

IV. Environmental Impact Analysis

I. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential transportation/traffic impacts. This section is based on the Transportation Assessment for the 656 South San Vicente Medical Office Project (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated November 2020 and included as Appendix J-1 of this Draft EIR. The Transportation Assessment was prepared in accordance with the Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG) adopted in July 2020 and pursuant to a memorandum of understanding (MOU) with LADOT, dated February 25, 2020, documenting its assumptions and technical methodologies. The LADOT MOU is included in Appendix A of the Transportation Assessment. LADOT approved the Transportation Assessment on December 9, 2020, which is included as Appendix J-2 of this Draft EIR.

2. Environmental Setting

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include:

- Americans with Disabilities Act of 1990
- 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
- Wilshire Community Plan
- City of Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines

- LADOT Manual of Policies and Procedures Section 321
- Vision Zero Los Angeles 2015–2025
- Citywide Design Guidelines

a) Regulatory Framework

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, 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 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

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

(b) Assembly Bill 32 and Senate Bill 375

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (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 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 eight years in conjunction with the revision schedule of housing and transportation elements.

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

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-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% 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 Senate Bill (SB) 743, which went into effect on January 1, 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (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 had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes Vehicle Miles Travelled (VMT) as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

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

(e) *CEQA Guidelines Section 15064.3*

As discussed above, recent changes to CEQA include the adoption of CEQA Guidelines Section 15064.3, Determining the Significance of Transportation

Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.^{1,2} Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.3 (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 Transportation Assessment Guidelines.

(3) Regional

(a) *Southern California Association of Governments 2020–2045 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 Connect SoCal 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 greenhouse gas reduction targets set by the California Air Resources Board (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 towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

¹ “Major transit stop” is defined in Public Resources Code 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.

² “High-quality transit corridors” are defined in Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

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 four percent of SCAG’s total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within one half 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 a half mile of a major transit stop that is existing or planned. Job centers are defined as areas with significant 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. Connect SoCal 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 five percent reduction in VMT per capita, nine percent reduction in vehicle hours traveled, and a two 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, 2016.³ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how

³ City of 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.

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

- Arterial Streets – Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
 - Avenues pass through both residential and commercial areas and include three categories, Avenue I, Avenue II, 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.
 - 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, Transit Enhanced Network, Vehicle Enhanced Network, and Neighborhood Enhanced Network. In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts.

(b) *Wilshire Community Plan*

The Project Site is located within the boundaries of the Wilshire Community Plan. The Plan was adopted in 2001 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.⁴ The Plan includes the following transportation and circulation objectives and policies that are applicable to the Project:

- Improving the function, design, and economic vitality of commercial areas.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Improving the quality of the built environment through design guidelines, streetscape improvements and other physical improvements which enhance the appearance of the community.

A Transportation Improvement and Mitigation Program (TIMP) was prepared for the Wilshire Community Plan. The TIMP establishes a program of specific measures to reduce land use impacts on transportation to be undertaken during the life of the Plan. The TIMP provides an implementation program, which consists of recommendations related to street reclassifications, transit improvements, non-motorized transportation, transportation demand management (TDM) strategies, transportation systems management (TSM) Strategies, residential neighborhood protection plans, parking, and capital Improvements.

(c) *City of 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.

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

⁴ City of Los Angeles Department of City Planning, Wilshire Community Plan, adopted September 19, 2001.

various uses. LAMC Section 12.21 A.16 also includes facility requirements, design standards and siting requirements for bicycle parking.

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

(d) *LADOT Transportation Assessment Guidelines*

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, travel demand model and transportation impact thresholds based on vehicle miles traveled, pursuant to State CEQA Guidelines Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the Transportation Assessment Guidelines (TAG) that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. 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 Mobility Plan 2035. 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.⁵

(e) *LADOT Manual of Policies and Procedures Section 321*

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

⁵ Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2020.

(f) *Vision Zero Los Angeles 2015–2025*

The Vision Zero Los Angeles 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, which has a higher incidence of severe and fatal collisions. The High Injury Network, 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.

(g) *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.

