

**CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL
QUALITY ACT (CEQA)
TRANSPORTATION THRESHOLDS**

LOS ANGELES CEQA TRANSPORTATION THRESHOLDS

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TRANSPORTATION THRESHOLDS

I. INTRODUCTION AND BACKGROUND

Nothing in these thresholds is intended to affect the authority or responsibility of City decisionmakers in selecting and relying on thresholds of significance pursuant to CEQA Guidelines Section 15064(b)(2) and 15064.7. As such, in addition to the thresholds below, City decisionmakers may use thresholds on a case-by-case basis as necessary and appropriate to comply with CEQA and as supported by substantial evidence. Additionally, City Departments are authorized to adopt additional screening criteria and thresholds of significance to supplement the following transportation thresholds as they deem necessary and appropriate to analyze their projects in compliance with the requirements of CEQA Guidelines Section 15064.7(b). Nothing in these thresholds is intended to affect the authority of City Departments to adopt implementing guidelines.

A. OVERVIEW

This issue area covers impacts related to transportation system. In 2013, when Governor Edmund G. Brown Jr. signed Senate Bill (SB) 743 into law, the Governor's Office of Planning and Research (OPR) was charged with developing new guidelines for evaluating transportation impacts under CEQA using methods that no longer focus on measuring automobile delay and level of service (LOS). SB 743 directed agencies to develop new guidelines that develop a transportation performance metric that can help promote: the reduction of greenhouse gas emissions, the development of multimodal networks, and a diversity of land uses. OPR's proposed updates to the CEQA guidelines in support of these goals¹ establish vehicle miles traveled (VMT) as the primary metric for evaluating a project's environmental impacts on the transportation system. The guidelines also require that the environmental assessment for a project consider whether the project may conflict with plans or policies addressing the circulation system, hazards due to design or incompatible issues, and inadequate emergency access.

Projects Addressed

Discretionary development projects, land use plans (e.g., community plans, area plans, specific plans), and transportation projects.

Not Covered in This Impact Area

- Air quality impacts associated with transportation (see Section 3.III. Air Quality)
- Greenhouse gas impacts associated with transportation (See Section 3.VIII. Greenhouse Gas Emissions)

¹ State of California, Governor's Office of Planning and Research, *Proposed Updates to the CEQA Guidelines, Final*, November 2017.

- Noise impacts associated with transportation (see Section XI. Noise)

B. THRESHOLDS OF SIGNIFICANCE

The thresholds of significance for impacts to the transportation system are the following Appendix G Environmental Checklist thresholds:

THRESHOLD T-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

THRESHOLD T-2 Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

T-2.1 For a land use project², would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?³

T-2.2 For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?⁴

THRESHOLD T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

THRESHOLD T-4: Would the project result in inadequate emergency access?

C. REGULATORY FRAMEWORK

The regulatory framework for transportation resources includes state, regional, and local regulations. Some of the primary plans and regulations that apply to transportation

² A land use project includes any discretionary action that either changes development capacity (such as a zone change or redesignation of a general plan land use) or results in new construction, additions or change of use.

³ Subdivision (b)(1) establishes the following criteria for analyzing transportation impacts of land use projects: “Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.”

⁴ Subdivision (b)(2) provides the following direction for analyzing transportation impacts of transportation projects: “Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.”

In Section F of their Technical Advisory, OPR provides further direction to lead agencies who determine that vehicle miles traveled is the appropriate measure of impact for transportation projects. (See OPR. Technical Advisory. November 2017).

resources are identified below. Detailed information regarding plans and policies identified below may be found in the Regulatory Framework Document.

STATE

- Assembly Bill 1358 (AB 1358), the California Complete Streets Act of 2008
- Senate Bill 375 (SB 375), the Sustainable Communities and Climate Protection Act of 2008
- Senate Bill 743 (SB 743)
- State of California, Governor's Office of Planning and Research, *Proposed Updates to the CEQA Guidelines, Final*, November 2017.
- State of California, Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, April 2018.

