Policy 3.5 Multi-Modal	**No**. The Proposed Project does not propose repurposing existing curb space. As such, no further analysis is required.

[15] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed July 2019.*

[16] *City of Los Angeles, Vision Zero Action Plan (2017), January 2017 (at pages 18-19).*

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
		Features; Mobility Plan Policy 3.8 Bicycle Parking; Mobility Plan Policy 4.13 Parking and Land Use Management; and Mobility Plan Policy 5.4 Clean Fuels and Vehicles.	
8	Does the Project propose narrowing or shifting existing sidewalk placement?	Mobility Plan Policy 2.3: Pedestrian Infrastructure; 3.1: Access for All; Pedestrian Enhanced Districts, Mobility Plan Program ENG 19: Mobility Plan Policy 2.17: Street Widenings.	**No**. The Proposed Project does not propose narrowing or shifting existing sidewalks. As such, no further analysis is required.
9	Does the Project propose paving, narrowing, shifting or removing an existing parkway?	Mobility Plan Policy 5.5: Green Streets, Sustainability pLAn.	**No**. The Proposed Project does not propose modification of an existing parkway. As such, no further analysis is required.

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
10	Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility)	Mobility Plan – Bicycle Enhanced Network Policy 4.15, public hearing process.	**No**. The Proposed Project will not modify, remove, or otherwise affect existing bicycle infrastructure. Furthermore, the Project Site does not front any street segment identified on the Bicycle Enhanced Network in the Network Concept Maps of the Mobility Plan. As such, no further analysis is required.
11	Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access?	Mobility Plan Policy 3.9: Increased Network Access; Mobility Plan Programs ENG.9, PL.1, PL.13, and PS.3.	**No**. The Project Site is not adjacent to an alley. The service driveway behind the Project Site is not an alley pursuant to the applicable street standards. As such, no further analysis is required.
12	Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	Mobility Plan Policy 3.10 Cul-de-sacs.	**No**. The Project Site is not located adjacent to an existing cul-de-sac. As such, no further analysis is required.

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
		Access: Driveways and Loading	
13	Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)?	Mobility Plan Programs PL.1; PK.10; Citywide Design Guideline Policy 4.1.02.	**No**. The Proposed Project would not introduce a new driveway or loading access along street frontages classified as an Avenue or Boulevard. The Proposed Project would remove one existing driveway on W. 3rd Street that fronts the Project Site. Additionally, the Proposed Project's new loading and access driveways are located on S. Ogden Drive, which is classified as a Local Street in the Mobility Plan 2035. As such, no further analysis is required.
14	If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	Mobility Plan Program PL.1; Manual of Policies and Procedures Section 321: Driveway Design.	**Not Applicable.** As noted above, in response to Screening Question 13, the Proposed Project does not propose any new driveways or loading access along an arterial Avenue or Boulevard.
15	Does the Project Site include a corner lot? (avoid driveways too close to intersections)	Citywide Design Guidelines Policy 4.1.01.	**Yes**. The Project Site includes a corner lot at the intersection of W. 3rd Street and S. Ogden Drive and S, Fairfax and W. 3rd Street. As such, an analysis of the Proposed Project's consistency with Citywide Design Guidelines Policy 4.1.01 is provided below.
16	Does the Project propose driveway width in excess of City standard?	Manual of Policies and Procedures Section 321: Driveway Design.	**Yes**. The Proposed Project includes two new loading driveways and two new driveways to access the parking garage on S. Ogden Drive. Additionally, the existing southerly driveway on S. Ogden Drive would remain in place and would connect to the parking structure. As such, an analysis of the Proposed Project's consistency with DOT's Manual of Policies and Procedures Section 321 is provided below.
17	Does the Project propose more driveways than required by City maximum standard?	Manual of Policies and Procedures – Section 321: Driveway Design.	**No**. LADOT's Manual of Policies and Procedures, Section 321, specifies the maximum number of driveways along arterial frontages. The Proposed Project's driveways are located on S. Ogden Drive, a local street, and would thus not occur on an arterial frontage. As such, no further analysis is required.

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
18	Are loading zones proposed as part of the Project?	Mobility Plan 2.10 Loading Areas; Mobility Plan Programs PK.1; PK.7; PK.8; and Manual of Policies and Procedures - Section 321: Driveway Design.	**Yes**. Loading zones are proposed internal to the Project Site within the parking garage and will be accessible via two loading driveways on S. Ogden Drive. As such, an analysis of the Proposed Project's consistency with Mobility Plan Policy 2.10 Loading Areas, and Mobility Programs PK.1, PK.7, and PK.8, and DOT's Manual of Policies and Procedures Section 321 is provided below.
19	Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building?	Mobility Plan Policy 2.10 Loading Areas;	**Yes**. Passenger drop-off zones or areas are proposed within the ground floor of the parking structure. The drop off area is internal to the parking structure and as such would not impede vehicle movement on the surrounding streets. Therefore, an analysis of consistency with Mobility Plan Policy 2.10 is provided below.
20	Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)?	Mobility Plan Policy 2.3: Pedestrian Infrastructure; Mobility Plan Policy 3.9: Increased Network Access.	**No.** The Proposed Project does not propose to modify, limit or remove public access to a public right-of-way. As such, no further analysis is required.

Based on the screening questions above, the following plans, policies, and programs apply to the Proposed Project: LAMC Section 12.37; Mobility Plan Street Classifications, Street Designations and Standard Roadway Dimensions; Mobility Plan Policies 2.3 through 2.7, 2.10, and 2.17; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced District, and Bicycle Enhanced Network Programs; Mobility Plan Programs PK.1, PK.7, PK.8, PK.10, and Transit Oriented Community Guidelines; Vision Zero Action Plan; Citywide Design Guidelines Policy 4.1.01; and Manual of Policies and Procedures Driveway Design Section 321: Driveway Design. Accordingly, an analysis of these applicable elements is provided below under subheading d) Analysis of Project Impacts.

Based on the screening questions in Table IV.I-2 herein, Questions to Determine Project Applicability to Plans, Policies and Programs, the following presents a consistency analysis of the relevant and applicable plans, policies, and programs that are identified in Table 2.1-2 of the TAG.

(b) Los Angeles Municipal Code

LAMC Section 12.37 pertains to development or expansion of buildings along highways and collector streets, and local streets that intersect. The Project Site has frontage directly on S. Fairfax Avenue and W. 3rd Street, both of which are classified as Avenue II roadways in the Mobility Plan. South Ogden Drive, which intersects with W. 3rd Street is designated as a local street in the Mobility Plan.

