IV. ENVIRONMENTAL IMPACT ANALYSIS
H. TRAFFIC/TRANSPORTATION

The following section summarizes the information provided in the traffic report entitled Traffic Analysis for 35-Unit Condominium Project Located at the Southeast Corner of Wilshire Boulevard and Comstock Avenue in Westwood Village, prepared by Crain & Associates in November, 2004. This traffic report is provided in Appendix D to this Draft EIR.

ENVIRONMENTAL SETTING

The project site is located in the Westwood Community of the City of Los Angeles at the southeast corner of Wilshire Boulevard and Comstock Avenue, just west of the Los Angeles Country Club (see Figure IV.H-1). The project site is bounded by Wilshire Boulevard to the north, Comstock Avenue to the west and Club View Drive to the south. The surrounding area is primarily developed with residential, retail, restaurant, educational, cultural, and commercial office uses. The project site is currently vacant; therefore no existing structures will need to be removed to construct the proposed project.

The project site is served by a network of roadways that run primarily north/south and east/west. Additionally, two freeways, the San Diego Freeway (I-405) which runs north-south less than two miles west of the project site, and the Santa Monica Freeway (I-10) located approximately less than three miles south of the project site, provide access to the regional freeway network. Descriptions of the primary access roadways and freeways are provided below.

Existing Freeways

The San Diego Freeway (I-405) is a north-south oriented freeway located less than two miles west of the project site. This facility typically provides four mainline travel lanes per direction, although additional auxiliary lanes are present in the project area between some sets of on- and off-ramps. A southbound high-occupancy vehicle (HOV) lane also was recently installed in the Sepulveda pass, and a northbound HOV lane has been approved for construction. The San Diego Freeway provides a west side alternative route across the Santa Monica Mountains to the Ventura Freeway (US-101) and the Golden State Freeway (I-5). The San Diego Freeway also provides direct access to other area freeways, including an interchange with the Santa Monica Freeway (I 10) approximately two and one-half miles southwest of the project site. Access to the project area surface street network is provided by full sets of on- and off-ramps at Sunset Boulevard, Wilshire Boulevard and Santa Monica Boulevard. According to the most current data available through the Caltrans Website, traffic volumes on the San

Figure IV.H-1, Site Vicinity Map (Figure 1)

Diego Freeway along the segment between Santa Monica Boulevard (State Route 2) and Wilshire Boulevard are approximately 288,000 vehicles per day (VPD).

The Santa Monica Freeway (I-10) is the primary east-west arterial in Los Angeles County. This facility, located less than three miles south of the project, provides a continuous route from Santa Monica through Downtown Los Angeles and continues eastward through San Bernardino and Riverside counties. The Santa Monica Freeway provides four mainline travel lanes in each direction, with auxiliary lanes between some ramp locations. Surface street access is provided at Overland Avenue, south of the project site. As previously mentioned, the Santa Monica Freeway has a full interchange with the San Diego Freeway approximately two and one-half miles southwest of the project site. South of the project site, along the Santa Monica Freeway, between the San Diego Freeway interchange and Overland Avenue, traffic volumes are approximately 269,000 VPD.

Existing Streets and Highways

Wilshire Boulevard begins within Downtown Los Angeles and traverses westerly through the cities of Los Angeles and Beverly Hills to its western terminus near the Pacific Ocean in Santa Monica. This arterial provides direct access to the commercial establishments along this route and serves as a major thoroughfare between West Los Angeles and Downtown. Full ramp access to the San Diego Freeway is provided via Wilshire Boulevard southwest of the project site. Wilshire Boulevard is designated a Major Highway throughout its length. Near the San Diego Freeway interchange, four through travel lanes are provided in each direction in addition to left turn channelization at major intersections (including double left turn lanes at many locations). Near the project site, three through lanes are provided in each direction, in addition to left-turn channelization at major intersections.

Santa Monica Boulevard is a Major Highway through the southern portion of the study area. This east-west oriented roadway extends from Downtown Los Angeles through West Hollywood and Beverly Hills to near the Pacific Ocean in the City of Santa Monica. In the study area Santa Monica Boulevard exhibits a dual roadway configuration, with the northern (major) roadway providing the primary regional circulation facility, and the southern (minor) roadway serving as a local access roadway. This section of the highway is currently undergoing major rebuilding. Santa Monica Boulevard (major roadway) generally provides three through lanes and left turn channelization. Parking is prohibited along Santa Monica Boulevard (major roadway) in the project vicinity.