REGIONAL

- Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

LOCAL

- City of Los Angeles General Plan
- City of Los Angeles Framework Element
- City of Los Angeles Community Plans
- City of Los Angeles Mobility Plan 2035
- The pLAn for Healthy Los Angeles
- Los Angeles Municipal Code (LAMC)
- LADOT Transportation Assessment Guidelines
- Citywide Design Guidelines for Residential, Commercial, and Industrial Development
- LADOT Transportation Technology Strategy – Urban Mobility in a Digital Age
- LADOT Vision Zero Action Plan
- LADOT Vision Zero Corridor Plans

- Pedestrian Safety Action Plan (pending)
- The Sustainable City pLAn
- Walkability Checklist

II. SCREENING AND EVALUATION

As a first step in determining whether conditions exist that might indicate an environmental impact, a project is reviewed through the following screening and evaluation process. The screening and evaluation process includes a series of screening criteria that are used to determine whether any further analysis is required. If the project does not pass the screen, further research will be necessary, as described in Section III, to analyze whether the project may result in significant impacts related to the transportation system. If based on the instructions for the screening criteria the project passes the screen, no further analysis will be required for that threshold question, and a no impact determination can be made for that particular threshold.

GUIDANCE AND CONSIDERATIONS The Mobility Plan 2035 established policies to prioritize the safety of all road users when planning, designing and operating streets. In determining Threshold T-1, to assess if a project conflicts with a program, plan, ordinance, or policy, the analysis should consider the degree to which a project may hinder the safe and comfortable access to a project site from other locations, with a special focus on people relying on transit services or active transportation modes such as biking or walking. The metric of auto-vehicle delay shall not be used since the means to address vehicle travel capacity may conflict with the City's goal to reduce auto-vehicle miles traveled.

A transportation project may induce additional travel demand. Since travel demand is largely a function of project scale, while also influenced by location, a project's impact on the transportation system should be evaluated for new development activity or transportation projects that exceed the screening criteria described below.

SCREENING CRITERIA FOR THRESHOLD T-1

Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

If the answer is no to all of the following questions, further analysis will not be required for Threshold T-1, and a no impact determination can be made for that threshold:

Question 1a: Would the project generate a net increase of 250 or more daily vehicle trips?

How to Determine: See Section 2.1.2 in the LADOT Transportation Assessment Guidelines.

Sources: Project plans and LADOT's VMT Calculator.

Question 1b: Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e. street dedications, reconfigurations of curb line, etc.)?

How to Determine: For projects subject to dedication and improvement requirements under the Los Angeles Municipal Code (LAMC), determine the street designation and improvement standard for any project frontage along streets classified as an Avenue or Boulevard (as designated in the City's General Plan) using the Mobility Plan 2035, or Navigate LA. If any street fronting the project site is an Avenue or Boulevard and it is determined that additional dedication, or physical modifications to the public right-of-way are proposed or required, the answer to this question is yes. For projects not subject to dedication and improvement requirements under the Los Angeles Municipal Code, though the project does propose dedications or physical modifications to the public right-of-way, the answer to this question is yes.

Question 1c: Is the project on a lot that is ½ acre or more in total gross area, or is the project's frontage along a street classified as an Avenue or Boulevard (as designated in the Mobility Plan 2035) 250 linear feet or more, or is the project's frontage encompassing an entire block along an Avenue or Boulevard (as designated in the Mobility Plan 2035)?

How to Determine: Determine the project's total gross lot area (using Zimas); if greater than ½ acre the answer to this question is yes. Determine the classification of (b)1 the street(s) fronting the project site (as designated in the City's General Plan, or Navigate LA). If any street fronting the project site is an Avenue or Boulevard and the project's frontage along that street is 250 linear feet or more, the answer to this question is yes. If any street fronting the project site is an Avenue or Boulevard and the project's frontage encompasses an entire block along that street, the answer to this question is yes.

Sources: Project site plans, Navigate LA, City of Los Angeles General Plan, Zimas.

SCREENING CRITERIA FOR THRESHOLD T-2.1

For a land use project⁵, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?⁶

⁵ See footnote 2 for definition of a land use project.

⁶ This threshold relates to vehicle miles of travel generated by a land use development project.

