IV. Environmental Impact Analysis

J. Traffic, Access, and Parking

1. Introduction

This section provides an analysis of the Project's potential impacts on traffic, access, and parking. This section is based on the *Transportation Study for the 11750 Wilshire Boulevard Project* (Transportation Study) prepared by Gibson Transportation Consulting Inc., dated June 2014 (see Appendix J.1 of this Draft EIR) and the *Construction Traffic Analysis for the 11750 Wilshire Boulevard* (Construction Traffic Analysis) prepared by Gibson Transportation Consulting Inc., dated June 2014 (see Appendix J.3 of this Draft EIR). The Transportation Study follows the Los Angeles Department of Transportation (LADOT)'s *Traffic Study Policies and Procedures* (June 2013), which establishes the guidelines for determining the appropriate analysis methodologies and significance thresholds for a project. The scope of analysis for the Transportation Study was developed in consultation with LADOT staff and in consideration of input received during the public scoping process. The assumptions and technical methodologies were identified as part of the study approach and were outlined in a Memorandum of Understanding (MOU) dated November 27, 2013, which was reviewed and approved by LADOT in November 2013. A copy of the MOU is provided in Appendix A of the Transportation Study. LADOT reviewed and approved the Transportation Study prior to circulation of this Draft EIR. A copy of LADOT's Assessment Letter is included as Appendix J.2 of this Draft EIR.

The Transportation Study evaluates the potential for impacts caused by the Project on the street system surrounding the Project Site. The following analysis conditions are analyzed for the Project:

- Existing Conditions—The analysis of existing traffic conditions provides a basis for the assessment of existing and future traffic conditions with the addition of Project traffic. The Existing Conditions analysis includes a description of key area streets and highways, traffic volumes and current operating conditions, and transit service in the Project Site vicinity. Intersection turning movement counts for typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) peak periods were collected in October 2013. Fieldwork (lane configurations and signal phasing) for the analyzed intersections was conducted in October 2013.

- Existing With Project Conditions—LADOT requires an evaluation of project traffic impacts on the existing environment as part of a traffic impact analysis. This analysis projects the potential intersection operating conditions that could be expected if the Project were built given the existing street system and traffic volumes. In this scenario, the Project-generated traffic is added to the Existing Conditions traffic volumes.

- Future Without Project Conditions (2017)—This analysis projects the potential intersection operating conditions that could be expected as a result of regional growth and related project traffic in the vicinity of the Project Site by year 2017.[1] The Future without Project traffic conditions are projected by adding ambient traffic growth and projected traffic from related projects to existing conditions. This analysis provides the baseline conditions by which Project impacts are evaluated in the future at full Project buildout.

- Future Plus Project Conditions (2017)—This analysis projects the potential intersection operating conditions that could be expected if the Project were operational in the projected opening year (2017) by adding the Project traffic to the Future without Project Conditions (Year 2017) traffic volumes.

In 2013, the State of California enacted Senate Bill 743 (SB 743). Among other aspects, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously

[1] *The projected build-out year for the Project has evolved throughout the course of preparing this Draft EIR and the associated technical studies. The Project's Transportation Study (included in Appendix J of this Draft EIR), which was reviewed and approved by LADOT in November 2013, assumes that the Project would commence operations in 2017. However, as discussed in Section II, Project Description of this Draft EIR, the Project may not commence operations until 2020. Accordingly, an Extended Horizon Analysis with an adjusted build-out year has been prepared and is included in Appendix M of this Draft EIR. The Extended Horizon Analysis analyzes the potential environmental impacts of the Project under future conditions in 2020. As demonstrated in the Extended Horizon Analysis, traffic impacts would continue to be less than significant.*

developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the parking impact threshold in the *L.A. City CEQA Thresholds Guide*.

The Project is a residential infill development comprised of 376 multi-family dwelling units and an approximate 18,000 square foot publicly accessible open space area. The Project Site is located less than 0.5 mile from 13 bus lines, the majority of which provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project is located in a transit priority area as defined in Public Resources Code Section 21099.[2] As such, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Nonetheless, the analysis of parking is provided below for informational purposes.

2. Environmental Setting

a. Regulatory Framework

(1) Congestion Management Program

The Los Angeles County Congestion Management Program (CMP) is a state-mandated program enacted by the State legislature to address the increasing concern that urban congestion is affecting the economic vitality of the state and diminishing the quality of life in some communities. The CMP provides the analytical basis for transportation decisions through the Regional Transportation Improvement Program (RTIP) and the State Transportation Improvement Program (STIP).

Within Los Angeles County, Metro is responsible for planning and managing vehicular congestion and coordinating regional transportation policies. Metro prepared the *2010 Congestion Management Plan for Los Angeles County*, in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The program also seeks to propose transportation projects eligible to compete for state gasoline tax funds and to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel. Proposition 111, passed by the electorate in 1990, provides state gasoline tax revenue for transportation

[2] *Also refer to the City's ZIMAS System regarding the location of the Project Site within a Transit Priority Area. www.zimas.lacity.org, accessed April 19, 2016.*

improvements and requires cities, counties, and other eligible agencies to implement the requirements of the CMP.

The CMP requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. The CMP project traffic impact analysis (TIA) guidelines require that the traffic study analyze traffic conditions at all CMP arterial monitoring intersections where a project will add 50 or more trips during either the A.M. or P.M. weekday peak hours of adjacent street traffic. The nearest arterial CMP monitoring stations are located at the intersection of Sepulveda Boulevard and Wilshire Boulevard, approximately 1 mile east of the Project Site, and at the intersection of Bundy Drive and Santa Monica Boulevard, approximately 0.5 mile southwest of the Project Site.

The CMP TIA guidelines also require that a traffic study analyze traffic conditions at all CMP mainline freeway monitoring locations where a project will add 150 or more trips in either direction during either A.M. or P.M. weekday peak hours. (A freeway mainline is the freeway segment between the ramps.) If based on this criterion a traffic study identifies no facilities for study, then no further traffic analysis is required.

The CMP also requires that a transit system analysis be performed to determine whether a project adds demand exceeding the capacity of the transit system. For a description of the existing transit system in the Project area, refer to Section 2.b.2, Existing Transit System, above.

(2) Southern California Association of Government's 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy

As discussed in Section IV.G, Land Use, of this Draft EIR, the Southern California Association of Governments (SCAG)'s 2012–2035 Regional Transportation Plan/ Sustainable Communities Strategy (2012–2035 RTP/SCS), adopted in April 2012, presents a long-term transportation vision through the year 2035 for the six county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. Specific goals within the 2012–2035 RTP/SCS address: mobility and accessibility; travel safety and reliability; sustainability in the transportation system; productivity of the transportation system; environmental protection through the improvement of air quality and encouragement of active transportation; and the facilitation of transit and non-motorized transportation. The 2012–2035 RTP/SCS provides a basic policy and program framework for long-term investment in the regional transportation system in a coordinated, cooperative, and continuous manner. By law, transportation investments in the SCAG region that receive State or federal transportation funds must be consistent with the 2012–2035 RTP/SCS and must be included in the Regional Transportation Improvement Program (RTIP). Refer to Section IV.G, Land Use, of this Draft EIR for a discussion of the

Project's consistency with the RTP. As demonstrated therein, the Project would be consistent with applicable goals and principles set forth in the RTP.

(3) Los Angeles General Plan Framework Element and Mobility Plan 2035

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. As discussed in the Transportation Chapter therein, the goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999.

In August 2015, the City Council initially adopted Mobility Plan 2035, which is an update to the Transportation Element of the General Plan. The City Council readopted Mobility Plan 2035 in December 2015 and may consider additional amendments.[3] Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. Mobility Plan 2035 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. Refer to Section IV.E, Land Use, of this Draft EIR for a discussion of the Project's consistency with the Transportation Chapter of the Framework Element and Mobility Plan 2035.

(4) City of Los Angeles Municipal Code

(a) Construction Traffic

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

(b) Parking

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project is eligible for a density bonus pursuant to LAMC Section 12.22.A.25, the City's affordable housing

[3] *LA2B, City Planning Commission Hearing on Additional Amendments, https://la2b.org/, accessed April 14, 2016.*

ordinance enacted pursuant to Senate Bill (SB) 1818 signed by Governor Schwarzenegger in September 2004. LAMC Section 12.22.A.25 provides options for the provision of residential parking that supersede the parking requirements for new residential development set forth in Section 12.21(A)4 (Off-Street Automobile Parking Requirements) of the LAMC. The requirements set forth in Section 12.22.A25d(1) of the LAMC (commonly referred to as Density Bonus Parking Option 1) would be applicable to the Project's residential units. These requirements are as follows:

- 1.0 on-site parking space per residential dwelling unit with one bedroom or less; and
- 2.0 on-site parking spaces per residential dwelling unit with two to three bedrooms.

In addition, pursuant to Section 12.21.A4 of the LAMC, two automobile stalls are required per 1,000 square feet of office floor area for the existing office building. Pursuant to Section 12.24Y of the LAMC, the on-site office may also receive a 10 percent reduction in required parking because the Project Site is located less than 1,500 feet from a transit facility.

(5) West Los Angeles Transportation Improvement and Mitigation Specific Plan

The Project Site is located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP), adopted March 8, 1997. The WLA TIMP is the transportation Specific Plan for a broad area between the Hollywood Hills to the north, the City of Santa Monica boundary to the west, the City of Culver City boundary to the south, and the City of Beverly Hills boundary to the east. The WLA TIMP is intended to regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses, and promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies. The WLA TIMP is intended to provide a mechanism to fund specific transportation improvements that would mitigate transportation impacts generated by new development. A Transportation Impact Assessment process and fee has been established for new development on any lot in the R3 or less restrictive zone. However, the WLA TIMP exempts multi-family projects and local serving commercial uses from the Transportation Impact Assessment fee. The plan ensures that the public transportation facilities constructed with these funds will significantly benefit the area.

Projects subject to the WLA TIMP that generate over 100 P.M. peak-hour vehicle trips may also be required to execute a Covenant with the City to implement a transportation demand management program satisfactory to the Department of

Transportation which is substantially in conformance with the requirements outlined in the WLA TIMP. This requirement is intended to promote or increase work-related ridesharing and transit use, as well as bicycling, to reduce peak-hour vehicle trips. The WLA TIMP also is intended to promote area wide transit enhancement through additional transit lines, shuttles, transit centers and facilities which expedite transit flow. Finally, the WLA TIMP is intended to promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods. Project consistency with the WLA TIMP is discussed in the impact analysis below.

b. Study Area

A traffic analysis study area generally comprises those locations with the greatest potential to experience significant traffic impacts due to a project, as defined by the Lead Agency. In the traffic engineering practice, a study area generally includes those intersections that are:

- Immediately adjacent or in close proximity to a project site;
- In the vicinity of a project site that are documented to have current or projected future adverse operational issues; or
- In the vicinity of a project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections)

The Project study area was designed to ensure that all potentially significantly impacted intersections were analyzed, and the boundary of the study area was extended, as necessary, to confirm that there were no significant impacts at or outside the boundary of the study area by reviewing the Project traffic travel patterns. The following six study intersections were selected for analysis:

1. Westgate Avenue and Wilshire Boulevard (signalized)
2. Granville Avenue and Wilshire Boulevard (signalized)
3. Stoner Avenue and Wilshire Boulevard (two-way stop-controlled)
4. Barrington Avenue & Wilshire Boulevard (signalized)
5. Federal Avenue/San Vicente Boulevard and Wilshire Boulevard (signalized)
6. Barrington Avenue and Texas Avenue (signalized)

The following study street segments were selected for analysis:

1. Stoner Avenue north of Texas Avenue
2. Granville Avenue north of Texas Avenue
3. Texas Avenue east of Stoner Avenue

The locations of the study intersections and study street segments are shown in Figure IV.J-1 on page IV.J-9.

c. Existing Conditions

The area surrounding the Project Site is highly urbanized and includes a mix of low- to high-rise buildings containing a variety of land uses. High-density commercial, retail, and office uses front Wilshire Boulevard, generally transitioning to lower density multi-family residential neighborhoods to the north and south of the Wilshire Boulevard commercial corridor. To facilitate effective movement of vehicles throughout the Project area, a network of freeway and street facilities are spread throughout the study area.

The recently adopted Mobility Plan 2035 (January 2016) provides updates and revisions to the above street standards in an effort to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. The available facilities in the study area are defined as follows in Mobility Plan 2035:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Arterial Streets—Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
  - Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:
    - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 mph.
    - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.

