Section 4.4

Land Use and Planning

This section describes current land use and planning in the project area and analyzes potential land use and planning impacts stemming from the Proposed Project. A discussion is included based on an analysis of the potential economic impacts of an update to the Transportation Impact Assessment (TIA) fee programs in the Coastal Transportation Corridor Specific Plan (CTCSP) and West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) areas conducted by Economic & Planning Systems as part of the TIA Fee Program Study for the CTCSP and WLA TIMP Specific Plans Amendment Project (hereafter referred to as the TIA Fee Program Study), which was prepared by Fehr and Peers in October 2015 and is included as Appendix B of this EIR.

4.4.1 Introduction

This section provides an overview of existing land uses in the CTCSP and WLA TIMP project area as well as the policies and plans that govern land use and planning in the project area, specifically those policies and plans adopted for the purpose of avoiding or mitigating an environmental effect. The compatibility of the Proposed Project with surrounding land uses, and the Proposed Project's concurrence with land use plans and policies is analyzed, potential impacts are described, and, where necessary, mitigation measures are recommended.

The section is organized as follows:

- **Regulatory Framework** provides an overview of state, regional, and local laws and guidelines relative to land use and planning, including the land use and planning goals, objectives, and policies applicable to the project area.
- **Existing Setting** provides a summary and overview of land use conditions in the project area.
- **Methodology** describes the approach used for analyzing the significance of potential impacts to land use and planning from implementation of the Proposed Project.
- **Thresholds of Significance** lists the thresholds used in identifying significant impacts as defined in Appendix G of the State CEQA Guidelines and the L.A. CEQA Thresholds Guide.
- Impacts and Mitigation Measures discusses the effects of implementation of the Proposed Project on existing land uses and the Proposed Project's consistency with relevant and applicable plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect. Mitigation measures are identified as necessary and feasible to reduce significant impacts. The Significance of Impacts After Mitigation discussion identifies residual impacts after application of mitigation measures.

4.4.2 Regulatory Framework

4.4.2.1 Federal

There are no federal plans, policies, or regulations related to land use and planning that apply to the Proposed Project for the purpose of determining land use and planning impacts.

4.4.2.2 State

State California Complete Streets Act

In 2008, the California Department of Transportation (Caltrans) enacted the California Complete Streets Act (Assembly Bill [AB] 1358). The legislation requires cities to identify how they will provide for the routine accommodation of all users of the roadway, including motorists, pedestrians, bicyclists, individuals with disabilities, seniors, and users of public transportation. This legislation requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to the plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan and, in doing so, to consider how appropriate accommodation varies depending on its transportation and land use context. Users of streets, roads, and highways have been defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation.

California Coastal Act

In 1972 in California, the Coastal Zone Conservation Act (Proposition 20) was approved, which prohibited development 1,000 yards inland from California's mean high tide line (MHTL) without a permit from a regional or state coastal commission. By 1976, a statewide plan for coastal protection was developed, leading to the passage of the California Coastal Act (Coastal Act) (Public Resource Code [PRC] Section 30000 et seq.).

The Coastal Act was enacted to establish policies and guidelines that provide direction for the conservation and development of the California coastline. With the creation of the California Coastal Commission, the Coastal Act created a state and local government partnership to ensure that public concerns regarding coastal development are addressed. The California Coastal Commission is charged with protecting regional, state, and national interests in assuring the maintenance of the long-term productivity and economic vitality of coastal resources necessary for the well-being of the people of the state; avoiding long-term costs to the public and a diminished quality of life resulting from the misuse of coastal resources; and providing continued state coastal planning and management through the state coastal commission (PRC Section 30004).

The Coastal Act requires all cities and counties along the California coast to prepare a local coastal program (LCP) for the portion of their jurisdiction that falls within the coastal zone. The LCP must reflect the coastal issues and concerns of its specific area, and be consistent with the overall statewide goals, objectives, and policies of the Coastal Act. An LCP typically consists of a land use plan and an implementation plan (coastal zoning ordinance). The land use plan provides the general kinds, locations, and intensity of land uses; the applicable resource protection and development policies; and, where necessary, a listing of implementing actions. The implementation plan consists of the zoning ordinances and zoning district maps to implement the land use plan.

Following the certification of an LCP, regulatory responsibility is delegated to the local jurisdiction, although the California Coastal Commission (CCC) retains jurisdiction (i.e., permit authority) over the immediate shoreline (e.g., submerged lands, tidelands, and public trust lands) (Section 30519(b) of the Coastal Act). The CCC has appellate authority over development approved by local governments in specified geographic areas and for major public works projects and major energy facilities. In authorizing Coastal Development Permits (CDPs), the local government must make the finding that the development conforms to the certified LCP.

Local actions on applications for Coastal Act authority to conduct certain types of development and development within certain geographic areas may be appealed to the CCC. Appeal jurisdiction is retained, for example, on lands within 100 feet of streams or wetlands; lands subject to the public trust that are no longer within the Commission's retained jurisdiction; lands within 300 feet of coastal bluffs, beaches, or estuaries; and lands between the sea and the first public road paralleling the sea.

In the City of Los Angeles, there are currently no fully certified LCPs. The majority of the Venice Community Plan area is in the Venice Coastal Zone. The Venice LCP is described in more detail in Section 4.4.2.4 below. **Figure 4.4-1** shows the coastal zone boundaries in the project area, the location of the Venice LCP area, and the key components of the CTCSP and WLA TIMP proposed lists of transportation improvements that would extend into the coastal zone.

Senate Bill 743

Two other laws, the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375) and the Global Warming Solutions Act of 2006 (AB 32), form the backdrop to SB 743. Through the enactment of the Sustainable Communities and Climate Protection Act of 2008, California signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled and contribute to the reduction of GHG emissions. As described above, the California Complete Streets Act also prioritizes integrated transportation decision making with its focus on planning for balanced, multimodal transportation networks that meet the needs of all users.

A key provision of SB 743 is the elimination of the measurement of auto delay, including Level of Service, as a metric used for measuring traffic impacts in transit priority areas. ²² The statute provides that, upon certification and adoption of the revised CEQA Guidelines by the Secretary of the Natural Resources Agency, "automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" pursuant to CEQA. In other words, LOS generally shall not be used as a significance threshold under CEQA. The purpose of this is to establish criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the "…reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also allows the Office of Planning and Research (OPR) to develop alternative metrics outside of transit priority areas. Potential metrics could include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, or automobile trip generation rates. The alternative criteria and metrics have not yet been adopted by OPR. For additional discussion of SB 743, see Section 4.6, *Transportation*.

4.4.2.3 Regional

South California Association of Governments

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) presents the transportation and overall land use vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties

A "transit priority area" is defined in as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in Section 21064.3 of the California Public Resources Code as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

(SCAG, 2012). The RTP portion of the 2012-2035 RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area. The SCS portion of the 2012-2035 RTP/SCS presents an overall land use concept for the region with increasing focus on densification of urban areas and development around transit stations, as well as increased focus on use of transit and active transportation. The goals of the 2012-2035 RTP/SCS are identified in **Table 4.4-1** below.

Table 4.4-1 SCAG 2012-2035 RTP/SCS Regional Goals

RTC/SCS Goals		
Align the plan investments and policies with improving regional economic development and competitiveness		
Maximize mobility and accessibility for all people and goods in the region		
Ensure travel safety and reliability for all people and goods in the region		
Preserve and ensure a sustainable regional transportation system		
Maximize the productivity of our transportation system		
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)		
Actively encourage and create incentives for energy efficiency, where possible		
Encourage land use and growth patterns that facilitate transit and non-motorized transportation		
Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies		
Source: SCAG, 2012.		