If the answer is no to either Question 1 or 2, further analysis will not be required for Threshold T-2.1, and a no impact determination can be made for that threshold, unless the answer is 'yes' to questions 3 or 4:

Question 1: Would the land use project⁷ generate a net increase of 250 or more daily vehicle trips?

How to Determine: See Section 2.2.4 in the LADOT Transportation Assessment Guidelines.

Sources: Project plans, the LADOT Transportation Assessment Guidelines, and the VMT Calculator.

Question 2: Would the project generate a net increase in daily VMT?

How to Determine: See Section 2.2.4 in the LADOT Transportation Assessment Guidelines.

Sources: Project plans, LADOT Transportation Assessment Guidelines, and the VMT Calculator.

In addition to the above screening criteria, the portion of, or the entirety of a project that contains small-scale or local serving retail uses⁸ are assumed to have less than significant VMT impacts. If the answer to the following question is no, that portion of the project meets the screening criteria and a "no impact" determination can be made for the portion of the project that contains retail uses. However, if the retail project is part of a larger mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with the above screening criteria. Projects that include retail uses in excess of the screening criteria would need to evaluate the entirety of the project's vehicle miles traveled, as specified in Section 2.2.4 in the LADOT Transportation Assessment Guidelines.

Question 3: Would the Project or Plan located within a one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?

Sources: Project plans.

Question 4: If the project includes retail uses, does the portion of the project that contains retail uses exceed a net 50,000 square feet?

How to Determine: Review the project plans.

⁷ See footnote 2 for definition of a land use project.

⁸ The definition of retail for this purpose includes restaurant.

Sources: Project plans.

SCREENING CRITERIA FOR THRESHOLD T-2.2

For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?⁹

If the answer is no to the following question, further analysis will not be required for Threshold T-2.2, and a no impact determination can be made for that threshold:

Question 1: Would the project include the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle (HOV) lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges (except managed lanes, transit lanes, bicycle lanes, and auxiliary lanes of less than one mile in length designed to improve roadway safety)?

How to Determine: Review the project plans.

Sources: Project plans.

SCREENING CRITERIA FOR THRESHOLD T-3

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

If the answer is yes to either of the following questions, further analysis will be required for Threshold T-3, and if the answer is no to both questions a no impact determination can be made for that threshold:

Question 1: Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?

Question 2: Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e. street dedications, reconfigurations of curb line, etc.)?

How to Determine: For projects subject to dedication and improvement requirements under the Los Angeles Municipal Code, determine the street designation and improvement standard for the any project frontage along streets classified as an Avenue or Boulevard (as designated in the City's General Plan) using the Mobility Plan 2035, or Navigate LA. If any street fronting the project site is an Avenue or Boulevard and it is determined that additional dedication, or physical modifications to the public right-of-way are proposed or required, the

⁹ This threshold relates to vehicle miles of travel induced by a transportation project that increases roadway capacity.

answer to this question is yes. For projects not subject to dedication and improvement requirements under the Los Angeles Municipal Code, though the project does propose dedications or physical modifications to the public right-of-way, the answer to this question is yes.

SCREENING CRITERIA FOR THRESHOLD T-4

Would the project result in inadequate emergency access?

III. IMPACT ANALYSIS

If an impact threshold was not screened out using the Screening Criteria or scoped out from the initial study under the Scope of Analysis, then the City should consider whether there will be an impact to any transportation system resources under the Appendix G Environmental Checklist threshold questions using the threshold analyses below.

A. THRESHOLD AREAS

The following section presents the thresholds as they should be analyzed for transportation system impacts. Each threshold is stated and is followed by a series of questions that the user should answer to determine the extent to which the project may cause an impact under the threshold. Each question has a corresponding criteria that provides direction to the user to best determine the answer.

THRESHOLD T-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

To determine if there is an impact under the threshold above, depending on whether you have a project or a plan, you will need to address the following:

Development Project¹⁰ Question 1: Would the project conflict with applicable program, plans, ordinances or policies addressing the circulation system?

