



Transportation Demand Management Program Update

Third Addendum to the Final Environmental Impact Report
City of Los Angeles Mobility Plan 2035 (SCH No. 2013041012)

Case Number: ENV-2013-0911-EIR-ADD3
Related Case Number: CPC-2021-3141-CA

Project Location: Citywide

Community Plan Area: All

Council District: All

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INTRODUCTION

1.1 Introduction/Purpose of Addendum

This document is the Third Addendum to the Environmental Impact Report (EIR) for the City of Los Angeles Mobility Plan 2035 (MP 2035) (Environmental Case No. ENV-2013-0911-EIR; SCH No. 2013041012). The EIR was prepared to evaluate the environmental effects that could result from full implementation of the Mobility Plan 2035, the Transportation Element of the City's General Plan, among other approvals, and was certified on August 11, 2015. The First Addendum (ENV-2013-0911-EIR-ADD1) analyzes minor revisions to MP 2035 and evaluates underlying assumptions demonstrating consistency with conclusions of the original EIR showing no increase in impacts. The Second Addendum (ENV-2013-0911-EIR-ADD2) analyzes a revised impact conclusion with respect to impacts on Emergency Services, including evaluation of Los Angeles Fire Department (LAFD) Strategic Plan (April 2015) and coordination with LAFD staff. Both the First and Second Addenda are incorporated into the Final Environmental Impact Report (EIR – SCH No. 2013041012, hereafter referred to as the Final EIR or FEIR).

The purpose of this Third Addendum is to evaluate the environmental effects associated with proposed updates to the Los Angeles Municipal Code (LAMC) Section 12.26 J (Transportation Demand Management and Trip Reduction Measures), updates to Los Angeles Department of Transportation (LADOT) transportation review fees, and updates to LADOT-administered trust funds that fund mobility improvements. The proposed ordinance updates represent a minor technical change to the Final EIR. This set of ordinance updates will hereafter be referred to as the "Project".

The MP 2035 comprehensive approach to mobility addresses the challenges of "environmental constraints, public health issues, regional inequity, and some of the longest traffic delays in the nation."¹ MP 2035 acknowledges that 67% of all commute trips in the City are made in single-occupancy vehicles (SOV). High rates of SOV travel contribute to roadway congestion, and lead to a host of other negative side effects. MP 2035 identifies the Project as Program PL.9 'Transportation Demand Management Ordinance revision,' an implementing action that considers the strong link between land use and transportation by requiring new developments to incorporate sustainable transportation options to reduce SOV trips, vehicle miles traveled (VMT), and vehicle trips. Ultimately, this effort can achieve more efficient use of the public right-of-way, reduce transportation related greenhouse gas (GHG) emissions, improve air quality, fight climate change, and improve sustainability, public health, and quality of life.

The primary component of the Project is an update to the City's Transportation Demand Management (TDM) Ordinance and associated supporting documents, collectively the TDM Program. The TDM Program is designed to require new developments of a certain size throughout the City to implement TDM strategies meant to reduce VMT and SOV generated by employees, residents, and visitors. The menu of TDM strategies available to new development projects, many of which are highlighted in the MP 2035, aim to shift trips from driving alone to more sustainable travel options to reduce SOV and VMT. The Project is part of the City's comprehensive approach to mobility, which comprises updating CEQA transportation impact analysis to VMT in compliance with Senate Bill 743, maintaining safe and efficient transportation networks, and delivering complete streets.

The purpose of this Addendum is to evaluate the Project and determine whether the Project has the potential to result in any new or substantially more adverse significant effects or require any new mitigation measures not identified in the MP 2035 Final EIR.

¹ Mobility Plan 2035, *Chapter 1: Introduction & Orientation*, page 13, accessed online at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

1.2 CEQA Requirements

According to Section 15164(a) of the State CEQA Guidelines, “the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” An addendum may be prepared if only minor technical changes or additions are necessary.

Section 15164(c) states that an addendum need not be circulated for public review. Section 15164(d) provides that the decision making body shall consider the addendum in conjunction with the certified EIR prior to making a decision on the project. Section 15164(e) requires documentation of the decision not to prepare a subsequent or supplemental EIR pursuant to Section 15162.

Section 15162 lists the conditions that would require the preparation of a subsequent EIR or negative declaration rather than an addendum. These include the following:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
 - A. *The projects will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - B. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - C. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - D. *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Per section 15162, a supplement to an EIR may be prepared per Section 15163 under the following conditions:

- a) *The lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:*
 - 1) *Any of the conditions described in Section 15162 would require preparation of a subsequent EIR, and*

- 2) *Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.*

A supplement to an EIR may be distinguished from a subsequent EIR by the following: a supplement augments a previously certified EIR to the extent necessary to address the conditions described in section 15162 and to examine mitigation and project alternatives accordingly. It is intended to revise the previous EIR through supplementation. A subsequent EIR, in contrast, is a complete EIR, which focuses on the conditions described in section 15162.

This Addendum has been prepared in accordance with relevant provisions of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the *State CEQA Guidelines*. The Project has been reviewed by the City of Los Angeles in light of Sections 15162, 15163 and 15164 of the CEQA Guidelines. As the CEQA Lead Agency, the City of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent EIR or supplement to the EIR, and that an addendum to the Final EIR is the appropriate environmental document under CEQA.

This Third Addendum evaluates underlying assumptions to the analysis of impacts that are identified in the Final EIR. The analysis demonstrates that the impact conclusions for this Third Addendum to the Final EIR are consistent with conclusions of the Final EIR and the Project will not result in new significant impacts or substantially increase the significance of impacts previously identified. As such, this Third Addendum is the appropriate and relevant environmental document under CEQA.

Section 3 presents a topical analysis of how the impacts of the Project would be within those previously identified in the Final EIR.

1.3 Mitigation Requirements

The Final EIR included mitigation measures to reduce environmental impacts associated with transportation projects and land use development, as appropriate, where the potential significant impacts could occur when developing individual projects. Based on the analysis contained in the Recirculated Draft EIR (RDEIR), the Final EIR identified mitigation measures because it was determined that the MP 2035 would create significant and unavoidable impacts related to transportation, parking and safety; noise and vibration; and biological resources. Based on the analysis contained in the RDEIR, the MP 2035 was found to have a less than significant or no impact on air quality; greenhouse gas emissions; and land use and planning.

The Project, as compared to the MP 2035 as evaluated in the Final EIR, would have less than significant impacts in all categories. The Project is consistent with the MP 2035 and is anticipated to be implemented in a manner consistent with that analyzed in the MP 2035 FEIR.

1.4 Summary Comparison of Significant Impacts Identified in Mobility Plan 2035 Final EIR compared to Impacts of the Project

As a part of its response to the 2012-2035 Regional Transportation Plan/Sustainable Communities (RTP/SCS), the City of Los Angeles initiated MP 2035. The MP 2035 provides a citywide transportation plan to provide the transportation framework on which to build balanced land use plans.

As a plan level document, the cumulative analysis is based on other plan-level documents, primarily

the RTP/SCS that includes growth projections and transportation improvements for the region. The environmental analyses included in the RDEIR, assumes that only reasonably foreseeable funded transportation projects will be present in the year 2035. Numerous other transportation improvements may occur between now and 2035 that would serve to reduce impacts. As referenced throughout the RDEIR, the analyses included are conservative and vehicle centric, and therefore likely overstate traffic and associated impacts. However, as land use plans are updated, they are generally oriented towards the reduction of vehicle trips and trip lengths by locating uses in proximity to each other and known transit. These land use planning efforts will directly complement the effects of MP 2035.

The potential for the MP 2035 to result in cumulatively considerable contribution to impacts is addressed below, as well as in the section discussing Effects Determined to be Less-Than-Significant. **Table 1** below provides a summary of impacts as identified in the RDEIR and analyzed in this Addendum. The analysis contained in the RDEIR of the Final EIR identified mitigation measures because it was determined that MP 2035 would create significant and unavoidable impacts related to transportation, parking and safety, noise and vibration, and biological resources. However, it was determined that the MP 2035 would only result in impacts associated with transportation, parking and safety, and noise and vibration.

The Project is consistent with the MP 2035 and State legislation and is anticipated to be implemented in a manner consistent with that analyzed in the MP 2035 FEIR. The Project was identified in the MP 2035 as an implementation action of the Plan and was analyzed in the Final EIR, and does not represent new impacts. In addition, the Project implements Mitigation Measure T2 of the MP 2035 Final EIR, which states the City shall implement appropriate TDM measures. The Project, as compared to the Final EIR, would have less than significant impacts in all categories. The Project proposes new requirements for developments to incorporate TDM strategies meant to reduce generated SOV trips and VMT. The qualified TDM strategies aim to shift trips from driving alone to more sustainable travel options. Many of the TDM strategies in the proposed TDM Program are also separate policies, or implementation actions identified in the MP 2035.

Holistically, the citywide TDM Program update will improve efficiencies in the city's transportation networks, which will decrease demand for driving and parking, reduce SOV and VMT, effectively reducing GHGs, and improve health, safety, and quality of life.

TABLE 1: SUMMARY OF IMPACTS MOBILITY PLAN 2035 FINAL EIR COMPARED TO IMPACTS OF THE PROJECT

Impact	Level of Significance 2015 MP 2035 FEIR	Level of Significance of the Project	Where impact was analyzed in prior environmental documents	Do Proposed changes involve new significant impacts or substantially more severe impacts?	Any new circumstances involving new significant impacts or substantially more severe impacts?	Any New Information Requiring New Analysis or Verification ?	Prior environmental documents' mitigations implemented or address impacts?
AIR QUALITY							
Conflict with or the potential to obstruct implementation of the applicable air quality plan?	Less-than-significant. Activity associated with MP 2035 would not generate unusual or atypical construction emissions compared to standard urban construction activities. Construction emissions would not exceed the SCAQMD significance thresholds. Additionally, in operation, the MP 2035 would reduce daily per capita VMT consistent with SCAQMD goals.	Less-than-significant. The Project would not change construction patterns evaluated by the FEIR. The Project is consistent with the City of Los Angeles General Plan Air Quality Element, the MP 2035, and RTP/SCS goals, including air quality plans. Further, the TDM strategies implemented through the TDM Program would work to reduce SOV trips and per capita VMT, demonstrating consistency with SCAQMD air quality goals.	Impact 4.3-1 Less than Significant	No	No	No	No mitigation measures are necessary
Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less-than-significant. Compliance with Rule 403 would reduce emissions associated with construction activity by 61%.	Less-than-significant. The Project is not anticipated to contribute substantially to an existing or projected air quality violation.	Impact 4.3-2 Less than Significant	No	No	No	No mitigation measures are necessary
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Less-than-significant. Construction emissions would not exceed SCAQMD thresholds. The MP 2035 would reduce VMT and decrease mobile source emissions within the City compared to Existing Conditions; thereby contributing to the goal of eliminating cumulative impact.	Less-than-significant. Any construction associated with the Project would be low intensity. In line with MP 2035, the Project would reduce VMT and mobile source emissions. Emissions are not anticipated to exceed the MP 2035 or SCAQMD localized thresholds.	Impact 4.3-3 Less than Significant	No	No	No	No mitigation measures are necessary
Expose sensitive receptors to substantial pollutant concentrations?	Less-than-significant. Emissions would be typical for urban environments within the region. Daily construction emissions would not exceed the SCAQMD significance thresholds of 10 in a million for the maximum incremental cancer risk or a 1.0 chronic or acute hazard index. Additionally, in operation, the MP 2035 would not significantly increase sensitive receptors' exposure to pollutants.	Less-than-significant. Any construction associated with the Project would be low intensity. In line with MP 2035, the Project would reduce VMT and mobile source emissions. Emissions are not anticipated to exceed the MP 2035 or SCAQMD localized thresholds.	Impact 4.3-4 Less than Significant	No	No	No	No mitigation measures are necessary

Create objectionable odors affecting a substantial number of people?	Less-than-significant. Odor sources within the SCAG region are controlled by country and city ordinances and air district rules that prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Mobile sources are not identified as a significant source of odors.	Less-than-significant. The Project is not associated with odor generation and is not anticipated to worsen impacts.	Impact 4.3-5 Less than Significant	No	No	No	No mitigation measures are necessary
BIOLOGICAL RESOURCES							
Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Significant. The MP 2035 would result in potentially significant impact during construction and a less than significant impact during operation. Mitigation measures have been identified that, in combination with project-specific mitigations, would likely reduce potentially significant impacts related to special status species to less-than-significant, however, the construction impact remains potentially significant.	Less-than-significant. Physical enhancements related to the Project would occur on sidewalks, the PROW, and potentially in the roadway. The nature of the improvements during construction or operation would not result in a substantial adverse effect on candidate, sensitive or special status species.	Impact 4.6-1 Significant	No	No	No	BR1
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	Significant. Where additional right-of-way would be outside the existing street right-of-way, mobility improvements on the enhanced network have the potential to result in effects to sensitive species and riparian habitats. Mitigation measures have been identified that, in combination with project-specific mitigations, would likely reduce potentially significant impacts related to special status species to less-than-significant, however, the construction impact remains potentially significant.	Less-than-significant. Physical enhancements related to the Project would occur on sidewalks, the PROW, and potentially in the roadway. The nature of the improvements during construction or operation would not result in substantial adverse effects on sensitive species and riparian habitats.	Impact 4.6-2 Significant	No	No	No	BR1
Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Significant. Where avoidance of the Ballona Wetlands is not feasible, then mitigation measures shall be implemented for the project-related loss of any existing wetlands on site, such that there is no net loss of wetland acreage or habitat value. Implementation of Mitigation Measure BR2 would ensure that for mobility improvements that extend into the Ballona wetlands, that the wetlands would be altered in the least disrupted way possible and replacement wetlands are incorporated to reduce potentially significant impacts, however due to	Less-than-significant. Physical enhancements related to the Project would occur on sidewalks, the PROW, and potentially in the roadway. The nature of the improvements would not result in substantial adverse effects on wetlands.	Impact 4.6-3 Significant	No	No	No	BR2

	unknown details of future projects the construction impact remains potentially significant.						
Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less-than-significant. Street trees within or immediately adjacent to the enhanced network right-of-ways could potentially support migratory birds. To prevent the disturbance of nesting native and/or migratory bird species, a mitigation measure is identified that would require that potential conflicts with the MBTA and CFGC are avoided as enhancements are implemented and impacts related to migratory birds, and potential impacts would be reduced to less-than-significant.	Less-than-significant. The Project would not substantially alter the existing transportation infrastructure from its current condition in such a way that could directly or indirectly affect migratory wildlife corridors. The Project would not create a condition that would increase the exposure of wildlife to corridor movement pathways. The Project aims to reduce SOV, VMT, and vehicle trips from new developments potentially improving conditions for migratory wildlife.	Impact 4.6-4 Less than Significant	No	No	No	BR3
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less-than-significant. Compliance with LAMC Ordinance No. 177,404, the City's Tree Preservation Ordinance, and all local policies or ordinances protecting biological resources would be ensured as specific enhancements are proposed and approved.	Less-than-significant. The Project would comply with LAMC Ordinance No. 177,404, the City's Tree Preservation Ordinance, and all local policies or ordinances protecting biological resources as specific enhancements are proposed and approved..	Impact 4.6-5 Less than Significant	No	No	No	No mitigation measures are necessary
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact. The proposed project would not be located in areas with a HCP or NCCP.	No Impact. The Project would not be located in areas with an HCP or NCCP.	Impact 4.6-6 No Impact	No	No	No	No mitigation measures are necessary
GREENHOUSE GAS EMISSIONS							
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less-than-significant. Implementation of MP 2035 together with anticipated emission controls, would (incrementally) decrease GHG emissions compared to Existing and Future no Build conditions, and would therefore have a less than significant impact on the environment.	Less-than-significant. The Project implements the MP 2035 and aims to reduce SOV trips, VMT, and vehicle trips from new developments, which would reduce GHG emissions aligned with the MP 2035.	Impact 4.4-1 Less than Significant	No	No	No	No mitigation measures are necessary
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less-than-significant. MP 2035 is consistent with the RTP/SCS, which is the primary regional plan designed to reduce GHG emissions. Implementation of the MP 2035 does not conflict with any other applicable plans, policies or regulations adopted for the purpose of reducing emission of GHG.	Less-than-significant. The Project is consistent with the RTP/SCS and is an implementation program of the MP 2035. The project does not conflict with any applicable plans, policies or regulations adopted for the purposes of reducing emissions of GHG.	Impact 4.4-2 Less than Significant	No	No	No	No mitigation measures are necessary