S. Fairfax Avenue (Avenue II): S. Fairfax Avenue adjoins the Project Site to the west. S. Fairfax Avenue has a total designated right-of-way width standard of 86 feet (43 foot half width) and a designated roadway width of 56 feet (requiring a 28 foot half-width roadway from the centerline) with a 15 foot sidewalk. South Fairfax Avenue currently has a half width of 30 feet on the east side where it fronts the Project Site with sidewalk width that ranges from five to 10 feet. Thus, a dedication of 13 feet would be required to conform to the applicable roadway standards. However, S. Fairfax Avenue is not within the proposed Development Site and no improvements or new buildings are proposed along S. Fairfax Avenue. Furthermore, the existing Whole Foods building and Citi Bank building, which are proposed to remain in place, would preclude any dedications or street widenings in this area. Because no development would occur along S. Fairfax Avenue, and the Development Site is not adjacent to it, no dedications along this frontage are needed or required.

W. 3rd Street (Avenue II): West 3rd Street adjoins the Project Site to the north. West 3rd Street has a total right-of-way width standard of 86 feet (43 foot half-width) and a designated roadway width of 56 feet (requiring a 28 foot half width roadway from centerline) with a 15 foot sidewalk. West 3rd Street currently has a half width of 30

feet on the south side of the roadway fronting the Project Site with a five foot sidewalk. Thus, a dedication of 13 feet would be required to conform to the applicable roadway standards. The Proposed Project would provide a 13 foot dedication along the portion of W. 3rd Street fronting the Development Site to provide a 15 foot wide sidewalk. As such, the Proposed Project would be consistent with the Mobility Plan's street and sidewalk standards on W. 3rd Street.

S. Ogden Drive (Local Street): South Ogden Drive adjoins the Project Site to the east. South Ogden Drive has a total right-of-way width standard of 60 feet (30 foot half-width) and a designated roadway width of 36 feet (requiring an 18 foot half width roadway from centerline) with a 12 foot sidewalk. South Ogden Drive currently has a half width of 30 feet on the west side of the roadway fronting the Project Site with a 10-foot wide sidewalk. As such, the Proposed Project would include a two-foot dedication to provide for a 12-foot sidewalk. Therefore, the Proposed Project would be consistent with the Mobility Plan's street and sidewalk standards on S. Ogden Drive.

(b) Mobility Plan 2035 Consistency Analysis

The Transportation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. In general, the Proposed Project would not impede or impair the City's ability to implement the five broad goals of the Mobility Plan 2035 relating to: (1) public safety, (2) infrastructure networks, (3) providing accessibility for all Angelenos, (4) ensuring departmental and agency cooperation, and (5) providing for a clean environment. Specifically, these goals are as follows:

(1) Public Safety – To design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode choice;

(2) Infrastructure Networks - Design, Complete Streets Network (walking, bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments;

(3) Providing accessibility for all Angelenos - Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system;

(4) Ensuring departmental and agency cooperation - Real-time information, open-source data, transparency, monitoring, reporting, departmental and agency cooperation, database management, parking options, loading and unloading, goods movement; and

(5) Providing for a clean environment and healthy communities –Environment, public health, clean air, clean fuels and fleets.

As noted above the Proposed Project would not conflict with the designated street standards as specified in the Mobility Plan 2035. Based on the initial screening responses in Table IV.I-2, above, a discussion of the Proposed Project's consistency with the applicable Mobility Plan Policies and Programs is provided as follows.

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: The Proposed Project would provide high quality pedestrian access around the Development Site as it would accommodate the Mobility Plan's standard sidewalk widths on W. 3rd Street and Ogden Drive. On W. 3rd Street, the Proposed Project would increase the width of the existing five foot- wide sidewalk and provide a 15-foot wide sidewalk post-development. On S. Ogden Drive, the Project would provide a 2-foot dedication to widen the existing 10-foot wide sidewalk to provide a 12-foot sidewalk in conformance with the sidewalk standards for a local street. Additionally, the Proposed Project would facilitate pedestrian access between S. Ogden Drive and new and existing uses located on the Project Site through a pedestrian portal located on the ground level of the new parking structure. This accessway would provide through access to the Center from S. Ogden Drive and would thus shorten the distance of travel from pedestrians accessing the retail shops within the Project Site from the east (and south of W. 3rd Street), and would eliminate pedestrian-vehicle conflicts on W. 3rd Street which experiences a higher volume of vehicular traffic. The project plans include substantial improvements to the streetscape and landscape around the Development Site, which include new trees, seating areas, and enhanced landscape compared to the existing condition. Additionally, by providing ground floor retail uses built to the property line with direct access to W. 3rd Street, the proposed Project would activate and improve the pedestrian environment. These features would result in a high-quality pedestrian realm and a comfortable walking environment. Additionally, the Proposed Project would satisfy all street lighting requirements as conditioned by the Bureau of Engineering. Therefore, the Proposed Project would not conflict with Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Proposed Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service: While this is a citywide policy, the Project would not conflict with its implementation. West 3rd Street is identified as a Moderate Transit

Enhanced Street in the Mobility Plan.[17] As noted in the Mobility Plan, transit enhanced streets may receive a number of enhancements to improve line performance and/or the overall user experience for people who walk and take transit. Enhancements may range from streetscape improvements to make walking safer and easier, to transit shelters, or bus lanes. As the Proposed Project would conform to the Mobility Plan's street and sidewalk standards along W. 3rd Street, the Proposed Project would not conflict with any future transit improvements or enhancements within the right-of-way.

In addition, construction activities will not result in the temporary or permanent loss of bus stops or rerouting of transit lines.

Public transit service within the vicinity of the Proposed Project is currently provided by Metro and the LADOT. As concluded in the Traffic Impact Study, the Proposed Project is forecast to generate demand for 7 transit trips during the AM peak hour and 4 transit trips during the PM peak hour. Nine transit lines and routes are provided adjacent to or in close proximity to the Project Site, which provide services for an average of generally 100 buses during the AM peak hour and roughly 101 buses during the PM peak hour. Therefore, based on the above calculated AM and PM peak hour trips, the new transit trips generated by the Proposed Project would not materially affect the existing or future transit performance and reliability. Therefore, the Proposed Project would not conflict with Policy 2.5.

Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities: While this is a citywide policy, the Project would support its implementation. As discussed above under subheading *2.b)(3)(c), Bicycle Access*, S. Fairfax Avenue and W. 3rd Street are designated as future bike lanes as part of the Backbone Bikeway Network established in the 2010 Bicycle Plan. Ogden Drive, between Colgate Avenue and W. 3rd Street is designated as a Bicycle Friendly Street and is part of the Neighborhood Bikeway Network. Additionally, in the vicinity of the Proposed Project, the Mobility Plan 2035 designates W. 3rd Street as a Tier 2 Bike Lane and S. Fairfax Avenue as a Tier 3 Bike Lane. The Proposed Project would not result in any changes to the street widths or dimensions on S. Fairfax Avenue, W. 3rd Street, or S. Ogden Drive and thus would not impact future bike lanes proposed on these roads. The Development Site would be developed in a manner that is consistent with the planned roadway and sidewalk widths as specified in the Mobility Plan 2035 for W. 3rd Street and S. Ogden Drive. Additionally, in support of the City's policies to increase access to bicycle facilities, and consistent with bicycle parking requirements specified in the LAMC, the Proposed Project would provide 258 bicycle

[17] *City of Los Angeles, Mobility Plan 2035, Transit Enhanced Network Map B, at page 136.*

parking spaces on the Development Site, including 200 long-term spaces and 58 short-term spaces. Therefore, the Proposed Project would not conflict with Policy 2.6.

Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Regional access to the Project Site is provided by the Santa Monica Freeway (I-10) located approximately 2.5 miles to the south and the Hollywood Freeway (US-101) located approximately three miles to the northeast of the Project Site. The Proposed Project would not result in any changes to the local street patterns or impact accessibility to the freeway system. Therefore, the Proposed Project would not conflict with Policy 2.7.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: Off street loading areas are currently provided on the south side of the Project Site through a driveway that connects S. Fairfax Avenue to S. Ogden Drive. This private driveway and loading area will remain in place post-development. In addition, the proposed new mixed-use commercial/retail structure within the Development Site would provide for structured parking and two new loading docks with driveways off of S. Ogden Drive, a local street. As such, loading activities would be accommodated on-site and would not encroach onto the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension: While this is a citywide policy that does not apply directly to the Proposed Project, the Proposed Project would not conflict with it. As discussed above in the analysis for LAMC Section 12.37, in accordance with the Mobility Plan, W. 3rd Street adjacent to the Project Site requires a 28-foot half-width roadway and is currently improved with a 30 foot roadway width. Although no street widening is proposed as part of the Proposed Project, the Proposed Project includes a 13-foot dedication to allow for a future 15 foot sidewalk, which would be provided as part of the Proposed Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.

Policy 4.13 Parking and Land Use Management - Balance on-street and off-street parking supply with other transportation and land use objectives: The Proposed Project proposes off-site parking in accordance with the applicable parking requirements of the LAMC. As summarized in Table II-5 in Section II, Project Description, pursuant to the LAMC parking requirements, the Proposed Project is required to provide a minimum of 892 parking spaces, including 511 for the residential uses and a 381 for the commercial uses. The Proposed Project would provide a total of 966 parking spaces, including 511

allocated to the residential uses and 485 spaces for the commercial uses and residential guest spaces. As such, the Proposed Project would meet the minimum parking requirements of the LAMC within the Development Site. While the Proposed Project would result in a surplus of 104 parking spaces above the code minimum, these spaces are proposed to meet the anticipated demand for on-site parking and would accommodate the shared parking demand of the commercial uses and guest spaces associated with the residential component. Additionally, adequate surface parking within the western portion of the Project Site would be retained to meet the minimum code-required parking requirements for the retail uses to remain within the western portion of the Project Site that is not included within the proposed Development Site. Thus, the Project Site as a whole would be code compliant with respect to on-site parking. As such, the Proposed Project would not oversupply parking in a manner that would encourage vehicle use. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.

(i) Transit Enhanced Network

As noted in screening question 2, in Table IV.I-2 above, West 3rd Street in the vicinity of the Project Site is designated as a Moderate Transit Enhanced Street in the Mobility Plan 2035's Transit Enhanced Network Map. As noted in the Mobility Plan, transit enhanced streets may receive a number of enhancements to improve line performance and/or the overall user experience for people who walk and take transit. Enhancements may range from streetscape improvements to make walking safer and easier, to transit shelters, or bus lanes. The Proposed Project would provide a 15 foot sidewalk on the frontage of the Development Site along W. 3rd Street and a 12-foot wide sidewalk on S. Ogden Street and conforms to the right-of-way street width standards as specified in the Mobility Plan. In addition, the Project would enhance the streetscape around the periphery of the Development Site with landscaping, seating areas, improved sidewalks, and lighting created by the retail storefront windows where the ground floor retail fronts the sidewalk and streets. To the extent applicable, new street lighting fixtures would be installed as required in accordance with City standards. Additionally, the Project would demolish the existing surface parking lot on the Development Site and construct a new mixed-use development, which will generally improve the overall user experience for people who walk or take transit. As such, the Proposed Project would not preclude the City from implementing transit-related enhancements along the Project's street frontages. Therefore, the Proposed Project would not conflict with the Mobility Plan's Transit Enhanced Network.

(c) Pedestrian Enhanced District

As discussed above, the Mobility Plan proposes to design and implement by 2035 PEDs within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a

prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. In the vicinity of the Proposed Project Site, S. Fairfax Avenue and W. 3rd Street are designated as pedestrian segments on the PED Map F (see Map F in Appendix D to the 2035 Mobility Plan). As discussed above, the Proposed Project would provide a 15-foot sidewalk with a 13-foot dedication on West 3rd Street and a 12-foot sidewalk with a two-foot dedication on S. Ogden Drive in accordance with the Mobility Plan policies and street classification standards. Thus, the Proposed Project would not conflict with the City's policies and programs for future enhancements within the PED along S. Fairfax and W. 3rd Street.

(d) Mobility Plan Program PK.1

PK.1 Creative Parking Solutions. Work with communities, businesses, and organizations to identify and implement creative strategies to resolve parking conflicts in areas with high-parking demand: Upon completion of the Proposed Project, the Project Site would include a total of 1,146 parking spaces which includes a total of 996 parking spaces within a new parking structure within the Development Site to be constructed as part of the Proposed Project plus 150 restriped surface parking spaces for the 63,688 square feet of existing commercial/retail spaces that is to remain in the Center. The Proposed Project would provide the number of LAMC code required parking spaces for the Proposed Project and will maintain the minimum number of code-required parking spaces within the Center to satisfy the LAMC code requirements for retail uses that are within the Project Site but outside of the proposed Development Site. As such, the Proposed Project would not conflict with this program.