How to Determine: The project will have a potential impact if:

- The project is inconsistent with transportation-related policies applicable to the proposed project. Determine potential impact with respect to consistency with plans, ordinances, and policies based on overall consistency with each program/plan/ordinance/policy.
- The determination of impact for this threshold is based on a nuanced consideration of overall plan, ordinance, and policy consistency. An impact determination would result if (1) the project directly conflicts with a standard established by a plan, policy or ordinance, and the finding(s) that govern relief cannot be made, and (2) that standard is adopted to protect the environment. In general, transportation standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that generally conforms with, and does

¹⁰ Development projects are a subset of land use projects where the intended project outcome in terms of site plans, use and building permits are well enough defined to inform a project level of analysis. They typically will involve new construction, additions or change of use, or can include a specific plan, general plan amendment and/or zone changes if the project outcome is specific as to the building use, intensity and placement to be completed over a predetermined time period.

not obstruct the City's development programs, ordinances, plans and policies will generally be considered to be consistent.

Sources: For guidance on addressing project specific questions, see Section 2.1 in LADOT Transportation Assessment Guidelines.

Plan Project¹¹ Question 1: Would the plan conflict with applicable plans, ordinances, or policies addressing the circulation system?

How to Determine: The plan will have a potential impact if:

- The plan is inconsistent with applicable State, Regional, and Local policy documents, such as the SCAG RTP/SCS and the City of Los Angeles *Mobility Plan 2035*. Determine potential impact with respect to consistency with plans, and policies based on overall consistency with each plan/policy.
- The determination of impact for this threshold is based on a nuanced consideration of overall plan, ordinance, and policy consistency. An impact determination would result if (1) the project directly conflicts with a standard established by a plan, policy or ordinance, and the finding(s) that govern relief cannot be made, and (2) that standard is adopted to protect the environment. In general, transportation standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that generally conforms with, and does not obstruct the City's development programs, ordinances, plans and policies will generally be considered to be consistent.
- The plan may propose new goals and policies that could be seen to conflict with, or be inconsistent with the existing plan. However, upon plan adoption, the updated plan may now internally align with the proposed goals and policies. As such, the proposed plan will be evaluated as to the consistency with the plan and policies as revised under the relevant legislative and policy making procedures.

Sources: For guidance on addressing plan specific questions, see Section 2.1 in LADOT Transportation Assessment Guidelines.

¹¹ Plan Projects are a subset of land use projects where the specific information is not available as to the sequence of discrete development projects that is necessary to inform a project level of analysis. Plan Projects typically will involve community plans, land use plans, or other general plan elements or citywide or areawide ordinances. Plan Projects can include specific plans, general plan amendments and/or zone changes if specific information is not available as to the building use, intensity and placement to be completed over a predetermined time period, and such assumptions of specific project outcomes would be too remote and speculative to inform a project-level analysis.

THRESHOLD T-2.1: For a land use project¹², would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

To determine if there is an impact under the threshold above, depending on whether you have a development project or a plan, you will need to address the following:

Development Project¹³ Question 1: Would the project cause substantial VMT per capita, per employee, or total (depending on project type)?

How to Determine: The project will have a potential impact if:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita in the Area Planning Commission (APC) in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee in the APC in which the project is located.
- For regional serving retail, entertainment projects, and/or event centers the project would result in a net increase in VMT.
- For other land use types, excluding retail uses, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee in the APC in which the project is located.
- For mixed-use projects, evaluate each project land use component separately using the criteria in the above bullets. Note, no separate evaluation is needed for the total sum retail components of a project that are under 50,000 square feet.

Sources: See Section 2.2 in LADOT Transportation Assessment Guidelines or project Frequently Asked Questions (FAQ).

Plan Project¹⁴ Question 1: Would the plan cause substantial VMT per service population?

How to Determine: The plan will have a potential impact if:

- The plan would result in an average VMT per service population in the horizon year that exceeds 15% below the regional average VMT per service population.

Sources: See Section 2.2 in LADOT Transportation Assessment Guidelines.

¹² See footnote 2 for definition of a Land Use Project.

¹³ See footnote 10 for definition of Development Projects.

¹⁴ See footnote 11 for definition of Plan Projects.