Beverly Glen Boulevard is a north-south facility located west of the project site. This roadway is designated as a Secondary Highway north of Wilshire Boulevard and a Major Class II Highway south of Wilshire Boulevard. South of Wilshire Boulevard two through lanes are provided in each direction with left-turn channelization provided at major intersections. North of Wilshire Boulevard, Beverly Glen Boulevard is striped to provide a single lane in each direction. Limited on-street parking is

available on some segments of Beverly Glen Boulevard. Beverly Glen Boulevard provides an alternative through route from the San Fernando Valley to West Los Angeles. As such, Beverly Glen is a major commuter thoroughfare.

Comstock Avenue is a north-south roadway designated a Collector Street north of Club View Drive up to Beverly Glen Boulevard. South of its intersection with Club View Drive and north of its intersection with Beverly Glen Boulevard, Comstock Avenue is designated a Local Street. This roadway extends southerly from the UCLA campus to its termination south of Santa Monica Boulevard. In the project vicinity, Comstock Avenue is a collector street which forms the western boundary of the project site. Comstock Avenue provides one through travel lane provided in each direction, and has left-turn channelization at its intersection with Wilshire Boulevard. On-street parking on Comstock Avenue is generally permitted in the study area.

Club View Drive is a Collector Street which forms the southern boundary of the project site. Club View Drive extends southerly from Comstock Avenue at the project site, to its termination at Santa Monica Boulevard. One through travel lane is provided in each direction. On-street parking is generally permitted along this roadway.

Existing Public Transit

The Westwood area is served by a number of bus lines operated by the Metropolitan Transportation Authority (MTA), the City of Los Angeles Department of Transportation (LADOT), Santa Monica Municipal Bus Lines, Culver City Municipal Bus Lines, the Antelope Valley Transit Authority and Santa Clarita Transit. Several of these lines operate along Wilshire Boulevard, and provide stops within close walking distance of the project site. These lines provide convenient service westerly into the City of Santa Monica, easterly into Beverly Hills and Downtown Los Angeles, and northerly to the San Fernando Valley. The transit service providers and routes operating in the project vicinity are illustrated in Figure IV.H-2. Below are listed the routes within convenient walking distance of the project site.

Los Angeles County Metropolitan Transportation Authority (MTA)

Lines 20/21 provide service between Santa Monica and Downtown Los Angeles. This line operates along Wilshire Boulevard in the project vicinity and provides service on headways of approximately 8 to 10 minutes during weekdays and Saturdays. Line 20 provides Sunday and holiday service on headways of approximately 10 minutes. Line 21 does not operate on Sundays or holidays.

Figure IV.H-2, Existing Public Transit Routes (Figure 5)

Lines 4/304 provide east-west service between Santa Monica and Downtown Los Angeles via Santa Monica Boulevard. Lines 4/304 operate Monday through Friday on headways of 10 to 15 minutes. Saturday, Sunday and holiday service is also provided. Line 4 makes all stops along the designated route, however, Line 304 is a limited stop line from Sepulveda Boulevard to Sunset Boulevard in the project area.

Line 720 is a part of the MTA Metro Rapid service. This line provides east-west service between Downtown Los Angeles and Santa Monica via Wilshire Boulevard on headways of approximately 5 to 10 minutes. Service is provided daily, with longer headways during weekends and holidays. Late night/owl service is also provided.

City of Los Angeles, Department of Transportation (LADOT)

Line 431 is a commuter express route between Westwood/Rancho Park/Palms and Downtown Los Angeles. Morning peak-hour service is provided from West Los Angeles to Downtown Los Angeles with reverse service provided during the PM peak commute period. In the project vicinity, Line 431 operates along Wilshire Boulevard and Beverly Glen Boulevard. Stops are provided on Wilshire Boulevard and on Santa Monica Boulevard at Beverly Glen Boulevard. Service is provided Monday through Friday only.