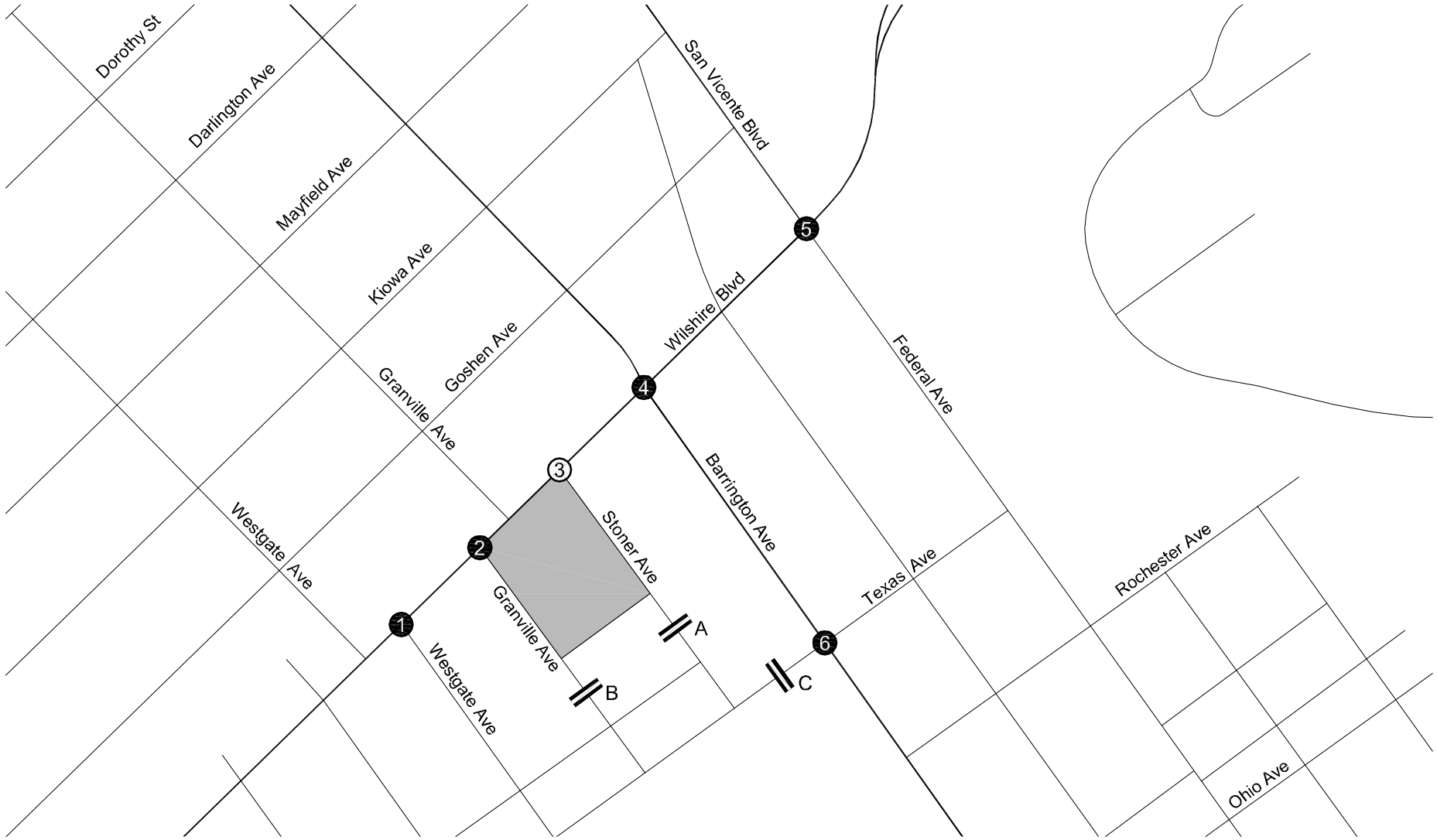

Figure IV.J-1
Location of Study Intersections and Street Segments

Source: Gibson Transportation Consulting, Inc., 2014.

- Avenues pass through both residential and commercial areas and include three categories:
    - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
    - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
    - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.

- Collector Streets—Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.

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

(1) Existing Street Systems

(a) Regional Transportation System (Freeways)

Primary regional access to the study area is provided by the I-405 (San Diego Freeway), which is described as follows:

- The I-405 (San Diego Freeway) generally runs in the north-south direction east of the study area and the Santa Monica Freeway (I-10), which generally runs in the east-west direction south of the study area. The I-405 is located approximately 1 mile to the east of the Project Site, with access provided via an interchange at Wilshire Boulevard and Sepulveda Boulevard. The I-10 is located approximately 1.5 miles south of the Project Site, with access provided via an interchange at Bundy Drive.

(b) Streets and Highways

The major highway providing regional and sub-regional access to the study area is Wilshire Boulevard. The following is a description of the major highway and major streets in the study area:

- Wilshire Boulevard—Wilshire Boulevard is a designated Boulevard II in Mobility Plan 2035. Wilshire Boulevard runs in the east-west direction and is located directly north of the Project Site.[4] It provides six travel lanes, three in each direction, and left-turn lanes at intersections. It provides both local and regional access to the Project Site. Metered parking is generally available with peak-hour restrictions on both sides of the street within the study area. The posted speed limit is 35 mph.

- Federal Avenue/San Vicente Boulevard—Federal Avenue/San Vicente Avenue runs in the north-south direction and changes name at Wilshire Boulevard. It is located east of the Project Site and provides four travel lanes, two in each direction, and left turns at signalized intersections. North of Wilshire Boulevard (San Vicente Boulevard) is a designated Avenue II in Mobility Plan 2035. South of Wilshire Boulevard (Federal Avenue) is a designated Collector Street in the Mobility Plan 2035. It provides both local and sub-regional access to the Project Site. Metered parking is generally available with peak-hour restrictions on both sides of the street within the study area. The posted speed limit is 30mph.

- Barrington Avenue—Barrington Avenue is a designated Avenue II in Mobility Plan 2035. Barrington Avenue runs in the north-south direction and is located east of the Project Site. It provides two travel lanes, one in each direction for the majority of the street length and widens to four lanes, two in each direction closer to Wilshire Boulevard. It provides both local and sub-regional access to the Project Site. Metered parking is generally available on both sides of the street within the study area. The posted speed limit is 30 mph.

- Westgate Avenue—Westgate Avenue is a designated Collector Street in the Mobility Plan 2035. Westgate Avenue runs in the north-south direction and is located west of the Project Site. It provides two travel lanes, one in each direction. It provides limited local access to the Project Site. Parking is available on both sides of the street within the study area with limited metered parking available closer to Wilshire Boulevard. The posted speed limit is 25 mph.

- Granville Avenue—Granville Avenue is a designated Local Street in the Mobility Plan 2035. Granville Avenue runs in the north-south direction and is located adjacent to the west side of the Project Site. It provides two travel lanes, one in each direction. It provides limited local access to the Project Site. Parking is available on both sides of the street within the study area with limited metered parking available closer to Wilshire Boulevard. The posted speed limit is 25 mph.

[4] *Mobility Plan 2035, which was adopted in August 2015 as an update to the General Plan Transportation Element, revised the designation along Wilshire Boulevard from Major Highway Class II to Boulevard II.*

- Stoner Avenue—Stoner Avenue is a designated Local Street in the Mobility Plan 2035. Stoner Avenue runs in the north-south direction and is located adjacent to the east side of the Project Site. It provides two travel lanes, one in each direction. It provides limited local access to the Project Site. Parking is available on both sides of the street within the study area with limited metered parking available closer to Wilshire Boulevard. The posted speed limit is 25 mph.

- Texas Avenue—Texas Avenue is a designated Collector Street in the Mobility Plan 2035. Texas Avenue runs in the east-west direction and is located to the south side of the Project Site. It provides two travel lanes, one in each direction. It provides limited local access to the Project Site. Parking is generally available on the north side of the street and there is no stopping allowed from 7:00 A.M. to 5:00 P.M. on the south side of the street within the study area to assist with school operations. The posted speed limit is 25 mph.

(c) Existing Traffic Volumes and Operating Conditions

(i) Signalized Intersections

As required by LADOT, existing traffic levels at the signalized study intersections under the jurisdiction of the City of Los Angeles (City) were evaluated using the Critical Movement Analysis (CMA) methodology, which determines volume-to-capacity (V/C) ratios. The overall intersection V/C ratio is subsequently assigned a level of service (LOS) value to describe intersection operations. LOS is a qualitative measure used to describe traffic flow conditions. Table IV.J-1 on page IV.J-13 provides LOS definitions for signalized intersections, which range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F.

Intersection turning movement counts were collected as part of the Transportation Study and analyzed using the CMA methodology described above to determine the existing operating conditions at the study intersections. The calculation is expressed in a V/C ratio for critical movements where the volumes at the intersection are compared to the capacity of the intersection. The intersection turning movement counts were conducted during the typical weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) commuter peak periods. Counts for the six study intersections were collected in October 2013. Public and private schools were in session at the time the traffic counts were conducted.[5] As discussed in Section II, Project Description, of this Draft EIR, the existing supermarket on the Project Site was vacant at the time of the traffic counts. Thus, the

[5] *Figure 4 in the Transportation Study included in Appendix J.1 of this Draft EIR illustrates the existing traffic volumes at the study intersections. The summary data worksheets of turning movement counts at the study intersections are provided in Appendix C of the Transportation Study.*

Table IV.J-1
Level of Service Definitions for Signalized Intersections

Level of Service	V/C Ratio	Definition
A	0.000–0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601–0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701–0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801–0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901–1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980.

traffic counts were reviewed and adjusted accordingly assuming the supermarket to be open and fully operational, consistent with the baseline assumptions throughout this EIR.[6]

The City operates two traffic control systems to improve travel conditions on City streets. The two systems are the Automated Traffic Surveillance and Control (ATSAC) system, which LADOT estimates improves intersection capacity by an average of 7 percent, and the Adaptive Traffic Control System (ATCS), which LADOT estimates improves intersection capacity by an additional 3 percent over those operating under the ATSAC system alone. Each of the signalized study intersections is equipped with both ATSAC and ATCS. Therefore, in accordance with standard LADOT procedures, a capacity

[6] *As discussed in Section II, Project Description, of this Draft EIR, the existing supermarket on the Project Site was vacated in March, 2013. For a supplementary analysis of Project impacts that does not take any credits or offsets for the supermarket operations, see Section VI, Supplementary Baseline Analysis, of this Draft EIR.*

increase of 10 percent (0.10 total V/C adjustment) was applied to reflect the benefits of ATCS and ATSAC control at the study intersections. Table IV.J-2 on page IV.J-15 summarizes the existing weekday morning and afternoon peak-hour V/C ratio and the corresponding LOS for each of the signalized study intersections. As shown, three of the signalized study intersections operate at LOS C or better during both the morning and afternoon peak hours under Existing Conditions. Two of the signalized study intersections operate at LOS F during the afternoon peak hour under Existing Conditions.

(ii) Unsignalized Intersections

Based on LADOT's *Traffic Study Policies and Procedures*, the unsignalized intersection, Intersection 3: Stoner Avenue and Wilshire Boulevard, was evaluated to determine the need for the installation of a traffic signal. The unsignalized intersection was analyzed using the *Highway Capacity Manual* methodology to determine the overall intersection delay. The *Highway Capacity Manual* methodology calculates the average delay, in seconds, of a vehicle passing through the intersection in any direction. The average delay is used to determine the intersection LOS according to the LOS definitions provided in Table IV.J-1 on page IV.J-13.

In conjunction with the overall intersection delay, a traffic signal warrant analysis was prepared pursuant to Section 353 of LADOT's *Manual of Policies and Procedures*. The traffic signal warrant analysis is also consistent with the traffic signal warrants outlined in *California Manual on Uniform Traffic Control Devices* (Caltrans 2012). Specifically, Warrant 3 (Peak Hour) traffic signal warrant was prepared for the existing and future analysis conditions and is based on peak-hour traffic volume data for the major and minor street approaches that comprise the intersection.

(2) Existing Transit System

The Project area is served by public transit, including bus service. Three transit service providers operate lines within the Project area, including the City of Santa Monica Big Blue Bus, the Los Angeles County Metropolitan Transportation Authority (Metro), and the Culver CityBus. Bus transit service in the Project vicinity is available along the following streets:

- Wilshire Boulevard
- San Vicente Boulevard
- Sepulveda Boulevard
- Santa Monica Boulevard
- Bundy Drive
- Montana Avenue

Table IV.J-2
Existing Conditions—Signalized Intersection Peak-Hour Levels of Service

No.	Intersection	Peak Hour	Existing	
			V/C	LOS
1.	Westgate Avenue & Wilshire Boulevard	A.M. P.M.	0.317 0.322	A A
2.	Granville Avenue & Wilshire Boulevard	A.M. P.M.	0.288 0.307	A A
4.	Barrington Avenue & Wilshire Boulevard	A.M. P.M.	0.567 1.552	A F
5.	Federal Avenue & Wilshire Boulevard	A.M. P.M.	0.800 1.758	C F
6.	Barrington Avenue & Texas Avenue	A.M. P.M.	0.573 0.791	A C

V/C = volume-to-capacity ratio per LADOT CMA calculations
LOS = Level of Service based on V/C
Source: Gibson Transportation Consulting, Inc., June 2014.

Existing transit service in the study area is shown in Figure 3 in the Transportation Study included in Appendix J.1 of this Draft EIR. The following list provides a brief description of the bus lines providing service in the Project vicinity. For additional information on the transit lines operating in the Project area, including type and frequency of service, see Table 2 in the Transportation Study.

- Santa Monica Big Blue Bus Line 1—Line 1 travels east-west on Santa Monica Boulevard in the vicinity of the Project Site with average headways of 10 minutes during the morning peak hours and 10 minutes during the afternoon peak hours. The line travels from UCLA to Venice along Santa Monica Boulevard.

- Santa Monica Big Blue Bus Line 2—Line 2 travels east-west on Wilshire Boulevard in the vicinity of the Project Site with average headways of 20 minutes during the morning peak hours and 15 minutes during the afternoon peak hours. The line travels from UCLA to Santa Monica along Wilshire Boulevard.

- Santa Monica Big Blue Bus Line 3—Line 3 travels north-south on San Vicente Boulevard and east-west on Wilshire Boulevard in the vicinity of the Project Site with average headways of 17 minutes during the morning peak hours and 15 minutes during the afternoon peak hours. The line travels from UCLA to the Green Line Station along Montana Avenue and Lincoln Boulevard.

- Santa Monica Big Blue Bus Line 4—Line 4 travels north-south on San Vicente Boulevard and east-west on Wilshire Boulevard in the vicinity of the Project Site with average headways of 30 minutes during the morning and afternoon peak hours. The line travels from the Westside Pavilion to Downtown Santa Monica along San Vicente Boulevard.

- Santa Monica Big Blue Bus Line 11—Line 11 travels east-west on Santa Monica Boulevard in the vicinity of the Project Site with average headways of 60 minutes during the morning and afternoon peak hours. The line travels from UCLA to Santa Monica College along Santa Monica Boulevard.

- Santa Monica Big Blue Bus Line 14—Line 14 travels north-south on Bundy Drive in the vicinity of the Project Site with average headways of 14 minutes during the morning and afternoon peak hours. The line travels from Brentwood to Culver City along Barrington Avenue, Bundy Drive and Centinela Avenue.