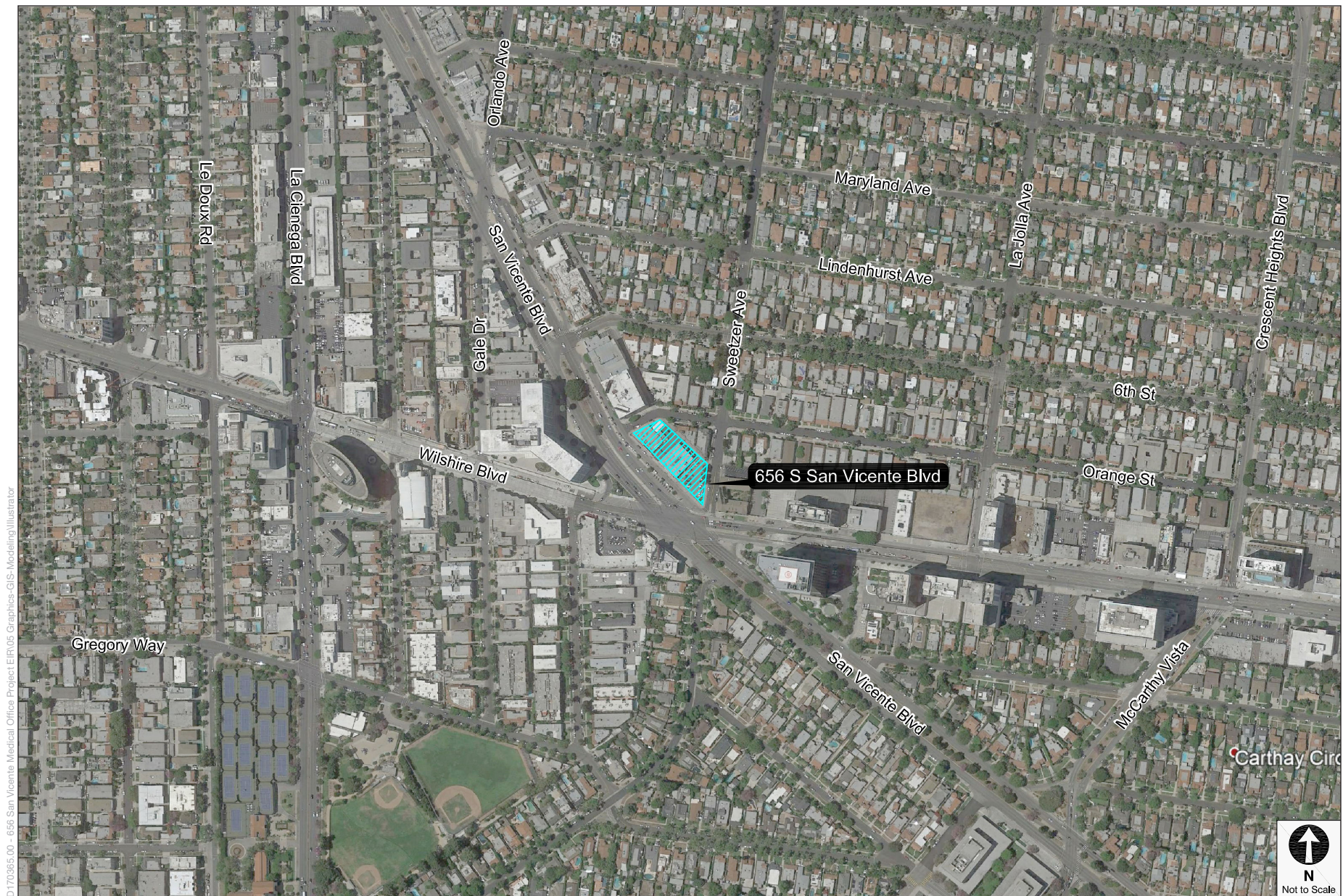
b) Existing Conditions

The following discussion describes key streets and transit routes serving the Project Site, along with other development and infrastructure projects that could affect the Study Area (the geographic area analyzed in the Transportation Assessment) prior to the completion of the project.

(1) Street System

The existing street system in the Study Area consists of a regional roadway, including freeways, avenues, and collector and local streets that provide regional, sub-regional, and local access and circulation within the Study Area.

The Project Site is located in the Beverly Grove neighborhood and adjacent to Miracle Mile within the Wilshire Community Plan area of the City of Los Angeles. The Project Site includes a geographical area generally bounded by Orange Street to the north, a public alleyway and South Sweetzer Avenue to the east, Wilshire Boulevard to the south, and the frontage road of South San Vicente Boulevard to the west. **Figure IV.I-1, Local Roadway Network**, illustrates the local roadway network. The streets in the Project vicinity are mostly under the jurisdiction of the City of Los Angeles, with the exception of La Cienega Boulevard, which is under the jurisdiction of the City of Beverly Hills in the Project vicinity. Freeways are under the jurisdiction of Caltrans.



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SOURCE: Gibson Transportation Consulting, Inc., 2020

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Figure IV.I-1
Local Roadway Network

(a) *Freeways*

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10), the Hollywood Freeway (US-101), and the San Diego Freeway (I-405). In the Project vicinity, I-10, located approximately two miles south of the Project Site, runs in westbound/eastbound directions, extends from Santa Monica to Jacksonville, Florida, and has four lanes in each direction in the Project vicinity. The nearest interchange is located at La Cienega Boulevard.

(a) *Roadways*

The characteristics of the major roadways in the Project vicinity are described below.

(i) *East/West Roadways*

6th Street is a designated Collector Street that runs in the east-west direction and is located north of the Project Site. It provides two travel lanes, one in each direction. Two-hour unmetered parking is generally available on the north side of the street. Permit parking is generally available on the south side of the street. 6th Street is included in the NEN in Mobility Plan 2035.

Orange Street is a designated Local Street that runs in the east-west direction and is located along the northern boundary of the Project Site. It provides two travel lanes, one in each direction. It would provide direct access to the Project's proposed employee driveway and loading dock. Two-hour metered, unmetered, and permit parking is generally available on both sides of the street.

Wilshire Boulevard is a designated Avenue I that runs in the east-west direction and is located along the southern boundary of the Project Site. It provides four travel lanes, two in each direction, with a bus lane on the south side of the street, a center turn lane, and left-turn lanes at intersections. Generally available on both sides of the street is 30-minute and one-hour metered parking. Wilshire Boulevard is included as a BLN Tier 2 bicycle facility east of San Vicente Boulevard, and is also included in the TEN and PED in Mobility Plan 2035.

