

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 *Transportation Assessment for 9000 Airport Boulevard* (Transportation Assessment) prepared for the Project by Gibson Transportation Consulting, dated October, 2025, and included in Appendix I.1 of this Draft EIR. The Transportation Assessment was prepared pursuant to the Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines (TAG)* dated July 2020 and updated in August 2022, which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California. The Transportation Assessment was also prepared pursuant to a Memorandum of Understanding (MOU) for the Project reviewed and approved by LADOT in June 25, 2025, and included as Appendix A of the Transportation Assessment. The Transportation Assessment was approved by LADOT in October, 2025. A copy of LADOT's Assessment Letter for the Transportation Assessment is included as Appendix I.2 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Americans with Disabilities Act of 1990 (ADA)
- Complete Streets Act
- Assembly Bill (AB) 32 and Senate Bill (SB) 375
- California Vehicle Code
- Senate Bill 743

- CEQA Guidelines Section 15064.3
- Southern California Association of Governments (SCAG) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS)
- City of Los Angeles Mobility Plan 2035
- Westchester–Playa del Rey Community Plan
- Los Angeles Municipal Code (LAMC)
- LADOT Transportation Assessment Guidelines (TAG)
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles
- Coastal Transportation Corridor Specific Plan

(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 ADA 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 miles of a major 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 Section 21806 defines 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)¹ 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 level of service (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 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

¹ Effective July 1, 2024, the Governor's Office of Planning and Research was renamed the Governor's Office of Land Use and Climate Innovation (LCI).

Guidelines Section 15064.3, which is discussed further below, establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

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 stop² or a stop along an existing high-quality transit corridor³ 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 1.5 (October 2024) (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.

² "Major transit stop" is defined in Public Resources Code (PRC) Section 21064.3 as a site containing an existing rail or bus rapid 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.

³ "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.

(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), 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 (SOI) (in unincorporated areas only).⁴ These areas account for approximately 8.2 percent of the SCAG region’s total land area and 66 percent of forecasted household growth and 54 percent of forecasted employment growth between 2019 and 2050. TPAs 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 an 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

⁴ SCAG, 2024–2050 RTP/SCS, April 2024, Map 3.4 Priority Development Areas.

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 (TDM). 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
- 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 an 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 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.

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.

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.*

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

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.
- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) Westchester–Playa del Rey Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's

General Plan Framework Element (Framework Element) at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Westchester–Playa del Rey Community Plan area. The Westchester–Playa del Rey Community Plan includes the following transportation and circulation objectives that are applicable to the Project:

Objective 14-1: Continue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Westchester-Playa del Rey Community Plan Area.

Objective 14-2: Increase work trips and non-work trips made on public transit

Objective 15-1: Pursue TDM strategies that maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policy 15-1.4: Promote the development of transportation facilities and services that encourage higher transit ridership, increased vehicle occupancy, and improved pedestrian and bicycle access.

Policy 16-1.4: Support the provision of bicycle facilities in all new development.

Objective 16-2: To promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.

Policy 17-1.1: Minimize the number of ingress and egress points to and from all arterials in the Westchester-Playa del Rey Community Plan Area.

Policy 17-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.

(c) Los Angeles Municipal Code

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

(d) LADOT Transportation Assessment Guidelines

As discussed above, pursuant to CEQA Guidelines Section 15064.3 that implement SB 743, the City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG 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

Section 2.4 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 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.⁷

(e) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the basic criteria for the review of driveway design. As discussed in MPP Section 321, the basic principle of driveway location planning is to minimize potential conflicts between users of the parking facility and users of the abutting street system, including the safety of pedestrians.

(f) Vision Zero

The Vision Zero program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last 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.

(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.

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

⁷ LADOT, *Transportation Assessment Guidelines*, August 2022, p. 2-19.

(h) 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.⁸ Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

(i) Los Angeles Coastal Transportation Corridor Specific Plan

The Project Site is located within the boundaries of the Los Angeles Coastal Transportation Corridor Specific Plan (Specific Plan) established pursuant to Ordinance No. 168,999.⁹ The regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of Chapter 1 of the LAMC, as amended, and any other relevant ordinances, and do not convey any rights not otherwise granted under the provisions and procedures contained in the LAMC and other relevant ordinances. Provisions within the Specific Plan supersede the applicable regulations of the LAMC unless overridden by the LAMC or another adopted ordinance. There are no specific policies applicable to the Project, however the Project meets the the intent of the Los Angeles Coastal Transportation Corridor Specific Plan, which is to establish a transportation impact mitigation program that achieves the following purposes:

- Implement City and state policies concerning transportation, including the City of Los Angeles' General Plan Framework Element and Mobility Plan 2035, and state legislation (including SB 375, SB 743, and AB 1358) that reprioritize transportation improvements to focus on access to transit and active transportation as strategies to reduce dependence on vehicular travel, and reduce VMT and associated greenhouse gas emissions;
- Improve mobility options within the plan area by providing transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, vehicle), primarily within existing available right-of-way, as part of a transportation system that is consistent with the City's General Plan Elements (Community Plans and Mobility Plan 2035);

⁸ City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, 2015.

⁹ The City of Los Angeles Department of City Planning has proposed amendments to the Los Angeles Coastal Transportation Corridor Specific Plan. The Draft EIR for the proposed Specific Plan amendments was released in January 2016, and the Final EIR was released in September 2016. The City Planning Commission heard proposed amendments to the Coastal Transportation Corridor Specific Plan in March 2018; however, no formal action on these amendments has been taken to date.

- Produce fewer auto trips per capita and decrease VMT per capita by increasing multimodal transportation options and promoting best practices in TDM;
- Enhance mobility and connectivity along key transportation corridors, particularly by planning for dedicated transit lines that serve north-south corridors, including Lincoln and Sepulveda Boulevards, and provide connections to planned east-west transit lines;
- Enhance the transportation system by planning for better regional transit connectivity and “first mile–last mile” solutions such as better pedestrian conditions, bike share, improved bicycle facilities, and circulator bus service;
- Encourage walking and bicycling as a means to safely and conveniently access transit and circulate within and between neighborhoods;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Mitigate the transportation impacts resulting from new development within the plan area by providing a mechanism to fund and implement specific transportation improvements;
- Establish the Transportation Impact Assessment Fee in compliance with the Mitigation Fee Act for new development within the plan area;
- Ensure that costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts;
- Ensure that contributors to this Specific Plan’s fund benefit from the public transportation, bicycle, and pedestrian improvements constructed using Transportation Impact Assessment Fee funds;
- Enhance the streetscape environment and reinforce the neighborhood identity on portions of major arterials by using a consistent palette of amenities to improve streetscape aesthetics, promoting sustainable landscaping practices, creating a more inviting pedestrian environment that supports local commerce, and providing a pleasant and safe active transportation experience.
- Encourage parking strategies, such as demand-based pricing schemes, capacity management, travel demand management programs, and shared parking to manage parking supply.
- Promote neighborhood protection programs, where feasible, when implementing multimodal improvements, in order to minimize intrusion of commuter traffic through residential neighborhoods by the implementation of non-restrictive traffic calming measures;

- Reduce Trips by supporting the development of affordable housing at or near job sites and near transit, consistent with City policies;
- Establish Transportation Impact Assessment Fees that do not hinder the development of housing for diverse income levels in the Westside, including affordable housing for moderate, low, and very low income levels; and
- Ensure that development projects that are implemented in a phased manner include appropriate mitigations for each individual development phase.