- Metro Local Line 4—Line 4 travels east-west on Santa Monica Boulevard in the vicinity of the Project Site with average headways of 11 minutes during the morning peak hours and 12 minutes during the afternoon peak hours. The line travels from downtown Los Angeles to Santa Monica along Santa Monica Boulevard.

- Metro Local Line 20—Line 20 travels east-west on Wilshire Boulevard directly north of the Project Site with average headways of 12 minutes during the morning peak hours and 10 minutes during the afternoon peak hours. The line travels from downtown Los Angeles to Santa Monica along Wilshire Boulevard.

- Metro Rapid Line 704—Line 704 travels east-west on Santa Monica Boulevard in the vicinity of the Project Site with average headways of 15 minutes during the morning peak hours and 13 minutes during the afternoon peak hours. The line travels from downtown Los Angeles to Santa Monica along Santa Monica Boulevard.

- Metro Rapid Line 720—Line 720 travels east-west on Wilshire Boulevard in the vicinity of the Project Site with average headways of 10 minutes during the morning peak hours and eight minutes during the afternoon peak hours. The line travels from Santa Monica to Commerce along Wilshire Boulevard and Whittier Boulevard.

- Metro Rapid Line 761—Line 761 travels east-west on Wilshire Boulevard in the vicinity of the Project Site with average headways of 14 minutes during the morning peak hours and 15 minutes during the afternoon peak hours. The line travels from Pacoima to Westwood along Van Nuys Boulevard and Sepulveda Boulevard.

- Culver CityBus Line 6—Line 6 travels east-west on Wilshire Boulevard and north-south on Sepulveda Boulevard in the vicinity of the Project Site with average headways of 18 minutes during the morning peak and afternoon peak hours. The line travels from UCLA to the Metro Green Line station along Sepulveda Boulevard.

- Culver CityBus Line 6 Rapid—Line 6 Rapid travels east-west on Wilshire Boulevard and north-south on Sepulveda Boulevard in the vicinity of the Project Site with average headways of 15 minutes during the morning peak and afternoon peak hours. The line travels from UCLA to the Metro Green Line station along Sepulveda Boulevard.

(3) Bicycle and Pedestrian Network

(a) Existing Bicycle System

Based on the *2010 Bicycle Plan*,[7] the existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes, which are facilities where bicycles have use of a dedicated and striped lane within the roadway, 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, which are facilities where bicycles share the lane with vehicular traffic on a marked and signed roadway, are identified as bicycle-friendly streets where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes are preferably located on collector and lower volume arterial streets. A discussion of the bicycle facilities provided along corridors within the study area is provided below.

The bicycle lanes (Class II) in the study area include:

- San Vicente Boulevard from 26th Street to Bundy Drive

The bicycle routes (Class III) in the study area include:

- San Vicente Boulevard from Bundy Drive to Wilshire Boulevard
- Federal Avenue from Wilshire Boulevard to Ohio Avenue
- Texas Avenue from Bundy Drive to Federal Avenue

[7] *Los Angeles Department of City Planning, 2010.*

(b) Existing Pedestrian Facilities

The walkability of existing facilities is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. These attributes are quantified by WalkScore.com, which calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel and assigns a score out of 100 points. With the various commercial businesses and cultural facilities adjacent to residential neighborhoods within the West Los Angeles area, the Project Site is rated with a score of 72 of 100 possible points (as of November 6, 2013) and defined as "Very Walkable so most errands can be accomplished on foot."

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 provide connectivity to pedestrian crossings at intersections within the study area. All of the signalized intersections in the study area provide marked crosswalks and access ramps. In the Project vicinity, the signalized intersection of Granville Avenue and Wilshire Boulevard provides marked pedestrian crossings with pedestrian phasing for the east and south crossings of the intersection to limit illegal mid-block crossings of Wilshire Boulevard. The crosswalk at the south side of this intersection complies with the Americans with Disabilities Act (ADA) wheelchair access ramp design. The unsignalized intersection of Stoner Avenue and Wilshire Boulevard in the Project vicinity does not provide marked pedestrian crossings at the intersection. However, there are no posted signs prohibiting pedestrian crossings.

(4) Existing Parking and Access

The 2.8-acre Project Site contains surface parking and circulation areas, as well as a subterranean parking garage. A total of 1,321 parking spaces are provided on-site, including 87 surface spaces and 1,234 subterranean spaces. Vehicular access to the surface parking lot at the plaza level is provided by an ingress-only driveway on Stoner Avenue and an egress-only driveway on Granville Avenue. To the south of each driveway, a two-way access ramp provides direct vehicular access to the subterranean parking lot (one on Stoner Avenue and one on Granville Avenue). Loading access for the existing supermarket building is provided at the southeast corner of the Project Site from Stoner Avenue.

d. Future Conditions Without the Project

(1) Ambient Growth

Existing traffic is expected to increase as a result of regional growth and development. Based on historic trends, an ambient growth factor of 1.0 percent per year is used to adjust the existing traffic volumes to reflect the effects of regional growth and development by the year 2017, the Project build-out year in the Transportation Study. The total adjustment applied over the four-year period to full buildout of the Project is, therefore, 4.0 percent.

(2) Related Projects

This analysis also considers the effects of other developments either proposed, approved, or under construction in the study area. Though the buildout years of these related development projects are uncertain, they were assumed to be completed by the Project buildout year. With this information, the potential impact of the Project can be evaluated within the context of the cumulative impact of all ongoing development. Information about the related projects was obtained from LADOT, as well as from recent published reports for other developments. The related projects are located within the study area, as shown in Table 2 in the Transportation Study contained in Appendix J.1 of this Draft EIR. The locations of the related projects are shown in Figure 5 in the Transportation Study.[8]

Other developments outside the Study area have been determined to be geographically too far from the Project Site to add substantially to the potential cumulative effects of Related Project traffic within the study area. Any additional projects that may be proposed between now and the full buildout of the Project are accounted for by the ambient growth in traffic discussed above.

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[8] *It should be noted that subsequent to the approval of the Transportation Study by LADOT, an additional related project was added to the Draft EIR's related project list (see Table III-1 in Section III, Environmental Setting). Related Project No. 25 is a mixed-use project that proposes 516 residential dwelling units, 67,000 square feet of retail uses, and 200,000 square feet of office uses. It is located at 12101 West Olympic Boulevard, approximately 1.5 miles south of the Project Site. Based on the location, size, and traffic-generating characteristics of the proposed mix of uses, as well as the associated distribution of trips within the Project study area, traffic generated by Related Project No. 25 would be captured within the ambient growth factor that was applied to the traffic analysis (i.e., 1.0 percent per year, for a total of 4.0 percent). As such, although Related Project No. 25 is not included in the Transportation Study's list of related projects, its traffic was considered in the future cumulative traffic conditions.*

The trips associated with the related projects were accounted for in the future traffic forecasts through the following three-step process: trip generation, trip distribution, and trip assignment.

Trip-generation estimates for the related projects were provided by the respective jurisdiction or were calculated using a combination of previous study findings and the trip-generation rates contained in *Trip Generation, 9th Edition*.[9] As shown in Table 2 in the Transportation Study contained in Appendix J.1 of this Draft EIR, the related projects are expected to generate a total of approximately 53,572 daily trips on a typical weekday, including 3,931 morning peak-hour trips and 4,953 afternoon peak-hour trips. These projections are conservative in that they assume that each related project is built out at the fullest intensity and they do not in every case account for either the existing uses to be removed or the likely use of non-motorized travel modes (transit, bicycling, walk, etc.).

The geographic distribution of the traffic generated by the related projects is dependent on several factors. These factors include the type and density of the proposed land uses, the geographic distribution of population from which the employees/residents and potential patrons of the related projects are drawn, and the location of these projects in relation to the surrounding street system. These factors are considered along with logical travel routes through the street system to develop a reasonable pattern of trip distribution.

The trip-generation estimates for the related projects were assigned to the local street system using the trip distribution pattern described above and illustrated in Figure 6 in the Transportation Study included in Appendix J.1 of this Draft EIR. These volumes were then added to the existing traffic volumes after adjustment for ambient growth through the projected buildout year. These volumes represent the Future Without Project condition (i.e., existing traffic volumes, ambient traffic growth, and related project traffic) illustrated in Figure 7 in the Transportation Study.

(3) Future Roadway Improvements

The Wilshire Bus Rapid Transit (BRT) project is currently under construction and will span 12.5 miles along Wilshire Boulevard from Valencia Street (west of I-110) to Centinela Avenue. Improvements will occur on approximately 10 miles of Wilshire Boulevard, which include; restriping of traffic lanes, conversion of existing curb lanes to peak period bus lanes, upgrading the existing transit signal priority system, selective street widening, curb lane reconstruction/resurfacing in select areas, and installing traffic signage and pavement markings.

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[9] *Institute of Transportation Engineers, 2012.*

Many of the existing curb lanes within the jurisdiction of the City will be converted to exclusive bus lanes and right-turn-only lanes during weekday commuter peak hours (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 7:00 P.M.). The Wilshire BRT includes the following improvements along and adjacent to Wilshire Boulevard:

- Conversion of curb lanes from Western Avenue to Fairfax Avenue to peak period bus lanes that will allow buses to consistently use the curb lane, and improving the capacity of the two adjacent lanes by moving buses from the adjacent lanes to the curb lanes
- Conversion of curb lanes to peak period bus lanes from Fairfax Avenue to the City of Beverly Hills city limit at San Vicente Boulevard, including minor surface repairs
- No bus lanes implemented within the City of Beverly Hills or along the segment between Comstock Avenue and Bonsall Avenue
- Conversion of curb lanes from Santa Monica Boulevard to Comstock Avenue and between Barrington Avenue and Centinela Avenue to peak period bus lanes
- Lengthening of the eastbound left-turn pocket at Sepulveda Boulevard by approximately 470 feet
- Widening of both sides of Wilshire Boulevard between Bonsall Avenue and Barrington Avenue, and restriping travel lanes to add peak period bus lanes
- Transit priority system (TPS) communication system upgrade, TPS enhancements, signage, and restriping, as necessary, along the BRT corridor
- Buses will operate in mixed-flow traffic where no exclusive bus lanes are provided

The first segment of the Wilshire BRT between South Park View Street and Western Avenue (approximately 9 miles east of the Project Site) opened in June 2013. The final segment from Federal Avenue to Centinela Avenue is under construction (at the time of preparation of this Draft EIR) and is scheduled to open in late 2015.[10]

Between Westgate Avenue and Barrington Avenue in the Project Study Area, the Wilshire BRT Project includes conversion of curb lanes to peak period bus lanes and TPS enhancements. Between Barrington Avenue and Federal Avenue/San Vicente Boulevard in the Project Study Areas, the Wilshire BRT Project includes widening along both sides of

[10] *Metro, Wilshire Bus Rapid Transit Project, www.metro.net/projects/wilshire/, accessed April 14, 2016.*

Wilshire Boulevard to add curbside peak period bus lanes and TPS enhancements. Along this segment of Wilshire Boulevard, the existing street geometrics with respect to travel lanes will be maintained, and the lane configurations at the study intersections will not be affected by the Wilshire BRT Project. However, mitigation was specified in that project's Final EIR to improve traffic operations and reduce the impacts of the Wilshire BRT Project that includes a traffic signal modification at the Barrington Avenue & Wilshire Boulevard intersection (Study Intersection No. 4) to provide protected-permitted left-turn phasing (Mitigation Measure T-1). It is anticipated that this measure will improve traffic operation and reduce delay along the Wilshire Boulevard Corridor.

Although future programmed roadway improvements associated with the Wilshire BRT Project and other mitigation measures for other recently approved developments in the Study Area may be proposed and/or constructed prior to Project buildout (e.g., freeway ramp improvements, physical improvements, traffic signal enhancements), such improvements were not included as part of the future conditions analyses in order to provide a conservative analysis and comply with LADOT analysis requirements. However, to provide further information, a supplemental traffic analysis of future conditions with the Wilshire BRT Project was prepared and is provided in Appendix F of the Transportation Study contained in Appendix J.1 of this Draft EIR.

(4) Future Without Project Intersection Level of Service

As shown in Table IV.J-3 on page IV.J-23, three of the signalized study intersections are anticipated to operate at LOS D or better during both the A.M. and P.M. peak hours in the Future Without Project condition. Two of the signalized study intersections are anticipated to operate at LOS F during the P.M. peak hour, including:

4. Barrington Avenue & Wilshire Boulevard
5. Federal Avenue/San Vicente Boulevard and Wilshire Boulevard

3. Environmental Impacts

a. Methodology

The methodology and base assumptions used in this analysis were established by LADOT and, where LADOT does not prescribe a specific methodology, the *L.A. CEQA Thresholds Guide*. The assumptions and methods used in this analysis have been chosen to create an analytically conservative set of conditions. This analysis addresses a wide range of issues including, but not limited to, the following:

Table IV.J-3
Future Without Project Conditions—Signalized Intersection Peak-Hour Levels of Service

No.	Intersection	Peak Hour	Existing	
			V/C	LOS
1.	Westgate Avenue & Wilshire Boulevard	A.M.	0.336	A
		P.M.	0.349	A
2.	Granville Avenue & Wilshire Boulevard	A.M.	0.318	A
		P.M.	0.332	A
4.	Barrington Avenue & Wilshire Boulevard	A.M.	0.623	B
		P.M.	1.718	F
5.	Federal Avenue & Wilshire Boulevard	A.M.	0.861	D
		P.M.	1.898	F
6.	Barrington Avenue & Texas Avenue	A.M.	0.693	B
		P.M.	0.895	D

V/C = volume-to-capacity ratio per LADOT CMA calculations
LOS = Level of Service based on V/C
Source: Gibson Transportation Consulting, Inc., June 2014.