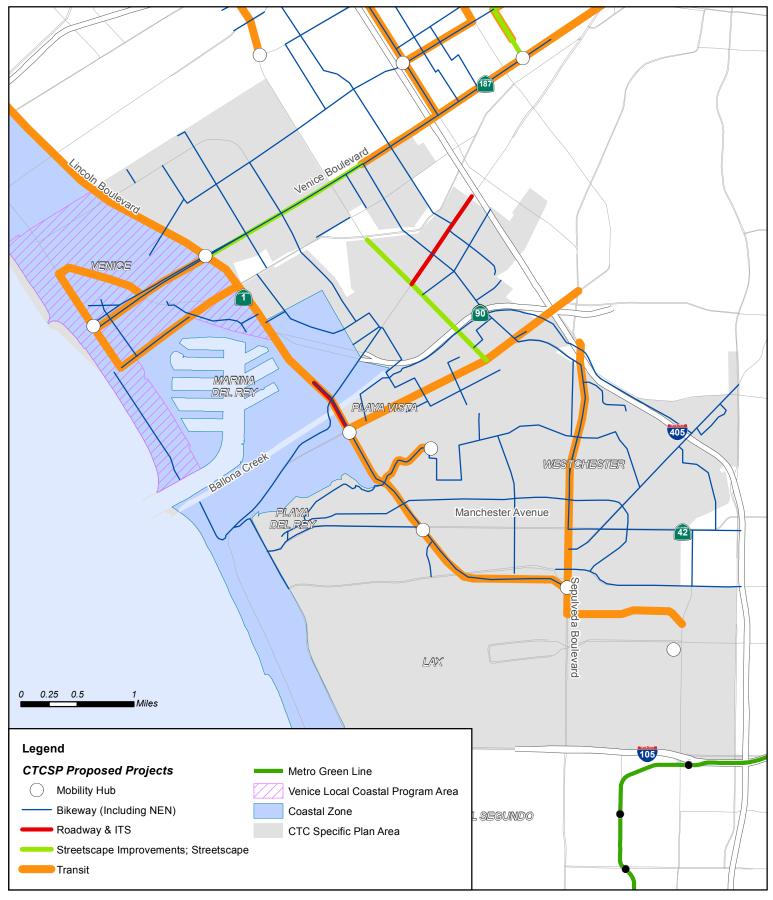
Source: SCAG, 2012.

4.4.2.4 Local

City of Los Angeles General Plan Framework Element

The General Plan Framework Element, one of the ten elements of the General Plan for the City of Los Angeles, was adopted in 1996 (and readopted in 2001; City of Los Angeles, 2001a). It is a discretionary element of the General Plan which looks to the future. The Framework Element establishes the broad overall policy and direction for the entire General Plan and provides the longrange strategy to guide the comprehensive update of the General Plan's other elements -- including the Community Plans which collectively comprise the Land Use Element. The Framework Element also provides guidance for the preparation of related General Plan implementation measures including Specific Plans, ordinances, or programs, including the Capital Improvements Program.

While all adopted General Plan elements have equal status and no element may be made subordinate to another, the Framework Element is a special purpose element which serves as the General Plan's "umbrella document." The Framework Element sets forth a conceptual relationship between land use and transportation on a citywide basis whereby lower density neighborhoods are preserved and new density, if it occurs, is directed to areas served by adequate transportation infrastructure. This element provides the vision necessary to bring cohesion to the City's overall General Plan and the direction by which the citywide elements and the community plans shall be comprehensively updated in harmony with that vision. It establishes the standards, goals, policies, objectives, programs, terms, definitions, and direction to guide these updates.



Source: California Coastal Commission, 2003

Figure 4.4-1 Coastal Zone in the CTCSP Area



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The Framework Element describes a vision for transportation in the City that is fully integrated, multimodal, provides multiple travel choices, and increases accessibility. As described in the Framework Element, this transportation vision can only be achieved through a comprehensive strategy of physical and operational improvements and behavioral changes that reduce the number and length of trips generated. The Framework Element points to rail and bus improvement, transportation system management, trip reduction, and mode shift strategies to fulfill its transportation vision. It envisions that greater choice and accessibility, made possible by new, multimodal facilities and services as well as improved access to key transportation facilities, will enhance the many economic resources of the City, improve the environments where people live and work, and support greater equity.

City of Los Angeles Mobility Plan

In August 2015, the City adopted a revised Transportation Element of the City's General Plan, referred to as Mobility Plan 2035 or MP 2035 (City of Los Angeles, 2015a). The revised element reflects updated policies and programs that renew the policy foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City, including the Westside. MP 2035 is in compliance with the 2008 Complete Streets Act (AB 1358), which mandates that the circulation element of a city's general plan must 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. MP 2035 is also consistent with SB 743.

MP 2035 includes the following overall five goals that define the City's mobility priorities:

- Safety First: focuses on topics related to crashes, speed, protection, security, safety, education, and enforcement.
- World Class Infrastructure: focuses on topics related to the Complete Streets Network (walking, bicycling, transit, vehicles, green streets, goods movement), Great Streets, Bridges, Street Design Manual, and demand management.
- Access for all Angelenos: focuses on topics related to affordability, least cost transportation, land use, operations, reliability, demand management, and community connections.
- Collaboration, Communication & Informed Choices: focuses on topics related to real-time information, open source data, transparency, monitoring, reporting, emergency response, departmental and agency cooperation and data base management.
- **Clean Environment and Healthy Communities:** focuses on topics related to environment, health, clean air, clean fuels and fleets, and open street events

To address these multimodal priorities, MP 2035 includes pedestrian, neighborhood, bicycle, transit, and vehicle enhancements to improve mobility and create a more pedestrian friendly atmosphere throughout the City. These improvements include enhanced connections throughout the City through the establishment of networks and districts where specific multi-modal transportation enhancement projects are planned to take place:

Pedestrian Enhanced Districts: Areas where pedestrian improvements will be made.
 Pedestrian enhancements include way-finding, street trees, pedestrian-scaled street lighting,

and enhanced crosswalks at all legs of the intersection, automatic pedestrian signals, reduced crossing lengths, wider sidewalks, and specialty paving and seating areas where special maintenance funding exists.

- Neighborhood Enhanced Network: Areas that provide a network of slow, locally serving streets that connect communities to schools, retail, parks and open space, health care and employment opportunities. Streets on the Neighborhood Enhanced Network are typically local and/or collector streets with one lane in each direction that are enhanced with street calming techniques that can include, but are not limited to: bump outs, round-a-bouts, ample sidewalks, and street trees. Neighborhood Enhanced Network streets are intended to provide a safe and convenient place to walk, roll, skate, scooter, bike, and stroll. Some streets (or street segments) on the Neighborhood Enhanced Network may already provide a quality pedestrian and bicycle experience and will require little, if any, improvements. Others may require the addition of a signalized crosswalk to assist non-motorized users to cross a fast moving arterial street.
- Transit Enhanced Network: The purpose of the Transit Enhanced Network is to improve existing and future bus service on a select group of arterial streets by prioritizing improvements for transit riders relative to improvements for other roadway users. The aim of transitenhanced streets is to provide reliable and frequent transit service that is convenient and safe, increase transit mode share, reduce single-occupancy vehicle trips, and integrate transit infrastructure investments with the identity of the surrounding street. The transit technology will primarily be high-capacity buses. Bus service will be improved with infrastructure improvements in the right-of-way, signal timing and technology improvements, and stop enhancements.
- Bicycle Enhanced Network: The intent of the Bicycle Enhanced Network is to provide safe, convenient, and comfortable local and regional bicycle facilities for people of all types and abilities. The Bicycle Enhanced Network is comprised of a low-stress network of bikeways, including protected bicycle lanes and bicycle paths that will provide additional separation or protection from mixed traffic. The key linkages of streets will receive treatments beyond a striped bicycle lane or shared lane marking, including buffered lanes, cycle tracks, and intersection enhancements. Planned improvements will support a greater mode shift from vehicles to bicycles throughout the City and will complement all uses, allowing short (and longer) trips to be made via bicycle on a safe and fully connected network throughout the City and to adjacent jurisdictions with their own bicycle paths.
- Vehicle Enhanced Network: The Vehicle Enhanced Network recognizes the need to accommodate regional traffic to and from freeways on City streets. The Vehicle Enhanced Network identifies corridors that will remain critical to vehicular circulation and to balance regional and local circulation needs. The overall intent of the Vehicle Enhanced Network is to provide streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times. Enhancements include investments in intelligent transportation systems, access management and consolidation, parking restrictions and removal, improved signal timing, and turning restrictions.