(e) Mobility Plan Program PK.7

PK.7 Off-Street Loading. In non-industrial areas, require off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings and undergoing extensive renovations and/or expansion, whenever practical: The Proposed Project is a mixed-use project with residential and commercial retail land uses. The Proposed Project's commercial land uses would be serviced by two new loading docks proposed along S. Ogden Drive. In addition, the Center is currently improved with a service driveway and loading dock area along the Project Site's southerly property boundary, which is accessed via S. Fairfax Avenue to the west and S. Ogden Drive to the east. This service driveway and loading dock area will be maintained to continue service to the retail uses in the Center, but will be converted to a one-way easterly drive entering on S. Fairfax Avenue and exiting on S. Ogden Drive. As such, the Proposed Project would accommodate new loading and unloading activities on-site, and would not conflict with this program.

(f) Mobility Plan Program PK.8

PK.8 On-Street Loading. Encourage the designation of on-street loading areas, through removal of curb parking, in established industrial areas where off-street loading facilities are lacking. Update the Commercial Loading Zone Ordinance (see B-2, page 6, 2-14 of Mayor's Task Force-Mar 2004): This program is a citywide program and is not directly applicable to the Proposed Project. However, implementation of the Proposed Project would not preclude the City from implementing this program in the project area. Further, as discussed above, all loading would be provided on-site within the interior of the proposed parking garage. As such, no conflict with this program would occur.

(g) Mobility Plan Program PK.10

PK.10 Pedestrian Improvement Incentives. Establish an incentive program to encourage projects to retrofit parking lots, structures and driveways to include pedestrian design features: This program is a citywide program to establish an incentive program for developers to encourage pedestrian design features. While not directly applicable to the Proposed Project, the design and implementation of the new sidewalks, new streetscape and landscaping, accessways, and driveways would comply with the City's applicable requirements, including ADA accessibility and emergency access requirements as set forth by the LAFD. Additionally, construction activities would not preclude pedestrian or bicycle access to the Project Site because construction activities will only occur within the Development Site on the eastern portion of the Project Site. Construction equipment storage and staging would occur primarily within the Development Site with potential limited use of adjoining portions of the Project Site. The remainder of the Project Site will remain open for access and will continue to function as a retail center during construction. Therefore, pedestrian access to remaining land uses on the Project Site will not be significantly affected because those uses would continue to operate during construction. The Project design would also be reviewed by the Los Angeles Department of Building and Safety (LADBS) and the LAFD during the City's plan review process to ensure all applicable requirements are met. Also, the Proposed Project would replace the existing surface parking lot within the Development Site with a new mixed-use building and pedestrian-friendly design. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

(h) Transit Oriented Communities Guidelines

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22 A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program (TOC Program). The Measure requires the Department of City Planning to create TOC Affordable Housing Incentive Program Guidelines (TOC Guidelines) for all housing

developments located within a one-half mile radius of a Major Transit Stop. The TOC Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program consistent with LAMC Section 12.22 A.31. The Proposed Project is located in a Tier 3 TOC area.[18] The Proposed Project does not include any development incentives authorized under LAMC Section 12.22.A.31. As such, the TOC Guidelines are not applicable to the Proposed Project.

(i) Vision Zero Los Angeles (2015-2025)

In August 2015, Los Angeles Mayor Eric Garcetti launched the Vision Zero Initiative by issuing Executive Directive Number 10.[19] The directive prioritizes human life in the design of City streets and identifies strategies for how government and the public can partner to reduce traffic deaths to zero. The directive tasks various City departments such as LADOT, Bureau of Engineering, Bureau of Street Lighting, Bureau of Street Services, and the Police Department to review traffic collision data within the High Injury Network and develop programs and initiatives to minimize vehicle-pedestrian conflicts and improve pedestrian safety. One of the stated objectives of the Mayor's Vision Zero Executive Order is to decrease the transportation related fatality rate to zero by 2025. As discussed above, in the vicinity of the Development Site, W. 3rd Street is identified in the Vision Zero Action Plan's High Injury Network. The Proposed Project would increase the current five foot sidewalk width on W. 3rd Street to 15 feet, which is consistent with the sidewalk design dimensions as specified in the Mobility Plan 2035. As such, the Proposed Project would not conflict with the City's Vision Zero goals to improve pedestrian safety within the High Injury Network.

(j) Manual of Policies and Procedures - Section 321: Driveway Design

Section 320 of LADOT's Manual of Policies and Procedures (MPP) provides the basic criteria for review of driveway designs. Subsection V(A) of Section 321 specifies that driveways should not be permitted along an arterial frontage where the Proposed Project is residential and access is possible using an alley or non-arterial street. All new driveways serving the Project Site are located on S. Ogden Drive, which designated as a local street. Thus, the Proposed Project would not conflict with this standard as no new driveways are proposed along an arterial street.

Subsection V(B) of Section 321 specifies that driveways on collector or local streets serving lots with frontages greater than 250 feet should not be placed within 75 feet of

[18] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed April 2020.*

[19] *City of Los Angeles, Office of the Mayor, Mayor Garcetti, Executive Directive 10, Vision Zero August 24, 2015.*

the adjacent street. The northerly driveway on S. Ogden Drive is located 76' 7" from W.3rd Street. As such, the Proposed Project would not conflict with this policy.

Section 321, Subsection V(D) specifies that wherever possible, two-way driveways should be separated by a minimum of 50 feet of full height curb to minimize conflict between vehicles using the adjoining driveways. The Proposed Project includes two new two-way driveways to access the parking garage on S. Ogden Drive. Additionally, the existing southerly driveway on S. Ogden Drive would remain in place and would connect to the parking structure. The northerly two-way garage entry driveway would be 73' – 6" away from the new southerly two-way driveway. The distance between the new southerly driveway and the existing exit service driveway is 72' – 11". As such, the Proposed Project would be consistent with this standard.

Section 321, Subsection VI(B) states that the recommended width of two-way driveways for commercial and multi-family residential uses is 30 feet. The recommendations also state that wider driveways may be appropriate to accommodate large commercial vehicles or multiple entry lanes and shorter driveway widths may be considered where it may be more appropriate to use narrower driveway or field conditions preclude use of recommended widths. The Proposed Project's two new two-way driveways are 30 feet and 36 feet in width, respectively. The additional width for the 36-foot wide driveway is necessary to accommodate an additional queuing lane to ensure traffic does not back up onto S. Ogden Drive. As such, the Proposed Project would not conflict with the driveway width standards.