Line 534 provides commuter express service from Downtown Los Angeles to West Los Angeles during the morning peak commute period, with reverse service provided during the afternoon peak commute period. Line 534 travels on headways of approximately one hour, via Santa Monica Boulevard, Beverly Glen Boulevard, and Wilshire Boulevard in the project vicinity. A stop is provided near the project site, on Wilshire Boulevard at Beverly Glen Boulevard. Line 534 provides service during weekdays only.

Line 573 also provides commuter express service between Mission Hills, Northridge and Encino to Westwood and Century City. In the project vicinity Line 573 operates along Wilshire Boulevard and Beverly Glen Boulevard. A stop is provided on Wilshire Boulevard at Beverly Glen Boulevard, just west of the project site. Line 573 provides service on weekdays only, during morning and afternoon peak commute periods.

Santa Clarita Transit

Line 792 provides express service between the Santa Clarita Valley and Westwood/Century City. Line 792 provides service from Century City and Westwood to Santa Clarita during the morning peak commute period and reverse service during the afternoon peak commute period. In the project vicinity this line travels along Wilshire Boulevard and Beverly Glen Boulevard on

headways of approximately one hour. A stop is provided near the project site on Wilshire Boulevard at Beverly Glen Boulevard. Line 792 provides service Monday through Friday only.

Line 797 provides express service between the Santa Clarita Valley and Westwood/Century City. Line 797 provides service from the Santa Clarita Valley to Century City and Westwood during the morning peak commute period and reverse service during the afternoon peak commute period. In the project vicinity this line travels along Wilshire Boulevard, Beverly Glen Boulevard and Santa Monica Boulevard on headways of approximately 30 to 45 minutes. Line 797 operates Monday through Friday only. Stops near the project site are provided on Wilshire Boulevard at Beverly Glen Boulevard.

Antelope Valley Transit Authority (AVTA)

Route 786 provides service between Lancaster/Palmdale and Century City/West Los Angeles. Route 786 provides Monday through Friday service to Century City/West Los Angeles during the morning peak commute period and reverse service to Lancaster/Palmdale during the afternoon peak commute period. Near the project site, this route travels along Wilshire Boulevard. Although the Route 786 stops are not directly adjacent to the project site, when transfer opportunities are considered, this route is a viable option for service between the Antelope Valley and the study area. Stops in the project vicinity are located on Wilshire Boulevard at Westwood Boulevard, west of the project site, and on Constellation Boulevard at Avenue of the Stars, southeast of the project site.

When transfer opportunities are considered the bus lines outlined on the previous pages provide convenient regional and local access to and from the project site and the greater Los Angeles Basin.

Existing Traffic Volumes

This analysis contains a detailed evaluation of traffic conditions during the typical weekday AM and PM peak hours at the following four study intersections:

1. Beverly Glen Boulevard and Wilshire Boulevard
2. Comstock Avenue and Wilshire Boulevard
3. Comstock Avenue and Club View Drive
4. Club View Drive and Santa Monica Boulevard

In addition to these four intersections, the following two street segments were also analyzed:

5. Comstock Avenue south of Wilshire Boulevard

6. Club View Drive east of Comstock Avenue

As shown on Figure IV.L-3, the intersections and roadway segments examined in the traffic study are those within the area immediately surrounding the project site. Based on the project's location and access relative to the local transportation network, these are the locations expected to be impacted most by the proposed project.

Traffic volumes for existing conditions at the four study intersections were obtained from manual traffic counts conducted in April 2004. The counts cover the weekday 7:00 to 9:00 AM and 4:00 to 6:00 PM peak traffic periods. The count days represent typical, non-summer conditions, with UCLA classes in normal session. Peak-hour volumes were determined individually for each intersection based on the combined four highest consecutive 15-minute volumes for all vehicular movements at the intersection. Weekday peak-hour volumes at the study intersections are illustrated in Figures IV.H-4 (AM peak hour) and IV.L-5 (PM peak hour). The manual intersection traffic count data sheets are provided in Appendix D.

In addition to the study intersection counts, 24-hour automated traffic counts were conducted on the two neighborhood street segments noted above. These counts were also collected in April 2004. The 24-hour automated traffic count data sheets are included in Appendix D.

Analysis of Existing (2004) Traffic Conditions

The traffic analyses of the four study intersections were performed through the use of established traffic engineering techniques for the critical peak periods. The traffic count data described above were used to determine existing traffic flow conditions. Other data pertaining to intersection geometrics and traffic signal operations were obtained from field surveys and LADOT plans of the study locations.