City of Los Angeles Community Plans

The City of Los Angeles General Plan includes 35 community plans that collectively comprise the Land Use Element of the General Plan. The project area is made of the Los Angeles International Airport (LAX) Plan and all or a portion of the following community plans: Westchester-Playa Del Rey, Palms-

Mar Vista-Del Rey, Venice, West Los Angeles, Westwood, and Brentwood-Pacific Palisades. The community plan areas are shown in **Figure 4.4-2** and **Figure 4.4-3**. The Community Plans depict a range of allowable land uses, which are unique to the City's many communities. The Community Plans are intended to promote an arrangement of land uses, streets, and services which encourage and contribute to the economic, social, and physical health, and enhance the safety, welfare, and convenience, of the people who live and work in the City of Los Angeles.

Each of the plans includes aspirational goals, objectives, and policies related to improving the character and quality of life within the community. Among these are goals, objectives, and policies that specifically address transportation. Within the context of the Los Angeles City General Plan, a goal is a direction setter; it is an ideal future condition related to public health, safety or general welfare toward which planning implementation is measured. An objective is a specific end that is an achievable intermediate step toward achieving a goal. A policy is a statement that guides decision making, based on the plan's goals and objectives (City of Los Angeles, 2001a). The specific objectives and policies within each of the Community Plans in the CTCSP and WLA TIMP planning area may vary to some extent as they may be tailored to address the unique needs of each community. However, aside from the LAX Plan which has aviation specific goals, the Community Plans in the study area share common transportation goals. These common Community Plan transportation goals include increasing multimodal transportation opportunities; reducing vehicle trips and traffic congestion; creating safe, efficient and attractive bicycle, pedestrian, and roadway networks; and providing a circulation system that supports existing and planned land uses. As described in further detail above, the City recently adopted an updated Transportation Element to the General Plan (MP 2035). MP 2035 reflects the City's updated transportation goals, objectives, and policies. Individual Community Plan transportation objectives and policies will be updated to reflect the City's latest strategies for achieving mobility goals (see Appendix H, Updated Community Plan Text).

City of Los Angeles Specific Plans

The project area encompasses numerous Specific Plan boundaries. Specific Plans are established to provide additional regulatory controls and general procedures and policies for development in specific geographical areas. Some of the Specific Plans listed below are focused on land use and zoning issues, such as density and land use restrictions, and others establish guidelines and policies related development and land planning, which may include policies related to street design and engineering, transportation demand management, and parking.

Following a brief description of the Specific Plans within the project area:

LAX Plan Area

- Los Angeles Airport/El Segundo Dunes Specific Plan: This plan relates to the protection of the Dunes Habitat Preserve (City of Los Angeles, 1992a).
- LAX Specific Plan: This plan provides regulatory controls and procedures for the development of infrastructure at LAX consistent with the LAX Plan, including airside and landside land uses, transportation, and parking within the airport boundaries (City of Los Angeles, 2005).
- LAX Northside Plan Update: This plan area covers approximately 340 acres just north of LAX. The plan consists of the LAX Northside Design Guidelines and Standards as well as a Tract Map and is intended to create a vibrant, sustainable center of employment, retail,

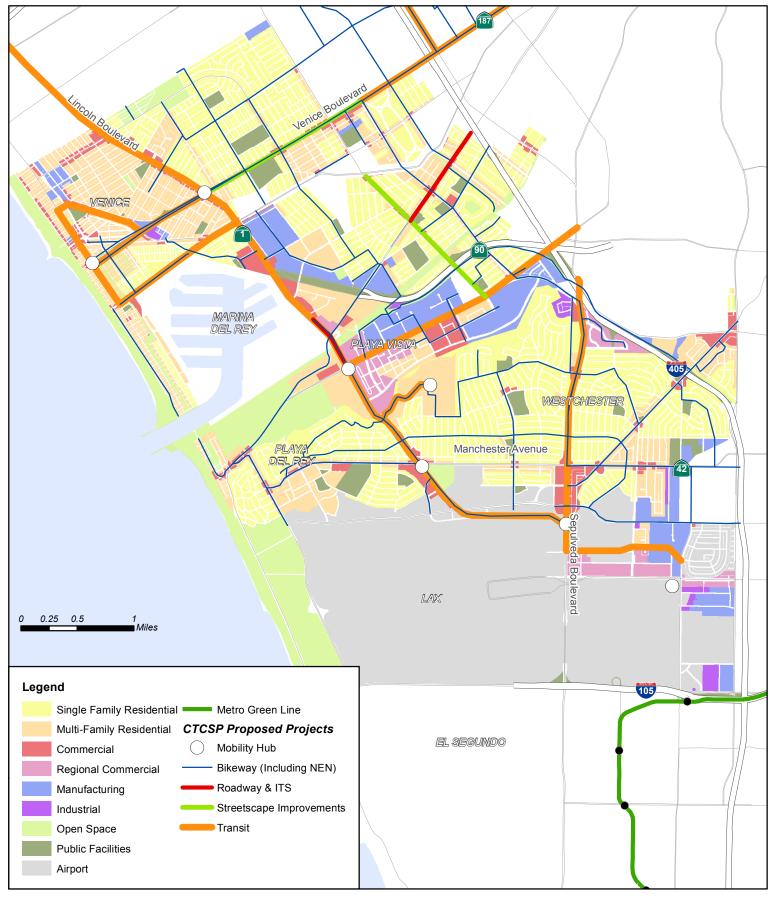
restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and Los Angeles World Airports, the City of Los Angeles department that manages LAX. The plan enables the development of up to 2,320,000 square feet of new development and would permit areas for recreation, open space, and buffer space. Although it is not a Specific Plan, the Design Guidelines and Standards establish regulations governing future development occurring within the LAX Northside sub-area of the LAX Specific Plan area (City of Los Angeles, 2015b).

Westchester-Playa Del Rey Community Plan Area

- Playa Vista Area B Specific Plan: This plan identifies land use regulations for the Playa Vista Area B area (City of Los Angeles, 1985a). The purpose of plan includes establishing a Local Coastal Program for the area within the coastal zone, protecting and enhancing the coastal zone environment, and assuring that maximum public access to the coast and public recreation area is provided. The plan includes standards aimed at facilitating the safe, efficient flow of traffic. Development within this area is required to comply with the provisions of the CTCSP.
- Playa Vista Area D Specific Plan: This plan identifies land use regulations for the Playa Vista Area D area (City of Los Angeles, 1985b). The purpose of the plan is to designate standards to regulate land uses, density, building heights, architectural and landscape treatment, signs, and vehicular and pedestrian circulation. Development within this area is required to comply with the provisions of the CTCSP.
- Coastal Bluffs Specific Plan: This plan is aimed at protecting, maintaining, enhancing and, where feasible, restoring the quality of the coastal environment, and assuring that maximum public access to the coast and public recreation area is provided (City of Los Angeles, 1994).
- Los Angeles Airport/El Segundo Dunes Specific Plan: This plan is described above under the LAX Plan Area.

Palms-Mar Vista-Del Rey Community Plan Area

- Glencoe/Maxella Specific Plan: This Specific Plan was adopted to guide future development, protect industrial land uses, and protect adjacent residential neighborhoods from development within the area (City of Los Angeles, 1993). The plan specifies transportation improvements if a development threshold is met at a property fronting Glencoe Avenue, Maxella Avenue between Glencoe and Redwood Avenues, Redwood Avenue, Beach Avenue or Del Rey Avenue. Development within this Specific Plan area is required to comply with the provisions of the CTCSP.
- Playa Vista Area C Specific Plan: This plan identifies land use regulations for the Playa Vista Area C area (City of Los Angeles, 1985c). The purpose of the plan includes establishing a Local Coastal Program for the area within the coastal zone, protecting and enhancing the coastal zone environment, and assuring that maximum public access to the coast and public recreation area is provided. The plan also includes standards aimed at facilitating the safe and efficient flow of traffic. Development within this area is required to comply with the provisions of the CTCSP.