- Construction: an analysis of the potential impacts on traffic flows and safety resulting from the Project's construction activities;
- Intersections: an analysis of the potential changes in operating conditions at the 6 study intersections located within the study area;
- Transit System: an analysis of potential impacts on the capacity of transit lines serving the Project Site; and
- Project Access: an analysis of potential impacts associated with access to and from the Project Site by automobiles, bicyclists, and pedestrians.

(1) Construction Impacts

As stated below, the *L.A. CEQA Thresholds Guide* identifies four types of in-street construction impacts and a number of factors for determining the significance of a project's construction-related traffic impacts. Each of the four types of construction impacts refers to a particular population that could be inconvenienced by construction activities. The four types of impacts and related populations are:

- Temporary traffic impacts: potential impacts on vehicular travelers on roadways

- Temporary loss of access: potential impacts on visitors entering and leaving sites
- Temporary loss of bus stops or rerouting of bus lines: potential impacts on bus travelers
- Temporary loss of on-street parking: potential impacts on parkers

The analysis is based, in part, on an estimate of construction-related trips (i.e., construction worker trips and construction truck trips) that would occur as a result of the Project, as provided in the Construction Traffic Analysis included in Appendix J.3 of this Draft EIR. Based on this trip estimate, as well as other features of Project construction, factors that would contribute to either: (1) a potential inconvenience in the performance of one's daily activities (i.e., an impact on traffic operations); and/or (2) a concern to public safety, were considered in determining the extent to which an inconvenience or threat to safety would occur.

(2) Operational Impacts

The relative impact of the added traffic volumes that would be generated by the Project was evaluated based on analysis of operating conditions at the study intersections, with and without the Project. As required by CEQA and LADOT's *Traffic Study Policies and Procedures*, the Project's impacts were evaluated against Existing and Future traffic conditions. The following discussion describes the components of the Project's operational traffic impact analysis.

(a) Level of Service Methodology

The existing and future traffic volumes at the study intersections were evaluated using the CMA methodology, which, as discussed above, determines V/C ratios on a critical movement basis. The overall intersection V/C ratio is subsequently assigned an LOS value to describe intersection operations. LOS is a qualitative measure used to describe traffic flow conditions. Table IV.J-1 on IV.J-13 provides a description of the LOS categories, which range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F. For the study intersections, CMA calculation worksheets developed by LADOT were used to implement the CMA methodology.

(i) Project Trip Generation

As discussed in detail in Section VI. Baseline Discussion, environmental conditions may vary from year to year and in some cases it is necessary to consider conditions over a range of time periods. Environmental conditions may also change during the period of environmental review, and temporary lulls or spikes in operations that happen to occur

during the period of review should not depress or elevate the baseline. A lead agency has the discretion to decide "exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence."[11] Thus, a lead agency has the discretion to choose a different baseline if its decision is supported by substantial evidence.

In *North County Advocates v. City of Carlsbad* (2015), the California Court of Appeal upheld a lead agency's selection of an environmental baseline that imputed trips to a department store that had been used for many years on the project site but was vacant at the time that the lead agency commenced preparation of the EIR and took a trip credit for the demolition of the store.[12] The Court found that the historical use of the department store, the fact that it could be reoccupied without any discretionary approvals, and the fact that the local transportation agency's established methodology called for the imputation of the trips and a credit for the store even though it was not in use constituted substantial evidence to support the lead agency's selection of the baseline.

The City's existing policies and ordinances adopt the same approach as in the Court of Appeal case summarized above. For purposes of establishing baseline conditions relative to traffic impacts, LADOT's *Traffic Study Policies and Procedures* (June 2013) stipulates that when estimating a project's net new trips, it is appropriate to take trip credits for an existing use if the existing use was active for at least six months during the past two years. Additionally, pursuant to the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP), an ordinance adopted by the City Council that applies to the Project Site, LADOT shall grant a credit for each trip generated by an existing use if the existing use has been in place and operating for at least one year continuously during the four years immediately preceding the application for a project. Therefore, the analysis in the Project's Transportation Study, which forms the basis for the analysis in this section, includes trip credits for the existing supermarket based on the rates established by the Institute of Transportation Engineers (ITE), and also factors in a "pass-by" credit per LADOT Guidelines. As in the recent Court of Appeal decision, the Project's Transportation Study appropriately imputed trips to the supermarket in assessing existing conditions.

The traffic-generating characteristics of many land uses have been surveyed and documented in studies conducted under ITE. The trip-generation rates for these land uses are provided in the ITE's *Trip Generation, 9th Edition* manual. These data are nationally recognized, and are used as the basis for most traffic studies conducted in the City of

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[11] *Communities for a Better Environment vs. South Coast Air Quality Management Distr. (2010) 48 Cal.4th 310, 327–328.*

[12] *North County Advocates v. City of Carlsbad, (2015) 241 Cal. App. 4th 94.*

Los Angeles and the surrounding region. The trip-generation rates for Land Use Codes 220 (Apartment), 710 (Office), 820 (Shopping Center), and 850 (Supermarket) were used to develop the Project trip-generation estimates. Trip generation rates from the WLA TIMP were also used to develop the trip generation estimates for the P.M. peak hour. Table IV.J-4 on page IV.J-40 provides the trip generation for the Project. It should be noted that the pass-by reductions were not assigned at Project Site driveways.

(ii) Project Trip Distribution and Assignment

The traffic volumes for both the existing supermarket use and the Project were distributed and assigned to the local street system based on demographics and existing/anticipated travel patterns in the Study Area, characteristics of the street system service at the Project Site, the level of accessibility of the routes to and from the Project Site, existing intersection traffic volumes, the proposed site access and circulation scheme, the location of the proposed driveways, as well as input from LADOT staff. Localized routes of travel through the Study Area were developed based on existing traffic patterns and relative travel times on various corridors and the level of accessibility of the route to and from the Project Site. The Project trip distribution was developed to reflect the proposed changes to the access points on Stoner Avenue and Granville Avenue.

Traffic volumes for both the existing supermarket use and the Project were distributed to the surrounding street system based on the following general pattern: approximately 20 percent of the traffic is generated to/from the north, 30 percent to/from the east, 25 percent to/from the south, and 25 percent to/from the west. The percentages generated on Granville Avenue from the south were split between trips from the west on Texas Avenue and trips from the south on Westgate Avenue. The distribution of Project traffic through the study intersections is illustrated in Figure 8 in the Transportation Study included in Appendix J.1 of this Draft EIR. The distribution pattern was reviewed and approved by LADOT.

The trip distribution pattern was applied to the trip generation to develop the net new Project traffic volumes at the study intersections, as illustrated in Figure 9 in the Transportation Study.

(b) Regional Transportation System (Freeway) Analysis

The potential impacts of the Project on CMP monitoring stations and freeways were analyzed in accordance with the CMP Traffic Impact Analysis (TIA) guidelines. In order to address the potential for regional traffic impacts, the number of net new peak-hour Project trips was added to the CMP monitoring locations and freeways in the Project vicinity to determine whether these volumes exceed the CMP thresholds of 150 vehicles per hour for freeway segments or 50 vehicle trips per hour for arterial monitoring stations. If the Project

traffic volumes are not found to exceed the CMP screening thresholds, no further analysis is required. If the Project traffic volumes would exceed the CMP screening thresholds, the thresholds of significance below would apply.

(c) Street Segment Analysis

The Project's potential street segment impacts were analyzed under Existing With Project Conditions. The street segments to be analyzed were chosen and analyzed based on consultation with LADOT. Street segment average daily traffic (ADT) counts during the typical weekday were conducted on Stoner Avenue, Granville Avenue, and Texas Avenue over a 24-hour period (from midnight to midnight) on Tuesday, October 16, 2013. Project traffic volumes were added to the Existing pre-Project ADT volumes to generate the Existing With Project ADT volumes. ADT volumes are provided in Figure 12 in the Transportation Study included in Appendix J.1 of this Draft EIR.

(d) Access and Circulation

The analysis of the Project's potential access impacts included a review of the proposed vehicular access points and internal circulation. A determination was made pursuant to the thresholds of significance below regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

(e) Public Transit

Section B.8.4 of the CMP provides a methodology for estimating the number of transit trips expected to result from a project based on the number of vehicle trips. This methodology assumes an average vehicle occupancy (AVO) factor of 1.4 in order to estimate the number of person trips to and from a project. The CMP guidelines estimate that approximately 7 percent of the total project person trips may use public transit to travel to and from the Project Site.

Accordingly, the transit system analysis estimates the number of Project transit trips using the AVO factor of 1.4 and 7 percent of person trips using transit. A determination is made as to whether existing transit lines could accommodate the Project's transit demand pursuant to the thresholds of significance below.

(f) Parking

To analyze whether sufficient parking spaces would be provided by the Project, a parking analysis was conducted based on the requirements of the LAMC. Pursuant to Section 12.22.A25d(1) of the LAMC (commonly referred to as Density Bonus Parking

Option 1), one automobile stall per dwelling unit is required for the Project's studio and one-bedroom residential units and two automobile stalls per dwelling unit are required for the Project's two-bedroom residential units. In addition, pursuant to Section 12.21.A4 of the LAMC, two automobile stalls are required per 1,000 square feet of office floor area for the existing office building. Pursuant to Section 12.24Y of the LAMC, the on-site office may also receive a 10 percent reduction in required parking because the Project Site is located less than 1,500 feet from a transit facility. With respect to bicycle stalls, one short-term bicycle stall per residential unit and one long-term bicycle stall per ten residential units are required under Section 12.21 of the LAMC. No bicycle stalls are required for the existing office building.

Based on these requirements, the Project would be required to provide 1,090 automobile stalls and 414 bicycle stalls (including 376 long-term stalls and 38 stalls short-term for the proposed residential uses).

(g) Bicycle, Pedestrian, and Vehicular Safety

The methodology for the analysis of pedestrian/bicycle safety impacts includes a review of the Project's access and internal circulation scheme and a determination of whether the Project would substantially increase the potential for pedestrian/vehicle and/or bicycle/vehicle conflicts pursuant to the thresholds of significance below.

b. Thresholds of Significance

(1) Appendix G of the CEQA Guidelines

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to transportation/traffic. These questions are as follows: Would the project:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

- Conflict with an applicable congestion management program including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Appendix G of the CEQA Guidelines does not include a sample threshold of significance for parking impacts.[13]

(2) L.A. CEQA Thresholds Guide

Based off of the questions from Appendix G of the CEQA Guidelines, the *L.A. CEQA Thresholds Guide* includes specific factors to be considered with regard to impacts associated with transportation. Specifically, Section L of the *L.A. CEQA Thresholds Guide* requires the transportation analysis to address the following areas of study: (1) intersection capacity; (2) street segment capacity; (3) freeway capacity; (4) neighborhood intrusion impacts; (5) project access; (6) transit system capacity; (7) parking; and (8) in-street construction impacts.

With regard to neighborhood intrusion impacts, the screening criterion in the *L.A. CEQA Thresholds Guide* is whether a project would generate more than 120 daily vehicle trips on a local residential street. As discussed below, the Project would result in a net decrease in ADT to/from the Project Site, including a net reduction in daily traffic volumes along the studied residential street segments. Therefore, a neighborhood intrusion analysis is not required.

(a) Construction Impacts

The *L.A. CEQA Thresholds Guide* (page L.8-2) states that the determination of significance regarding in-street construction impacts shall be made on a case-by-case basis, considering the following factors:

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[13] *The prior checklist question regarding inadequate parking capacity was deleted in 2010 pursuant to a number of amendments to the CEQA Guidelines that went into effect on March 18, 2010.*

(i) Temporary Traffic Impacts

- The length of time of temporary street closures or closures of two or more traffic lanes;
- The classification of the street (major arterial, state highway) affected;
- The existing traffic levels and LOS on the affected street segments and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
- Potential safety issues involved with street or lane closures; and
- The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.

(ii) Temporary Loss of Access

- The length of time any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- The availability of alternative vehicular or pedestrian access within 0.25 mile of the lost access; and
- The type of land uses affected, and related safety, convenience, and/or economic issues.

(iii) Temporary Loss of Bus Stops or Rerouting of Bus Lines

- The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
- The availability of a nearby location (within a 0.25-mile radius) to which the bus stop or route can be temporarily relocated;
- The existence of other bus stops or routes with similar routes/destinations within a 0.25-mile radius of the affected stops or routes; and
- Whether the interruption would occur on a weekday, weekend, or holiday, and whether the existing bus route typically provides service on that/those day(s).

(iv) Temporary Loss of On-Street Parking

- The current utilization of on-street parking;

- The availability of alternative parking locations or public transit options (e.g., bus, train) within a 0.25-mile radius of the Project Site; and

- The length of time that existing parking spaces would be unavailable.

Based on the considerations above, for the purposes of this analysis, Project construction would have a significant impact on traffic and circulation if construction activities were to: (1) cause substantial delays and disruption of existing traffic flow; (2) require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur; (3) result in changes to bus/transit service such that a substantial inconvenience to riders would occur; or (4) result in the substantial loss of on-site and/or off-site parking such that the parking needs of the Project area would not be met.

(b) Operational Impacts

(i) Intersection Capacity

The *L.A. CEQA Thresholds Guide* (page L.1-3) and LADOT criteria state that a project would normally have a significant impact on signalized intersection capacity if the project's traffic causes an increase in the V/C ratio at the intersection based on the following sliding scale:

Intersection Conditions With Project Traffic		Project-Related Increase in Volume-to-Capacity (V/C) Ratio
Level of Service	**Volume-to-Capacity (V/C) Ratio**	
C	0.701–0.800	≥ 0.04
D	0.801–0.900	≥ 0.02
E, F	> 0.900	≥ 0.01

(ii) Street Segment Capacity

The Traffic Study Policies and Procedures (LADOT, June 2013) deems a transportation impact at a street segment significant based on the following criteria:

Projected ADT with Project (Final ADT)	Project-Related Increase in ADT
0 to 999	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

ADT = Average Daily Traffic;
Source: Los Angeles Department of Transportation.