The methodology used in this study for the analysis and evaluation of traffic operations at each study intersection is based on procedures outlined in Circular Number 212 of the Transportation Research Board.[1] In the discussion of Critical Movement Analysis (CMA) for signalized intersections, procedures have been developed for grading the operational quality of an intersection in terms of the "Level of Service" (LOS) which describes different traffic flow characteristics. Levels of Service A to C operate quite well. Level D typically is the level for which a metropolitan area street system is

[1] *Transportation Research Board, Interim Materials on Highway Capacity, Circular Number 212, 1980.*

Figure IV.H-3, Study Intersection and Street Segments (Figure 2)

Figure IV.H-4, Existing (2004) Traffic Volumes AM Peak Hour (Figure 4a)

Figure IV.H-5, Existing (2004) Traffic Volumes PM Peak Hour (Figure 4b)

designed. Level E represents volumes at or near the capacity of the highway that may result in stoppages of momentary duration and fairly unstable flow. Level F occurs when a facility is overloaded and is characterized by stop-and-go traffic with stoppages of long duration. The LOS corresponding to a range of CMA values (i.e., volume-to-capacity ratios) is shown in Table IV.H-1.

Table IV.H-1
Level of Service as a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested conditions, vehicles clear in a single cycle.	< 0.60
B	Similar to above.	> 0.60 < 0.70
C	Light congestion; occasional backups on critical approaches.	> 0.70 < 0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	> 0.80 < 0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	> 0.90 < 1.00
F	Forced flow with stoppages of long duration.	> 1.00

The technical analysis used to determine the Level of Service at the existing unsignalized all-way stop-controlled intersection of Comstock Avenue and Club View Drive was conducted via a computerized transportation analysis, which models (replicates) travel behavior for measured or projected traffic volumes. The transportation model for this intersection utilized the Highway Capacity Software (HCS 2000), a computer program based on the 2000 update of the Highway Capacity Manual published by the Transportation Research Board. The Level of Service criteria are measured by average vehicular delay in seconds per stop-controlled vehicle at an intersection. Delay is defined as the elapsed time from when a vehicle stops at the end of a queue until the vehicle departs from the stop line. Table IV.H-2 displays the Level of Service criteria relating to stop sign-controlled intersections.

Table IV.H-2
Level of Service as a Function of Stop-Controlled Delay

Level of Service	Average Control Delay* (Seconds per Vehicle)
A	≤10
B	> 10-15
C	> 15-25
D	> 25-35
E	> 35-50
F	> 50

* *From Exhibits 17-2 and 17.22 of the Highway Capacity Manual (2000).*

By applying these analysis procedures to the study intersections, the Critical Movement Analysis (CMA) values and delay values with the corresponding Levels of Service (LOS) for existing (2004) traffic conditions were calculated, as shown in Table IV.H-3.

Table IV.H-3
Level of Service (LOS) Summary
Existing (2004) Traffic Conditions

No.	Intersection	AM Peak Hour		PM Peak Hour	
		CMA/Delay	LOS	CMA/Delay	LOS
1	Beverly Glen Boulevard and Wilshire Boulevard	0.931	E	0.938	E
2	Comstock Avenue and Wilshire Boulevard	0.649	B	0.675	B
3	Comstock Avenue and Club View Drive	8.97 sec*	A	9.18 sec*	A
4	Club View Drive and Santa Monica Boulevard	0.581	A	0.752	C

* *Average delay per vehicle controlled by stop sign during the designated peak hour.*

As the values in Table IV.H-3 indicate, in general, the street network in the vicinity of the proposed project is currently operating well, with most study intersections operating at good Levels of Service (LOS A to C). The intersection of Beverly Glen Boulevard and Wilshire Boulevard is currently operating at LOS E during both the AM and PM peak hour. The congestion at this study intersection is primarily due to existing high-density office uses along Wilshire Boulevard and north-south commuter traffic along Beverly Glen Boulevard. Wilshire Boulevard is also heavily used for east/west travel due to its continuity from Downtown Los Angeles to the City of Santa Monica.