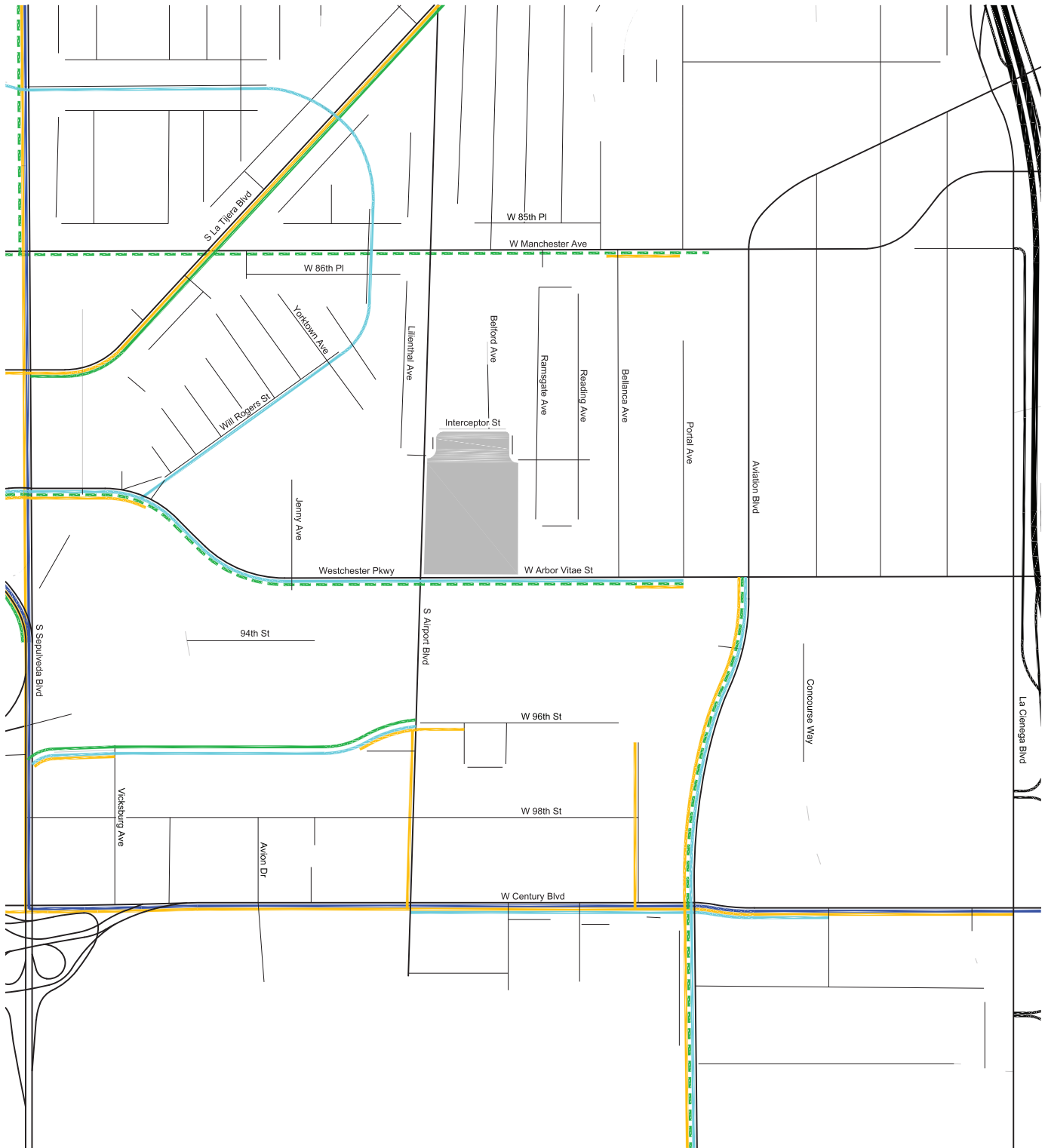
b. Existing Conditions

The Project's transportation study area (Study Area) includes a geographic area of approximately 0.25 miles around the Project Site identified in consultation with LADOT in accordance with the TAG. The existing street system, transportation facilities and transit service within the Study Area, are shown in Figure IV.I-1 on page IV.I-16 and in Figure IV.I-2 and Figure IV.I-3 on pages IV.I-20 and IV.I-21, respectively, and are described in further detail below.

(1) Existing Project Site Conditions

The Project Site is bounded by South Interceptor Street to the north, West Arbor Vitae Street to the south, residential uses and surface parking to the east, and South Airport Boulevard to the west. Local vehicular and pedestrian access to the Project Site is provided by South Airport Boulevard, Sepulveda Boulevard, and Westchester Parkway located west of the Project Site, Manchester Boulevard located north of the Project Site, La Cienega Boulevard located east of the Project Site, and West Arbor Vitae Street and Century Boulevard located south of the Project Site. Primary regional vehicular access to the Project Site is provided by the San Diego Freeway (I-405), which is located approximately 0.8 miles east of the Project Site. The Project Site is located within a fully developed area and is located in a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA), as well as a HQTIC.

The Project Site is currently developed with an approximately 37,860-square-foot rental car facility consisting of two single-story buildings with maintenance facilities and office uses, as well as surface parking. Additionally, the Project Site contains accessory structures including a carwash, solar panel canopies, and fueling station canopies. Access to the Project Site is provided via vehicle ingress/egress along Interceptor Street and egress onto West Arbor Vitae Street, as well as bus ingress along South Airport Boulevard and egress along West Arbor Vitae Street. The perimeter of the Project Site is secured with chain link fencing and concrete block walls. Further, two double-sided advertising billboards are located within the Project Site boundaries along South Airport Boulevard.



LEGEND



Project Site

Transit Enhanced Network

Neighborhood Enhanced Network

Pedestrian Enhanced District

Bicycle Enhanced Network

Bicycle Lane Network



N
Not to Scale

Figure IV.I-1
Existing Street System

(2) Existing Street System

As shown in Figure IV.I-1 on page IV.I-16, the existing street system that serves the Study Area consists of a regional roadway system including freeways, arterials, collector, and local streets, which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site.

(a) Freeways

Primary regional vehicular access to the Project Site is provided by the San Diego Freeway (I-405), which is located approximately 0.8 miles east of the Project Site.

(b) Streets

Listed below are the freeways and roadways within the Study Area that provide regional and local access to the Project Site:

- West Manchester Avenue is a designated Boulevard II¹⁰ in the Mobility Plan. It travels in the east-west direction and is located north of the Project Site. It provides four travel lanes, two in each direction, landscaped medians, left-turn lanes at intersections, and Class II bike lanes (i.e., dedicated striping to separate vehicular traffic from bicycle traffic) on both sides of the roadway within the Study Area. On-street parking is not available within the Study area. Travel lanes are generally 10 feet wide, and the total paved width of the street is approximately 80 feet within the Study Area.
- Interceptor Street is a designated Local Street¹¹ in the Mobility Plan. It travels partially adjacent to the western and eastern boundaries of the Project Site and adjacent to the northern boundary of the Project Site. It generally runs in the east-west direction and provides two travel lanes, one in each direction. Unmetered parking is generally available on both sides of the street within the Study Area. Travel lanes are generally 12 feet wide, and the total paved width of the street is approximately 36 feet within the Study Area.
- South Airport Boulevard is a designated Boulevard II in the Mobility Plan. It travels in the north-south direction and is located adjacent to the western boundary of the Project Site. It provides five travel lanes, two to three lanes in each direction, with a two-way left-turn median and left-turn lanes at signalized intersections. On-street parking is not available on the street within the Study Area. Class IV

¹⁰ Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph and generally includes a right-of-way (ROW) width of 110 feet and pavement width of 80 feet.

¹¹ A street that primarily provides direct access to abutting properties and is not intended to carry through traffic. Local streets typically have lower speed limits, less traffic volume, and are designed to serve residential neighborhoods or small commercial areas.

protected bike lanes are provided on both sides of the street north of West Arbor Vitae Street and south of West Manchester Avenue within the Study Area. Travel lanes are generally 10 feet wide, and the total paved width of the street is approximately 78 feet within the Study Area.

- West Arbor Vitae Street is a designated Modified Boulevard II in the Mobility Plan. It travels in the east-west direction and is located adjacent to the southern boundary of the Project Site. It provides four travel lanes, two lanes in each direction, with a two-way left-turn median and left-turn lanes signalized intersections. Limited on-street parking is available on the street within the Study Area. Travel lanes are generally 10 feet wide, and the total paved width of the street is approximately 95 feet within the Study Area.
- West 96th Street is a designated Modified Collector¹² in the Mobility Plan. It travels in the east-west direction and is located south of the Project Site. It provides two to four travel lanes in each direction. Class II bike lanes are provided west of South Airport Boulevard. On-street parking is not available on the street within the Study Area. Travel lanes are generally 13 feet wide, and the total paved width of the street is approximately 60 feet within the Study Area.
- South Aviation Boulevard is a designated Modified Boulevard II in the Mobility Plan. It travels in the north-south direction and is located east of the Project Site. It provides four travel lanes, two in each direction and left-turn lanes at signalized intersections. Limited on-street metered parking is available on the east side of the street within the Study Area. Travel lanes are generally 10 feet wide, and the total paved width of the street is approximately 55 feet within the Study Area.

(3) Existing Bicycle and Pedestrian Facilities

(a) Pedestrian Facilities

Existing pedestrian facilities adjacent to the Project Site include a sidewalk seven feet wide along Interceptor Street, an eight-foot-wide sidewalk along South Airport Boulevard, and an 8.5-foot-wide landscaped, shaded sidewalk along West Arbor Vitae Street. These sidewalks connect to accessible pedestrian crossings at signalized intersections within the Study Area.

(b) Bicycle Facilities

The Mobility Plan and 2010 Bicycle Plan guide implementation of bicycle infrastructure. The Mobility Plan consists of a Bicycle Enhanced Network (BEN) and a

¹² A street that connects local streets to arterial streets, serving both land access and traffic circulation within residential, commercial, and industrial areas. Collector streets typically carry moderate volumes of traffic and may have restrictions on parking or turning movements to improve flow.

