# **CHAPTER 2**

## **EXECUTIVE SUMMARY**

### 2.1 Introduction

The purpose of the executive summary is to provide a clear and simple description of the project and its potential environmental impacts. Section 15123 of the State CEQA Guidelines requires the executive summary to identify each significant effect of a proposed project, along with proposed mitigation measure(s) and alternatives that would minimize or avoid that effect. The summary is also required to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

## 2.2 Project Location and Setting

The Project study area is in the western portion of the City of Los Angeles (the "Westside") and encompasses the Coastal Transportation Corridor Specific Plan (CTCSP) area and the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) area (see Figure 2-1). The CTCSP area includes all or parts of the Westchester-Playa Del Rey, Palms-Mar Vista-Del Rey, and Venice Community Plan areas and the LAX Plan area. The CTCSP area is generally bounded by the City of Santa Monica on the north, Imperial Highway on the south, the San Diego Freeway (I-405) on the east, and the Pacific Ocean on the west. The WLA TIMP area includes all or parts of the Westwood, West Los Angeles, Brentwood-Pacific Palisades, and the Palms-Mar Vista-Del Rey community plan areas, and is generally bounded by the City of Beverly Hills/Beverwil Drive/Castle Heights Avenue/National Boulevard/Hughes Avenue on the east; Sunset Boulevard on the north; the City of Santa Monica and Centinela Avenue on the west; and Venice Boulevard on the south.

The Project study area is primarily highly urbanized with a variety of land uses including residential, industrial, office, public facilities, and commercial uses. The study area also encompasses open space and parks, including the Ballona Wetlands Ecological Reserve and the Los Angeles/El Segundo Dunes.

## 2.3 Project Description

The Proposed Project consists of amendments to the CTCSP and WLA TIMP. The amendments include an update to the list of transportation improvements and mitigation measures to be funded, in part, by the impact fees collected from new development; an update to the Transportation Impact Assessment (TIA) fee program, including revisions to the fees, trip generation rates, exemptions, in-lieu credits, and affordable housing credits; and a new transit-oriented development (TOD) credit. The Proposed Project's updated project lists include the following categories of transportation improvements: transit, bicycle and pedestrian, roadway & intelligent transportation system (ITS), and trip reduction programs. Other proposed changes include administrative amendments and minor revisions that are consistent with recent California State legislation, transportation policies in the City's General Plan Elements, and LADOT's Traffic Study Policies and Procedures, and are in line with current best planning practices.

The CTCSP and WLA TIMP were adopted in 1985 and 1997, respectively, with the purpose of establishing a TIA program to be assessed on new development and intended to assist in the implementation of future transportation improvements on the Westside. The TIA fees were established by Specific Plan ordinances and have been a part of the development approval process in the Westside since adoption.

### 2.3.1 Project Background

The west side of Los Angeles, like many other urban areas throughout the country, experiences significant traffic congestion. Despite an extensive street network, vehicular circulation continues to deteriorate due to historical over-reliance on the car as the primary mode of transportation. The combination of many regional destinations, oversaturated roadways, unreliable travel times for autos and transit, and limited north-south transit options underlie the need for creating a transportation plan for the Westside that will better serve all modes of transportation, improve the connectivity and person throughput of the overall system, and enhance the livability along major boulevards in Westside communities.

To address the transportation issues on the Westside, the Los Angeles City Council directed the Department of Transportation (LADOT), in conjunction with the Department of City Planning (DCP), to undertake a comprehensive study to develop potential short-term solutions and long-term plans to address congestion and mobility challenges within this geography of the City. The comprehensive study, called the Westside Mobility Plan (WMP), was undertaken to update the long range vision that would facilitate a more balanced modal approach toward improving mobility on the Westside. The WMP study area is made up of the combined boundaries of the CTCSP and WLA TIMP areas. The Community Plans for the project-area¹ cite the CTC and WLA TIMP as programs to help implement regional and sub-regional transportation projects.

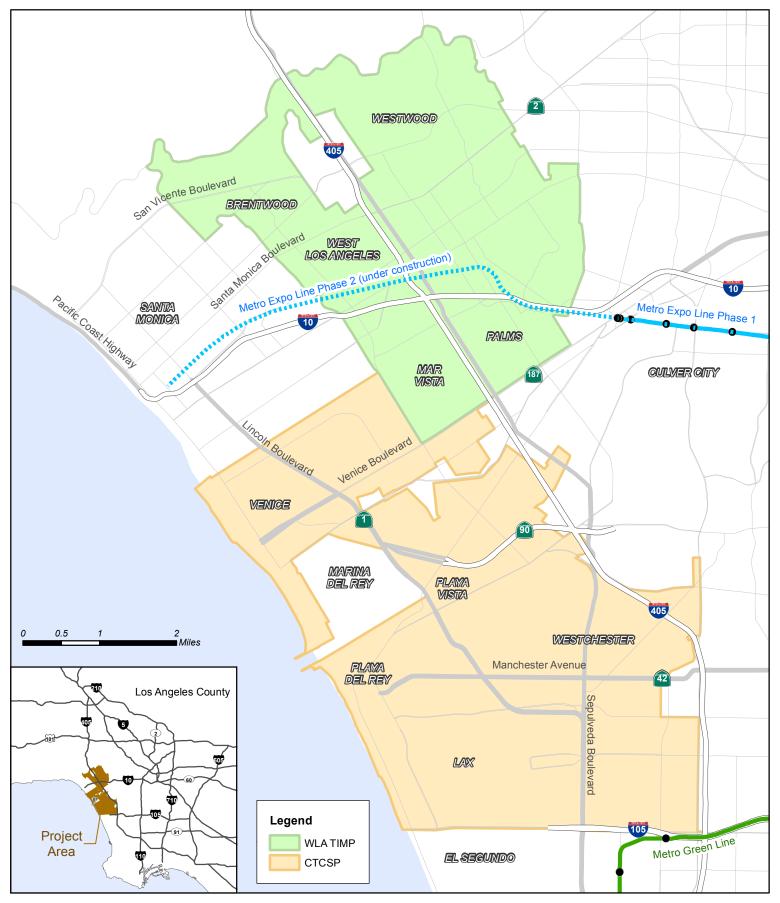
The proposed amendments to the CTCSP and WLA TIMP, as derived from the WMP, are consistent with the City's multimodal approach to transportation planning and apply such principals to the Westside in a more targeted manner.