Project Trip Generation

Traffic generation rates for various land uses are specified in the current West Los Angeles Transportation Improvement and Mitigation Specific Plan (TIMP) Ordinance Number 171,492 (March 8, 1997). While this document lists the critical PM peak hour trip rates for condominium projects, such as the proposed project, the daily and AM peak hour trip rates and inbound/outbound directional split percentages are not provided. The TIMP PM peak hour rates were therefore augmented with information on daily and AM peak hour trip generation characteristics derived from surveys documented in studies conducted under the auspices of the Institute of Transportation Engineers (ITE). This information is provided in the manual, Trip Generation, 7th Edition, 2003, published by ITE. The trip generation rates in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted in the City of Los Angeles and the surrounding region. Accordingly, for this

analysis, the West Los Angeles TIMP and ITE trip rates, provided in Appendix D, were used to determine the daily, AM and PM peak-hour trips generated by the proposed project. Upon project completion and full occupancy, the proposed project is expected to generate approximately 205 daily trips, including 15 trips during the AM peak hour (3 inbound, 12 outbound) and 19 trips during the PM peak hour (13 inbound, 6 outbound).[2]

To provide a more conservative analysis, no discount was taken for the seasonal uses associated with the project site. These uses include a "pumpkin" sales operation in October, as well as a Christmas tree lot in December. Each of these activities attract substantial seasonal traffic to the site, however, for this analysis, no reduction in site traffic was taken due to development of the proposed project and the permanent removal of the seasonal uses. Also, as previously discussed under the Existing Public Transit heading of this section, the project site is served by excellent transit service. It should be noted however, that no reduction has been taken in this traffic analysis to account for transit usage.

Project Trip Distribution/Assignment

This trip distribution pattern for the proposed project was determined by considering the proposed land use, existing traffic movements, characteristics of the surrounding roadway system, the geographic location of the project site and its proximity to freeways and major travel routes, and the employment centers from which residents would likely be attracted. Based on these factors, the generalized trip distribution is summarized as follows: 15% north, 25% south, 40% east, and 20% west.[3]

The above directional distribution percentages were then disaggregated and assigned to specific routes and intersections within the study area that are expected to be used to access the project site. These project trip assignment percentages are presented in Figure IV.H-6. Applying these inbound and outbound percentages to the project trip generation discussed above, project traffic volumes at the study intersections were determined for the AM and PM peak hours, as shown in Figures IV.H-7 and IV.H-8, respectively.

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[2] *The West Los Angeles TIMP does not require a Traffic Assessment for projects which generate 42 or fewer PM peak hour trips.*

[3] *Including freeway use.*

Figure IV.H-6, Project Trip Distribution Percentages (Figure 6)

Figure IV.H-7, Project Traffic Volumes AM Peak Hour (Figure 7a)

Figure IV.H-8, Project Traffic Volumes PM Peak Hour (Figure 7b)

Parking and Access

Vehicular access to the multi-level subterranean parking structure will be provided by two project driveways located on Club View Drive at the southern boundary of the project site. One inbound-only driveway and one outbound-only driveway will provide access to and from the valet parking provided in the structure. The anticipated project driveway volumes for the AM and PM peak hours are also shown in Figures IV.H-7 and IV.H-8, respectively. In addition, a third project driveway located on Club View Drive near the southeastern project boundary will provide access to the loading dock. Trucks will be permitted to back into this driveway only.

The Los Angeles Municipal Code (LAMC) specifies parking requirements for condominium residential developments at a ratio of 2 spaces per unit. Thus, 70 parking spaces (i.e., 2 spaces x 35 dwelling units) would be required for the proposed project. Guest parking at a rate of one-half space per unit is also usually provided, which would amount to 18 guest parking spaces for the proposed project. In total, 88 parking spaces would be required of the proposed project. As the proposed project would provide a total on-site parking supply of 103 spaces, adequate on-site parking is anticipated, and no parking overflow impacts are expected.