(iii) Regional Transportation System (Freeway) Impacts

In accordance with guidelines established in the CMP, if a project would add 150 or more peak-hour trips to a mainline freeway monitoring location or 50 or more peak-hour trips to an arterial monitoring station, a significant impact would be identified if the demand-to-capacity ratio increases by 0.02 or greater and the final "With Project" LOS is F or worse. A project would not be considered to have a regionally significant impact, regardless of the increase in the demand-to-capacity ratio, if the analyzed facility is projected to operate at LOS E or better after the addition of project traffic.

(iv) Access and Circulation

According to the *L.A. CEQA Thresholds Guide* (page L.5-2), a project would have a significant impact on project access if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hours under Future With Project conditions.

(v) Public Transit

The *L.A. CEQA Thresholds Guide* (page L.6-2) states that the determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of a project and available transit capacity.

(vi) Parking

The threshold of significance with respect to parking set forth in the *L.A. CEQA Thresholds Guide* (page L.7-2) states that a project would normally have a significant impact on parking if the project provides less parking than what is required by City code, including the LAMC, Transportation Specific Plan, or Interim Control Ordinance requirements, taking into account any adjustments or reductions permitted under the LAMC. Therefore, for purposes of this analysis, impacts to parking would be considered

significant if the Project would not provide the number of parking spaces required pursuant to relevant LAMC requirements.

(vii) Bicycle, Pedestrian, and Vehicular Safety

The *L.A. CEQA Thresholds Guide* (page L.5-3) states that the determination of potential impacts related to bicycle, pedestrian, and vehicular safety shall be determined on a case-by-case basis, considering the following factors:

- The 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 site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facility the project driveway(s) crosses and the level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle or vehicle/vehicle impacts.

Based on these factors, a project would have a significant impact if development of the project would substantially increase hazards to bicyclists, pedestrians, or vehicles.

c. Regulatory Compliance and Project Design Features

(1) Regulatory Compliance

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with applicable Federal Aviation Administration requirements regarding rooftop lighting for high-rise structures. In addition, the Project would comply with the notice requirements imposed by the Federal Aviation Administration for all new buildings taller than 200 feet, would complete Form 7460-1 (Notice of Proposed Construction or Alteration), and would obtain a no hazards determination pursuant to Title 49 U.S.C. Section 44718.

(2) Project Design Features

The Project would implement the following project design feature which is relevant to the assessment of traffic, access, and parking impacts:

Project Design Feature J-1: Prior to the start of construction, the Project Applicant shall prepare and submit to the Los Angeles Department of Transportation for review and approval a construction management plan. Subject to approval by the Los Angeles Department of Transportation, features of the construction management plan should include, but shall not be limited to, the following:

- Maintaining existing access for land uses in proximity of the Project Site, including land uses that are accessed from the alley to the south of the Project Site;
- Limiting potential lane closures to off-peak travel periods, to the extent feasible;
- Scheduling receipt of construction materials during non-peak travel periods, to the extent possible;
- Coordinating deliveries to reduce the potential trucks waiting to unload for extended periods of time;
- Prohibiting parking by construction workers on adjacent streets and directing construction workers to park on-site or other designated parking areas;
- Maintaining adequate and safe pedestrian protection including physical separation (including utilization of barriers such as K-Rails, scaffolding, etc.) from work space and vehicular traffic, and overhead protection, due to sidewalk closures or blockage, at all times;
  - Temporary pedestrian facilities shall be adjacent to the Project Site and provide, safe, accessible routes that replicate as nearly as practical the characteristics of the existing facility;
  - Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects;
  - Sidewalks shall be closed or blocked only when necessary for construction staging, and shall be reopened as soon as reasonably feasible taking construction and construction staging into account;
- Complying with the approved construction traffic control plans that identify all traffic control measures, signs, delineators, etc., to be implemented by the construction contractor through the duration of construction; and
- Using flag persons to control traffic movement during the ingress and egress of trucks and heavy equipment from the Project Site and/or temporary lane closures.

In addition, the construction management plan shall take into account and be coordinated with other construction management plans that are in effect or have been proposed for other projects in the Project vicinity.

Project Design Feature J-2: Prior to the start of construction, the Project Applicant shall prepare and submit to the Los Angeles Department of Transportation for review and approval a haul truck route program that specifies the construction truck routes to and from the Project Site.

d. Project Impacts

(1) Construction Impacts

Potential traffic impacts from construction activities could occur as a result of the following types of activities:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials
- Increases in automobile traffic associated with construction workers traveling to and from the Project Site
- Reductions in existing street capacity from temporary lane closures necessary for the construction of the Project, roadway improvements, utility relocation, or drainage facilities
- Blocking existing vehicle or pedestrian access to other parcels fronting streets

The impact of construction truck traffic (including haul trucks) would be a lessening of the capacities of access streets and haul truck routes due to the slower movements and larger turning radii of trucks. The following discussion addresses each of these potential impacts based on the construction characteristics of the Project.

(a) Proposed Construction Schedule

Construction of the Project would commence with the demolition of the existing supermarket structure. It is estimated that approximately 15,600 cubic yards (cy) of demolition material, including building material and concrete, would be exported from the Project Site during the demolition phase. Partial demolition of the subterranean parking garage would then be completed in order to install the pile foundation system for the residential building. Pile installation would require an export of approximately 16,000 cy of soil from below the existing foundation of the parking garage. This process is expected to

take approximately four months to complete. Following installation of the pile foundation system, building construction, paving/concrete installation, and landscape installation would occur. This building construction is expected to take approximately 26 months to complete. Up to 3,000 cy of soil import may be required as part of new landscaping installation and construction of the 18,000-square foot, privately maintained, publicly accessible open space area. The Project is therefore expected to take a total of approximately 30 months to complete.

(b) Construction Worker Trips and Parking

Construction worker traffic would depend on the level of activity during various construction phases, as well as the mode and time of travel of the workers. The hours of construction typically require workers to be on-site before the morning peak period (i.e., arrive prior to 7:00 A.M.) and require them to leave before or after the afternoon peak period (i.e., leave before 3:00 P.M. or after 6:00 P.M.). Therefore, most, if not all, of the construction worker trips would occur outside the typical weekday morning and afternoon peak periods.

Based on the construction schedule, there will be a maximum of 360 workers on the Project Site during the periods of peak construction activity, which would occur during the building phase of Project construction. This analysis assumes that a portion of the workers would carpool to the Project Site, resulting in an Average Vehicle Ridership (AVR) of 1.135, as provided in *CEQA Air Quality Handbook* (South Coast Air Quality Management District, 1993). A maximum of 317 worker-related vehicles are expected to travel to and from the Project Site during days of peak construction activity, with each vehicle expected to travel to and from the Project Site outside of the morning and afternoon peak periods.

Truck and construction equipment staging, as well as construction worker parking, would be accommodated within the Project Site and within an approximately 940-square foot equipment staging area within the curb lane on Stoner Avenue, in front of the existing driveway to the subterranean parking garage (see Figure II-15 in Section II, Project Description, of this Draft EIR). Construction activities are not anticipated to require the removal of, or impair access to, on-street parking spaces along Wilshire Boulevard, Stoner Avenue, or Granville Avenue.

(c) Haul Truck Activity

The period of heaviest truck activity (e.g., haul trucks, delivery trucks, etc.) would occur during the building construction phase. A maximum of 75 trucks would travel to/from the Project Site on a worst-case day during the building construction phase. This worst-case scenario of 75 trucks corresponds to 150 daily truck trips (75 inbound and 75 outbound) spread throughout the day during the construction phase.

As reflected in Project Design Feature J-2, the Project would require LADOT approval of a haul truck route program as part of the Project permitting process. Demolition and construction debris is anticipated to be transported from the Project Site to the Azusa Land Reclamation Landfill via the I-405 freeway. Subject to LADOT approval, the truck routes to and from the Project Site would generally include:

- Outbound: Stoner Avenue or Granville Avenue to Wilshire Boulevard to I-405; and
- Inbound: I-405 to Wilshire Boulevard to Stoner Avenue or Granville Avenue.

(d) Potential Impacts of Construction Traffic

(i) Peak-Hour Intersection Impacts

Pursuant to Project Design Feature J-1, construction truck activity is expected to occur outside of peak traffic hours (i.e., between 10:00 A.M. and 3:00 P.M.). As previously discussed, construction workers are expected to arrive before 7:00 A.M. and leave before 3:00 P.M. or after 6:00 P.M. Therefore, no construction related traffic activity would occur during either the morning or afternoon peak periods, and traffic impacts from construction related activities would be less than significant.

(ii) Access and Safety Impacts

During Project construction, access to the Project Site would be maintained via the surface driveways along Stoner Avenue and Granville Avenue. In addition, access would be maintained at all times to the public alley south of the Project Site, which provides access to loading areas, as well as adjacent properties. An approximately 940-square foot area within the curb lane on Stoner Avenue in front of the existing driveway to the subterranean parking garage would be used for construction equipment staging (see Figure II-15 in Section II, Project Description, of this Draft EIR). It is anticipated that pedestrian sidewalks, including the sidewalk along the Stoner Avenue staging area, would be maintained during construction through either the existing sidewalks/facilities or through temporary walkways, as required in the construction management plan, which would be implemented pursuant to Project Design Feature J-1. The construction management plan would include measures to ensure pedestrian safety along affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). Additionally, minor trenching may occur to install utilities on Granville Avenue and Stoner Avenue. Trenching would be in limited areas and traffic would be directed around such activities as required. The trenching-related activities would be limited and short-term in nature. Any potential temporary lane closures to accommodate utility work would be addressed as part of the

construction management plan, which would be implemented pursuant to Project Design Feature J-1.

Pursuant to Project Design Feature J-1, a construction management plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Features of the construction management plan, which would be developed in consultation with LADOT, would include maintaining existing access for land uses in proximity of the Project Site, limiting potential lane closures to off-peak travel periods, to the extent feasible, and using flag persons to control traffic movement during the ingress and egress of trucks and heavy equipment from the Project Site and/or temporary lane closures. Implementation of the construction management plan would minimize potential conflicts between construction activity and pedestrian and vehicular traffic in the vicinity of the Project Site. With implementation of the construction management plan (Project Design Feature J-1) and haul truck route program (Project Design Feature J-2), construction traffic impacts related to access and safety would be less than significant.

(iii) Bus/Transit Impacts

No construction-related activities would take place on Wilshire Boulevard. The transit stops located closest to the Project Site on the corner of Wilshire Boulevard and Barrington Avenue as well as Wilshire Boulevard and Westgate Avenue would be maintained. There are no bus/transit routes on Stoner Avenue or Granville Avenue along the Project Site. Therefore, Project construction would not result in a temporary loss of bus stops or rerouting of bus lines, and impacts to bus/transit service would be less than significant.

(iv) Parking Impacts

Truck and construction equipment staging, as well as construction worker parking, would be accommodated within the Project Site and within an approximately 940-square foot equipment staging area within the curb lane on Stoner Avenue, in front of the existing driveway to the subterranean parking garage (see Figure II-15 in Section II, Project Description, of this Draft EIR). Project construction is not anticipated to require the removal of, or impair access to, on-street parking spaces along Wilshire Boulevard, Stoner Avenue, or Granville Avenue. Therefore, impacts related to on-street parking during construction are anticipated to be less than significant.

(v) Conclusion

Based on the analysis above, Project construction would not: (1) cause substantial delays and disruption of existing traffic flow; (2) require substantial roadway and/or

sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur; (3) result in changes to bus/transit service such that a substantial inconvenience to riders would occur; or (4) result in the substantial loss of on-site and/or off-site parking such that the parking needs of the Project area would not be met. Therefore, construction-related impacts to traffic, access, and parking would be less than significant, and no mitigation is required.

(2) Operational Impacts

(a) Project Trip Generation

As shown in Table IV.J-4 on page IV.J-40, the estimate of the Project's trip generation is based on the most recent trip-generation rates from *Trip Generation, 9th Edition* for the following land uses: Land Use Code 220 (Apartment) for the 376 multi-family dwelling units, Land Use Code 710 (Office) for the existing office building, and Land Use Code 850 (Supermarket) for the existing supermarket building.[14]

Based on LADOT's *Traffic Study Policies and Procedures*, when estimating the Project's net new trips, trip credits for an existing use is appropriate if the existing use was active for at least six months during the past two years. Pursuant to the WLA TIMP, LADOT shall grant a credit for each trip generated by the existing use, if the existing use has been in place and operating for at least one year continuously during the four years immediately preceding the application for the Project. The existing supermarket was in operation for at least six months during the past two years and for at least one year continuously during the four years immediately preceding the application for the Project. As such, the trip generation forecast shown in Table IV.J-4 reflects the Project and the removal of the existing supermarket building. It should be noted that the pass-by reductions were not assigned at Project Site driveways.