LAND USE AND PLANNING							
Physically divide an established community?	Less-than-significant. Implementation of the MP 2035 would not physically divide an established community and would therefore result in less-than-significant impacts.	No Impact. The Project would not divide a community. The Project would improve connectivity, accessibility, and walkability by encouraging and supporting a diversity of mobility options that would better connect people to neighborhood destinations, transit, and employment.	Impact 4.2-1 Less than Significant	No	No	No	No mitigation measures are necessary
Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less-than-significant. Implementation of the MP 2035 would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating environmental effect. Therefore, the MP 2035 would result in a less-than-significant impact.	Less-than-significant. The Project does not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. The Project is an implementation program of the MP 2035 and consistent with the RTP/SCS and other applicable land use plans, policies, and regulations.	Impact 4.2-2 Less than Significant	No	No	No	No mitigation measures are necessary
Conflict with any applicable habitat conservation plan or natural community conservation plan?	Less-than-significant. Improvements in accordance with the MP 2035 will not be located in areas with an HCP or NCCP.	No Impact. The Project would not be located in areas with an HCP or NCCP. Therefore, the project would not conflict with any applicable HCP or NCCP.	Impact 4.6-6 Less than Significant	No	No	No	No mitigation measures are necessary
NOISE & VIBRATION							
Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant. MP 2035 FEIR indicates that implementation of transportation projects and land use strategies in the MP 2035 would result in construction and operational noise levels that result in exposure of persons to or generation of noise levels in excess of standards established in local general plans or noise ordinances, or applicable standards of other agencies. Construction activity lasting more than a day shall incorporate mitigation measures including but not limited to: sound wall, sound blankets on impact equipment and engine mufflers to reduce noise levels to acceptable levels under 5 dBA, reducing impacts to less than significant. No feasible mitigation measures were identified to reduce the significant impact related to bus frequency to less than significant.	Less-than-significant. Physical enhancements related to the Project would be required to comply with the noise ordinance. Noise would not be of unusually extended duration at any given site and would be typical of construction in urban areas. Operational noise sources including buses would not create new or more significant noise than was identified in the MP 2035 FEIR.	Impact 4.5-1 Significant	No	No	No	N1
Exposure of persons to or generation of excessive ground	Less-than-significant with mitigation. Construction related to MP 2035 would result in significant impact	Less-than-significant. The Project would not result in exposure to excessive ground	Impact 4.5-2 Less than significant	No	No	No	N2

borne vibration or ground borne noise levels?	unless mitigated such that vibration impacts levels do not exceed 0.3 inches per second at 11 feet by using light weight equipment and by avoiding impact equipment. With mitigation, construction- related vibration impacts would be less than significant.	borne vibration or noise levels.					
A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Significant. Construction activity associated with MP 2035 is temporary in nature and does not relate to this criterion. No feasible mitigation measures were identified to reduce the significant impact related to bus frequency to less than significant.	Less-than-significant. Physical enhancements related to the Project would be required to comply with the noise ordinance. Operational noise sources including buses would not create new or more significant noise than was identified in the MP 2035 FEIR.	Impact 4.5-3 Significant	No	No	No	No mitigation measures are applicable.
A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less-than-significant with mitigation. The use of sound walls, sound blankets, engine mufflers etc. was identified as measures that would mitigate any impact associated with construction related to MP 2035 activities.	Less-than-significant. Physical enhancements related to the Project would be required to comply with the noise ordinance. Noise would not be of unusually extended duration at any given site and would be typical of construction in urban areas.	Impact 4.5-4 Less than Significant	No	No	No	N1
For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact. Major public airports have airport land use plans that provide guidance on noise levels and land use in adjacent areas, including noise source control and noise mitigation for certain land uses. Construction activity would not occur on airport property or directly adjacent to flight paths and operations would not expose people to excessive airport noise levels. The 2015 CBIA v. BAAQMD case indicates that impacts of the environment on projects should not be considered significant unless projects would exacerbate impact.	No Impact. Physical enhancements or improvements associated with the Project may occur on airport property or directly adjacent to flight paths but would not exacerbate those sources of noise.	Impact 4.5-5 No Impact	No	No	No	No mitigation measures are necessary
For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No Impact. Construction activity would not occur on airport property or directly adjacent to flight paths and operations would not expose people to excessive airport noise levels. The 2015 CBIA v. BAAQMD case indicates that impacts of the environment on projects should not be considered significant unless projects would exacerbate impact.	No Impact. Physical enhancements or improvements associated with the Project may occur on airport property or directly adjacent to flight paths but would not exacerbate those sources of noise.	Impact 4.5-6 No Impact	No	No	No	No mitigation measures are necessary
TRANSPORTATION, PARKING & SAFETY							
Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of	Significant. The MP 2035 would have a significant impact on the circulation system, as it would exceed the applicable thresholds established by the City. Mitigation measures have	Less-than-significant. The Project is not anticipated to increase traffic. The project offers a list of qualified TDM strategies that were selected for inclusion due to their demonstrated ability to reduce	Impact 4.1-2 Significant	No	No	No	T1 T2

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?	identified physical improvements to intersections that would reduce project impact such as the adjustment of signal timing and the implementation of TDM measures.	SOV trips, VMT, and vehicle trips from new developments. This would reduce the demand for vehicle trips while improving accessibility for residents, employees, and visitors.					
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?	Significant. The MP 2035 would have significant impact related to CMP freeway segments, as it increases volume to capacity ratio on some freeway segments by more than 2% under the LOS evaluation.	No impact. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted out, therefore, provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County including City of Los Angeles.	Impact 4.1-4 Significant	No	No	No	T4
Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less-than-significant. No overall increase in hazards anticipated.	Less-than-significant. No overall increase in hazards anticipated.	Impact 4.1-7 Less Than Significant	No	No	No	No mitigation measures are necessary
Result in inadequate emergency access?	Less-than-significant. After a review of the LAFD 2015 Strategic Plan and consultation with LAFD staff, the City found that there is not a significant impact to emergency access from the Updated Mobility Plan. As a mitigation measure, LADOT, LAFD, and DCP shall coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained.	Less-than-significant. Any lane closures would require approval by LADOT. Such approval would only be given contingent on standard construction techniques that avoid potential emergency access impacts.	Impact 4.1-5 Less than Significant per 2 nd Addendum	No	No	No	T5
Result in inadequate parking capacity?	Less-than-significant. Future with MP 2035 Project conditions reduce auto mode share with the largest increases in the share of other modes accruing to walking, transit and biking.	Less-than-significant. The Project is not anticipated to result in inadequate parking capacity. The project would implement TDM strategies that reduce SOV and VMT with strategies that offset vehicle trip and vehicular parking demand.	Less Than Significant	No	No	No	n/a
Conflict with adopted policies, plans, or programs	Less-than-significant. MP 2035 contains goals, objectives, and policies that	Less-than-significant. The Project is an implementation program of MP 2035, is	Impact 4.1-1 Less Than Significant	No	No	No	No mitigation measures are necessary

regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	support travel by all modes, including public transit, bicycling and walking.	consistent with the RTP/SCS, and other adopted policies, plans, and programs.					
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1.5 Incorporation by Reference

The following documents were used in the preparation of this Addendum, and are incorporated herein by reference, consistent with Section 15150, Incorporation by Reference, of the CEQA Guidelines:

City of Los Angeles Mobility Plan 2035 Draft Environmental Impact Report

City of Los Angeles Mobility Plan 2035 Recirculated Draft EIR (RDEIR)

City of Los Angeles Mobility Plan 2035 Final Environmental Impact Report

City of Los Angeles Mobility Plan 2035 Addition to Final Environmental Impact Report

City of Los Angeles Mobility Plan 2035 First Addendum to Final Environmental Impact Report

City of Los Angeles Mobility Plan 2035 Second Addendum to Final Environmental Impact Report

The Mobility Plan 2035 EIR Documents (Final, Draft, Recirculated, Addition to, and First and Second Addenda) are available for review at the City of Los Angeles, Department of City Planning and on-line:

Draft: <http://planning.lacity.org/eir/mobilityPlan/DEIR/index.html>

Recirculated: http://planning.lacity.org/eir/mobilityplan/deir/index_recirculated.html

Final: <http://planning.lacity.org/eir/mobilityplan/FEIR/feirmay12.pdf>

Addition to Final: <http://planning.lacity.org/eir/mobilityplan/FEIR/Addendum.pdf>

First Addendum:
https://clkrep.lacity.org/online/docs/2015/15-0719-S15_misc_12-21-2015.pdf

Second Addendum: https://clkrep.lacity.org/online/docs/2015/15-0719_MISC_5-10-16.pdf

1.6 Summary of Effects

The Project, as compared to the Final EIR, would have less than significant impacts in all categories. Section three of this Addendum includes a comprehensive evaluation of the environmental effects associated with the Project as compared to the impacts identified in the MP 2035 FEIR, for each

impact category of the CEQA environmental issue areas. As analyzed in the Final EIR, impacts of the Project would be less than significant as compared to those identified for the MP 2035. Project impacts would reduce GHG emissions as the Project is designed to encourage sustainable modes of transportation that improve air quality and promote public health.

DESCRIPTION

2.1 Mobility Plan 2035 and Mobility Plan 2035 Final EIR

The MP 2035 is a comprehensive revision of the adopted 1999 City of Los Angeles Transportation Element of the General Plan (GP) that guides mobility decisions in the City through year 2035, coupled with supporting documents and discretionary actions to further align the City's street standards, processes and procedures with the goals of the MP 2035. Sirius Environmental prepared a Draft EIR for the MP 2035, which the City circulated for a 90-day public review period, beginning on February 13, 2014 and ending on May 13, 2014. Following the close of the public comment period, a Final EIR was prepared that included the complete Draft EIR, and responses to all written comments. Subsequently, the MP 2035 EIR was recirculated to reflect an updated project description (plan) based on continued agency coordination and public comments received on the Draft MP 2035 and Draft EIR. The RDEIR together with the revised Draft MP 2035 were circulated for a 45-day comment public review period beginning, February 19, 2015 and ending April 6, 2015.

The MP 2035 was approved by City Council on August 11, 2015, along with certification of EIR No. ENV-2013-0911-EIR; SCH No. 2013041012 (Final EIR). The MP 2035 was fully readopted with policy amendments on January 20, 2016 (Updated MP 2035). The updated MP 2035 was approved relying on the Final EIR and Addendum No. ENV-2013-0911-EIR-ADD1. The Second Addendum (ENV-2013-0911-EIR-ADD2) analyzes a revised impact conclusion with respect to impacts on Emergency Services, including evaluation of Los Angeles Fire Department (LAFD) Strategic Plan (April 2015) and coordination with LAFD staff, both of those Addenda are incorporated to the Final Environmental Impact Report (EIR – SCH No. 2013041012, hereafter referred to as the Final EIR or FEIR).

The Final EIR is available for review online at www.lacity.org and at the Los Angeles City Hall, Van Nuys Civic Center, Central Library, Exposition Park Regional Library, San Pedro Regional Library, Arroyo Seco Regional Library, North Hollywood Regional Library, Mid-Valley Regional Library, West Valley Regional Branch Library, Goldwyn-Hollywood Regional Library, and the West Los Angeles Regional Library. The RDEIR and Final EIR can be downloaded or reviewed online at the Department of City Planning's website [<http://planning.lacity.org/> (click on "Environmental" and then "Final Environmental Impact Reports")]. The Final EIR can be purchased on CD-ROM for \$5.00 per copy.

The Project is Program PL.9 in the MP 2035: Transportation Demand Management Ordinance Revision (TDM). MP 2035 implementation programs represent the City's best thinking at the time on what actions should be taken to make sure that the Plan's aspirations are achieved. The precise programs the City may pursue, in which order, and when, is opportunity-driven, dependent on the availability of funding, staffing, and other necessary resources.

Program PL.9 calls for the City to: "Update the TDM ordinance (LA Municipal Code 12.26.J) to expand the number and type of projects required to incorporate TDM strategies and expand the number and variety of available TDM strategies. Include bicycle parking and other bicycle use incentives as a TDM measure to mitigate traffic/ vehicle trips for purposes of CEQA compliance for commercial, residential and mixed-use development projects. Continue to require eligible projects to provide work-trip reduction plans and parking cash-out programs in compliance with AQMD's Regulation XV."

The Project was crafted to be consistent with and advance the policies, objectives, and programs identified in the MP 2035 including:

- Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles (SOVs)
- Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita

- Objective: Decrease VMT per capita by 5% every five years, to 20% by 2035
- Objective: Meet a 9% per capita GHG reduction for 2020 and a 16% per capita reduction for 2035

The objectives of the Project were crafted to conform with various policies and objectives of the MP 2035:

Policy 1.2 Complete Streets. Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure safety and mobility of all users.

Policy 2.3 Pedestrian Infrastructure. Providing more attractive and wider sidewalks, and adding pedestrian signalization, street trees, and other design features encourages sustainable transportation options and a reduction in vehicle reliance and emissions, increasing economic vitality and vibrancy.

Policy 2.5 Transit Network. Transit-Enhanced streets outlined in the Plan strive to provide reliable and frequent transit service that is convenient and safe, increase transit mode share, and reduce single-occupancy vehicle trips.

Policy 2.6 Bicycle Networks. Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities

Policy 2.15 Allocation of Transportation Funds. Expand funding to improve the built environment for people who walk, bike, take transit, and for other vulnerable roadway users.

Policy 3.1 Access for All. Recognize all modes of travel, including pedestrian, bicycle, transit and vehicular, and goods movement modes as integral components of the City's transportation system.

Policy 3.3 Land Use Access and Mix. Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Policy 3.4 Transit Services. Provide all residents, employees, and visitors with affordable, efficient, convenient, and attractive transit services.

Policy 3.5 Multi-Modal Features. Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.

Policy 3.7 Regional Transit Connections. Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.

Policy 3.8 Bicycle Parking. Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

Policy 4.1 New Technologies. Support new technology systems and infrastructure to expand access to transportation choices.