(ii) *North/South Roadways*

San Vicente Boulevard is a designated Boulevard II that runs in the north-south direction and is located along the western boundary of the Project Site. It provides six travel lanes, three lanes in each direction, and left-turn lanes at intersections. Additionally, a one-way northbound frontage road with one travel lane runs adjacent to the east side of San Vicente Boulevard, and would provide direct access to the Project's proposed inbound and outbound visitor driveways. Metered parking is available on both sides of the South San Vicente Boulevard frontage road along the Project Site frontage, with two-hour and 10-hour metered parking on the west side of the street and one-hour metered parking on the east side of the street. Two-hour metered parking is generally available on the west side of San

Vicente Boulevard north of Wilshire Boulevard. Unmetered parking is generally available on the northeast side of the street and two-hour metered parking with restrictions and permit parking is generally available on both sides of San Vicente Boulevard south of Wilshire Boulevard. Wilshire Boulevard is included as a BEN Tier 1 bicycle facility, and is also included in the PED in Mobility Plan 2035.

Sweitzer Avenue is a designated Collector Street that runs in the north-south direction and is located along the eastern boundary of the Project Site. It provides two travel lanes, one in each direction. Two-hour metered and unmetered parking is generally available on both sides of the street. Sweitzer Avenue is included in the NEN in Mobility Plan 2035.

La Jolla Avenue is a designated Local Street that runs in the north-south direction and is located east of the Project Site. It provides two travel lanes, one in each direction. Two-hour metered and permit parking is generally available on the east side of the street. Two-hour unmetered parking is generally available on the west side of the street. La Jolla Avenue is included in the NEN in Mobility Plan 2035.

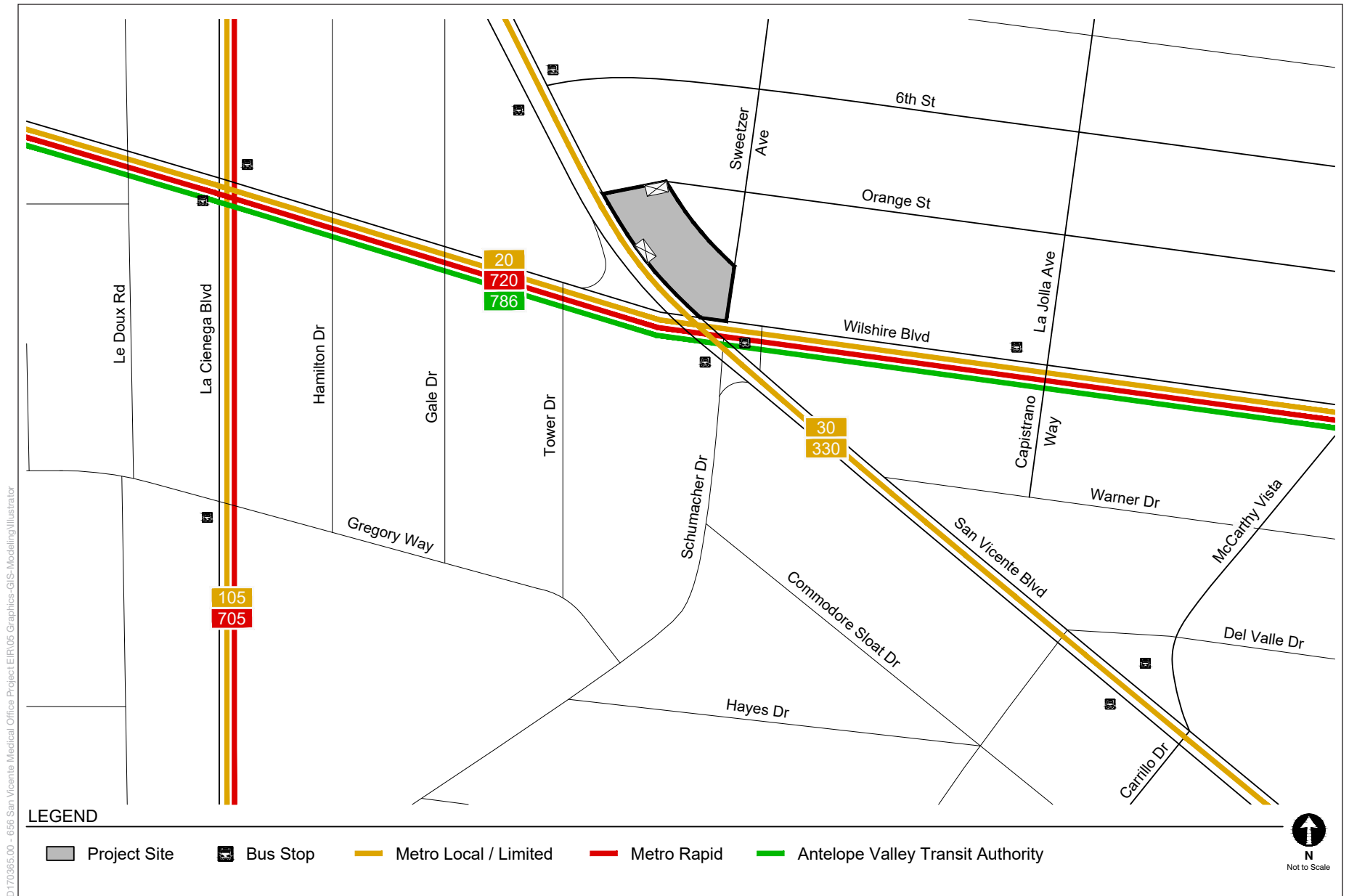
McCarthy Vista is a designated Avenue III that runs in the north-south direction and is located east of the Project Site. It provides four travel lanes, two in each direction, and left-turn lanes at intersections. The roadway becomes Carrillo Drive south of San Vicente Boulevard. Two-hour unmetered parking is generally available on the east side of the street. McCarthy Vista is included in the NEN in Mobility Plan 2035.

