IV. Environmental Impact Analysis
K. Transportation

1. Introduction

This section analyzes the Project's potential impacts on transportation. The analysis is primarily based on the *Transportation Assessment for the Paseo Marina Project* (Transportation Assessment) prepared for the Project, and included in its entirety in Appendix J of this Recirculated Draft EIR.[1]

The analysis of Vehicle Miles Traveled (VMT) is based on the Memoranda of Understanding (MOUs) for Option A and Option B. The MOUs were prepared pursuant to LADOT's Transportation Assessment Guidelines (July 2020), which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA guidelines from the State of California. LADOT's Transportation Assessment Guidelines require transportation impacts to be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was approved by LADOT on August 26, 2021. A copy of LADOT's Assessment Letter is included in Appendix J of this Recirculated Draft EIR. A copy of LADOT's Assessment Letter for the Updated VMT Analysis for Option B of the Project is also included in Appendix J of this Recirculated 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. As described below, these plans, guidelines, and laws include:

- Americans with Disabilities Act of 1990;

[1] *Linscott Law & Greenspan, Transportation Assessment—Paseo Marina Project, April 29, 2021, subsequently revised Transportation Assessment dated July 2021, and the Updated Vehicle Miles Traveled Analysis for the Paseo Marina Project (Option B), October 26, 2022, included in Appendix J of this Recirculated Draft EIR.*

- Complete Streets Act;
- Assembly Bill 32 and Senate Bill 375;
- California Vehicle Code;
- Senate Bill 743;
- CEQA Guidelines Section 15064.3;
- Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility Plan 2035;
- Palms-Mar Vista-Del Rey Community Plan;
- City of Los Angeles Coastal Transportation Corridor Specific Plan;
- Los Angeles Municipal Code;
- LADOT Transportation Assessment Guidelines;
- LADOT Manual of Policies and Procedures Section 321;
- LADOT Vision Zero;
- Interim Guidance for Freeway Safety;
- Citywide Design Guidelines; and
- Plan for A Healthy Los Angeles.

(1) Federal

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

(a) Complete Streets Act

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

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

(b) Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (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 (California ARB) is coordinating the response to comply with AB 32.

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

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every 8 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 preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they: (1) are at least 50 percent residential; (2) meet density requirements; and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

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

(c) California Vehicle Code

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

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

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

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

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[2] or a stop along an existing high-quality transit corridor[3] 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

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[2] *"Major transit stop" is defined in Public Resources Code (PRC) Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.*

[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.*

City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the current version of the TAG.

(3) Regional

(a) Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020–2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016–2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for 4 percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significantly higher employment density than surrounding areas, which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low- to moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways.

The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020–2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a 5-percent reduction in VMT per capita, a 9-percent reduction in vehicle hours traveled, and a 2-percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[4] 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,

[4] *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.*

bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

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

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

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with

striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.

- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.

- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

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

The Project Site is located within the Palms-Mar Vista-Del Rey community plan area. The Community Plan identifies several transportation-related goals, objectives and policies, as listed below, as well as a Transportation Improvement and Mitigation Plan, addressing transit improvements, transportation demand management (TDM) strategies, residential neighborhood protection, transportation system management strategies, and highway infrastructure improvements within the Community Plan Area. The Palms–Mar Vista–Del Rey Community Plan is one of the four Westside community plans currently being updated with the City of Los Angeles Department of City Planning. The existing Community Plan includes the following transportation and circulation objectives that are applicable to the Project:

- Objective 10-2: To Increase the work trips and non-work trips made on public transit;

- Objective 11-1: To Pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips;

- Policy 11-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile, such as carpools, vanpools, buses, flex time, bicycles, and walking;

- Policy 11-1.2: Encourage the use of multiple-occupancy vehicle programs for shopping and other activities to reduce midday traffic;

- Objective 12-1: To promote an adequate system of bikeways for commuter, school, and recreational use;

- Policy 12-1.4: Encourage the provision of changing rooms, showers, and bicycle storage at new and existing non-residential developments and public places;

- Objective 12-2: To promote pedestrian oriented mobility and utilization of the bicycle for commuter, school, recreational use, economic activity, and access to transit facilities;

- Objective 13-1: To provide parking in appropriate locations in accordance with Citywide standards and community needs;

- Policy 13-1.1: Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials;

- Policy 13-1.2: New parking lots and garages shall be developed in accordance with design standards.

(c) City of Los Angeles Coastal Transportation Corridor Specific Plan

The City adopted the Coastal Transportation Corridor Specific Plan to establish a transportation mitigation program for all lots located in whole or in part within the Specific Plan Area. The regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of Chapter I 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 except as specifically provided herein. Provisions within the Specific Plan supersede the applicable regulations of the LAMC unless overridden by the LAMC or other adopted ordinance.[5] The Specific Plan is intended to adopt a transportation impact mitigation program in the Specific Plan area to achieve the purposes of the Specific Plan. An analysis of the Project's consistency with the Specific Plan is provided in Section IV.H, Land Use and Planning, and in the Transportation Assessment included in Appendix J of this Recirculated Draft EIR.

[5] *City of Los Angeles, Coastal Transportation Corridor Specific Plan, effective September 22, 1993, amended June 28, 2019.*

(d) Los Angeles Municipal Code

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

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

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

LAMC Section 12.26 J provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM 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. 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.

(e) LADOT Transportation Assessment Guidelines

On July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model, and transportation impact thresholds based on VMT pursuant to CEQA Guidelines Section 15064.3 and the 2019 CEQA updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[6]

(f) 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.

(g) 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 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

[6] *Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2000.*

(h) Interim Guidance for Freeway Safety

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

(i) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles 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.

(j) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[7] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Conditions

(1) Study Area

The Project's transportation analysis study area (study area) encompasses a geographic area of up to 0.75 mile from the Project Site generally bounded by Washington Boulevard in the north and west, the Marina del Rey harbor in the south, and Culver Boulevard in the west. The study area for the Project was established in consultation with LADOT as part of the MOU process, based on the City's TAG, the proposed Project description and location, and the characteristics of the surrounding transportation system.

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

The Project location, area streets, and the study area are shown in Figure IV.K-1 on page IV.K-15. The existing transportation facilities (e.g., traffic signals, stop signs, crosswalks, bus stops, etc.) in the vicinity are identified in Figure IV.K-2 on page IV.K-16.

(2) Roadway System

The existing street system in the study area, the boundaries of which are described above, consists of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access.

(a) Streets

Immediate access to the Project Site is provided by Maxella Avenue and Glencoe Avenue. Listed below are the primary streets that provide regional and local access to the Project Site.

- Walgrove Avenue—Walgrove Avenue is a north-south oriented roadway located northeast of the Project Site. Within the study area, Walgrove Avenue is designated as a Collector Street by the City and the City of Culver City. One through-travel lane is provided in each direction on Walgrove Avenue within the study area. Walgrove Avenue is posted for a 25-mph speed limit with the study area.

- Lincoln Boulevard—Lincoln Boulevard is a north-south oriented roadway located west of the Project Site. Within the study area, Lincoln Boulevard is designated as a Boulevard I within the study area. A separate exclusive left-turn lane is provided in the northbound direction on Lincoln Boulevard at the Marina Point Drive–Maxella Avenue intersection. Lincoln Boulevard is posted for a 40-mph speed limit within the study area.

- Del Rey Avenue—Del Rey Avenue a north-south oriented roadway located west of the Project Site. Within the study area, Del Rey Avenue is designated as a Local Street—Standard by the City. One through-travel lane is provided in each direction on Del Rey Avenue within the study area. Del Rey Avenue is posted for a 25-mph speed limit within the study area.

- Glencoe Avenue— Glencoe Avenue is a northwest-southeast oriented roadway that borders the Project Site to the east. Within the study area, Glencoe Avenue is designated as an Avenue II Modified north of Maxella Avenue, and as a Collector south of Maxella Avenue, by the City. One through-travel lane is provided in each direction on Glencoe Avenue north of Maxella Avenue and east of Mindanao Way. Two through-travel lanes are provided in each direction on Glencoe Avenue between Maxella Avenue and Mindanao Way. Separate exclusive left-turn lanes are provided in each direction on Glencoe Avenue at the Maxella Avenue and Mindanao Way intersections. A separate exclusive

