

IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is primarily based on the *Wilshire and Cloverdale Project Transportation Assessment* (Transportation Assessment)¹ prepared by Fehr & Peers, and included in its entirety in Appendix J of this Draft EIR. The analysis of vehicle miles traveled (VMT) is based on the Transportation Assessment, which was prepared pursuant to LADOT's Transportation Assessment Guidelines (TAG). The TAG was developed in July 2019 and updated in July 2020 and August 2022 to establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was also prepared pursuant to a Memorandum of Understanding (MOU) reviewed and approved by LADOT in August 2021 and included as Appendix A of the Transportation Assessment. The Transportation Assessment was approved by LADOT on September 13, 2024. Following LADOT approval, additional minor revisions to the Transportation Assessment to address comments from the Department of City Planning were required in November 2024. On January 14, 2025, LADOT confirmed to Fehr & Peers via email that a new approval letter would not be required because the revisions would not affect their September 13, 2024, assessment. A copy of LADOT's Assessment Letter and confirmation email for the Transportation Assessment are included in Appendix J of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, State, regional, and City of Los Angeles levels that apply to the Project. As described below, these plans, guidelines, and laws include:

¹ Fehrs & Peers, *Wilshire and Cloverdale Project Transportation Assessment*, November 2024.

- Federal Americans with Disabilities Act of 1990
- California Complete Streets Act
- California Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- California Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
 - Mobility Element: City of Los Angeles Mobility Plan 2035
 - Land Use Element:
 - Wilshire Community Plan
 - Miracle Mile Community Design Overlay
 - Health Element: Plan for A Healthy Los Angeles
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- LADOT Guidance for Freeway Safety
- City of Los Angeles Citywide Design Guidelines

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design),

establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

(a) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

(b) Assembly Bill 32 and Senate Bill 375

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

On December 11, 2008, CARB adopted its first Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the State comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for certain preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they: (1) are at least 50 percent residential; (2) meet specified density requirements; and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

(c) California Vehicle Code

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

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR)² to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics to traffic LOS. This started a process that changed transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of

² The Governor's Office of Planning and Research was renamed to the Office of Land Use and Climate Innovation (LUCI) in July 2024.

vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”

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

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City’s formal method of evaluating a project’s CEQA transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project’s transportation impacts under CEQA in accordance with SB 743, in July 2019 with updates in July 2020 and August 2022.

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop³

³ “Major transit stop” is defined in Public Resources Code (PRC) Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. AB 2553 was approved on September 19, 2024, to amend PRC Section 21064.3 and revise the definition of “major transit stop” to increase the frequency of service interval (Footnote continued on next page)

or a stop along an existing high-quality transit corridor⁴ should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household, or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the current version of the TAG.

(3) Regional

(a) Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

In compliance with SB 375, on April 4, 2024, the Southern California Association of Governments (SCAG) Regional Council adopted the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS), also referred to as Connect SoCal 2024, a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2024–2050 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2024–2050 RTP/SCS builds on the long-range vision of SCAG’s prior 2020–2045 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Development Areas (PDAs), which include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors, and Spheres of Influence (SOIs). These areas account for 8.2 percent of SCAG’s total land area, 66 percent of forecasted household growth, and 54 percent of forecasted employment growth between 2019 and 2050. TPAs

to 20 minutes. Previously the definition included a frequency of 15 minutes or less during peak commute periods.

⁴ “High-quality transit corridors” are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

are PDAs that are within 0.5 miles of a major transit stop that is existing or planned. NMAs include four elements: intersection density; low-speed streets; land use diversity; and accessibility to amenities within one mile using street network distances. Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. Growth at strategic nodes along key corridors, many of which are within High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. SOIs are existing or planned service areas within the planning boundary outside of an agency's legal boundary. The intent of a SOI is to promote the efficient, effective, and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies.

The goals of the 2024–2050 RTP/SCS fall into four core categories: mobility, communities, environment, and economy. The 2024–2050 RTP/SCS invests \$751.7 billion in the transportation system, primarily in operations and maintenance, to ensure the continued performance of the current network. The 2024–2050 RTP/SCS includes investments and strategies to better manage these and past investments, including an Intelligent Transportation System and policies for Transportation Demand Management. With implementation of the objectives, the 2024–2050 RTP/SCS intends to create a region with:

- Transit as a backbone of the transportation system;
- More Complete Streets where people and safety are prioritized;
- Policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals;
- More housing, jobs, and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces;
- More housing to address the “existing housing need” as defined by the Regional Housing Needs Assessment; and
- Safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies.

Specific to the core category of mobility, the 2024–2050 RTP/SCS includes the following categories of mobility policies and strategies:

- System Preservation and Resilience;
- Complete Streets;

- Transit and Multimodal Integration;
- Transportation System Management;
- Transportation Demand Management;
- Technology Integration;
- Safety; and
- Funding the System/User Fees.

When compared with the 2019 baseline condition, upon full implementation of the 2024–2050 RTP/SCS in 2050, the 2024–2050 RTP/SCS would result in a 11.6-percent reduction in daily VMT per capita, a 31.8-percent reduction in daily minutes of traffic delay, and a 7.9-percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles General Plan

(i) Mobility Element (Mobility Plan 2035)

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City’s General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.⁵ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities:

- (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.

⁵ Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

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

Street classifications are designated in the Mobility Plan, may be amended by a Community Plan, and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
 - Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- Collector Streets: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.
 - Continuous local streets connect to other streets at both ends.
 - Non-Continuous local streets lead to a dead-end.

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- A BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035;

- A TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders;
- A VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times;
- A NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel; and
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(ii) Land Use Element (Wilshire Community Plan)

The Land Use Element of the City's General Plan includes 34 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework Element (Framework Element) at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Wilshire Community Plan (Community Plan) area. The Community Plan includes the following transportation and circulation goals, objectives, and policies that are applicable to the Project:

Goal 11: Encourage a system of safe, efficient and attractive bicycle and pedestrian facilities.

Policy 11-1.4: Support the provision of bicycle facilities in all new development.

Objective 11-2: Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.

Policy 11-2.3: Protect and improve existing pedestrian oriented street segments.

Goal 12: Encourage alternative modes of transportation to reduce single-occupancy vehicular trips.

Objective 15-1: Provide off-street parking in appropriate locations in accordance with Citywide standards and community needs.

Policy 15-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.

(iii) Land Use Element—Miracle Mile Community Design Overlay

Miracle Mile Community Design Overlay (CDO) establishes goals, guidelines, and standards for site planning to enhance pedestrian orientation and circulation. The CDO includes the following relevant goal, guidelines, and standards:

Goal 2: To encourage development that preserves and enhances the physical appearance of the corridor and contributes to the District's unique historical context.

Guideline 1: Orient buildings towards Wilshire Boulevard and adjacent cross-streets in order to encourage pedestrian-activity along sidewalks of the Miracle Mile and facilitate pedestrian access to and from the sidewalk to adjacent properties.

Standard 1: Project with rear lot lines abutting a street, alley, or parking lot should incorporate pedestrian entrances at the rear lot line in addition to those on Wilshire Boulevard.

Guideline 2: Provide easy sidewalk access to pedestrians by locating vehicle access and loading areas where there will be minimal physical or visual impact on pedestrians, the flow of traffic, and/or related uses.

Standard 2a: All vehicular entrances should be located off of a side street or an alley in order to minimize pedestrian and vehicular conflicts.

Standard 2b: Walkways for pedestrian access should be provided between parking areas and the Project.

(iv) Health Element (Plan for a Healthy Los Angeles)

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

by the land use pattern and transportation opportunities. The Plan for a Healthy Los Angeles includes the following mobility policies that are applicable to the Project:

- Policy 2.2: Healthy Building Design and Construction. Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.
- Policy 2.4: Aging in Place. Mobilize and support a life-long process of active aging by making Los Angeles an “age-friendly” city that strives to create a positive, socially inclusive, and supportive environment, that encourages barrier-free buildings and streets, enhanced mobility and independence of people with disabilities, safe neighborhoods, and opportunities for volunteer and paid work.
- Policy 2.11: Foundation for Health. Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.
- Policy 5.7: Land Use Planning for Public Health and GHG Emission Reduction. Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

(b) Los Angeles Municipal Code

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

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

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

LAMC Section 12.26 J provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures, such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

(c) LADOT Transportation Assessment Guidelines

As discussed above, pursuant to CEQA Guidelines Section 15064.3 that implements SB 743, the City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG has been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.⁶

(d) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the basic criteria for the review of driveway design. As discussed in MPP Section 321, the basic

⁶ LADOT, *Transportation Assessment Guidelines*, August 2022.

principle of driveway location planning is to minimize potential conflicts between users of the parking facility and users of the abutting street system, including the safety of pedestrians.