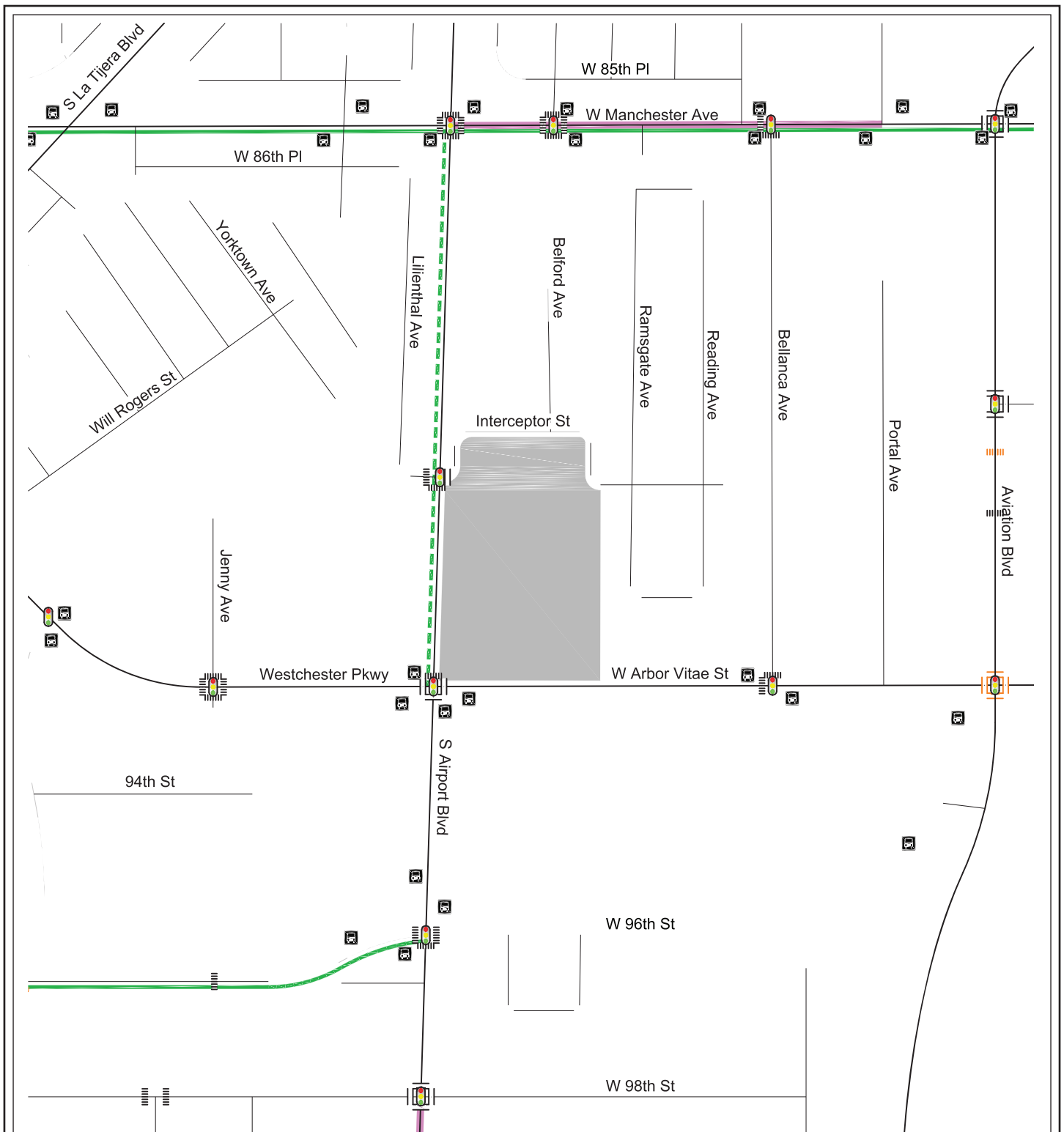
Bicycle Lane Network (BLN). The BEN is a subset of and supplement to the 2010 Bicycle Plan and is comprised of a network of streets that prioritize bicyclists and provide bicycle paths (Class I) and protected bicycle lanes (Class IV). The BLN consists of Class II bicycle lanes, a component of street design with dedicated striping to separate vehicular traffic from bicycle traffic, and Class III bicycle lanes (sharrows), where motorists and bicyclists share the roadway and there is no separated striping for bicycle travel. As indicated in Figure IV.I-2 on page IV.I-20 and based on the City's 2010 Bicycle Plan, bicycle facilities in the vicinity of the Project Site include Class IV bicycle lanes along South Airport Boulevard between Manchester Boulevard and West Arbor Vitae Street, and Class II bicycle lanes are provided along Manchester Avenue as well as 96th Street within the Study Area.

(4) Existing Transit Service

The Project Site is located within a TPA, which is defined by Public Resources Code (PRC) Section 21099 (a) as an area within 0.5 miles of an existing or planned major transit stop. A major transit stop, as defined by PRC Section 21064.3, is a site containing an existing rail or bus rapid 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, as amended. As detailed in the Transportation Assessment and as indicated in Figure IV.I-3 on page IV.I-21 and in Table IV.I-1 on page IV.I-22, the Study Area is served by a number of public transit lines, including multiple Metro, Big Blue Bus, and Culver City Bus lines with service to a major transit stop within 0.5 miles from the Project Site. Specifically, the Project Site is located at the intersection of Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, which currently provides bus stops with intersecting service headways of 20 minutes or less for LA Metro Local 117¹³, Santa Monica Big Blue Bus 3, and Culver City Bus 6. Therefore, the intersection of Airport Boulevard and West Arbor Vitae Street/Westchester Parkway would currently qualify as a Major Transit Stop. It should be noted that the Project Site is also located within 0.4 miles of the LAX/Metro Transit Center Station at the intersection of Aviation Boulevard and 96th Street, which provides service to the Metro C and K Lines, as well as numerous Metro Bus, Santa Monica Big Blue Bus, and Culver CityBus lines.¹⁴

¹³ The LAX/Metro Transit Center opened June 6, 2025. The LAX/Metro Transit Center serves as the terminus for Metro Local 117, which travels along Sepulveda Boulevard. The LAX/Metro Transit Center also serves as a stop for the Metro C and K Lines and qualifies as a major transit stop. The Project Site is located within 0.50 miles of the LAX/Metro Center Station and, thus, is located within a Transit Priority Area.

¹⁴ Metro, LAX/Metro Transit Center, www.metro.net/lax-metro-transit-center/, accessed September 29, 2025.

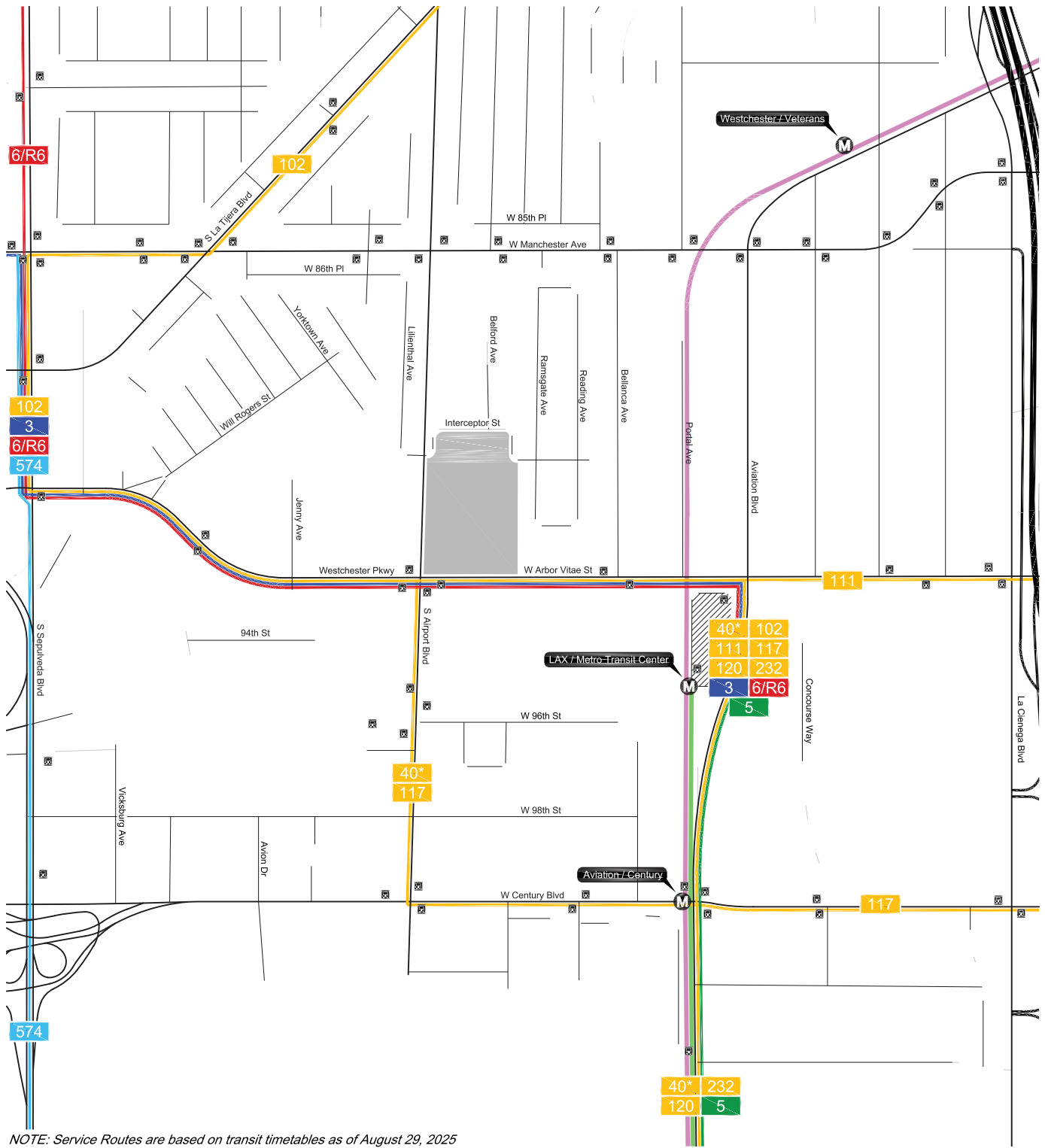


LEGEND

- | | | | |
|---|---|---|---|
|  Project Site |  Metro Rail Station |  Pedestrian Crossing |  Class II Bicycle Lane |
|  Bus Stop |  Pedestrian Crossing near School |  Class IV Protected Bicycle Lane | |
|  High-Injury Network |  Signalized Intersection | | |