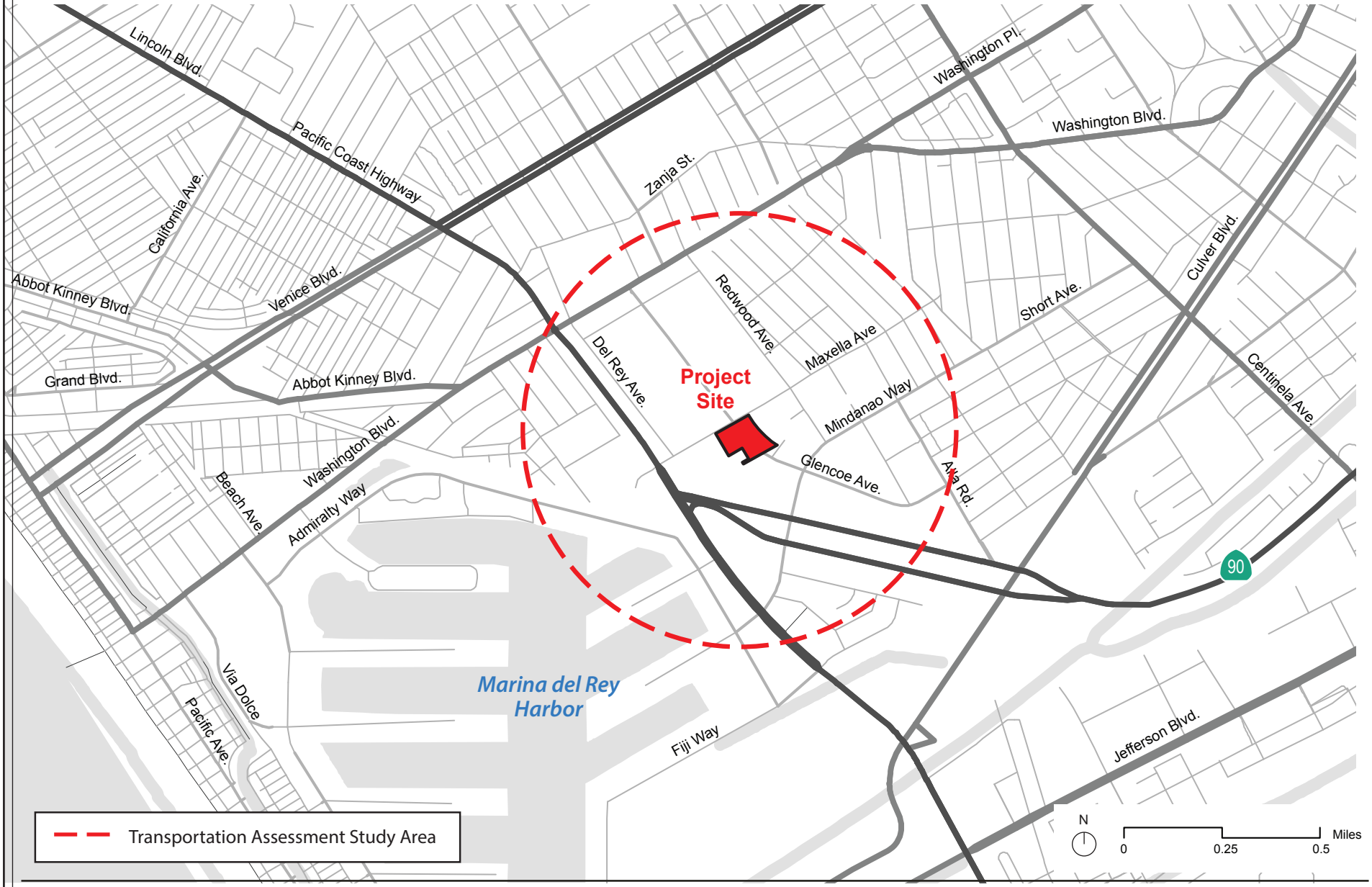

Figure IV.K-1
Project Site and Study Area

Source: Eyestone Environmental, 2021.

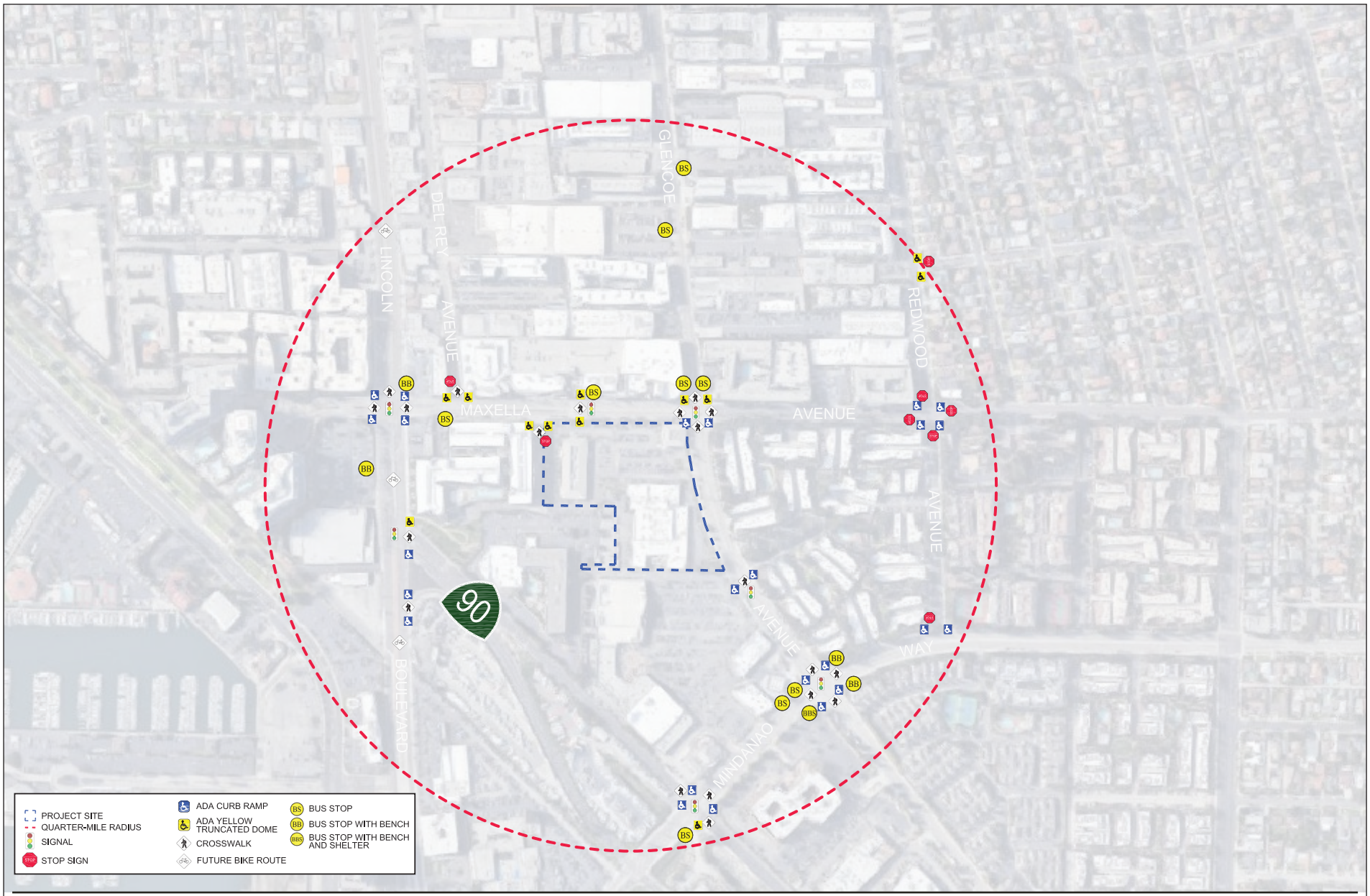

Figure IV.K-2
Facilities Inventory

Source: Linscott Law & Greenspan, Transportation Assessment for Paseo Marina Project, October 21, 2020.

right-turn lane is provided in the northbound direction on Glencoe Avenue at the Maxella Avenue intersection, and in the eastbound direction at the Mindanao Way intersection. Glencoe Avenue is posted for a 25-mph speed limit within the Project study area.

- Mindanao Way—Mindanao Way is a north-south oriented roadway located south of the Project Site. Within the study area, Mindanao Way is designated as an Avenue II north of Glencoe Avenue, and as an Avenue I south of Glencoe Avenue, by the City. Two through-travel lanes are provided in each direction on Mindanao Way within the study area. Separate exclusive left-turn lanes are provided on Mindanao Way at the Glencoe Avenue, SR-90 Westbound, SR-90 Eastbound, and La Villa Marina intersections. A separate exclusive right-turn lane is provided in the northbound direction on Mindanao way at the SR-90 eastbound intersection. Mindanao Way is posted for a 30-mph speed limit within the study area.

- Washington Boulevard—Washington Boulevard is an east-west oriented roadway located north of the Project Site. Within the study area, Washington Boulevard is designated as a Boulevard II by the City and as a Primary Arterial by the City of Culver City. Two through-travel lanes are provided in each direction on Washington Boulevard within the study area. A separate exclusive left-turn lane is provided on Washington Boulevard in the eastbound direction at the Walgrove Avenue intersection. Washington Boulevard is posted for a 35-mph speed limit in the study area.

- Marina Pointe Drive—Marina Pointe Drive is an east-west oriented roadway located north of the Project Site. Within the study area, Marina Pointe Drive is designated as a Private Street by the City. One through-travel lane is provided in each direction on Marina Pointe Drive within the study area. A separate exclusive left- and right-turn lane on Marina Pointe Drive in the eastbound direction at the Lincoln Boulevard intersection within the study area. There is no speed limit posted on Marina Pointe Drive within the study area; thus, a prima facie speed limit of 25 mph is assumed, consistent with California Vehicle Code Section 22352(b)(1).