Policy 4.2 Dynamic Transportation Information. Support a comprehensive, integrated transportation database and digital platform that manages existing assets and dynamically

updates users with new information.

Policy 4.7 Performance Evaluation. Evaluate performance of new transportation strategies through the collection and analysis of data.

Policy 4.8 Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.

Policy 4.9 Transportation Management Organizations. Partner with the private sector to foster the success of Transportation Management Organizations (TMOs) in the City's commercial districts.

Policy 4.11 Cohesive Regional Mobility. Communicate and partner with the Southern California Association of Governments (SCAG), Los Angeles County Metropolitan Transportation Authority (Metro), and adjacent cities and local transit operators to plan and operate a cohesive regional mobility system.

Policy 4.13 Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.

Policy 4.14 Wayfinding. Provide widespread, user friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.

Policy 5.1 Sustainable Transportation. Encourage the development of a sustainable transportation system that promotes environmental and public health.

Policy 5.2 Vehicle Miles Traveled. Support ways to reduce vehicle miles traveled (VMT) per capita.

Policy 5.4 Clean Fuels and Vehicles. Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

2.2 Project Background

The City of Los Angeles ("City") is home to just under 4 million residents, provides more than 1.7 million jobs, and in 2017, attracted more than 50 million domestic and international visitors.² These numbers are growing significantly: the City is estimated to gain an average of 35,000 new residents and 36,000 jobs per year.³ Yet, in 2017 approximately 68.9% of commute trips were made by SOV.⁴ SOV travel has contributed to severe delays due to traffic congestion, among other problems.

Recognizing this anticipated growth, the City aims to increase the proportion of trips made using sustainable travel options, such as riding public transit, carpooling, walking, riding a bicycle, and other options that create efficiencies and improve quality of life and user experience. Offering, raising awareness of, and providing incentives for a variety of mobility options can reduce the percentage of commuters, residents, and visitors who drive alone.

² Los Angeles Times. "[Los Angeles County hosts a record 50 million visitors in 2018](#)." January 16, 2019.

³ Population estimate from one-year ACS data for 2010-15; employment estimate from California Employment Development Department 2011-6.

⁴ Commuting Characteristics by Sex, 2013-2017 American Community Survey, 5-Year Estimates, Los Angeles City

In 1993, the City adopted its first Transportation Demand Management (TDM) Ordinance No. 168700, adding Subsection J to LAMC 12.26, to provide TDM features within new buildings that would decrease the rate of drive alone trips. The Project updates this and associated code sections to implement key programs identified in the Mobility Plan 2035.

The Project would amend the existing TDM Ordinance to apply to certain new development projects above the size threshold that are likely to generate an incremental increase in drive alone trips, expanding the number and type of projects that would be subject to TDM regulations. Requirements would be set at ascending levels based on project size and use activity, which is reflective of the project's transportation demand. A menu of options would be available for selecting strategies that meet unique needs for each property or neighborhood. Monitoring and evaluation would be core components of the program.

The Project also involves an update to LADOT's transportation-related development review fees to include fees for review of TDM Plans and other TDM documentation, and to establish a Mobility Investment Trust Fund (replacing two other existing mobility-related trust funds) for funds collected through optional TDM strategies. These updates are technical amendments to the City's code that will enable the City to implement the proposed TDM Ordinance.

Project Need

MP 2035 identifies the Project as Program PL.9 'Transportation Demand Management Ordinance revision,' an implementing strategy that considers the strong link between land use and transportation by requiring new developments to incorporate sustainable transportation options to reduce single occupancy vehicle trips (SOV), vehicle miles traveled (VMT), and vehicle trips. High rates of SOV travel and VMT create roadway inefficiencies, exacerbate air pollution, degrade roadway safety for all street users, and lead to a host of other negative side effects.

The MP 2035 notes that 47% of trips in the City are shorter than three miles, a length that could be easily traveled on foot or by bike, but 84% of such trips are currently made by car, providing opportunity to shift trips to sustainable modes. The MP 2035 points out that "even a relatively minor incremental shift in mode choice can yield large rewards" and also notes in Policy 5.2 that GHG emissions are closely correlated with VMT. Therefore reducing drive alone trips and VMT, coupled with efficient fuels and alternative vehicle technologies, is an important component of the overall strategy to reduce GHG emissions.

Alignment with State of California Policies

The Project complements or supports the following California state policy objectives:

- The South Coast Air Quality Management District (South Coast AQMD) Rule 2202 (adopted in 1995 with subsequent amendments) requires employers with worksites of 250 or more employees to manage single occupancy vehicle commute trip demand.
- California's Complete Streets Law, Assembly Bill 1358 (2008), declares it is state policy "to shift from short trips in the automobile to bicycling, walking and use of public transit."
- Similarly, the current strategic management plan of the California Department of Transportation calls for tripling bicycle mode share and doubling pedestrian and transit mode shares, compared with 2010-12 baselines, and for reducing statewide VMT.
- California Senate Bill 743 (2013), requires local jurisdictions to prioritize the safety and access of all street users by revising transportation impact assessment methodology for

CEQA analysis of land use projects, land use plans, and transportation projects. SB 743 directed the California Office of Planning and Research (OPR), the state's long-range planning and research agency, to prepare revisions to the CEQA Guidelines to establish criteria for determining the significance of transportation impacts that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses". The City of Los Angeles updated the way transportation impacts are measured pursuant to CEQA to align with the State legislation on July 30, 2019. The updated methodology and transportation impact thresholds measure impacts with VMT instead of level of service (LOS), which measures intersection congestion, better aligning transportation-related impacts with appropriate mitigation measures. The mitigation measures that have demonstrated effectiveness in reducing VMT are transportation demand management strategies. The Project would more holistically apply TDM strategies, closely aligning with the policy intent of SB 743.

2.3 Project Objectives

A multimodal transportation vision set forth in MP 2035 relies on reducing demand for SOV and VMT in Los Angeles. The Project is designed to provide new developments throughout the City with tools to reduce VMT and SOV generated by employees, residents, and visitors. The menu of TDM strategies available to employers and developers aim to shift trips from driving alone to more sustainable travel options. Many of the TDM strategies identified in the Project are also strategies of the MP 2035 goals and objectives.

Existing TDM regulations in Los Angeles already impose requirements on large employers. The Proposed TDM Ordinance would change the uses subject to the TDM Ordinance, adding residential uses, and modify the project size thresholds of new construction that would be subject to the TDM Ordinance. The Proposed TDM Ordinance is an evolution of, not a substantial departure from, the City's existing TDM Ordinance, bringing it in line with the goals, policies, and programs of the MP 2035. The Project seeks to improve holistic mobility options to allow the City to absorb new residents, jobs, and commercial activity, improve access to existing destinations and services, and overall quality of life. Ultimately, the Project aims to achieve more efficient use of the public right-of-way, reduce transportation related greenhouse gas emissions, and improve quality of life benefits.

2.4 Characteristics of the Project

The Project will update the following ordinances:

1. An ordinance amending Section 12.26 J of the Los Angeles Municipal Code (LAMC) to update the citywide Transportation Demand Management (TDM) Ordinance. This update to the existing 1993 TDM Ordinance proposes new requirements for developments that exceed certain size and use thresholds to incorporate strategies to reduce drive-alone automobile trips and expand access to alternative transportation options. Projects subject to the new regulations would be required to submit a TDM Plan to the Los Angeles Department of Transportation (LADOT) for review and approval before receiving a building permit. The proposed regulations would not apply to existing buildings, businesses, or residents. The amendment would establish program intent, describe applicability and exceptions, define requirements, and establish penalties for non-compliance. The amendment would also establish authority for LADOT to maintain and update, administratively, the

supporting TDM Program Guidelines document, which will provide details on the TDM Program strategies and processes.

2. An ordinance amending LAMC 19.15, Department of Transportation Traffic Study Review, Condition Clearance and Permit Issuance Fees (transportation related development review fees), to update LADOT development review fees to account for the different review procedures and responsibilities necessary on the part of LADOT staff in accordance with the proposed changes to the transportation impact study review process. The amendment would add fees for the review of TDM Plans, TDM Plan Compliance Documentation, and any necessary Monitoring Reports, and adjust the balance of the development review fees to reflect increased program costs (e.g. labor rates and technology procurement) and changes to work flows since the City adopted VMT as a review metric.
3. An ordinance amending Article 26 of Chapter 5 of Division 5 of the Los Angeles Administrative Code (LAAC) to administer a “Mobility Investment Trust Fund,” which would replace the existing “Bicycle Plan Trust Fund” and “Neighborhood Traffic Management Fund.” The Mobility Investment Trust Fund would be used to fund mobility investments through collection of voluntary contributions from projects that select either of the “Mobility Investment” TDM strategies in their TDM Plan that is reviewed and approved by LADOT. Mobility investments are defined as investments in sustainable transportation infrastructure and mobility services that are found to be consistent with the Mobility Plan 2035 and would support other ways of getting around besides driving alone.

The reasonably foreseeable outcomes of the Project would be the implementation of TDM strategies for development projects consisting of new construction or substantial additions above the specified size thresholds. The Proposed TDM Ordinance uses a point system to determine compliance, scaling TDM requirements to the size and transportation demand of development projects. A project’s Point Target is based on its use, size, and the amount of parking it provides. The TDM Ordinance would apply to both by-right and discretionary development projects.

Potential TDM strategies could include on-site amenities ranging from car share or bike share kiosks or memberships, transit subsidies, education and marketing material, transit information displays, wayfinding signage, childcare facilities, carpool parking, shared parking mechanisms, bicycle parking, changing or shower facilities, accessibility improvements, and more. Accessibility improvements will be defined project-by-project based on context and site access needs. Improvements could include new or improved sidewalks, crosswalks, curb extensions, median refuge islands, and more.

City staff may in the future add or remove additional strategies to the list of eligible options for selection and implementation to account for evolving technology or as a response to monitoring and evaluation data, if the strategy can demonstrate a relationship to the goals of the program. Additional strategies that can provide mobility options that meet the Project goals may be considered appropriate for piloting or adding into the menu of options. An applicant may propose a strategy (a “User-defined TDM Strategy”) that has not yet been identified by City staff for consideration. Approval of a User-defined TDM Strategy, if appropriate, would occur through a City Planning entitlement process and would therefore be evaluated pursuant to CEQA at that time.

The improvements resulting from the Project are envisioned to be implemented within the project site of a development project, on the sidewalk, in the curbside lane, or in travel lanes. The improvements would not contribute to significant impacts related to traffic/transportation, land use, air quality, greenhouse gases, noise and vibration, biological resources (as previously identified in

the Final EIR), or any other impact category.

It is reasonably expected that the Project would not result in major roadway reconfigurations. In instances where an improvement has the potential to affect the functionality of the street and roadway operations (e.g. curb extensions or travel lane changes), the improvement will be studied independently as part of a separate project environmental analysis.

2.5 Discretionary Actions and Approvals

The following actions by the City of Los Angeles will be required in order to implement the TDM Program (the Project):

- Adoption of this TDM Ordinance environmental document,
- Adoption of the Proposed TDM Ordinance to amend Section 12.26 J of the Zoning Code,
- Adoption of the LADOT Transportation Review Fee Ordinance, and
- Adoption of the Mobility Investment Trust Fund Ordinance.

ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

3.1 Overview

This Addendum provides an analysis of each environmental issue identified in the Final EIR to determine whether new or more severe environmental effects could occur from the implementation of the Project, and whether mitigation measures identified in the Final EIR would be needed and/or if additional mitigation could be necessary. These potential impacts are analyzed for the following environmental issues: transportation, parking and safety; land use and planning; air quality; greenhouse gas emissions; noise and vibration; and biological resources. Discussion is focused on the identification of changes that may be considered to be environmentally significant (a substantial, or potentially substantial adverse change in the environment) relative to the existing environmental conditions.

Based on the scope of the Project, there would not be any new impacts to other impact categories not previously analyzed in prior environmental documents for MP 2035. All impact categories other than the six that are analyzed in detail are listed below with a brief analysis.

The Environmental Checklist Form and accompanying evaluation of the responses provide the information and analysis upon which the Los Angeles City Council will make their determination that no new EIR is required for the proposed updates to the Project.

In the following evaluation each topic section includes the following sub-sections:

- Environmental Checklist. Contains a modified form of the Appendix G Initial Study Environmental Checklist. Each checklist question has been modified to address CEQA Guidelines Section 15162. The checklist has been modified to allow for yes or no answers to the following questions with respect to each issue outlined in Appendix G:
 - Would there be a new significant environmental effect caused by a change in the project or circumstances?
 - Would there be a substantial increase in the severity of a previously identified significant effect caused by a change in the project or circumstances?
 - Would there be a new or substantially more severe significant impacts shown by new information requiring new analysis or verification?
- The analysis presented for each Appendix G issue distinguishes that level of impact identified for the MP2035 FEIR and the level of impact anticipated for the Project.
- Any change in circumstances or new information relevant to each issue area is identified, as applicable.
- For each issue area, the analysis indicates that impacts would be similar to or less than those identified in the MP 2035 FEIR and therefore a Subsequent or Supplemental EIR is not required, and an Addendum is appropriate based on the analysis contained in this Addendum.
- Mitigation Measures Addressing Impacts
 - Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already

been implemented. A “yes” response will be provided in either instance. If “No” is indicated, this Environmental Review concludes that the impact does not occur with this Project and therefore no mitigations are needed.

- Discussion and Mitigation Sections

- Discussion. A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.
- Mitigation Measures. Applicable mitigation measures from the prior environmental review that apply to the Project are listed under each environmental category.
- Conclusions. A discussion of the conclusion relating to the analysis contained in each section.

3.2 Effects Determined to be Less Than Significant Based on EIR Categories

The Recirculated Draft EIR mentions less than significant or no impacts in the following categories and does not analyze them in detail. The TDM ordinance does not contain any substantial changes to any elements that would affect any of the following impact categories.

Aesthetics

Physical changes related to the Project would be in line with those evaluated in the MP 2035 EIR. Less than significant impacts would occur and the Project would not result in a cumulatively considerable contribution to aesthetic impacts.

Agriculture and Forestry Resources

Given that the Project would be implemented within and adjacent to the existing public rights-of-way, would not require substantial acquisition of properties, including those that support agricultural and forestry resources, and would not convert agricultural or forested lands, the Project would have no impact on agriculture and forestry resources, and the Project would not result in a cumulatively considerable contribution to agriculture and forestry impacts.

Cultural Resources

Given that the Project would have limited potential to impact cultural resources, and construction activities would be in line with those considered in the MP 2035 EIR, the Project is not anticipated to significantly impact cultural or paleontological resources and would not result in a cumulatively considerable contribution to impacts on cultural resources.

Geology and Soils

Given that the Project would have limited potential to impact geological resources, and design and construction activities would be in line with those considered in the MP 2035 EIR and would conform to applicable seismic codes, less-than-significant impacts related to geology and soils would occur and the Project would not result in a cumulatively considerable contribution to impacts on geology and soils.

Hazards and Hazardous Materials

Given that the Project would have limited potential to create a significant hazard; construction and operations related to the Project would comply with all applicable local, State, and federal laws and regulations and California OSHA standards; and would not expose additional people or structures to wildland fires, less-than-significant impacts related to hazards and hazardous materials would occur and the Project would not result in a cumulatively considerable contribution to impacts related to hazards and hazardous materials.