Carrillo Drive is a designated Collector Street that runs in the north-south direction and is located southeast of the Project Site. It provides four travel lanes, two in each direction, and left-turn lanes at intersections. The roadway becomes McCarthy Vista north of San Vicente Boulevard. One-hour unmetered parking is generally available on the west side of the street and is available on the east side of the street with peak hour restrictions. Carrillo Drive is included in the NEN in Mobility Plan 2035.

(2) Public Transit

The Project Site is served by several bus lines operated by Metro and Antelope Valley Transit Authority (AVTA). **Figure IV.I-2, Existing Transit Service**, shows the various transit lines providing service in the Project vicinity, while **Table IV.I-1, Existing Transit Service**, details the transit service near the Project Site. Three Metro bus lines (30/330, 20/720, and 105/705), and one AVTA Commuter Service bus line (786) serve the area and are described below.

Metro Line 20 provides local service between Downtown Los Angeles and Santa Monica. This line runs south of the Project Site along Wilshire Boulevard. Line 20 has average weekday peak hour headways of 11 to 13 minutes.



SOURCE: Gibson Transportation Consulting, Inc., 2020

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Figure IV.I-2
Existing Transit Service

**TABLE IV.I-1
EXISTING TRANSIT SERVICE**

Transit Route	Operator	Service Type	Service From	Via	Weekday Headways	
					A.M.	P.M.
20	Metro	Local	Downtown to Santa Monica	Wilshire Boulevard	11–13 mins.	12 mins.
30	Metro	Local	East LA to West Hollywood	San Vicente Boulevard	30 mins.	30–34 mins.
105	Metro	Local	Vernon to West Hollywood	La Cienega Boulevard	18–20 mins.	18–20 mins.
330	Metro	Limited	Downtown to West Hollywood	San Vicente Boulevard	30 mins. ^a	30 mins. ^a
705	Metro	Rapid	Vernon to West Hollywood	La Cienega Boulevard	13–20 mins.	16-17 mins.
720	Metro	Rapid	Downtown to Santa Monica	Wilshire Boulevard	3–10 mins.	4–10 mins.
786	AVTA	Express	Lancaster/Palmdale to Hollywood	Wilshire Boulevard	15–20 mins.	24 mins.

^a Headways for the limited service transit route are for the two to three stops made during the A.M. and P.M. peak hour provided by this transit route.

SOURCE: Gibson Transportation Consulting, Inc., 2020.

Metro Line 30/330. Line 30 provides local service between East Los Angeles and West Hollywood via Downtown Los Angeles. This line runs west of the Project Site along South San Vicente Boulevard. Line 30 has average weekday peak hour headways of 30 minutes. Line 330 provides supplemental limited peak period service along the Downtown Los Angeles to West Hollywood segment of the route, with between two and three additional trips in each travel direction.

Metro Line 105/705. Line 105 provides local service between Vernon and West Hollywood. The line runs west of the Project Site along La Cienega Boulevard. Line 105 has average weekday peak hour headways of 18 to 20 minutes. Metro Rapid Line 705 provides express service (i.e., fewer stops) along the same route with average peak hour headways of 13 to 20 minutes.

Metro Rapid Line 720 provides express service between Commerce and Santa Monica via Downtown Los Angeles. This line runs south of the Project Site along Wilshire Boulevard. Line 720 has weekday peak hour headways of three to 10 minutes.

AVTA Line 786 provides express service between Lancaster/Palmdale and Hollywood via Century City/West Los Angeles. This line runs south of the Project Site along Wilshire Boulevard. Line 786 operates during the weekday peak periods only, with headways of between 15 and 24 minutes.

(3) Bicycle and Pedestrian Facilities

(i) *Bicycle Facilities*

As indicated in the 2010 Bicycle Plan, the existing bicycle system consists of a limited network of bicycle lanes (Class II), bicycle routes (Class III), and protected bicycle lanes (Class IV). Class II bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. Class III bicycle routes are those where motorists and cyclists share the roadway and there is no separated striping for bicycle travel. Class IV protected bicycle lanes provide exclusive bicycle infrastructure such as cycle tracks, bicycle traffic signals, and demarcated areas to facilitate turns at intersections and along neighborhood streets. There are no Class III or Class IV bicycle facilities located in the Project vicinity. Class II bicycle lanes are provided along South San Vicente Boulevard north of Wilshire Boulevard.

(ii) *Pedestrian Facilities*

The 10-foot sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks provide connectivity to marked crosswalks at study intersections. The signalized intersection of South San Vicente Boulevard and Wilshire Boulevard provides pedestrian phasing, crosswalk striping, and

Americans with Disability Act (ADA)-compliant wheelchair ramps, and provides direct connectivity to the Project Site.

(4) Vision Zero

The Project Site is not located adjacent to any streets identified in the HIN and no other streets within the Project's local roadway network, as illustrated in Figure IV.I-1, above, are identified in the HIN. Outside of the Project's local roadway network, Vision Zero has identified 3rd Street, located approximately 0.5 miles north of the Project Site, and Fairfax Avenue north of Wilshire Boulevard and Wilshire Boulevard east of Fairfax Avenue, located approximately 0.65 miles east of the Project Site, as part of the HIN.