### 2.3.2 Proposed Specific Plan Amendments

#### **Amendments to Impact Fee Assessment and Methodology**

The Proposed Project would revise the TIA fees required under each Specific Plan and corresponding ordinance. To determine the appropriate fee updates, a study was conducted to establish the nexus between new development that occurs in the study area and the need for new and expanded transportation facilities and programs, which include transit, bicycle and pedestrian oriented improvements in addition to the more traditional roadway and signalization improvements. After establishing the nexus, the study calculated the TIA fees to be levied for each type of land use. The amount of the TIA fees is based on each land use's proportionate use of the transportation facilities in total. These updated fees have been incorporated into the proposed amendments to the Specific Plans.

The following Community Plans in the project area cite the CTCSP and WLA TIMP: Brentwood-Pacific Palisades, Palms-Mar Vista-Del Rey, Venice, Westchester-Playa Del Rey, West Los Angeles, and Westwood.



Source: U.S. Census Bureau, Geography Division, 2010

Figure 2-1 Project Location Map



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The traditional approach to nexus studies has more often than not involved using automobile Level of Service (LOS) as a performance measure for the transportation system. As part of the proposed amendments to the CTCSP and WLA TIMP, alternative performance measures, such as vehicle miles of travel (VMT), person capacity and throughput, travel time, and accessibility have been used to gauge the effectiveness of the proposed mobility improvements. For this study, the nexus for the TIA fee updates is established using VMT per capita as a performance measure. The intent of this fee is to fund improvements for multiple modes of travel, such as motor vehicles, pedestrians, bicycles, and transit. Under the Proposed Project, the trip generation rates are proposed to be incorporated into the TIA fee tables for each Specific Plan area based on the nexus study.

The proposed amendments would also modify current TIA fee exemptions. In each Specific Plan area, some land uses, such as schools, residential uses, places of worship, and local serving uses, are currently exempt from paying the TIA fee. The proposed CTCSP and WLA TIMP amendments would remove the exemption for single-family and multi-family residential development, with the exception of affordable housing units. In addition, local serving uses, the first 30,000 square feet of shopping centers (currently exempt in the WLA TIMP), and freestanding commercial or medical office projects of less than 20,000 square feet (currently exempt in the CTCSP), would no longer be exempt from an impact fee. Amendments would also be made relative to in-lieu credits, affordable housing credits, and transit-oriented development credits. Details of these amendments are provided in Chapter 3, *Project Description*.

#### **Amendments to the List of Transportation Improvements**

The proposed amendments include updating the list of transportation improvements funded in part by the TIA fees in each Specific Plan area. The new projects, identified through an analysis of completed projects and a public outreach component of the WMP process (including consultation with neighboring jurisdictions, Metro, and the California Department of Transportation [Caltrans]), are aimed at improving the existing transportation network, enhancing system capacity, reducing vehicle trips and VMT, and improving transit connectivity. For purposes of the EIR analysis, the transportation improvements proposed for inclusion in the CTCSP and WLA TIMP amendments are assumed to be implemented by 2035. The Proposed Project's updated project lists includes the following categories of transportation improvements: transit, bicycle and pedestrian, roadway & ITS, and trip reduction programs.

## 2.4 Project Objectives

The objectives of the transportation improvements that would be funded by the proposed amendments to the Specific Plans are as follows:

### **Primary Objectives of the Transportation Improvements:**

- Provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, vehicle), within existing available right-of-way (ROW), as part of a transportation system that is consistent with the City of Los Angeles' General Plan Framework Element and General Plan Mobility Element; Community Plans for the Westwood, Brentwood-Pacific Palisades, West Los Angeles, Palms-Mar Vista-Del Rey, Venice, and Westchester-Playa Del Rey communities; and the LAX Specific Plan.
- Produce fewer auto trips per capita and decrease VMT per capita by increasing multimodal transportation options and promoting best practices in transportation demand management.

- Reduce greenhouse gas emissions, as mandated by Assembly Bill (AB) 32 and Senate Bill (SB)
   375, by reducing automobile dependence and offering multiple modes of transportation.
- Enhance mobility along key Westside transportation corridors within the Specific Plan areas, particularly by planning for dedicated transit lines that serve north-south corridors and provide connections to planned east-west transit lines.
- Enhance the transportation system by planning for better regional transit connectivity and "first mile-last mile" solutions (such as better pedestrian conditions, bike share/improved bicycle facilities, and circulator bus service).
- Encourage walking and bicycling as a means to safely and conveniently access transit and circulate within and between neighborhoods.
- Develop a multimodal transportation plan for the Westside that reflects the collective input of Westside community members, as gathered through a formal public outreach process.
- Develop transportation improvements that reflect consultation with multiple neighboring jurisdictions, transit service providers, and transportation planning agencies on the Westside.
- Develop a transportation system on the Westside that is efficient, sustainable, feasible, and fiscally responsible.

#### **Secondary Objectives of the Transportation Improvements:**

- Enhance the streetscape environment on portions of major arterials by improving neighborhood aesthetics and identity; implementing sustainable landscaping practices; bolstering local business patronage; and providing a pleasant and safe active transportation experience.
- Identify different types of parking strategies, such as demand-based pricing schemes, capacity management, travel demand management programs, and urban design guidelines, to manage parking supply.