Hydrology and Water Quality

Given that the Project would have limited potential to impact hydrology and water quality or expose people or structures to water-related hazards, and construction activities would be in line with those considered in the MP 2035 EIR, the Project would result in less-than-significant impacts to hydrology and water quality and the Project would not result in a cumulatively considerable contribution to impacts on hydrology and water quality.

Mineral Resources

Given that the Project would have limited potential to impact mineral resources, no impact would occur and the Project would not result in a cumulatively considerable contribution to impacts to mineral resources.

Population and Housing

Given that the Project would have limited potential to induce substantial population growth, displace substantial existing housing or displace substantial people, the Project would have no impact on population and housing and would not result in a cumulatively considerable contribution to impacts.

Public Services

Because the Project would not induce growth or the construction of new buildings, it would not result in an increase in demand for fire and police services, schools, or other public facilities. In addition, the Project would not result in the substantially increased use of existing parks and other recreational facilities. Therefore, less than significant impacts to public services would occur and the Project would not result in a cumulatively considerable contribution to impacts on public services.

Recreation

Given that the Project would have no impact on population and housing and limited impacts to recreational facilities (as a result of improved access), the Project would have less-than-significant impacts on recreation and would not result in a cumulatively considerable contribution to impacts on recreational facilities.

Utilities and Service Systems

Construction and operational activities resulting from the Project would not connect to the public sewer or water systems or generate substantial solid waste, thus the Project would result in less-than-significant impacts on utilities and service systems. Given that the Project would have no impact on population and housing and limited impacts to utilities, the Project would not result in a cumulatively considerable contribution to impacts to utilities.

Mandatory Findings of Significance

The Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. In addition, the Project would not have impacts that are individually limited, but cumulatively considerable or that would cause substantial adverse effects on human beings either directly or indirectly.

3.3 Air Quality

Air quality impacts were previously analyzed in Section 4.3 of the Final EIR. For thresholds (a), (b), (c), (d) and (e), the FEIR determined that implementation of the MP2035 would result in less than significant impacts.

Based on the below detailed discussion, no new significant impacts or a substantial increase in previously identified impacts to air quality would occur as a result of the Project. Therefore, the impacts to air quality do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166(c) or CEQA Guideline, Section 15162.

- (a) **Does the Project require Subsequent or Supplemental CEQA documentation with respect to the potential to conflict with or the potential to obstruct implementation of the applicable air quality plan?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.3-1 Less than Significant	

Construction

The Project is designed to provide tools that encourage, promote, and support sustainable travel to and from project sites by implementing TDM strategies with demonstrated effectiveness in reducing SOV, VMT, vehicle trips, greenhouse gas emissions, and other factors. TDM strategies can be physical or programmatic including but not limited to the following: transit subsidies, car share, bike share, implementing a child care on site, bike parking, wayfinding signage etc. The available menu of TDM strategies is anticipated to grow over time as technology advances and as data collected from monitoring the TDM Program allows evaluation of the efficacy of each strategy in reducing SOV and VMT.

Implementing the TDM strategies would not generate unusual or atypical construction emissions compared to standard urban construction activity; rather these emissions would be at the low end of the range of construction activities that occur in urban areas. Further, construction emissions would not exceed the South Coast AQMD significance thresholds. Therefore the Project would result in less-than-significant impact related to construction emissions.

Operation

Consistency with the South Coast AQMD Air Quality Management Plan (AQMP) can be assessed by determining how a project accommodates increases in population or employment, and if the project is consistent with the goals of the RTP/SCS. Generally, a project that is planned in a way that minimizes drive alone trips and VMT both within the project area and the surrounding community would also minimize air pollutant emissions.

The Project is expected to result in increased mobility options, more walkable communities, and fewer barriers to sustainable travel. The Project plays an important role for those who would choose not to drive if they had an alternative as well as for those who do not have the option of driving. The Project encourages switching from drive alone trips to drive modes with higher efficiency, like carpool/vanpool, and non-driving modes of travel, such as transit and active transportation.

The Project is also consistent with the objectives and policies of the Air Quality Element of the General Plan in that it seeks to promote better air quality outcomes through the implementation of multimodal transportation strategies that reduce SOV trips.

The project supports the following General Plan Air Quality Element policies:

- 2.1.1 Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as on employer and encourage the private sector to do the same to reduce work trips and traffic congestion.
- 2.2.1 Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.
- 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.
- 4.2.5 Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

The per capita reduction in VMT demonstrates consistency with the AQMP goals. The Project would be consistent with the RTP/SCS.

The MP 2035 FEIR identifies impacts with respect to air quality plans to be less than significant with no mitigation measures required. The Project implements the MP 2035, reduces VMT, and is consistent with the AQMP and RTP/SCS. Therefore, the proposed Project would also result in a less than significant impact with respect to air quality plans.

(b) Does the Project require Subsequent or Supplemental CEQA documentation with respect to the potential to violate any air quality standard or contribute substantially to existing or projected air quality violation?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.3-2 Less than Significant	

Construction

Air quality impacts were previously analyzed in Section 4.3 of the MP 2035 FEIR. For thresholds (a), (b), (c), (d) and (e), the FEIR determined that implementation of the MP2035 would result in less than significant impacts. No new significant impacts or a substantial increase in previously identified impacts to air quality would occur as a result of the proposed updates to the Project. The Project, as compared to the MP 2035 FEIR, would have less than significant impacts in all categories.

The TDM strategies outlined in the Project are anticipated to be implemented in a manner consistent with that analyzed in the MP 2035 FEIR. Achieving the goals of the Project will result in improved air quality and public health outcomes, more affordable travel options, reduction of transportation-related collision risks, and consistency with the MP 2035 and State legislation.

The physical improvements resulting from the Project are envisioned to be implemented within the project site, on the sidewalk, in the curbside lane, or in travel lanes. The improvements would not contribute to significant impacts related to traffic/transportation, land use, air quality, greenhouse gases, noise and vibration, biological resources (as previously identified in the FEIR), or any other impact category.

It is not reasonably expected that the Project would result in major roadway reconfigurations. In instances where an improvement has the potential to affect the functionality of the street and roadway operations (e.g. curb extensions or travel lane changes), the improvement will be studied independently as part of a separate project environmental analysis. Therefore, the impacts to air quality do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166(c) or CEQA Guideline, Section 15162.

Operation

The MP 2035 FEIR analyzed impacts with MP 2035 and without MP 2035. The Future with MP 2035 scenario was not found to generate any significant impacts as compared to the Future no MP 2035 scenario, as analyzed in MP 2035 FEIR Section 4.3-2.

In the MP 2035 EIR, the model-estimated changes in the circulation system conditions are conservative, vehicle-centric estimates based on historical travel behavior patterns and do not fully account for changes in demographics, vehicle ownership patterns, energy prices, and migration to alternate modes that would lead to decreasing vehicular volumes. The MP 2035 enhanced networks would decrease regional VMT compared to the future No MP 2035 scenario and associated air emissions. In support of the MP 2035, the Project will decrease VMT by requiring new development to implement SOV travel demand reduction measures that minimize the reliance on auto activity in the vicinity of the development.

MP 2035 project improvements to transit, walk, and bicycle modes shift some travelers from vehicles to those modes (based on historical trends), reducing VMT under Future with MP 2035 conditions relative to Future No MP 2035 conditions. Future with MP 2035 conditions, and pollutant emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems combined with normal turnover in the vehicle fleets, new emissions standards and the proposed TDM program strategies with the intent to equip property owners, property managers, and employers with tools to reduce VMT by shifting from drive alone trips in personal vehicles to more sustainable travel options.

Future with MP 2035 emissions would be less than Existing emissions (echoing reductions in VMT), and would not exceed the SCAQMD significance thresholds. Further, as an implementation of the MP 2035, the Project builds on and effectuates the policies of MP 2035 by providing strategies that are proven to reduce VMT and SOV.

The Project includes a broad spectrum of strategies designed to promote and support a full range of

mobility options, from information, support, and incentive programs to investments in connected, complete streets. The Project will incorporate emerging transportation technologies, capture shifting travel preferences, and accommodate future mobility needs through diverse, adaptive TDM applications. For the Project, no new impacts would occur, impacts would be less-than-significant, and no mitigations are required.

- (c) **Does the Project require Subsequent or Supplemental CEQA documentation with respect to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative threshold for ozone precursors)?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.3-3 Less than Significant	

Construction

Because the Basin is designated as a State and/or federal nonattainment air basin for O₃, PM_{2.5}, PM₁₀ and Pb, there is an ongoing regional cumulative impact associated with these pollutants. An individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. A significant impact would occur if the project resulted in cumulative net increase in any criteria pollutant above thresholds identified by the SCAQMD. The SCAQMD's approach for assessing cumulative air quality impacts is based on the SCAQMD forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. The SCAQMD has set forth significance thresholds designed to assist in the attainment of ambient air quality standards. The SCAQMD has indicated that the project-level thresholds may be used as an indicator defining if project emissions contribute to the cumulative impact. As discussed above, construction emissions would not exceed the SCAQMD significance thresholds. Therefore, the Project would result in less-than-significant impact related to cumulatively considerable construction impact.

Operation

As previously discussed, the Project would decrease mobile source emissions within the City compared to Existing conditions. Traffic volumes are expected to be lower as a result of the multi-modal sustainable transportation options required to be implemented by applicable projects; in addition to the expectation of lowered pollutant emissions from mobile sources due to technological advances in vehicle emissions systems combined with normal turnover in the vehicle fleet and new emission standards. There is no potential for project-related emissions to contribute to the Basin's cumulative impact for O₃, PM_{2.5}, PM₁₀ or Pb. Further, it is anticipated that the Project will reduce VMT and associated mobile source emissions, thereby contributing towards the regional goal of eliminating the cumulative impact. Therefore, the Project would result in a less-than-significant impact related to a cumulatively considerable operational impact. For the Project, no new impacts would occur and no mitigation measures are required.

(d) **Does the Project require Subsequent or Supplemental CEQA documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.3-4 Less than Significant	

Construction

The MP 2035 EIR evaluated localized impacts from on-site daily emissions associated with construction activities for sensitive receptors located adjacent to construction activity based on LST guidance published by the SCAQMD.⁵ LSTs are only applicable to NO_{x2}, CO, PM₁₀ and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. On-site emissions typically include equipment exhaust and fugitive dust emissions. Daily construction emissions related to the MP 2035 would not exceed SCAQMD localized significance thresholds (NO_x -74 pounds per day, CO – 426 pounds per day, PM_{2.5} – 3 pounds per day, PM₁₀- 4 pounds per day).

The greatest potential for toxic air contaminant (TAC) emissions during construction would be diesel particulate emissions associated with heavy-duty equipment operations. However, in general, measures that may be selected for implementation in conformance with the Project would not likely produce construction activity. In such cases, where construction activity would occur, it is anticipated that said activities in the immediate vicinity of any individual sensitive receptor would be relatively brief (on the order of a few days). Additionally, any construction associated with the Project would be low intensity (e.g. would not require heavy-duty equipment). Emissions would be typical for urban environments within the region and are in line with construction evaluated in the MP 2035 Final EIR. The Project would not introduce new impacts and would result in a less-than-significant impact related to construction TAC emissions. No mitigation required.

Operation

The Project is designed to provide new developments throughout the City with tools to reduce VMT and SOV generated by employees, residents, and visitors. The Project would apply TDM requirements, project responsibilities, and TDM strategies uniformly whether a project is located in a high VMT area or a high-density area near transit. The Project is intended to reduce VMT, thereby reducing air emissions and greenhouse gases and promoting the expansion of a multimodal transportation system. The Project, in line with the MP 2035 and impacts evaluated in the Final EIR, would have less than significant impacts in all categories.

⁵ SCAQMD, *Final Localized Significance Threshold Methodology*, Revised July 2008.

Roadway Widening / Reduced Capacity

Existing ambient CO levels are extremely low within the Basin. CO concentrations in the basin have not exceeded State standards since 1992 due to stringent State and federal mandates for lowering vehicle emissions. This is accurate even when considering the most congested City intersections with the highest traffic volumes and largest percentage of vehicle idle time. No CO standard has been exceeded in the Basin since 2002. The Basin is designated as a maintenance area for CO which means both State and federal air quality standards are satisfied.

To trigger an impact, CO emissions along any roadway segment affected by the Project, would have to increase by almost 7 times in the peak hour or by four times in over an 8-hour period. Because of the low ambient CO condition, even where speed on average segments could be reduced to almost zero, the resulting CO emissions would only increase by a factor of two. It is not reasonably expected that the Project would result in major roadway reconfigurations. Under the most extreme circumstances, the change in emissions levels would not be high enough to cause an exceedance of the CO air quality standard, and therefore would not result in a significant impact.

Diesel Emissions

The greatest exposure concern to TACs is associated with diesel emissions. The majority of buses operating within the City of Los Angeles are powered by alternative fuels. For example, the entire bus fleet operated by the Los Angeles County Metropolitan Transportation Authority, and several other bus operators, are powered by compressed natural gas. It is not anticipated that increased bus service, even as supported by the Project, would substantially increase diesel particulate emissions. It is not anticipated that the Project would result in any lane conversions that would change diesel-emitting truck travel patterns substantially and therefore the Project would not significantly increase associated exposure to emissions.

Lane Conversions

Peak-hour traffic speeds on the roadway network would change where lanes would be converted to transit or bicycle lanes, which could affect truck emissions on those roadways. However, it is not anticipated that the Project would change truck speeds to the extent that associated emissions would result in substantial additional exposures of sensitive receptors. Therefore, the Project would result in less than significant impact related to operational TACs.

Bicycle Riders

The Project supports additional bicycle infrastructure, including bike parking, bike share stations, bicycle lanes, and changing and shower facilities, as options in the TDM strategy menu. Bicycle riders using new bicycle lanes in high-volume roadways would be exposed to higher pollutant concentrations than riders that use neighborhood routes. However, it is anticipated that bicycle lanes would allow riders to quickly traverse congested areas. In addition, as described above, the peak hour pollutant concentrations would be less than State Standards and exposure would not exceed applicable standards.

(e) **Does the Project require Subsequent or Supplemental CEQA documentation with respect to creating objectionable odors affecting a substantial number of people?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓

New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.3-5 Less than Significant	

Construction

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. Construction odors would be typical of urban construction sites and temporary in nature, and construction related to the Project would be in line with that evaluated in the MP 2035 Final EIR. Therefore, the odor impact during construction would be less than significant.

Operation

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies and fiberglass molding. The Project does not include any of these land uses or industrial operations. The SCAQMD does not identify mobile sources or residential uses as a significant source of odors. Therefore the Project would not result in a significant impact related to odors. No mitigation is required.

3.4 Biological Resources

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following?

- (a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife Services (USFWS)?
- (b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?
- (c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	(a) BR1 (b) BR1 (c) BR2	
Where Impact was Analyzed in Prior Environmental Documents	(a) Impact 4.6-1 Significant (b) Impact 4.6-2 Significant (c) Impact 4.6-3 Significant	

Impacts to biological resources are analyzed in Section 4.6 of the FEIR. For thresholds (a), (b), and (c), the MP 2035 FEIR determined the construction impacts would be significant. The MP 2035 FEIR includes mitigation measures to reduce impacts, but impacts to special status species and habitat, and wetland habitat remain potentially significant even with mitigation.