(5) Parking and Site Access

The Project Site includes surface parking areas located between the two existing building and on the southeastern portion of the Project Site fronting the frontage road of South San Vicente Boulevard and South Sweetzer Avenue. All parking areas are accessible from driveways located along the frontage road of South San Vicente Boulevard and the alley.

c) Future Traffic Context

(1) Related Projects

The Transportation Assessment, consistent with the requirements provided in the TAG, also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects was compiled based on information from the Department of City Planning and LADOT, as well as recent studies of projects in the area. In total, 18 related projects were identified in the vicinity of the Project Site (17 in the City of Los Angeles and one in the City of Beverly Hills). Table 4 in the Transportation Assessment, as provided in Appendix J-1 of this Draft EIR. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, and notwithstanding that some may not be approved or developed, all related projects were considered.

(2) Future Transportation Improvements

The Metro Purple Line Extension is currently under construction and the proposed Wilshire/La Cienega Metro Purple Line Station, which is located within 1,500 feet of the Project Site, is anticipated to be operational in 2023.⁶

⁶ Los Angeles County Metropolitan Transportation Authority (Metro), FAQ, <https://www.metro.net/projects/westside/faq-westside/>, accessed April 9, 2020.

(3) Future Bicycle Facilities

Mobility Plan 2035, which incorporates components of the 2010 Bicycle Plan, identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. 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, and a bicycle path is a bicycle facility outside of the roadway. Planned Tier 1 facilities in the Project vicinity include South San Vicente Boulevard. Planned Tier 2 facilities in the Project vicinity include Wilshire Boulevard, east of South San Vicente Boulevard. There are no Tier 3 facilities planned in the Project vicinity.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds,⁷ a project would have a significant impact related to transportation if it would:

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

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

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

Threshold (d): Result in inadequate emergency access.

In analyzing potential transportation impacts, the City has adopted the thresholds included in its CEQA Transportation Thresholds, which are the same as the impact questions included in Appendix G of the CEQA Guidelines. The City's CEQA Transportation Thresholds, along with the TAG, supersede the guidance and factors included in the City's 2006 L.A. CEQA Thresholds Guide. The impact criteria in the TAG are discussed below. With regard to emergency access, neither the TAG nor the City's CEQA Transportation Thresholds include specific factors or thresholds for determining potentially significant impacts. The methodology discussed below describes the City's standard considerations when assessing emergency access impacts.

⁷ City of Los Angeles, California Environmental Quality Act (CEQA) Transportation Thresholds, July 2019.

b) Methodology

In accordance with the TAG and in compliance with the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 and following), the CEQA-required analysis to be included within this section includes an assessment of whether the Project would result in: (1) potential conflicts with transportation-related plans, ordinances or policies; (2) a substantial increase in VMT; (3) increased hazards due to a geometric design feature or incompatible use; and (4) emergency access.

The scope of the analysis in the Transportation Assessment was developed in consultation with LADOT. The base assumptions and VMT technical methodologies were identified and agreed to in the LADOT-reviewed and approved MOU, which is included as Appendix A in the Transportation Assessment. The subsections below describe the methodologies to evaluate each significance threshold.

(1) Review for Conflicts with Plans, Programs, Ordinances, or Policies

With implementation of SB 743, the Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. CEQA Guidelines 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. The TAG, consistent with Appendix G of the CEQA Guidelines, also requires Project review for conflicts with transportation-related plans, programs, ordinances, or policies. For projects meeting the screening criteria set forth in Section 2.1-2 of the TAG, the analysis addresses whether the Project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities.

The City has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. Mobility Plan 2035 offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. Vision Zero Los Angeles aims to reduce transportation fatalities to zero by using extensive crash data analysis to identify priority corridors and intersections and applying safety countermeasures. The TAG indicates that these and other relevant City plans and policies, including new and revised plans that may be adopted over time, be consulted in order to identify potential conflicts with projects and plans in the CEQA review process.

The threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system (including

transit, roadways, bicycle, and pedestrian facilities) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that does not implement a particular program, plan, policy, or ordinance would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the City itself over time and over a broad area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies. Furthermore, if a conflict is identified in association with the Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given program, plan and policy would foreseeably result in a physical impact on the environment.⁸

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project area. The analysis considers whether there would be a significant impact to the environment to which both the Project and other projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located on the same block, were to preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework.

(2) VMT Analysis

A development project would have a potential impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. (refer to **Table IV.I-2, VMT Impact Criteria**)
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC) area in which the project is located. (refer to Table 2.2-1 of the TAG)
- For regional serving retail projects, the project would result in an increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criterion for office projects above.

⁸ The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182] (*Sequoyah Hills*)).

**TABLE IV.I-2
VMT IMPACT CRITERIA**

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

SOURCE: LADOT, Transportation Assessment Guidelines, Table 2.2-1, July 2019.

Per the TAG, work VMT per employee was estimated using the TMT tool for the Project. The Project does not include any residential uses and, therefore, it would not generate any household VMT. The VMT Calculator starts with Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition (2017) trip generation rates, but then implements the MXD (mixed-use) methodology from the USEPA and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model, which is calibrated to Los Angeles conditions, to adjust the trips for internalization, transit, and walkability. The VMT Calculator was calibrated based on local count data collected in the City. Further information regarding the methods used by the VMT Calculator to estimate daily trips and daily VMT is provided in the City's VMT Calculator Documentation report.⁹

The Project VMT impact is considered significant if any one (or all) of the Project land uses exceed the impact criteria identified above in Table IV.I-2, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered. The Project Site is located within the Central APC area, which has a VMT impact threshold (15 percent below the average) of 6.0 daily household VMT per capita and 7.6 daily work VMT per employee.