Figure IV.I-2
Existing Transportation Facilities



NOTE: Service Routes are based on transit timetables as of August 29, 2025

LEGEND

- | | | | |
|--------------------|--------------|------------------|---------------------------|
| Project Site | Metro C Line | Metro Bus | Santa Monica Big Blue Bus |
| Metro Rail Station | Metro K Line | Culver CityBus | GTrans Bus |
| Bus Stop | | Commuter Express | |



*Owl Route

Figure IV.I-3
Existing Transit Network

**Table IV.I-1
Existing Bus Transit Service**

Transit Stop ^a	Bus Service	Corridor	Service Type	Hours of Operation	Peak Period Frequencies (minutes) ^{b,c}	
					NB/EB	SB/WB
S. Airport Blvd. & W. Arbor Vitae St./ Westchester Pkwy.	Metro Bus Service					
	40 (owl) Downtown LA–South Bay Galleria via ML King Blvd.–Hawthorne Blvd.	Airport	Local	1:00 A.M.–5:30 A.M.	N/A	N/A
	102 LAX City Bus Center–South Gate via La Tijera–Exposition Blvd.	Westchester	Local	5:00 A.M.–11:40 P.M.	60	60
	117 LAX City Bus Center–Downey via Century Blvd.–Imperial Hwy.	Century	Local	4:00 A.M.–2:00 A.M.	15	15
	Culver CityBus					
	3 Aviation Station C Line to Downtown Santa Monica	Manchester	Local	4:45 A.M.–12:00 A.M.	10	11
	6 Westwood–UCLA–Aviation Station via Sepulveda Blvd.	Westchester	Local	5:00 A.M.–12:00 A.M.	16	16
LAX/Metro Transit Center	Metro Bus Service					
	6 Westwood–UCLA–Aviation Station via Sepulveda	Westchester	Local	5:00 A.M.–12:00 A.M.	16	16
	40 (owl) Downtown LA–South Bay Galleria via ML King Blvd.–Hawthorne Blvd.	Century	Local	1:00 A.M.–5:30 A.M.	N/A	N/A
	102 LAX City Bus Center–South Gate via La Tijera–Exposition Blvd.	Manchester	Local	5:00 A.M.–11:40 P.M.	60	60
	111 LAX City Bus Center–Norwalk Station via Florence Ave.	Florence	Local	4:00 A.M.–12:30 A.M.	21	20
	117 LAX City Bus Center–Downey via Century Blvd.–Imperial Hwy.	Century	Local	4:00 A.M.–2:00 A.M.	15	15
	120 Aviation/LAX Station–Whittwood Center via Imperial Hwy.	Aviation	Local	4:00 A.M.–1:00 A.M.	42	47
	232 LAX City Bus Center–Long Beach via Sepulveda Blvd., PCH	Century	Local	4:15 A.M.–1:00 A.M.	19	21
	Metro Rail Service					
	C Norwalk–Aviation/Century	Aviation	Regional	3:45 A.M.–12:30 A.M.	10	10
	K Expo/Crenshaw–Redondo Beach	Aviation	Regional	3:45 A.M.–1:00 A.M.	10	10
	Santa Monica Big Blue Bus					
	3 Aviation Station C Line to Downtown Santa Monica	Manchester	Local	4:45 A.M.–12:00 A.M.	10	11
	Culver CityBus					
	R6 Westwood–UCLA–Aviation Station via Sepulveda Blvd.	Sepulveda	Local	5:00 A.M.–12:00 A.M.	15	15
Airport Blvd. & 96th St.	Metro Bus Service					
	40 (owl) Downtown LA–South Bay Galleria via ML King Blvd.–Hawthorne Blvd.	Airport	Local	1:00 A.M.–5:30 A.M.	N/A	N/A
	117 LAX City Bus Center–Downey via Century Blvd.–Imperial Hwy.	Century	Local	4:00 A.M.–2:00 A.M.	15	15

Table IV.I-1 (Continued)
Existing Bus Transit Service

Transit Stop ^a	Bus Service	Corridor	Service Type	Hours of Operation	Peak Period Frequencies (minutes) ^{b,c}	
					NB/EB	SB/WB
<i>Metro = Los Angeles County Metropolitan Transportation Authority</i> ^a <i>The intersection of Airport Boulevard & Arbor Vitae Street/Westchester Parkway is located adjacent to the Project Site. The LAX/Metro Transit Center is located approximately 1,700 feet southeast of the Project Site, and the intersection Airport Boulevard & 96th Street is approximately 1,200 feet from the Project Site.</i> ^b <i>Service routes and frequencies are based on transit timetables as of August 29, 2025.</i> ^c <i>Peak period frequencies are measured during the combined seven-hour morning (6 A.M.–9 A.M.) and afternoon (3 P.M.–7 P.M.) peak periods.</i> <i>Source: Gibson Transportation Consulting, 2025.</i>						

(5) 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 indicated in Figure IV.I-2 on page IV.I-20, none of the streets adjacent to the Project Site have been identified as part of the HIN. Within the Study Area, Manchester Avenue, located 0.3 miles north of the Project Site, is identified as part of the HIN.

c. Future Cumulative Transportation Conditions

(1) Related Projects and Ambient Growth

In accordance with the TAG and MOU, the future conditions analysis incorporates a list of related projects compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the area. A total of four related projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. These related projects are projects that are located within an approximately 0.5-mile radius from the Project Site. Some of the related projects may not be built out by 2027 (i.e., the anticipated Project buildout year), may never be built, or may be approved and built at reduced densities. Nevertheless, to provide a conservative cumulative impact analysis, the analysis assumes that the related projects will be fully built out by 2027, unless otherwise noted. In accordance with the MOU, the future conditions analysis also assumes a one percent increase in ambient growth through 2027 due to regional growth and development outside the Study Area.

(2) Future Base Transportation System Improvements

(a) Future Roadway Improvements

The transportation network within the Study Area could be affected by regional improvement plans, local specific plans, and programmed improvements implemented prior to buildout of the Project in 2027. Therefore, the analysis of Future Conditions accounts for roadway improvements that are or would be funded and are reasonably expected to be implemented prior to buildout of the Project. Other proposed roadway improvement projects that 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 following proposed improvements were evaluated for their potential effects on the future roadway configurations:

- Metro K Line Northern Extension—The Metro K Line Extension project would extend the Metro K Line route north from its current terminus at the Crenshaw/Expo Station, which provides a connection to the Metro E Line, north to Miracle Mile, with a connection to the Metro D Line, and Hollywood, with a connection to the Metro E Line. The Metro K Line Extension would link the South Bay, LAX, South Los Angeles, and Inglewood to Mid-City, Central Los Angeles, West Hollywood, and Hollywood. The environmental review process is currently underway, and completion of the Metro K Line is anticipated in 2049.
- LAX Automated People Mover—The APM is a 2.25-mile elevated guideway transit system proposed as part of the LAX Landslide Access Modernization Program. The APM would connect passengers between LAX and new off-site parking, car rental, and transit facilities. The APM is anticipated to be fully operational in 2026 and is located 0.4 miles south of the Project Site.

Additionally, in the Mobility Plan, the City identifies key corridors of mobility-enhanced networks. Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. However, as shown in Figure IV.I-1 on page IV.I-16, the following mobility-enhanced networks are located within the Study Area:

- TEN: The TEN aims to improve existing and future bus services through reliable and frequent transit service in order to increase transit ridership, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments within the surrounding street system. Sepulveda Boulevard and Century Boulevard within the Study Area are designated as part of the TEN.
- NEN: The NEN reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are slow moving and safe enough to connect neighborhoods through active transportation. West Arbor Vitae Street,

96th Street, and Century Boulevard within the Study Area are designated as part of the NEN.

- **BLN/BEN:** Manchester Avenue and Aviation Boulevard near the Project Site and West Arbor Vitae Street adjacent to the Project Site are designated as part of the BEN. No roadways within the Study Area are designated as part of the BLN.
- **PED:** The Mobility Plan aims to promote walking to reduce the reliance on automobile travel by providing more attractive and pedestrian-friendly sidewalks, as well as adding pedestrian signalizations, street trees, and pedestrian-oriented design features. South Airport Boulevard south of the Project Site, West Century Boulevard, West 96th Street, and South Aviation Boulevard within the Study Area are designated as part of the PED.

Per the City's Los Angeles Safe Streets for All Initiative (Ordinance No. 188198) adopted in April 2024, should the City make any improvement to a street segment of at least 0.125 miles 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 the State CEQA Guidelines Appendix G (Appendix G), 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;*

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

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

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

This analysis relies on the Appendix G Thresholds above. The methodology and base assumptions used in this analysis were established by LADOT as set forth in the TAG and MOU.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency 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 Assessment 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 Assessment 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 I.1 of this Draft EIR, uses the latest version of the TAG (i.e., August 2022).

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

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 program plans, ordinances, and policies identified in Subsection 2.a., Regulatory Framework, above.

In accordance with the TAG, a project that generally conforms with and does not obstruct, the City's development policies and standards would generally be considered consistent 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 related to transportation.¹⁵ Furthermore, under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the 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 were adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

¹⁵ City of Los Angeles Department of Transportation, *Transportation Assessment Guidelines*, page 2-2 August 2022.

(3) Vehicle Miles Traveled

(a) VMT Screening Criteria

The TAG defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. Daily vehicle trips and VMT are calculated using the City's VMT Calculator Version 1.5 (VMT Calculator),¹⁶ as detailed in City of Los Angeles VMT Calculator Documentation.¹⁷ 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.