Future (2007) Traffic Conditions

Traffic Growth

A number of projects are either planned for development or are currently under construction in the project area. Related development could contribute to traffic in and around the project vicinity in the near future. For this reason, analysis of the future traffic has been expanded to include traffic which may be generated by yet undeveloped or unoccupied projects. In order to evaluate future traffic conditions in the project area, an analysis of the existing (2004) traffic volumes was first conducted, as described in the preceding sections. For the subsequent analysis of future conditions for the year 2007, the year in which the proposed project would be completed and in operation, an "ambient growth factor" of 1.0 percent per year, compounded annually, was applied to all of the existing turning movement volumes at the four study intersections. This 1.0 percent growth factor was used to account for increases in traffic volume resulting from related projects that are not yet proposed or are outside of the study area, and, based on current trends in traffic growth in the study area, a 1.0 percent annual growth factor was deemed appropriate. The result provides the "baseline" traffic volumes for the analysis of future (2007) conditions.

Related Projects

Although the inclusion of the annual growth factor is expected to capture all area traffic increases, for the purposes of providing a conservative analysis, the traffic generated by nearby "related projects" was also added to these future baseline traffic volumes. The list of potential related projects located within an approximate one and one-half mile radius of the project site was obtained from the City of Los Angeles Department of Transportation, the City of Beverly Hills, and recent studies of projects in the area. Additionally, a number of projects are proposed on the UCLA Campus, as detailed in the University's Long-Range Development Plan (LRDP). The LRDP is a general planning document for the UCLA Campus and contains a listing of potential development that could occur on the Campus over a 15-year period. A review of the information currently available indicated that a total of 35 projects near the project site may produce additional traffic at the study intersections. Descriptions of the related projects are provided in Table II-1 in Section II, Environmental Setting, of this EIR. The locations of these related projects are shown in Figure II-14, in Section II (Environmental Setting).

The number of trips expected to be generated by the related projects was determined by applying the appropriate trip generation rates and equations from the ITE Trip Generation, 7th edition manual, 2003. These trip generation rates, equations, and totals for the related projects are contained in Appendix D.

For the analysis of Future (2007) "Without Project" traffic conditions, the related projects trip generation was assigned to the study area circulation system, using methods similar to those previously described for project trip assignment. The turning movement volumes for the related projects were then combined with the growth-factored existing volumes to estimate the Future (2007) "Without Project" AM and PM peak hour traffic volumes, shown in Figures IV.H-9 and IV.H-10, respectively. These are the "benchmark" values used in determining project traffic impacts on the street system.

Future Highway System Improvements

Many traffic control improvements have already been implemented at critical points within the existing highway network serving the project site. Left-turn channelization is incorporated in the roadway geometrics throughout the study area street system. These and other traffic control measures are an indication of a very good use of the existing highway facilities. Additionally, the City of Los Angeles has implemented the ATSAC (Automated Traffic Surveillance and Control) System at signalized intersections throughout the Westwood area. The City is currently in the process of installing ATCS (Adaptive Traffic Signal Control) along Sunset Boulevard in the vicinity of the San Diego Freeway, eastward to Veteran Avenue. Upon completion of this installation, all of the signalized study intersections will be upgraded with either the ATSAC or ATCS systems. These automated traffic control computerized system add an estimated seven to ten percent capacity to signalized intersections when compared to signals not included in the ATSAC or ATCS program.

Figure IV.H-9, Future (2007) Traffic Volumes Without Project AM Peak Hour (Figure 9a)

Figure IV.H-10, Future (2007) Traffic Volumes Without Project PM Peak Hour (Figure 9b)

In addition to these traffic signal upgrades, a major improvement program to Santa Monica Boulevard is currently ongoing in the study area. The "dual roadway" configuration of Santa Monica Boulevard and Little Santa Monica Boulevard will be replaced by a single roadway as part of the Santa Monica Boulevard Transitway project. The reconstructed roadway configuration will eventually extend from near the San Diego Freeway to the City of Beverly Hills. South of the project site the reconstructed roadway will provide additional intersection capacity. This portion of the Transitway project was assumed to be completed by the future year 2007.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

According to LADOT policy, as stated in the West L.A. TIMP, a significant impact is identified as an increase in the CMA value (i.e., V/C ratio) at a signalized intersection, due to project-related traffic, of 0.010 or more when the final ("with project") Level of Service is E or F, a CMA increase of 0.020 or more when the final Level of Service is LOS D, or an increase of 0.040 or more at LOS C. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays. These criteria are summarized in Table IV.H-4 below.