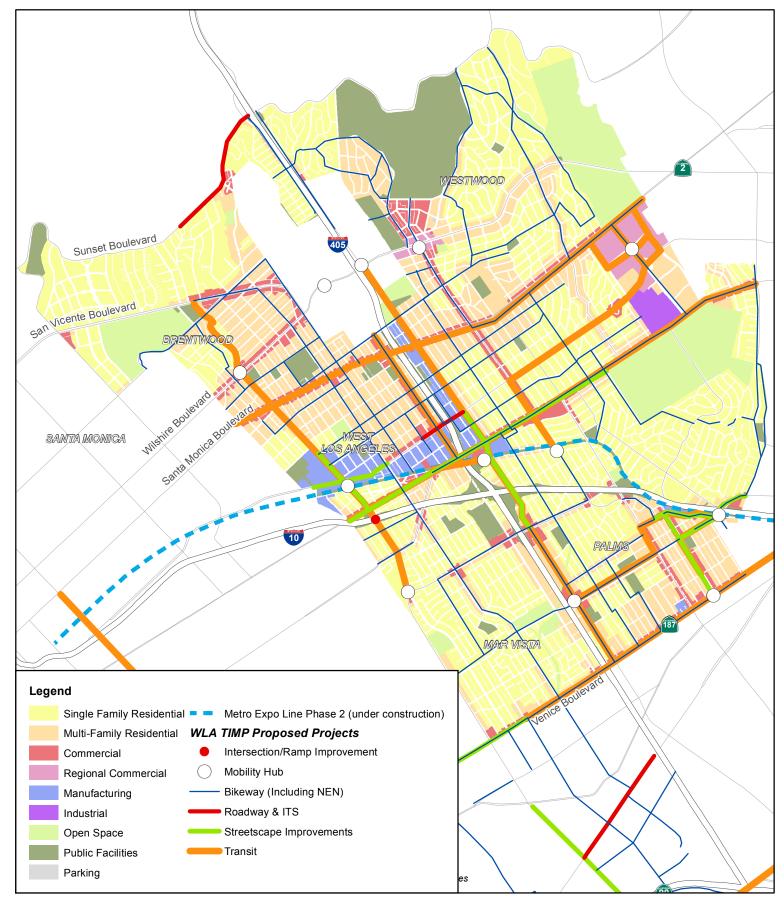


Source: City of Los Angeles Department of City Planning, 2015

Figure 4.4-2 Existing Land Use in the CTCSP Area



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Source: City of Los Angeles Department of City Planning, 2015

Figure 4.4-3 Existing Land Use in the WLA TIMP Area



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Venice Community Plan Area

- Oxford Triangle Specific Plan: This plan was established and adopted to guide development within the Oxford Triangle area and encourage mixed-use development that creates a lively urban environment (City of Los Angeles, 1987). The plan includes transportation and traffic standards, including limits on vehicular access from buildings or structures on Lincoln Boulevard. Development within this Specific Plan area is required to comply with the provisions of the CTCSP.
- Glencoe/Maxella Specific Plan: This plan is described above under the Palms-Mar Vista-Del Rey Community Plan area.

West Los Angeles Community Plan Area

- Century City South Specific Plan: This plan establishes regulations for the development of land within the Specific Plan area, including providing street capacity adequate for the intensity and design of development by establishing general procedures for the phasing of development within the Specific Plan area (City of Los Angeles, 1981a). There are requirements for trip cap monitoring and travel demand management (TDM) when a specified development threshold is met for certain developments within the Specific Plan area
- Century City North Specific Plan: This plan establishes standards and regulations for the
 development of the Specific Plan area, including providing street capacity adequate for the
 intensity and design of development by establishing phases for construction within the
 Specific Plan Area and providing for installation of a continuous Pedestrian Corridor,
 consisting of pedestrian walkways and crossings (City of Los Angeles, 1981b).
- Sepulveda Corridor Specific Plan: This plan establishes regulations for the development of land within the Specific Plan area, including redevelopment that supports street improvements, and the provision of adequate off-street parking and freight loading facilities (City of Los Angeles, 1992b).

Westwood Community Plan Area

- Westwood Village Specific Plan: This plan establishes standards and regulations for the
 mixed use development of the Westwood Village (City of Los Angeles, 1989). Provisions
 include encouraging streetscape improvements and additional public parking, encouraging
 non-automobile access by facilitating pedestrian and shuttle access, providing sufficient
 parking, developing programs to encourage carpooling, and providing off-street parking
 spaces for bicycles.
- Westwood Community Design Review Board: This specific plan establishes the Westwood Community Design Review Board (City of Los Angeles, 1988a).
- Westwood Community Multi-Family Specific Plan: This specific plan establishes
 development and design standards for multiple-family residential development in specified
 portions of the Westwood Community Plan Area (City of Los Angeles, 1988b).

- North Westwood Village Specific Plan: This plan guides development within the North Westwood Village Specific Plan Area to ensure development takes place in accordance with the Westwood Community Plan (City of Los Angeles, 1999a). Regulations in the Specific Plan pertain to building massing and design as well as architectural character and environmental setting (City of Los Angeles, 1988c). The plan also provides the guidelines and processes for the review and approval of the design of buildings proposed for construction within the area.
- Wilshire-Westwood Scenic Corridor Specific Plan: This plan establishes development standards aimed at minimizing traffic and parking problems along Wilshire Boulevard, enhancing the aesthetic qualities of the Specific Plan area, encouraging more open space, reducing the impact of high-density residential development, and reducing the impact of shadows caused by high-rise buildings (City of Los Angeles, 1981c).

Brentwood-Pacific Palisades Community Plan Area

San Vicente Scenic Corridor Specific Plan: This plan establishes design and development standards to maintain the existing character of San Vicente Boulevard, including preserving and enhancing the landscaped median strip, and assuring that commercial signage along the boulevard appropriately scaled and placed so as not to dominate the existing streetscape (City of Los Angeles, 1980).

Venice Local Coastal Program

The California Coastal Act of 1976 directs local governments within the coastal zone to prepare LCPs for those areas located in the State's designated Coastal Zone. A majority of the Venice Community Plan is in the State's Coastal Zone. However, a Local Coastal Program has not yet been certified for the Venice Coastal Zone. Figure 4.4-1 shows the location and extent of the Venice Coastal Zone. The area is generally bounded by Marine Street on the north; the City-County boundary, Washington Boulevard and Via Marina on the south; Lincoln Boulevard and Via Dolce on the east; and the Pacific Ocean on the west. A certified LCP consists of the City's land use plans, zoning ordinances and maps, and the other implementing actions which implement the provisions and policies the California Coastal Act. An LCP contains the Land Use Plan (LUP) and a Local Implementation Plan (LIP). The LUP includes the kinds, locations, and intensity of land uses; the applicable resources protection and development policies; and a listing of implementing actions. The LIP is comprised of a Specific Plan, related implementing ordinances, and a zoning map. The LIP implements the LUP with specific zoning designations and development standards for all uses within the Venice Coastal Zone (City of Los Angeles, 2001b).

Westwood/Pico Neighborhood Overlay District

The Westwood/Pico Neighborhood Overlay District was established by Ordinance No. 171,859. The District was established to regulate portions of Westwood Boulevard, Pico Boulevard, and Overland Avenue, which have a variety of commercial uses and activities. Portions of these streets are occupied with structures of a similar size and with architectural details such as the location of windows, building walls, and pedestrian entrances which, if preserved and enhanced, would encourage people in the surrounding neighborhoods to walk and shop along these streets.

The following pedestrian-oriented streets have been identified as part of the Westwood/Pico Neighborhood Oriented District: Westwood Boulevard (both sides of Westwood Boulevard between Missouri Avenue and the alley northerly of Pico Boulevard); Pico Boulevard (the north side of Pico Boulevard between Bentley Avenue and Patricia Avenue; and the south side of Pico Boulevard

between Military Avenue and Patricia Avenue); and Overland Avenue (the east side of Overland Avenue between Blythe Avenue and the alley south of Pico Boulevard).

City of Los Angeles Great Streets Initiative

Mayor Eric Garcetti enacted the Great Streets Initiative in October 2013 to activate public spaces, provide economic revitalization, increase public safety, enhance local culture, and support neighborhoods (City of Los Angeles, 2015c). The Great Street projects will add bike racks, medians, plazas, sidewalk repairs, bus stops, pocket parks, crosswalks, and other improvements aimed at attracting pedestrians and new businesses.

Two segments of the Great Streets Initiative are located in the project area: Venice Boulevard between Beethoven Street and Inglewood Boulevard, and Westwood Boulevard between Le Conte Avenue and Wilshire Boulevard (City of Los Angeles, 2015c).

- **Venice Boulevard between Beethoven Street and Inglewood Boulevard:** Great Streets will enhance the community's infrastructure and help create an even more accessible pedestrian and bicycle environment.
- Westwood Boulevard between Le Conte Avenue and Wilshire Boulevard: Great Streets will
 partner with the Westwood Village Improvement Association and other community partners to
 support efforts to maximize community access, reduce commercial vacancies, and improve
 parking management in Westwood Village.