THRESHOLD T-2.2: For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?

To determine if there is an impact under the threshold above, you will need to address the following:

Question 1: Would the transportation project increase the project area¹⁵ VMT?

How to Determine: The project will have a potential impact if:

- The project will increase the project area¹⁶ VMT as measurable by the City's base year travel demand model plus an induced travel elasticity factor per lane mile.

Sources: See Section 2.3 in LADOT Transportation Assessment Guidelines.

THRESHOLD T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

To determine if there is an impact under the threshold above, you will need to address the following:

Question 1: Would the project substantially increase hazards due to a geometric design feature?

How to Determine: Preliminary project access plans are to be reviewed in light of commonly-accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant. The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.

¹⁵ The project area, for the purposes of a VMT analysis of transportation projects will be defined on a project by project basis. The area shall include the transportation analysis zones that contain a non-significant amount of vehicles traveling somewhere along their journey and also along the project corridor segment.

¹⁶ See footnote 15.

- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

Sources: See Section 2.4 in LADOT Transportation Assessment Guidelines.

THRESHOLD T-4: Would the project result in inadequate emergency access?

B. CUMULATIVE ANALYSIS

THRESHOLD T-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

To determine if there is a cumulative impact under the threshold above, depending on whether you have a project or a land use plan, you will need to address the following:

Development Project¹⁷ Question 1: Would the project in combination with the effect of related projects along the same block or street frontage cumulatively conflict with applicable programs, plans, ordinances or policies addressing the circulation system?

How to Determine: The project will have a potential cumulative impact if:

- The project is inconsistent with major policies applicable to the proposed project. Determine potential impact with respect to consistency with plans, ordinances, and policies based on overall consistency with each plan/ordinance/policy and considering the cumulative effect of nearby related projects.
- The determination of impact for this threshold is based on a nuanced consideration of overall plan, ordinance, and policy consistency. An impact determination would result if (1) the project directly conflicts with a standard established by a plan, policy or ordinance, and the finding(s) that govern relief cannot be made, and (2) that standard is adopted to protect the environment. In general, transportation standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that generally conforms with, and does not obstruct the City's development programs, ordinances, plans and policies will generally be considered to be consistent.

Sources: For guidance on addressing project specific questions, see Section 2.1 in LADOT Transportation Assessment Guidelines.

¹⁷ See footnote 10 for definition of Development Projects.

Plan Project¹⁸ Question 1: Would the plan in combination with the effect of other nearby plans cumulatively conflict with applicable program, plans, ordinances or policies addressing the circulation system?

How to Determine: The plan will have a potential cumulative impact if:

- The plan is inconsistent with applicable State, Regional, and Local policy documents, such as the SCAG RTP/SCS and the City of Los Angeles *Mobility Plan 2035*. Determine potential impact with respect to consistency with plans, ordinances, and policies based on overall consistency with each plan/policy and considering the cumulative effect of other plan or development projects.
- The determination of impact for this threshold is based on a nuanced consideration of overall plan, and policy consistency. An impact determination would result if (1) the project directly conflicts with a standard established by a plan, policy or ordinance, and the finding(s) that govern relief cannot be made, and (2) that standard is adopted to protect the environment. In general, transportation standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that generally conforms with, and does not obstruct the City's development programs, ordinances, plans and policies will generally be considered to be consistent.
- The plan may propose new goals and policies that could be seen to conflict with, or be inconsistent with the existing plan. However, upon plan adoption, the updated plan may now internally align with the proposed goals and policies. As such, the proposed plan will be evaluated as to the consistency with the plan and policies as revised under the relevant legislative and policy making procedures.

Sources: For guidance on addressing plan specific questions, see Section 2.1 in LADOT Transportation Assessment Guidelines.

THRESHOLD T-2.1: For a land use project¹⁹, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

To determine if there is a cumulative impact under the threshold above, depending on whether you have a project or a land use plan, you will need to address the following:

Development Project²⁰ Question 1: Is the project inconsistent with the RTP/SCS and, if so, does that inconsistency indicate a significant impact on transportation?