(e) Vision Zero

The Vision Zero program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2018, represents six percent of the City's street miles but accounts for approximately two-thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

(f) LADOT Guidance for Freeway Safety

Section 3.3.4 of the TAG provides Guidance for Freeway Safety Analysis (City Freeway Guidance) that identifies City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

(g) Citywide Design Guidelines

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

b. Existing Conditions

(1) Existing Project Site Conditions

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with four historic commercial buildings and surface parking. The existing buildings range from one to two stories and include 48,229 square feet of commercial uses. The Project Site is bounded by Wilshire Boulevard to the north, residential buildings and surface parking to the south, Detroit Street to the east, and Cloverdale Avenue to the west.

(2) Existing Street Systems

The Project's transportation assessment study area (Study Area) includes a half-mile radius from the Project Site for transit and bike assessments and a quarter-mile radius for pedestrian assessment, which were selected based on guidance in the LADOT TAG and approved by LADOT through the Project MOU process. The existing street system in the Study Area consists of a regional roadway system, including freeways, arterial streets, collector streets, and local streets, which provide regional, sub-regional, and local access and circulation to the Project Site.

(a) Freeways

Primary regional access to the Study Area is provided by the Interstate 10 Freeway (I-10), located 2.4 miles south of the Project Site, and the Hollywood Freeway (US-101), located 3.8 miles north of the Project Site. I-10 runs in the east-west direction and provides four travel lanes in each direction with a speed limit of 65 miles per hour (mph). Access is provided via interchanges at Crenshaw Boulevard, Arlington Avenue, La Brea Avenue, and Fairfax Avenue/Washington Boulevard. US-101 runs in the southeast-northwest direction and provides four travel lanes in each direction with a speed limit of 55 mph. Access is provided via interchanges at Highland Avenue and Cahuenga Boulevard.

(b) Streets

Listed below are the primary streets that provide regional and local access to the Project Site.

- West 6th Street—West 6th Street is a designated Avenue III that travels in the east-west direction. It generally provides four travel lanes with two lanes in each direction within the vicinity of the Project Site. Parking is permitted during off-peak periods on both sides of the street. Left turn pockets are provided along portions of the street. 6th Street is included in the NEN, BEN, and PED in the Mobility Plan. 6th Street is posted for a 35-mph speed limit in the Study Area.
- Wilshire Boulevard—Wilshire Boulevard is a designated Avenue I that travels in the east-west direction. It generally provides four travel lanes with two lanes in each direction. Parking is permitted during off-peak periods on both sides of the street. Wilshire Boulevard is included in the BEN and PED in the Mobility Plan. Wilshire Boulevard is posted for a 35-mph speed limit in the Study Area.
- West 8th Street—8th Street is a designated Collector Street that travels in the east-west direction. It provides two travel lanes with one lane in each direction, and parking is permitted on both sides of the street. Left turn pockets are provided along portions of the street. 8th Street is included as part of the NEN in the Mobility Plan. 8th Street is posted for a 30-mph speed limit in the Study Area.

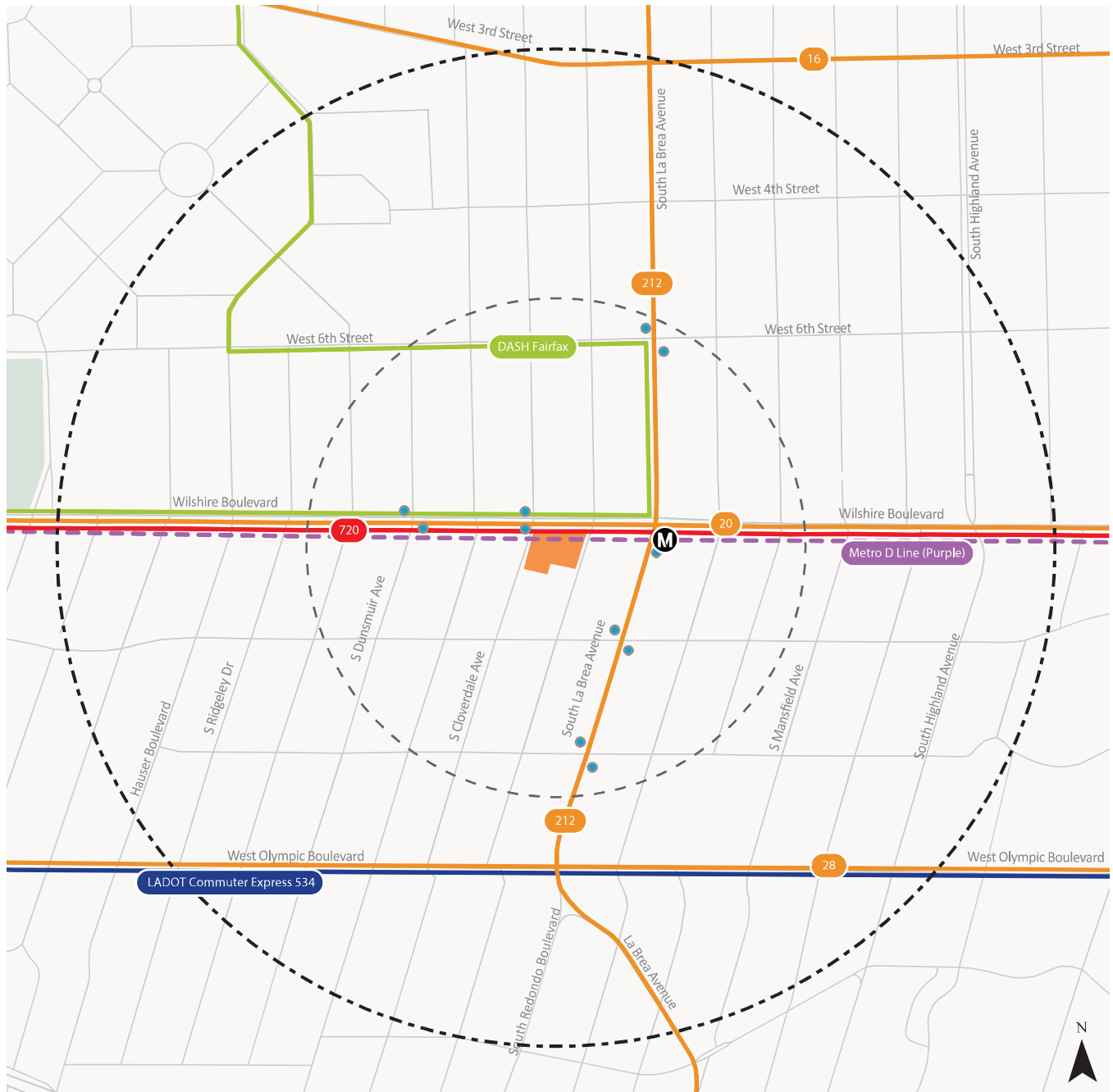
- Olympic Boulevard—Olympic Boulevard is a designated Boulevard II that travels in the east-west direction. Olympic Boulevard provides six travel lanes with three in each direction. Parking is permitted during off-peak periods on both sides of the street. Left turn pockets are provided along portions of the street. Olympic Boulevard is included in the PED and VEN in the Mobility Plan. Olympic Boulevard is posted for a 35-mph speed limit in the Study Area.
- La Brea Avenue—La Brea Avenue is a designated Avenue I that travels in the north-south direction. It generally provides five travel lanes with two to three travel lanes in each direction. Parking is permitted during off-peak periods on both sides of the street. La Brea Avenue is included in the BEN and PED in the Mobility Plan. La Brea Avenue is posted for a 30-mph speed limit in the Study Area.
- Detroit Street—Detroit Street is a designated Local Street that travels in the north-south direction. It generally provides two travel lanes with one travel lane in each direction. Restricted permitted parking is available on both sides of the street. Detroit Street is posted for a 25-mph speed limit in the Study Area.
- Cloverdale Avenue—Cloverdale Avenue is a designated Local Street that travels in the north-south direction. It generally provides two travel lanes with one travel lane in each direction. Restricted permitted parking is available on both sides of the street. Cloverdale Avenue is included as part of the NEN in the Mobility Plan. Cloverdale Avenue is posted for a 25-mph speed limit in the Study Area.
- Hauser Boulevard—Hauser Boulevard is a designated Collector Street that travels in the north-south direction. It generally provides two travel lanes with one travel lane in each direction. Restricted permitted parking is available on both sides of the street. Left turn pockets are provided along portions of the street. Hauser Boulevard contains a Class II Bike Lane north of West 6th Street and is included as part of the BEN and NEN in the Mobility Plan. Hauser Boulevard is posted for a 30-mph speed limit in the Study Area.
- Cochran Avenue—Cochran Avenue is a designated Collector Street that travels in the north-south direction. It generally provides two travel lanes with one lane in each direction. Restricted permitted parking is available on both sides of the street. Cochran Avenue is included as part of the NEN in the Mobility Plan. Cochran Avenue is posted for a 25-mph speed limit in the Study Area.