4.4.3 Existing Setting

The project area is in the western portion of the City of Los Angeles (the "Westside") and encompasses the CTCSP area and the WLA TIMP area. 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.

Figure 4.4-2 and Figure 4.4-3 show the general types of land uses in the CTCSP and WLA TIMP project areas, the location of Community Plan areas, and the location of key components of the proposed transportation improvements for each of the Specific Plan areas.

As shown in the figures, the project area is an urban area that is built out with a variety of land uses, including residential, commercial, and industrial uses, with some areas of open space/public parks. The most prevalent land use within the project area (as measured by percent of land area consumed) is low-density residential (single-family development), representing approximately 35 percent of total land area, concentrated primarily in the Brentwood-Pacific Palisades, Palms-Mar Vista, and Westchester-Playa del Rey areas.

The project area has a larger percentage of high-density (multi-family development) residential than urban Los Angeles County (14 percent versus approximately 10 percent), with high-density housing clusters in Playa Vista, Venice, Palms, West Los Angeles, and Westwood areas.

Commercial uses are also prevalent (14 percent compared to 7 percent for Urban Los Angeles County), with areas of concentration within the project area in Westchester, Playa Vista, and Westwood.

Below is a description of the types of land uses by Community Plan area. The locations of the Community Plan areas are shown in Figure 3-1 in Chapter 3, *Project Description*.

4.4.3.1 Los Angeles International Airport

The LAX Plan area is located in the southwest portion of the CTCSP area (City of Los Angeles, 2004a). It is generally bounded by Imperial Highway/ Interstate 105 (I-105) on the south; Vista Del Mar on the west; Westchester Parkway on the north; and La Cienega Boulevard on the east. Pershing Drive runs in a north-south direction along the western part of the plan area. The land east of Pershing Drive is identified in the LAX Plan as Airport use, with the exception of a small portion of land designed as the Belford Special Study Area (City of Los Angeles, 2013a). A generalized land use map for the LAX area identifies the airport as Industrial; the area that is a Special Study Area on the LAX Plan map (i.e., east of Airport Boulevard between Westchester Parkway and 96th Street) has a designation of Residential Multi Family and Commercial (City of Los Angeles, 2013a). A small area along I-105 from Sepulveda Boulevard to Aviation Boulevard is designated as Public Facilities.

4.4.3.2 Westchester-Playa Del Rey

Westchester-Playa Del Rey comprises a majority of the CTCSP area, stretching west to east from the coast to I-405 (City of Los Angeles, 2004b). The majority of the Community Plan lies to the north of LAX; however, the Community Plan Area also includes the non-airport land to the west, east, and south of LAX. This area is bounded Jefferson Boulevard/Centinela Avenue on the north, LAX and Imperial Highway on the south, the Pacific Ocean on the west, and La Cienega Boulevard, LAX, and the City of Inglewood on the east. The westernmost portion of the plan area is comprised of Open Space (i.e., LAX/El Segundo Dunes). From Culver Boulevard inland to near Osage Avenue, the land use is a mixture of single family residential, multi-family residential, commercial, and open space. The majority of land from Lincoln Boulevard east to La Tijera Boulevard is single family residential. In the north along Jefferson Boulevard, and in the east along Century Boulevard, there is a majority of commercial and industrial land uses (City of Los Angeles, 2013b).

4.4.3.3 Palms-Mar Vista-Del Rey

The Palms-Mar Vista-Del Rey plan area makes up part of both the CTCSP area and the WLA TIMP area. The southern part of the Palms-Mar Vista-Del Rey plan area makes up part of the central portion of the CTCSP area (north of Marina Del Rey) and the northern part of the Palms-Mar Vista-Del Rey plan area comprises the southern part of the WLA TIMP area (stretching south to north from approximately Venice Boulevard to Pico Boulevard and west to east from Walgrove Avenue to Clarington Avenue). The majority of land use throughout this plan area is single family residential. Areas of multi-family residential and commercial are located in the northeast, west, and southwest. Open space and public facilities uses are located throughout the plan area. Industrial uses are fairly centralized in the south/southwest (City of Los Angeles, 2007).

²³ The LAX Plan Special Study Area is an airport acquisition area; most of the former land uses have been demolished.

4.4.3.4 Venice

The entire Venice Community Plan Area is within the CTCSP area. Venice spans west to east from the coast to approximately Walgrove Avenue and north to south from just north of Rose Avenue to Via Marina and the entrance to Marina Del Rey. The majority of land use in Venice from north of Rose Avenue to Via Marina is multi-family residential. Areas of open space are located along the coast, near Main Street and Abbot Kinney Boulevard, south of Venice Boulevard near Walgrove Avenue, and along Rose Avenue to the north and south of Penmar Avenue. Commercial uses are clustered around Lincoln Boulevard, Abbot Kinney Boulevard, Washington Boulevard, Pacific Avenue, Main Street, and Rose Avenue between 4th Avenue and Lincoln Boulevard (City of Los Angeles, 2001b).

4.4.3.5 West Los Angeles

Similar to Venice, almost the entire West Los Angeles Community Plan Area is encompassed within the WLA TIMP area (City of Los Angeles, 1999b). Land uses in the north and northeast are largely multi-family residential, commercial, public facilities, and industrial. The western side of the area is largely single family residential with some areas of commercial and multi-family residential along Pico Boulevard and National Boulevard. Additionally, Hillcrest Country Club and Cheviot Hills Park are located south of Pico Boulevard between Patricia Avenue on the west and Roxbury Drive on the north (City of Los Angeles, 2013c).

4.4.3.6 Westwood

The Westwood Community Plan Area comprises the northeastern section of the WLA TIMP area. The main land uses in the north, central, and eastern parts of the Community Plan Area are single family residential, public facilities, and open space. Areas of multi-family residential are located along the western and southern boundaries of the plan area along Sepulveda and Santa Monica Boulevards, respectively. The main commercial areas are located along Westwood Boulevard, along Wilshire Boulevard between Sepulveda Boulevard and Glendon Avenue, and in Westwood Village (City of Los Angeles, 2010).

4.4.3.7 Brentwood-Pacific Palisades

The southeastern part of the Brentwood-Pacific Palisades Community Plan Area comprises the northwestern corner of the WLA TIMP area (City of Los Angeles, 1998). Land use in this area is a mixture of single family residential throughout the northern and central portions, and open space, commercial, and multi-family residential in the western and southern portions (City of Los Angeles, 2006a).

4.4.4 Methodology

The land use and planning analysis identifies existing land uses generally in the vicinity of the proposed transportation improvements, and describes applicable land use plans and policies. This analysis fulfills the requirements of State CEQA Guidelines Section 15125(d) that an EIR discuss any inconsistencies between a proposed project and applicable general plans and regional plans, specifically plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. The analysis also describes the potential for changes in land use to occur as a result of the Proposed Project.

4.4.4.1 Methodology for Determining Consistency with Applicable Plans, Policies and Regulations

The Proposed Project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable land use plans. The focus of this analysis is on plans, and policies within those plans, adopted for the purpose of avoiding or mitigating an environmental effect. A given project need not be in perfect conformity with each and every policy, nor does state law require precise conformity of a proposed project with every policy or land use designation for a site. A project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts (as defined by State CEQA Guidelines Section 15382). Under this approach, a policy conflict is not, in and of itself, considered to be a significant environmental impact. An inconsistency between a proposed project and an applicable plan is a policy determination that may or may not indicate the likelihood of environmental impact.

Land use goals, policies, and development standards that apply to the CTCSP area and WLA TIMP area were analyzed with respect to the proposed amendments to the lists of transportation improvements to determine consistency. As stated above, the emphasis of this analysis is on plan consistency and potential conflicts between the Proposed Project and existing land use plans, policies, and regulations adopted to avoid or mitigate environmental effects. The consistency analysis was prepared in compliance with State CEQA Guidelines Section 15125(d). Neither CEQA nor the State CEQA Guidelines set forth standards for determining when a project is inconsistent with an applicable plan; rather, 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.