Section 2.2.2 of the TAG provides definitive guidance and direction regarding VMT screening criteria and analysis requirements for development projects, including land uses categorized as office and industrial. Projects that require a discretionary action but answer no to either of the two following questions do not require further analysis, and a "no impact" determination can be made:

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

(b) LADOT's VMT Calculator Assumptions

The number of daily vehicle trips expected to be generated by the Project was estimated using the rate published for the general light industrial and general office building land uses in the VMT Calculator.

To provide a conservative analysis, the fleet mix assumptions from the South Coast Air Quality Management District's *Warehouse Truck Trip Study Data Results and Usage* (July 2014) were applied to the daily trip estimates for the general light industrial land use to estimate the number of Project generated passenger vehicle and truck trips. The industrial-related passenger vehicle and truck trips were then converted to passenger-car equivalence (PCE) trips by applying PCE factors based on the number of axles, which were then input into the VMT Calculator as a custom land use input.

Daily trips generated by the existing rental car facility were estimated based on empirical studies conducted at the Project Site.

¹⁶ Los Angeles Department of Transportation, *City of Los Angeles VMT Calculator, Version 1.5, October 2024*.

¹⁷ Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, May 2020*.

The Project land use program was evaluated using LADOT's VMT Calculator based on the screening criteria included in section 2.2.2 of the TAG.

(c) Transportation Demand Management

The VMT Calculator also measures the reduction in VMT resulting from a project's incorporation of TDM measures and strategies as regulatory compliance (per Section 12.26 G of the LAMC), project design features, or mitigation measures. The following seven categories of TDM measures and/or strategies are included in the VMT Calculator:

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

TDM strategies and measures 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 their report, *Quantifying Greenhouse Gas Mitigation Measures*.¹⁸ Regardless of the VMT calculation for the Project, implementation of TDM measures are required by the TDM Ordinance (LAMC 12.26G).

(4) Hazardous Geometric Design Features

(a) Geometric Design Feature and Incompatible Uses

TAG Threshold T-3 requires that a project undergo further evaluation if it proposes new driveways or new vehicle access points to the property from the public ROW or modifications along the public ROW (i.e., street dedications). Project access plans were reviewed to determine if the Project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts, with consideration of the following factors:

¹⁸ *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

1. The relative amount of pedestrian activity at project access points;
2. Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site and the visibility of cars to pedestrians and bicyclists;
3. The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization;
4. The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts;
5. The project location, or project-related changes to the public ROW, relative to proximity to the HIN or a Safe Routes to School program area; and
6. Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

(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.

c. Project Design Features

The Project would implement the following project design feature related to transportation:

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. The Construction Management Plan would formalize how construction will be carried out and identify specific actions that will be required to reduce the effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to the Project Site, to ensure traffic safety on the public ROW.
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate.
- Temporary traffic control (e.g., flag persons) during all construction activities adjacent to the public ROW to improve traffic flow on public roadways.
- Scheduling of construction-related haul trips to occur outside of commuter peak hours to the extent feasible.
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries, to the extent feasible.

Project Design Feature TR-PDF-2: Under Option 1, the existing traffic signal at the northwestern corner of the Project Site on Interceptor Street would be modified to incorporate the Project driveway to limit potential impediments to traffic flow from trucks exiting the Project Site.

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 have been assessed for the Project: Mobility Plan 2035; Plan for a Healthy Los Angeles; Westchester–Playa del Rey Community Plan; Coastal Transportation Corridor Specific Plan; LAMC; LADOT Vision Zero; and Citywide Design Guidelines. The Project’s potential to conflict with these programs, plans, ordinances, and policies, and with SCAG’s 2024–2050 RTP/SCS, is analyzed below.

(a) Mobility Plan 2035

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

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. Access for All Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility standards will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

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-2 on page IV.I-32.

**Table IV.I-2
Project Consistency with Mobility Plan 2035**

Policy ^a	Analysis of Project Consistency
Chapter 1: Safety First	
<u>Policy 1.1 Roadway User Vulnerability</u> 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. The Project would provide pedestrian access at the grade level and unobstructed from view at the public ROW via several access points along the perimeter of the Project Site. 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. Overall, the physical changes in the public ROW would not degrade but prioritize the safety and experience of the most vulnerable roadway users. Therefore, the Project would not conflict with Policy 1.1.
<u>Policy 1.2 Complete Streets</u> 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. Specifically, the Project would comply with all applicable design element requirements, including those related to proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design, which would improve safety, visibility, mobility, and accessibility to reduce, if not totally avoid, any effects to the safety and mobility of all users on-site and on the public ROWs. The Project's streetscape improvements would enhance the pedestrian experience with new street trees and shrubs along the Project frontages. Therefore, the Project would not conflict with Policy 1.2.
<u>Policy 1.6 Multi-Modal Detour Facilities</u> Design detour facilities to provide safe passage for all modes of travel.	No Conflict. In accordance with Project Design Feature TR-PDF-1, the Project would prepare a Construction Traffic Management Plan that would include any necessary detour routes for all applicable travel modes, including walking, bicycle, and transit, and away from any impediments to the public ROW. Therefore, the Project would not conflict with Policy 1.6.
Chapter 2: World Class Infrastructure	
<u>Policy 2.1 Adaptive Reuse of Streets</u> Design, Plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands. <u>Policy 2.2 Complete Streets Design Guide</u> Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.	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. The Project would conform to all design element requirements which may affect public right-of-way, including proper driveway alignment, sidewalk widths to the extent feasible, improved lighting elements, and landscaping design that would not hinder sight

Table IV.I-2 (Continued)
Project Consistency with Mobility Plan 2035

Policy ^a	Analysis of Project Consistency
	distance, mobility, or accessibility. Specifically, the proposed driveways along Airport Boulevard under both options would intersect with the existing protected bike lane. However, the Project would ensure that the driveway is constructed in compliance with applicable LADOT requirements regarding site access and would provide sufficient visibility between drivers, cyclists, and pedestrians. Therefore, the Project would not conflict with Policy 2.1 or 2.2.
<u>Policy 2.3 Pedestrian Infrastructure</u> 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 would enhance pedestrian access within and around the Project Site by providing new landscaping and Project Site access via a pedestrian entrance and walkway along Airport Boulevard and West Arbor Vitae Street under Option 1, and pedestrian entrances and walkways along Airport Boulevard and West Arbor Vitae Street within Option 2. The Project would provide separate pedestrian entrances from the vehicular driveways to the Project Site to reduce vehicular-pedestrian conflicts to ensure pedestrian safety. All driveways would be designed to provide an adequate pedestrian refuge area between the driveways to ensure high-quality pedestrian access and create a safe and comfortable walking environment. Therefore, the Project would not conflict with Policy 2.3.
<u>Policy 2.4 Neighborhood Enhanced Network</u> 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 proposes improvements to the Project Site frontages to meet the long-term mobility needs identified in the Mobility Plan. West Arbor Vitae Street is part of the NEN. Although the Project would provide vehicular access from this street, the Project would result in an overall net reduction of trips to and from the Project Site as demonstrated in the analysis under Threshold (b) below and would not increase traffic along this street. As such, the Project would meet the long-term mobility needs identified in the Mobility Plan. Therefore, the Project would not conflict with Policy 2.4.
<u>Policy 2.5 Transit Network</u> 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. No Streets within the Study Area are designated as part of the TEN. The Project would be developed within the boundaries of the Project Site and does not propose any improvements to nearby bus services. As such, the Project would not interfere with existing or future transit services. Therefore, the Project would not conflict with Policy 2.5.
<u>Policy 2.6 Bicycle Networks</u> Provide safe, convenient, and comfortable local and regional bicycling facilities for	No Conflict. While this policy applies to the City and not development projects, the Project would not preclude future improvements to existing and future bicycle infrastructure or operations that would conflict with plans under development by Metro and/or LADOT. West Arbor Vitae Street adjacent to

Table IV.I-2 (Continued)
Project Consistency with Mobility Plan 2035

Policy ^a	Analysis of Project Consistency
people of all types and abilities. (includes scooters, skateboards, rollerblades, etc.)	the Project Site is designated as part of the BEN. The Project would provide vehicular access from West Arbor Vitae Street; however, the net reduction of Project trips over existing uses at the Project Site would reduce traffic along this street. Additionally, the Project would provide long-term and short-term bicycle parking spaces per the LAMC. Therefore, the Project would not conflict with Policy 2.6.
<u>Policy 2.9 Multiple Networks</u> Consider the role of each mode enhanced network when designing a street that included multiple modes.	No Conflict. As detailed in the discussion of Policy 2.6 above, West Arbor Vitae Street adjacent to the Project Site is identified as part of the BEN. The Project would include a pedestrian and bicycle entrance along this street and would also improve the adjacent pedestrian sidewalk to enhance the pedestrian experience and provide safe access to nearby transit stops. Therefore, the Project would not conflict with Policy 2.9.
Chapter 3: Access for All Angelenos	
<u>Policy 3.1 Access for All</u> 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. The Project would encourage multi-modal transportation alternatives through proximity to a variety of high-quality transit options as well as the provision of bicycle facilities. The Project would encourage the use of transit by developing warehouse uses located within 0.5 miles of a major transit stop at South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines. Additionally, the Project would support employees and visitors who choose to travel by automobile by incorporating new driveways along South Airport Boulevard and West Arbor Vitae Street and providing sufficient parking to accommodate the anticipated demand. Furthermore, security gates and drive aisles would be placed and designed in accordance with City standards to maximize queue capacity and operational efficiency based on the anticipated demand. Therefore, the Project would not conflict with Policy 3.1.
<u>Policy 3.2 People with Disabilities</u> Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	No Conflict. The Project would be designed to meet all ADA requirements, including providing adequate access to pedestrian amenities at adjacent and nearby intersections by meeting specific ADA curb ramp standards and providing the minimum sidewalk width along the Project Site's street frontages. Therefore, the Project would not conflict with Policy 3.2.
<u>Policy 3.3 Land Use Access and Mix</u> 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 develop 355,390 square feet of warehouse floor area and 80,000 square feet of associated office floor area under Option 1, and 320,056 square feet of warehouse floor area and 90,000 square feet of associated office floor area under Option 2. The Project Site is located within 0.5 miles of a major transit stop at the intersection of South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines that would minimize vehicular trips and enhance the proximity and