Construction

The Mobility Plan 2035 FEIR identified that construction activities associated with implementation of enhancements occurring within 200 feet of a sensitive ecological area (SEA) or on open space or underdeveloped areas that contain native vegetation could have a substantial adverse effect on special-status species through the generation of noise or pollutants (both air and water), and/or the disruption of habitat. Where additional right-of-way would be outside the existing street right-of-way, mobility improvements on the enhanced network have the potential to result in effects to sensitive species and riparian habitats. Specifically, the mobility improvements could result in the modification of protected habitats or other areas containing habitat capable of supporting special-status species.

The Project would not substantially alter the existing transportation infrastructure from its current condition and TDM measures and/or those improvements that require physical implementation would occur within the existing public right of way (PROW) and not result in substantial construction activity of high intensity or duration. Potential physical measures can include bicycle parking, changing or shower facilities, car share or bike share kiosks, transit information displays, wayfinding signage, access improvements, and more. Access improvements will be defined project-by-project based on context and site access needs. Improvements could include new or improved sidewalks, crosswalks, curb extensions, median refuge islands, and more. If determined to be necessary as a part of a construction plan, any improvements would have to comply with the mitigation measures

BR1, BR2, and BR3. As such, the Project would not contribute any additional impacts to biological resources than those previously identified in the FEIR.

Operation

During operation, mobility improvements along the enhanced networks would not result in direct physical effects to candidate, sensitive, or special status species as enhancements would occur on roadways, sidewalks, and the PROW. The nature of the Project would not substantially alter the existing transportation infrastructure from its current conditions in such a way that could indirectly affect candidate, sensitive, or special status species. Therefore less-than-significant impacts related to candidate, sensitive, or special status would occur during the Project. The nature of the improvements would not substantially alter the function of transportation infrastructure in such a way that would affect wetlands. Therefore, no significant impacts related to wetlands would occur.

There are no substantial changes to the circumstances under which the MP 2035 would be undertaken, and there is no new information of substantial importance that has come available relative to biological resource impacts or resources that have occurred since the certification of the MP 2035 FEIR. Additionally, no new significant impacts to biological resources have been identified that would require subsequent or supplemental CEQA documentation.

➤ MP 2035 Mitigation Measures

BR1 Special-Status Species and Habitat. For future enhancements occurring within 200 feet of a Significant Ecological Area designated by the County of Los Angeles or within 200 feet of areas containing native vegetation, such as open space and undeveloped areas, a project-specific biological resource survey and assessment shall be conducted and prepared that discloses any potential impacts to special status species and habitats, and mitigates, to the extent feasible, the impacts of the mobility improvements. In addition, prior to implementation of mobility improvements, all required permits must be obtained; permits for work in wetland and riparian habitats frequently require project-specific measures to preserve resources.

BR2 Wetland Habitat. For mobility improvements that extend into the Ballona wetlands, all applicable wetland permits shall be acquired. These permits include, but would not be limited to, a Section 404 Wetlands Fill Permit from the US Army Corps of Engineers, or a Report of Waste Discharge from the Regional Water Quality Control Board (RWQCB), and Section 401 Water Quality Certification from the RWQCB. Additionally, a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) would be required for development that would cross or affect any stream course.

Where feasible, the maximum amount of existing wetlands shall be preserved and minimum 25- to 50-foot buffers around all sides of these features shall be established. In addition, the final project design shall not cause significant changes to the pre-project hydrology, water quality, or water quantity in the wetland that is to be retained. This shall be accomplished by avoiding or repairing any disturbance to the hydrologic conditions supporting these wetlands, as verified through wetland protection plans.

Where avoidance of the Ballona Wetlands is not feasible, then mitigation measures shall be implemented for the project-related loss of any existing wetlands on site, such that there is no net loss of wetland acreage or habitat value. Wetland mitigation shall be developed as a part of the Section 404 Clean Water Act permitting process, or for non-jurisdictional wetlands, during permitting through the RWQCB, CDFW, and/or USFWS. Mitigation is to be provided prior to construction related impacts on the existing wetlands. The exact mitigation ratio is variable, based on the type and

value of the wetlands affected by the project, but agency standards typically require a minimum of 1:1 for preservation and 1:1 for construction of new wetlands. In addition, a Wetland Mitigation and Monitoring Plan shall be developed that includes the following:

- Descriptions of the wetland types, and their expected functions and values.
- Performance standards and monitoring protocol to ensure the success of the mitigation wetlands over a period of five to ten years.
- Engineering plans showing the location, size and configuration of wetlands to be created or restored.
- An implementation schedule showing that construction of mitigation areas shall commence prior to or concurrently with the initiation of construction.
- A description of legal protection measures for the preserved wetlands (i.e., dedication of fee title, conservation easement, and/ or an endowment held by an approved conservation organization, government agency or mitigation bank).

➤ Significance of Impact after Mitigation

- Implementation of Mitigation Measure BR1 would ensure that supplemental project specific analysis would be completed for mobility improvements that occur outside existing right-of-way and are adjacent to habitats containing candidate, sensitive, special status species, riparian habitat or other sensitive natural community. It is anticipated that project-specific mitigation measures would be identified that would reduce potentially significant impacts related to special-status species and riparian habitat or other sensitive community to less-than-significant, however, due to the unknown nature of future projects and mitigation measures, the MP 2035 FEIR found a potentially significant impact remains. The TDM Project would not change conditions or introduce additional impacts related to biological resources.
- Implementation of Mitigation Measure BR2 would ensure that for mobility improvements that extend into the Ballona wetlands, that the wetlands would be altered in the least disrupted way possible and replacement wetlands are incorporated to reduce potentially significant impacts related to wetlands to less-than-significant. However, due to the unknown nature of future projects and mitigation measures, the MP 2035 FEIR found a potentially significant impact remains. The TDM Project would not change conditions or introduce additional impacts related to biological resources.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

- (d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓

Prior Environmental Documents Mitigations Implemented or Address Impacts	BR3	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.6-4 Less than Significant	

Construction

In general, existing roadways, sidewalks, and PROW do not serve as wildlife corridor movement pathways, or linkages of note between larger habitat areas for terrestrial wildlife. While wildlife does sporadically find their way into transportation infrastructure, the potential improvements to be implemented in accordance with the Project would not create a condition that would increase exposure to corridors of movement pathways. The Project would not substantially alter the existing transportation infrastructure from its current condition and TDM measures and/or those improvements that require physical implementation would occur within the existing PROW and not result in substantial construction activity of high intensity or duration. Construction, if determined to be necessary as part of a construction plan, would have to abide by mitigation measures BR1, BR2, and BR3. In view of that, the Project would not result in any significant impacts in addition to those identified in the MP 2035 FEIR, and Project construction impacts related to native or migratory birds, fish, and wildlife would be less-than-significant.

Operation

The nature of the improvements would not substantially alter the existing transportation infrastructure from its current condition in such a way that could indirectly affect migratory wildlife corridors. Therefore, no significant impacts related to migratory wildlife corridors would occur. No mitigation measures are required.

➤ MP 2035 Mitigation Measures

BR3 Migratory Birds. To prevent the disturbance of nesting native and/or migratory bird species, the City shall require that clearing of street trees or other vegetation should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), the City of Los Angeles shall require that a qualified biologist conduct a nesting bird survey within 250 feet of the construction activity, no less than 14 days and no more than 30 days prior to the commencement of construction activities. Surveys shall be conducted in accordance with CDFW protocols, as applicable. If no active nests are identified on or within 250 feet of the construction activity, no further mitigation is necessary. A copy of the preconstruction survey shall be submitted to the Department of City Planning. If an active nest is identified, construction shall be suspended within 100 feet of the nest until the nesting cycle is complete, as determined by a qualified ornithologist or biologist.

➤ Significance of Impact after Mitigation

Implementation of Mitigation Measure BR3 would require that potential conflicts with the MBTA and CFGC are avoided as enhancements are implemented and impacts related to migratory birds would be reduced to less-than-significant.

- (e) **Does the Project require Subsequent or Supplemental CEQA documentation with respect to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinances?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.6-5 Less than Significant	

Construction and Operation

The removal or disturbance of any trees would be subject to the Los Angeles Municipal Code Ordinance No. 177,404, the City's Tree Preservation Ordinance which requires a permit for the removal or relocation of protected trees. This ordinance also requires the replacement of protected trees. The Department of Urban Forestry also has a goal to resolve conflicts between street trees and infrastructure, so as to preserve the net benefit conferred by that segment of the urban forest on the remaining City infrastructure. Existing trees would be preserved where possible and/or relocated to the extent possible.

To comply with the Urban Forestry Program, trees greater than four inches diameter at breast height requiring removal will be examined by a registered arborist for suitability of relocation or replacement and incorporated into the re-landscaping plan. Compliance with all local policies or ordinances protecting biological resources would be ensured as specific enhancements are proposed and approved. Therefore, a less-than-significant impact would occur related to conflict with local policies or ordinances protecting biological resources. Therefore, the Project would not have the potential to significantly impact policies or ordinances protecting biological resources, such as tree preservation policy and or ordinances. A less-than-significant impact would occur and no mitigation is required.

- (f) **Does the Project require Subsequent or Supplemental CEQA documentation with respect to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.6-6 No Impact	

Construction and Operation

The proposed Project improvements would not be located in areas with an HCP or NCCP. Therefore, the construction and operation of the project would not conflict with an HCP or NCCP. The Project would result in no impact, and no mitigation is required.

3.5 Greenhouse Gas Emissions

The Mobility Plan 2035 FEIR found less than significant impacts with respect to changes in GHG emissions compared to existing and future no build conditions.

The Project is designed to produce shifts to sustainable modes of transportation that improve air quality, promote public health, and provide community benefits. Shifting travel to sustainable modes of transportation has many benefits, including reducing VMT, public and private costs (including opportunity costs), negative environmental and aesthetic effects, and other negative environmental and public health outcomes. Based on empirical evidence presented in the Office of Planning and Research (OPR) January 2016 guidelines, the updated final guidelines released in November 2017, and an independent literature review by City staff, the City concluded that establishing VMT as the basis for transportation impact significance criteria for projects will reduce air emissions and greenhouse gases, promote the expansion of a multimodal transportation system, and mitigate other environmental problems relative to a LOS vehicle delay-based transportation impact criteria. The Project will help to decrease VMT by requiring new developments to implement single occupancy vehicle travel demand reduction measures that minimize the reliance on auto activity in the vicinity of new development. The Project does not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166(c) or CEQA Guidelines, Section 15162.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

- (a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.4-1 Less than Significant	

Construction & Operation

At the time the MP 2035 FEIR was released there were no specifically planned construction projects and there are no projects currently specifically planned for construction as a part of the Project. Therefore enhancements to the transportation networks are identified at a conceptual level of detail.

The reasonably foreseeable projects occurring from the Project could result in the implementation of programmatic and physical measures that an applicant could select from a menu of TDM strategies. Potential programmatic measures could include on-site amenities ranging from car share or bike share membership, transit subsidies, education and marketing material, and more. Potential physical measures can include bicycle parking, changing or shower facilities, car share or bike share kiosks, and more. Access improvements will be defined project-by-project based on context and site access needs. Improvements could include new or improved sidewalks, crosswalks, curb extensions, median refuge islands, and more.

No specific enhancements have been proposed in this planning analysis, and an annualized quantification of construction emissions would be entirely speculative. Additionally, construction

related GHG emissions would be a negligible percentage of total regional emissions when considering the emissions generated by mobile sources. For example, the 2012-2035 RTP/SCS construction emissions presented for 2035 conditions in Los Angeles County were approximately 0.3 percent of mobile source emissions. These emissions included construction emissions from all development activity (e.g. electricity, natural gas, and solid wastes decomposition), not just transportation improvements. GHG emissions strictly from transportation projects would represent less than 0.3 percent of total emissions. Therefore, the Project would result in a less-than-significant impact related to construction GHG emissions and operation of the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.4-2 Less than Significant	

Construction & Operation

At the time the MP 2035 FEIR was released there were no specifically planned construction projects and there are no projects currently specifically planned for construction as a part of the Project. Therefore enhancements to the transportation networks are identified at a conceptual level of detail.

The Project implements the MP 2035 and is aligned with the MP 2035 goals and policies, furthering reduction of VMT, SOV, and associated vehicle emissions. MP 2035 is the City of Los Angeles Transportation Element.

Implementation of the MP 2035 and the Project would occur citywide and would affect all 35 City of Los Angeles Community Plan areas (community plans). These community plans include several objectives that are applicable to the Project. In general, these objectives can be summarized as follows:

- Increase capacity on existing transportation systems through minor physical or programmatic improvements;
- Promote pedestrian & bicycle use and the reduction of auto dependence;
- Maintain a safe and efficient street network; and
- Promote the use of transit.

The Project is consistent with community plan goals and objectives related to the promotion of pedestrian, transit and bicycle use and would improve the overall multimodal transportation system.

The Project is also consistent with the LA's Green New Deal (Sustainable City pLAn, 2019) which aims to achieve the following targets through updating the city's TDM Ordinance (the Project), transportation infrastructure and safety improvements, and information campaigns, among other strategies:

- Reduce Vehicle Miles Traveled (VMT) per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.
- Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045.
- Increase the percentage of all trips made by walking, biking, micro-mobility / matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050.

The Project is also consistent with the RTP/SCS and policies and goals related to increasing capacity on existing transportation systems and with maintaining a safe and efficient street network. Therefore, the Project would result in a less-than-significant impact related to consistency with existing GHG reduction plans, and no mitigation is required.

3.6 Land Use and Planning

(a) Does the Project require Subsequent or Supplemental CEQA documentation with respect to the potential to physically divide an existing community?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	LU1	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.2-1 Less than Significant	

According to the City of Los Angeles CEQA Guidelines, the Project may be considered incompatible with surrounding land uses if it has the potential to disrupt the physical arrangement of an established community by introducing new infrastructure or isolating land uses that could interrupt the typical activities or change the land use conditions in a community. However, transportation infrastructure is compatible with most urban land uses because it allows accessibility and improved operational efficiency of those uses. Specifically, proposed pedestrian, bicycle, vehicle and transit enhancements implemented as a result of the Project would improve mobility and create a more pedestrian friendly atmosphere.

The Project supports the link between land use and transportation by facilitating management of the City's streets by making sure new developments are designed to encourage and support a diversity of mobility options that would complement the activity generated by land uses. The Project may improve connectivity by encouraging and supporting a diversity of mobility options that would better connect communities.

The Project is consistent with objectives and policies of the General Plan Framework and MP 2035 in that it seeks to create a safer and more pleasant pedestrian or multi-modal experience. The Project further strengthens the MP 2035 as a plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable for the rural, suburban, or urban context of the General Plan.

Construction

Currently, there is no specifically planned construction that is part of this Project, as the updates will apply to new developments. Therefore the Project is identified at a conceptual level of detail. As indicated in the RDEIR, construction related land use impacts of the MP 2035 generally would not be considered significant due to their temporary and limited duration.