Courts have recognized that general and specific plans attempt to balance a range of competing interests. It follows that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. If the Proposed Project is determined to be inconsistent with specific individual objectives or policies of an applicable plan, but is largely consistent with the land use or the other goals and policies of that plan and would not preclude the attainment of the primary intent of the land use plan, the project is not considered to be inconsistent with the plan. Furthermore, any such inconsistency would also have to result in a physical change in the environment, not analyzed in the other resource chapters of this EIR, to result in a significant environmental impact. The analyses below provide an overview of the relevant policies and development standards from various federal, state, regional, and local policy and planning documents applicable to the project area.

4.4.4.2 Indirect Effects

The Proposed Project itself would not involve any construction or changes in land use and would not result in direct impacts to land use and planning. However, the analysis addresses whether the Proposed Project's TIA fees updates or list of transportation improvements could result in indirect changes in land use by altering the types of land uses that are developed within the project area. An example of such an indirect change in land use could be the encouragement of more affordable housing than would occur without the project.

San Francisco Tomorrow et al. v. City and County of San Francisco (2015) 229 Cal.App.4th 498; Sierra Club v. County of Napa (2004) 121 Cal.App.4th 1490; San Franciscans Upholding the Downtown Specific Plan v. City & County of San Francisco (2002) 102 Cal.App.4th 656; Sequoyah Hills Homeowners Assn. V. City of Oakland (1993) 23 Cal.App.4th 704, 719.

Indirect Effects on Land Use and Development Associated with Updated TIA Fees

To determine the appropriate updates to the TIA fees, a TIA Fee Program Study was conducted. The purpose of the study was to establish the relationship, referred to as the "nexus," between new development expected to occur and the need for new and expanded major public transportation facilities. In support of the TIA Fee Program Study, an analysis of the potential economic impacts of the proposed updates to the TIA fee programs in the CTCSP and WLA TIMP areas was conducted by Economic & Planning Systems. (The complete analysis is appended to Appendix B of this EIR, as Appendix E.) The purpose of the economic impact analysis was to evaluate the feasibility of the proposed TIA fee updates in the context of new residential and mixed-use development (mixed residential, retail, and office uses) and to ascertain whether the proposed fee updates would alter land use patterns in the Specific Plan areas. The analysis was based on models that simulated the financial performance of a variety of real estate development prototypes under a range of TIA fee levels and credit structures. The analysis provided the City with a logical approach to understanding the potential impacts to development and land use as a result of the proposed TIA fees.

Indirect Effects Associated with Modifications to the Lists of Transportation Improvements

As stated in the introduction to Chapter 4, *Environmental Impacts*, the Proposed Project would not provide entitlements for any of the proposed transportation improvements. However, implementation of the Proposed Project would result in the collection of TIA fees that would be used to fund these proposed improvements. The Proposed Project's list of transportation improvements does not itself have a direct effect on land use. However, the indirect effects of the Proposed Project on land use and planning that may be realized when the proposed transportation improvements are implemented are evaluated in Section 4.4.6, *Impacts and Mitigation Measures*. An example of an indirect effect from the Proposed Project's list of transportation improvements could be induced growth.

4.4.5 Thresholds of Significance

State CEQA Thresholds

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project would have a significant impact related to land use and planning if it would:

- Physically divide an established community; and/or
- 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.

In addition to the above two thresholds, the State includes a third threshold related to land use planning. This third threshold states that the Proposed Project would have a significant impact related to land use and planning if it would "conflict with any applicable habitat conservation plan or natural community conservation plan." As discussed in the Notice of Preparation, provided in Appendix C, *Notice of Preparation/Scoping*, any potential tree removal/replacement would occur in accordance

The existing TIA program includes fees on commercial and industrial uses but does not currently include fees on residential uses. Generally, the strong real-estate market on the Westside has supported continued development over time under the current fee program. Therefore, evaluation of the feasibility of TIA fees in the context of stand-alone land uses that are currently (and would continue to be) subject to fees was not conducted; the economic impact analysis focuses on residential and residential mixed-use development prototypes.

with the Los Angeles Municipal Code, including the tree ordinance, and the recommendations of the Department of Public Works' Urban Forestry Division of the Bureau of Street Services, and thus no conflict with local policies or ordinances protecting biological resources would occur. Further, there are no County Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP) within the project area. Therefore, impacts related to conflicts with a habitat conservation plan or natural community conservation plan do not require any further analysis are not addressed herein.

City of Los Angeles CEQA Thresholds

The City of Los Angeles CEQA Thresholds Guide describes that determinations of significance for the above mentioned state thresholds should be considered in relation to land use compatibility and consistency impacts. Section H of the Thresholds Guide states that these determinations are made on a case-by-case basis (City of Los Angeles, 2006b). This is done due to the fact that the significance of land use impacts is often specific to site conditions and project operations. The following factors are to be used in the evaluation of land use and planning impacts related to the Proposed Project.

The determination of significance related to proposed land use changes and their compatibility with existing land uses is based on the following criteria:

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area:
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and,
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

The determination of significance related to land use consistency is based on the following criteria:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and,
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

4.4.6 Impacts and Mitigation Measures

The following analysis focuses on whether implementation of the proposed updates to the TIA fees or the proposed updates to the lists of transportation improvements in the CTCSP and WLA TIMP would result in significant impacts to land use and planning. No specific construction projects would be implemented based on this EIR; rather, impacts associated with the transportation improvements are addressed at a program level of detail.

Impact 4.4-1: Implementation of the Proposed Project would not physically divide an established community. This would be a *less than significant* impact.

According to the State and City CEQA Guidelines, the Proposed Project may be considered incompatible with surrounding land uses if it has the potential to disrupt the physical layout of an established community. One way that this disruption could occur is through the construction and/or development of:

- A land use type that is incompatible with existing or proposed adjacent land uses (due to size, intensity, density, or type of use); or,
- Features such as a highway, aboveground infrastructure, or an easement through an established neighborhood community that could cause a permanent disruption in the physical arrangement of that established community or otherwise isolate an existing land use.

Construction

The Proposed Project does not involve any specifically planned construction. Therefore, there would be no direct impacts to land use related to construction from the Proposed Project.

The Proposed Project would indirectly lead to construction of projects on the proposed lists of transportation improvements. The majority of the construction activities would take place within existing roadways, sidewalks, and right-of-ways and would not result in removal or alteration of the uses on adjacent property. The exception is the Lincoln Boulevard Bridge Enhancement, which would include widening of Lincoln Boulevard north and south of the bridge and the reconfiguration of the Lincoln Boulevard/Culver Boulevard interchange, and the I-10 off-ramps at Bundy Drive. The improvements associated with these two projects would occur directly adjacent to, but technically outside of, existing right-of-ways. Construction-related land use impacts, such as construction staging and temporary right-of-way encroachments, generally would not be considered significant due to their temporary nature and limited duration. Short-term indirect impacts of the Proposed Project related to construction of the proposed transportation improvements would include temporary access disruptions to adjacent land uses. This could include disruption to residences, businesses, and other retail uses that are located within the Proposed Project area. Impacts and disruptions to access during construction would be temporary and would cease once construction is completed. Construction resulting from the proposed transportation improvements 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. Thus, construction impacts from the Proposed Project would not divide a community or affect land use compatibility and impacts would be *less than significant*.

Operation

Indirect Effects Associated with Updated TIA Fees

The Proposed Project would not result in any changes in General Plan land designations or zoning classifications. Future development that occurs within the project area would be required to comply with applicable land use planning policies and regulations, including allowable land uses and development standards. Proposed amendments to the TIA fee assessment and methodology include changes to the Affordable Housing Credit. Currently, only the CTCSP provides in-lieu credit for the provision of affordable housing units. The proposed amendments offer opportunities for affordable housing in-lieu credit in the CTCSP and WLA TIMP areas. Affordable housing is currently exempt from TIA fees in the existing CTCSP and WLA TIMP. The proposed amendments maintain this exemption.

As noted in Section 4.4.4, *Methodology*, an economic analysis was conducted to evaluate the feasibility of the proposed TIA fee updates and to ascertain whether the proposed fee updates would alter land use patterns in the Specific Plan areas. The analysis focused on residential and residential mixed-use development prototypes, as these are the land use types that would be newly subjected to fees under

the Proposed Project.²⁶ The economic impact analysis found that, given the overall magnitude of development costs, the proposed TIA fees would be unlikely to materially affect market dynamics or deter feasible development from taking place in the CTCSP and WLA TIMP. The analysis concluded that the feasibility of development in the project area is principally affected by factors other than TIA fees, such as tenure, location, affordable housing component, or density bonus incentives. These factors, which would not be affected by the Proposed Project, have a larger impact on the feasibility of new developments and the amount of investor return, and are critical in determining what development will occur. Moreover, the analysis found that the proposed Specific Plan amendments relating to affordable housing credits would be supported by the market. The economic analysis concluded that, in general, the TIA fees represent such a small portion of overall development cost that TIA fees on new development along with TIA fee credits are not expected to change the broader fundamental economics of new development. Therefore, the Proposed Project would not foreseeably affect the type of land uses within the study area.