Table IV.I-2 (Continued)
Project Consistency with Mobility Plan 2035

Policy ^a	Analysis of Project Consistency
	convenience of employees to neighborhoods and commercial areas. Therefore, the Project would not conflict with Policy 3.3.
<u>Policy 3.4 Transit Services</u> Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.	No Conflict. The Project Site is served by multiple Metro, Big Blue Bus, and Culver City Bus lines with service to a major transit stop within 0.5 miles of the Project Site at the intersection of South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines. Accordingly, the Project would provide employees and visitors access to affordable, efficient, convenient, and attractive transit services. Therefore, the Project would not conflict with Policy 3.4.
<u>Policy 3.5 Multi-Modal Features</u> Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	No Conflict. The Project would support “first-mile, last-mile solutions” by developing warehouse uses in proximity to a high-traffic commercial corridor that is well-served by a variety of public transit options. The Project would also provide bicycle parking for employees and visitors. The Project’s location near numerous public transit services would encourage the use of alternative mobility modes. Therefore, the Project would not conflict with Policy 3.5.
<u>Policy 3.8 Bicycle Parking</u> Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	No Conflict. Option 1 would include 44 short-term bicycle parking spaces and 52 long-term bicycle parking spaces for a total of 96 bicycle parking spaces. Option 2 would provide 41 short-term bicycle parking spaces and 50 long-term bicycle parking spaces for a total of 91 bicycle parking spaces. The proposed driveways along Airport Boulevard under both options would intersect with the existing protected bike lane. However, the Project would ensure that the driveway is constructed to provide sufficient visibility between drivers, cyclists, and pedestrians. Therefore, the Project would not conflict with Policy 3.8.
Chapter 4: Collaboration, Communication, & Informed Choices	
<u>Policy 4.8 Transportation Demand Management Strategies</u> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	No Conflict. The Project’s TDM measures as required by the existing TDM Ordinance (LAMC Section 12.26 G) would include bicycle parking in accordance with LAMC Section 12.21 A.16, displaying local transit information to promote and market alternative transportation modes and choices, designated carpool parking spaces as well as loading and unloading areas, and safe pedestrian and bicycle connections to off-site facilities. The TDM measures would help to reduce dependence on single-occupancy vehicles. Therefore, the Project would not conflict with Policy 4.8.
<u>Policy 4.13 Parking and Land Use Management</u> Balance on-street and off-street parking supply with other transportation and land use objectives.	No Conflict. The Project would provide sufficient off-street parking to meet the needs of employees and visitors for both vehicles and truck trailers within the Project Site. The Project is a discretionary development project that is within 0.5 miles of a major transit stop located at the LAX/Metro Transit Center, which serves the Metro C and K Lines. Further, the Project would provide surface parking, with 274 vehicle spaces and

Table IV.I-2 (Continued)
Project Consistency with Mobility Plan 2035

Policy^a	Analysis of Project Consistency
	90 trailer parking spaces under Option 1, and 369 vehicle parking spaces, inclusive of 20 tandem spaces, under Option 2. Therefore, the Project would not conflict with Policy 4.13.
Chapter 5: Clean Environments & Healthy Communities	
<u>Policy 5.1 Sustainable Transportation</u> 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 encourage sustainable transportation through the provision of bicycle parking for employees and visitors, which would promote active transportation modes such as biking and walking. Furthermore, the Project Site is well-served by a variety of public transit options as previously described, thereby providing Project employees and visitors with public transportation alternatives. Therefore, the Project would not conflict with Policy 5.1.
<u>Policy 5.2 Vehicle Miles Traveled (VMT)</u> Support ways to reduce vehicle miles traveled (VMT) per capita.	No Conflict. It is estimated that the Project would generate lower work VMT per employee than the average for the area, as demonstrated below in the analysis of Threshold (b). Further, the Project would implement TDM measures as required by the TDM Ordinance, which would reduce VMT per capita. Therefore, the Project would not conflict with Policy 5.2.
<u>Policy 5.4 Clean Fuels and Vehicles</u> Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.	No Conflict. The Project would provide preferential parking for carpools and low emitting and zero emission vehicles and would comply with the CALGreen Code and City EV charging requirements. Additionally, trucks on-site would be required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated emissions. Further, Project Design Feature AIR-PDF-2, would include at least four tractor trailer parking stalls capable of supporting future electric vehicle supply equipment for Option 1 and six tractor trailer parking stalls capable of supporting future electric vehicle supply equipment for Option 2, and Project Design Feature AIR-PDF-4 would require electrical hookups for all loading bays to prevent unnecessary idling or use of auxiliary truck engine power to power climate control equipment. Therefore, the Project would not conflict with Policy 5.4.
^a Policies based on information provided in Mobility Plan 2035: An Element of the General Plan (Los Angeles Department of City Planning, January 2016). Source: Gibson Transportation Consulting, Eyestone Environmental, 2025.	

As discussed previously, the Mobility Plan identifies key corridors within the Study Area as components of various “mobility-enhanced networks.” Though no specific mobility-related improvements have been identified at this time and there is no schedule for

implementation, the mobility enhanced networks each represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. As discussed in Table IV.I-2 on page IV.I-32, the Project would not preclude the City from implementing Mobility Plan improvements in the Study Area.

With development of the Project, South Airport Boulevard and West Arbor Vitae Street along the frontages of the Project Site would provide improved pedestrian safety through enhanced lighting and landscaping. Specifically, the Project would include streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse buildings including integration of fencing and security walls with planting along the perimeter of the site. The Project would include new landscaping and maintenance of existing landscaping along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard, as well as in the interior of the Project Site. These perimeter area and Project Site improvements would also include lighting, bicycle parking, and wayfinding signage. These improvements would provide for a comfortable pedestrian network, thereby improving connections to the Project Site, transit facilities, and other pedestrian attractors in the area.

Under Option 1, vehicular access to the Project Site would be provided along the southern boundary on West Arbor Vitae Street and along the western boundary on South Airport Boulevard and Interceptor Street. Two emergency vehicle access (EVA) driveways would be located on the eastern portion of the Project Site on West Arbor Vitae Street and on Interceptor Street. Under Option 2, vehicular access to the Project Site would be provided via three driveways along West Arbor Vitae Street, and two driveways along South Airport Boulevard and Interceptor Street. An EVA driveway would be located on the eastern portion of the Project Site along West Arbor Vitae Street.

The proposed driveways along Airport Boulevard under both options would intersect with the existing protected bike lane. However, the Project would ensure that the driveway is constructed to provide sufficient visibility between drivers, cyclists, and pedestrians. In addition, the Project would provide short-term and long-term bicycle parking spaces in accordance with LAMC Section 12.21 A.16. These measures would promote active transportation modes such as biking and walking, thereby reducing the Project VMT compared to the average for the area. Furthermore, the Project Site is served by multiple Metro, Big Blue Bus, and Culver City Bus lines, including a major transit stop within 0.5 miles of the Project Site at the intersection of South Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines.

As detailed in Table IV.I-2 and summarized above, the Project would not conflict with the Mobility Plan.

(b) Plan for a Healthy Los Angeles

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table IV.I-3 on page IV.I-39. The Project supports initiatives to create transit-oriented developments by expanding employment opportunities and improving the jobs/housing balance in a designated TPA. The Project would enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Additionally, the Project would not displace any existing housing; rather, the Project would create local employment opportunities in the area and, as such, the levels of existing low-income housing would be preserved. Accordingly, the Project would create opportunities for existing residents to benefit from local revitalization efforts by creating local employment. Thus, the Project would not conflict with the policies of the Plan for a Healthy Los Angeles.

(c) Westchester–Playa del Rey Community Plan

A detailed analysis of the Project's consistency with the applicable transportation related policies of the Westchester–Playa del Rey Community Plan is provided in Table IV.I-4 on page IV.I-40. As discussed therein, the Project Site is served by multiple Metro, Big Blue Bus, and Culver City Bus lines with service to a major transit stop within 0.5 miles of the Project Site at the intersection of Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines. These transit services would provide employees and visitors to the Project Site with multiple transit route service opportunities. In addition, the Project would reduce the number of single-occupancy trips to the Project Site by providing bicycle parking and separate bicycle and pedestrian access to the Project Site, which would promote active transportation modes such as biking and walking to nearby bus and transit stops. Furthermore, pedestrian access to transit stops would be enhanced with additional landscaping and sidewalk improvements along South Airport Boulevard and West Arbor Vitae Street adjacent to the Project Site. Therefore, as detailed in Table IV.I-4, the Project promotes and encourages development consistent with the transportation-related policies and objectives of the Westchester–Playa del Rey Community Plan.