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 less than 50,000 square feet.¹⁰ Because the Project's retail uses (i.e., restaurant,

⁹ LADOT and City of Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020.

¹⁰ LADOT, Transportation Assessment Guidelines, July 2020, page 2-6, Footnote 14.

pharmacy) are less than 50,000 square feet, they are considered to be local-serving and would, therefore, not result in a significant VMT impact.

A Transportation Demand Management (TDM) Program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. The Project is committing to implementing a variety of TDM strategies as a project design feature (refer to Project Design Feature TRAF-PDF-1 below). The Project would be conditioned to include these TDM strategies as a requirement for approval of Project entitlements and the Project's Mitigation Monitoring Program (MMP) would include the project design feature to further ensure it is implemented by the Project. These strategies were included as part of the VMT analysis.

TDM reductions for the Project were estimated based on the California Air Pollution Control Officers Association (CAPCOA) research and methodologies as described in Quantifying Greenhouse Gas Mitigation Measures.¹¹

The cumulative analysis considers both short- and long-term Project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis described above. Cumulative effects are determined through a consistency check with the SCAG 2020–2045 RTP/SCS. The 2020–2045 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 2020–2045 RTP/SCS does not specify any development may indicate a significant impact on transportation. As the Project Site is in a location where the 2020–2045 RTP/SCS includes development, this does not apply to the Project. However, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of SCAG's 2020–2045 RTP/SCS.

¹¹ California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010.

(3) Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where Project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result.

The determination of significance shall be on a case-by-case basis, considering the following factors:

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

(4) Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

c) Project Design Features

The following project design features are applicable to the Project:

- **TRAF-PDF-1: Transportation Demand Management (TDM) Program.** The Applicant will implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation,

such as carpooling, taking transit, walking, and biking. The TDM Program will be subject to review and approval by the Los Angeles Department of City Planning and LADOT. The exact measures to be implemented will be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The strategies will include, at a minimum, the following:

- Bicycle facilities including short-term and long-term parking, and onsite lockers and showers in accordance with LAMC requirements;¹² and
 - Marketing and promotions, including a transportation information center, kiosks and/or other on-site measures, such as providing a Tenant Welcome Package (i.e., all new commercial tenants receive information on available alternative modes and ways to access destinations).
- **TRAF-PDF-2: Construction Traffic Management Plan.** Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate:
 - Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
 - As parking lane and/or travel lane closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
 - Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate.

¹² Ordinance No. 185,480 amends Sections 12.03, 12.21 and 12.26 of the Los Angeles Municipal Code to update the bicycle parking regulations.

- Scheduling deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
 - Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the Project Site will be off of the South San Vicente Boulevard frontage road.
 - Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
 - Advanced notification of temporary on-street parking removals and duration of removals along the South San Vicente Boulevard frontage road and Orange Street.
 - 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 the Los Angeles Fire Department (LAFD), as necessary.
- **TRAF-PDF-3: Construction Worker Parking Plan.** The Applicant will prepare a Construction Worker Parking Plan prior to commencement of construction to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate:
 - During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan will identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
 - Construction workers will not be permitted to park on street.
 - All construction contractors will be provided with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

d) Analysis of Project Impacts

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

(1) Impact Analysis

Based on guidance provided in the TAG, the following plans, policies, programs were determined relevant to the Project and are analyzed in this section: Mobility Plan 2035, Wilshire Community Plan, LADOT Manual of Policies and Procedures, Vision Zero, LAMC (various sections), Citywide Design Guidelines, and Mobility Hub Guide. The analysis below includes an analysis as to whether the Project would conflict with the plans, policies and programs determined to be applicable to the Project.

(a) *Mobility Plan 2035*

Mobility Plan 2035 includes numerous policies that are applicable to development associated with the Project. The Mobility Plan combines “complete streets” principles with the goals and objectives that define the City’s mobility priorities as it relates to Safety First; World Class Infrastructure; Access for All Angelenos; Collaboration, Communication, and Informed Choices; and Clean Environments and Healthy Communities.

Safety First. The Project would improve the South San Vicente Boulevard frontage road, Orange Street, and Sweetzer Avenue adjacent to the Project Site to provide pedestrian safety and refuge areas, including the addition of landscaped space for pedestrians. Improvements to the Project frontages would be designed to prioritize the safety of all vulnerable roadway users, including pedestrians, bicyclists, children, the elderly, and the mobility-impaired. Thus, the Project would “design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice” and would not conflict with the Safety First goal.

World Class Infrastructure. Vehicular access to the Project Site would be provided via separate ingress and egress visitor-only driveways located along the frontage road of South San Vicente Boulevard, and one employee-only driveway located along Orange Street, a designated Local Street. The driveways on the frontage road of South San Vicente Boulevard would only accommodate right-turn-in and right-turn-out maneuvers, while the driveway on Orange Street would accommodate both left-turn and right-turn in and out maneuvers. The driveways on the frontage road of South San Vicente Boulevard and Orange Street are located on an auxiliary road and a Local Street, respectively, so as not to disrupt the operations of the Arterial Streets adjacent to the Project. Additionally, the Project proposes a separate driveway along Orange Street for loading dock access. None of the Project driveways are proposed along a street identified as part of the Mobility Plan’s mobility-enhanced networks (e.g., Transit Enhanced Network, Neighborhood Enhanced Network, Bicycle Path Network, Bicycle Network, and Pedestrian Enhanced District). Thus, the Project would not preclude the implementation of future improvements of the Mobility Plan.