In summary, implementation of the proposed updates to the TIA fees would not alter future land use patterns. The proposed TIA fee updates would not materially affect the feasibility of development in the CTCSP and WLA TIMP areas, nor would it adversely affect development of affordable housing. Therefore, the proposed updates to the TIA fee program would not result in any direct or indirect physical impacts associated with the alteration of land use development patterns that could result in significant impacts associated with land use and planning, including changes that would physically divide an established community. As such, impacts associated with the proposed updates to the TIA fees would be **less than significant**.

Indirect Effects Associated with Modifications to the Lists of Transportation Improvements

Implementation of the Proposed Project would result in revisions to the lists of transportation improvements that would be funded, in part, by the TIA fees collected in each Specific Plan area. The majority of the proposed transportation improvements are associated with existing roadways and transportation corridors and would operate within existing roadways, sidewalks, and right-of-ways. The exception is the Lincoln Boulevard Bridge Enhancement, which would include widening of Lincoln Boulevard north and south of the bridge and the reconfiguration of the Lincoln Boulevard/Culver Boulevard interchange, and the I-10 off-ramps at Bundy Drive. The improvements associated with these two projects would occur directly adjacent to, but technically outside of, existing right-of-ways. No new roadways or transportation corridors are proposed that would divide or isolate existing neighborhoods or communities. The proposed transportation improvements would not establish new land uses. Operation of the proposed transportation improvements 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. Specifically, the new transportation improvements would improve mobility and implement bicycle and pedestrian enhancements that would be compatible with existing land uses.

Implementation of some of the transportation improvement projects, such as center running BRT, could decrease the width or number of driving lanes and/or result in the removal of some on-street

As noted in Section 4.4.4, *Methodology*, the existing TIA program includes fees on commercial and industrial uses but does not currently include fees on residential uses. Generally, the strong real-estate market on the Westside has supported continued development over time under the current fee program. Therefore, evaluation of the feasibility of TIA fees in the context of stand-alone land uses that are currently (and would continue to be) subject to fees was not conducted; the economic impact analysis focuses on residential and residential mixed-use development prototypes.

parking. Off-street parking and street parking on adjacent streets would not be affected, and the proposed loss of on-street parking is not anticipated to permanently prevent or disrupt access to surrounding land uses. Further, existing and proposed transit improvements would provide alternative methods of accessing businesses. While access to parking could be more challenging for patrons of some individual businesses, the change in parking availability would not cause a disruption of land uses that would constitute a significant land use impact.

The Proposed Project would improve transportation infrastructure only. Growth is expected in the project area with or without the amendments to the Specific Plans and the Proposed Project would not change the amount or type of growth anticipated to occur. Implementation of the Proposed Project would facilitate movement within the CTCSP and WLA TIMP areas as growth continues. It would accommodate anticipated infill or density-related growth as envisioned in the Framework and Community Plans. Implementation of the Proposed Project's transportation improvements list would not directly or indirectly induce growth and therefore would not result in development of incompatible land uses near each other.

For the reasons outlined above, operation of the Proposed Project would not result in land use incompatibilities, or physically disrupt, divide, or isolate an existing neighborhood or community. Therefore, physical impacts to land use would be *less than significant*.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts After Mitigation

For land use impacts related to dividing a community, the Proposed Project would have a *less than significant impact.*

Impact 4.4-2: Implementation of the Proposed Project 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, community plans, specific plans, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. This would be a *less than significant* impact.

Construction

No construction would occur as a direct result of the Proposed Project. However, the Proposed Project would indirectly result in construction associated with implementation of the proposed transportation improvements. Many of the proposed transportation improvements would require limited construction activity, such as restriping, minor alterations to sidewalk and curbs, and changes to signage related to parking and use of lanes. Some of the proposed transportation improvements would require substantial construction, including the Lincoln Boulevard and Sepulveda Boulevard BRTs, reconfiguration of the I-10 westbound ramps at Bundy Drive, and widening of the Lincoln Boulevard Bridge. Construction activities 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. There are no policies in applicable land use plans that are directed at construction activities. Therefore, construction impacts would not conflict

with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be *less than significant*.

Operation

State Plans and Policies

As described in Section 4.4.2, *Regulatory Framework*, applicable state plans and policies include the California Complete Streets Act, California Coastal Act, and SB 743.

California Complete Streets Act

The California Complete Streets Act requires cities that are updating their circulation elements to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the context of the general plan. The City of Los Angeles fulfilled this requirement in its recent adoption of MP 2035. The proposed transportation improvements associated with the Proposed Project are consistent with the multi-modal transportation networks identified in MP 2035. Moreover, the proposed amendments to the CTCSP and WLA TIMP would serve to implement MP 2035 by collecting fees to fund construction of these transportation improvements. As a result, the Proposed Project would be consistent with the goals of the California Complete Streets Act because the proposed traffic improvement projects would support the newly adopted Mobility Element of the General Plan and would improve transit, bicycling, and walking within the project area.

California Coastal Act

Several of the proposed transportation improvements would be located within the coastal zone, as illustrated on Figure 4.4-1. All of these improvements are located within existing roadway right-of-ways and would not constitute new development within the coastal zone. Private development within the City's coastal zones would require the standard city review processes as well as a potential review by the California Coastal Commission. Projects would require coastal development permits prior to implementation, which would ensure their consistency with the Coastal Act. Moreover, the proposed transportation improvements would improve multi-modal mobility within the project area, and would enhance public access to the coast and coastal resources. For these reasons, the Proposed Project would not conflict with the California Coastal Act.

Senate Bill 743

The Proposed Project would be consistent with SB 743 as the implementation of the proposed transportation improvements would provide the infrastructure and facilities needed to reduce vehicle trip generation. Construction of transit-oriented development (TOD), transit, and non-motorized transportation improvements, and the corresponding decrease in vehicle miles traveled (VMT) per Capita that would be realized with implementation of the Proposed Project, would align with the climate action and greenhouse gas (GHG) emissions reduction goals of SB 743.

Regional Plans and Policies

Regional Transportation Plan/Sustainable Communities Strategy

The Proposed Project would be consistent with applicable goals of the RTP/SCS as shown in **Table 4.4-2**. In particular, operation of the Proposed Project would facilitate implementation of proposed transportation improvements that would 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

RTP/SCS's goal is to "encourage land use and growth patterns that facilitate transit and non-motorized transportation." While the Proposed Project would not encourage any land use changes or growth, it would support existing land uses and anticipated growth by providing transit and non-motorized transportation facilities.