(3) Existing Public Transit Service

As shown in Figure IV.I-1 on page IV.I-18, the Study Area is served by a variety of public transit options operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the LADOT DASH. The existing transit lines/routes located within a half-mile radius of the Project Site are also shown in Figure 3 of the Transportation Assessment, included in Appendix J of this Draft EIR. The following public transit facilities provide service within the Study Area:

- Metro D Line Wilshire/La Brea Station: Metro D Line Wilshire/La Brea Station is a newly completed metro rail station that provides service to Union Station and Beverly Hills via the existing Metro D Line, with further extensions to Century City and Westwood opening in 2027. The Metro D Line has existing average headways of approximately 12 minutes during the A.M. and P.M. peak hours.
- Metro Line 20: Line 20 is a local line that provides service in Downtown Los Angeles, Westwood, and Santa Monica via Wilshire Boulevard, with average headways of approximately 12 minutes during the A.M. and P.M. peak hours.
- Metro Line 212: Line 212 is a local line that provides service from Hawthorne to Hollywood via La Brea Avenue, with average headways of approximately 12 to 13 minutes during the A.M. and P.M. peak hours.
- Metro Line 720: Line 720 is a local line that provides service from Santa Monica to Downtown Los Angeles via Wilshire Boulevard, with average headways of approximately five to six minutes during the A.M. and P.M. peak hours.
- LADOT DASH Fairfax: The DASH Fairfax shuttle provides service from the Cedars-Sinai Medical Center to the Miracle Mile via Melrose Avenue, Fairfax Avenue, and Wilshire Boulevard. The DASH Fairfax shuttle has an average headway of 30 minutes during the weekday A.M. and P.M. peak periods.

In addition to the lines noted above and in the Transportation Assessment, Antelope Valley Transit Authority (AVTA) Line 786 runs southbound A.M. buses from Palmdale/Lancaster to Century City/West Los Angeles and northbound P.M. buses returning to Palmdale/Lancaster with stops on Wilshire Boulevard.



- | | | |
|---|---|---|
|  1/2-mile Buffer |  Bus Stops within 1/4 mile of the Project Site |  Metro Rapid Bus |
|  1/4-mile Buffer |  Fairfax DASH |  Metro Local Bus |
|  Project Site |  LADOT Commuter Express |  Metro Rail |

Figure IV.I-1
Transit Facilities in the Study Area

(4) Existing Site Access

Vehicular access to the Project Site is provided via two driveways on Cloverdale Avenue and a dead end 20-foot alley that is accessed from Detroit Street and terminates at the middle of the Site.

(5) Existing Pedestrian and Bicycle Facilities

(a) Pedestrian Facilities

As shown in Figure IV.I-2 on page IV.I-20, the Study Area generally includes sidewalks and pedestrian safety features such as tactile warning strips and high-visibility crosswalks. Along the Project Site frontages, 15-foot-wide sidewalks are provided on Wilshire Boulevard, 10-foot-wide sidewalks are provided on Cloverdale Avenue, and 10-foot-wide sidewalks are provided on Detroit Street. Nearly all the signalized intersections in the Project vicinity provide crosswalk striping, pedestrian signals, pedestrian push buttons, and ADA accessibility improvements.

(b) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the City's existing bicycle system consists of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes (Class II) are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic to ensure safety. These facilities offer a safer environment for both cyclists and motorists. Bicycle routes (Class III) and bicycle-friendly streets are those where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes and bicycle-friendly streets are preferably located on collector and lower volume arterial streets. Bicycle routes with shared lane markings, or "sharrows," remind bicyclists to ride farther from parked cars to prevent collisions, make motorists aware of bicycles potentially in the travel lane, and show bicyclists the correct direction of travel.

As shown in Figure IV.I-3 on page IV.I-21, as well as Figure 5 of the Transportation Assessment, the Study Area includes the existing Class II Bike Lane along Hauser Boulevard north of West 6th Street; a Class III Bike Route with sharrows on South Redondo Boulevard south of Olympic Boulevard; and a Class III Bike Route with sharrows on West 4th Street east of Cochrane Avenue.

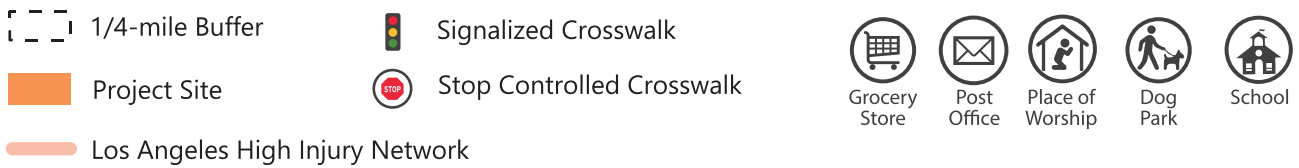
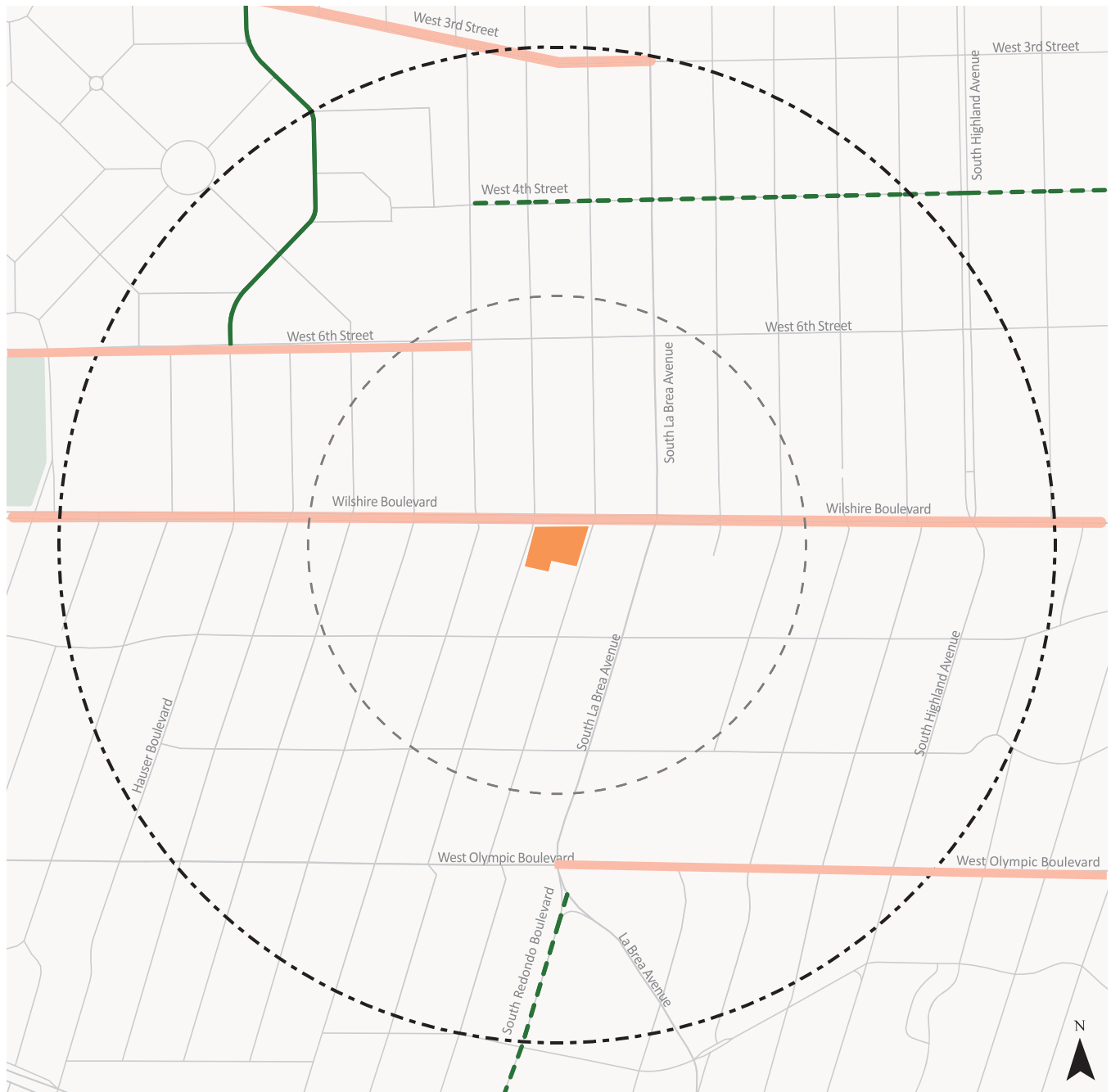


Figure IV.I-2
Pedestrian Facilities in the Study Area



- | | | |
|---|---|--|
|  Project Site |  1/2-mile Buffer |  Bike Lane |
|  LADOT High-Injury Network (HIN) |  1/4-mile Buffer |  Bike Route with Sharrows |

Figure IV.I-3
Bicycle Facilities in the Study Area

(6) Existing High Injury Network Facilities

Vision Zero is a traffic safety policy that promotes strategies to eliminate transportation-related collisions that result in severe injury or death. As indicated previously, Vision Zero has identified the HIN, a network of streets that have been identified to receive strategic investments by LADOT based on collision data from the last five years to reduce death and severe injury. As shown in Figure IV.I-2 and Figure IV.I-3 on pages IV.I-20 and IV.I-21, the following streets located adjacent to the Project Site have been identified in the LADOT HIN: West 6th Street and Wilshire Boulevard. Furthermore, within the Study Area, West 3rd Street is also identified in the LADOT HIN.

