DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: September 22, 2022
Time: after 8:30 a.m.*
Place: Due to concerns over COVID-19 and continued concerns that meeting in person would present imminent risks to the health and safety of the attendees, the CPC meeting will be conducted entirely telephonically by Zoom [https://zoom.us/].

The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at https://planning.lacity.org/about/commissionsboards-hearings and/or by contacting cpc@lacity.org

Case No.: CPC-2021-3141-CA
CEQA No.: ENV-2013-0911-EIR-ADD3

Council No.: All - Citywide
Plan Area: All - Citywide

Applicant: Department of City Planning

Public Hearing: August 2, 2022
Expiration Date: N/A

PROJECT LOCATION: Citywide

PROPOSED PROJECT: An ordinance amending Section 12.26 J of the Los Angeles Municipal Code (LAMC) to update the citywide Transportation Demand Management (TDM) Ordinance (Proposed Ordinance). This update to the existing 1993 TDM Ordinance proposes new requirements for developments that exceed certain size and use thresholds to incorporate strategies to reduce drive-alone automobile trips and expand access to alternative transportation options. Projects subject to the new regulations would be required to submit a TDM Plan to the Los Angeles Department of Transportation (LADOT) for review and approval before receiving a building permit. The proposed regulations would not apply to existing buildings, businesses, or residents.

RECOMMENDED ACTIONS:

1. **Recommend** that the City Council find, based on its independent judgment, after consideration of the entire administrative record, including the Mobility Plan Environmental Impact Report (EIR), EIR No. ENV-2013-0911-EIR, SCH No. 2013041012, certified on November 25, 2015; Addendum No. ENV-2013-0911-EIR-ADD1, dated December 3, 2015; Addendum No. ENV-2013-0911-EIR-ADD2, dated March 2016; and pursuant to California Environmental Quality Act (CEQA) Guidelines, Sections 15162 and 15164 and the Addendum No. ENV-2013-0911-EIR-ADD3, dated September 9, 2022 (Exhibit D), that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the Project;

2. **Approve** and **Recommend** that the City Council adopt the Proposed Ordinance amending LAMC Section 12.26 J, Transportation Demand Management and Trip Reduction Measures (Exhibit A);

3. **Recommend** that the City Council instruct that the Proposed Ordinance be incorporated into the New Zoning Code, subject to changes to conform to the format, style, and nomenclature of the New Zoning Code;

4. **Adopt** the Staff Recommendation Report as the Commission Report on the subject; and

5. **Adopt** the Findings.

VINCENT P. BERTONI, AICP
Director of Planning

Nicholas P. Maricich, Principal City Planner

Conni Pallini-Tipton, AICP, Senior City Planner

Emily S. Gable, City Planner
Telephone: (213) 978-1342

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TABLE OF CONTENTS

Project Analysis **A-1**

Project Summary
Background
Proposed TDM Program Update
Key Issues
New Zoning Code (Chapter 1A)
Mobility Plan 2035 Status Report
Conclusion

Findings **F-1**

General Plan/Charter Findings
CEQA Findings

Public Hearing and Communications **P-1**

Appendices:

1 – Details of Program Development Process, Partnerships and Collaboration

2 – Development of the Menu of TDM Strategies

3 – Development Costs

Exhibits:

A – Proposed TDM Ordinance

B – Draft TDM Program Guidelines

C – Screenshots and Link to Beta TDM Calculator

D – Environmental Clearance: 3rd Addendum to the Mobility Plan EIR, SCH No. 2013041012, dated September 9, 2022

E – Council Motion on TDM (Council File 15-0719-S19, motion adopted May 9, 2018)

PROJECT ANALYSIS

Project Summary

Transportation Demand Management (TDM) is the application of strategies that improve the efficiency of the transportation network by shifting travel behavior away from driving alone and reducing vehicular travel demands. TDM strategies can take many forms: subsidized transit passes, free shuttles, carpool/vanpool programs, and parking management strategies encourage more efficient transportation; bike parking, bike share programs, and shared micro-mobility fleets enable travel without a car; mixed-use developments and telecommuting can reduce the distances people need to travel to meet their daily needs. TDM strategies, when applied and used broadly, can reduce vehicle trips by effectively increasing the availability of, and access to, transportation options for all users. This generates cumulative benefits for air quality and the climate.