¹⁸ See footnote 11 for definition of Plan Projects.

¹⁹ See footnote 2 for definition of a land use projects.

²⁰ See footnote 10 for definition of Development Projects.

How to Determine: For projects development project that are subjected to an efficiency-based impact threshold such residential, office and/or mixed use projects that do not include regional serving retail uses, the project will have a potential impact if:

- The project analysis demonstrates both:
 - a project impact relative to the efficiency-based Threshold T-2.1 (i.e. VMT per capita or VMT per employee), and
 - that the project is inconsistent with the RTP/SCS in terms of development location, density, and intensity, or is located in an area where the RTP/SCS does not specify any development, and in either case the project results in an increase in household VMT per capita, or work VMT per employee (depending on project type) above that which was forecasted by the RTP/SCS for the project area in the RTP/SCS horizon year.

For regional serving retail projects²¹, entertainment projects, and/or event centers the project will have a potential impact if:

- The regional serving retail project, entertainment project, and/or event center would result in a cumulative impact if a cumulative "plus project" scenario were shown to lead to a net increase in daily VMT as compared to the cumulative "no project" scenario representing the adopted RTP/SCS horizon year conditions (as incorporated into the City's travel demand model).

Sources: See Section 2.2 in LADOT Transportation Assessment Guidelines.

Plan Project²² Question 1: Is the plan inconsistent with the RTP/SCS and, if so, does that inconsistency indicate a significant impact on transportation?

How to Determine: The plan will have a potential impact if either:

- The plan would result in average VMT per service population in the horizon year that exceeds 15% below the regional average VMT or that the plan is inconsistent with the goals of Senate Bill 743 to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.
- The land use growth anticipated under the plan is inconsistent with the SCAG RTP/SCS projected for the plan area, and that inconsistency

²¹ Regional serving retail projects are defined as retail projects that are above 50,000 square foot in total area

²² See footnote 11 for definition of Plan Projects.

indicates a significant impact on transportation. A significant impact will be indicated if based on quantitative or qualitative analysis it is shown that the plan is inconsistent with the goals of Senate Bill 743 to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses.

Sources: See Section 2.2 in LADOT Transportation Assessment Guidelines.

THRESHOLD T-2.2: For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?

To determine if there is a cumulative impact under the threshold above, you will need to address the following:

Question 1: Is the project inconsistent with the RTP/SCS and, if so, does that inconsistency indicate a significant impact on transportation?

How to Determine: The project will have a potential impact if:

- The transportation project is not included in the RTP/SCS and the project results in an increase in VMT.

Sources: See Section 2.3 in LADOT Transportation Assessment Guidelines.

THRESHOLD T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

To determine if there is a cumulative impact under the threshold above, you will need to address the following:

Question 1: Would the project in combination with other related projects substantially increase hazards due to a geometric design feature?

How to Determine: Review project site access plans for related projects with access points proposed along the same block(s) as the proposed project. Determine the combined impact and the project's contribution.

Sources: See Section 2.4 in LADOT Transportation Assessment Guidelines.

THRESHOLD T-4: The project would result in inadequate emergency access.

C. MITIGATION AND RESIDUAL IMPACTS

THRESHOLD T-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Identify mitigation measures that could reduce or eliminate any inconsistencies with applicable plans, ordinances, or policies. Determine level of significance after mitigation.

THRESHOLD T-2.1: For a land use project²³, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

Identify mitigation measures that could reduce the amount of vehicle miles traveled per capita or per employee (such as transportation demand management [TDM] measures or changes in land use mix). Determine level of significance after mitigation.

THRESHOLD T-2.2: For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?

Identify mitigation measures that could reduce the amount of increased vehicle travel induced by capacity increases (such as tolling new lanes to encourage carpools and fund transit improvements, converting existing general purpose lanes to high occupancy vehicle [HOV]/high occupancy toll [HOT] or bus lanes, implementing or funding TDM measures off-site, or implementing intelligent transportation systems [ITS] strategies to improve passenger throughput on existing lanes). Determine level of significance after mitigation.