Section 321, Subsection VI(D) specifies that one-way driveways should be permitted only if one-way-only usage is assured by: (1) angled parking stalls, or (2) other positive control (e.g. tire spikes or mechanical gate). The only one-way driveway is the existing southerly service driveway. The service driveway, which is currently two-way, will be converted to a one-way egress driveway to provide egress access from the proposed parking structure and the service driveway. Consistent with the design recommendations under Subsection VI(D) this driveway will have gated access control from the parking structure to control the direction of traffic. Appropriate signage would also be installed to advise motorists that this is a one way egress driveway.

Section 321, Subsection VIII provides recommendations for the design, location, and adequacy of truck loading docks. This section specifies that back-in or back out loading facilities should not be permitted along arterial highways. The Proposed Project does not include any loading facilities on W. 3rd Street, an arterial street. Two new loading areas are proposed along S. Ogden Drive, which is designated as a Local Street in the Mobility Plan. As such, the Proposed Project would not conflict with this design policy.

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

The Proposed Project would also not conflict with the Plan for a Healthy Los Angeles, Wilshire Community Plan, LAMC Section 12.26J (TDM Ordinance), or the Mobility Hub Reader's Guide. Specifically, the Proposed Project would support the Plan for a Healthy Los Angeles by locating housing near transit, as well as enhancing the pedestrian environment by providing ground floor retail land uses and a 15 foot wide sidewalk on W. 3rd Street and providing on-site bicycle parking within the parking garage. As discussed in detail in Section IV.E, Land Use, of and Appendix M, Land Use Consistency Tables, to this Draft EIR, the Proposed Project would not conflict with Wilshire Community Plan policies related to encouraging pedestrian activity and reducing VMT. In addition, the Proposed Project would include a TDM Program consistent with LAMC Section 12.26.J, as well as elements such as bicycle parking and electric vehicle infrastructure. Therefore, the Proposed Project would not conflict with these programs, plans, ordinances and policies.

Based on the analysis presented above, the Proposed 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

The Proposed Project's impacts upon plans, policies and programs would be less than significant and no mitigation measures are required.

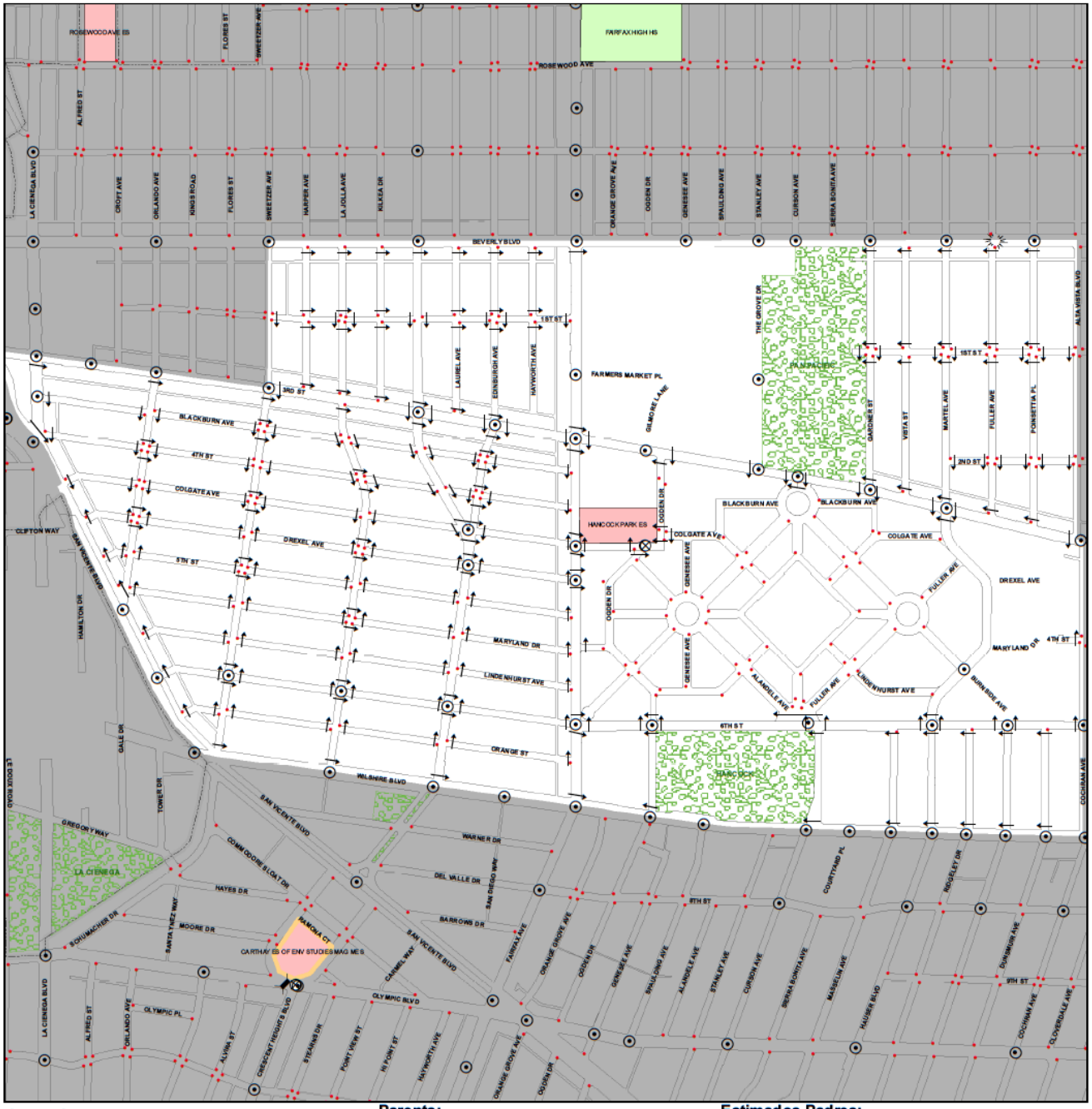
(3) Level of Significance After Mitigation

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

CITY OF LOS ANGELES - DEPARTMENT OF TRANSPORTATION

PEDESTRIAN ROUTES FOR HANCOCK PARK ELEMENTARY SCHOOL

September 2016



Legend

- Recommended Crossing
- Stop Sign
- Traffic Signal
- Crossing Guard
- Flashing Warning Light
- Stairs or Walkway
- Pedestrian Bridge
- Pedestrian Tunnel
- Parks

N
W E
S

0 400 800
Feet

Parents:

This map shows the recommended crossings to be used from each block in your school attendance area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take. Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Obey marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may be necessary. Instruct your child to always look both ways before crossing the street. If no sidewalk exists, your child should walk facing traffic.