As described in the MP 2035 FEIR, construction activities associated with implementation of the enhanced networks could result in temporary access disruptions to adjacent uses. Impacts and disruptions to access during construction would be temporary. It is not reasonably expected that the Project would result in major roadway reconfigurations. In instances where an improvement has the potential to affect the functionality of the street and roadway operations (e.g. curb extensions or

travel lane changes), the improvement will be studied independently as part of a separate project environmental analysis. The improvements resulting from the Project are envisioned to be implemented within the project site, on the sidewalk, in the curbside lane, or in travel lanes. The improvements would not contribute to significant impacts related to traffic/transportation, land use, air quality, greenhouse gases, noise and vibration, biological resources (as previously identified in the FEIR), or any other impact category. Any potential impacts would occur within or adjacent to existing transportation rights-of-way and would not isolate communities, or alter the existing land use conditions in the community. There are no substantial changes relative to the certified MP 2035 FEIR. Therefore, as described in the MP 2035 FEIR, construction impacts from the Project would not divide a community or affect land use compatibility and impacts would be less than significant. The Project would not foreseeably create new or more severe impacts related to dividing a community or affecting land use compatibility from construction than those impacts identified in the MP 2035 FEIR. No mitigation measures are required.

Operation

Operation of the Project would not result in the conversion of existing land use to a new use. The potential mobility improvements related to the Project would be compatible with surrounding commercial, office, residential, and institutional uses and would improve safety, access, and alternative modes of transportation in the surrounding area. Therefore, impacts to land use would be less than significant and would not result in new or more severe impacts associated with roadway widening than those identified in the FEIR.

The measures that may be implemented in accordance with the Project further support the MP 2035 and Complete Streets Initiatives, in addition to the smart investment in world class infrastructure and a balanced multimodal approach that is needed to accomplish the goals, policies and objectives of both. Improvements will be defined project by project based on context and site access needs. The Project will enhance efficiency of the transportation system, create more pedestrian friendly atmospheres and reduce the City's transportation carbon footprint as described below.

Empirical research suggests that pedestrian and bicycle accessibility investments, specifically those that improve connectivity and street-user comfort, have powerful vehicle-trip reduction outcomes over time due to a multiplier effect. The California Air Pollution Control Officers Association (CAPCOA) reports that improving the connectivity of pedestrian facilities may increase the proportion of all trips completed by walking by about two percent.⁶ Projects located near an existing bicycle facility or providing a bicycle facility near a project site can reduce SOV travel and reduce VMT.

The possible Project-related improvements would provide enhanced accessibility for non-vehicular modes of transportation, which would increase accessibility to residents that live in close proximity to local goods and services. The effects of these facilities are especially impactful when multiple bicycle facilities or services are implemented together.

Based on the nature of the transportation improvements that may be implemented as TDM strategies as a result of the Project, it is not anticipated that substantial changes to a roadway or any changes to neighborhood character would occur. It is not anticipated that the Project would directly or indirectly lead to changes in zoning.

Research demonstrates strong benefits when projects provide first- and last-mile access to high-quality transit. Additionally, research on real-time transit information, education and marketing, and wayfinding signage suggest moderate reductions of auto use by providing project site users the

⁶ CAPCOA (2010), "Quantifying Greenhouse Gas Mitigation Measures," page 47.

information needed to make the best transportation choices based on the trip. Therefore, the Project further supports improvements to the MP 2035's Transit Enhanced Network by availing a menu of strategic measures that can be selected to be employed at specific project sites to reduce GHG emissions, would be compatible with adjacent land uses and would not disrupt existing uses in surrounding areas. Therefore, less-than-significant impacts related to the division of a community and land use compatibility would occur.

➤ MP 2035 Mitigation Measures

While the indirect land use effects to on-street parking loss would not be significant, the following mitigation measure would provide relief to potentially impacted businesses that could be affected by on-street parking loss.

LU1. Prior to the decision to remove on-street parking, the City of Los Angeles shall meet with the affected business and property owners to discuss the potential for the removal of on-street parking to affect the economic viability of the affected businesses. The City shall identify parking replacement options to businesses that do not have off-street parking and would be substantially affected by the permanent removal of on-street parking.

➤ Significance of Impact after Mitigation

Implementation of Mitigation Measure LU1 would ensure that the City is aware of the specific businesses that could be potentially affected by the loss of on-street parking. The disclosure of potential affected businesses would enable the decision-makers to weigh the benefits of the proposed mobility improvements with the potential indirect effect to businesses. Impacts related to the division of a community and land use compatibility would remain less-than-significant.

(b) Does the Project require Subsequent or Supplemental CEQA documentation with respect to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating environmental effect?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	T1 T2 T3 T4	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.2-2; Less than Significant	

According to the City of Los Angeles CEQA Guidelines, the Project would be inconsistent with land use plans if it conflicts with an adopted land use/density designation, or is inconsistent with the General Plan or adopted environmental goals or policies contained in applicable plans. Applicable

land use goals, policies and development standards were evaluated with respect to the proposed goals, policies and mobility improvements of the MP 2035 and the Project to determine consistency and any potential inconsistencies. The consistency analysis was prepared in compliance with the CEQA Guideline Section 15125(d), Environmental Setting. The purpose of the required analysis is to identify potential inconsistencies between the Project and applicable general and regional plans. Neither CEQA nor the State CEQA Guidelines set forth standards for determining when a project is inconsistent with an applicable plan, but the final determination that a project is consistent or inconsistent with an applicable plan is made by the Lead Agency when it acts on a project. Using the methodology described below, the analysis presents the findings of the policy review and is intended to provide a guide to the decision-makers for policy interpretation.

A project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts (per State CEQA Guideline Section 15382, Significant Effect on the Environment). Therefore, a single policy conflict is not considered to be a significant environmental impact. An inconsistency between a proposed project and one policy of applicable plans does not necessarily indicate a physical environmental impact. In some cases, an inconsistency may be evidence that an underlying physical impact is significant and adverse. Conversely, plan consistency may indicate that a potential environmental impact is less than significant.⁷

Construction

While no construction is proposed as a part of the MP 2035 nor for the Project, implementation of both plans may lead to construction of identified changes to mobility features in the City. Construction methods and equipment would be typical for infrastructure projects, and would not conflict with adopted plans and policies because of their temporary and limited duration.

The reasonably foreseeable projects occurring from the Project could result in the implementation of physical measures that an applicant could select from a menu of TDM strategies. Potential physical measures can include bicycle parking, changing or shower facilities, car share or bike share kiosks, transit information displays, wayfinding signage, accessibility improvements, and more. Access improvements will be defined project-by-project based on context and site access needs. Improvements could include new or improved sidewalks, crosswalks, curb extensions, median refuge islands, and more.

The improvements resulting from the project are envisioned to be implemented within the project site, on the sidewalk, in the curbside lane, or in travel lanes. The improvements would not contribute to significant impacts related to traffic/transportation, land use, air quality, greenhouse gases, noise and vibration, biological resources (as previously identified in the FEIR), or any other impact category.

Operation

Regional and State Plans and Policies.

Applicable regional and state plans and policies include the RTP/SCS, and the Complete Streets Act. The Project would be consistent with the goals of the Complete Streets Act by accommodating the needs of bicyclists and pedestrians. Additionally, as an implementation of the MP 2035, the Project would be consistent with applicable goals of the RTP/SCS as evaluated in the MP 2035 FEIR. Specifically, the Project would encourage non-motorized transportation, including bicycling

⁷ This methodology is based on the following resource and was used in the MP 2035 RDEIR analysis: Kostka and Zischeke. *Practice Under the California Environmental Quality Act*. Continuing Education of the Bar: Oakland, CA, 2008.

and walking. This would protect the environment and health of residents by improving air quality and encouraging active transportation. This would also be consistent with the RTP/SCS goal of encouraging land use and growth patterns that facilitate transit and non-motorized transportation.

City of Los Angeles Plans and Policies.

City of Los Angeles General Plan Framework Element. The City of Los Angeles General Plan Framework Element establishes the overall policy and direction for the General Plan. It includes a long-range strategy to guide the comprehensive update for the General Plan's other elements. MP 2035 is a plan to improve the long-term mobility of the transportation infrastructure. Implementation of the Project would facilitate movement within a mature urban area as growth continues. The Project in and of itself does not induce growth. It accommodates anticipated infill or density-related growth as envisioned in the Framework and manages transportation demand and promotes sustainable transportation modes by incorporating TDM strategies into new development.

The MP 2035 EIR evaluated MP 2035 for conflicts with the General Plan Framework Element. The Project, as an implementation program of the MP 2035, does not introduce new or substantially different policy direction that has not already been evaluated.

The MP 2035 and the Project are neither a stimulant nor a constraint to forecast growth. The Department of City Planning has determined, at its discretion, that the best means to monitor and manage growth is at the project approval and permitting phase, with such processes as site plan review, water supply assessments, exaction of fees for infrastructure connections/public services, and imposition of conditions of approval. It is this level that provides the best certainty for a balanced outcome between land use decisions and infrastructure. The Project updates TDM requirements for individual development projects and will be imposed via a ministerial process overseen by LADOT. However, the Project does not otherwise change the City's permitting or entitlement processes.

MP 2035 is a plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the General Plan. The Project supports that with TDM strategies for development projects. Therefore, the Project is consistent with the General Plan Framework Element.

City of Los Angeles Transportation Element. The MP 2035 replaced the City of Los Angeles Transportation Element of the General Plan, which provided the following goals:

- Adequate accessibility to work opportunities and essential services, and acceptable levels of mobility for all those who live, work, travel, or move goods in Los Angeles.
- A Street system maintained in a good to excellent condition adequate to facilitate the movement of those reliant on the system.
- An integrated system of pedestrian priority street segments, bikeways, and scenic highways.

The MP 2035 was prepared in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads and highways. As a replacement of the Transportation Element, MP 2035 built upon the concepts included in that document, and the Project implements some of them.

The Project is consistent with policies and goals related to providing accessibility, facilitating

movement, and integrating a multimodal network. The goals and objectives that are identified for the Project are consistent with the previous goals and objectives of the Transportation Element as they offer additional benchmarks for providing a safe and efficient transportation system for all people and all modes of travel. Therefore, the Project would be consistent with the City of Los Angeles Transportation Element.

Designated Scenic Routes and Truck Routes. The MP 2035 addresses all modes of circulation on the City's street network, guiding mobility policies, programs, and projects in the City of Los Angeles through 2035. Designated scenic routes included in the 1999 City of Los Angeles Transportation Element did not change under the MP 2035 and would not change under the Project.

City of Los Angeles Community Plans. Implementation of the MP 2035 and the Project would occur within the 35 City of Los Angeles Community Plan areas (Community Plans). These Community Plans include several goals and objectives that are applicable to the Project. These goals and objectives can be summarized as follows:

- A diverse system of streets that balances the needs of pedestrians, bicyclists, transit users, equestrians, mobility challenged persons, and vehicles while providing sufficient mobility and abundant access options for the existing and future users of the street system.
- A system of safe, efficient, and attractive pedestrian, bicycle, and trail routes linking neighborhoods to key areas in the community, including commercial centers, services and employment, points of historical interest, as well as open space and recreational areas.
- A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.
- Develop a public transit system that improves mobility with convenient alternatives to automobile travel.
- A well maintained, safe, and efficient street network.
- To increase the work trips and non-work trips made on public transit.
- To promote an adequate system of safe bikeways for commuter, school and recreational use.

The MP 2035 and the Project would be consistent with community plan goals and objectives related to the promotion of pedestrian, transit, and bicycle use. The development of a citywide Enhanced Complete Street system included in the MP 2035 and further supported by the Project outline modal enhancements for particular major streets in mode-specific enhanced networks. In addition to network improvements, the MP 2035 and the Project also consider proposed and programmed projects such as pedestrian access enhancements and installations of mobility hubs at Metro Rail stations and project sites, complete street enhancements, parking management strategies, education and marketing, and transit, bicycle and pedestrian related projects throughout the City on both public and private property.

The increased access to other modes of transportation and improved connectivity related to bicycle, transit and pedestrian networks would result in increasing percentages of bicycling, walking and transit use as travel modes, allow for a reduction in parking demand and support a host of strategies to lead to a reduction in congestion and GHG emissions over the long term. The Project balances demand for off street parking with other transportation and land use objectives that result in fewer vehicle trips. The Project provides greater proximity and access to neighborhood services and

provides greater access to alternative modes of transportation (other than cars) for residents, students, employees, and visitors.

In summary, the operational impacts of the Project would not conflict with regional plans and policies, and would result in a less-than-significant impact to land use. Land use impacts would continue to be less than significant and the Project would not foreseeably result in new or more significant land use impacts from those identified in the FEIR.

➤ MP 2035 Mitigation Measures

See Mitigation Measures **T1** through **T4** in Section 3.6 of this Addendum, Transportation, Parking and Safety (or in Impact 4.2-2 of the MP 2035 FEIR).

➤ Significance of Impact after Mitigation

Mitigation measures **T1** through **T4** would address the goals and policies regarding circulation and parking, identified above that were determined to have partial consistency. Consistency with applicable plans would remain a less-than-significant impact.

(c) **Does the TDM Ordinance require Subsequent or Supplemental CEQA documentation with respect to conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.6-6 Less than Significant	

As indicated in **3.2, Biological Resources**, development in accordance with updates to the Project would not occur within a Habitat Conservation Plan (HCP), or Natural Community Conservation Plan (NCCP), or other approved habitat conservation planning area. Development would generally be located in urbanized areas and therefore, the Project would result in no impact with respect to HCPs and NCCPs. No mitigation is required.

3.7 Noise & Vibration

Noise and vibration impacts are analyzed in Section 4.5 of the MP 2035 FEIR. For thresholds (e) and (f), the MP 2035 FEIR determined that implementation of the MP 2035 would result in no impacts. For thresholds (b) and (d), the MP 2035 FEIR determined that implementation of the MP 2035 would, with mitigation measures, result in less-than-significant impacts. For thresholds (a) and (c), the FEIR determined the impacts would be significant. The MP 2035 FEIR identified significant impacts related to noise exposure and/or noise levels in excess of local standards. MP 2035 FEIR indicated that implementation of transportation projects and land use strategies in the MP 2035 would result in construction and operational noise levels that result in exposure of persons to or generation of noise levels in excess of standards established in local general plans or noise ordinances, or applicable standards of other agencies.

The MP 2035 FEIR includes mitigation measures, but some impacts still remain significant. The Project would not result in any new significant noise and vibration impacts. There is no new information of substantial importance that has become available relative to noise and vibration. No substantial changes in the environment related to noise and vibration have occurred since certification of the MP 2035 FEIR, and no substantial new significant noise and vibration impacts have been identified that would result in new or more severe significant environmental impacts.

Does the TDM Ordinance require Subsequent or Supplemental CEQA documentation with respect to the following:

- (a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	N1	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.5-1 Significant	

Construction

The MP 2035 is an element of the General Plan that guides mobility policies, programs, and projects in the City of Los Angeles. The Project further advances the City's vision for mobility as set forth in the MP 2035 and the State of California's transportation, air quality, and climate action policy objectives. The Project does not include planned improvements, as it applies to new development projects, including but not limited to office employment, housing and/or retail (including restaurant and hotel space) that are above the size threshold that are likely to generate an incremental increase in VMT and SOV use.

Construction activity would result in temporary increases in ambient noise levels on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and reception, and presence or absence of noise attenuation barriers. Typical noise levels are listed in **Table 3** for noise levels at distances of 50, 100, and 400 feet from the construction noise source.