In order to realize the goals and objectives of the Vision Zero Program, LADOT has initiated a number of projects along various street corridors. These projects generally involve improvements to the streets, bicycle facilities, and pedestrian facilities such as installation or upgrading of crosswalks, traffic signals, and bicycle lanes to prevent deaths and severe injuries. There are currently no improvements projects planned on any of the nearby streets on the HIN.⁷

c. Future Cumulative Transportation Conditions

The Transportation Assessment also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. A list of related projects was prepared based on information obtained from the Department of City Planning and the LADOT, as well as recent studies of projects in the area. A total of five related projects are listed in Table III-1 and mapped in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. The related projects are generally located within a half-mile radius of the Project Site. Although the buildout years of many of the related projects are uncertain and may well extend beyond the Project's anticipated buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated 2029 Project buildout year for purposes of the traffic analysis. In accordance with the MOU, the future conditions analysis also assumes a 0.7 percent ambient growth rate per year through 2029 due to regional growth and development outside the Study Area.

The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to full occupancy of the Project. Therefore, the analysis of Future Conditions accounts for roadway improvements that have been funded and are expected to be implemented prior to full occupancy of the proposed Project. Other proposed roadway improvement projects that

⁷ City of Los Angeles, City of Los Angeles GeoHub, High Injury Network Projects Map, <https://ladotlivablestreets.org/programs/vision-zero/maps>, accessed July 1, 2026.

are not funded and traffic/trip reduction strategies such as TDM programs for individual buildings and developments were omitted from the Future Conditions analysis. The anticipated improvements are described below:

- **Metro D Line Extension:** An extension of the Metro D Line from its existing terminus at Wilshire/Western to Century City and Westwood is currently under construction and scheduled for completion in 2027. The project will add seven new stations and a reliable, high-speed transit connection between Downtown and the Westside. Stations are opening in three phases, with the first phase now open, including stations at Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega near the Project Site. The Wilshire/La Brea station is located approximately 340 feet east of the Project Site and opened in May 2026.

Additionally, in 2024, City of Los Angeles voters approved the Healthy Streets LA ballot measure. The ballot measure requires the City to implement the Mobility Plan 2035 when they repave or make improvements to a street. Both Wilshire Boulevard and La Brea Avenue in the vicinity of the Project are on the Comprehensive Transit Enhanced Streets Network and Bike Lane Network. While this indicates that at some point in the future the City would likely make transit and bicycle enhancements to these two corridors, the timeline, project description, and funding are not yet defined, and therefore, these investments are not considered related projects as they are too speculative at this time. Per the Los Angeles Safe Streets for All Initiative (Ordinance No. 188,198) adopted in April 2024, should the City make any improvement to a street segment of at least one-eighth of a mile in length, the street enhancements of the “mobility-enhanced networks” as described above shall also be installed along that segment as part of the improvements undertaken by the City.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

For this analysis, the Appendix G Thresholds above are relied upon. The methodology and base assumptions used in this analysis were established by LADOT and set forth in the TAG and MOU.

b. Methodology**(1) Requirements for Transportation Assessments**

In November 2018, the CNRA finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines 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 Guidelines 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 2019 and updated it in 2020 and again in 2022. The analysis in this section and the Transportation Assessment, included as Appendix J of this Draft EIR, uses the latest version of the TAG updated by LADOT in August 2022.

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

As described above, the CEQA Guidelines Transportation Threshold (a) requires an analysis of a project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below evaluates the Project's potential to conflict with the applicable plans, programs, ordinances, and policies identified in the Regulatory Framework subsection above.

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 not conflict with or be inconsistent with such plans and standards. Specifically, an impact would not occur merely for an inconsistency with or a failure to implement, an adopted plan, program, ordinance, or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies.⁸ Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the

⁸ City of Los Angeles Department of Transportation, *Transportation Assessment Guidelines*, page 2-2 August 2022.

plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a physical impact on the environment.

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

As part of evaluating a project's potential impacts under Threshold T-2.1 (VMT) of the TAG, LADOT's TAG establishes that a land use project may have a potential significant impact if the proposed project meets one or more of the following criteria:

- For residential projects, the project would generate daily household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located.
- For office projects, the project would generate daily work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC area in which it is located.
- For regional serving projects, including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT. Retail projects less than 50,000 square feet in size are considered local-serving and are assumed to have a negligible effect on VMT and are, therefore, not considered for the purposes of identifying significant VMT impacts. New retail uses greater than 50,000 square feet may also be considered local-serving if an applicant provides documentation that most of the vehicle trips would originate from the project area.

For mixed-use projects, the project VMT impact should be considered significant if, after taking credit for internal capture, the project's land use or land uses exceed any of the impact criteria set forth above.

Table 2.2-1 of the TAG identifies the daily household VMT per capita and daily work VMT per employee impact criteria (15 percent below the APC average) for the APC areas. The Project Site is located within the Central APC and, therefore, according to Table 2.2-1 of the TAG, has a daily household VMT per capita threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6.

A project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the 2024–2050 RTP/SCS in terms of development location, density, and intensity.

(b) *VTM Analysis Methodology*

The following describes the methodology by which vehicle trips and VMT are calculated in City of Los Angeles VMT Calculator Version 1.4 (VMT Calculator),⁹ as detailed in the City of Los Angeles VMT Calculator Documentation.¹⁰ LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips:

- Home-Based Work Production: trips to a workplace destination originating from a residential use;
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use; and
- Home-Based Work Attraction: trips to a workplace destination originating from a residential use.

As detailed in the City of Los Angeles VMT Calculator Documentation, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, while the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT as discussed in Appendix 1 of the State's *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

Other types of one-way trips considered in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips are factored into the calculation of total project VMT for screening purposes when determining if VMT analysis would be required.

The VMT Calculator accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City, as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT

⁹ Los Angeles Department of Transportation, *City of Los Angeles VMT Calculator, Version 1.4, June 2023*.

¹⁰ Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*.

Calculator include travel behavior zones, mixed-use development methodology, trip lengths, population and employment assumptions, and TDM measures, as further described below.

(i) Travel Behavior Zone

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in the 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. Per the VMT Calculator, the Project Site is located within Compact Infill (Zone 3).

(ii) Mixed-Use Development Methodology

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

- The project location's jobs/housing balance, which factors into how many trips are local or internal to a mixed-use project;
- Land use density of the project, which factors into the likelihood of short trips, as well as walking and bicycling;
- Transportation network connectivity, which affects the circuitry of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel;

- Availability of and proximity to transit, which affect the likelihood that residents or employees will travel via transit rather than automobile;
- Proximity to retail and other destinations, which affects the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities;
- Vehicle ownership rates, which lead to a higher rate of automobile trips with higher levels of vehicle ownership; and
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) and the number of people when calculating the daily VMT per capita.

(iii) Trip Lengths

The VMT Calculator determines a project's VMT based on the 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.

(iv) Population and Employment Assumptions

The VMT Calculator contains population assumptions based on Census data and employment assumptions derived from multiple data sources, including the *2012 Developer Fee Justification Study*, the San Diego Association of Governments Activity Based Model, *Trip Generation, 9th Edition*, the U.S. Department of Energy, and other modeling resources.^{11,12,13} A summary of the population and employment assumptions for various land uses is provided in Table 1 of the *City of Los Angeles VMT Calculator Documentation*.

(v) TDM Strategies

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

¹¹ *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012.*

¹² *Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, November 2012.*

¹³ *The 2024 LAUSD Developer Fee Justification Study and Trip Generation Manual, 11th Edition are currently available; however, the City's VMT Calculator utilized the editions indicated herein.*

- **Parking**—Reducing, unbundling, permitting, pricing parking.
- **Transit**—Transit subsidies, reduced headways, neighborhood shuttles.
- **Education and Encouragement**—Travel behavior change programs, promotions, and marketing.
- **Commute Trip Reductions**—Required commuter trip reduction programs, vanpool, ride-share.
- **Shared Mobility**—Car-share, bike share, school carpool programs.
- **Bicycle Infrastructure**—On-street bike facilities, bike parking, bike facilities, showers.
- **Neighborhood Enhancement**—Traffic calming and pedestrian network improvements.