The City has an existing TDM Ordinance, adopted in 1993, which requires new non-residential construction to implement up to seven specific TDM strategies depending on the size of the project. The ordinance's intent was to reduce congestion and improve air quality; however, it is limited in scope and the TDM strategies it requires. An update is needed to align the TDM Ordinance with current mobility goals of reducing vehicle miles traveled (VMT), drive alone trips, and greenhouse gas emissions, and to reflect newer transportation options and allow for adaptation as transportation technologies and services evolve.

In accordance with the City's mobility goals as identified in the Mobility Plan 2035 (including Policy 4.8 and Program PL.9) and City Council's motion from 2018 (CF 15-0719-S19), the Department of City Planning (DCP) and the Los Angeles Department of Transportation (LADOT) are updating the TDM Ordinance to apply more broadly to new development projects and offer a larger menu of TDM strategies that can be updated over time. By ensuring that new development is designed and operated in a way that supports sustainable transportation choices for residents, employees, and visitors, the proposed TDM Program aims to reduce dependence on drive alone trips, reduce VMT, provide more transportation options, and increase sustainable mode share.

Updating the TDM Program goes hand-in-hand with the state mandated transition from Level of Service (LOS) to VMT as the metric for California Environmental Quality Act (CEQA) transportation analysis. Following the City's 2019 adoption of VMT as a metric for evaluating transportation impacts, this proposed update to the TDM regulations will support transportation improvements and provide incentives for sustainable transportation in tandem with new development across the city.

The proposed TDM Program would apply to more projects than the current ordinance, including future residential developments, and would increase flexibility by offering a menu of more than 40 TDM strategies that reflect currently available services and technologies. The program proposes a point system, which allows the TDM requirements to scale in relation to the size of a project and creates a range of options for compliance. A proposed development project would be assigned a point target based on the size of the project and the amount of parking it provides, and would select enough TDM strategies—each with an assigned point value—to add up to its point target. The TDM Program would require annual documentation of compliance for a period of time, and monitoring reports from the largest projects. TDM requirements would

apply to both ministerial and discretionary projects that meet the ordinance's project size thresholds, and compliance would be verified through a ministerial process managed by LADOT.

The proposed TDM Program consists of the draft TDM Ordinance that is before the City Planning Commission for consideration, as well as supporting documents that are described in this report but do not require action by the City Planning Commission. Those supporting documents are: the TDM Program Guidelines, the online TDM Calculator, an ordinance updating LADOT transportation review fees, and an ordinance consolidating existing transportation investment funds into a single Mobility Investment Trust Fund.

Background

The TDM Program update is an important implementation action of the Mobility Plan 2035. It aligns with both city mobility goals and state transportation and climate policies, and was formulated through extensive staff work with research partners, a Technical Advisory Committee, and members of the public.

Initiation

The Mobility Plan 2035, adopted in 2015 and updated September 7, 2016, is the Mobility Element of the City's General Plan. It encourages greater use of TDM strategies to reduce dependence on single-occupancy vehicles (Policy 4.8). It also identifies updating the existing TDM ordinance as an implementation action of the Plan (Program PL.9).

A Council motion in 2018 (CF 15-0719-S19) directed the Los Angeles Department of Transportation (LADOT) and the Department of City Planning (DCP) to update the City's TDM ordinance, in order to expand available TDM strategies to include advancements in technology and on-demand mobility, offer and incentivize sustainable mobility choices for residents, employees, and visitors, and leverage ongoing investments to expand the region's transportation system. By further reducing drive alone trips, the proposed ordinance would advance city policy objectives related to sustainability, health, safety, energy efficiency, equity, and mobility, including those in the Mobility Plan 2035 and LA's Green New Deal (Sustainable City pLAn).

Prior Ordinances and Regulatory Environment

In June of 1990, California voters passed Proposition 111, increasing the state gas tax to provide funds for additional transportation projects. Proposition 111 also contained a provision that required counties with urbanized areas to adopt a Congestion Management Program (CMP) designed to provide stronger links between land use planning and transportation planning. Those provisions required counties to monitor congestion levels and address the impacts of new land uses on congested transportation facilities; failure to implement a CMP ran the risk of losing gas tax revenue. The Los Angeles County Transportation Commission (LACTC) adopted a CMP in 1992, which also required local jurisdictions to pass certain resolutions and ordinances to help further CMP goals, including a Transportation Demand Management (TDM) ordinance.

In 1993, the City adopted the current TDM Ordinance (LAMC Section 12.26 J, titled "Transportation Demand Management and Trip Reduction Measures") to comply with the

California State Legislature's directive for local jurisdictions to connect regional transportation planning efforts to community growth, land use, and air quality decisions. The current TDM ordinance mandates that new non-residential development that exceeds 25,000 square feet implement certain TDM measures. Since then, several Specific Plan ordinances throughout the city have also included TDM provisions.