The objectives of the proposed amendments to the Specific Plans include the following:

#### **Primary Objectives of the Specific Plan Amendments:**

• Develop amendments to the CTCSP and WLA TIMP that are aligned with city and state policies concerning transportation, including the City of Los Angeles' General Plan Framework Element, General Plan Mobility Element, LADOT Traffic Study Policies and Procedures, and State legislation (including AB 3005 and SB 743) that reprioritize transportation improvements to focus on access to transit and active transportation as strategies to reduce dependence on vehicular travel, and reduce VMT and associated greenhouse gas emissions.

- Develop amendments to the CTCSP and WLA TIMP that are aligned with City policies for the study area, as articulated in the Community Plans for the Westwood, Brentwood-Pacific Palisades, West Los Angeles, Palms-Mar Vista-Del Rey, Venice, and Westchester-Playa Del Rey communities, and the LAX Specific Plan.
- Ensure the costs for transportation improvements within the study area are fairly distributed among all future land uses that will contribute to transportation impacts.
- Update TIA fees to provide a mechanism to fund specific transportation improvements that aims to decrease the cumulative impacts of new development and increase person throughput by increasing mobility options within the Westside.
- Update the TIA fee methodology to better align with a multimodal approach to planning for future transportation improvements.
- Update the TIA fee methodology to reflect an improved approach for measuring and addressing transportation impacts.

#### **Secondary Objectives of the Specific Plan Amendments:**

- Establish TIA fees that do not hinder the development of housing for diverse income levels in the Westside, including affordable housing for moderate, low, and very low income levels.
- Streamline the Specific Plan implementation process by aligning the CTCSP and WLA TIMP Specific Plan procedures with established City procedures.
- Develop consistent policy language between the CTCSP and WLA TIMP in order to make them easier to implement and administer.

## 2.5 Alternatives to the Project

CEQA requires that an EIR describe a range of reasonable alternatives to a proposed project that could feasibly avoid or lessen any significant environmental impacts, while attaining the basic objectives of the project. The alternatives analyzed in this EIR are:

#### Alternative 1 - No Project

Section 15126.6(e) of the State CEQA Guidelines requires evaluation of the No Project Alternative. As described in the State CEQA Guidelines, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, as required by the State CEQA Guidelines, the No Project Alternative consists of conditions that might be expected to occur in the foreseeable future if the Proposed Project was not approved.

The No Project Alternative assumes continued implementation of current CTC and WLA TIMP Specific Plans, with continuation of current fees (with annual adjustments) and implementation of existing project lists. Under the No Project Alternative, select roadway widenings and intersection improvements would continue to remain on the project lists, and more projects aimed at increasing vehicle capacity in the Westside would be considered for implementation.

#### Alternative 2A - No Sepulveda Boulevard BRT Alternative

Under Alternative 2A, the proposed Bus Rapid Transit (BRT) on Sepulveda Boulevard would be eliminated from the CTCSP and WLA TIMP proposed transportation improvement lists. The current lane configuration on Sepulveda Boulevard would be maintained (i.e., no loss of vehicular capacity).

#### Alternative 2B - No Lincoln Boulevard BRT Alternative

Under Alternative 2B, the proposed BRT on Lincoln Boulevard would be eliminated from the CTCSP proposed transportation improvement list. The current lane configuration on Lincoln Boulevard would be maintained (i.e., no loss of vehicular capacity).

#### Alternative 3A - Reduced Parking Alternative

The Proposed Project assumes that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under the Reduced Parking Alternative, when additional right-of-way is required, it would be provided solely by removing street parking, with no conversion of vehicle travel lanes. All of the transportation improvements associated with the Proposed Project are included in this alternative; this alternative offers a distinction as to how right-of-way would be utilized in order to implement the proposed transportation improvements.

#### Alternative 3B - Reduced Vehicle Capacity Alternative

The Proposed Project assumes that when additional right-of-way for projects (such as BRT and bicycle facilities) is needed, it would be provided through a combination of vehicular capacity reductions (lane conversions) along with on-street parking removal. Under this alternative, when additional right-of-way is required it would be provided solely by converting vehicle travel lanes into transit/bicycle facilities, with no removal of on-street parking. All of the transportation improvements associated with the Proposed Project are included in this alternative; this alternative offers a distinction as to how right-of-way would be utilized for the proposed transportation improvements.

# 2.6 Areas of Known Controversy

The State CEQA Guidelines require a Draft EIR to identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. Comments were received from public agencies and interested parties in response to the Notice of Preparation (NOP), which was originally circulated from May 22, 2014 to June 23, 2014, with the review period later extended by an additional 30 days to July 23, 2014. In addition, the City held two scoping meetings, one on June 5, 2014 and the other on June 9, 2014, to solicit comments and to inform the public of the proposed EIR. The NOP, along with comments received in response to the published NOP, are presented in Appendix C, *Notice of Preparation/Scoping*. The following environmental topics of potential controversy were identified during the scoping meetings and/or NOP process:

 Traffic congestion that could result from removal of vehicular travel lanes in order to provide for multi-modal transportation improvements

- Diversion of traffic into adjacent neighborhoods
- Parking availability, including provision of parking to support transit ridership and replacement of parking that would be lost with project implementation
- Safety, including safety of bus transit riders accessing center-running BRTs and safety of pedestrians on sidewalks adjacent to curb-running BRT
- Land use impacts from changes in TIA fees including potential impacts on the development of affordable housing
- Construction in Ballona wetlands

In addition, the comments were provided on the following details of the project description:

- Fees, including opposition to fees on residential projects, support for fees on residential projects, and alternative fee structures
- Fee exemptions
- Alternative funding mechanisms for transportation improvements
- Density bonuses
- Requests to add specific transportation improvements to the Proposed Project lists
- Requests to remove specific transportation improvements from the Proposed Project lists

### 2.7 Issues to be Resolved

The State CEQA Guidelines require the summary section of an EIR to present issues to be resolved by the lead agency. These issues include the choice between alternatives and whether or how to mitigate potentially significant environmental impacts. The major issues to be resolved by the City of Los Angeles, as the Lead Agency for the Proposed Project, include the following:

- Whether the Proposed Project or an alternative should be approved
- Whether the recommended mitigation measures should be adopted or modified
- Whether additional mitigation measures need to be applied to the project

## 2.8 Summary of Project Impacts and Mitigation Measures

A summary of the environmental impacts associated with the Proposed Project and mitigation measures proposed to avoid or lessen the severity of potentially significant environmental impacts is provided in **Table 2-1**, below. The level of significance of environmental impacts after mitigation is also identified in the table.