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 by the California Air Pollution Control Officers Association in the report *Quantifying Greenhouse Gas Mitigation Measures*.¹⁴

(4) Hazardous Design Features

(a) Geometric Design Feature and Incompatible Uses

The TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. TAG Threshold T-3 requires that the determination of significance should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design), while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions like curves or grade changes, and a project's proximity to streets identified in the HIN or the Safe Routes to School program. Significance may be determined qualitatively or quantitatively as best suits the circumstances of each project. If a significant impact is identified, mitigation measures may include installation of new traffic control devices, redesign, or relocation of access points, turn restrictions, pavement markings, or vehicular demand management.

¹⁴ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*, August 2010.

(b) Freeway Safety Analysis

Section 2.4.4 of the TAG outlines the methodology of assessing potential vehicle to vehicle impacts that may result in unsafe vehicle queues from freeway off-ramp facilities due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp. Freeway safety analysis is required for a development project when the project adds 25 or more A.M. or P.M. peak-hour trips to any freeway off-ramp. A project would result in adverse safety conditions at such a ramp if each of the following three criteria were met:

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

If a potentially adverse safety condition is identified, corrective measures to be implemented to offset this potential condition could include TDM measures to reduce a project's trip generation, investments in active transportation or transit system infrastructure to reduce a project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to improve safety, not induce greater VMT, and not result in secondary environmental impacts.

(5) Emergency Access

In consultation with the Los Angeles Fire Department (LAFD), the analysis of the Project's potential emergency access impacts includes a review of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination is then made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede emergency access on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following project design feature associated with transportation:

- TR-PDF-1:** A Construction Traffic Management Plan would be developed by the contractor and reviewed and approved by the appropriate City departments prior to commencing construction to alleviate

construction period impacts, which may include but are not limited to the following measures:

- The Applicant will designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Publicly-visible signs will be posted at various locations with the liaison's information and phone number to contact regarding inquiries and/or complaints, including dust complaints. The South Coast Air Quality Management District's phone number will also be included to ensure compliance with applicable regulations related to dust.
- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people trained in pedestrian and bicycle safety at the Project Site's driveways) during all construction activities.
- Provide off-site truck staging area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City, will be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Establish requirements for loading/unloading and storage of materials on the Project Site, where parking spaces would be encumbered, the length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access would remain unobstructed for land uses in proximity to the Project site during Project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

As discussed in Section IV.E, Greenhouse Gas Emissions, the Project would also include Project Design Feature GHG-PDF-2 which states that the cost of residential parking will be unbundled from the cost of the residential units with the exception of affordable units.

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-1 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan, Wilshire Community Plan, Miracle Mile CDO, Plan for a Healthy Los Angeles, LAMC, Vision Zero, and the Citywide Design Guidelines. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

(a) Mobility Plan

The Mobility Plan combines “complete street” principles with the five goals that define the City's mobility priorities: Safety First; World Class Infrastructure; Access for All Angelenos; Collaboration, Communication, and Informed Choices; and Clean Environments and Healthy Communities.

The Mobility Plan further enumerates a variety of policies and programs in support of these goals. The Mobility Plan policies that are applicable to the Project are provided in Table IV.I-1 on page IV.I-33 along with a discussion of whether the Project would conflict with the applicable policies. As detailed therein and as concluded in the Transportation Assessment, the Project's proposed land uses and design features, including site access; pedestrian, bicycle, and transit accessibility; and loading areas, would not conflict with the policies of the Mobility Plan. In addition, the Project would not conflict with the implementation of future projects in the public ROW of Wilshire Boulevard, which is part of a PED, BEN, and TEN.

**Table IV.I-1
Potential for Project to Conflict with the Mobility Plan 2035**

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Chapter 1: Safety First	
Policy 1.1 Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing the policy. Primary pedestrian access to the Project Site would be along Cloverdale Avenue and Wilshire Boulevard. The Project pedestrian access points would be designed to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. The Project would incorporate pedestrian safety features along all driveways to minimize pedestrian vehicular conflicts and designed to LADOT standards and would be approved by LADOT. Lastly, while no bike lanes/paths currently exist in the immediate vicinity of the Project, the Project would not hinder future development of safe bike lanes/paths. On-site bike parking would be provided, and the Project would not interfere with bicycle enhancements the City may pursue in the future. Overall, the physical changes in the public would not degrade but would rather prioritize the safety and experience of the most vulnerable roadway users, including pedestrians and bicyclists. Therefore, the Project would not conflict with this policy.
Policy 1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing the policy. The Project would conform to all design element requirements, which may affect public rights-of-way (ROWs), including proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility. The Project would not conflict with the implementation of future projects in the public ROW of Wilshire Boulevard. The Project would also include the development of a mix of residential and commercial uses in close proximity to a number of public transportation options, thereby encouraging the use of alternative modes of transportation available in the vicinity of the Project Site. Therefore, the Project would not conflict with this policy.
Policy 1.3 Safe Routes to Schools: Prioritize the safety of school children on all streets regardless of highway classifications.	No Conflict. The Project would be located approximately 0.50 miles southwest of John Burroughs Middle School. No Safe Routes to School program is identified for John Burroughs Middle School. However, the Project would not impede the potential for a future Safe Routes to School program. Therefore, the Project would not conflict with this Policy 1.3.

Table IV.I-1 (Continued)
Potential for Project to Conflict with the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
Policy 1.6 Multi-Modal Detour Facilities: Design detour facilities to provide safe passage for all modes of travel.	No Conflict. Pursuant to Project Design Feature TR-PDF-1, the Project would implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, the Project would not conflict with this policy.
Chapter 2: World Class Infrastructure	
Policy 2.1 Adaptive Reuse of Streets: Design, Plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing the policy. The Project would not alter adjacent streets or the adjacent ROWs in a manner that would preclude or conflict with future changes by various City departments. All improvements within the public ROW would be designed and completed in consultation with LADOT, or other agencies, and in compliance with standard guidelines, including the requirements of the ADA. The Project would maintain the sidewalks along the Project Site frontages and would not encroach into the public ROW. Therefore, the Project would not conflict with this policy.
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.	No Conflict. The Project Site is designed to allow easy pedestrian access between Project land uses and between buildings with lighted and landscaped walkways. Beyond the Project Site, the sidewalks on Wilshire Boulevard, a PED, would be maintained and enhanced with new landscaping and trees. As previously discussed, primary pedestrian access to the Project Site would be along Cloverdale Avenue and Wilshire Boulevard. The Project's pedestrian access points would be designed to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Furthermore, pedestrian access to the existing commercial uses on Wilshire Boulevard would continue to be provided along Wilshire Boulevard and would not be changed. Therefore, the Project would not conflict with this policy.
Policy 2.4 Neighborhood Enhanced Network: Provide a slow speed network of locally serving streets.	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude the City from implementing the policy. The Project Site is designed to allow easy pedestrian access between Project land uses and between buildings with lighted and landscaped walkways. Beyond the Project Site, the sidewalks on Cloverdale Avenue, part of an NEN, would be maintained and enhanced with new landscaping and trees including three trees in the public ROW along Cloverdale. The Project would include a 5-foot street dedication along the portion of Cloverdale Avenue not

Table IV.I-1 (Continued)
Potential for Project to Conflict with the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	occupied by the existing building to remain. The proposed dedication would comply with LADOT standards and would not preclude or conflict with the City's plans to provide comfortable and safe routes for localized travel of slower-moving modes along this street. Therefore, the Project would not conflict with this policy.
Policy 2.5 Transit Network: Improve the performance and reliability of existing and future bus service.	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude future improvements to existing and future transit services or operations that would conflict with plans under development by Metro and/or LADOT. The Project also would not impact any existing transit stops or alter the public ROW along Wilshire Boulevard. The Project would encourage more transit usage by developing residential and commercial uses with convenient access to transit services, including the future Metro D Line Wilshire/La Brea Station. Therefore, the Project would not conflict with this policy.
Policy 2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities (includes scooters, skateboards, rollerblades, etc.).	No Conflict. Wilshire Boulevard, located immediately north of the Project Site, has been identified as part of the BEN. The Project would not preclude or conflict with the City from potential future implementation of bicycle infrastructure along this street. Therefore, the Project would not conflict with this policy.
Policy 2.9 Multiple Networks: Consider the role of each mode enhanced network when designing a street that included multiple modes.	No Conflict. As summarized in Policies 2.3 to 2.6 above and as detailed in the Transportation Assessment, the streets in the vicinity of the Project Site include a mix of enhanced networks identified as part of the Mobility Plan. The Project would improve the overall pedestrian experience surrounding the Project Site and would not conflict with the City's bicycle plans or transit and pedestrian improvements as identified in the Mobility Plan. Therefore, the Project would not conflict with this policy.
Policy 2.10 Loading Areas: Facilitate the provision of adequate on and off-street loading areas.	No Conflict. Vehicular access to the loading docks and trash areas would be provided via two, two-way driveways along Cloverdale Avenue and Detroit Street. As such, truck loading activities would result in a minimal impact on the surrounding street network and the loading area would not encroach on or block the public ROW. Therefore, the Project would not conflict with this policy.
Chapter 3: Access for All Angelenos	
Policy 3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	No Conflict. While this policy applies to the City and not development projects, the Project would recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes, as integral components of the City's transportation system by providing safe and accessible pedestrian, bicycle, and vehicular access. Specifically, the