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

Policy^a	Analysis of Project Consistency
Chapter 1: Los Angeles, a Leader in Health and Equity	
Policy 1.5 Plan for Health Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	No Conflict. The Project supports initiatives to create transit-oriented developments by expanding employment opportunities and improving the jobs/housing balance in a designated TPA. Furthermore, the Project would enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Therefore, the Project would not conflict with Policy 1.5.
Policy 1.7 Displacement and Health Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.	No Conflict. The Project would develop 355,390 square feet of warehouse floor area and 80,000 square feet of associated office floor area under Option 1, and 320,056 square feet of warehouse floor area and 90,000 square feet of associated office floor area under Option 2. Since there is no existing housing on-site, the Project would not displace any existing housing; rather, the Project would create local employment opportunities in the area and, as such, the levels of existing low-income housing would be preserved. Accordingly, the Project would create opportunities for existing residents to benefit from local revitalization efforts by creating local employment. Therefore, the Project would not conflict with Policy 1.7.
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, especially for children, seniors and others susceptible to respiratory diseases.	No Conflict. The Project would result in a net reduction of VMT, as demonstrated below in the discussion of Threshold (b). VMT directly contributes to GHG emissions, so a reduced VMT per capita would also reduce GHG per capita. Therefore, the Project would not conflict with Policy 5.7.
^a Policies based on information provided in <i>Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan</i> (Los Angeles Department of City Planning, Updated November 2021). Source: Gibson Transportation Consulting, Inc., <i>Transportation Assessment for the 9000 Airport Boulevard Project, Los Angeles, California, October 2025. Refer to Appendix I.1 of this Draft EIR.</i>	

Table IV.I-4
Project Consistency With Westchester-Playa Del Rey Community Plan^a

Objective and Policies	Analysis of Project Consistency
Objective 14-1: Continue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Westchester-Playa Del Rey Community Plan Area.	No Conflict. While this policy applies to the City and not development projects, the Project would enhance pedestrian access to transit stops with additional landscaping and sidewalk improvements along South Airport Boulevard and West Arbor Vitae Street adjacent to the Project Site. The Project Site is served by multiple Metro, Big Blue Bus, and Culver City Bus lines with service to a major transit stop within 0.5 miles of the Project Site at the intersection of south Airport Boulevard and West Arbor Vitae Street/Westchester Parkway, as well as the LAX/Metro Transit Center Station, which serves the Metro C and K Lines. Therefore, the Project would not conflict with this objective.
Policy 15-1.4: Promote the development of transportation facilities and services that encourage higher transit ridership, increased vehicle occupancy, and improved pedestrian and bicycle access.	No Conflict. The Project would reduce the number of single-occupancy vehicle trips by implementing TDM measures as required by the TDM Ordinance. Furthermore, pedestrian access to transit stops would be enhanced with additional landscaping and sidewalk improvements along South Airport Boulevard and West Arbor Vitae Street adjacent to the Project Site, as well as providing separate bicycle and pedestrian access to the Project Site. Therefore, the Project would not conflict with this policy.
Policy 16-1.4: Support the provision of bicycle facilities in all new development.	No Conflict. Option 1 would provide a total of 96 bicycle parking spaces and Option 2 would provide a total of 91 bicycle parking spaces. Therefore, the Project would not conflict with this policy.
Objective 16-2: To promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.	No Conflict. The Project would include either two or four pedestrian entrances along South Airport Boulevard and West Arbor Vitae Street, depending on the option, with designated walkways to the proposed buildings on-site to promote pedestrian safety. The Project would also provide bicycle parking and entrances for employees and visitors, which would promote active transportation modes such as biking and walking to nearby bus and transit stops. Therefore, the Project would not conflict with this objective.
Policy 17-1.1: Minimize the number of ingress and egress points to and from all Arterials in the Westchester-Playa Del Rey Community Plan Area.	No Conflict. Under Option 1, vehicular access to the Project Site would be provided along the southern boundary on West Arbor Vitae Street and along the western boundary on South Airport Boulevard and Interceptor Street. Two EVA driveways would be located on the eastern portion of the Project Site on West Arbor Vitae Street and on Interceptor Street. Under Option 2, vehicular access to the Project Site would be provided via three driveways along West Arbor Vitae Street, and two driveways along South Airport Boulevard and Interceptor Street. An EVA driveway would be located on the eastern portion of the Project

Table IV.I-4 (Continued)
Project Consistency With Westchester-Playa Del Rey Community Plan

Objective and Policies	Analysis of Project Consistency
	Site along West Arbor Vitae Street. The proposed ingress and egress to the Project Site would accommodate traffic generated by the Project. Further, the proposed driveways along South Airport Boulevard under both options would intersect with the existing protected bike lane. However, the Project would ensure that the driveway is constructed to provide sufficient visibility between drivers, cyclists, and pedestrians. Therefore, the Project would not conflict with this policy.
Policy 17-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.	No Conflict. The Project is a discretionary development project that is within 0.5 miles of a major transit stop. Further, the Project would include surface parking, with 274 vehicle spaces and 90 trailer parking spaces under Option 1, and 369 vehicle parking spaces, inclusive of 20 tandem spaces, under Option 2. Therefore, the Project would not conflict with this policy.
^a Additional Community Plan objectives and policies that are applicable to the Project are discussed in Section IV.G, Land Use and Planning, and Table 3 of Appendix G.1 of this Draft EIR. Source: Gibson Transportation Consulting, Inc., Eyestone Environmental LLC, 2025.	

(c) Coastal Transportation Corridor Specific Plan

The City's Coastal Transportation Corridor Specific Plan establishes a transportation mitigation program that reprioritizes transportation improvements, reducing VMT, improving mobility options, and enhancing mobility and connectivity along key transportation corridors. The Project would generate a net reduction in VMT and would incorporate elements to promote the use of alternative modes of transportation, including developing employment opportunities within a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA), and a HQTC as well as enhancing the pedestrian experience along the streetscape with extensive landscaping and new trees along all Project frontages. Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage to enhance the experience and safety for all users. Furthermore, the Project would not preclude the City from incorporating any transportation improvements identified in the Coastal Transportation Corridor Specific Plan. Therefore, the Project would not conflict with the Coastal Transportation Corridor Specific Plan.

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

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. In accordance with the requirements of the LAMC, the Project would provide 44 short-term and 52 long-term for a total of 96 bicycle parking spaces under Option 1, and

41 short-term and 50 long-term for a total of 91 bicycle parking spaces under Option 2. Therefore, the Project would not conflict with LAMC Section 12.21 A.16.

(e) LAMC Section 12.26 G (TDM Ordinance)

LAMC Section 12.26 G, the TDM Ordinance, establishes TDM requirements for new non-residential projects, in addition to non-residential components of mixed-use projects, with at least 25,000 square feet of non-residential floor area. The Project would include more than 25,000 square feet of non-residential floor area and, therefore, would be subject to the requirements of the TDM Ordinance, which include but are not limited to: bicycle parking in accordance with LAMC 12.21 A.16 (described above), displaying local transit information to promote and market alternative transportation modes and choices, designated carpool parking spaces as well as loading and unloading areas, and safe pedestrian and bicycle connections to off-site facilities. Therefore, the Project would be consistent with the TDM Ordinance.

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

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The City has identified a number of streets as part of the HIN where City projects will be targeted. As noted above, the Project Site is not located along any streets identified as part of the HIN. Nonetheless, the Project improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Thus, the Project would not conflict with Vision Zero.

(g) Citywide Design Guidelines

A detailed discussion of how the Project would promote each of the Citywide Design Guidelines is provided in Section IV.G, Land Use and Planning, of this Draft EIR. As detailed therein, the Project would not conflict with the applicable Citywide Design Guidelines related to transportation.

(h) SCAG 2024–2050 RTP/SCS

As discussed in detail in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would not conflict with the 2024–2050 SCAG RTP/SCS policies related to encouraging pedestrian activity and reducing VMT. As indicated therein, the Project would improve mobility and accessibility and encourage transit use, reduce VMT and GHG emissions on site per capita by intensifying urban density within a SCAG-designated PDA

(i.e., NMA, Livable Corridor and TPA) and an HQTC^{19,20} in close proximity to a high-traffic commercial corridor that is well-served by a variety of public transit options. Further the Project would provide pedestrian and bicycle improvements, EV charging stations, implement TDM measures, and support healthy and equitable communities by encouraging walking and bicycling, facilitate a reduction of VMT and air pollution, and provide public right of way improvements (i.e., new street trees, lighting, bicycle parking and supporting amenities, etc.).

As the Project would be located within a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA) and a HQTC in an area well-served by Metro and various local bus lines, it would contribute to the productivity and use of the regional transportation system. The Project would provide employment and local-serving uses near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region while at the same time reducing VMT and GHG emissions on site per capita.

Based on the above, 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, and impacts would thus be less than significant.

(2) Mitigation Measures

The Project would not conflict with the applicable program plans, ordinances, and policies addressing the circulation system. Therefore, impacts would be less than significant, and no mitigation measures are required.

¹⁹ The 2020–2045 RTP/SCS mapped the Project as being located within a SCAG-designated HQTA. The 2024–2050 RTP/SCS does not use the HQTA designation as part of its Priority Development Areas (previously referred to as Priority Growth Areas) and instead uses a designation referred to as Livable Corridors.

²⁰ SCAG, 2024–2050 RTP/SCS, April 2024, Map 3.4 Priority Development Areas.