Table 2-1 Summary of Impacts and Mitigation Measures Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
4.1 Air Quality			
Impact 4.1-1: Implementation of the Proposed Project	would not conflic	t with or obstruct implementation of the applicable air quality plan.	
Construction Construction emissions would not exceed South Coast Air Quality Management District (SCAQMD) thresholds, and construction impacts would not conflict with or obstruct implementation of the Air Quality Management Plan (AQMP) or the City of Los Angeles Air Quality Element.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant
Operation  The transportation improvements would increase multi-modal mobility options and reduce VMT per Capita. As a result, the Proposed Project would be aligned with the goals of the 2012-2035 RTP/SCS as well as relevant air quality policy objectives of the City's Air Quality Element, Plan for a Healthy Los Angeles, and Mobility Plan 2035.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant
Construction Construction of the Proposed Project Construction Construction of the proposed transportation improvements would not exceed the SCAQMD maximum daily regional construction emissions thresholds for any pollutant.	Less Than Significant Impact	any air quality standard or contribute substantially to an existing or projected air c    None Required	Impact Would Remain Less Than Significant
Operation The emphasis of the transportation improvements on alternative modes of transportation would result in a reduction in VMT per Capita. In addition, with technological advances in vehicle emission controls, maximum daily emissions of CO, VOC, NOx, PM10, PM2.5, and SOx with operation of the transportation improvements would be lower than existing conditions and would not exceed the SCAQMD regional operational thresholds.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation		
mpact 4.1-3: Implementation of the Proposed Project would result in a cumulatively considerable net increase of criteria pollutants for which the air basin is in nonattainment O <sub>3</sub> precursors [NOx and VOC], PM10, and PM2.5) under an applicable federal or state ambient air quality standard.					
Construction – Regional Emissions  The regional construction emissions of the nonattainment pollutants PM10, PM2.5, and O3 precursors [NOx and VOC] would be less than the SCAQMD significance thresholds; regional construction emissions related to the Proposed Project would not be cumulatively considerable.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant		
Construction – Localized Emissions Localized construction-related peak daily particulate emissions associated with the Lincoln Boulevard Bridge Enhancement (PM10 and PM2.5), the Lincoln Boulevard and Sepulveda Boulevard BRTs (PM10), and the I-10 Ramp Reconfiguration at Bundy Drive improvements (PM10) could exceed SCAQMD's Localized Significance Thresholds (LSTs). Therefore, localized construction emissions would be cumulatively considerable.	Significant Impact – Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive Less than Significant Impact – Other Transportation Improvements	MM-AQ-1: Tier 3 Emission Standards and Diesel Particulate Filters, MM-AQ-2: Fugitive Dust Control, and MM-AQ-3: Construction Electricity. See text of measures in Impact 4.1-4 below.	Significant and Unavoidable Impact (Temporary and Short Term) — Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive Impact Would Remain Less Than Significant — Other Transportation Improvements		
Operation Operation of the proposed transportation improvements would result in a decrease in emissions of the nonattainment pollutants (PM10, PM2.5, and O <sub>3</sub> precursors [NOx and VOC]) compared to existing conditions. The Proposed Project would reduce VMT in the project area in the future as compared to future conditions without the Proposed Project, with a resulting decrease in all pollutants. Therefore, operation of the Proposed Project would not be cumulatively considerable.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant		

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation	
Impact 4.1-4: Implementation of the Proposed Project would expose sensitive receptors to substantial pollutant concentrations.				
Construction  Onsite localized construction emissions from the majority of the transportation improvements would not exceed the LSTs for applicable criteria pollutants. However, localized PM10 and PM2.5 emissions from the Lincoln Boulevard Bridge Enhancement and localized PM10 emissions from the Lincoln Boulevard and Sepulveda Boulevard BRTs and from the I-10 Ramp Reconfiguration at Bundy Drive could exceed the LST thresholds. Toxic air contaminant (TAC) emissions related to construction of these high construction intensity transportation improvements are anticipated to exceed the SCAQMD thresholds.	Significant Impact – Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive Less than Significant Impact – Other Transportation Improvements	MM-AQ-1: Tier 3 Emission Standards and Diesel Particulate Filters. All off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 emission standards when used during construction of the Lincoln Boulevard and Sepulveda Boulevard BRTs, Lincoln Boulevard Bridge Enhancement, reconfiguration of the I-10 ramps at Bundy Drive, and other projects that are demonstrated to result in significant impacts by project-specific modeling. If the contractor can demonstrate that a specific piece of Tier 3 equipment cannot be reasonably obtained, the contractor shall use equipment that meets USEPA Tier 2 emission standards and be equipped with a CARB-verified Diesel Emissions Control Strategies (VDECS). [Applies to Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive]  MM-AQ-2: Fugitive Dust Control. In order to ensure compliance with, or exceedance of, the requirements associated with SCAQMD Rule 403, construction activities shall include watering disturbed soil at least 3 times daily, or as often as necessary to maintain or exceed a soil moisture content of approximately 12 percent. Additional steps shall be taken, if necessary, to stabilize disturbed soil and stock piles to eliminate visible dust emissions. [Applies to Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive]  MM-AQ-3: Construction Electricity. Electricity for construction activities shall be obtained from power poles or portable diesel-fueled generators using "Clean burning diesel" fuel and exhaust emission controls. [Applies to Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive]	Significant and Unavoidable Impact (Temporary and Short Term) – Lincoln Boulevard Bridge Enhancement, Lincoln Boulevard BRT, Sepulveda Boulevard BRT, and I-10 Ramp Reconfiguration at Bundy Drive Impact Would Remain Less Than Significant – Other Transportation Improvements	
Operation  Mobile source air toxics (MSAT) emissions in the study area are likely to be lower in the future as a result of vehicle emission control technologies. Future levels of all pollutants, except NOx, would be lower with the Proposed Project than without the project.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant	