- Maxella Avenue—Maxella Avenue is an east-west oriented roadway that borders the Project Site to the north. Within the study area, Maxella Avenue is designated as a Avenue III west of Glencoe Avenue, and as a Collector Street east of Glencoe Avenue, by the City. Two through-travel lanes are provided in each direction on Maxella Avenue west of Glencoe Avenue. One through-travel lane is provided in each direction east of Glencoe Avenue. Separate exclusive left-turn lanes are provided in each direction on Maxella Avenue at the Glencoe Avenue intersection, in the westbound direction at the Lincoln Boulevard intersection, and the eastbound direction at the Del Rey Avenue intersection. A separate exclusive right-turn lane is provided on Maxella Avenue in the westbound direction at the Lincoln Boulevard intersection and the eastbound

direction at the Glencoe Avenue intersection. Maxella Avenue is posted for a 25-mph speed limit in the study area.

- La Villa Marina—La Villa Marina is an east-west oriented roadway located southeast of the Project Site. Within the study area, La Villa Marina is designated as a Local Street—Standard by the City. One through-travel lane is provided in each direction on La Villa Marina within the study area. La Villa Marina is posted for a 25-mph speed limit within the study area

(b) Highways

Regional vehicular access to the Project Site is primarily provided by State Route 90 (SR-90). SR-90 is an east-west State Highway that locally extends from Marina del Rey to Culver City. In the immediate vicinity of the Project Site, SR-90 is known as the Marina Expressway, and provides at-grade intersections. East of Culver Boulevard, SR-90 is known as the Marina Freeway. In the Project study area, two to three travel lanes are provided in each direction on SR-90. In the immediate vicinity of the Project Site, SR-90 intersects Mindanao Way and Lincoln Boulevard in both the eastbound and westbound direction. The SR-90 intersections at Mindanao Way and Lincoln Boulevard are located approximately 0.25 mile southeast and southwest of the Project Site, respectively.

(3) Transit Service

Public transit service within the study area is currently provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica Big Blue Bus. The existing transit lines/routes in the study area are shown in Figure 3-6 of the Transportation Assessment, included in Appendix J of this Recirculated Draft EIR. The following list presents a brief description of the eight bus lines providing service in the vicinity of the Project Site. For additional information on the transit lines operating in the study area, including frequency of service, refer to Table 3-1 of the Transportation Assessment.

- Metro 108/358—Route 108/358 is a local line that travels from Pico Rivera to Marina del Rey via Slauson Avenue. The nearest roadway to the Project Site where this line travels is Mindanao Way.

- LADOT CE 437A—Route 437A is a commuter express line that travels from downtown Los Angeles to Culver City, Marina del Rey, and Venice Beach via Culver Boulevard, Grand Avenue, and Olive Street. The nearest roadway to the Project Site where this line travels is Mindanao Way.

- Culver CityBus Line 1—Culver CityBus Line 1 is a local line that travels from Venice Beach to the West Los Angeles Transit Center via Washington Boulevard. The nearest roadway to the Project Site where this line travels is Washington Boulevard.

- Culver CityBus Line 2—Culver CityBus Line 2 is a local line that travels from Venice High School to the Westfield Culver City Mall via Inglewood Boulevard. The nearest roadway to the Project Site where this line travels is Washington Boulevard.

- Culver CityBus Line 7—Culver CityBus Line 7 is a local line that travels from Marina del Rey to downtown Culver City via Culver Boulevard. The nearest roadways to the Project Site where this line travels are Mindanao Way Glencoe Boulevard, Maxella Avenue, and Lincoln Boulevard.

- Santa Monica Big Blue Bus—Route 3 is a local line that travels from the Aviation Center Green Line to downtown Santa Monica via Lincoln Boulevard. The nearest roadway to the Project Site where this line travels is Lincoln Boulevard.

- Santa Monica Big Blue Bus 14—Route 14 is a local line that travels from Playa Vista to Brentwood via Bundy Drive and Centinela Avenue.

- Santa Monica Big Blue Bus 16—Route 16 is a local line that travels from West Los Angeles to Marina del Rey via Wilshire Boulevard and Bundy Drive. The nearest roadway to the Project Site where this line travels is Washington Boulevard.

(4) Project Site

The Project Site is currently occupied by three commercial (retail and restaurant) structures that are part of the Marina Marketplace shopping center. The existing surface parking areas within the Project Site include a total of 418 parking spaces.

Existing vehicular access to the Project Site is provided via two driveways along the east side of Ocean Way, one driveway along the south side of Maxella Avenue, and two driveways along the west side of Glencoe Avenue.

(5) Bicycle Facilities

Based on the City's 2010 Bicycle Plan, the existing bicycle system in the study area consists of bicycle paths (Class I), bicycle lanes (Class II), and bicycle routes (Class III). Bicycle paths (Class I) are exclusive car-free facilities that are typically not located within roadway areas. Bicycle paths are located within or adjacent to river corridors, transit corridors, or the coast. Bicycle lanes (Class II) are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Bicycle routes and bicycle-friendly streets (Class III) are those where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes and bicycle-friendly streets are preferably located on collector and lower volume arterial streets. Bicycle routes with

shared lane markings, or "sharrows," make motorists aware of bicycles potentially in the travel lane, and show bicyclists the correct direction of travel. The following bicycle facilities are provided in the study area:[8]

(a) Bicycle Path (Class I)

- Culver Boulevard between McConnell Avenue and Inglewood Boulevard
- Admiralty Way from Fiji Way to Washington Boulevard

(b) Bicycle Lane (Class II)

- Lincoln Boulevard between SR-90 and Rose Avenue
- Washington Boulevard between Ocean Avenue and Lincoln Boulevard
- Alla Road between Glencoe Avenue and Culver Boulevard
- Short Avenue east of Alla Road

Also in the vicinity of the Project Site is the Marvin Braude Bike Trail, which runs from Will Rogers State Beach in Pacific Palisades to Washington Boulevard west of the Project Site.

Additionally, as shown in Figure 3-4 of the Transportation Assessment, Maxella Avenue and Glencoe Avenue, segments of which border the Project Site, are designated as part of the City's Neighborhood Enhanced Network (NEN), a selection of streets that provide safe routes for non-motorized modes of travel such as bicycling.

(6) Pedestrian Facilities

The area surrounding the Project Site includes a network of pedestrian facilities, including sidewalks, crosswalks, and pedestrian safety features. The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks also provide connectivity to pedestrian crossings at intersections within the study area.

Public sidewalks that range in width from 9 feet to 11 feet are provided along the Maxella Avenue and Glencoe Avenue frontages. Figure 3–2 in the Transportation

[8] *Los Angeles Department of Transportation, 2010 Bicycle Plan, Bike Plan Map—Central/Westside, updated June 2015.*

Assessment, included in Appendix J of this Recirculated Draft EIR, shows the existing and planned pedestrian, bicycle, and transit facilities within an approximately 0.25-mile radius (i.e., 1,320 feet) from the Project Site.

As indicated previously, the City's Mobility Plan 2035 identifies a collection of arterial streets, known as Pedestrian Enhanced Districts (PEDs), where pedestrian improvements could be prioritized to provide enhanced walking connections to and from the major destinations within communities. As indicated in Figure 3-3 of the Transportation Assessment, included in Appendix J of this Recirculated Draft EIR, Lincoln Boulevard and Mindanao Way are designated PEDs within the study area.

(7) High Injury Network

As indicated in Figure 3-10 in the Transportation Assessment, included in Appendix J of this Recirculated Draft EIR, Lincoln Boulevard, located one block west of the Project Site, is identified on the High Injury Network.

(8) Transit Enhanced Network

Mobility Plan 2035 identifies a collection of streets, known as the Transit Enhanced Network, where improvements, in collaboration with transit operators, aim to provide reliable and frequent service that is convenient and safe, increase transit ridership, reduce single-occupancy vehicle trips and integrate transit infrastructure improvements with the identity of the surrounding street. Potential enhancements range from streetscape improvements, installation of transit shelters, or installation of dedicated transit lanes. As indicated in Figure 3-7 of the Transportation Assessment, included in Appendix J of this Recirculated Draft EIR, the street closest to the Project Site included in the Transit Enhanced Network is Lincoln Boulevard located one block west of the Project Site.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access.

In assessing impacts related to transportation in this section, the City used Appendix G as the thresholds of significance. The factors and considerations identified from the *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds.

The methodology and base assumptions used in this analysis were established by LADOT, and, where LADOT does not prescribe a specific methodology, the criteria identified in the *L.A. CEQA Thresholds Guide* were used. The *L.A. CEQA Thresholds Guide* criteria is discussed below as part of the methodology discussion.

b. Methodology

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

As discussed above, with the implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is no longer considered a potential significant impact on the environment. As provided above, the CEQA Guidelines' Transportation Threshold (a) has been updated to require an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the applicable plans, programs, ordinances, and policies listed above in the Regulatory Framework subsection. In accordance with the LADOT TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

A project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, program, ordinance or policy. Rather, it is the intention of the threshold test to ensure that the proposed development does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies.[9] 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

[9] *City of Los Angeles Department of Transportation, Transportation Assessment Guidelines, page 2-2 (July 2020).*

each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

The California Office of Planning and Research (OPR) issued proposed updates to the State CEQA Guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR Technical Advisory) that amended one of the Appendix G significance thresholds for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3 (b)(1) of the State CEQA Guidelines to ask if the project would result in a substantial increase in vehicle miles traveled (VMT). OPR has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds.[10] The City's TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019 and adopted an update in July 2020.

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

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.

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

- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.

- For regional serving retail projects, the project would result in a net increase in VMT.

- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

The City's TAG establishes different VMT significance thresholds for each of the seven Area Planning Commission areas as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City's significance thresholds (i.e., based on a Daily Household VMT per Capita basis and a Daily Work VMT per Employee) for each of the APC areas are presented in the TAG. As the Project Site is located within the area governed by the West Los Angeles APC, the VMT significance impact criterion (i.e., 15 percent below the APC average) applicable to the Project is 7.4 Daily Household VMT per Capita and 11.1 Daily Work VMT per Employee.[11]

Local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Local-serving is defined as retail uses (including restaurants) that are less than 50,000 square feet. The retail/restaurant component of the Project is considered to be local serving and this portion of the Project is considered to not have a significant VMT impact based on the screening criteria contained in the City's TAG.

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

(b) VMT Analysis Methodology

LADOT prepared a tool (VMT Calculator) designed to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The VMT Calculator (Version 1.3, released July 2020) accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT Calculator include travel behavior zones,

[11] *The VMT impact significance criteria for each APC, including the West Los Angeles APC, are identified in LADOT's Transportation Assessment Guidelines, Table 2.2-1, July 2020.*

mixed-use development methodology, population and employment assumptions, and transportation demand management (TDM) measures.

(i) Travel Behavior Zone

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

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

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

(ii) Mixed-Use Development Methodology

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

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

- Household size

(iii) Travel Demand Forecasting

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

(iv) Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the United States Department of Energy, and other modeling resources.[12] A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.[13]

(v) Transportation Demand Management Measures

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

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

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

[13] *LADOT, City of Los Angeles VMT Calculator Document—Version 1.3, Table 1, May 2020.*

7. Neighborhood Enhancement

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

(3) Hazardous Design Features

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

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

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

- For the identified freeway off-ramps, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year. Evaluate the adequacy of the existing and future storage lengths with the 95th percentile queue and 100 percent of the storage length on each lane of the ramp from the stop line to the gore point. When an auxiliary lane is present, add 50 percent of the length of the auxiliary lane to the ramp storage area.

- If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the

mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact

- If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue. The Caltrans Performance Measurement System (PeMS) data should be used to identify freeway operating speed(s) during the peak hour being analyzed. If reliable PeMS data are not available at the subject location, other sources of speed data including location-based services data from available sources could be used.

- If the speed differential is 30 mph or more, which may result in a potential safety issue, the guidance suggests a proposed project should consider the following preferred corrective measures to offset a potential safety issue:

  - Transportation demand management program(s) to reduce the project's trip generation,

  - Investments to active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's trip generation, and/or

  - Potential operational change(s) to the ramp terminal operations including, but not limited to, lane reassignment, traffic signalization, signal phasing or timing modifications, etc. This option requires coordination with Caltrans and LADOT to assess feasibility and for approval of the proposed measure(s).

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

(4) Emergency Access

The analysis of the Project's potential access impacts includes a review of the proposed vehicle access points and internal circulation. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these

features of the Project to impede emergency access on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would include the following project design features:

TR-PDF-1: Prior to the start of construction, the Project Applicant will prepare a Construction Staging and Traffic Management Plan and submit it to LADOT for review and approval. The Construction Staging and Traffic Management Plan will include a Worksite Traffic Control Plan and will be submitted it to the Los Angeles Department of Transportation for review and approval. The Worksite Traffic Control Plan will identify the location of any temporary street parking or sidewalk closures; show traffic/bus detours, haul routes, and hours of operation; provide for the posting of signs advising transit riders and pedestrians of temporary sidewalk closures and providing alternative routes; provide for the installation of other construction-related warning signs; and show access to abutting properties. Furthermore, the Construction Staging and Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site;
- Limit sidewalk and lane closures to the maximum extent practical, and avoid peak hours to the extent practical. Where such closures are necessary, the Project's Worksite Traffic Control Plan will

identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity; and/or

- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

TR-PDF-2: As part of the Project, the Applicant, in conjunction with LADOT, will design and implement roadway striping changes along Maxella Avenue at the Ocean Way intersection. Specifically, the existing signalized crosswalk located approximately 100 feet west of the east leg of the intersection will be removed, and crosswalks will be installed at the Ocean Way/Maxella Avenue intersection. Additionally, the Applicant, in conjunction with LADOT, will install a traffic signal at the intersection with controlled crossing devices (i.e., signalized crosswalks).

In addition to the above, the Project would make at least 30 percent of the total code-required parking spaces as capable of supporting future electric vehicle supply equipment (EVSE) and would equip at least 10percent of the total code-required parking spaces with EV charging.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options—Option A and Option B. Option A would include 658 residential apartment dwelling units, 13,650 square feet of restaurant floor area, and 13,650 square feet of commercial retail floor area. Option B would include 425 residential apartment dwelling units, 20,000 square feet of restaurant floor area, 20,000 square feet of commercial retail floor area, and 90,00 square feet of office floor area. All the existing on-site uses would be removed under both options. Vehicular access under both options would be from Glencoe Avenue, Maxella Avenue, and Ocean Way. The following analysis accounts for both development options, and the term “Project” is used to describe both options unless stated otherwise.

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

Attachment D, Plan Consistency Worksheet, of the TAG identifies a series of City adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City.[14] Attachment D to the TAG also provides a series of questions to help guide the review of the identified documents.[15] Those questions and their responses are provided in Appendix G (for Project Option A) and in Appendix H (for Project Option B) of the Transportation Assessment, included in Appendix J of this Recirculated Draft EIR.

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

Based on the TAG, the following plans apply to the Project: Mobility Plan 2035; Palms–Mar Vista–Del Rey Community Plan; Coastal Transportation Corridor Specific Plan; Vision Zero; Plan for a Healthy Los Angeles; Citywide Design Guidelines; LAMC; and SCAG's RTP/SCS. The Project's potential to conflict with these plans 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.

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[14] *LADOT, Transportation Assessment Guidelines, July 2020.*

[15] *LADOT, Transportation Assessment Guidelines, July 2020.*

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.

Mobility Plan 2035 further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are listed in Appendix G (for Project Option A) and in Appendix H (for Project Option B) of the Transportation Assessment, included in Appendix J of this Recirculated Draft EIR, along with a detailed discussion of the Project's consistency with each. A summary of the analysis from the Transportation Assessment is provided below.

With regard to Mobility Plan 2035 public right-of-way classification standards for dedications and improvements, Mobility Plan 2035 policies applicable to the Project include Policy 2.1, Policy 2.3, Policy 2.4, and Policy 3.2, as follows:

- *Policy 2.1—Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands:* As detailed in the Transportation Assessment, the Project (under both Option A and Option B) is required to make dedications or improvements to the public right-of-way. Specifically, a three-foot street dedication is required for Maxella Avenue and Glencoe Avenue along the Project Site. The Project (under both Option A and Option B) would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict future changes by various City Departments.

- *Policy 2.3—Pedestrian Infrastructure. Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment*: The Project (under both Option A and Option B) would not alter pedestrian infrastructure or the right-of-way in a manner that would preclude or conflict future changes by various City Departments. The Project prioritizes pedestrian access and connectivity, consistent with Maxella Avenue's designation as a Pedestrian Enhanced District (PED). As discussed above, the Project (under either Option A or Option B) would make a three-foot street dedication on Maxella Avenue and Glencoe Avenue along the Project Site. Once the dedications are provided, the City will be free to install modifications along Maxella Avenue as part of the PED network. Additionally, as part of Option A, a paved pedestrian paseo internal to the Project Site would be installed, which provides safe connections to the various buildings on the Project Site. The pedestrian paseo will provide connections to the sidewalk along the Project Site's Glencoe Avenue frontage, as well as the Project Site's Ocean Way frontage.

- *Policy 2.4—Neighborhood Enhanced Network. Provide a slow speed network of locally serving streets*: Maxella Avenue and Glencoe Avenue have been designated within the City's Neighborhood Enhanced Network (NEN). The Project (under Option A and Option B) will make the required three-foot street dedication along Maxella Avenue and Glencoe Avenue to comply with Mobility Plan 2035. Once the dedication is provided, the City will be free to install modifications such as shared laned markings as part of the NEN. The Project (under either Option A or Option B) would not modify Maxella Avenue or Glencoe Avenue in a way that would substantially increase travel speed.

- *Policy 3.2—People with Disabilities. Accommodate the needs of people with disabilities when modifying of installing infrastructure within the public right-of-way:* The Project (under either Option A or Option B) would not alter existing ADA infrastructure or the right-of-way in a manner that would preclude or conflict future changes by various City Departments.

The Transportation Assessment further considers Mobility Plan 2035 public right-of-way policy alignment with Project-initiated changes. As detailed in the Transportation Assessment and described above, the Project would be required to make dedications or improvements to the public right-of-way. Specifically, a three-foot street dedication is required for Maxella Avenue and Glencoe Avenue along the Project Site. However, the Project (under both Option A and Option B) would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict future changes by various City Departments. Additionally, as detailed above, the Project (under both Option A and Option B) would not alter pedestrian infrastructure or the right-of-way in a manner that would preclude or conflict future changes by various City Departments. The Project prioritizes pedestrian access and connectivity, consistent with Maxella Avenue's designation as a Pedestrian Enhanced District. With regard to applicable Mobility Plan policies related to driveway access, all loading activities for either Project Option A or Option B would occur off-street and internal to the Project Site consistent with Mobility Plan Policy 2.10 to facilitate the provision of on and off-site street loading areas. The Project would also not conflict with Mobility Plan 2035 Program PL.1 to require driveway access to buildings from non-arterial streets or alleys in order to minimize interference with pedestrian access and vehicular movement. Specifically, as detailed in the Transportation Assessment, driveway access to the Project Site would be provided via Ocean Way, a private driveway, Maxella Avenue, an Avenue III, and Glencoe Avenue, a Collector street. While the existing Maxella Avenue driveway will be shifted, the overall number of curb cuts on Maxella Avenue adjacent to the Project Site would not change. Overall, the Project (under both Option A and Option B) has been designed to minimize interference with pedestrian access and vehicular movement.