Estimados Padres:

Este mapa muestra los cruzados recomendados para los peatones de cada cuadra en la area de su escuela. Siguiendo las flechas en el mapa, selecione la ruta mas segura de su casa a la Escuela y marquelo con un lapis o tiza de color. Esta es la ruta que su hijo (a) debe de usar. Digale a su hijo (a) que use esta ruta y que cruce las calles solamente en los lugares indicados. Usted y su hijo (a) deberian de familiarizarce con esta ruta. Obedezcan los rotulos de peatones, de altos, semaforos y todos los señales de trafico. Puntos para cruzar estan localizados en areas controladas, aunque sea necesario de alargar el tiempo para cruzar. Instruye a su hijo (a) que siempre se fije de los dos lados antes de cruzar la calle. El estudiante debe de siempre caminar en la direccion opuesta del trafico si no existe una banqueta.

Source: LADOT, September 2016.

Figure IV.I-2
Pedestrian Routes for Hancock Park Elementary

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

As discussed in Section 2.2.3, Impact Criteria, of the TAG, a development project would have a significant transportation impact if it meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the APC in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

(1) Impact Analysis

The Proposed Project includes the construction and operation of a mixed-use development consisting of 331 residential apartment units, 13,412 square feet of commercial retail floor area, 63,082 square feet of supermarket floor area, and 7,500 square feet of high-turnover sit-down restaurant floor area. Vehicle and bicycle parking would be provided on-site to satisfy the minimum parking requirements as specified in the LAMC. The Proposed Project would provide a maximum of 977 vehicle parking spaces. As a project feature, the Proposed Project will provide the required number of short-term and long-term bicycle parking spaces for the residential and commercial components as required by the LAMC. The Proposed Project would provide 15 short-term and 158 long-term bicycle parking spaces for the residential component and 42 short-term spaces and 42 long-term spaces for the commercial component.

(a) Screening analysis

As discussed above, a screening analysis was conducted for the purpose of determining whether a VMT analysis is required. In accordance with the screening procedures identified in the TAG, a VMT calculation was prepared for the Proposed Project using Version 1.2 of the LADOT VMT Calculator. The results are summarized in Table IV.I-3, below.

Table IV.I-3
VMT Methodology Trip Generation Project Screening

	Land Use	Scale	Daily Trips	Daily VMT
Proposed	Multi-Family	331 DU	6,571	43,914
	General Retail	13,412 sf		
	Supermarket	63,082 sf		
	High-Turnover Sit-Down Restaurant	7,500 sf		
Existing	General Retail	144,963 sf	4,696	32,405
	High-Turnover Sit-Down Restaurant	6,085 sf		
Net Difference [Proposed – Existing]			**1,875**	**11,509**
Analysis Required [net Difference in Daily Trips> 250]			**YES**	

Notes:
DU = Dwelling Units
sf= square feet
Source: Supplemental Traffic Analysis - VMT Analysis, prepared by LLG Engineers, dated November 20, 2020 (See Appendix H.1(B) to this EIR)

The LADOT VMT Calculator measures Household VMT per Capita, and Work VMT per Employee. LADOT has identified thresholds for significant VMT impacts by sub-area of the City. For this area of the City (the Central Area Planning Commission area) the following thresholds have been identified:

Household VMT per Capita: 6.0
Work VMT per Employee: 7.6

(b) VMT Analysis

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

- Total Population: 746
- Total Employees: 309
- Area Planning Commission: Central
- Travel Behavior Zone: Urban
- Maximum VMT Reduction: 40 percent

Detailed output from the VMT Calculator is provided in Appendix H.1(B) to this Draft EIR. As shown therein and summarized in Table IV.I-4, below, the VMT Calculator estimates that the Proposed Project would generate 6,571 daily vehicle trips and with a daily VMT of 43,914.

Table IV.I-4
VMT Project Impact Analysis

Scenario	Daily Vehicle Trips	Daily VMT	VMT Threshold	Project VMT Per Capita/Employee	Impact
Household	6,571	43,914	6.0	7.1	Yes
Work			7.6	N/A	No
Source: Supplemental Traffic Analysis - VMT Analysis, prepared by LLG Engineers, dated November 20, 2019 (See Appendix H.1(B) to this EIR)					

As noted in Table IV.I-4, above, the Proposed Project's daily vehicle trips and daily VMT result in a Household VMT per Capita of 7.1 miles. Pursuant to the TAG, the Household VMT per Capita threshold for the Central APC is 6.0 miles or less. Accordingly, the Proposed Project would exceed the applicable Household VMT per Capita without mitigation.

The Proposed Project would not generate a significant Work VMT because its work-related trips are generated by local-serving retail trips. The Development Site is part of local-serving retail center, and the Proposed Project includes a mix of residential and local-serving retail land uses. The TAG provides that local-serving retail developments tend to shorten trips and reduce VMT compared to regional-serving retail development and single-land-use type of developments.[20] As such, the VMT Calculator, when applied to this Project demonstrates that Work VMT would be less than significant without mitigation.

In summary, considering the above, the Proposed Project would have a significant impact prior to mitigation with respect to Household VMT per Capita; and would have a less than significant impact with respect to Work VMT without the need for

[20] *As indicated in the TAG, retail projects that fall under 50,000 square feet are considered local-serving. The retail and restaurant components of the project are considered local-serving because their total floor area is less than 50,000 square feet. Per LADOT, when a supermarket is part of a mixed-use project, it is not reflected in the VMT Calculator so as to reflect the synergy of trip-making between the supermarket and residential components. This internal trip-making yields the less than significant VMT impact. See e-mail correspondence from Eddie Guerrero, Senior Transportation Engineer, LADOT, to Jason Shender, Transportation Planner II, Linscott Law and Greenspan Engineers, dated February 11, 2020 (included in Appendix H.1(C).*

mitigation. The mitigation measures for the Household VMT per Capita are discussed below.

(2) Mitigation Measures

The following mitigation measure shall be implemented as part of the Proposed Project's vehicle trip-reduction strategies.

MM-TRAFFIC-1 The Proposed Project shall incorporate the following Transportation Demand Management (TDM) Strategies as part of the ongoing Project operations:

- **Unbundle Parking.** The Proposed Project shall unbundle the parking costs from the property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. This strategy is applicable for residential components of development projects.
- **Promotions and Marketing.** The Proposed Project shall utilize marketing and promotional tools to educate and inform residents and employees about alternative transportation options and the effects of their travel choices. This strategy includes providing passive educational and promotional materials, such as posters, information boards, or a website with information that residents and employees can choose to read at their own leisure.
- **Bike Parking.** The Proposed Project shall provide the required number of short-term and long-term bicycle parking spaces for the residential and commercial components pursuant to LAMC. The Project should provide a maximum commitment to implementing/improving on-street bicycle facilities, providing bicycle parking per the LAMC, and providing secure ancillary bike facilities such as indoor bicycle parking/lockers, showers and repair stations.