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
Impact 4.1-5: Implementation of the Proposed Project	would not create	objectionable odors affecting a substantial number of people.	
Construction Construction activities would be temporary and short-term in duration, and odors from diesel exhaust are not anticipated to affect a substantial number of people.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant
Operation The only source of operational odors would be from vehicles and transit facilities. SCAQMD does not identify mobile sources as a significant source of odors.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant
4.2 Biological Resources	<u>'</u>		
		bstantial adverse effect, either directly or through habitat modification, on any spe olicies, or regulations, or by the California Department of Fish and Wildlife (CDFW) o	
Construction Construction of the Lincoln Boulevard Bridge Enhancement could result in the destruction or alteration of habitat such that there would be an adverse effect on special-status species. In addition, the temporary generation of noise, emissions of air pollutants, and discharges that could affect water quality would affect special status species.  Transportation improvements, including the Lincoln Boulevard Bridge Enhancement, could result in the removal, trimming, or disturbance of street trees and ornamental landscaping which have the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code. Construction activities occurring within the nesting season have the potential to result in the removal or destruction of an active nest or direct mortality or injury of individual birds.	Significant Impact	MM-BR-1: Migratory Birds. To prevent the disturbance of nesting native and/or migratory bird species during construction, the City shall require that clearing of street trees or other vegetation take place between September 1 and January 30. If construction is scheduled or ongoing during bird or raptor nesting season (January 31 to August 31), the City of Los Angeles shall require that a qualified biologist conduct two nest surveys, one 15 days and the second 72 hours 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 200 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 200 feet of the nest, or an alternative distance determined to be appropriate by a qualified ornithologist or biologist, until the nesting cycle is complete, as determined by a qualified ornithologist or biologist.  MM-BR-2: Special-Status Species and Habitat. For CTCSP and WLA TIMP transportation improvement projects that would be constructed within 200 feet of a Significant Ecological Area designated by the County of Los Angeles, a project-specific biological resource survey and assessment shall be conducted by a qualified biologist and prepared prior to project construction that identifies the biological resources within 200 feet and any potential impacts to special status species and habitats. If it is determined during these biological resources surveys that special status species could occur and be impacted by the Proposed Project, focused surveys shall be conducted by a qualified or permitted biologist, as required, in coordination with USFWS and/or CDFW. If potential impacts are identified that cannot be avoided through modification of project design, species-	Less Than Significant

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
		and habitat-specific mitigation measures shall be developed to avoid or reduce project-related impacts. Such measures could include seasonal restrictions on construction, monitoring by a qualified biological monitor during construction, salvage and replacement of native plants, and restoration of sensitive natural communities or habitat following construction. These measures shall be established through the permitting process under Federal and State Endangered Species Acts, as appropriate.	
Operation The proposed transportation improvements would operate within existing roadways, sidewalks, and right-of-ways and would not result in direct physical effects to candidate, sensitive, or special status species. The proposed transportation improvements, including the Lincoln Boulevard Bridge Enhancement, would not substantially alter the existing transportation infrastructure from its current condition in such a way that could indirectly affect special status species.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant
Impact 4.2-2: With mitigation, the Proposed Project w or regional plans, policies, regulations, or by CDFW or		bstantial adverse effect on any riparian habitat or other sensitive natural communi	ty identified in loca
Construction Construction of the Lincoln Boulevard Bridge Enhancement could have an adverse effect on sensitive natural communities, such as Southern Coastal Salt Marsh, including direct alteration of habitat or hydrology by construction equipment, and release of soils or hazardous materials that could	Significant Impact – Lincoln Boulevard Bridge Replacement Less Than Significant	MM-BR-2: Special-Status Species and Habitat. See text of measure in Impact 4.2-1 above.	Less Than Significant – Lincoln Boulevard Bridge Enhancement Impact Would Remain Less Than
adversely affect water quality. Construction of the other proposed transportation improvements would occur within developed streets, sidewalks, and/or right-of-ways and would not affect any riparian habitats or sensitive natural communities.	Impact – Other Transportation Improvements		Significant – Othe Transportation Improvements
Operation The proposed transportation improvements, including the Lincoln Boulevard Bridge Enhancement, would operate within existing roadways, sidewalks, and right-of-ways and would not result in direct physical effects to riparian or other sensitive natural communities.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant

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Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation		
mpact 4.2-3: With mitigation, the Proposed Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.					
Construction  Construction activities associated with the Lincoln Boulevard Bridge Enhancement could result in discharge of dredged or fill material into federal and state jurisdictional waters. Construction of the replacement bridge could have an adverse effect on wetlands through direct alteration of habitat or hydrology by construction equipment, and release of soils or hazardous materials could adversely affect water quality.	Significant Impact – Lincoln Boulevard Bridge Replacement No Impact – Other Transportation Improvements	MM-BR-3: Wetlands and Jurisdictional Waters. For transportation improvements that may result in temporary or permanent impacts to federal and/or state jurisdictional waters or wetlands, all applicable permits shall be acquired. These permits include, but would not be limited to, Section 404 and Section 408 permits, a Section 401 Water Quality Certification, a Section 10 permit, and a Streambed Alteration Agreement.  During design of the Lincoln Boulevard Bridge Enhancement, encroachment into jurisdictional waters and wetlands shall be minimized to the greatest extent feasible. All conditions of the Section 408 permit shall be met to address the alteration of the Ballona Creek flood control channel to ensure there would be no significant changes to the pre-project hydrology in order to maintain its capacity for flood management.	Less Than Significant – Lincoln Boulevard Bridge Enhancement No Impact – Other Transportation Improvements		
		All conditions of the Section 404 permit from the USACE and Streambed Alteration Agreement from the CDFW shall be met. As part of this compliance, compensatory mitigation may be required to offset the impact related to placement of permanent fill in jurisdictional waters. The exact compensatory mitigation ratio will be determined at the time the permit is issued and would be based on the type and value of the wetlands affected by the project; agency standards typically require a minimum of 1:1 for restoration and 3:1 for construction of new wetlands. In addition, all conditions of the Wetland Mitigation and Monitoring Plan as required by USACE for federal jurisdictional waters and CDFW for state jurisdictional waters shall be met. The Wetland Mitigation and Monitoring Plan shall include 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 following completion of construction of the compensatory mitigation project.  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 and proof 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			