[14] *As discussed in Appendix G of the Project's Transportation Study, which is included in Appendix J of this Draft EIR, changes were made to the proposed site plan subsequent to the preparation of the Project's Transportation Study. Specifically, an approximately 4,700-square foot commercial building that was previously planned along the Project Site's Wilshire Boulevard frontage was replaced with the privately maintained, publicly accessible open space area that is currently planned for the northeast corner of the Project Site. Trips associated with the previously proposed commercial building were estimated based on Land Use Code 820 (Shopping Center). As discussed in Appendix G of the Transportation Study, while the commercial building would have generated 107 daily trips on a weekday, the land use characteristics of the open space area are such that the area would be a "passive" trip generator, serving residents and visitors of the Project Site as well as passers-by rather than generating substantial new vehicular trips to the Project Site. Therefore, the Transportation Study overestimates the vehicle trips associated with the Project and represents a conservative analysis.*

Table IV.J-4
Project Trip Generation

Trip Generation Rates								
			A.M. Peak Hour[a]			P.M. Peak Hour[b]		
Land Use	**Size**	**Daily[a]**	**Inbound**	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Apartment (ITE 220)	per du	6.65	20%	80%	0.51	65%	35%	0.49
General Office Building (ITE 710)	per 1,000 sf	11.03	88%	12%	1.56	17%	83%	1.83
Shopping Center (ITE 820)[d]	per 1,000 sf	42.70	62%	38%	0.96	48%	52%	10.16
Supermarket (ITE 850)	per 1,000 sf	102.24	62%	38%	3.40	51%	49%	10.34
Trip Generation Estimates								
			A.M. Peak Hour			**P.M. Peak Hour**		
Land Use	**Size**	**Daily[a]**	**Inbound**	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Project								
Office Building	357,100 sf	3,939	490	67	557	111	542	653
Less Transit/Walk In[c]	15%	(591)	(74)	(10)	(84)	(17)	(81)	(98)
Apartment	376 du	2,500	38	154	192	120	64	184
Less Transit/Walk In[c]	15%	(375)	(6)	(23)	(29)	(18)	(10)	(28)
Commercial[d]	5,000 sf	214	3	2	5	24	26	50
Less Pass-By[e]	50%	(107)	(2)	(1)	(3)	(12)	(13)	(25)
Subtotal		*5,580*	*449*	*189*	*638*	*208*	*528*	*736*
Existing Use								
Office Building	357,100 sf	3,939	490	67	557	111	542	653
Less Transit/Walk In[c]	15%	(591)	(74)	(10)	(84)	(17)	(81)	(98)
Supermarket	42,900 sf	4,386	91	55	146	226	218	444
Less Pass-By[e]	40%	(1,754)	(36)	(22)	(58)	(90)	(87)	(177)
Subtotal		*5,980*	*471*	*90*	*561*	*230*	*592*	*822*
Total Net New Trips (at Site Driveways)		**(2,047)**	**(56)**	**78**	**22**	**(100)**	**(138)**	**(238)**
Total Net New Trips (with Pass-By Credit)		**(400)**	**(22)**	**99**	**77**	**(22)**	**(64)**	**(86)**

Table IV.J-4 (Continued)
Project Trip Generation

Land Use	Size	Daily[a]	A.M. Peak Hour			P.M. Peak Hour		
			Inbound	Outbound	Total	Inbound	Outbound	Total

du = dwelling unit; sf = square feet

[a] *Daily and A.M. peak-hour trip-generation rates from Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.*

[b] *P.M. peak-hour trip-generation rates from the West Los Angeles TIMP Specific Plan, City of Los Angeles, 1997. P.M. peak-hour inbound/outbound splits from Trip Generation, 9th Edition.*

[c] *Project is located 0.25 mile from Metro Rapid Bus route: 15 percent credit, per LADOT guidelines.*

[d] *As discussed in the Supplemental Trip Generation and Traffic Analysis for the Landmark Project, prepared by Gibson Transportation Consulting, Inc., which is included as Appendix G of the Traffic Study, changes were made to the proposed site plan subsequent to the preparation of the Project's Transportation Study. Specifically, an approximately 4,700-square foot commercial building that was previously planned along the Project Site's Wilshire Boulevard frontage was replaced with the privately maintained, publicly accessible open space area that is currently planned for the northeast corner of the Project Site. As discussed in Appendix G of the Traffic Study, while the commercial building would have generated 107 daily trips on a weekday, the land use characteristics of the open space area are such that the area would be a "passive" trip generator, serving residents and visitors of the Project Site as well as passers-by rather than generating substantial new vehicular trips to the Project Site. Therefore, the Transportation Study overestimates the vehicle trips associated with the Project and represents a conservative analysis.*

[e] *Pass-by credit per LADOT guidelines. It should be noted that pass-by reductions are not included at site driveways.*

Source: Gibson Transportation Consulting, Inc., June 2014.

As discussed in Section II, Project Description, of this Draft EIR, the existing supermarket on the Project Site was vacated in March, 2013. For a supplementary analysis of Project impacts that does not take any credits or offsets for the supermarket operations, see Section VI, Supplementary Baseline Analysis of this Draft EIR.

As shown in Table IV.J-4 on page IV.J-40, the Project is estimated to generate a net reduction of 400 daily trips, including a net increase of 77 trips during the A.M. peak hour (net reduction of 22 inbound trips and 99 outbound trips) and a net reduction of 86 trips during the P.M. peak hour (net reduction of 22 inbound trips and a net reduction of 64 outbound trips).

(b) Project Trip Distribution and Assignment

The traffic volumes for both the existing supermarket use and the Project were distributed and assigned to the local street system based on demographics and existing/anticipated travel patterns in the Study Area. Localized routes of travel through the Study Area were developed based on existing traffic patterns and relative travel times on various corridors and the level of accessibility of the route to and from the Project Site. The Project trip distribution was developed to reflect the proposed changes to the access points on Stoner Avenue and Granville Avenue.

Traffic volumes for both the existing supermarket use and the Project were distributed to the surrounding street system based on the following general pattern: approximately 20 percent of the traffic is generated to/from the north, 30 percent to/from the east, 25 percent to/from the south, and 25 percent to/from the west. The percentages generated on Granville Avenue from the south were split between trips from the west on Texas Avenue and trips from the south on Westgate Avenue. The distribution of Project traffic through the study intersections is illustrated in Figure 8 in the Transportation Study included in Appendix J.1 of this Draft EIR. The distribution pattern was reviewed and approved by LADOT.

The trip distribution pattern was applied to the trip generation to develop the net new Project traffic volumes at the study intersections, as illustrated in Figure 9 in the Transportation Study.

(c) Intersection Capacity

(i) Existing With Project Conditions

As shown on Table IV.J-5 on page IV.J-43, as is the case under Existing Conditions, under the Existing With Project Conditions, three of the signalized study intersections are projected to operate at LOS C or worse during both the morning and afternoon peak hours.

Table IV.J-5
Existing With Project Conditions—Signalized Intersection Peak-Hour Levels of Service and Impacts

No	Intersection	Peak Hour	Existing		Existing With Project			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact[a]
1.	Westgate Avenue & Wilshire Boulevard	A.M.	0.317	A	0.321	A	0.004	No
		P.M.	0.322	A	0.321	A	-0.001	No
2.	Granville Avenue & Wilshire Boulevard	A.M.	0.288	A	0.301	A	0.013	No
		P.M.	0.307	A	0.298	A	-0.009	No
4.	Barrington Avenue & Wilshire Boulevard	A.M.	0.567	A	0.575	A	0.008	No
		P.M.	1.552	F	1.528	F	-0.024	No
5.	Federal Avenue & Wilshire Boulevard	A.M.	0.800	C	0.807	D	0.007	No
		P.M.	1.758	F	1.749	F	-0.009	No
6.	Barrington Avenue & Texas Avenue	A.M.	0.573	A	0.585	A	0.012	No
		P.M.	0.791	C	0.783	C	-0.008	No

V/C = Volume-to-capacity ratio per LADOT CMA calculations
LOS = Level of service based on V/C
[a] *Based on Traffic Study Policies and Procedures (LADOT, June 2013).*
Source: Gibson Transportation Consulting, Inc., June 2014.

Two intersections along Wilshire Boulevard (Intersection 4: Barrington Avenue & Wilshire Boulevard and Intersection 5: Federal Avenue & Wilshire Boulevard), are anticipated to operate at LOS F during the afternoon peak hour.

The Project would result in minor increases or minor decreases in the V/C ratios at the signalized study intersections, but none of the increases would exceed the threshold for a significant impact. In addition, based on the analysis of the unsignalized intersection of Stoner Avenue and Wilshire Boulevard (Study Intersection No. 3), the installation of a traffic signal is not warranted under Existing With Project Conditions. As such, pursuant to the thresholds of significance stated above, Project impacts during Existing With Project Conditions would be less than significant, and no mitigation is required.

(ii) Future With Project Conditions

As shown in Table IV.J-6 on page IV.J-45, three of the signalized study intersections are projected to operate at LOS D or worse during both the morning and afternoon peak hours under Future With Project Conditions. Two intersections along Wilshire Boulevard (Intersection 4: Barrington Avenue and Wilshire Boulevard and Intersection 5: Federal Avenue and Wilshire Boulevard) are anticipated to continue to operate at LOS F during the afternoon peak hour under Future With Project Conditions.

The Project would result in minor increases or minor decreases in the V/C ratios at the signalized study intersections but none of the increases would exceed the threshold for a significant impact. In addition, based on the analysis of the unsignalized intersection of Stoner Avenue and Wilshire Boulevard (Study Intersection No. 3), the installation of a traffic signal is not warranted under Future With Project Conditions. Pursuant to the thresholds of significance above that are based on LOS and a sliding scale of project-related V/C ratios that are reduced as the LOS increases, Project impacts during Future With Project Conditions would be less than significant, and no mitigation is required.

(d) Regional Transportation System (Freeway) Impacts

(i) CMP Freeway Analysis

Based on the Project trip-generation estimates shown above in Table IV.J-4 on page IV.J-40, the Project is expected to generate approximately 77 net new trips in the morning peak hour and a reduction in trips of approximately 86 net trips in the afternoon peak hour. As shown in Figure 9 in the Transportation Study included in Appendix J.1 of this Draft EIR, there would be fewer than 150 A.M. or P.M. peak-hour trips distributed to the freeways in the Project area (e.g., the I-405). Therefore, the Project's impacts on CMP freeway facilities would be less than significant, and no mitigation is required.

Table IV.J-6
Future With Project Conditions—Signalized Intersection Peak-Hour Levels of Service and Impacts

No.	Intersection	Peak Hour	Future Without Project		Future With Project			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact[a]
1.	Westgate Avenue & Wilshire Boulevard	A.M.	0.336	A	0.341	A	0.005	No
		P.M.	0.349	A	0.348	A	-0.001	No
2.	Granville Avenue & Wilshire Boulevard	A.M.	0.318	A	0.331	A	0.013	No
		P.M.	0.332	A	0.322	A	-0.010	No
4.	Barrington Avenue & Wilshire Boulevard	A.M.	0.623	B	0.631	B	0.008	No
		P.M.	1.718	F	1.693	F	-0.025	No
5.	Federal Avenue & Wilshire Boulevard	A.M.	0.861	D	0.869	D	0.008	No
		P.M.	1.898	F	1.889	F	-0.009	No
6.	Barrington Avenue & Texas Avenue	A.M.	0.693	B	0.705	C	0.012	No
		P.M.	0.895	D	0.887	D	-0.008	No

V/C = Volume-to-capacity ratio per LADOT CMA calculations
LOS = Level of service based on V/C
[a] *Based on Traffic Study Policies and Procedures (LADOT, June 2013).*
Source: Gibson Transportation Consulting, Inc., June 2014.

(ii) CMP Arterial Monitoring Station Analysis

As shown in Figure 9 in the Transportation Study, the Project is estimated to generate fewer than the 50 trips during the peak hours at the monitoring stations at Santa Monica Boulevard and Wilshire Boulevard and at Bundy Drive and Santa Monica Boulevard. Therefore, the Project's impacts on CMP arterial monitoring stations would be less than significant, and no mitigation is required.

(iii) Caltrans Analysis

The *Agreement between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures* (State of California and City of Los Angeles, revised January 2016) was reviewed to determine the potential study locations on state freeways (e.g., freeway ramp and mainline segments) that may be required for analysis. Based on this review and as demonstrated by the worksheets presented in the Transportation Study, the Project does not meet any of the criteria established, and thus, an analysis of freeway ramps or mainline segments is not required.

(e) Street Segment Analysis

As shown in Table IV.J-7 on page IV.J-47, application of the LADOT significant impact criteria to the Existing With Project conditions indicates that the Project would not result in any significant impacts at any of the street segments. A net decrease in traffic volumes (i.e., up to 4 percent) is anticipated at the study street segments with the development of the Project. As the Project results in a decrease in ADT volumes, it can be concluded that the Project would similarly not result in significant impacts at any of the street segments in the future conditions. Therefore, the Project's impacts on street segments would be less than significant, and no mitigation is required.

(f) Access and Circulation

The intersections nearest the proposed vehicular access points (i.e., the existing vehicular access points to the plaza level that would remain the same under the Project, the existing access ramp on Stoner Avenue that would be relocated, and the new service and loading docks for the residential building would be constructed to the south of the residential building with access from Stoner Avenue and the adjacent alley) are Granville Avenue and Wilshire Boulevard and Stoner Avenue and Wilshire Boulevard. As shown in Table IV.J-6 on page IV.J-45, the signalized intersection of Wilshire Boulevard and Granville Avenue is projected to operate at LOS A during the A.M. and P.M. peak hours under Future With Project Conditions. The unsignalized intersection of Stoner Avenue and Wilshire Boulevard is also projected to operate at acceptable conditions (i.e., LOS E or better) during the A.M. and P.M. peak hours under Future With Project Conditions.

Table IV.J-7
Street Segment Analysis—Existing With Project Conditions

No.	Street Segment	Average Daily Traffic (ADT) Volumes				Increase in ADT	Impact[a]
		Existing	Project Distribution	Project[b]	Existing With Project		
A	Stoner Avenue north of Texas Avenue	2,094	20%	(80)	2,014	-4%	No
B	Granville Avenue north of Texas Avenue	1,949	10%	(40)	1,909	-2%	No
C	Texas Avenue east of Stoner Avenue	7,083	20%	(80)	7,003	-1%	No

[a] *Traffic Study Policies and Procedures (LADOT, June 2013) deems a transportation impact at an intersection "significant" based on the following criteria:*

Projected ADT with Project (Final ADT)	*Increase in ADT*
0 to 999	*120 or more*
1,000 to 1,999	*12% or more of final ADT*
2,000 to 2,999	*10% or more of final ADT*
3,000 or more	*8% or more of final ADT*

[b] *The project is expected to result in a decrease of 400 daily trips.*

Source: Gibson Transportation Consulting, Inc., June 2014.

Therefore, Project impacts with regard to access and circulation would be less than significant, and no mitigation is required.