Additionally, at a regional level, the South Coast Air Quality Management District's (South Coast AQMD) Rule 2202 requires employers with more than 250 employees at a worksite to implement an emissions-reduction program designed to reduce Vehicle Miles Traveled (VMT) and/or increase Average Vehicle Ridership (AVR). Several neighboring jurisdictions also have TDM Ordinances, including Santa Monica, Burbank, Culver City, and Pasadena.

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 directing the California Office of Planning and Research (OPR) to revise the California Environmental Quality Act (CEQA) Guidelines to establish a transportation impact metric that "promotes the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." OPR determined that VMT is the most appropriate criteria, replacing vehicle delay or Level of Service (LOS), for CEQA transportation analysis, and the City transitioned to VMT analysis in 2019 (CF 14-1169). Updating the TDM Program would complement and go beyond the City's efforts to implement SB 743, because it would require a broader range of development projects than ever before to implement strategies that reduce drive alone trips, including by-right projects that do not require CEQA analysis. The proposed TDM Ordinance is not a CEQA ordinance and would not change CEQA VMT impact thresholds.

Due to existing city, South Coast AQMD, and CEQA regulations, many large employers and attractions in Los Angeles already use TDM strategies, including carpooling, shuttles, bicycle parking, subsidized transit passes, parking management/pricing, telecommuting, and much more, to reduce drive alone trips. These programs are often most visible to the public when they are implemented by universities or popular attractions such as amusement parks and large venues. However, TDM strategies can also be effective when implemented at a smaller scale and targeted to serve building occupants such as employees or residents. One objective of the proposed TDM Program update is to incorporate TDM into more development projects across the city over time.

City Mobility and Sustainability Goals

The TDM Program is part of the City's comprehensive approach to mobility and sustainability, which seeks to accommodate mobility needs by maintaining safe and efficient transportation networks, delivering world-class infrastructure, and ensuring that future mobility reduces impacts to air quality and human health. Mobility Plan 2035 (Mobility Plan), the Mobility Element of the City's General Plan, plans for a balanced, multimodal transportation network and lays the policy foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles.

The Mobility Plan prioritizes safety for users of active transportation modes like bicycling and walking, as well as access to sustainable and multi-modal transportation options. Policy 4.8 of the Mobility Plan encourages "greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles." Implementation Program PL.9 of the Mobility Plan calls for the city to:

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

LA's Green New Deal (Sustainable City pLAn 2019) calls for "improving our air quality, meeting our climate goals, and enhancing Angelenos' quality of life." The targets in the Green New Deal include 1) Increase the percentage of all trips made by walking, biking, micro-mobility / matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050; 2) Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050; 3) Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045. Updating the TDM Ordinance is also an initiative, or action, of the Green New Deal.

The goals of the TDM program are further supported by the General Plan Health Element (Plan for a Healthy Los Angeles) and Air Quality Element, as described in the Staff Report Findings, and other citywide policies including Vision Zero and Safe Routes to School.

TDM Program Goals

The above goals are closely tied to the main objective of the TDM Program, which is to provide more transportation options to improve accessibility to destinations, reducing drive alone trips and VMT. Reducing VMT supports GHG emissions reductions along with many co-benefits including improved air quality, transportation safety, and efficient use of transportation infrastructure. The Program includes TDM strategies that can incentivize sustainable travel options and reduce and shorten vehicle trips, helping residents, employees, and visitors minimize their reliance on vehicular travel. The TDM Program aims to advance equity by providing safe, affordable, and accessible travel options that connect people to more services, jobs, and opportunities. Ultimately, this effort can help reduce transportation-related GHG emissions, mitigate climate change, and improve quality of life for Angelenos.

Program Development Process, Partnerships, and Collaboration

The proposed updates to the TDM Ordinance are informed by national best practices and guidance from TDM professionals that are focused both locally and around the globe. TransitCenter, a foundation that works to improve urban mobility throughout the country, awarded the Mayor's Innovation Project a grant to fund the services of the State Smart Transportation Initiative (SSTI), joint project of the University of Wisconsin and Smart Growth America, to provide the City with technical assistance on TDM policy, practice, implementation, and monitoring. The Shared Use Mobility Center (SUMC), a public-interest organization focused on shared mobility, also provided the City with feedback on how to integrate shared mobility into TDM plans and sponsored a TDM Forum to solicit feedback from industry experts. LADOT also solicited responses to a request for information (RFI) released to organizations that specialize in transportation data technology. The responses informed existing and emergent practices in monitoring performance outcomes of TDM policies that influence travel behavior.