TABLE 3 : MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES

Noise Source	Noise Level (dBA)		
	50 Feet ^a	100 Feet ^a	400 Feet ^a
Front Loaders	80	74	62
Trucks	89	83	71
Jackhammers	90	84	72
Concrete Mixers	82	76	64
Pavers	87	81	69

a. Assumes a 6-dBA drop-off rate for noise generated by a “point source” and traveling over hard surfaces. Actual measured noise levels of the equipment listed in this table were taken at distances of 10 and 30 feet from the noise source.

SOURCE: City of Los Angeles, *City of Los Angeles CEQA Thresholds Guide*, 2006.

Construction activity associated with the MP 2035's Enhanced Networks would mainly include reconfiguration of roadway striping and would not include excavation or construction. Limited heavy-duty equipment is anticipated to construct the proposed enhancements (e.g., small loaders for sidewalk widening or asphalt paving equipment). The Project would not induce or incentivize construction of development projects, however TDM strategies related to the Project would be incorporated into future development projects. Construction activity, methods, and equipment associated with the Project would be typical for development projects and infrastructure projects and would not be substantially more than that identified in the MP 2035 FEIR.

The improvements resulting from the Project are envisioned to be implemented within the project site, on the sidewalk, in the curbside lane, or in travel lanes. The improvements would not contribute to significant impacts related to traffic/transportation, land use, air quality, greenhouse gases, noise and vibration, biological resources (as previously identified in the FEIR), or any other impact category.

The reasonably foreseeable projects occurring from the Project could result in the implementation of programmatic and physical measures that an applicant could select from a menu of options. Potential programmatic measures could include on-site amenities ranging from car share or bike share membership, transit subsidies, education and marketing material, childcare facilities, carpool parking, shared parking mechanisms, and more. Potential physical measures can include bicycle parking, changing or shower facilities, car share or bike share kiosks, transit information displays, wayfinding signage, access improvements, and more. Access improvements will be defined project-by-project based on context and site access needs. Improvements could include new or improved sidewalks, crosswalks, curb extensions, median refuge islands, and more. An applicant may also propose a strategy not identified by City staff for consideration.

The potential mobility improvements related to the Project would be located within the City of Los Angeles and unrelated construction activities could occur concurrently with the project area. Concurrent construction activities from nearby related projects could generate noise and vibration at each site and cumulative construction noise and vibration may exceed ambient noise and vibration levels at the nearest sensitive land uses between the Project and related project sites. However, construction related noise and vibration levels from the related projects would be intermittent, temporary and would comply with the time restrictions and other relevant provisions in the Los Angeles Municipal Code. Therefore, the Project would not contribute to a cumulatively considerable impact related to construction noise and vibrations.

It is not reasonably expected that the project would result in major roadway reconfigurations. Due to the nature of the strategies, many of which are programmatic and would not require any construction, and those that are physical strategies would not involve any substantial construction.

Many of the treatments would have minimal, or no, construction noise. In instances where an improvement has the potential to affect the functionality of the street and roadway operations (e.g. curb extensions or travel lane changes), the improvement will be studied independently as part of a separate project environmental analysis.

The types of construction that may result from the Project are either typical to construction of development projects, such as installation of bike racks as required by the Zoning Code, or were evaluated in the MP 2035 FEIR. All construction would comply with Section 41.40 of the LAMC, which regulates the hours of construction activities. Mitigation Measure N1, identified in the MP 2035 RDEIR reduces MP 2035 construction noise impacts to less-than-significant. Employing the same mitigation measure, the Project would also have a less-than-significant impact related to construction noise.

Operation

The cumulative analysis for the MP 2035 was based on the transportation model, which incorporates regional socioeconomic forecasts and community growth and land use projections. The Project would not involve changes to truck routes, the regional rail and light rail system, or port or airport activity. Therefore no increase in noise would occur related to these activities.

The MP 2035 and the Project is a mix of policies and conceptual level mobility improvements to the transportation network. Detailed designs for improvements are not yet available as they will be project based, and the Project allows individual development projects to select TDM strategies from a menu. However, the TDM strategies allowed and encouraged by the Project would not introduce noise impacts other than those that were evaluated in the MP 2035 FEIR.

The MP 2035 FEIR area-level bus analysis concluded that the Transit Enhanced Network (TEN) would result in a significant impact related to increased bus noise. Optional TDM strategies that may be selected in accordance with the Project include: Transit Access-Improve Transit Service, which allows projects to select the option to provide funding to a local transit provider for improvements that increase service and/or reduce headways for transit lines within ¼ mile radius of the project site; and and Transit Access-Neighborhood Shuttles/Microtransit Service, which allows projects to select the option to operate a neighborhood-serving shuttle service. The MP 2035 FEIR determined that increases in bus frequency would be implemented by the Los Angeles County Metropolitan Transportation Authority (Metro) and other transit providers and project-level assessments will be completed by the appropriate transit agency as necessary. TEN-related bus noise, in combination with other local sources of noise (including operation of nearby light rail where bus and light rail routes intersect), could increase cumulative noise in areas where existing ambient levels already exceed City standards. Depending on specific roadway designs, a bus only lane could increase noise levels by more than 3 dBA at sensitive land uses. Therefore, the Project could contribute to a cumulatively considerable impact related to operational noise on the TEN, but would not be significantly more than that identified in the MP 2035 FEIR. Noise impacts associated with other enhancements would continue to be less than significant.

Based on the aforementioned, the Project would not foreseeably result in new or more significant noise and or vibration impacts from those identified in the MP 2035 FEIR.

➤ MP 2035 Mitigation Measures

Construction

- N1** Construction activity that would last more than a day, that would increase ambient noise by more than 5Dba, and would be located within 500 feet of a sensitive land use shall incorporate measures to reduce noise levels at sensitive receptors

including, but not limited to, sound walls, sound blankets on impact equipment, and engine mufflers to reduce noise levels to acceptable levels. The noise reduction levels achieved by the measures shall limit noise increases to less than 5dBA over the ambient levels.

Operation

No feasible mitigation measures were identified to reduce the significant impact related to bus frequency to less than significant. Reducing bus frequency is not considered as a feasible mitigation measure because the action would not meet the goal of the proposed mobility improvement.

➤ Significance of Impact after Mitigation

Construction

Construction noise was determined to result in a significant impact without mitigation. Mitigation Measure N1 would reduce construction noise within 500 feet of sensitive land uses to less than a 5 dBA incremental increase from existing noise levels. For example, the Los Angeles CEQA Thresholds Guide states that engine mufflers reduce noise levels by at least 3 dBA. Impacts would be reduced to less than significant.

Operation

No feasible mitigation measures were identified to reduce the significant impact related to bus frequency to less than significant. Therefore, the MP 2035 would result in a significant and unavoidable impact related to bus noise. However, no new substantial or significant noise and vibration impacts have been identified for the Project that would result in new or more severe significant environmental impacts.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

(b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	N2	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.5-2 Less than significant with mitigation	

Construction

The MP 2035 FEIR identified significant impacts related to groundborne vibration and groundborne noise without mitigation. It is anticipated that construction activity related to the Project may require small loaders and similar construction equipment, which could result in exposure of persons to or a generation of excessive groundborne vibration or groundborne noise levels. **Table 4** shows

construction equipment vibration levels based on various reference distances. Construction vibration is a localized event and is typically only perceptible to a receptor that is in close proximity to the vibration source. Construction vibration levels associated with small loaders and bulldozers would not be expected to exceed the FTA criteria of 0.3 inches per second for engineered concrete and masonry buildings (typical of residential buildings and institutional buildings). It is not anticipated that construction equipment would be within 11 feet of buildings although it cannot be dismissed without detailed construction plans. At 11 feet or less, vibration levels could exceed the FTA criteria of 0.3 inches per second. Therefore, without mitigation, the MP 2035 project would result in a significant impact related to construction. However, with Mitigation Measure N2, the vibration impacts would be reduced to less-than-significant. No substantial changes in the environment related to vibration have occurred since certification of the MP2035 FEIR, and no substantial new significant vibration impacts have been identified with relation to the Project that would result in new or more severe significant environmental impacts.

TABLE 4 : VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT				
Equipment	PPV at 15 feet (Inches/Second) /a/	PPV at 25 feet (Inches/Second) /a/	PPV at 50 feet (Inches/Second) /a/	PPV at 100 feet (Inches/Second) /a/
Small Bulldozer	0.003	0.003	0.0001	0.0004
Large Bulldozer	0.191	0.089	0.031	0.011

/a/ Non-engineered timber and masonry buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage.
SOURCE: FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

Operation

The Project would not include stationary sources of vibration, such as heavy equipment or industrial operations. Operational vibration in the project vicinity would be generated by vehicular travel on the local roadways. According to the FTA *Transit Noise and Vibration Impact Assessment* guidance document, vibration from traffic is rarely perceptible.⁸ Project related traffic vibration levels would not be perceptible by sensitive receptors. In addition, the measures in accordance with the Project would provide pedestrian and bicycle facilities and would be serviced by local transit and would not generate significant vehicular trips and therefore would largely reduce the exposure of nearby land uses and other sensitive receptors to perceptible vibration levels. Therefore, the Project would result in a less-than-significant impact related to vibration. No mitigation measures required.

➤ MP 2035 Mitigation Measures

Construction

- N2** A project-specific vibration analysis shall be completed if the City determines that construction equipment would be located within 11 feet of non-engineered timber and masonry buildings (typical of residential buildings and institutional buildings). Potential vibration impacts shall be mitigated to such that vibration levels do not exceed 0.3 inches per second at 11 feet. Methods to reduce vibration included, but are not limited to, choosing to use light weight equipment when an option between equipment types is available and avoiding impact equipment.

Operation

None required.

⁸ FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

➤ Significance of Impact after Mitigation

Construction

Construction related to the MP 2035 was determined to result in a significant impact without mitigation. Mitigation Measure **N2** would ensure that construction noise requiring heavy-duty equipment would not exceed the significant threshold for activity occurring within 11 feet of non-engineered timber and masonry buildings (typical of residential buildings and institutional buildings). As a mitigation example, a small bulldozer can generate 98 percent less vibration than a large bulldozer.⁹ Therefore construction-related vibration impacts would be less than significant after mitigation.

Operation

Vibration impacts related to operations would be less than significant.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

- (c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are applicable.
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.5-3 Significant	

Construction

Construction noise is temporary in nature and does not relate to this criterion.

Operation

Impacts were determined to be less than significant except for those related to the Transit Enhanced Network (TEN). See the discussion in Section 3.5(a) in this Addendum for a discussion of noise related to MP 2035 and Project operations. The Project includes optional TDM strategies that would increase bus or shuttle service, within the parameters of what was evaluated in the MP 2035 FEIR. Based on the aforementioned, the Project would not foreseeably result in new or more significant noise and or vibration impacts from those identified in the MP 2035 FEIR.

➤ MP 2035 Mitigation Measures

No mitigation measures are applicable.

⁹ *Ibid*

➤ Significance of Impact after Mitigation

No feasible mitigation measures were identified to reduce the significant impact related to bus frequency to less than significant. Therefore, the MP 2035 would result in a significant and unavoidable impact related to bus noise. However, no new substantial or significant noise and vibration impacts have been identified for the Project that would result in new or more severe significant environmental impacts.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	N1	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.5-4 Less than Significant	

Construction

The MP 2035 FEIR indicates that anticipated construction noise would increase ambient noise levels by more than 10 dBA for activities lasting more than one day, and by more than 5 dBA for construction activities lasting more than ten days in a three-month period. This would result in a substantial temporary or periodic increase in ambient noise levels in the MP 2035 project vicinity above levels existing without the MP 2035 project. Therefore, the MP 2035 project would result in significant impact related to construction noise without mitigation. With Mitigation Measure N1, the MP 2035 FEIR identified the impact related to temporary increase in noise levels would be reduced to less than significant.

Construction in accordance with the Project would be required to comply with all LAMC requirements. In addition, all stationary equipment would be located as far as possible from noise receptors. Development in accordance with the Project would not result in new or substantially increased temporary or periodic noise as compared to what was evaluated in the MP 2035 FEIR. The Project would result in less than significant impacts with respect to temporary or periodic increases in noise. No additional mitigation measures required.

Operation

Operational noise is permanent in nature and does not relate to this criterion.

➤ MP 2035 Mitigation Measures

N1 Construction activity that would last more than a day, that would increase ambient noise by more than 5 dBA, and would be located within 500 feet of a sensitive land

use shall incorporate measures to reduce noise levels at sensitive receptors including, but not limited to, sound walls, sound blankets on impact equipment, and engine mufflers to reduce noise levels to acceptable levels. The noise reduction levels achieved by the measures shall limit noise increases to less than 5dBA over the ambient levels.

➤ Significance of Impact after Mitigation

Mitigation Measure **N1** would reduce temporary and periodic construction activity to less than significant.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

- (e) For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- (f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		(e) No mitigation measures are necessary (f) No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	(e) Impact 4.5-5 No Impact (f) Impact 4.5-6 No Impact	

Construction and Operation

The MP 2035 FEIR identified no impact related to proximity to public or private airports. Major public airports have airport land use plans that provide guidance on noise levels and land use in adjacent areas, including noise source control and noise mitigation for certain land uses (residences, schools, hospitals, churches and libraries) that are rendered incompatible due to airport noise impacts. The MP 2035 FEIR concludes that mitigation measures are not required.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or uses of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals.

There are a number of airports located within the City of Los Angeles, two public airports and one general aviation, respectively: LAX, Van Nuys Airport and Whiteman Airport. The MP 2035 FEIR

indicated that construction workers associated with the Project could be located within 2 miles of Van Nuys airport, Hawthorne Municipal Airport, Burbank Airport, and Santa Monica Airport. The MP 2035 FEIR does not anticipate construction activity occurring on airport property or directly adjacent to flight paths. It is not anticipated that airport-related noise levels would be louder than equipment noise levels at construction zones due to the distance from the airports to the construction workers. There are no private airstrips that would be located in the vicinity of project related enhancements.

Development and enhancements associated with the Project in that they occur at or near a development site that is subject to the Proposed TDM Ordinance may occur on airport property or directly adjacent to flight paths, but would not exacerbate those sources of noise. The Project would not expose construction workers or people to excessive airport noise, nor would it exacerbate airplane noise. Therefore, no impact would occur. No mitigation measures required.

3.8 Transportation, Parking and Safety

Transportation, parking, and safety impacts are analyzed in Section 4.1 of the FEIR. The FEIR's analysis focuses on the effect of implementation of the Mobility Plan 2035's Enhanced Networks in the City of Los Angeles. For thresholds (c), (d), (f), and (g), the FEIR determined that implementation of the MP2035 would not result in any significant impacts. Although threshold (e) was determined to be potentially significant in the FEIR, the Second Addendum to MP2035 determined that it is not reasonably foreseeable at this time that it will result in a significant impact to emergency access. As for thresholds (a) and (b), the FEIR determined the impacts would be significant.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

- (a) **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?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	T1 T2	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.1-2 Significant	

The MP 2035 FEIR identified potentially significant impacts to transportation and the circulation system, based on a level of service (LOS) analysis modeling a worst-case, vehicle-centric estimate based on historical travel behavior patterns that do not account for additional changes in demographics, vehicle ownership patterns, energy prices, and migration to walkable and transit-served locations that would lead to decreasing vehicular volumes.