(3) Level of Significance After Mitigation

Project-level impacts related to applicable programs, plans, ordinances, and policies 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 in the Transportation Assessment, Section 2.2.2 of the TAG provides definitive guidance and direction regarding VMT screening criteria and analysis requirements for development projects, including land uses categorized as industrial and office. Projects that require a discretionary action but answer no to either of the two following questions do not require further analysis, and a “no impact” determination can be made:

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

Based on the screening criteria identified above, the Project land use program was evaluated using LADOT’s VMT Calculator. As shown in the MOU included as Attachment A of the Transportation Assessment and as indicated in Table IV.I-5 on page IV.I-45, the Project is anticipated to result in an overall net decrease of 1,500 daily vehicle trips and a net decrease of 9,118 daily VMT for Option 1. For Option 2, the Project is anticipated to result in an overall net decrease of 1,712 daily vehicle trips and a net decrease of 10,737 daily VMT. Therefore, neither Option 1 or Option 2 of the Project would meet the thresholds of 250 daily trips or a net increase in daily VMT that would require further VMT analysis. Therefore, no impacts would occur.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and no impacts would occur.

(2) Mitigation Measures

No Project-level impacts with regard to VMT would occur. Therefore, no mitigation measures are required.

**Table IV.I-5
VMT Analysis Summary**

	Option 1	Option 2
Land Use		
Industrial	355,390 sf	320,056 sf
Office	80,000, sf	90,000 sf
VMT Screening Analysis		
Net Daily Trips	-1,500	-1,712
Net Daily VMT	-9,118	-10,737
<i>sf = square feet</i> <i>N/A = not applicable</i> <i>Source: Gibson Transportation Consulting, Inc., Transportation Assessment for the 9000 Airport Boulevard Project, Los Angeles, California, October 2025. Refer to Appendix I.1 of this Draft EIR.</i>		

(3) Level of Significance After Mitigation

No Project-level impacts with regard to VMT would occur. Therefore, no mitigation measures were required or included.

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

As previously discussed, for Option 1, vehicular access to the Project Site would be provided along the southern boundary on West Arbor Vitae Street and along the western boundary on South Airport Boulevard and Interceptor Street. Option 1 would include Project Design Feature TR-PDF-2, which states that the existing traffic signal at the northwestern corner of the Project Site on Interceptor Street would be modified to incorporate the Project driveway to limit potential impediments to traffic flow from trucks exiting the Project Site. For Option 2, vehicular access to the Project Site would be provided via three driveways along West Arbor Vitae Street, and two driveways along South Airport Boulevard and Interceptor Street. The proposed driveways along South Airport Boulevard would intersect with the existing protected bike lane. The proposed driveways under both Options would provide adequate sight distance for vehicles entering and departing the Project Site, as they would be placed perpendicular to roadways and no unusual or new obstacles would be presented in the design that would be considered hazardous. Additionally, the vehicular driveways

would intersect with Interceptor Street, South Airport Boulevard and West Arbor Vitae at a right angle to maximize sight distance.

A queuing model was developed based on a Poisson distribution of the estimated vehicular arrivals per minute to confirm that the driveways and the proposed truck gate locations and queuing areas would provide adequate capacity for inbound traffic.²¹ For the purposes of the analysis, it was conservatively assumed that each truck entering the Project Site would have a processing time of 30 seconds at the truck gates. Thus, one-lane gates would process two trucks per minute and two-lane gates would process four trucks per minute. Passenger vehicles entering the Project Site driveways would have no gate controls when accessing the vehicle parking areas and, therefore, would have a processing time of 3.6 seconds.

For Option 1, the maximum queue at any of the Project driveways would not exceed one truck length. For Option 2, the maximum queue at the Project driveways would not exceed two vehicle/truck lengths. All driveways that serve truck access would have sufficient capacity to accommodate the estimated inbound and outbound traffic volume, and, therefore, no hazards would occur related to operation of the driveway. In the event, should atypical circumstances result in the need to alleviate queuing at the driveways, the ability of the internal circulation area under both Project options would be sufficient to temporarily accommodate queuing on-site. Therefore, all Project driveways would have sufficient capacity to accommodate the estimated inbound and outbound traffic volume and, therefore, no hazards would occur related to operation of the driveway. The proposed driveways would be designed in compliance with applicable LADOT requirements regarding site access and would not impede access to and from the Project Site. **Therefore, the Project would not substantially increase hazards due to a geometric design feature, and impacts would be less than significant.**

(b) Freeway Safety Analysis

As discussed above in the Methodology subsection, the City's Freeway Guidance requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queueing impacts. As shown in Table IV.I-6 on page IV.I-47, the Project would add fewer than 25 trips to the freeway off-ramps analyzed in both the morning and afternoon peak hours.

If the 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. The Project would add fewer than

²¹ *The Poisson distribution is a discrete probability distribution that expresses the probability of a given number of events occurring in a fixed interval of time or space if these events occur with a known average rate and independently of the time since the last event.*

**Table IV.I-6
Project Trip Volumes Added to Off-Ramps**

Off-Ramp Location	Project-Added Trip Volumes Option 1		Project-Added Trip Volumes Option 2	
	A.M. Peak Hour	P.M. Peak Hour	A.M. Peak Hour	P.M. Peak Hour
I-405 Northbound^a				
Off-Ramp to La Tijera Blvd.	0	0	0	0
Off-Ramp to Manchester Blvd.	19	(1)	17	(2)
Off-Ramp to Century Blvd.	9	0	9	(1)
I-405 Southbound^b				
Off-Ramp to La Tijera Blvd.	9	0	9	(1)
Off-Ramp to Manchester Blvd.	19	(1)	17	(2)
Off-Ramp to Century Blvd.	9	0	9	(1)
I-105 Eastbound^c				
Off-Ramp to La Cienega Blvd./ Aviation Blvd.	9	0	9	(1)
Off-Ramp to Nash St.	9	0	9	(1)
Off-Ramp to Sepulveda Blvd.	9	0	9	(1)
I-105 Westbound^d				
Off-Ramp to Imperial Highway	0	0	0	0
^a 15% of incoming trips were assumed to travel northbound on the I-405 to the Project Site via off-ramps to Manchester Boulevard and Century Boulevard. ^b 20% of incoming trips were assumed to travel southbound on the I-405 to the Project Site via off-ramps to La Tijera Boulevard, Manchester Boulevard, and Century Boulevard. ^c 15% of incoming trips were assumed to travel westbound on the I-105 to the Project Site via La Cienega Boulevard/Aviation Boulevard, Nash Street, and Sepulveda Boulevard. ^d 0% of incoming trips were assumed to travel eastbound on the I-105 to the Project Site. Source: Gibson Transportation Consulting, 2025.				

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. As a result, no further Caltrans freeway off-ramp queuing analysis is required. Furthermore, the Project would not result in a significant safety impact, and no corrective measures at any freeway off-ramps would be required. **Thus, impacts related to hazardous geometric design features associated with freeway safety would be less than significant.**

(2) Mitigation Measures

Project-level impacts with regard to hazardous geometric design features and incompatible land 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 and incompatible land 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 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 street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, the Project would implement a Construction Management Plan pursuant to Project Design Feature TR-PDF-1, which would ensure adequate circulation and emergency access. With regard to 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, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. The Project would also include an emergency vehicle access driveway, which would be located in the eastern portion of the Project Site along West Arbor Vitae Street. **Therefore, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.**

e. Cumulative Impacts

Pursuant to the TAG, a list of the four related projects located within 0.5 miles of the Project Site is provided in Table III-1 in Section III, Environmental Setting, of this Draft EIR. The related projects comprise a variety of uses, including residential, commercial, and industrial uses, as well as mixed-use developments incorporating some or all of these elements. Although the buildout years of many 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., 2027) for purposes of the traffic analysis.

(1) Impact Analysis

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

The Project would specifically support key policies (such as intensifying urban density within a SCAG-designated PDA (i.e., NMA, Livable Corridor and TPA), and an HQTC in proximity to transit and enhancing pedestrian infrastructure), while many of the nearby related projects would neither support nor interfere with such policies. In addition, each of the related projects would be separately reviewed and approved by the City, including a check for their consistency with applicable transportation-related programs, plans, policies and ordinances. Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would not result in significant inconsistencies with applicable transportation program plans, policies and ordinances. **Therefore, the Project's cumulative impacts with respect to conflicts with transportation-related programs, plans, policies, and ordinances would be less than significant.**

(b) Vehicle Miles Traveled

As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating that there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. As described under Threshold (b) of the Project-level analysis above, the Project would not result in a significant VMT impact. In addition, the Project would be designed to further reduce single occupancy trips to by implementing TDM measures as required by the existing TDM Ordinance. **Therefore, the Project's cumulative impacts with respect to VMT would be less than significant, and the Project's VMT impacts would not be cumulatively considerable.**

(c) Hazardous Geometric Design Features

According to the TAG, a project could contribute to a significant cumulative impact with respect to hazardous geometric design features if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts.

As shown in Table III-1 in Section III, Environmental Setting, of this Draft EIR, none of the four related projects are located along the same block as the Project Site. As such, there are no identified related projects proposed with access points along the same block of the Project. Therefore, the Project and the related projects would not result in cumulative impacts that would substantially increase hazards due to geometric design features,

including safety, operational, or capacity impacts, or incompatible uses. 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 hour. 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, 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. Furthermore, 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. **Therefore, cumulative impacts with respect to hazardous geometric design features would be less than significant, and the Project's impacts related to hazardous design features would not be cumulatively considerable.**

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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