Table IV.I-1 (Continued)
Potential for Project to Conflict with the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	Project would support residents, visitors, and employees who choose to travel by automobile through the provision of two, two-way, full-access driveways—one along Cloverdale Avenue and another along Detroit Street—and the provision of adequate parking supply to serve demand. In accordance with Project Design Feature TR-PDF-2, parking would be unbundled with the exception of the affordable units. The Project would encourage transit usage by developing high-density, multi-family housing uses and ground floor commercial space in a transit-rich area. As previously noted, the Project is serviced by Metro and LADOT. The Project Site is also located adjacent to the recently opened Metro D Line Wilshire/La Brea Station. The Project would provide 202 bicycle parking spaces (20 short-term, 182 long-term) on-site to encourage non-motorized transportation. Therefore, the Project would not conflict with this policy.
Policy 3.2 People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	No Conflict. Project development would comply with the applicable LADOT standards and applicable requirements of the ADA. Therefore, the Project would not conflict with this policy.
Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	No Conflict. The Project would provide high-density multi-family housing uses and ground floor commercial space in proximity to existing jobs (including those that may be offered on-site), commercial uses, destinations, and other neighborhood services. The Project would also be developed within close proximity to several public transit options including the recently opened Metro D Line Wilshire/La Brea Station. Therefore, the Project would not conflict with this policy.
Policy 3.7 Regional Transit Connections: Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.	No Conflict. The Project would not interfere with access to the recently opened Metro D Line Wilshire/La Brea Station located across Detroit Street east of the Project Site, which would improve access to major regional destinations via transit. Further, the Project would provide complementary bicycle amenities near the transit station, including a bike repair station to encourage non-vehicular transportation for residents, employees, and visitors. Therefore, the Project would not conflict with this policy.
Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	No Conflict. The Project would provide 202 bicycle parking spaces (20 short-term, 182 long-term) and bicycle amenities including a bike repair station to encourage bicycling for residents, employees, and visitors to the Project Site. The short-term bicycle parking spaces would be located throughout the ground floor of the Project Site, including along the Cloverdale Avenue and Detroit Street frontages and internal to the Project Site within a protected

Table IV.I-1 (Continued)
Potential for Project to Conflict with the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
	storage facility on Level 1. Therefore, the Project would not conflict with this policy.
Chapter 4: Collaboration, Communication, & Informed Choices	
Policy 4.13 Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.	No Conflict. As discussed in Section II, Project Description, of this Draft EIR, the Project would provide up to 439 vehicle parking spaces as required by the LAMC, comprised of 373 residential parking spaces and 66 commercial parking spaces within five above-grade levels and four below-grade levels. Therefore, the Project would not conflict with this policy.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.1 Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.	No Conflict. While this policy applies to the City and not development projects, the Project would promote a sustainable transportation system by locating high-density multi-family housing uses and ground floor commercial space in proximity to existing jobs (including those that may be offered on-site), retail and commercial uses, destinations, and other neighborhood services. As previously noted, the Project would provide 202 bicycle parking spaces (20 short-term, 182 long-term) on-site to encourage non-motorized transportation. The Project would also be developed within close proximity to a variety of public transportation options provided by Metro, LADOT, and AVTA including the future Metro D Line Wilshire/La Brea Station that opened in May 2026. Therefore, the Project would not conflict with this policy.
Policy 5.2 Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. The Project is estimated to generate lower VMT per capita for residents and employees than the average for the area, as demonstrated further below in Threshold (b). Additionally, the Project would improve bicycle and pedestrian infrastructure (including providing bicycle parking per the LAMC and a bike repair station), which would be beneficial to traffic flow, transit service, pedestrian circulation, and overall mobility in the Project area. Therefore, the Project would not conflict with this policy.
Policy 5.4 Clean Fuels and Vehicles: Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.	No Conflict. The Project would comply with applicable 2025 CALGreen EV charging requirements. Specifically, the Project would be required to provide Level 2 EV charging receptacles in 373 residential parking spaces and in 3 commercial parking spaces. An additional 13 commercial parking spaces are required to be EV ready capable of supporting future EVSE. Therefore, the Project would not conflict with this policy.

Table IV.I-1 (Continued)
Potential for Project to Conflict with the Mobility Plan 2035

Objective, Policy, Program, or Plan	Analysis of Project Consistency
<i>Source: Eyestone Environmental, 2026.</i>	

The Project would not conflict with Mobility Plan policies related to roadway safety. In particular, the Project would be designed and operated to prioritize the safety of all users. As previously described above, the Project would include two separate driveways into the Project Site and would be designed consistent with LADOT standards and ADA requirements. Furthermore, as discussed in Section II, Project Description, of this Draft EIR, the Project proposes to vacate and merge a 20-foot public alley that bisects the Project Site. The proposed vacation would not adversely affect the other public ROWs.

Additionally, the Project's mix of high-density residential uses and commercial uses served by a variety of public transit options, including the recently opened Metro D Line Wilshire/La Brea Station (located immediately east of the Project Site) and located in proximity to numerous museums, cultural institutions and other uses within the Miracle Mile neighborhood, would encourage the development of a sustainable transportation system and would support ways to reduce VMT consistent with the Mobility Plan's Clean Environments & Healthy Communities policies. The Project would also provide bicycle parking for residents, employees, and visitors, thereby promoting public and active transportation modes and reducing the Project VMT per capita compared to the average for the area, as demonstrated in the VMT analysis under Threshold (b) later in this section.

(b) Wilshire Community Plan

A detailed analysis of the Project's consistency with the applicable transportation-related goals, objectives, and policies of the Community Plan is provided in Table IV.I-2 on page IV.I-39. As detailed therein, the Project would not conflict with the applicable transportation and circulation goals, objectives, and policies of the Community Plan. The Project is a mixed-use development with multi-family residential uses and commercial uses within a TPA and would encourage the use of alternative modes of transportation by users. The Project would be consistent with the circulation standards and criteria of the Community Plan as the transportation system within the vicinity of the Project Site would adequately serve the traffic generated by the Project. Thus, the Project would not conflict with the policies of the Community Plan.

**Table IV.I-2
Project Consistency with the Wilshire Community Plan**

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Goal 11: Encourage a system of safe, efficient, and attractive bicycle and pedestrian facilities. Policy 11-1.4: Support the provision of bicycle facilities in all new development.	No Conflict. Pedestrian access to the Project Site would be provided via several existing entrances on Wilshire Boulevard and new entrance points along Cloverdale Avenue. The Project pedestrian access points would be designed to provide adequate sight distance, sidewalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Residents, visitors, and employees arriving at the Project Site by bicycle would have the same access opportunities as pedestrian visitors. Pursuant to LAMC Section 12.21 A.16, the Project would provide 202 bicycle parking spaces (20 short-term and 182 long-term) on the Project Site. The long-term bicycle parking spaces would be enclosed in protected storage facilities located on Levels B1, 1, and 2, which would be accessible via the parking garage and the short-term spaces would be located throughout the ground floor of the Project, including along the Cloverdale Avenue and Detroit Street frontages. The Project would also provide a bike repair station consistent with LAMC requirements. Therefore, the Project would not conflict with this goal and policy.
Objective 11-2: Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers. Policy 11-2.3: Protect and improve existing pedestrian oriented street segments.	No Conflict. As discussed above, pedestrian access to the Project Site would be provided via several existing entrances on Wilshire Boulevard and new entrance points along Cloverdale Avenue. The Project pedestrian access points would be designed to provide adequate sight distance, sidewalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. The Project would provide pedestrian amenities featuring short-term bicycle parking along the Cloverdale Avenue and Detroit Street frontages, and low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians. These Project elements, together with the location of the Project Site within a TPA and in close proximity to transit, would promote a safe, comfortable, and accessible pedestrian experience for all and encourage pedestrian activity. Therefore, the Project would not conflict with this objective.
Goal 12: Encourage alternative modes of transportation to reduce single-occupancy vehicular trips.	No Conflict. The Project Site is located in a TPA, PDA, and HQTC. As previously noted, the Project Site is well-served by a variety of public transit options provided by Metro and LADOT. The Project Site is also located adjacent to the recently opened Metro D Line Wilshire/La Brea Station. Additionally, the Project would also provide a total of 202 bicycle parking spaces (inclusive of 20 short-term and 182 long-term), which would encourage alternate modes of transportation. Therefore, the Project would not conflict with this goal.

Table IV.I-2 (Continued)
Project Consistency with the Wilshire Community Plan

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Objective 15-1: Provide off-street parking in appropriate locations in accordance with Citywide standards and community needs. Policy 15-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.	No Conflict. As discussed in Section II, Project Description, of this Draft EIR, the Project would provide 439 vehicle parking spaces as required by the LAMC, comprised of 373 residential parking spaces and 66 commercial parking spaces within five above-grade levels and four below-grade levels. Therefore, the Project would not conflict with this objective and policy.
^a Goals, Objectives, and Policies based on information provided in the Wilshire Community Plan (Los Angeles Department of City Planning, 2001). Source: Eyestone Environmental, 2026.	