(g) Public Transit

As shown in Table IV.J-4 on page IV.J-40, the Project is expected to result in a net increase of approximately 77 net A.M. peak-hour trips and a net reduction of approximately 86 net P.M. peak-hour trips. Assuming an AVO of 1.4 and mode split of 7 percent, the Project would result in approximately 8 net new transit trips in the A.M. peak-hour and a net reduction of approximately 8 transit trips in the P.M. peak hour.

The Project Site is well-served by numerous established transit routes and these trips are spread across the commuter network. With approximately 31 buses during the morning A.M. peak hour serving Wilshire Boulevard adjacent to the Project Site, the Project would result in an average increase of less than one transit trip per bus during the A.M. peak hour, which would be negligible increase. Thus, the existing transit service in the vicinity would adequately accommodate the Project-generated transit trips during the A.M. peak hour. Because the Project is estimated to generate a net reduction in P.M. peak-hour trips, the Project is not anticipated to have a significant impact on the transit system during the P.M. peak hour. Thus, based on the calculated number of generated transit trips and available transit capacity, impacts on existing and future transit services in the Project vicinity would be less than significant, and no mitigation is required.

(h) Parking

As shown in Table IV.J-8 on page IV.J-49, based on the residential parking requirements set forth in Section 12.22.A25d(1) of the LAMC (commonly referred to as Density Bonus Parking Option 1) and the office parking requirements set forth in Section 12.21.A4 of the LAMC, the Project would be required to provide 1,090 parking spaces including 447 residential parking spaces and 643 office parking spaces. The office parking reflects the proposed 10 percent reduction pursuant to Section 12.24Y of the LAMC for sites located less than 1,500 feet from a transit facility. The Project proposes to provide a total of 1,122 parking spaces. Even with approval of the 10 percent reduction for the office use, the Project would still exceed the applicable parking requirements of the LAMC.

As shown in Table IV.J-8, the Project would be required to provide 414 bicycle parking spaces for the new residential use. In total, 447 residential bicycle parking spaces would be provided.

Based on the analysis above, therefore, impacts related to automobile and bicycle parking would be less than significant and no mitigation is required.

Table IV.J-8
Project Automobile and Bicycle Parking Analysis

Land Use	Quantity	Required Spaces per Unit[a]	Total
Residential Automobile Parking			
Studio DU	79 DU	1	79
2 Bedroom DU	226 DU	1	226
4+ Bedroom DU	71 DU	2	142
Total Residential Automobile Parking Required	*376 DU*		*447*
Office Automobile Parking			
Office	357,100 sf	2/1,000	714
Subtotal Automobile Parking Required			**1,161**
10 percent reduction in Required Office Parking Pursuant to LAMC Section 12.24Y			**(71)**
Total Automobile Parking Required			**1,090**
Total Automobile Parking Provided			**1,122**
Residential Bicycle Parking			
Long-Term	376 DU	1	376
Short-Term	376 DU	1/10	38
Total Residential Bicycle Parking Required	*376 DU*		*414*
Total Bicycle Parking Required[b]			**414**
Total Bicycle Parking Provided			**447**

DU = dwelling unit

sf = square feet

[a] *Residential parking requirements are pursuant to LAMC Section 12.22.A25d(1) (commonly referred to as Density Bonus Parking Option 1). Office parking requirements are pursuant to LAMC Section 12.21.A4 and LAMC Section 12.24Y.*

[b] *No bicycle parking is required for the existing office building.*

Source: Eyestone Environmental, 2016.

(i) Bicycle, Pedestrian, and Vehicular Safety

As shown in Figure II-7 in Section II, Project Description, of this Draft EIR, the Project would retain the existing vehicular access points to the existing plaza level off of Stoner Avenue and Granville Avenue, but would convert both points into two-way driveways. Each driveway would be approximately 42 feet wide at the curb line and would narrow to approximately 24 feet wide on-site, which would provide adequate width for two-way traffic. A new internal circular driveway would be created at the center to provide

vehicular drop-off and pick-up for the residential building and access to the surface parking garage located in the pool deck portion of the proposed building. The current two access points to the subterranean parking garage from Stoner Avenue and Granville Avenue would remain the same; however, the existing access ramp on Stoner Avenue would be relocated approximately 10 feet to the south. New service and loading docks for the residential building would be constructed at the south side of the residential building with access from Stoner Avenue and the adjacent alley. Deliveries and trash collection would be accessed from the alley. The trash collection area would be enclosed and would not be visible from the residential area to the south.

All proposed driveways would operate with unrestricted movements for both inbound and outbound traffic. Project driveways would be located on low volume local streets. Based on a review of the conceptual site plan, the proposed driveways would provide adequate depth and storage to allow vehicle circulation without impeding or disrupting traffic flow on local or arterial streets. Furthermore, driveway designs would be subject to LADOT approval as part of the City's standard review and permitting process. While the Project would retain the existing vehicular access points to the plaza level off of Stoner Avenue and Granville Avenue, the existing access ramp on Stoner Avenue would be relocated, and new service and loading docks for the residential building would be constructed. The previously mentioned new driveway cuts are not expected to create pedestrian, vehicular, or bicycle conflicts on Stoner Avenue or the alley adjacent to the Project Site.

Under the Project, three existing pedestrian access points would be retained (off of Stoner Avenue, Wilshire Avenue, and Granville Avenue) and two new pedestrian access points would be created. One pedestrian access point from Stoner Avenue south of the proposed surface parking lot in the southeast portion of the Project Site would run from the street to the main entry of the residential building. Another one would run from Stoner Avenue into the proposed open space area at the northeast corner of the Project Site. As such, the Project would improve pedestrian flow through and around the Project Site. Under the Project, bicycle access would be provided via each of the pedestrian access points. Thus, as with improved pedestrian access, the Project would also improve bicycle access. In addition, the Project would not result in physical changes that would disrupt bicycle access along Stoner Avenue, Granville Avenue, or Wilshire Boulevard. Furthermore, the Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. Therefore, the Project would not substantially increase hazards to bicyclists, pedestrians, or vehicles. Impacts related to bicycle, pedestrian, and vehicular safety would be less than significant, and no mitigation is required.

(j) Other—Air Traffic Patterns and Safety

The Initial Study for the Project, which is included in Appendix A of this Draft EIR, recommended that the EIR analyze potential impacts to air traffic patterns and safety. First, the Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. The proposed residential building would reach a maximum height of 349 feet above grade level, as measured from the lowest adjacent grade elevation along Granville Avenue. Rooftop structures, including a helipad and a nine-foot screen wall to conceal future heating/ventilating/air conditioning (HVAC) and other equipment, would not exceed 380 feet above grade level (as measured from the same reference point). Based on an airspace feasibility study that was conducted for the Project, which is included in Appendix J.4 of this Draft EIR, the Project would not result in any airspace hazards. The nearest airport is the Santa Monica Municipal Airport, located approximately 1.77 miles southeast of the Project Site. The proposed building would be located outside of the protected approach and departure airspaces of that airport. Furthermore, the Project would be required to comply with applicable FAA requirements regarding rooftop lighting for high-rise structures and would be required to implement noticing requirements and obtain a No Hazard Determination from the FAA in accordance with the applicable provisions set forth for high-rise structures in Title 49 U.S.C. Section 44718 (Section 44718). Impacts related to air traffic patterns and safety would therefore be less than significant, and no mitigation is required.

(k) Consistency with Regulatory Framework

As discussed above, the Project would be consistent with the requirements related to CMP freeway facilities, the CMP arterial monitoring stations, and the transit system analysis. In addition, the Transportation Study was performed in accordance with the procedures and trip generation rates outlined in the WLA TIMP, and the Project would implement the relevant requirements of the WLA TIMP.

As demonstrated in Table IV.G-2 in Section IV.G., Land Use, of this Draft EIR, the Project would be generally consistent with the traffic-related objectives and policies that support the goals of the West Los Angeles Community Plan. By concentrating high-density development along the Wilshire Boulevard commercial corridor, and adjacent to a Mixed-Use Boulevard identified in the Community Plan and the General Plan Framework, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, reducing vehicle miles traveled. The Project is an infill development project within an urbanized area that would concentrate new residential and open space uses along a Comprehensive Transit Enhanced Street (i.e., Wilshire Boulevard) designated in Mobility Plan 2035. Furthermore, the Project would locate new housing along the Wilshire Boulevard commercial corridor in proximity to the Westwood

employment hub. Approximately 13 bus lines serve the Project vicinity and the Project Site also is located directly adjacent to a Mixed-Use Boulevard. The Mixed-Use Boulevard designation encourages pedestrian-friendly uses. As previously discussed, the Project Site is rated with a score of 72 of 100 possible points and defined as "Very Walkable so most errands can be accomplished on foot." In addition, the Project would provide approximately 447 bicycle parking spaces for Project residents. Therefore, consistent with the objectives and policies that support the goals of the West Los Angeles Community Plan and requirement, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and assist in maintaining acceptable levels of service for area roadways.

(3) Analysis Under No Supermarket Scenario

As discussed in detail in Section VI. Baseline Discussion, the analysis in the Project's Transportation Study, which forms the basis for the impact analysis above, appropriately includes trip credits for the existing supermarket based on the rates in Trip Generation, 9th Edition, Institute of Transportation Engineers, and also factors in a "pass-by" credit per LADOT Guidelines. Nonetheless, for informational purposes, this subsection of the Draft EIR provides a discussion of the theoretical operational effects of the Project that would occur if there was no historical supermarket use on the Project Site and no existing supermarket building in which operations could resume at any time without any discretionary City approval. Specifically, the discussion evaluates impacts against the current short-term interim condition in which the supermarket is vacant. ***Under this scenario, referred to hereafter as the No Supermarket Scenario, all Project impacts are overstated and do not represent significant Project impacts under CEQA***.

(a) Trip Generation

As shown in Table IV.J-9 on page IV.J-53, the No Supermarket Scenario would generate a net increase of 2,232 daily trips compared to existing conditions, including a net increase of 165 trips during the A.M. peak hour (net increase of 33 inbound trips and 132 outbound trips) and a net increase of 181 trips during the P.M. peak hour (net increase of 114 inbound trips and a net increase of 67 outbound trips).

(b) Intersection Capacity

(i) Existing With Project Conditions

As shown in Table IV.J-10 on page IV.J-55, assuming the same trip distribution and assignment as the Draft EIR analysis above, the No Supermarket Scenario results in increases in the V/C ratios at the signalized study intersections under Existing With

Table IV.J-9
No Supermarket Scenario—Project Trip Generation

Trip-Generation Rates								
			A.M. Peak Hour[a]			P.M. Peak Hour[b]		
Land Use	**Size**	**Daily[a]**	**Inbound**	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Apartment (ITE 220)	per du	6.65	20%	80%	0.51	65%	35%	0.49
General Office Building (ITE 710)	per 1,000 sf	11.03	88%	12%	1.56	17%	83%	1.83
Shopping Center (ITE 820)	per 1,000 sf	42.70	62%	38%	0.96	48%	52%	10.16
Supermarket (ITE 850)	per 1,000 sf	102.24	62%	38%	3.40	51%	49%	10.34
Trip-Generation Estimates								
			A.M. Peak Hour			P.M. Peak Hour		
Land Use	**Size**	**Daily**	**Inbound**	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Project								
Office Building	357,100 sf	3,939	490	67	557	111	542	653
Less Transit/Walk In[c]	15%	(591)	(74)	(10)	(84)	(17)	(81)	(98)
Apartment	376 du	2,500	38	154	192	120	64	184
Less Transit/Walk In[c]	15%	(375)	(6)	(23)	(29)	(18)	(10)	(28)
Commercial[e]	5,000 sf	214	3	2	5	24	26	50
Less Pass-by[d]	50%	(107)	(2)	(1)	(3)	(12)	(13)	(25)
Subtotal		*5,580*	*449*	*189*	*638*	*208*	*528*	*736*
Existing Uses								
Office Building (To Remain)	357,100 sf	3,939	490	67	557	111	542	653
Less Transit/Walk In[c]	15%	(591)	(74)	(10)	(84)	(17)	(81)	(98)
Supermarket (To be Removed)	42,900	0	0	0	0	0	0	0
Subtotal		*3,348*	*416*	*57*	*473*	*94*	*461*	*555*

Table IV.J-9 (Continued)
No Supermarket Scenario—Project Trip Generation

Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
			Inbound	Outbound	Total	Inbound	Outbound	Total
No Supermarket Scenario Total Net New Trips (with Pass-By Credit)		**2,232**	**33**	**132**	**165**	**114**	**67**	**181**
Draft EIR Analysis Total Net New Trips (with Pass-By Credit)		**(400)**	**(22)**	**99**	**77**	**(22)**	**(64)**	**(86)**
Net Change in Trip Generation (No Supermarket Scenario vs. Draft EIR Analysis)		**2,632**	**55**	**33**	**88**	**136**	**131**	**267**

[a] *Daily and A.M. peak-hour trip-generation rates from Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.*

[b] *P.M. peak-hour trip-generation rates from the West Los Angeles TIMP Specific Plan, City of Los Angeles, 1997. P.M. peak-hour inbound/outbound splits from Trip Generation.*

[c] *Project is located 0.25 mile from a Metro Rapid Bus route: 15-percent credit per LADOT guidelines.*

[d] *Pass-by credit per LADOT guidelines. It should be noted that pass-by reductions are not included at site driveways.*

[e] *As discussed in the Supplemental Trip Generation and Traffic Analysis for the Landmark Project, prepared by Gibson Transportation Consulting, Inc which is included in Appendix G of the Traffic Study, changes were made to the proposed site plan subsequent to the preparation of the Project's Transportation Study. Specifically, an approximately 4,700-square foot commercial building that was previously planned along the Project Site's Wilshire Boulevard frontage was replaced with the privately maintained, publicly accessible open space area that is currently planned for the northeast corner of the Project Site. As discussed in Appendix G of the Traffic Study, while the commercial building would have generated 107 daily trips on a weekday, the land use characteristics of the open space area are such that the area would be a "passive" trip generator, serving residents and visitors of the Project Site as well as passers-by rather than generating substantial new vehicular trips to the Project Site. Therefore, the Transportation Study overestimates the vehicle trips associated with the Project and represents a conservative analysis.*

Source: Gibson Transportation Consulting, Inc., 2015.