As discussed in the Transportation Assessment, the Project also would not conflict with applicable policies related to network access and parking supply and Transportation Demand Management. Specifically, Policy 3.9 calls for increased network access by

discouraging the vacation of public rights-of-way while Policy 3.10 discourages the use of cul-de-sacs that do not provide access for active transportation options. The Project (under both Option A and Option B) would not vacate any public rights-of-way and the Project Site is not located on a cul-de-sac. As such, the Project would not conflict with these policies.

Additionally, the Project would not conflict with applicable Mobility Plan 2035 policies that aim to balance the needs of various users and trip purposes through a multimodal transportation network that includes features such as electric vehicle charging areas and bike sharing. In particular, the Project would not conflict with Policies 3.5 (Multi-Modal Features) 3.8 (Bicycle Parking), and 5.4 (Clean Fuels and Vehicles). The Project would not conflict with Mobility Plan Policy 3.5 as the Project would support multi-modal travel by maintaining surrounding sidewalks, providing on-site bike parking, and locating the proposed uses in close proximity to several transit options. In addition, the Project would not conflict with Mobility Plan Policy 3.8 to provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities as the Project would provide secure bicycle parking on-site. The Project also would not conflict with Policy 5.4 to encourage clean fuels and vehicles as the Project would provide electric vehicle charging stations within the Project Site in accordance with LAMC requirements.

As further discussed in the Transportation Assessment included in Appendix J of this Recirculated Draft EIR, the Project (under both Option A and Option B) would not conflict with Mobility Plan 2035 Policy 4.8 to encourage greater utilization of Transportation Demand Management strategies to reduce dependence on single-occupancy vehicles. Specifically, both Option A and Option B would comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in LAMC Section 12.26.J) as well as the TDM requirements of the Coastal Transportation Corridor Specific Plan. As detailed further below, Option B would also include additional TDM strategies as mitigation to reduce the option's potentially significant VMT impact.

As discussed in the Transportation Assessment, the Project would not conflict with Mobility Plan Policy 4.13, the objective of which is to balance parking supply with other transportation and land use objectives. Specifically, the Project would not conflict with the portion of Mobility Plan Policy 4.13 that discourages utilizing land for parking that could have been used for other valuable uses since all parking will be located in a subterranean/ fully-enclosed above-grade parking garage. Moreover, residents, employees and visitors will have to pay for parking; therefore, the Project does not conflict with the policy regarding the abundance of free parking. Additionally, Option A would provide vehicle parking spaces in accordance with the LAMC. Option A would also provide the LAMC-required number of bicycle parking spaces, and the Project Site is within convenient walking distance to public transit routes along Maxella Avenue and Glencoe Avenue. While Option B would include parking in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling, would provide the number of bicycle parking

spaces required by LAMC, and would implement a transportation demand management (TDM) plan to promote multi-modal transportation. Furthermore, the Project (under both Option A and Option B) would be consistent with the applicable goals and objectives of SCAG to locate jobs and housing in infill locations served by public transportation (RTP Objective: Location Efficiency) and facilitating active transportation and TDM (RTP Objectives: Safety and Health /Transportation System Sustainability). Therefore, the Project (under both Option A and Option B) would not undermine broader regional goals of creating vibrant public spaces (RTP Goal: Supporting Commerce, Economic Growth, and Opportunity) and a robust multi-modal transportation system (RTP Goal: Giving People More Transportation Choices). As previously noted, 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. Therefore, although the amount of parking under Option B may exceed the LAMC's minimum requirements, the Project would be consistent with the overall intent of Policy 4.13 and the Mobility Plan.

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

(b) Palms–Mar Vista–Del Rey Community Plan Community Plan

As detailed in the Transportation Assessment, the Project would not conflict with the applicable transportation-related objectives and policies of the Palms–Mar Vista–Del Rey Community Plan. Specifically, the Project (under both Option A and Option B) would support Objective 10-2 to increase the work trips and non-work trips made on public transit as the Project Site is located within convenient walking distance to many public transit lines along Maxella Avenue and Glencoe Avenue, which would be easily accessible to visitors and employees of the Project. The Project also would not conflict with Objective 11-1 and associated Policies 11-1.1 and 11-1.2 to pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips. As previously discussed above, Option A would comply with existing applicable City ordinances (e.g., the City's TDM Ordinance) as well as the TDM requirements of the Coastal Transportation Corridor Specific Plan. In addition to compliance with these existing regulations, Option B would implement specific TDM strategies as mitigation measures, including providing transit subsidies and alternative work schedules and telecommuting programs, to reduce the Option's potentially significant VMT impact.

Both Option A and Option B would further support Objective 12-1 and associated Policy 12-1.4 to promote an adequate system of bikeways and encourage the provision of

changing rooms, showers, and bicycle storage at new non-residential developments and public places. As detailed in the Transportation Assessment, both Option A and Option B would provide the LAMC-required number of bicycle parking spaces. Secure bicycle parking would be provided under Option A on all levels of the onsite parking garage. In addition, Option B would provide end-of-trip bicycle facilities, including secure bicycle parking and showers to support safe and comfortable bicycle travel. Objective 12-2 further promotes pedestrian-oriented mobility and utilization of the bicycle for commuter, school, recreational use, economic activity, and access to transit facilities. As previously discussed, Option A includes a paved pedestrian paseo internal to the Project Site, which provides safe connections to the various buildings on the Project Site. Additionally, the pedestrian paseo would provide connections to the sidewalk along the Project Site's Glencoe Avenue frontage, as well as the Project Site's Ocean Way frontage. Option B would provide connections to the sidewalks along the Project Site's Maxella Avenue and Glencoe Avenue frontages, as well as the Project Site's Ocean Way frontage.

The Project also would not conflict with Objective 13-1 and applicable Policy 13-1.1 and Policy 13-1.2 to provide parking in appropriate locations in accordance with Citywide standards and community needs, consolidate parking to minimize the number of ingress and egress points onto arterials, and to develop new parking lots and garages in accordance with design standards. As previously discussed, Option A would provide vehicular parking spaces in accordance with the LAMC while Option B would provide parking in excess of LAMC requirements. Notwithstanding, both Option A and Option B would provide only the number of ingress and egress points necessary to safely circulate the Project Site and parking areas. In addition, the onsite parking would be developed in accordance with City standards. While Option B would provide parking in excess of LAMC requirements, Option B would implement TDM strategies to encourage travel to and from the Project Site by alternative modes of transportation. Therefore, the Project would not conflict with the applicable transportation-related objectives and policies of the Palms–Mar Vista–Del Rey Community Plan.

(c) Coastal Transportation Corridor Specific Plan

The Project would not conflict with the applicable purposes of the Specific Plan. In particular, the Project under both options would support the purpose to encourage walking and bicycling as a means to safely and conveniently access transit and circulate within the neighborhood as both options would provide parking in accordance with LAMC requirements. In addition, the Project would include the development of housing, including affordable housing, within proximity to jobs provided on the Project Site and within the Project Site vicinity. The Project would also comply with the transportation mitigation standards and procedures set forth in Section 5 of the Specific Plan. In particular, in consultation with LADOT, the Transportation Assessment has considered the trip generation rates provided in Appendix A of the Specific Plan. The Project's Transportation

Assessment, included in Appendix J of this Recirculated Draft EIR, has been reviewed by LADOT and a copy of LADOT's Assessment Letter of the Transportation Study is included in Appendix J of this Recirculated Draft EIR. Also, the Project includes project design features and mitigation measures to address the transportation impacts of the Project. Furthermore, the Project would comply with the improvement, dedication, transportation measures, TDM and phasing requirements outlined in Sections 9 and 10 of the Specific Plan.

Regarding the TIA Fee established by the Specific Plan, the Specific Plan requires that this fee be paid by project applicants pursuant to the terms of the Specific Plan. These Specific Plan terms include, but are not limited to: (1) Section 5.A. of the Specific Plan which requires that project applicants pay this fee prior to the issuance of the first permit for the Project by the City of Los Angeles Department of Building and Safety (LADBS) (or per Section 7.C, if the Project qualifies as a residential project, the fee may be paid at the time of issuance of the first certificate of occupancy); and (2) Section 7.B of the Specific Plan which requires that the fee amount for a project shall be determined by LADOT. The Project Applicant will pay the required TIA fee for the Project in accordance with the requirements of the Specific Plan.

(d) Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. As discussed above, Lincoln Boulevard is included in the High Injury Network. LADOT maintains a list of active Vision Zero projects on its website. No active Vision Zero projects are proposed along Lincoln Boulevard in the study area—the closest Vision Zero project is in the stretch of Lincoln Boulevard north of Venice Boulevard, approximately 0.85 mile northwest of the Project Site. Furthermore, the Project would not interfere with any future Vision Zero improvements along Lincoln Boulevard in the Project vicinity. Thus, the Project would not conflict with Vision Zero.