Table 4.4-2 Consistency with SCAG 2012-2035 RTP/SCS Goals

Goal	Goal Description	Analysis
1	Align the plan investments and policies with improving regional economic development and competitiveness	Consistent. The proposed transportation improvements include projects that would improve the overall multi-modal transportation system within the CTCSP and WLA TIMP planning areas. This would improve the movement of goods and people, thereby contributing to economic development and competitiveness within the project area, as well as the region as a whole.
2	Maximize mobility and accessibility for all people and goods in the region	Consistent. As stated above, the proposed lists of transportation improvements include projects that would improve all modes of transportation, thereby improving the movement of both people and goods within the project area.
3	Ensure travel safety and reliability for all people and goods in the region	Consistent. Proposed transportation improvements, such as the implementation of bike lanes, cycle tracks, bicycle and pedestrian friendly street design, mobility hubs, BRT, and bus enhancements, would result in safer and more reliable travel for people and goods in the region.
4	Preserve and ensure a sustainable regional transportation system	Consistent. The proposed transportation improvements would provide multimodal transportation options throughout the Westside. The new and improved transportation facilities would provide or enhance alternatives to motor vehicle travel and would reduce VMT per Capita within the CTCSP and WLA TIMP areas, thus providing a sustainable regional transportation system.
5	Maximize the productivity of our transportation system	Consistent. By providing new and improved multi-modal facilities, the productivity of the transportation system would be enhanced and VMT per Capita would be reduced in the CTCSP and WLA TIMP areas.
6	Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)	Consistent. The proposed transportation improvements include multi-modal transportation options and trip reduction programs, which, together, would improve air quality by reducing VMT per Capita. Additionally, the proposed transportation improvements include projects that would encourage walking and bicycling, such as bike lanes, cycle tracks, streetscape plans, and bicycle and pedestrian friendly street design.
7	Actively encourage and create incentives for energy efficiency, where possible	Consistent. The proposed transportation improvements would actively encourage and create multimodal facilities that would result in a reduction of VMT per Capita, which would reduce the use of fossil fuels. This would be accomplished through new and enhanced transit and bicycle facilities, and pedestrian-oriented improvements.
8	Encourage land use and growth patterns that facilitate transit and non-motorized transportation	Consistent. Proposed transit projects would provide more reliable, frequent, and efficient transit service in areas where existing land use and growth patterns are supportive of increased transit. The transit, bicycle, and pedestrian improvements, coupled with trip reduction programs, would reduce single-occupancy vehicle trips, improve bus technology and capacity, and encourage non-motorized transportation.
9	Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies	Consistent. Implementation of proposed roadway and intelligent transportation system (ITS) projects would enhance circulation and safety through ITS signal upgrades and intersection improvements. The proposed Neighborhood Protection Program would discourage through-traffic from using local streets and establish measures to make arterial routes more attractive than local routes for through traffic. This would enhance the safety of pedestrian and vehicular traffic in these areas.

Source: CDM Smith, 2015.

City of Los Angeles Plans and Policies

City of Los Angeles General Plan Framework

As described in Section 4.4.2, *Regulatory Framework*, the City of Los Angeles General Plan Framework Element establishes the overall policy and direction for the General Plan. The Framework provides a comprehensive citywide strategy for long-term growth and sets forth a conceptual relationship between land use and transportation. The Framework Element develops a vision for transportation in the City that is fully integrated, multimodal, provides multiple travel choices, and increases accessibility. As described in the Framework Element, this transportation vision can only be achieved through physical and operational improvements and behavioral changes that reduce the number and length of trips generated. The Proposed Project would increase mobility to support existing and future land uses within the CTCSP and WLA TIMP areas. Moreover, the proposed transportation improvements, which would reduce vehicle miles traveled by providing safe, convenient, and reliable multimodal travel options on the Westside, would be consistent with the Framework's vision of a multimodal transportation system in Los Angeles. Therefore, the Proposed Project would be consistent with the General Plan Framework Element.

Mobility Plan 2035

As discussed in greater detail in Section 4.6, *Transportation*, the proposed amendments to the CTCSP and WLA TIMP, including the amended lists of transportation improvement, were developed as part of an overall implementation strategy to realize MP 2035. The types of projects on the updated lists of transportation improvements—which include pedestrian, neighborhood, bicycle, transit, and vehicle enhancements—mirror the framework established in MP 2035, and are consistent with the City's multimodal approach to transportation planning outlined in MP 2035 that will improve mobility and create a more pedestrian friendly atmosphere throughout the City. Moreover, the proposed transportation improvements would be consistent with the five goals that define the City's mobility priorities. Improvements such as bicycle lanes, cycle tracks, and pedestrian enhancements would increase safety. The multimodal improvements would contribute to a world class infrastructure that would provide access for all Angelenos. Implementation of the Proposed Project would reduce VMT per Capita, which would result in improvements to air quality with related benefits to health. Therefore, the Proposed Project would be consistent with MP 2035.

City of Los Angeles Community Plans

The Community Plans in the CTCSP and WLA TIMP areas provide guidance with respect to land uses and also include complementary transportation goals to support the desired arrangement of land uses. These aspirational transportation goals and policies broadly aim to increase multimodal transportation opportunities; reduce vehicle trips; create safe, efficient and attractive bicycle, pedestrian, and roadway networks; and provide a circulation system that supports existing and planned land uses while reducing traffic congestion. The Proposed Project is consistent with these Community Plan transportation related goals. 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. Specifically, the proposed mobility projects would reduce VMT per Capita and would provide better access and transportation options to residents, workers, and visitors on the Westside. The proposed transportation improvements are aligned with the MP 2035 goals of enhancing pedestrian, neighborhood, bicycle, transit, and vehicle infrastructure to improve mobility and create a more pedestrian friendly atmosphere throughout the City. The Proposed Project would also be consistent with the goal of each Community Plan to achieve a circulation system that supports existing and

planned land uses and provides a transportation system that meets the needs of all types of users, including transit users, bicyclists, and pedestrians. As noted above, the Proposed Project would not alter land use patterns or change growth that is anticipated to occur in the project area with or without the proposed amendments to the Specific Plans.

As discussed in Section 4.4.2, Regulatory Framework, City of Los Angeles planning documents are being updated. The MP 2035 was recently approved and reiterated a renewed vision for multi-modal transportation in the City. In accordance with new State regulations, the City is adjusting how it achieves mobility goals. The State as a whole, and the City of Los Angeles included, is adjusting how it addresses transportation planning and traffic impact analysis. In the past the focus has been on traffic delay-based analysis with the objective of minimizing vehicle delay wherever possible. In the future, as directed by SB 743, the State, including the City of Los Angeles, will move to a VMT focus, with the objective being to reduce VMT (and therefore GHG) as appropriate. When the implementing regulations are adopted as required, SB 743 will change the way cities measure project impacts; through measuring vehicle miles traveled (VMT) versus the current priority of reducing queuing at intersections (LOS) with roadway widening as a mitigation, projects will be encouraged to reduce their GHG emissions. While existing Community Plans currently include select policies related to decreasing delay and improving Level of Service (LOS), they also include numerous goals, objectives and policies that are already aligned with SB 743's VMT focus. The Community Plan polices will be updated to reflect the new state regulations and the City's latest strategies for achieving mobility goals consistent with MP 2035 and the CTCSP and WLA TIMP (see Appendix H, Updated Community Plan Text).

As the proposed transportation improvements would enhance multimodal transportation options, decrease VMT per Capita in the Westside, and support existing and planned land uses in the Community Plan Areas, overall, the Proposed Project would be consistent with, and supportive of, the intent of the Community Plan goals, as well as policies that will be updated to reflect consistency with the MP 2035 goals and policies.

City of Los Angeles Specific Plans

As described in the Section 4.4.2, *Regulatory Framework*, there are numerous Specific Plans within the project area, which address a variety of land use and planning issues. Several of the specific plans include policies related to improving mobility, enhancing transportation safety, and providing enhanced bicycle and pedestrian features as well as the application of TDM measures where applicable. Specific policies of individual Specific Plans address access to coastal and recreation areas, providing street improvements and adequate parking along identified transportation corridors, and meeting other geographically-specific needs. The proposed transportation improvements include a wide variety of projects designed to enhance multimodal transportation, including enhanced transit, bicycle, and pedestrian facilities. The proposed transportation improvements would support Specific Plan policies, such as transit service and bicycle connection enhancements in the coastal zone, development of transit and bicycle facilities, and provision of mobility hubs that would enhance transit commuting by bridging the first/last mile of a transit user's commute. The proposed transportation improvements would also improve mobility throughout the project area, including within the Specific Plan areas. Operation of the Proposed Project would not conflict with the intent of the individual Specific Plans.

Venice Local Coastal Program

As mentioned above, a complete LCP has not been certified for the Venice Coastal Zone. The consistency of the Proposed Project with the Venice LCP is addressed under the discussion of State plans and policies above. As indicated in that discussion, the Proposed Project would be consistent with the Coastal Act.

City of Los Angeles Great Streets Initiative

The Proposed Project includes a number of improvements to Venice Boulevard, including Venice Metro Rapid Bus enhancements, streetscape improvements, and a cycle track and bike lane. Improvements are also proposed along Westwood Boulevard, which could include transit, bicycle, and pedestrian enhancements. These improvements would be consistent with the Great Streets Initiative.

Summary

As described above, the Proposed Project would not conflict with applicable state, regional, and 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. Therefore, impacts of the Proposed Project on land use plan consistency would be *less than significant*.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts After Mitigation

The Proposed Project, related to consistency with land use impacts, would be *less than significant*.