In addition, LADOT and DCP formed a Technical Advisory Committee (TAC) of local practitioners with members comprising consultants, non-governmental organizations,

academics, developers, and other government agencies with diverse experience implementing TDM and mobility programs to help inform the framework of the proposed TDM Program. Both as part of the TAC and independently, City staff consulted with staff of other jurisdictions including San Francisco, Santa Monica, and Culver City to understand best practices and lessons learned from their TDM programs. LADOT and DCP staff regularly participate in regional forums to advance TDM practices hosted by the Southern California Association of Governments (SCAG) and the Los Angeles County Metropolitan Transportation Authority (Metro). LADOT also coordinates with local Transportation Management Organizations (TMOs) in various neighborhoods in the City of Los Angeles, as well as in other jurisdictions as part of Metro's TMO Network sessions.

Additional detail on staff's collaboration with SSTI, SUMC, the Technical Advisory Committee, and the RFI is provided in Appendix 1 of this staff recommendation report.

Proposed Transportation Demand Management Program Update

The proposed TDM Program update consists of several related components:

- The **TDM Ordinance** will amend the TDM requirements in the zoning code (Exhibit A).
- A new **TDM Program Guidelines** document will provide details on the TDM Program strategies and process and will be managed administratively by LADOT (Exhibit B).
- An online **TDM Calculator tool** will provide a simple process for applicants to enter project information, understand the requirements, and select TDM strategies to determine compliance (Exhibit C).

Separate from the items above, the City Council will consider the following additional components:

- An update to LADOT's transportation review fees will reflect current department processes related to VMT review and new processes related to TDM review.
- An update to the Los Angeles Administrative Code will create a Mobility Investment Trust Fund to facilitate the Mobility Investment TDM strategies.

The following section covers the general design of the TDM Program and the contents of the proposed TDM Ordinance. The City Planning Commission is asked to review the Ordinance and make a recommendation to the City Council on its adoption. Information about the related elements of the TDM Program is provided for reference only.

Proposed TDM Ordinance

The update proposes new project thresholds and additional regulations that would require new developments and substantial additions to implement TDM strategies that reduce drive alone vehicle trips. The proposed update builds on the current TDM ordinance adopted in 1993, which applies TDM requirements only to new non-residential developments of 25,000 square feet or more. The proposed TDM Ordinance modifies those requirements to apply to new residential and non-residential projects that meet the updated project size thresholds.

The regulations of the proposed TDM Program would be contained in the proposed TDM Ordinance, which would amend the Zoning Code. This includes project size thresholds (applicability), Point Target ranges, requirements to have an approved TDM Plan and provide annual documentation, penalties for non-compliance, and mechanisms for alternative compliance and relief from the Ordinance. It would also authorize LADOT to establish and

maintain the TDM Program Guidelines, which would contain details on calculating a project's Point Target within the range provided by the Ordinance (based on parking provided), the menu of TDM strategies and their associated point values, and additional application and process information. Moving the TDM strategies out of the Ordinance and into the Program Guidelines would allow the menu of strategies to be updated over time as transportation services and technology evolve and additional data becomes available on the efficacy of each TDM strategy.

The TDM Ordinance would apply to new construction that requires a building permit and results in an amount of floor area, or a number of residential units, guest rooms, seats, or students, that meets the thresholds shown in the "Level 1" column in Table 1 below. The TDM Ordinance would also apply to substantial building expansions or additions that result in new floor area or residential units meeting those same thresholds. Both ministerial (by-right) and discretionary projects would be subject to the proposed TDM Program.

Certain types of development would not be subject to the proposed TDM Ordinance. This includes: any project smaller than the project size thresholds; any project that does not fit into one of the identified uses shown in Table 1; changes of use and adaptive reuse projects that do not add substantial floor area; and single-family dwellings, including subdivision projects that create single-family dwellings or small-lot homes. In addition, the proposed TDM Ordinance lists exempt uses for which TDM strategies could be burdensome or unlikely to have a worthwhile effect on travel behavior. These include residential uses such as assisted living and homeless shelters, indoor and outdoor recreational uses, religious assembly, and some types of heavy commercial and industrial uses.