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
Operation The Lincoln Boulevard Bridge Enhancement would operate within existing roadways, sidewalks, and right-of-ways and would not result in direct physical effects to a federally-protected wetland.	Less Than Significant Impact	None Required	Impact Would Remain Less Than Significant
Impact 4.2-4: With mitigation, the Proposed Project w established native residents or migratory wildlife corri		substantially with the movement of any native resident or migratory fish or wild ne use of native wildlife nursery sites.	llife species, or with
Construction The Lincoln Boulevard Bridge Enhancement and/or other proposed transportation improvements have the potential to result in direct mortality or injury to migratory birds; removal or destruction of nests, nestlings, or breeding habitat; or disturbance of nesting migratory birds from construction activities during the nesting season.	Significant Impact	MM-BR-1: Migratory Birds. See text of measure in Impact 4.2-1 above.	Less Than Significant
Operation Should any permanent structures, such as piles or other support infrastructure, be required for the Lincoln Boulevard Bridge Enhancement, this is expected to occupy only a small portion of the Ballona Creek channel and would not impede the movement of wildlife or use of the wetlands as a nursery site. Other transportation improvements would operate within existing roadways, sidewalks, and right-of-ways and would not result in adverse effects on the movement of wildlife species or the use of native wildlife nursery sites.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant
4.3 Greenhouse Gas Emissions	<u></u>		
Impact 4.3-1: Implementation of the Proposed Project	would not exceed	existing or Future without Project emission levels.	
Construction Construction of the proposed transportation improvements would not require substantial grading or excavation. Use of heavy duty construction equipment would be for relatively short durations. Construction-related GHG emissions associated with the Proposed Project would be a small portion of total construction emissions estimated in the 2012-2035 RTP/SCS, which themselves are expected to represent only 0.2 percent of countywide GHG emissions in	See Combined Emissions	See Combined Emissions	See Combined Emissions

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
2035. GHG construction emissions associated with the Proposed Project are combined with operational emissions to evaluate significance. The combined emissions analysis is provided below.			
Operation The emphasis of the proposed transportation improvements on alternative modes of transportation would result in a reduction in VMT per Capita. In addition, with technological advances in vehicle emission controls, future GHG emissions with implementation of the Proposed Project would be lower than existing and Future without Project conditions. GHG operational emissions associated with the Proposed Project are combined with construction emissions to evaluate significance. The combined emissions analysis is provided below.	See Combined Emissions	See Combined Emissions	See Combined Emissions
Combined Construction and Operations Although daily VMT in the study area would be higher in the future with or without the Proposed Project, technological advances in vehicle emissions systems, projected turnover in the vehicle fleet, and future emission standards are expected to reduce the vehicle emission rates of CO <sub>2</sub> . As a result, GHG emissions with implementation of the Proposed Project would be almost 500,000 metric tons (MT) lower than existing conditions, a reduction of 34 percent, and almost 10,000 MT lower than Future without Project conditions, a reduction of approximately 1 percent.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
Impact 4.3-2: Implementation of the Proposed Project RTP/SCS.	would not imped	e attainment of SCAG's per capita GHG emission reduction targets as established in	the 2012-2035
The proposed transportation improvements would increase mobility options, increase access to alternative modes of transportation, and reduce future transportation emissions. These improvements would advance the goals of the 2012-2035 RTP/SCS. In addition, the Proposed Project would be consistent with the 2012-2035 RTP/SCS regional $\text{CO}_2$ emission reduction targets and with SB 375.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant
Impact 4.3-3: Implementation of the Proposed Project GHGs.	would not conflic	t with an applicable plan, policy or regulation adopted for the purpose of reducing	the emissions of
The Proposed Project would advance the goals of the 2012-2035 RTP/SCS, MP 2035, and Green LA Plan pertaining to GHG emissions. There would be no conflict between the goals and anticipated improvements associated with the Proposed Project and the goals, policies, targets, regulations, and requirements of these plans or the Plan for a Healthy Los Angeles.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant
4.4 Land Use and Planning			<u>'</u>
Impact 4.4-1: Implementation of the Proposed Project	would not physica	•	
Construction  Construction of the proposed transportation improvements would result in temporary, short-term disruptions to adjacent land uses. Construction would occur within or adjacent to existing transportation right-of-ways and would not isolate communities or alter the existing land use conditions in the community. Construction impacts from the Proposed Project would not divide a community or affect land use compatibility.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant
Operation Implementation of the proposed updates to the TIA fee programs would not alter future land use patterns, materially affect the feasibility of development in the CTCSP and WLA TIMP areas, adversely affect development of affordable housing, or result in any direct or indirect physical impacts that would	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
		with any applicable land use plan, policy, or regulation of an agency with jurisdictice plans, local coastal program, or zoning ordinance) adopted for the purpose of avo	
Construction Construction of the proposed transportation improvements would be temporary and of limited duration. All construction activities would comply with existing City regulations governing construction, including prohibitions on roadway construction during peak hours.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant
Operation  The Proposed Project would not conflict with applicable state, regional, or local plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The proposed list of transportation improvements and fees would support implementation of the City's adopted goals. The Proposed Project would be consistent with local and regional plans that encourage non-motorized transportation, which would result in a more sustainable transportation network and would benefit the health of residents by providing increased opportunities for bicycling and walking as well as improving air quality. The Proposed Project would be consistent with Community Plan policies aimed at improving mobility, increasing the availability of multimodal transportation infrastructure, and reducing vehicle trips in the Community Plan Areas. Overall, the Proposed Project would support existing	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant

2-19

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
and planned land uses in the Community Plan areas and would be consistent with, and supportive of, the intent of the Community Plan goals.			
4.5 Noise and Vibration			
Impact 4.5-1: Implementation of the Proposed Project ordinance, or applicable standards of other agencies.	would expose per	sons to or generate noise levels in excess of standards established in the local gene	ral plan or noise
Construction Construction activities associated with the Proposed Project could exceed ambient noise levels by 10 dBA or more for more than one day at a noise sensitive use or exceed ambient noise levels by 5 dBA or more for more than ten days over a three month period at a noise sensitive use.	Significant	MM-N-1: Construction Noise. Prior to construction, a noise control plan (NCP) shall be developed by a qualified noise specialist, as approved by the City of Los Angeles Department of Building and Safety. The NCP shall identify the procedures for predicting construction noise levels at sensitive receptors and shall describe the reduction measures required to minimize construction noise. Construction activity lasting more than one day and increasing ambient noise by more than 10 dBA or more at a noise sensitive use, or resulting in increases in ambient noise of 5 dBA or more at a noise sensitive use more than ten days in a three-month period, shall incorporate noise-reducing measures. These measures may include, but are not limited to:  Install temporary sound barriers (e.g., soundwall) between the construction site and sensitive receptors and/or place portable sound blankets around sandblasting and jackhammering operations, as well as around construction activities that involve vibratory rollers.  Equip construction equipment with the most effective locally available commercial mufflers, along with any other suitable noise attenuation devices (e.g., acoustically attenuating shields, shrouds, or enclosures). Contractor shall be responsible for maintaining equipment consistent with the manufacturers' standards to assure that no additional noise would be generated due to improperly maintained and worn parts.  Scheduling operations of high impact equipment (e.g., pile driver, vibratory roller, tractor/loader/backhoe, haul trucks) during the middle of the day so as to reduce early morning and late evening impacts when residents are likely to be home.  Placing stationary construction equipment (e.g., compressors, generators) as far away from sensitive land uses, as feasible.  Unnecessary idling of equipment and vehicles shall be prohibited. Idling of haul trucks shall be limited to five minutes or less, as required by the South Coast Air Quality Management District rules.  The public shall be kept informed of the cons	Significant and Unavoidable Impact (Temporary and Short Term)

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
		A pre-construction meeting with contractors and project managers shall be conducted to confirm that noise mitigation procedures are in place.	
Operation  Noise from increases in vehicle operations and increased vehicle speeds on some roadways during some time periods would not substantially affect	Significant Impact – Increased Bus Service	No feasible Mitigation Measures are available to address noise impacts from increased bus service	Significant and Unavoidable Impact – Increased Bus Service
overall ambient noise levels. Improvements to bus service, particularly curb-running BRT, could increase noise levels at some sensitive land uses by more than 3 dBA.	Less than Significant Impact – Other Transportation Improvements		Impact Would Remain Less Than Significant – Other Transportation Improvements
Impact 4.5-2: Implementation of the Proposed Project	would expose pe	rsons to or generate excessive groundborne vibration or groundborne noise levels.	•
Construction Vibration caused by heavy construction activities near sensitive receptors could exceed the human annoyance vibration threshold for frequent events. Vibration impacts to the nearest structures would not exceed the significance thresholds for structural vibration damage.	Significant Impact	MM-N-2: Construction Vibration. An evaluation of project-specific vibration levels shall be completed by a qualified vibration specialist, as determined by the City of Los Angeles Department of Building and Safety for any project that is less than 81 feet from a residence. Vibration reducing measures, such as use of lighter weight equipment or use of equipment that produces less vibration, shall be implemented for potentially significant vibration impacts, if technically feasible. In addition, operation of high vibration impact equipment in proximity to sensitive receptors shall be scheduled during the middle of the day so as to reduce human annoyance in the early morning and late evening when residents are likely to be home.	Significant and Unavoidable Impact (Temporary and Short Term)
Operation Operation of the Proposed Project would not involve any stationary sources of vibration. Vehicular traffic could generate vibration during operation; vibration from road traffic is near the threshold of perception for humans.	Less than Significant Impact	None Required	Impact Would Remain Less Than Significant
Impact 4.5-3: Implementation of the Proposed Project without the project. (Only applies to operations)	would result in a	substantial permanent increase in ambient noise levels in the project vicinity above	levels existing
The increased frequency of bus service associated with the Proposed Project could result in a permanent increase in ambient noise levels that would exceed 3 dBA.	Significant Impact	No Feasible Mitigation Measures Available	Significant and Unavoidable Impact
Impact 4.5-4: Implementation of the Proposed Project existing without the project. (Only applies to construct		substantial temporary or periodic increase in ambient noise levels in the project vici	inity above levels
Construction could exceed ambient noise levels by 10 dBA or more for more than one day at a noise sensitive use or by 5 dBA or more at a noise sensitive use for more than ten days over a three month period.	Significant Impact	MM-N-1: Construction Noise. See text of measure above.	Significant and Unavoidable Impact (Temporary and Short Term)