THRESHOLD T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Identify mitigation measures that could reduce or eliminate hazards due to a geometric design feature. Determine level of significance after mitigation.

THRESHOLD T-4: The project would result in inadequate emergency access.

²³ See footnote 2 for definition of a land use projects.

IV. REFERENCE SECTION

A. DEFINITIONS

The “**Regional Transportation Plan**” (RTP), is a planning document prepared every four years by the Southern California Association of Governments (SCAG) for the six county region that includes Los Angeles, Orange, Riverside, San Bernardino, Ventura and Imperial counties. The RTP also contains a Sustainable Communities Strategy (SCS), that provides regional guidance with respect to land use in response to state laws (AB 32, SB 375) requiring reduction in greenhouse gas emissions. The RTP also provides the basis for conformance with the Clean Air Act with respect to mobile sources (the Air Quality Management Plan provides documentation with respect to stationary sources and other sources such as trains, planes and ships). The RTP includes growth projections for the next 20 years for each jurisdiction in the region. It is this growth projection that is the default projection used for most land use (and related) analyses in the region unless more specific data is available from the Los Angeles Department of City Planning (DCP).

The “**General Plan**” is a dynamic document consisting of several elements, including the Land Use Element. For the City of LA, the Land Use Element is comprised of 35 Community Plans plus plans for the Port of Los Angeles and Los Angeles World Airport (LAWA). California state law requires that every city and county prepare and adopt a long-term, comprehensive General Plan for its future development. The Land Use Element plan should be integrated and internally consistent with a compatible statement of goals, objectives, policies and programs that provide a decision-making basis for physical development. Government Code Sections 65860 requires that zoning ordinances be consistent with the General Plan.

A “**Community Plan**” is a planning document prepared for each of 35 areas (communities) within the City that (together with plans for the Port and LAWA) comprise the Land Use Element of the General Plan. The 35 community plans develop, maintain and implement the General Plan as appropriate for each community.

“**Mobility Plan 2035**” (MP2035) provides the policy foundation for achieving a transportation system that balances the needs of all road users. As the City’s General Plan Transportation Element, the MP2035 incorporates “complete streets” principles and lays the policy foundation for how future generations of Angelenos interact with their streets.

The “**Framework Element**”, or the General Plan Framework Element, is a strategy for long-term growth that sets a citywide context to guide the update of the community plans and citywide elements. The Framework Element responds to State and Federal mandates to plan for the future. The Framework Element does not mandate or encourage growth. The Framework Element establishes the broad overall policy and

direction for the entire General Plan. It provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the General Plan's other elements. The Framework Element also provides guidance for the preparation of related General Plan implementation measures including specific plans, ordinances, or programs, including the City's Capital Improvement Program.

An “**ordinance**” is a law set forth by a governmental authority; a municipal regulation.

B. SOURCES

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Federal Highway Administration, *Volume III – Guidelines for Applying Traffic Microsimulation Modeling Software*, August 2003.

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

Institute of Transportation Engineers, *Trip Generation Handbook, 3rd Edition*, 2014.

Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016.

Transportation Research Board, *2010 Highway Capacity Manual*, 2010.

Transportation Research Board, National Cooperative Highway Research Program (NCHRP) Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*.

C. DATA RESOURCES

NAVIGATE LA

Navigate LA is the Department of Public Works web tool. Navigate LA consolidates information from several City departments and provides a variety of information including haul route maps, Mobility Plan 2035 street designations, and whether a street is on the High Injury Network.

ZIMAS

The City maintains a GIS-based Zone Information and Map Access System (ZIMAS) database. ZIMAS provides several searching tools for locating properties of interest. Users can find specific sites by searching on address, Assessor Identification Number (AIN), or legal description. If this information is unknown, users can initiate a search for a general location by entering street intersections or may visually search for the property on the map display using the various tools that interact with the map. Information that can be obtained from ZIMAS:

- Parcel size
- Assessor Parcel No (APN)
- Community Plan Area
- Council District
- Building Permit Information
- Zoning
- General Plan Land Use
- Hillside Area
- Specific Plan
- Historic Places LA
- Community Design overlay
- Clean Up Green Up applicability