(3) Level of Impact After Mitigation

Using LADOT's VMT Calculator, the Proposed Project's VMTs were calculated with the TDM strategies identified in MM-TRAFFIC-1 applied. As shown in Table IV.I-5, below, the Proposed Project Household VMT per Capita would be 5.8 with mitigation applied. MM-TRAFFIC-1 reduces the Household VMT per Capita from 7.1 (unmitigated) to 5.8 (mitigated). As noted above, the TDM strategies included in MM-TRAFFIC-1 include unbundled parking, promotions and marketing, and bike parking per the LAMC, which are consistent with the type of measures allowed by LADOT to reduce VMT.

Table IV.I-5
VMT Project Impact Analysis With Mitigation

Scenario	Daily Vehicle Trips	Daily VMT	VMT Threshold	Project VMT Per Capita/Employee	Impact
Household	6,143	41,197	6.0	5.8	No
Work			7.6	N/A	No
Source: Supplemental Traffic Analysis - VMT Analysis, prepared by LLG Engineers, dated November 20, 2020 (See Appendix H.1(B) to this EIR)					

More specifically, the unbundled parking component unbundles the parking costs from the property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. This strategy is applicable for residential components of development projects. The Project is taking a 14 percent VMT reduction for providing unbundled parking. By comparison, the maximum available VMT reduction allowed in the VMT Calculator for providing unbundled parking is 26 percent of residential-based VMT. Thus, the analysis here has assumed a realistic and conservative VMT reduction associated with unbundled parking.

For marketing and promotions, the Project will utilize promotional tools to educate and inform residents and employees about alternative transportation options and the effects of their travel choices. The Project is taking a 4 percent VMT reduction from the use of promotions and marketing to encourage alternative transportation options, which is consistent with the maximum reduction permitted by the VMT Calculator approved by LADOT.

Furthermore, the Project would provide 15 short-term and 158 long-term bicycle parking spaces for the residential component. For the commercial component, the Project is projected to provide 42 short-term spaces and 42 long-term spaces. As a project feature, the Project will provide the required number of short-term and long-term bicycle parking spaces for the residential and commercial components. The Project is taking a 0.625% VMT reduction for providing bike parking per the LAMC, which is consistent with the maximum reduction permitted by the VMT Calculator approved by LADOT. Therefore, with the implementation of the TDM strategies in MM-TRAFFIC-1, the Proposed Project will have a less than significant VMT impact. ***Thus, the Proposed Project would not conflict with 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); or

(1) Impact Analysis

(a) Construction

With respect to potential hazards due to temporary construction impacts, the Proposed Project would result in the export of approximately 13,986 cubic yards (cy) of demolition debris and 110,000 cy of soil from the Project Site. During these phases, hauling of material from the Project Site would occur on weekdays between 9:00 AM and 3:00 PM. The demolition and site clearing phase is estimated to generate 46 haul trips per day over approximately 44 days. The grading and earthwork phase is estimated to generate 212 haul trips per day over an approximate 65 day period.

The precise route of haul trucks arriving to and departing from the Project Site will be determined in consultation with LADOT. It is reasonable to assume, however, that the primary route to be used by haul trucks traveling to and from the Project Site will include accessing the I-10 (Santa Monica) Freeway and US-101 Hollywood Freeway via W. 3rd Street and S. La Brea Avenue, as shown in Figures II-20 and Figure II-21 in Section II, Project Description.

The construction of the Proposed Project would not require the permanent closure of vehicle travel lanes. This is due primarily to the availability of parking "lanes" adjacent to the Project Site on S. Ogden Drive, so that the use of the adjacent travel lanes would not be permanently impacted. The street parking spaces adjacent to the Project Site on S. Ogden Drive may be reserved for use by construction vehicles during construction. The temporary unavailability of these street parking spaces is not expected to cause a material adverse effect related to continuing access to the Project Site or surrounding uses. There are alternative routes (vehicular and pedestrian) around the Project Site which will remain unaffected by construction activities.

Temporary partial closures of S. Ogden Drive may occur periodically for certain activities during the building construction phase. These activities include, but are not limited to bringing in concrete pumps to pour the mat foundation slab and transporting the cranes needed to erect and dismantle the tower crane used for construction of the Proposed Project. Construction activities would also temporarily affect the sidewalk along the frontage of the Development Site, which could block existing pedestrian and bicycle access to the Development Site. Construction activities would not modify access to transit stations, stops or facilities because there are no such facilities located along the frontage of the Development Site.

As stated above, PDF-TRAFFIC-1 would require the Project Applicant to prepare and submit a work site traffic control plan to LADOT for review and approval prior to the start of construction. That plan would show the location of any temporary roadway, street parking, or sidewalk closures, warning signs and access to abutting properties. The

sidewalk along S. Ogden Drive from W. 3rd Street to the Proposed Project Site's southern property line would be closed on a temporary basis for the duration of the Proposed Project's construction process. However, signs would be posted advising pedestrians of temporary sidewalk closures and providing alternative routes (e.g., a sign or signs would direct pedestrians to use the sidewalk on the east side of S. Ogden Drive as an alternative route). Further, as noted in PDF-TRAFFIC-2 and PDF-TRAFFIC-3, above, the Applicant will coordinate with and maintain communication with the LAUSD as appropriate during the entirety of the construction process and incorporate safety oriented best management practices to ensure pedestrian safety. Figure IV.I-2, Hancock Park Elementary School Pedestrian Routes, identifies the available pedestrian routes for students of the adjacent elementary school to ensure safety of these students. As noted in PDF-TRAFFIC-2, the prohibition of utilizing Colgate Avenue to access or leave the Project Site would avoid conflict with the pedestrian access routes to the school. Also, the sidewalk on the east side of S. Ogden Drive would be available to access a designated crossing guard location directly in front of the school.

Therefore, with adherence to PDFs noted above, and due to the short-term nature of any potential street and sidewalk closures, and the fact that any such closures would be subject to the review and approval of LADOT and the Department of Building and Safety, and detours to school pedestrian routes would be communicated to the LAUSD in advance, the potential for increased hazards impacts as a result of temporary construction activities would be less than significant.