(c) Miracle Mile Community Design Overlay

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is located within the boundaries of the Miracle Mile CDO. The Project would not conflict with Miracle Mile CDO Guideline 1 and its associated standard to orient buildings toward Wilshire Boulevard and adjacent cross-streets in order to encourage pedestrian activity along the sidewalks of the Miracle Mile and facilitate pedestrian access to and from the sidewalk to adjacent properties. Specifically, the existing commercial buildings along Wilshire Boulevard would be retained, and primary pedestrian access to these buildings would continue to be provided along Wilshire Boulevard and would remain unchanged. Furthermore, the sidewalks on Wilshire Boulevard, which are part of the PED, would be maintained and enhanced with new landscaping and three new street trees along Wilshire Boulevard. The Project would also not conflict with Guideline 2 and its associated standards to provide safety and mobility for pedestrian access to, across, and within the Project Site by locating vehicle access and loading areas where there will be minimal physical or visual impact on pedestrians, the flow of traffic, and/or adjacent uses. The Project would include two driveways into the Project Site that would be separate from the pedestrian access points and would be designed consistent with LADOT standards and ADA requirements. Furthermore, the Project would not conflict with the goal to encourage development that adds to a pedestrian-friendly retail environment and contributes to the safety and comfort of both pedestrian and automobile traffic. Specifically, the Project would provide highly-visually permeable ground floor commercial space along Cloverdale Avenue in addition to the existing retail buildings to remain on Wilshire Boulevard, thereby encouraging a pedestrian friendly retail environment that is easily accessible. Therefore, the Project would not conflict with the Miracle Mile CDO.

(d) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with transportation-related policies in Plan for a Healthy Los Angeles is provided in Table IV.I-3 on page IV.I-42. In summary, the Project would promote healthy living as a pedestrian and transit-oriented mixed-use development, which would encourage active travel modes and generate lower VMT per capita for employees than the average for the area, thereby reducing air pollutants that may affect vulnerable people. The Project would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities. Furthermore, the Project would support healthy lifestyles by locating jobs near transit (including the recently opened Metro D Line Wilshire/La Brea Station) within a TPA, providing bicycle amenities, and enhancing the pedestrian environment by providing shade trees within the public ROW for a more comfortable pedestrian environment. Furthermore, the Project would not displace any existing housing but, rather, would convert surface parking areas and existing commercial uses into a high-density development with local-serving commercial space.

(e) Los Angeles Municipal Code

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

LAMC Section 12.21 A.16 sets forth bicycle parking requirements for new developments. Pursuant to LAMC Section 12.21 A.16, the Project would provide 202 bicycle parking spaces (20 short-term, 182 long-term). The long-term bicycle parking spaces would be enclosed in protected storage facilities on Level B1, Level 1, and Level 2. Level B1 bicycle parking would be accessible from the parking garage, Level 1 bicycle parking would be accessible from the building lobby, and Level 2 bicycle parking would be accessible from both the Level 2 lobby and parking garage. The short-term bicycle parking spaces would be located throughout the ground floor of the Project Site, including along the Cloverdale Avenue and Detroit Street frontages and internal to the Project Site within a protected storage facility on Level 1. The Project would provide the LAMC-required bicycle parking and would not conflict with LAMC Section 12.21 A.16.

(ii) LAMC Section 12.26 J (TDM Ordinance)

The Project proposes the construction of 419 residential units, construction of 2,645 square-feet of restaurant uses, and renovation and reconfiguration of 42,092 square feet of existing commercial buildings along Wilshire Boulevard into office and restaurant uses. As LAMC Section 12.26 J applies only to the construction of new non-residential gross floor area and to developments in excess of 25,000 square feet of commercial area, the Project would not be subject to such requirements. Therefore, the Project would not conflict with LAMC Section 12.26 J.

**Table IV.I-3
Project Consistency With the Plan for a Healthy Los Angeles**

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
Chapter 2: A City Built for Health	
Policy 2.2: Healthy Building Design and Construction: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.	No Conflict. The Project would encourage sustainable transportation through the development of high-density multi-family housing uses and ground floor commercial space that would be located in a transit-rich area and include bicycle parking and enhanced sidewalks. As such, it would encourage the use of active travel modes and thereby promote healthy living. Therefore, the Project would not conflict with this policy.
Policy 2.4: Aging in Place. Mobilize and support a life-long process of active aging by making Los Angeles an “age-friendly” city that strives to create a positive, socially inclusive, and supportive environment, that encourages barrier-free buildings and streets, enhanced mobility and independence of people with disabilities, safe neighborhoods, and opportunities for volunteer and paid work.	No Conflict. The Project would not alter adjacent streets or the adjacent ROWs in a manner that would preclude or conflict with future changes by various City departments. All improvements within the public ROW would be designed and completed in consultation with LADOT, or other agencies, and in compliance with standard guidelines, including the requirements of the ADA. Pedestrian entrances would also be designed in accordance with LADOT standards and ADA requirements. Within the new building, the proposed features and amenities would be designed to accommodate access for residents and visitors with differing accessibility needs. Therefore, the Project would not conflict with this policy.
Policy 2.11: Foundation for Health. Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.	No Conflict. The Project would support active transportation by enhancing the pedestrian environment on and around the Project Site and by providing bicycle facilities. Restaurant uses on the ground level along Wilshire Boulevard and Cloverdale Avenue would engage with the surrounding streets and public spaces as well as maintain human scale, and new street trees and landscape elements would be incorporated along the Project Site frontages to provide a more comfortable and inviting environment for pedestrians. The Project would also include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. For bicycle facilities, the Project would provide the required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC Section 12.21 A.16. Therefore, the Project would not conflict with this policy.
Chapter 5—An Environment Where Life Thrives	
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution,	No Conflict. The Project is estimated to generate lower household VMT per capita and work VMT per employee than the average for the area, as demonstrated further in this section. The Project’s commercial uses would allow employees and visitors to travel to dining and shopping

Table IV.I-3 (Continued)
Project Consistency With the Plan for a Healthy Los Angeles

Objective, Policy, Program, or Plan ^a	Analysis of Project Consistency
especially for children, seniors and others susceptible to respiratory diseases.	nearby without using an automobile, resulting in a reduction in VMT. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC Section 12.21 A.16. Transit accessibility and the bicycle parking spaces provided on-site would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita. Therefore, the Project would not conflict with this policy.
^a Objectives, Policies, Programs, or Plans based on information provided in Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015). Source: Eyestone Environmental, 2026.	

(f) LADOT Vision Zero

As noted above, Wilshire Boulevard has been identified as part of the HIN. While no Vision Zero Safety improvements are currently planned near the Project Site,¹⁵ the Project does not propose any narrowing, shifting, or removing of existing sidewalk placement/paving along Wilshire Boulevard, and Project improvements to the pedestrian environment would not preclude future improvements by the City. Therefore, the Project would not conflict with Vision Zero.

(g) Citywide Design Guidelines

The Pedestrian-First Design approach of Citywide Design Guidelines identifies design strategies that create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting eyes and feet on the street. The Pedestrian-First Design guidelines are as follows:

¹⁵ City of Los Angeles, Vision Zero Safety Improvements, <http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861>, accessed July 1, 2026.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

Consistent with the Citywide Design Guidelines, the Project design includes separate pedestrian access points and pathways connecting to adjacent streets. The Project would enhance pedestrian activity on and around the Project Site by siting restaurant uses on the ground level along Wilshire Boulevard and Cloverdale Avenue, which would engage with the surrounding streets and public spaces as well as maintain human scale. New street trees and landscape elements would be incorporated along the Project Site frontages to provide a more comfortable and inviting environment for pedestrians. The Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Furthermore, as provided in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would implement several design features to enhance safety within and immediately surrounding the Project Site including, but not limited to: a closed-circuit camera system; a dedicated security team for the residential tower; sufficient lighting of buildings and walkways as well as parking areas, elevators, and lobbies; and entrances, spaces around buildings, and pedestrian walkways that are designed to be open and visible from surrounding sites.

Vehicular access to the Project Site would be provided via two, two-way driveways—one along Cloverdale Avenue and one along Detroit Street—that would provide access to parking area. Pedestrian access to the Project Site would be provided via several existing entrances on Wilshire Boulevard and new entrance points along Cloverdale Avenue. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Pedestrian entrances would be designed in accordance with LADOT standards and ADA requirements. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all. Therefore, the Project would not conflict with Citywide Design Guidelines 1 through 3.