Table IV.H-4
Criteria for Significant Traffic Impact at Signalized Intersections

Final CMA	Level of Service	Project-Related Increase in CMA
0.701-0.800	C	Equal to or greater than 0.040
>0.801-0.900	D	Equal to or greater than 0.020
>0.901	E, F	Equal to or greater than 0.010

Source: West Los Angeles Transportation Improvement and Mitigation Specific Plan (TIMP).

Significance criteria for stop sign-controlled intersections have not been established by LADOT policy; hence, the significance criteria of an adjacent jurisdiction are used for this analysis. Accordingly, a project is deemed to have a significant traffic impact at an unsignalized intersection based on the following criteria during a relevant peak hour:

Table IV.H-5
Criteria for Significant Traffic Impact at Unsignalized Intersections

LOS	Project-Related Increase in Average Total Delay
C or better*	Equal to or greater than 5 seconds/vehicle
D	Equal to or greater than 4 seconds/vehicle
E, F	Equal to or greater than 3 seconds/vehicle

* *For intersections initially operating better than LOS D before the project trips are added.*

In addition, the LADOT Traffic Study Policies and Procedures contain the criteria for determining whether a project would have a significant traffic impact on a residential street. These criteria are as follows:

- For streets with an average daily traffic volume (ADT) less than 2,000, the traffic impact is significant if the project increases the final ADT by 12% or more; or
- For streets with ADT greater than 2,000 but less than 3,000, the traffic impact is significant if the project increases the final ADT by 10% or more; or
- For streets with ADT greater than 3,000, the traffic impact is significant if the project increases the final ADT by 8% or more.

Project Impacts

Analysis of Future (2007) Traffic Conditions, Without and With Project

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described above. For an analysis of future project traffic impacts, the current roadway system's characteristics were assumed to prevail, with the exception of the intersection of Club View Drive and Santa Monica Boulevard. Southbound and eastbound left-turn movements were assumed prohibited at this intersection as a result of the Santa Monica Boulevard Transit Way project.

Traffic volumes for the analysis were developed as follows:

- As described earlier, future (2007) benchmark traffic volumes for the "Without Project" conditions were determined by combining area ambient traffic growth with traffic generated by the 35 identified related projects, as illustrated previously in Figures IV.H-10 and IV.H-11.

- Traffic volumes generated by the project, as determined earlier, were then added to these benchmark volumes to develop the Future (2007) "With Project" condition (to determine traffic impacts directly attributable to the proposed project). These traffic volumes are shown in Figures IV.H-11 and IV.H-12.

The results of the future year analyses are summarized in Table IV.H-6. The LOS and delay calculation worksheets are contained in Appendix D.

Prior to the addition of project traffic, the intersection of Beverly Glen Boulevard and Wilshire Boulevard is expected to operate at LOS F during both peak hours. The remaining study intersections are expected to operate at LOS D or better in the year 2007. Although the addition of project traffic will increase the CMA or delay value at all of the study intersections during both peak hours, the incremental project traffic additions will not result in a change in level of service at any of the study intersections. As the proposed project would not cause an increase in traffic at the study intersections that would exceed any of the threshold criteria listed is Tables IV.H-4 and IV.H-5, impacts would be less than significant.

Table IV.H-6
Critical Movement Analysis (CMA) and Level of Service (LOS) Summary
Existing (2004) and Future (2007) Conditions

No.	Intersection	Peak Hour	Existing		Without Project		With Project		
			CMA/ Delay	LOS	CMA/ Delay	LOS	CMA/ Delay	LOS	Impact
1	Beverly Glen Boulevard and Wilshire Boulevard	AM	0.931	E	1.054	F	1.055	F	0.001
		PM	0.938	E	1.046	F	1.047	F	0.001
2	Comstock Avenue and Wilshire Boulevard	AM	0.649	B	0.736	C	0.740	C	0.004
		PM	0.675	B	0.787	C	0.791	C	0.004
3	Comstock Avenue and Club View Drive	AM	8.97 sec*	A	9.47 sec*	A	9.53 sec*	A	0.06 sec*
		PM	9.18 sec*	A	9.60 sec*	A	9.75 sec*	A	0.15 sec*
4	Club View Drive and Santa Monica Boulevard	AM	0.581	A	0.654	B	0.656	B	0.002
		PM	0.752	C	0.826	D	0.827	D	0.001

* *Average delay per vehicle controlled by stop sign during the designated peak hour.*

Figure IV.H-11, Future (2007) Traffic Volumes With Project AM Peak Hour (Figure 10a)

Figure IV.H-12, Future (2007) Traffic Volumes With Project PM Peak Hour (Figure 10b)

Residential Street Traffic Impacts

A 24-hour traffic count was conducted in April 2004 for Comstock Avenue south of Wilshire Boulevard and Club View Drive east of Comstock Avenue, which showed a daily volume of 2,572 vehicles on the Comstock Avenue segment and 3,366 vehicles on the Club View Drive segment. The 24-hour traffic count sheets are provided in Appendix D.