(e) Plan for a Healthy Los Angeles

The Project would not conflict with the transportation-related objectives and policies of the Plan for a Healthy Los Angeles. In summary, the Project would support the goals and objectives of the Plan for a Healthy Los Angeles to provide housing in a safe, livable, and sustainable environment, promoting walkability and biking, and implementing safety features by providing: (1) an urban infill project in close proximity to jobs, shopping opportunities, services and transit; (2) on-site vehicular and bicycle parking per the LAMC (LAMC-required vehicular parking under Option A): (3) open space areas and plazas with pedestrian paths connecting to the existing sidewalks fronting the Project Site along Maxella Avenue and Glencoe Avenue; (4) streetscape and sidewalk improvements; (5) exterior lighting of Project pedestrian paths, building entrances, and parking areas; and

(6) marked pedestrian crosswalks across Project driveways and at the proposed new traffic signal on Maxella Avenue.

Furthermore, the Project would support the Plan for a Healthy Los Angeles goals and objectives related to reducing vehicle trips, VMT, and associated air emissions, through compliance with the TDM requirements of the City's TDM Ordinance, Palms–Mar Vista–Del Rey Community Plan, and Coastal Transportation Corridor Specific Plan and providing at least 30 percent of the total code-required parking spaces as capable of supporting future electric vehicle supply equipment. Lastly, the Project would not limit or preclude the City's ability to implement programs and policies in furtherance of the Plan for a Healthy Los Angeles.

(f) Citywide Design Guidelines

As evaluated in detail in Section IV.H, Land Use, of this Recirculated Draft EIR, the Project would not conflict with the general intent of the Citywide Design Guidelines. As it relates to transportation, the Transportation Assessment specifically addresses Guideline 2, which seeks to carefully incorporate vehicular access such that it does not degrade the pedestrian experience. As discussed in the Transportation Assessment, the Project would be consistent with all of the site planning best practices identified in the Citywide Design Guidelines under Guideline 2, as follows:

- *Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible*: Both Option A and Option B would prioritize pedestrian access first. Option A would reduce the number of curb cuts along Glencoe Avenue from three to two while Option B would reduce the number of curb cuts along the Project Site's Glencoe Avenue frontage from two to zero. Vehicular access to the Project Site's parking garages from the Ocean Way and Glencoe Avenue access points would be provided on the sides of buildings, away from the public-right-of-way (under both Option A and Option B). While vehicular access to onsite parking would be provided along Maxella Avenue, the Project (under both Option A and Option B) would not add additional curb cuts to the Maxella Avenue public right-of-way.

- *Minimize both the number of driveway entrances and overall driveway widths*: Option A proposes driveway entrances from the public right-of-way at the Ocean Way/Maxella Avenue intersection, along Maxella Avenue, along Glencoe Avenue, and at the existing southerly Glencoe Avenue driveway. Option A would reduce the number of curb cuts along the Project Site's frontage from two to one. Option B proposes driveway entrances from the public right-of-way at the Ocean Way/Maxella Avenue intersection, along Maxella Avenue, and at the existing Glencoe Avenue driveway adjacent to the Project Site. As the existing Glencoe

Avenue driveway is adjacent to the Project Site, Option B would remove all curb cuts along the Project Site's Glencoe Avenue frontage. All driveways under either Option A or Option B would be constructed in accordance with City driveway standards.

- *Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks*: Under Option A, a passenger loading area is proposed internal to the Project Site with the westerly residential building's parking garage. Under Option B, a passenger loading area is proposed along the east side of Ocean Way, along the westerly portion of the Project Site. As such, the Project would not locate drop-off/pick-up areas between primary building entrances and adjoining sidewalks.

- *Orient vehicular access as far from street intersections as possible*: Under Option A, the Maxella Avenue driveway would be located approximately 154 feet west of the Glencoe Avenue/Maxella Avenue intersection and the northerly Glencoe Avenue driveway would be located approximately 272 feet south of the Glencoe Avenue/Maxella Avenue intersection. Under Option B, the Maxella Avenue driveway would be located 263 feet west of the Glencoe Avenue/Maxella Avenue intersection.

- *Place drive-thru elements away from intersections and avoid placing them so that they create a barrier between the sidewalk and building entrance(s)*: The Project (under both Option A and Option B) does not propose any drive-through elements.

- *Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances*: All loading activities for the Project (under both Option A and Option B) would occur off-street and internal to the Project Site. Loading activities associated with service and delivery operations, trash collection and waste management for Option A would occur along the south side of the westerly residential building and the south side of the southerly residential building (i.e., at the westerly and southeasterly portions of the Project Site), away from access points to parking and public entrances. Service and delivery vehicles would utilize the northerly and southerly Glencoe Avenue driveways to access Option B's service areas. Loading activities associated with service and delivery operations, trash collection and waste management for Option B would occur along the northwest and south-central portions of the Project Site. Service and delivery vehicles would utilize the northerly Ocean Way access points, Maxella Avenue driveway, and Glencoe Avenue driveway to access the loading zones and trash/recycling areas located within the at-grade level of the onsite parking garage. Additionally, a passenger drop-off/pick-up area is provided along east side of Ocean Way, internal to the Project Site.

In summary, the Project would not conflict with the applicable guideline and associated design best practices of the Citywide Design Guidelines.

(g) LAMC

Per Sections 12.21 A.4.(a), 12.21 A.4.(c)(3), and 12.21 A.4.(c)(5) of the LAMC, the Project would require a total of 1,217 vehicle parking spaces. As described in Section II, Project Description, of this Recirculated Draft EIR, Option A would provide a total of 1,217 vehicle parking spaces and Option B would provide a total of 1,287 vehicle parking spaces, and, therefore, would comply with the applicable parking requirements of the LAMC. In addition, in accordance with Section 12.21 A.16(a)(2) of the LAMC, Option A would include 752 bicycle parking spaces, including 80 short-term and 672 long-term bicycle parking spaces, while Option B would include 267 bicycle parking spaces, including 219 long-term spaces and 48 short-term spaces, in compliance with LAMC Sections 12.21 A.16(a)(1) and 12.21 A.16(a)(2).

The Project would also comply with the City's TDM Ordinance (LAMC Section 12.26.J) (as well as with the TDM requirements of the Palms–Mar Vista–Del Rey Community Plan and Coastal Transportation Corridor Specific Plan).

Per LAMC Section 12.37, a three-foot street dedication is required for Maxella Avenue along the Project Site to meet the street designation standards for this roadway in Mobility Plan 2035. This dedication would be provided by the Project.

Lastly, the Project, including but not limited to the proposed driveways, internal vehicular circulation, parking, and proposed new traffic signal along Maxella Avenue, would be designed and constructed in accordance with LAMC requirements.

In summary, the Project would be generally consistent with the applicable provisions of the LAMC.

(h) Regional Transportation Plan/Sustainable Communities Strategy

The Project's general consistency with the applicable goals and principles set forth in SCAG's 2020-2045 RTP/SCS is analyzed in detail in Section IV.B, Air Quality, and in Section IV.H, Land Use, of this Recirculated Draft EIR. As described therein, the Project would not conflict with the applicable goals and principles set forth in the RTP/SCS. In summary, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods as well as reducing GHG emissions by developing new residential, retail, restaurant, and office uses (Option B) on a Project Site on an urban infill site within an area well served by public transit provided by Metro, LADOT Transit Commuter Express, Culver CityBus, and City of Santa Monica

Big Blue Bus. The Project would also provide for the development of diverse housing types in an area that is supported by multiple transportation options. In addition, the Project would provide bicycle parking spaces for Project uses to promote the use of alternative transportation.

With regard to the VMT and greenhouse gas (GHG) goals of SCAG's RTP/SCS, as detailed in the Transportation Assessment and further discussed below, Option A would not result in a significant VMT impact, and Option A would be consistent with the VMT and GHG goals of SCAG's RTP/SCS.

As previously discussed, in addition to compliance with the City's TDM Ordinance, Option B would incorporate additional TDM strategies as mitigation to reduce the option's potentially significant VMT impact. Implementation of the proposed TDM strategies would result in a Daily Household VMT per Capita impact that is less than significant. Similarly, as discussed in the Updated VMT Analysis for Option B included in Appendix J of this Recirculated Draft EIR, with implementation of the proposed TDM strategies and participation in the U-Pass program, the potentially significant VMT impacts resulting from Option B would be reduced to less than significant. Therefore, as the VMT impacts related to Option B have been shown to be mitigated, Option B would also be consistent with the VMT and GHG goals of SCAG's RTP/SCS.

(i) Conclusion

Based on the above, and as detailed in Appendix G (for Option A) and in Appendix H (for Option B) of the Transportation Assessment included in Appendix J of this Recirculated Draft EIR, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

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

As discussed above, the Project Site is located in the West Los Angeles Area Planning Commission and is subject to the following LADOT thresholds for determining VMT impacts: Daily Household VMT per Capital of 7.4 and Daily Work VMT per Employee of 11.1.