Table IV.J-10
No Supermarket Scenario
Signalized Intersection Peak-Hour Levels of Service and Impacts
Existing With Project Conditions

		Existing		Existing with Project			
Intersection	**Peak Hour**	**V/C**	**LOS**	**V/C**	**LOS**	**Change in V/C**	**Exceed Threshold?[a]**
1. Westgate Ave. & Wilshire Blvd.	A.M.	0.315	A	0.321	A	0.006	No
	P.M.	0.316	A	0.321	A	0.005	No
2. Granville Ave. & Wilshire Blvd.	A.M.	0.281	A	0.300	A	0.019	No
	P.M.	0.284	A	0.298	A	0.014	No
4. Barrington Ave. & Wilshire Blvd.	A.M.	0.559	A	0.575	A	0.016	No
	P.M.	1.475	F	1.528	F	0.053	**Yes**
5. Federal Ave. & Wilshire Blvd.	A.M.	0.797	C	0.807	D	0.010	No
	P.M.	1.738	F	1.746	F	0.008	No
6. Barrington Ave. & Texas Ave.	A.M.	0.563	A	0.585	A	0.022	No
	P.M.	0.773	C	0.782	C	0.009	No

V/C = volume-to-capacity ratio per LADOT CMA calculations
LOS = level of service based on V/C
[a] *Based on the LADOT Traffic Study Policies and Procedures (June 2013).*
Source: Gibson Transportation Consulting, Inc., June 2014.

Project Conditions. Specifically, three of the signalized study intersections are projected to operate at LOS C or worse during both the morning and afternoon peak hours (as is the case under Existing Conditions). One intersection along Wilshire Boulevard (Federal Avenue and Wilshire Boulevard) is anticipated to operate at LOS D during the morning peak hour. Two intersections along Wilshire Boulevard (Barrington Avenue and Wilshire Boulevard as well as Federal Avenue & Wilshire Boulevard), are anticipated to operate at LOS F during the afternoon peak hour, as is the case under Existing Conditions.

Under the No Supermarket Scenario, the Project would exceed the significance threshold at the intersection of Barrington Avenue and Wilshire Boulevard during the afternoon peak hour under Existing With Project Conditions. Based on an analysis of the unsignalized intersection of Stoner Avenue and Wilshire Boulevard, the installation of a traffic signal would not be warranted, consistent with the conclusion of the Draft EIR analysis above. As set forth above, the No Supermarket Scenario overstates traffic volumes, and the increase in traffic is not considered to be a significant impact under CEQA.

(ii) Future With Project Conditions

As shown in Table IV.J-11 on page IV.J-57, assuming the same trip distribution and assignment as the Draft EIR analysis above, the No Supermarket Scenario results in increases in the V/C ratios at the signalized study intersections under Future With Project Conditions. Specifically, three of the signalized study intersections are projected to operate at LOS C or worse during both the morning and afternoon peak hours under Future With Project Conditions (as is the case under Future Without Project Conditions). Two intersections along Wilshire Boulevard (Barrington Avenue and Wilshire Boulevard as well as Federal Avenue and Wilshire Boulevard) are anticipated to continue to operate at LOS F during the afternoon peak hour, as is the case under Future Without Project Conditions.

Under the No Supermarket Scenario, the Project would exceed the significance threshold at the intersection of Barrington Avenue and Wilshire Boulevard during the afternoon peak hour under Future With Project Conditions. Based on an analysis of the unsignalized intersection of Stoner Avenue and Wilshire Boulevard, the installation of a traffic signal is not warranted, as was also concluded in the Draft EIR analysis. As set forth above, the No Supermarket Scenario overstates traffic volumes, and the increase in traffic is not considered a significant impact under CEQA.

(4) Regional Transportation System (Freeway) Impacts

Assuming the same trip distribution and assignment as the Draft EIR analysis above, there would be fewer than 150 A.M. or P.M. peak-hour trips distributed to the

Table IV.J-11
No Supermarket Scenario
Signalized Intersection Peak-Hour Levels of Service and Impacts
Future With Project Conditions

Intersection	Peak Hour	Future without Project		Future with Project			
		V/C	LOS	V/C	LOS	Change in V/C	Exceed Threshold[a]
1. Westgate Ave. & Wilshire Blvd.	A.M.	0.335	A	0.340	A	0.005	No
	P.M.	0.343	A	0.348	A	0.005	No
2. Granville Ave. & Wilshire Blvd.	A.M.	0.311	A	0.330	A	0.019	No
	P.M.	0.307	A	0.321	A	0.014	No
4. Barrington Ave. & Wilshire Blvd.	A.M.	0.615	B	0.631	B	0.016	No
	P.M.	1.648	F	1.690	F	0.042	**Yes**
5. Federal Ave. & Wilshire Blvd.	A.M.	0.859	D	0.869	D	0.010	No
	P.M.	1.878	F	1.886	F	0.008	No
6. Barrington Ave. & Texas Ave.	A.M.	0.683	B	0.705	C	0.022	No
	P.M.	0.877	D	0.885	D	0.008	No

V/C = volume-to-capacity ratio per LADOT CMA calculations
LOS = level of service based on V/C
[a] *Based on the LADOT Traffic Study Policies and Procedures (June 2013).*
Source: Gibson Transportation Consulting, Inc., June 2014.

freeways in the Project area (e.g., the I-405). Additionally, there would be fewer than 50 trips during the peak hours at the monitoring stations at Santa Monica Boulevard and Wilshire Boulevard and at Bundy Drive and Santa Monica Boulevard. Therefore, the No Supermarket scenario would not exceed the significance thresholds for Congestion Management Program (CMP) freeway facilities and arterial monitoring stations.

(a) Street Segment Analysis

(i) Existing With Project Conditions

As shown in Table IV.J-12 on page IV.J-59, a net increase in traffic volumes (i.e., 6 percent or greater) is anticipated at the study street segments under the No Supermarket Scenario. Under Existing With Project conditions, the No Supermarket Scenario would exceed the significance threshold at two of the street segments (Stoner Avenue [north of Texas Avenue] and Granville Avenue [north of Texas Avenue]). As set forth above, the No Supermarket Scenario overstates traffic volumes, and the increase in traffic is not considered a significant impact under CEQA.

(b) Future With Project Conditions

As shown in Table IV.J-13 on page IV.J-60, a net increase in traffic volumes (i.e., 6 percent or greater) is anticipated at the study street segments under the No Supermarket Scenario. Under Future With Project Conditions, the No Supermarket Alternative would exceed the significance threshold at two of the street segments (Stoner Avenue [north of Texas Avenue] and Granville Avenue [north of Texas Avenue]). As set forth above, the No Supermarket Scenario overstates traffic volumes and the increase in traffic is not considered a significant impact under CEQA.

(c) Access and Circulation

Access to the Project Site under the No Supermarket Scenario would be similar to that described for the Project above. The signalized intersection of Granville Avenue and Wilshire Boulevard and the unsignalized intersection of Stoner Avenue and Wilshire Boulevard are projected to operate at acceptable (i.e., LOS E or better) conditions during the A.M. and P.M. peak hours under Future With Project Conditions. These are the closest intersections to the Project Site. Therefore, the No Supermarket Scenario would not exceed the significance thresholds regarding access.

(d) Public Transit

As discussed above, under the No Supermarket Scenario, the Project would generated a net increase of 2,232 daily trips compared to existing conditions, including a net increase of 165 trips during the A.M. peak hour and a net increase of 181 trips during

Table IV.J-12
No Supermarket Scenario
Street Segment Analysis—Existing With Project Conditions

No.	Street Segment	Average Daily Traffic (ADT) Volumes				Increase in ADT	Exceed Threshold?[a]
		Existing (Year 2013)	Project Distribution	Project[b]	Existing With Project		
A	Stoner Avenue *north of Texas Avenue*	2,094	20%	446	2,540	21%	**Yes**
B	Granville Avenue *north of Texas Avenue*	1,949	10%	224	2,173	11%	**Yes**
C	Texas Avenue *east of Stoner Avenue*	7,083	20%	446	7,529	6%	No

[a] *The LADOT Traffic Study Policies and Procedures (June 2013) deems a transportation impact at an intersection "significant" based on the following criteria:*

Projected ADT with Project (Final ADT)	*Increase in ADT*
0 to 999	*120 or more*
1,000 to 1,999	*12% or more of final ADT*
2,000 to 2,999	*10% or more of final ADT*
3,000 or more	*8% or more of final ADT*

[b] *The Project without existing use credit is expected to result in 2,232 daily trips.*

Source: Gibson Transportation Consulting, Inc., June 2014.

the P.M. peak hour. Assuming an average vehicle occupancy (AVO) factor of 1.4 and mode split of 7 percent, the No Supermarket Scenario would result in approximately 16 net new transit trips in the A.M. peak hour and approximately 18 net new transit trips in the P.M. peak hour.

As discussed above, the Project Site is well-served by numerous established transit routes and these trips are spread across the commuter network. With approximately 31 buses during the morning A.M. peak hour and approximately 37 buses during the afternoon P.M. peak hour serving Wilshire Boulevard adjacent to the Project Site, the No Supermarket Scenario would result in an average increase of less than one transit trip per bus during the A.M. peak hour. Thus, the existing transit service in the vicinity would adequately accommodate the transit trips during both peak hours under the No Supermarket Scenario.

Table IV.J-13
No Supermarket Scenario
Street Segment Analysis—Future With Project Conditions

No.	Street Segment	Average Daily Traffic (ADT) Volumes					Increase in ADT	Exceed Threshold?[a]
		Existing (Year 2013)	Future Traffic Growth	Future Without Project	Project[b]	Future With Project		
A	Stoner Avenue *north of Texas Avenue*	2,094	85	2,179	446	2,625	20%	**Yes**
B	Granville Avenue *north of Texas Avenue*	1,949	79	2,028	224	2,252	11%	**Yes**
C	Texas Avenue *east of Stoner Avenue*	7,083	288	7,371	446	7,817	6%	No

[a] *The LADOT Traffic Study Policies and Procedures (June 2013) deems a transportation impact at an intersection "significant" based on the following criteria:*

Projected ADT with Project (Final ADT)	*Increase in ADT*
0 to 999	*120 or more*
1,000 to 1,999	*12% or more of final ADT*
2,000 to 2,999	*10% or more of final ADT*
3,000 or more	*8% or more of final ADT*

[b] *The project without existing use credit is expected to result in 2,232 daily trips.*

Source: Gibson Transportation Consulting, Inc., June 2015.

4. Cumulative Impacts

The Project, in conjunction with growth forecasted in the City through the Project buildout year, would cumulatively generate traffic, thus potentially resulting in cumulative impacts on traffic, access, and parking. Cumulative growth in the greater Project area includes 26 known development projects, as well as general ambient growth projected to occur as discussed above in Section 2.c on page IV.J-19. Furthermore, the proximity of Related Project No. 7 located at 11600–11620 Wilshire Boulevard and Related Project No. 16 located at 10955 West Wilshire Boulevard should be noted as traffic coordination with these projects would be required in accordance with Project Design Feature J-1. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, commercial, office, and institutional developments, as shown in Table 2 in the Transportation Study contained in Appendix J.1 of this Draft EIR.

a. Construction Impacts

The related projects are dispersed throughout the Project area and would draw upon a workforce from all parts of the Los Angeles region. Many of the construction workers are

anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. In addition, the haul truck routes for the related projects would be approved by the Department of Building and Safety according to the location of the individual construction site and the ultimate destination. The City's established review process would take into consideration overlapping construction projects and would balance haul truck routes to minimize the impacts of cumulative hauling on any particular roadway. Furthermore, as stated in Project Design Feature J-1, the Project's construction management plan would take into account and be coordinated with other construction management plans that are in effect or have been proposed for other projects in the immediate Project vicinity, specifically Related Project No. 7 located at 11600–11620 Wilshire Boulevard and Related Project No. 16 located at 10955 West Wilshire Boulevard. The final segment of the Wilshire BRT Project from Federal Avenue to Centinela Avenue is under construction (at the time of preparation of this Draft EIR) and is scheduled to open in late 2015.[15] Therefore, construction of the Wilshire BRT Project is not likely to coincide with construction of the Project. In conclusion, cumulative construction impacts would be less than significant.

b. Operational Impacts

The traffic models used in the above analysis incorporated forecasted traffic increases due to ambient growth as well as the related projects. Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, the regional transportation (freeway) system, street segments, and access as a result of the Project are accounted for in the analysis above. Potential cumulative impacts with regard to these issues were found to be less than significant, and no mitigation is required.

With regard to public transit, similar to the Project, the related projects would generate an overall increase in transit riders. The anticipated increased transit ridership associated with the Project and related projects is not expected to exceed the capacity of transit systems. The effect is a positive impact and is consistent with City land use and transportation policies to reduce traffic. Thus, cumulative impacts with regard to transit would be less than significant, and no mitigation is required.

With regard to parking and bicycle, pedestrian, and vehicular safety, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access/circulation would be maintained in the vicinity of the Project Site. Thus,

[15] *Metro, Wilshire Bus Rapid Transit Project, www.metro.net/projects/wilshire/, accessed October 8, 2015.*

cumulative impacts with regard to parking and bicycle, pedestrian, and vehicular safety would be less than significant, and no mitigation is required.

With regard to air traffic patterns and safety, it is anticipated that future related projects meeting applicable height requirements would be subject to FAA requirements to ensure that air traffic patterns and safety would not be impacted in the vicinity of the Project Site. Thus, cumulative impacts with regard to air traffic patterns and safety would be less than significant, and no mitigation is required.

5. Mitigation Measures

Project-level and cumulative impacts with regard to traffic, access, and parking would be less than significant with the compliance of the regulatory requirements and implementation of the project design features above. Therefore, no mitigation measures are required.

6. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to traffic, access, and parking would be less than significant.