The MP 2035 FEIR identified two mitigation measures that would reduce impacts related to MP 2035, though the significant unavoidable impact related to LOS remained. Mitigation Measure T1 calls for adjusted traffic signal timing as necessary. Mitigation Measure T2, quoted in full below, calls for the City to implement appropriate TDM measures.

The Project is partial fulfillment of Mitigation Measure T2. The Project updates the City's TDM Ordinance to require more projects to implement TDM strategies and provide a broader range of modern, evidence-based TDM strategies. The Project is part of the City's comprehensive approach to mobility, which comprises reforming transportation impact analysis methods, maintaining safe and efficient street operations, and delivering world-class complete streets. The Project aims to improve mobility options and minimize impacts of new developments on the City's transportation system by increasing sustainable travel options and reducing vehicle miles traveled (VMT) and single occupancy vehicle (SOV) trips.

The MP 2035 FEIR highlighted the implementation of TDM strategies as having the potential to reduce trips, improve the efficiency of the transportation system and to reduce environmental impacts with strategies such as bike share, expansion of car share programs near high density areas, bus stop improvements (e.g. shelters and "next bus" technologies), crosswalk improvements,

pedestrian wayfinding signage, etc. Each of the strategies listed in the Mitigation Measure are included in some way in the Project. Therefore, the Project was evaluated in the MP 2035 FEIR and the Project would not cause any new significant environmental impacts.

➤ **MP 2035 Mitigation Measures**

The following mitigation measures identify physical improvements to intersections that would reduce project impacts as they relate to the MP 2035. Physical intersection improvements that would conflict with the MP 2035 goals were considered to be infeasible. In support of MP 2035, T2 is directly aligned with the Project.

T1 LADOT will adjust traffic signal timing after the implementation of the proposed project (both along project routes and parallel roadways if traffic diversions have occurred as a result of the proposed project). This adjustment would be necessary, especially at the intersections where roadway striping would be modified. Signal timing adjustment could reduce traffic impacts at impacted intersections. (LADOT routinely makes traffic signal timing changes and signal optimization on an as-needed basis to accommodate the changes in traffic volumes to reduce congestion and delay in the City.)

T2 The City shall implement appropriate TDM measures in the City of Los Angeles including potential trip-reducing measures such as bike share strategies, bike, expansion of car share programs near high density areas, bus stop improvements (e.g. shelters and “next bus” technologies), crosswalk improvements, pedestrian wayfinding signage, etc.

➤ **Significance of Impact after Mitigation**

Mitigation Measures T1 and T2 would ensure that mitigation measures would be completed to reduce the level of impacts. Even with the mitigation measures, the MP 2035 FEIR found the MP 2035 would have significant impacts related to vehicular LOS. The Project implements Mitigation Measure T2. As such, the Project would reduce impacts related to vehicular LOS in at least some locations in the City. The Project would not create new or substantially greater impacts than evaluated in the MP 2035 FEIR, and would reduce VMT, which has replaced LOS as the metric for CEQA analysis. Circulation system impacts from the Project would be less than significant and no additional mitigation measures are required.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

- (b) **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?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	T4	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.1-4 Significant	

California Government Code Section 65088.3 allows counties to opt out of Congestion Management Program (CMP) requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program. On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP.

As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

➤ MP 2035 Mitigation Measures

- T4** In areas where the implementation of the MP 2035 could potentially affect transportation systems managed by other agencies, such as Caltrans or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements in accordance with the goals and policies of MP 2035 and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing TDM measures to achieve both local and regional transportation and sustainability goals.

➤ Significance of Impact after Mitigation

The MP 2035 FEIR found that implementation of Mitigation Measure T4 with reference to MP 2035 would reduce the level of impact related to freeways and the CMP, but impacts could remain significant. The MP 2035 could still have a significant impact related to CMP freeway segments as it could continue to exceed the established threshold. However, since that time the provisions of CMP no longer apply to the City of Los Angeles. The Project would have no impact, and no additional mitigation measures required.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.1-7 Less Than Significant	

The MP 2035 FEIR identified less-than-significant impacts related to design feature safety hazards. The transportation improvements proposed in the MP 2035 and in the Project are not expected to introduce new safety hazards at intersections or along roadway segments, as most would be designed to improve safety for all roadway users.

The implementation of bicycle facilities associated with the MP 2035 and as a potential TDM strategy available as part of the Project, is anticipated to improve safety and health outcomes for bicyclists and other road users. Automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users. Collisions with a vehicle traveling at 20 miles per hour results in a 5 percent pedestrian fatality rate, and fatalities increase to 40, 80, and 100 percent when vehicle speeds increase to 30, 40, and 50 miles per hour respectively.¹⁰ Bicycle lanes when accompanied by curb extensions can help reduce overall speed. The upgrade to fully protected bicycle lanes or cycle tracks has been shown to reduce the risk of injury by 90 percent.¹¹

The Project would not result in impacts related to safety. Measures and or improvements that may be selected to be implemented in accordance with the Project, are not anticipated to result in hazards due to design features or increase conflicts between incompatible uses because TDM measures selected for implementation would be appropriate to the use of the development project and enhancements in the public right of way would comply with the city's design and engineering standards and Complete Streets Design Guide. Further, the menu of optional TDM strategies is supported by empirical evidence documenting the potential to reduce vehicle travel and the load on existing infrastructure and service capacity. The Project would not result in changes made that would impede access to any public right of way because the TDM strategies are designed to enhance access, and any potential impacts to traffic are speculative and would require detailed engineering plans and/or a separate environmental review to determine potential traffic impacts. Therefore, implementation of the Project would have a less than significant impact related to design feature safety hazards. No mitigation measures are required.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

(d) Result in inadequate emergency access?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts	T5	
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.1-5 Less than Significant per 2 nd Addendum	

As stated in the Second Addendum to MP 2035 FEIR, after a review of the LAFD 2015 Strategic Plan and consultation with LAFD staff, the City found that there is not a significant impact to emergency access from the Updated Mobility Plan. This Third Addendum to MP 2035 FEIR shows

¹⁰ U.S Department of Transportation National Highway Traffic Safety Administration. *Literature Review on Vehicle Travel Speeds and Pedestrian Injuries*. DOT HS 809 021, 199.

¹¹ FHWA website. <http://www.fhwa.dot.gov/publications/research/safety/10053/index.cfm>.

the proposed TDM Project would continue to have a less than significant impact on emergency access.

The RDEIR concluded that the MP 2035 would have a potential significant impact related to inadequate emergency vehicle access. However, ultimately the conclusion in the MP 2035 FEIR was made in an effort to take a conservative approach for purposes of identifying CEQA impacts. However, the MP 2035 RDEIR also concluded, “there is not a direct relationship between predicted travel delay and response times.” (RDEIR at 4.1-44). The RDEIR recognized that a number of factors could affect response times, including the requirement under state laws for drivers to yield the right-of-way to emergency vehicles and because the proposed Design Guidelines include roadway configurations that could facilitate emergency access when traffic is congested. The RDEIR included a Mitigation Measure that LADOT, LAFD, and DCP coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained. Ultimately, the Final EIR concluded that after imposition of mitigation measures, “in the interest of being conservative,” impacts are considered potentially significant.

However, the Second Addendum to the MP 2035 FEIR demonstrated that the City’s conclusion was based solely on an assumption of a correlation between congestion and emergency response time. In light of the whole of the administrative record, the City concluded that while the MP 2035 would increase congestion it is not reasonably foreseeable that it would result in a significant impact to emergency access. The LAFD is responsible for maintaining adequate response times, and the LAFD Strategic Plan addresses maintaining service including access.

The Project is an implementation program of the MP 2035. The Project will help new residents, employees, and visitors minimize their reliance on vehicular travel and parking by reducing SOV use and VMT generated from new developments. The program relies on TDM strategies that will shift travel to sustainable travel options. Offering and incentivizing attractive sustainable travel options can reduce the number and length of vehicle trips. Ultimately, this effort can achieve more efficient use of our roads and the PROW, reduce transportation related greenhouse gas emissions, and improve quality of life benefits.

These potential enhancements would not add to congestion resulting in delayed emergency response times or result in inadequate emergency access. Any lane closures as a result of implementation of TDM measures in accordance with the Project would require approval from LADOT. Such approval would only be given contingent on standard construction techniques that avoid potential impact.

Therefore, the implementation of the Project would have a less than significant impact on emergency access and no additional mitigation is necessary.

➤ MP 2035 Mitigation Measure

- T5** LADOT, LAFD and DCP shall coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained (for example by expanding the Fire Preemption System).

➤ Significance of Impact after Mitigation

The LAFD Strategic Plan addresses maintaining service including access. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include increased staffing levels and new fire stations(s) in underserved areas. LAFD has not identified the need for any new fire stations or fire or emergency facilities from the Mobility Plan (including its updates). Therefore, any construction impacts associated with new fire protection facilities would be speculative.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

(e) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		No mitigation measures are necessary
Where Impact was Analyzed in Prior Environmental Documents	Impact 4.1-1 Less Than Significant	

The MP 2035 includes goals and policies to ensure efficient circulation within the City and region, and proposes an extensive network of transit, bicycle and vehicle corridors (TEN, BEN, NEN, and VEN) as well as neighborhood enhancements. The Project builds upon the goals, policies and objectives of the MP 2035, and includes a number of strategies to help achieve the City's transportation objectives.

The 2012-2035 and 2016-2040 RTP/SCS provides a regional plan to meet region specific GHG reduction targets. The 2016-2040 RTP/SCS identifies a variety of strategies to be employed across the region to link transportation and land use planning in order to reduce greenhouse gas emissions. In response to the 2012-2035 RTP/SCS, the City initiated MP 2035. MP 2035 provides a City-wide coherent transportation plan to provide the transportation framework on which to build balanced land use plans through community plan updates.

The proposed Project would have a significant impact if it would disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities, or create conflicts or inconsistencies with adopted public transit, bicycle, or pedestrian system plans, guidelines, policies, or standards.

The Project implements the Mobility Plan 2035, the adopted Transportation Element of the City's General Plan, whose comprehensive approach to mobility addresses the challenges of "environmental constraints, public health issues, regional inequity, and some of the longest traffic delays in the nation."¹² Specifically, the Project advances the Mobility Plan 2035 goal of fostering collaboration, communication, and informed choices citywide by implementing Policy 4.8, which aims to "encourage greater utilization of TDM strategies to reduce dependence on single-occupancy vehicles."¹³

The multimodal transportation vision set forth in Mobility Plan 2035 relies on reducing demand for SOV use and VMT. The Project is designed to provide new developments throughout the City with tools to reduce VMT and SOV generated by employees, residents, and visitors. The TDM strategies available to employers and developers through the Project aim to shift trips from driving alone to more sustainable travel options. Many of the TDM strategies and measures in this TDM Program are also strategies of the MP 2035 objectives, policies and programs.

¹² Mobility Plan 2035, p. 13.

¹³ Ibid, p. 109.

The regulations and TDM strategies of the Project are consistent with the goals and policies of the MP 2035, in particular the policies listed in Section 2.1 of this Addendum. The MP 2035 RDEIR analyzed the MP 2035 for consistency with the 2016-2040 RTP/SCS and found it to be consistent. The Project, as an implementation of the MP 2035 would not conflict with the adopted policies, plans, or programs in the MP 2035 or 2016-2040 RTP/SCS regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, the Project would have a less than significant impact related to consistency with other plans.

Does the Project require Subsequent or Supplemental CEQA documentation with respect to the following:

(f) Result in inadequate parking capacity?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project.	☐	✓
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	✓
New or Substantially More Severe Significant Impacts Shown by New Information Requiring New Analysis or Verification?	☐	✓
Prior Environmental Documents Mitigations Implemented or Address Impacts		none
Where Impact was Analyzed in Prior Environmental Documents	Less Than Significant	

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents must address the secondary physical impacts that would be triggered by a social impact (CEQA Guidelines Section 15131, Economic & Social Effects). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, noise impacts caused by congestion, or land use impacts.

Transportation analysis in the MP 2035 FEIR accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking along study streets and then seek parking farther away if convenient parking is unavailable. There is also the potential for secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, noise impacts caused by congestion, or land use impacts. The Project would have a significant impact if secondary effects related to parking contribute to impacts described by the other significance thresholds. However, the secondary effects of drivers searching for parking is typically off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking are anticipated to be minor and other transportation analyses reasonably address potential secondary impacts.

The Project advances the Mobility Plan 2035 goal of fostering collaboration, communication, and informed choices citywide by implementing MP 2035 Policy 4.8, which aims to “encourage greater utilization of TDM strategies to reduce dependence on single-occupancy vehicles.”¹⁴ Citywide, TDM policies and rules work holistically to reduce the need for expanded street capacity, decrease monetary and opportunity costs of parking, improve air quality, and offer more mobility options to

¹⁴ Mobility Plan 2035, p. 13.

communities. Mobility Plan 2035 identifies TDM as a solution that “can reduce the percentage of commuters who drive alone by raising awareness of available alternatives and by offering incentives to make those alternatives more attractive,” thereby reducing the need for vast amounts of parking. TDM measures that have been selected as menu options are supported by empirical evidence documenting the potential to reduce VMT and SOV, with strategies that offset vehicle trip and parking demand.

There is strong evidence that other parking-management techniques directly impact transportation behavior choices as well as mitigate traffic and parking demand. Pricing parking or unbundling its costs from that of the rent can create more equitable solutions for low-income residents who do not own automobiles. Parking cash-out, though applicable only to employment land uses, is especially effective in reducing SOV trips and thereby reducing congestion in employment centers. It is anticipated that a long-term obligation to these measures will increase the efficient utilization of parking supply while maintaining access and providing data for better future decision making.

The Project includes programmatic strategies such as priced parking for building users. Pricing encourages non-SOV use and can be accomplished in several ways. Property managers and homeowner associations can unbundle parking from rents or sale of units so tenants or owners can pay for each separately, and/or buildings can charge shoppers. Other TDM strategies that balance the need for parking can include: implementing a “cash out” program, where employees who do not use a parking space are paid the value of the space instead; sharing parking among different land uses and tenants within a mixed use development; providing public access to on-site parking, and on-demand parking availability publicized through mobile applications and/or public signage. This strategy is especially useful for properties that provide parking supply at rates above Los Angeles Municipal Code or Specific Plan requirements. For the Project, applicants selecting this measure would be required to make a certain amount of the total parking supply accessible to the public for use.

The Project does not introduce new mechanisms for development projects to reduce their minimum parking requirements. In the event that a development project is allowed through other zoning regulations or incentives (including but not limited to the Transit Oriented Communities Affordable Housing Incentive Program (TOC), Density Bonus, and the Bicycle Parking Ordinance) to reduce its parking supply, the proposed TDM Program will award points for reduced parking as a TDM strategy. However, the reduced parking supply strategy alone would not have a high enough point value to satisfy the TDM Ordinance requirements; it would need to be combined with other TDM strategies that also reduce SOV and VMT, achieving the Project objectives and reducing the need for parking in the first place.

Any secondary environmental impacts which may result from a shortfall in parking related to the Project are anticipated to be minor and other transportation analyses reasonably address potential secondary impacts. Therefore, the Project would result in less-than-significant impacts related to parking. No mitigation required.