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The Project's land uses and their respective sizes are the primary input in the VMT Calculator. Copies of the detailed City of Los Angeles VMT Calculator worksheets for Project Option A and Option B are contained in Appendix D and Appendix E, respectively, of the Transportation Assessment. As indicated therein, the estimated Daily Household VMT per Capita for Option A is 6.9, which is less than the West Los Angeles APC significance threshold of 7.4 Daily Household VMT per Capita. As previously noted above, the commercial uses proposed as part of Option A and Option B would be less than 50,000 square feet and, per the City's TAG, would be considered local serving and not generate an impact related to VMT. As such, since Option A only proposes residential and commercial uses, only a Daily Household VMT per Capita calculation is applicable.

The estimated Daily Household VMT per Capita for Option B (prior to consideration of the TDM strategies previously mentioned) is 7.1, which would also be less than the West Los Angeles APC significance threshold of 7.4 Daily Household VMT per Capita. As Option B also includes an office component, a Daily Work VMT per Employee calculation was required. The estimated Daily Work VMT per Employee for Option B (prior to consideration of the TDM strategies previously mentioned) is 14.5, which is greater than the West Los Angeles APC significance threshold of 11.1 Daily Work VMT per Employee.

Based on the above, VMT impacts would be less than significant under Option A and potentially significant under Option B (for only the Daily Work VMT per Employee threshold).

(2) Mitigation Measures

For Option A, the Project-level VMT impact would be less than significant. Therefore, no mitigation measures are required for Option A. For Option B, while the Project-level Daily Household VMT per Capita would be less than significant, the Project-level Daily Work VMT per Employee would be significant. Therefore, the following mitigation measures are applicable for Option B:

Mitigation Measure TR-MM-1: The Project Applicant shall implement the following TDM measures (from Table 2-2-2 of the TAG) under Option B:

- Transit Subsidies: This TDM strategy involves the subsidization of transit fares for residents and employees of Option B. The subsidy shall be proactively offered to each resident and employee at least once annually for a minimum of five years. At the time of initial opening, Option B shall offer a daily transit subsidy to all (i.e., 100%) residents and employees of $2.98 per day.
- Promotions and Marketing: Utilize promotional and marketing tools to educate and inform residents and employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that residents and employees can choose to read at their own leisure.
- Alternative Work Schedules and Telecommuting Program: The strategy encourages employees to work alternative schedules or telecommute, including staggered start times, flexible schedules, or compressed workweeks. At the time of initial opening of the development, Option B shall offer 1.5 days per week of telecommuting to at least 5 percent of all employees.
- Include Bike Parking per Los Angeles Municipal Code: Per LAMC Table 12.21 A.16(a)(1)(i), provide 18 short-term and 181 long-term bicycle parking spaces for the residential component. Per LAMC Table 12.21 A.16(a)(2), provide 29 short-term spaces and 48 long-term spaces for the restaurant, commercial and office components.
- Include Secure Bicycle Parking and Showers: This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. Option B shall provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21 A.16(d)(2).

In addition, Option B shall provide showers in accordance with LAMC Section 91.6307.

- Pedestrian Network Improvements: This strategy involves implementation of pedestrian network improvements throughout and around the Project Site that encourage people to walk. This includes internally linking all uses within the Project Site with pedestrian facilities such as sidewalks and connecting the Project Site to the surrounding pedestrian network. Option B includes pedestrian access points directly to sidewalks on the adjacent streets, including Maxella Avenue and Glencoe Avenue. Additionally, Option B will add street trees and landscaping, including a park along the Project Site's easterly frontage, to enhance the pedestrian network and improve exterior lighting along the sidewalks to improve safety.

Mitigation Measure TR-MM-2: The Project Applicant shall participate in the U-Pass program, which funds transit passes for college students throughout Los Angeles County. The Project Applicant shall contribute the required amount of $18,578.00 to the U-Pass program annually for a minimum of seven (7) years. Future evaluations may be prepared using LADOT's VMT Calculator which may demonstrate that the Project's Option B TDM measures alone are sufficient to mitigate it significant VMT impact and that the purchase of transit passes for students is no longer required. Additionally, the annual fee shall be reduced if it is determined that fewer than 246 VMT are needed to be reduced to achieve a less than significant impact.

(3) Level of Significance after Mitigation

For Project Option A, Project-level impacts related to conflict with CEQA Guidelines Section 15064.3, subdivision (b) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

For Option B, while the Daily Household VMT per Capita of 7.1 would be less than the West Los Angeles APC significance threshold of 7.4 Daily Household VMT per Capita, implementation of the TDM strategies outlined above in Mitigation Measure TR-MM-1 would further reduce the Option B Daily Household VMT per Capita from 7.1 to a Daily Household VMT per Capita of 5.4. With implementation of Mitigation Measure TR-MM-1, the Option B Daily Work VMT per Employee would be reduced from 14.5 to 11.6, which would be just above the Daily Work VMT per Employee of the West Los Angeles APC significance threshold of 11.1 Daily Work VMT per Employee. Additionally, as detailed in the Updated VMT Analysis for Option B included in Appendix J of this Recirculated Draft EIR, with implementation of Mitigation Measure TR-MM-2, the Project's potentially significant VMT impact would be further reduced to less than significant.

Based on the above, Option B impacts related to conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be reduced to less than significant with incorporation of mitigation measures.

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

(1) Impact Analysis

As evaluated in the Initial Study for the Project, included in Appendix A of this Recirculated Draft EIR, and summarized in Section VI, Other CEQA Considerations, of this Recirculated Draft EIR, the Project Site would not substantially increase hazards due to a design feature. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections, and the Project does not include any proposed modifications to the street system or any dangerous design features. The residential and commercial uses proposed by the Project would be consistent with the surrounding uses in the vicinity of the Project Site and would not introduce any hazards onto or adjacent to the Project Site. The Project design would also be reviewed by the Los Angeles Department of Building and Safety (LADBS) and LADOT during the City's plan review process to ensure all applicable building design requirements are met.

As discussed in the Transportation Assessment, the Project Site has frontage along Maxella Avenue, an Avenue III with a posted speed limit of 25 miles per hour, and Glencoe Avenue, a Collector with a posted speed limit of 25 miles per hour. Option A and Option B would enhance the pedestrian experience along these corridors, including at the Project Site access points, which would enhance connections to and from the numerous pedestrian destinations in the direct vicinity of the Project Site. As previously noted, Option A and Option B would be required to provide a 3-foot dedication along the Project Site, thereby providing opportunities for wider sidewalks and/or parkway areas on Maxella Avenue and Glencoe Avenue and also reduces the potential for vehicle/pedestrian conflicts at driveways. Excellent line of sight is provided for all modes of travel (motorists, pedestrians, and bicyclists) at the Project Site driveways under Option A and Option B. Sidewalks are provided along both the Project Site's Maxella Avenue and Glencoe Avenue frontages, and signalized crossings within convenient walking distance to the Project Site.

Neither Option A nor Option B would add site access points along the Project Site's Maxella Avenue frontage. Option A would remove one site vehicular site access point along the Project Site's Glencoe Avenue frontage and shift the existing northerly driveway along Glencoe Avenue 113 feet south, increasing the distance between the driveway and the Glencoe Avenue/Maxella Avenue intersection. Option B would reduce the number of curb cuts along the Project Site's Glencoe Avenue frontage from three to one, with the

southerly Glencoe Avenue Driveway to remain. The Project Site and surrounding area are in good physical condition and located on flat terrain. The physical condition of the Project Site and proposed entry/exit points would be improved by both Option A and Option B, therefore, the potential for vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts would be reduced. Neither Maxella Avenue nor Glencoe Avenue are noted in the City's High Injury Network. Given the existing physical conditions of the Project Site and planned reduction of curb cuts along Glencoe Avenue, no safety concerns related to geometric design are noted. The driveways would be designed to comply with LADOT standards. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. No security gates or other parking control features are proposed along the Project Site driveways in close proximity to the public right-of-way under Option A or Option B. Additionally, Project Site driveways would be designed and constructed to City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site. **Therefore, the Project (under both Option A and Option B) would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant.**

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

LADOT's Interim Guidance for Freeway Safety Analysis 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. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As identified in the Transportation Assessment, the Project would not add 25 or more trips to any nearby freeway off-ramp serving the Project Site in either the morning or afternoon peak hour. SR-90 is an at-grade roadway in the immediate vicinity of the Project Site, and the Mindanao Way/SR-90 westbound and Mindanao Way/SR-90 eastbound intersections are not considered to be freeway off-ramps. **Therefore, as there are no freeway off-ramps located in the vicinity of the Project Site, neither Option A nor Option B would add 25 or more trips to any nearby freeway off-ramps, and no further freeway safety analysis is required. As such, impacts regarding freeway safety would also be less than significant.**