The Project would maintain the designated driveway, public right-of-way, and roadway width requirements to meet the goals and serve the long-term needs of the Mobility Plan. Further, the Project would include the installation of landscaped space and street trees along South San Vicente Boulevard, Orange Street, and Sweetzer Avenue to improve upon the pedestrian experience. As the Project would promote “a well-maintained and connected network of streets” and facilities to provide “Angelenos with the optimum variety of mode choices, the Project would not conflict with the World Class Infrastructure goal.

Access for All Angelenos. The Project would encourage multi-modal transportation alternatives and access for all travel modes to and from the Project Site by providing bicycle infrastructure onsite and developing a mixed-use project located within 0.25 miles walking distance to a Metro Rapid Bus stop (Metro 720) and future Wilshire/La Cienega Metro Purple Line Station, which is currently under construction and is anticipated to be operational in 2023.¹³ Further, the Project would comply with all ADA requirements to maintain accessibility to all pedestrian types and would provide direct connections to pedestrian amenities at adjacent intersections. Thus, the Project would not conflict with the Access for All Angelenos goal.

Collaboration, Communication, and Informed Choices. The Project would implement and promote TDM strategies to reduce the dependency on single-occupancy vehicles (refer to Project Design Feature TRAF-PDF-1). As part of the Project’s TDM Program, the Project would provide marketing materials on-site to make employees and visitors aware of alternative transportation options to promote the benefits of TDM. Thus, the Project would not conflict with the Collaboration, Communication, and Informed Choices goal.

Clean Environments and Healthy Communities. The Project is located in close proximity to multiple transit lines, including the future Wilshire/La Cienega Metro Purple Line Station, which is currently under construction and is anticipated to be operational in 2023,¹⁴ and would provide bicycle parking facilities and pedestrian connections within the Project Site, as well as direct connections to off-site pedestrian amenities. This would promote non-automobile travel to improve personal fitness and public health and reduce transportation-related impacts to the environment. Further, the Project would implement various TDM strategies to encourage reduced single-occupancy vehicle trips and support ways to reduce VMT per capita (refer to Project Design Feature TRAF-PDF-1). Therefore, the Project would not conflict with the Clean Environments and Healthy Communities goal.

Therefore, the Project would not conflict with the applicable transportation policies, standards or programs in Mobility Plan 2035.

¹³ Metro, FAQ, <https://www.metro.net/projects/westside/faq-westside/>, accessed April 9, 2020.

¹⁴ Metro, FAQ, <https://www.metro.net/projects/westside/faq-westside/>, accessed April 9, 2020.

(a) *Los Angeles Municipal Code*

LAMC Section 12.21 A.16, Case No. CPC-2016-4216-CA and Council File No. 12-1297-S1 detail the bicycle parking requirements for new developments. The proposed short-term and long-term bicycle parking would satisfy the LAMC requirement by providing a total of 716 bicycle parking spaces within the ground-level near the entrance of the building's lobby and as part of the Project's on-site parking facility.

LAMC Section 12.26 J, the TDM Ordinance, establishes trip reduction requirements for non-residential projects in excess of 25,000 square feet. The Project would incorporate TDM measures as part of the Project design aimed at encouraging use of alternative transportation modes in line with the requirements set forth in the TDM Ordinance (refer to Project Design Feature TRAF-PDF-1).

LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half- right-of-way standards consistent with the Mobility Plan. The Project would maintain the designated right-of-way and roadway width requirements to meet the goals and serve the long-term needs of the Mobility Plan and no Waivers of Dedication are requested at this time. Therefore, the Project would not conflict with applicable LAMC Sections.

(b) *Wilshire Community Plan*

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles, including the Wilshire Community Plan area in which the Project is located. The Project would not conflict with the Wilshire Community Plan as it would implement many policies to maintain the community's distinctive character, including promotion of multimodal transportation (e.g., walking, bicycling, driving, and taking public transit), improvements to site access and circulation along a central commercial corridor, and the creation of a mobility-friendly environment through active ground floor uses and pedestrian-oriented design. The Project would also provide opportunities for employment of the local workforce in an accessible location within close proximity to transit. Further, the Project would encourage the enhancement of the visual environment and provide pedestrian amenities along South San Vicente Boulevard.

The Project would implement a TDM Program that would encourage employees and patrons of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program (refer to Project Design Feature TRAF-PDF-1). The Project would also explore opportunities to provide enhancements for all travel modes to increase mobility, safety, amenities, and access. The Project may contribute toward signal improvements and crosswalk upgrades at adjacent intersections.

Therefore, the Project would not conflict with the applicable goals of the Wilshire Community Plan.

(a) *Vision Zero*

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The Project Site is not located adjacent to any streets identified in the High Injury Network. Outside of the Project's local roadway network, Vision Zero has identified 3rd Street, located approximately 0.5 miles north of the Project Site, and Fairfax Avenue north of Wilshire Boulevard and Wilshire Boulevard east of Fairfax Avenue, located approximately 0.65 miles east of the Project Site, as part of the HIN. The Project improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Therefore, the Project would not conflict with the implementation of future Vision Zero projects in the public right-of-way.

(b) *LADOT Manual of Policies and Procedures*

The LADOT Manual of Policies and Procedures provides plans and requirements for traffic infrastructure features in the City, including driveway design and placement guidelines, loading zones, roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes. The driveways and truck loading dock would be designed in accordance with the standards set forth in Manual of Policies and Procedures. The Project would not interfere with any of the policies and procedures contained in this document. Additionally, the Project would comply with all applicable LADOT design standards. Therefore, the Project would not conflict with the LADOT Manual of Policies and Procedures.