(b) Operation

The Proposed Project does not propose any roadway infrastructure improvements that would result in sharp curves or dangerous intersections. The Proposed Project would retain the existing visitor access driveway on S. Fairfax Avenue and the existing westerly driveway on W. 3rd Street. The southerly driveway that connects S. Fairfax Avenue to S. Ogden Drive would also be retained. The existing easterly driveway on W. 3rd Street would be eliminated to activate the pedestrian ground floor level fronting the commercial uses on W. 3rd Street. On S. Ogden Drive, the Proposed Project would provide one service driveway to access the retail spaces, and would provide two new ingress/egress driveways to access the residential and commercial driveways into the parking structure, respectively. As noted above, under subheading (n) Manual of Policies and Procedures - Section 321: Driveway Design, the proposed driveway locations and widths are consistent with the City's design regulations.

In accordance with the LADOTs Interim Guidance for Freeway Safety Analysis[21], freeway off-ramps should be studied if a project will add 25 or more trips to an off-ramp during either the AM or PM peak hour. As shown in Exhibit A-1 from the Project Traffic Study (provided in Appendix H.2(A) to this Draft EIR), no more than five trips will be added to any off-ramps in the project vicinity. As, such, the Proposed Project would have a less than significant impact on nearby freeway on-ramps and no further analysis is required.

Furthermore, the Proposed Project's design would be reviewed by the Los Angeles Department of Building and Safety and the Los Angeles Fire Department (LAFD) during the City's plan review process to ensure all applicable safety requirements are met. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Proposed Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site.

No incompatible uses or operations are proposed that would cause or result in incompatible equipment being used on site or on local roadways. ***As such, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant.***

(2) Mitigation Measures

No mitigation measures are required.

(3) Level of Impact After Mitigation

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

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

(1) Impact Analysis

Construction on the Development Site may require temporary and/or partial street closures on W. 3rd Street and S. Ogden Drive due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. The temporary closures would not be expected to substantially interfere with emergency response or evacuation plans.

[21] *City of Los Angeles Department of Transportation, Correspondence to Transportation Engineering and Planning Consultant Firms Re: LADOT Transportation Assessments - Interim Guidance for Freeway Safety Analysis, May 1, 2020.*

To ensure limited interruptions due to construction activities, the Proposed Project includes PDF-TRAFFIC-1 to ensure adequate circulation and emergency access by implementing a Construction Traffic Control/Management Plan (CTM Plan) that will be approved by LADOT. The CTM Plan would minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Proposed Project. While it is expected that the majority of construction activities for the Proposed Project would primarily be confined onsite, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the LADOT-approved CTM Plan. Therefore, the Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. ***The Proposed Project would cause a less than significant impact to emergency access during the Project's construction phase.***

The operation of the Proposed Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the proposed vehicular design or site plan for the Proposed Project that could impede emergency access. The Proposed Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from S. Fairfax Avenue, W. 3rd Street and S. Ogden Drive. Furthermore, the Proposed Project would be subject to the plan review requirements of the LAFD pursuant to Section 118 of the Fire Code to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. As discussed above, all Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Proposed Project. ***Therefore, the Proposed Project would not result in inadequate emergency access, and impacts would be less than significant during operation.***

(2) Mitigation Measures

No mitigation measures are required.

(3) Level of Impact After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

With regard to threshold a), relevant plans, ordinances and policies that are applicable to the Proposed Project, as addressed in Table IV.I-2 above, were reviewed in conjunction with the related projects identified in Section III, Environmental Setting (See Table III-2, Related Projects List) to assess the potential for cumulative impacts that may result from the Proposed Project in combination with other development projects in the Project vicinity. Similar to the Proposed Project, all of the related projects within the City would be subject to the City's standard development review process and would be reviewed in accordance with the TAG to ensure consistency with applicable traffic, transit and pedestrian safety-related policies. If any of the related projects result in a significant VMT impact, they would be required to mitigate such impacts through a TDM program to reduce vehicle trips. As also discussed above, the Proposed Project would result in a less than significant impact with respect to VMT. If there was a cumulative impact as a result of the related projects having significant and unavoidable VMT impacts, the Proposed Project's contribution would not be cumulative considerable.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, Project impacts would be less than significant. Similar to the Proposed Project, the related projects would be required to provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21 A.16(a). Furthermore, related project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. Therefore, the Proposed Project and related projects would not result in a significant cumulative impact with respect to pedestrian and bicycle facilities.

None of the related projects identified in Section III, Environmental Setting, would cumulatively impact or impede the City from implementing any adopted policy and/or program related to the City's circulation system, including transit, roadway, bicycle and pedestrian facilities. As such, cumulative impacts upon adopted policy and/or programs would be less than significant.

With regard to threshold b), cumulative VMT impacts are determined through a consistency check with SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas emissions reduction targets. As such, projects that are consistent with the 2016-2040 RTP/SCS in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. As discussed in further detail in Section IV.E Land Use, the Proposed Project is consistent with the regional growth projections of the 2016-2040 RTP/SCS. Additionally, the Proposed Project is a compact infill development, which is the type of project encouraged by the 2016-2040 RTP/SCS and transportation planning in accordance with Senate Bill (SB) 375. Furthermore, as described above, the Proposed Project would result in an average household VMT per capita of 5.8 and is not expected to generate work VMT, which is below the thresholds for the Central APC (6.0 and 7.6, respectively). Thus, since the Proposed Project is consistent with the 2016-2040 RTP/SCS, cumulative VMT impacts would be less than significant, and the Project's contribution to cumulative impacts would not be cumulatively considerable.

With regard to threshold c) the Proposed Project does not propose any roadway infrastructure improvements that would result in sharp curves or dangerous intersections. No incompatible uses or operations are proposed that would cause or result in incompatible equipment being used on site or on local roadways. The roadways in the surrounding area are part of the existing urban roadway network and do not contain sharp curves or dangerous intersections. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by LAFD. The design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. As such, the Proposed Project would not have the potential to result in or contribute to cumulative impacts associated with hazards due to geometric design features or incompatible uses.

With regard to threshold d) the Proposed Project would result in a less than significant impact associated with emergency access. Like the Proposed Project, the related projects would be anticipated to provide for safe and efficient circulation including adequate sight distances, implement multi-modal transportation strategies to facilitate the dispersal of traffic, and alleviate project-specific traffic access impacts, as appropriate. In addition, as previously discussed, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s). Furthermore, since

modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected.

(2) Mitigation Measures

No mitigation measures are required.

(3) Level of Impact After Mitigation

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