Lastly, construction activities associated with the Project (both Options A and B) could temporarily reduce or alter pedestrian, bicycle and vehicular access and circulation,

temporarily increase traffic, and temporarily cause safety concerns for pedestrians, bicyclists and motorist in the study area. However, the construction of the Project would not require the closure of any vehicle travel lanes due primarily to the availability of parking "lanes" adjacent to the Project Site on Glencoe Avenue which precludes the need to use the adjacent travel lanes (there may be limited instances, lasting a few hours per occurrence, during the course of construction of the Project, such as utility work within the street on Glencoe Avenue and/or Maxella Avenue, that require the use of traffic control devices, such as traffic safety cones, to slightly modify vehicular traffic flow and/or the use of flaggers to maintain two-way traffic flow on these streets, but these would be provided as discussed further below). Additionally, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. It is also noted that construction of the Project would generate significantly fewer trips than the existing uses on the Project Site, thereby offsetting construction-related trips for development of the Project. Furthermore, there are no existing bike paths along the Project Site's Maxella and Glencoe Avenue frontages, so Project construction activities would not result in the temporary closure of any existing bike paths. Lastly, as required by Project Design Feature TR-PDF-1, an LADOT-approved Construction Stating and Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during the construction period. Among other things, these plans would: identify the location of any temporary street parking or sidewalk closures; show traffic/bus detours, haul routes, and hours of operation; provide for the posting of signs advising transit riders and pedestrians of temporary sidewalk closures and providing alternative routes; provide for the installation of other construction-related warning signs; show access to abutting properties; control truck and vehicle access to the Project Site with flagmen; provide traffic cones and other required traffic control devices; limit temporary sidewalk and lane closures to the maximum extent practical; and schedule construction material deliveries during off-peak periods to the extent practical. These measures would minimize impacts to pedestrian, bicycle and pedestrian circulation during the construction period and maximize safety. **For all these reasons, Project construction activities would not result in significant safety impacts to pedestrians, bicyclists and motorists, and Project construction-related transportation safety impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to hazards due to a geometric design feature or incompatible uses would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to hazards due to a geometric design feature or incompatible uses were determined to be less than significant without mitigation.

Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction Impacts

Construction activities associated with the Project (both Options A and B) could potentially impact the provision of emergency services by the Los Angeles Fire Department (LAFD) and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of reduced or altered access around the Project Site. Construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities could temporarily affect emergency response for emergency vehicles along Lincoln Boulevard and other main connectors due to traffic during the Project's construction phase. However, the construction of the Project would not require the closure of any vehicle travel lanes. This is due primarily to the availability of parking "lanes" adjacent to the Project Site on Glencoe Avenue, which precludes the need to use the adjacent travel lanes. There may be limited instances, lasting a few hours per occurrence, during the course of construction of the Project, such as utility work within the street on Glencoe Avenue and/or Maxella Avenue, that require the use of traffic control devices, such as traffic safety cones, to slightly modify vehicular traffic flow and/or the use of flaggers to maintain two-way traffic flow on these streets. This work would be temporary in nature (e.g., during daytime hours over the course of one or a few days) and would be coordinated under review and approval with the appropriate City agencies, as needed. Additionally, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. It is also noted that construction of the Project would generate significantly fewer trips than the existing uses on the Project Site, thereby offsetting construction-related trips for development of the Project. Furthermore, as set forth above in Project Design Feature TR-PDF-1, the Project Applicant would prepare and submit a Construction Staging and Traffic Management Plan to LADOT for review and approval prior to the start of construction which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Based on the above, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.

(b) Operational Impacts

As described in Section II, Project Description, of this Recirculated Draft EIR, vehicular access to the Project Site under both Options A and B is proposed to be provided via one or more driveways off Ocean Way, Maxella Avenue and Glencoe Avenue. As discussed in Section IV.J.1, Public Services—Fire Protection, of this Recirculated Draft EIR, under either Project option, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Additionally, as set forth in Project Design Feature POL-PDF-6 included in Section IV.J.2, Public Services—Police Protection, of this Recirculated Draft EIR, prior to the issuance of a building permit, the Applicant would consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines. Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-7 in Section IV.J.2, Public Services—Police Protection, of this Recirculated Draft EIR. As such, under either Project option, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Additionally, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

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

(2) Mitigation Measures

Project-level impacts related to emergency access would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As discussed in the Transportation Assessment, a forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the Project can be evaluated within the context of the cumulative impact of all ongoing development. Identification of related projects was based on information on file at LADOT, City of Culver City Planning Department, and County of Los Angeles Department of Regional Planning within a 0.75-mile radius (0.25 mile past the farthest outlying study intersection) of the Project Site. The list of related projects in the Project Site area is presented in Table III-1 and their locations are shown in Figure III-1 in Section III, Environmental Setting, of this Recirculated Draft EIR. As indicated therein, 14 related projects in the planning or development stages in the study area were identified, including nine in the City of Los Angeles, four in the City of Culver City, and one in incorporated Los Angeles County. The closest related projects to the Project Site are Related Project 7 (Stella Phase 2, residential, 13488 W. Maxella Avenue), located one-half block west of the Project Site; Related Project 1 (X67 Lofts, residential and office, 4140 S. Glencoe Avenue), located one half block north of the Project Site; and Related Project 2 (C1 by CLG, residential and office, 4210 S. Del Rey Avenue), located one block north of the Project Site. It is noted that some of the related projects may not be built out by 2027 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that all of the related projects are fully built out by 2027.

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

Per Section 2.1.4 of the TAG, the analysis of cumulative consistency requires consultation and confirmation with the City of Los Angeles Department of City Planning and LADOT. As with Project Option A and Option B, the related projects would include adequate bicycle facilities and include high density urban uses in proximity to the nearby multimodal transportation facilities. It is also noted that the Stella Phase 2 project, located adjacent to the Project Site at 13488 Maxella Avenue, has been completed and did not result in any substantial changes to circulation conditions. The related projects, as with Option A and Option B, would not conflict with adjacent street designations and classifications. No street widenings would be necessary for these projects. Accordingly, there would be no significant cumulative impacts to which Option A and Option B, as well as other nearby related projects contribute to regarding transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. Overall, implementation of the Project, together with the related projects, would not create inconsistencies with the Mobility Plan and Community Plan. The related

projects primarily propose high-density residential, office, and commercial uses in an area with good transit connectivity, reducing dependence on automobiles and encouraging more active travel modes. In addition, similar to the Project, it is anticipated that none of the related projects would preclude future Vision Zero Safety Improvements by the City. As with the Project, each related project would also include the required number of bicycle parking spaces in accordance with LAMC requirements and would not conflict with the City's TDM Ordinance.

Based on the above and conclusion in the preceding Project-level analysis under Threshold (a), the guiding language contained in the City's TAG, and review of related projects in the immediate Project Site vicinity, there would be no cumulative inconsistency with the City's transportation-related plans, policies, ordinances and programs. In addition, neither Option A nor Option B include features that would preclude the City from completing and complying with the applicable guiding documents discussed above and policy objectives on a Citywide basis. **Therefore, Project impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

As stated in Section 2.2.4 of the City's TAG, analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the preceding Project-level VMT analysis. Long-term, or cumulative, effects are determined through a consistency review with the SCAG RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as discussed in the TAG, for projects that do not demonstrate a significant impact based on an efficiency-based significance threshold (i.e., VMT per Capita or VMT per employee), the determination that a project would individually have a less-than-significant VMT impact is sufficient to demonstrate there would be no cumulatively significant VMT impact associated with the project and the relevant related projects. This is because projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.

Based on the Option A related VMT analysis and conclusion in the preceding Project-level VMT analysis under Threshold (b), Option A would fall under the City's efficiency-based significant impact thresholds, and thus are already shown to align with the

long-term VMT and GHG reduction goals of SCAG's RTP/SCS. **Therefore, Option A would not contribute considerably to cumulative VMT impacts, and thus the cumulative impact would be less than significant.**

As discussed in the preceding Project-level VMT analysis under Threshold (b) for Option B, it was concluded that with implementation of Mitigation Measure TR-MM-1 and Mitigation Measure TR-MM-2, the Option B VMT impact would be reduced to less than significant. **Therefore, Option B would not contribute considerably to cumulative VMT impacts, and thus the cumulative impact would be less than significant.**

(c) Hazardous Design Features or Incompatible Use

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 discussed above, the nearest related project to the Project Site is Related Project 7, the Stella Phase 2 project, which has already been completed. Therefore, the Project and Related Project 7 could not combine to create significant impacts along the same access points. Additionally, as previously discussed in the preceding Project-level analysis under Threshold (c), the roadways adjacent to the Project Site and in the overall study area are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. Any modifications to the street system proposed as part of the Project and related projects would be reviewed by LADOT to ensure that such modifications do not create dangerous travel conditions. As summarized in Section III, Environmental Setting, of this Recirculated Draft EIR, the related projects comprise a variety of uses, including condominiums, retail, restaurant, residential, hotel and office uses and mixed-use developments incorporating some or all these elements. As with the Project, such uses would be consistent with the surrounding uses in the vicinity of the Project Site and would not introduce any hazards onto or adjacent to the study area. Additionally, as with the Project, the design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and LADOT during the City's plan review process to ensure all applicable building design requirements are met, and like the Project, each of the related projects would be required to implement a construction management plan during construction to avoid hazardous transportation conditions during the construction period. **Thus, no cumulative impacts related to increased hazard due to a design feature, incompatible use would occur.**

With regard to LADOT's interim guidance related to freeway safety analysis, as evaluated above, the Project would result in less than significant impacts related to freeway safety. **Therefore, Project impacts related to freeway safety would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(d) Inadequate Emergency Access

As with the Project as discussed in the preceding Project-level analysis under Threshold (d), any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the study area and would not be concentrated to a specific location. Also, as previously discussed, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, as with the Project, the related projects would not result in inadequate emergency access. **As such, cumulative impacts to emergency access would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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