The table below shows the new project thresholds being proposed. Any project that meets or exceeds the minimum thresholds under the header 'Level 1' would be subject to the proposed Ordinance. Projects meeting the 'Level 2' and 'Level 3' size thresholds would be required to implement progressively more TDM strategies by level. Level 1 applies to the smallest projects that generate the fewest drive alone trips and lowest VMT. Level 2 applies to midsize projects that generate moderate VMT, while Level 3 is reserved for the largest projects that generate the most VMT. Note that 100% affordable housing projects (affordable up to 120% AMI) always fall into Level 1, regardless of size. A project that consists of a combination of uses that result in different Project Levels would be classified in the highest applicable Project Level.

TABLE 1: Project Level Thresholds

	Level 1	**Level 2**	**Level 3**
	New, within the net new floor area:		
Housing (except as noted in the affordable housing section)	25-49 housing units	50-249 housing units	250 housing units or more
Affordable Housing	50 or more housing units, in which all units in the Project (exclusive of managers' units) are affordable dwelling units	N/A	N/A
Employment / Office	25,000-49,999 sf of floor area	50,000-99,999 sf of floor area	100,000 sf or more of floor area
Retail / Customer-Facing	50,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf or more of floor area
Medical Use / Hospital	50,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf or more of floor area
Warehouse / Industrial Space	25,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf of floor area
Hotel / Motel	25-99 guest rooms, or suites of rooms	100-249 guest rooms, or suites of rooms	250 or more guest rooms, or suites of rooms
Arena / Stadium / Multiplex Theater	N/A	250,000-499,999 sf of total floor area (no fixed seats), or with 10,000 to 19,999 seats	500,000 sf or more of total floor area (no fixed seats), or 20,000 or more seats
School, Trade School, College, or University (that requires building permits from the City of Los Angeles)	250 or more students	N/A	N/A

Projects subject to the TDM ordinance would demonstrate compliance using a point system. Every project would be assigned a point target based on its Project Level and the amount of parking it provides. Table 2 shows the Point Target Range that corresponds to each of the three Project Levels.

TABLE 2: Project Requirements

Project Level	Point Target Range
Level 1 Projects	15-25 Points
Level 2 Projects	20-30 Points
Level 3 Projects	25-35 Points

Within the Point Target Range, the TDM Program Guidelines detail how a project's specific Point Target would be calculated based on the amount of parking it will provide. A project that provides the minimum required parking (as required by Sec. 12.21 A.4 of the LAMC, called the "generalized citywide parking baseline" for the purposes of TDM), or less parking as allowed by incentive programs or specific zoning regulations, would have a Point Target at the low end of the range. A project that provides excess parking, above the citywide parking baseline, would have a higher Point Target.

Each of the more than 40 proposed TDM strategies is worth a certain number of points based on its effectiveness at reducing drive alone trips and VMT. Compliance with the TDM Program would be achieved by a project selecting a sufficient number of TDM strategies to add up to its Point Target.

LADOT, in collaboration with the non-profit group Hack for LA, designed a TDM Calculator to assist applicants with identifying their Project Level, calculating their project's Point Target, and selecting their TDM strategies. The TDM Calculator would function as an interactive application tool. The calculator output would become documentation of the project's TDM Plan, which would be reviewed and approved by LADOT in advance of building permits being issued.

TDM Strategies

The 1993 TDM ordinance prescribes up to seven strategies, cumulatively, based on the size of a new non-residential building:

TABLE 3: TDM Strategies of the Existing Ordinance

Project Size	Required TDM Strategy
25,000+ sf	Display transportation information on a bulletin board or kiosk
50,000+ sf	Carpool/Vanpool designated parking Bicycle parking per the LAMC
100,000+ sf	Carpool/Vanpool loading area Sidewalks/pathways connecting external pedestrian circulation to each building Bus stop improvements, if necessary as a project mitigation Access from external circulation system to on-site bicycle parking facilities

The TDM Program Guidelines would contain a menu of strategies expanding the number of eligible TDM strategies from seven to more than 40, allowing for greater flexibility to achieve VMT reductions. While some of the existing strategies such as bike parking and dedicated carpool/vanpool parking are retained in the menu, the expanded strategies are derived from evidence on effective ways to reduce drive alone trips and VMT, and encompass greater options for developers to encourage employees, residents, and visitors to walk, bike, share rides, and

take public transit. The full list of TDM strategies is included below; the strategies are described in detail in Chapter 4 of the TDM Program Guidelines (Exhibit B). Bonus strategies shown in italics are available only in conjunction with other strategies in the same category.