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
		here such a plan has not been adopted, within two miles of a public airport or publi ing or working in the study area to excessive noise levels.	c use airport,
Construction	Less than	None Required	Impact Would
Construction activity would not occur on airport property, and airport-related noise levels would be less than construction noise levels. Construction workers would not be exposed to excessive airport noise.	Significant Impact		Remain Less Than Significant
<u>Operation</u>	Less than	None Required	Impact Would
The Proposed Project would not expose residents to excessive airport-related noise.	Significant Impact		Remain Less Than Significant
Impact 4.5-6: For a project within the vicinity of a priva excessive noise levels. (Only applies to operations)	ate airstrip, imple	mentation of the Proposed Project would not expose people residing or working in	the study area to
There are no private airstrips located in the vicinity of the study area.	No Impact	None Required	No Impact
Impact 4.6-1: Implementation of the Proposed Project otherwise decrease the performance or safety of such		ct with adopted policies, plans, or programs regarding public transit, bicycle, or ped	lestrian facilities, or
The proposed updates of the CTCSP and WLA TIMP would be consistent with the City's multi-modal approach to transportation planning and apply such principles to the Westside in a more targeted manner. The Proposed Project would not conflict with adopted City and State policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Less than significant Impact	None Required	Impact Would Remain Less Than Significant
Impact 4.6-2: Implementation of the Proposed Project	would exceed the	resholds relating to operation of the vehicular circulation system.	
The "volume-weighted" average of the volume-to- capacity (V/C) ratio under Future with Project conditions for all of the analyzed roadway segments would exceed that of existing and Future without Project conditions. In addition, the number of roadway	Significant Impact	MM-T-1: Technology Upgrades and Intersection Improvements. As the City of Los Angeles implements projects in the updated project lists that would impact vehicular operations by resulting in the removal of a vehicular travel lane along a roadway or the removal of a through lane or turn-lane at an intersection, LADOT shall implement ITS signal and corridor upgrades, major intersection	Significant and Unavoidable Impact

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
conditions would exceed the number for existing and Future without Project conditions.		Improvements to be implemented shall be determined based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures guidelines.	
Impact 4.6-3: Implementation of the Proposed Project	would exceed the	resholds related to neighborhood traffic intrusion.	
The conversion of selected vehicle travel lanes to transit lanes or bicycle lanes would reduce the capacity available to vehicular traffic and congestion could increase on certain roadways, including neighborhood roadways.	Significant Impact	MM-T-2: Neighborhood Protection Program. As the City of Los Angeles implements projects in the updated project lists that would impact vehicular operations by resulting in the removal of a vehicular travel lane along a roadway that could potentially result in diversion of traffic to adjacent residential streets, LADOT shall implement the Neighborhood Protection Program on the impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT Traffic Study Policies and Procedures guidelines.	Significant and Unavoidable Impact
Impact 4.6-4: Implementation of the Proposed Project	would increase tl	he volume to capacity ratio on some CMP and state freeway segments by more that	2 percent.
On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. Consequently, when comparing traffic operations on the freeway system under Future with Project conditions to Existing conditions, peak period congestion would continue to increase as a result of background growth.	Significant Impact	MM-T-3: Coordination with Other Agencies on Transportation Improvements and Funding. As the City of Los Angeles implements projects in the updated project lists that could potentially impact vehicular operations as determined by LADOT on 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 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.	Significant and Unavoidable Impact
Impact 4.6-5: Implementation of the Proposed Project to maintain service.	would not requir	e the addition of a new fire station or the expansion, consolidation, or relocation of	an existing facility
The Proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.	Less than Significant	None Required	Impact Would Remain Less Than Significant
		antially disrupt existing public transit, bicycle, or pedestrian facilities or interfere wit e, or pedestrian system plans, guidelines, policies, or standards.	th planned facilities,
The Proposed Project would not disrupt any existing or planned transit, bicycle, or pedestrian facilities or create conflicts or inconsistencies with adopted transit and bicycle or pedestrian system plans, guidelines, policies, or standards.	Significant	None Required	Impact Would Remain Less Than Significant

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
Impact 4.6-7: Implementation of the Proposed Project	would not substa	ntially change physical conditions that would adversely affect transportation safety	
None of the proposed transportation system improvements would introduce new safety hazards at intersections or along roadway segments; most improvements would be designed to improve safety for all roadway users.	Less than Significant	None Required	Impact Would Remain Less Than Significant
		substantial disruption to traffic during construction, which could include temporary uses, temporary loss of an existing bus stop or rerouting of bus lines, or creation of	
Implementation of on-street improvements would mostly consist of roadway restriping and would result in limited changes to the physical configuration of curbs. Construction of the majority of the improvements would likely be short in duration, lasting up to a few weeks; other projects, including the Lincoln Boulevard Bridge Enhancement, centerrunning BRT corridors on Lincoln and Sepulveda boulevards, and I-10 Ramp Reconfiguration at Bundy Drive would require longer construction duration.	Significant Impact	MM-T-4. Traffic Control Plan. Construction activities that may result from the buildout of improvements on the proposed project lists will be evaluated on a project-by-project basis by DOT for construction-related impacts to traffic. Construction activities will be managed through the implementation of a traffic control plan, approved by DOT, to mitigate the impact of traffic disruption and to ensure the safety of all users of the affected roadway, including, as appropriate, through the use of temporary traffic signals, detours, or the use of flagmen adjacent to construction activities.	Significant and Unavoidable Impact (Temporary and Short Term)
	l metrics include N	ance metrics are currently under consideration by the State Office of Planning and F Mode Split, Transit Boardings, Vehicle Trips, and Vehicle Miles Traveled. The City of	
Mode Split: The Proposed Project would result in an overall reduction in auto mode share and an overall increase in mode shares for transit, biking, and walking.	Proposed Project would meet the intent of this potential new metric	None Required	Not Applicable
Transit Boardings: The Proposed Project would result in an overall increase in transit boardings.	Proposed Project would meet the intent of this potential new metric	None Required	Not Applicable
Vehicle Trips: The Proposed Project would result in an overall decrease in vehicle trips relative to Future without Project conditions.	Proposed Project would meet the intent of this potential new metric	None Required	Not Applicable

Environmental Impacts	Impact Determination	Mitigation Measures	Impact after Mitigation
result in an overall decrease in VMT per Capita.	Proposed Project would meet the intent of this potential new metric	None Required	Not Applicable

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