(c) *Citywide Design Guidelines*

The Citywide Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The design guidelines are organized around Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design. Note that the analysis for the 360-Degree Design and Climate-Adapted Design is provided in **Section IV.F, Land Use and Planning**, of this Draft EIR.

Pedestrian-First Design. The Project would include accessible sidewalks, pedestrian amenities, and vehicular access driveways designed in accordance with the City's design considerations. The Project would provide street trees and sidewalk plantings uniformly within the sidewalk to provide adequate shade, as well as a more comfortable environment for pedestrians. Further, the orientation of the Project design and active ground floor facilities would ensure that the Project actively engages with the street and its surrounding uses.

Therefore, the Project would not conflict with the Citywide Design Guidelines related to Pedestrian-First Design.

(d) *Mobility Hubs Reader's Guide*

The Mobility Hubs Reader's Guide provides guidance for enhancing transportation connections and multi-modal improvements in proximity to new or existing transit stations. It specifically focuses on enhancing bicycle connections, providing vehicle sharing services, improving bus infrastructure, providing real-time transit and wayfinding information, and enhancing walkability and pedestrian connections. The Project would implement many of the key features identified above, including LAMC-required short-term and long-term bicycle parking that both facilitates and encourages bicycling in and around the Project. Therefore, the Project would not conflict with the Mobility Hubs Reader's Guide.

Based on the above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

(2) Mitigation Measures

Impacts regarding whether the Project would conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding whether the Project would conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As explained in **Subsection IV.I.3.b), Methodology**, the City's VMT Calculator was used to determine the Project's VMT per employee based on Project characteristics, such as land uses, land use quantities, and TDM measures that are included as part of the Project (refer to Project Design Feature TRAF-PDF-1).

As estimated by the VMT Calculator, the Project would generate 7.5 work VMT per employee, which is below the threshold of significance for the Central APC of 7.6 work VMT per employee. The VMT Calculator outputs and additional details regarding the analysis are provided in Appendix J-1 of this Draft EIR. As previously

indicated, the Project is exempt from evaluation of the retail VMT, because the retail component is less than 50,000 square feet and considered local-serving. Thus, no further analysis is necessary.

The Project would generate VMT below the work VMT per employee significance threshold. Therefore, impacts would be less than significant.

(2) Mitigation Measures

Impacts related to VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

As discussed in **Section VI, Other CEQA Considerations**, and in the Initial Study (Appendix A) of this Draft EIR, the Project would not alter existing street patterns in the vicinity. There are no existing hazardous design features such as sharp curves or dangerous intersections on site or within the Project vicinity. All on-site roadway and site access improvements would be designed in compliance with applicable City standards. As such, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. **For these reasons, the Project would not result in a substantial increase in hazards due to a geometric design feature or incompatible uses. As determined in the Initial Study, no impact with respect to Threshold (c) would occur. No further analysis is required.**

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

As discussed in **Section VI, Other CEQA Considerations**, and in the Initial Study (Appendix A) of this Draft EIR, during construction, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan to ensure that adequate emergency access is maintained during construction. With regard to operation, the Project would maintain emergency access to and from the Project Site and in the surrounding area, provided that future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents; and Project Site

access and circulation plans would be subject to review and approval by the LAFD and LADOT, to ensure that access to the Project does not interfere with existing disaster routes. As such, the Project would not result in inadequate emergency access. **As determined in the Initial Study, impacts with respect to Threshold (d) would be less than significant. No further analysis is required.**

e) Cumulative Impacts

(1) Impact Analysis

In accordance with the TAG, the cumulative analysis considers any related projects located within 0.25 miles from the furthest analyzed study intersection and any transportation system improvements in the Project vicinity. Related projects located within 0.25 miles from the furthest analyzed study intersection include 17 land use projects (i.e., residential, school, museum, hotel) in Los Angeles and Beverly Hills, which are identified on Figure 8 and in Table 4 of the Transportation Assessment (refer to Appendix J-1 of this Draft EIR).¹⁵ Note that consistent with other published CEQA documents in the City of Los Angeles, if a question was scoped out in the initial study, a cumulative impacts analysis is not provided for those questions that were scoped out. As such, a cumulative analysis related to design hazards and emergency access is not required and is not provided below.

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

Each of the related projects considered in this cumulative analysis related to conflicting with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for consistency with applicable policies. Collectively, the Project and the related projects add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity. Therefore, the Project in combination with the related projects would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

(b) *Vehicle Miles Traveled*

According to the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. 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 the SCAG 2020–2045 RTP/SCS. As demonstrated in the Project-level VMT analysis above,

¹⁵ Note that the related projects listed in **Chapter III, Environmental Setting**, only encompass those related projects within 0.25 miles of the Project Site, based on the direction of the Department of City Planning, which differs from the expanded related projects list as required by the TAG adopted in July 2019.

the Project's work VMT per employee would be below the City's efficiency-based impact threshold and, as such, the Project's contribution to cumulative transportation VMT impacts would not be considerable. Furthermore, it is also acknowledged that as discussed in **Sections IV.A, Air Quality, Section IV.E, Greenhouse Gas Emissions**, and **Section IV.F, Land Use and Planning**, of this Draft EIR, the Project would not conflict with, applicable 2020–2045 RTP/SCS goals, actions and strategies to reduce GHG emissions. As such, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.

(c) *Conclusion*

Based on the above, the Project's contribution to transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts on transportation 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.

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