For the 2007 study year, these daily volumes are expected to increase to approximately 2,826 vehicles on Comstock Avenue and 3,521 vehicles on Club View Drive due to ambient traffic growth and related projects traffic. It is estimated that the proposed project would result in approximately 135 and 40 vehicles per day being added to Comstock Avenue and Club View Drive, respectively. Table IV.H-7 shows that according to the threshold criteria noted above, neither of these roadway segments would be significantly impacted by the proposed project.

Table IV.H-7
Residential Street Impact Analysis

Street Segment	Daily Traffic Volumes			
	Existing (2004)	Without Project (2007)	With Project (2007)	Percent Project Traffic
Comstock Avenue, south of Wilshire Boulevard	2,572	2,826	2,961	4.6%
Club View Drive, east of Comstock Avenue	3,366	3,521	3,561	1.1%

Congestion Management Program (CMP) Analysis

The Congestion Management Program (CMP) was enacted by the State Legislature following the passage of Proposition 111 in 1990. The purpose of the CMP is to address the impact of local growth on the regional transportation system. The Los Angeles County Metropolitan Transportation Authority (MTA), the local CMP agency, has designated a highway network that includes all state highways and principal arterials within the County, along with traffic monitoring locations. Local jurisdictions are required to monitor the Level of Service standards at the designated locations within this network. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The local CMP requires that all CMP intersections be analyzed where a project would likely add 50 or more trips during the peak-hours. The nearest arterial CMP monitoring station is located at Wilshire Boulevard and Beverly Glen Boulevard, west of the project site. As this location is already a study intersection, and the LADOT required analysis is more conservative than the CMP methodology, impacts identified in this analysis already supplant the CMP requirements.

In addition to the arterial intersection analysis requirements, the CMP requires that any freeway segment where a project is expected to add 150 or more trips in any direction during the peak hours also be analyzed. For the proposed project, the maximum number of directional trips would be 13 inbound trips during the PM peak hour. As the maximum peak hour trips are substantially less than the freeway threshold of 150 directional trips, no additional CMP freeway analysis is necessary.

CUMULATIVE IMPACTS

The analysis of traffic impacts considers the effects of both background growth in the region and the related projects listed in Table II-1 in Section II, Environmental Setting, of this EIR. Consequently, impacts of cumulative growth are already incorporated into the traffic model and are equivalent to those indicated for the "Future (2007) With Project" condition above. As impacts under the "Future (2007) With Project" condition would not be considered significant, as discussed above, cumulative impacts would also be less than significant.

MITIGATION MEASURES

No significant traffic impacts have been identified for the proposed project. Therefore, no traffic mitigation measures are required. However, the following recommendations would further ensure that project-related impacts remain less than significant.

- Valet – All parking at the project site should be facilitated by parking valets. A valet "call up" system should be implemented to retrieve parked vehicles in a timely fashion for residents and guests.

- Transit Information – As noted in the above analysis, the project site is served by excellent local and regional transit service. The lobby should contain a display of transit schedules and maps to assist employees, residents or guests with transit options.

- Moving Vans – The building management should maintain a "Moving Day/Furniture Delivery" log. This should be used to coordinate moving vehicles so only those that can fit on-site for scheduled loading or unloading are accommodated. All loading activity will be on-site. In the event an oversized moving truck is used, it will be required to remove the vehicle cab so that the moving vehicle completely fits on-site.

- Neighborhood Traffic Calming – While the project traffic does not warrant or require off-site measures to improve street system capacity or traffic calming measures, it is suggested that the project participate with local residents if there is a community-wide effort to address "cut thru" traffic issues.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Traffic impacts associated with the proposed project would be less than significant.