(h) Other Plans and Policies

As discussed in detail in Section IV.F, Land Use and Planning, of this Draft EIR, the Project would not conflict with SCAG's 2024–2050 RTP/SCS policies to encourage pedestrian activity and reduce VMT. As indicated therein, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions by intensifying urban density within a SCAG-designated PDA, (i.e., a TPA, Livable Corridor, and NMA), as

well as an HQTC located in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office, retail, restaurant, and hotel uses; providing pedestrian and bicycle improvements; and would encourage the use of transit and other alternative modes of transportation which would reduce single-occupant travel. The Project would also support healthy and equitable communities by encouraging walking and bicycling, providing EV charging stations, facilitating a reduction of VMT and air pollution, and providing public realm improvements (i.e., new street trees and landscaping).

Furthermore, because the Project would be located within a SCAG-designated PDA and HQTC and in an area well-served by Metro rail and several local bus lines, the Project would contribute to the productivity and use of the regional transportation system. The Project would provide housing, employment, and local-serving uses near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with the 2024–2050 RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the 2024–2050 RTP/SCS goal of maximizing mobility and accessibility in the region while at the same time reducing VMT and GHG emissions.

In summary, the Project would not conflict with applicable transportation-related goals, objectives, and policies of SCAG's 2024–2050 RTP/SCS.

(i) Conclusion

Based on the analysis above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts related to a conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to a conflict with a program, plan, ordinance, or policy addressing the circulation system were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

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

As discussed above, the Project Site is located in the Central APC area and is subject to the LADOT thresholds of 6.0 household VMT per capita and 7.6 work VMT per employee for determining VMT impacts.

The City's VMT Calculator (Version 1.4, June 2023) was used to evaluate Project VMT and compare it to the VMT impact criterion. The VMT Calculator worksheets for the Project are included as Appendix D of the Transportation Assessment.

The Project's proposed land uses and their respective sizes are the primary input in the VMT Calculator. As discussed in Section II, Project Description, of this Draft EIR, the Project would retain and repurpose 42,092 square feet and demolish 6,137 square feet of the existing buildings. In total, new development would include 420,201 square feet of floor area consisting of approximately 44,737 square feet of commercial floor area, including office and restaurant uses, and up to 419 residential dwelling units. Based on the VMT Calculator results, as summarized in Table IV.I-4 on page IV.I-47, the Project would result in a household VMT per capita of 4.6 and a work VMT per capita of 6.7, which would be less than the 6.0 household VMT per capita and 7.6 work VMT per employee thresholds. Thus, the Project would not result in a significant impact with respect to household or work VMT as estimated by the VMT calculator. It is noted that this analysis is conservative in that it does not account for Project Design Feature GHG-PDF-2 which states that the cost of residential parking will be unbundled from the cost of the residential units with the exception of the affordable units, which would further reduce VMT. **Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and, as such, impacts associated with VMT would be less than significant.**

(2) Mitigation Measures

Project-level impacts with regard to VMT would be less than significant. Therefore, no mitigation measures are required.

**Table IV.I-4
VMT Analysis Summary**

Land Use Information	Project
Multi-Family Residential	372 du
Affordable Housing—Family	47 du
High-Turnover Sit-Down Restaurant	36,700 sf
Office	8,000 sf
VMT Analysis	
Residential Population ^a	986
Employee Population ^b	179
Project Area Planning Commission	Central
Total Daily VMT	24,274
Household VMT per Capita	4.6
Impact Threshold	6.0
Significant Impact?	No
Work VMT per Employee	6.7
Impact Threshold	7.6
Significant Impact?	No
<i>du = dwelling unit</i> <i>sf = square feet</i> ^a Population generation factors are embedded in the VMT Calculator and summarized in City of Los Angeles VMT Calculator Documentation (LADOT and the Department of City Planning, May 2020). Note that the precise generation rate used by the VMT Calculator for Multi-Family Residential (i.e., 2.253) does not match the VMT Calculator Documentation (i.e., 2.25). ^b Employment generation factors are embedded in the VMT Calculator and summarized in City of Los Angeles VMT Calculator Documentation (LADOT and the Department of City Planning, May 2020). Source: Fehr & Peers, 2024.	

(3) Level of Significance after Mitigation

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

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

(1) Impact Analysis

(a) Geometric Design Feature and Incompatible Uses

As evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the LAFD, and the LAMC. The Project would not include any new driveways and/or roads that would result in an increase in hazards due to a design feature. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial uses already present on the Project Site and in the surrounding area. Therefore, as concluded in the Initial Study, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses.

As such, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and the impact would be less than significant.

(b) Freeway Safety Analysis

As discussed above, the TAG provides guidance on freeway safety analyses for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

LADOT's TAG requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hours to be studied for potential queueing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required.

As shown in Table IV.I-5 on page IV.I-49, the Project would add fewer than 25 trips to the freeway off-ramps analyzed in both the morning and afternoon peak hours. Therefore, further analysis is not required, and the Project would not increase hazards related to freeway off-ramps.

**Table IV.I-5
Project Trip Volumes Added to Off-Ramps**

Off-Ramp Location	Project-Added Trip Volumes	
	A.M. Peak Hour	P.M. Peak Hour
US-101 Southbound Off-Ramp at Highland Avenue	7	12
I-10 Eastbound Off-Ramp at Fairfax Avenue and Washington Boulevard	7	12
I-10 Westbound Off-Ramp at La Brea Avenue	7	12
Source: Fehr & Peers, 2024.		

Based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts, including freeway safety impacts, would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to hazardous geometric design features or incompatible uses would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to hazardous geometric design features or incompatible uses 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?

As evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, while it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent ROWs during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, as discussed in Project Design Feature TR-PDF-1, above. Regarding operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project

would comply with LAFD access requirements and applicable LAFD regulations regarding safety. As such, as concluded in the Initial Study, the Project would not result in inadequate emergency access. **Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.**

e. Cumulative Impacts

As shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR, a total of five related projects are located generally within 0.5-miles of the Project Site. The related projects comprise a variety of uses, including residential, commercial, office, and hotel uses, as well as mixed-use developments incorporating some or all of these elements. Although the buildout years of the related projects are uncertain and may well extend beyond the Project's buildout year, and notwithstanding that some may not ultimately be approved or developed, all related projects were assumed to be completed by the estimated Project buildout year (i.e., 2029) for purposes of the traffic analysis.

(1) Impact Analysis

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

In accordance with the TAG, the cumulative analysis of consistency with transportation plans and policies must include consideration of the related projects within 0.5-miles of the Project Site and any transportation system improvements in the vicinity of the Project Site.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, the Project's impacts in terms of conflicts with programs, plans, ordinances, or policies addressing the circulation system would be less than significant. The majority of the programs, plans, policies, and ordinances reviewed under Threshold (a) above do not apply cumulatively to multiple development projects. For example, the bicycle parking requirements detailed in LAMC Section 12.21 A.16 and the TDM Ordinance from LAMC Section 12.26 J apply to projects individually. Also, in many cases, the Project would specifically support key policies (such as enhancing pedestrian infrastructure), while nearby related projects would neither support nor interfere with such policies. In addition, each related project would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would not result in significant inconsistencies with applicable transportation plans; as such, the Project would not contribute considerably to any cumulative inconsistencies. **Therefore, cumulative impacts with respect to conflicts with transportation-related programs, plans, policies, and ordinances, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

As discussed in the TAG, a development project would have a cumulative VMT impact if it were to result in significant Project-level VMT impacts and were deemed inconsistent with the SCAG 2024–2050 RTP/SCS in terms of development location, density and intensity. However, based on the TAG, a project that does not result in a significant VMT impact using the City's methodology described above would be in alignment with the RTP/SCS and, therefore, would also have no cumulative VMT impact. As indicated in the Project-level analysis under Threshold (b) above, the Project would result in a less-than-significant VMT impact. The Project would also not conflict with the RTP/SCS as indicated in the Project-level analysis under Threshold (a) above (Refer to Section IV.F, Land Use and Planning, of this Draft EIR for a detailed discussion of the Project consistency with the SCAG RTP/SCS). **Therefore, cumulative impacts with respect to CEQA Guidelines Section 15064.3(b) would be less than significant.**

(c) Hazardous Geometric Design Features

As discussed in the Project-level analysis under Threshold (c) above, the Project would not itself result in a significant impact associated with hazardous geometric design features. According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts. There are no related projects with access points proposed on the same block. In addition, similar to the Project, the related projects would be individually responsible for complying with the City's design standards and the guidelines (such as driveway spacing requirements) to address potential safety conflicts.

As previously discussed, a project would not have the potential to result in significant freeway safety impact unless it adds 25 or more trips to any off ramp in either the morning or afternoon peak hours. As indicated in the Project-level analysis under Threshold (c) above, as the Project trips would not exceed this screening threshold at any area off ramps, and the Project's impacts to freeway safety would be less than significant. As such, the Project would not make a considerable contribution to cumulative freeway safety impacts. **Therefore, cumulative impacts related to hazardous geometric design features would not occur.**

(2) Mitigation Measures

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric design features; and emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; VMT/CEQA Guidelines Section 15064.3; hazardous geometric design features; and emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.