Affordable Housing
- 20% of State Density Bonus
- TOC Tier 1, 2, or 3 or equivalent
- TOC Tier 4 or equivalent
- 100% Affordable

Bicycle Facilities
- Locate near a Bike Share Station
- Install Bike Share Station
- Bike Share Memberships
- Bicycle Parking
- Changing and Shower Facilities
- *Bicycle Facilities Bonus*

Car Sharing
- Car Share Parking
- Car Share Memberships
- Private Car Share Fleet
- *Car Sharing Bonus*
- *Electric Vehicle Bonus*

Child Care
- On-site Child Care

High-Occupancy Vehicles (HOV)
- Guaranteed Return Trip
- HOV Parking
- HOV Program
- Mandatory Trip-reduction Program

Information
- Transit Displays
- Wayfinding
- Education, Marketing, and Outreach
- Voluntary Travel Behavior Change Program
- School Safety Campaign

Mixed-Use
- Mixed-Use

Mobility Investment
- Access Improvements
- Mobility Management (Mobility Investment Trust Fund)

Parking
- Pricing and Unbundling Parking
- Parking Cash Out
- Shared Parking
- Public Parking
- Reduced Parking Supply

Shared Micro-Mobility
- Service Membership
- Local Shared Fleet

Telecommute
- Telecommute
- Televisits

Transit Access
- Neighborhood Shuttles/ Microtransit Service
- Transit Passes
- Improve Transit Service
- *Electric Transit Vehicle Bonus*

Transportation Management Organizations (TMOs)
- Join a TMO
- Create a new TMO

User-defined TDM Strategies
- User-defined strategies

The proposed menu of TDM strategies ranges widely, providing options for all types of projects and contexts. Some are physical strategies that would be built into the project or surrounding area, others are services or incentives that the building owner, manager, or employer would offer. Some would be targeted at building occupants, while others would be accessible to the public. Different strategies will work best for different uses, and the allowed uses for each strategy are listed in the TDM strategy menu in the TDM Program Guidelines.

Strategies on the menu have point values that range from one to 14 points. In general, the higher point values reflect a greater potential for VMT reduction as a result of the strategy. Appendix 2 provides information on how the TDM strategy menu and point values were developed and the research that supports the point values.

The TDM Program also allows a User-Defined Strategy to be proposed by an applicant so long as it would achieve the same goals as other strategies in the menu. An applicant would need to provide supporting evidence demonstrating the effectiveness of the measure for LADOT review, and would require a discretionary approval (Alternative Compliance) by the Director of Planning. The User-Defined Strategy option allows applicants to propose new TDM strategies as technology evolves, or unique strategies that are particularly well-suited to the project type and/or location.

In addition, the City's menu of qualifying TDM strategies can be updated over time to include new and innovative solutions, or to adjust point values based on new evidence of the strategies' effectiveness at reducing VMT and drive alone trips. Updates to the menu of strategies would not cause any projects with existing TDM Plans to become noncompliant.

However, if a property owner, manager, or tenant wishes, a project's TDM Plan could be updated as building occupants change, conditions shift, or new TDM strategies become available. This would require submission of a new TDM Plan to LADOT for approval, with enough strategies to add up to the Project's point target, but would remain a ministerial process.

Review and Approval Process

The TDM Plan submittal process and requirements are designed to be straightforward. Applicants would use the online TDM Calculator to input their proposed project's land uses and parking, and select a combination of TDM strategies that have a total point value equal to or greater than the project's Point Target. The selected strategies would be the project's TDM Plan, and an applicant would be able to submit the TDM Calculator's output to LADOT.

For by-right projects, which require building permits but no entitlements, the Los Angeles Department of Building and Safety (LADBS) would route projects subject to the proposed TDM Program to LADOT for a TDM sign-off during building permit plan check. LADOT would review the project's TDM Plan to ensure it complies with the standards laid out in the TDM Ordinance and Program Guidelines. This review would take no more than 30 days for most TDM Plans, or 90 days if the project's TDM Plan contains certain TDM strategies that require additional coordination and design, such as installing a new bike share station or setting up a partnership with BlueLA for car share memberships. The strategies that would take up to 90 days for review are identified in the TDM Program Guidelines as requiring "pre-approval" from LADOT. A TDM Plan that meets the project's Point Target would receive approval and sign-off, allowing building permits to be issued.

For projects that require discretionary review from City Planning, the project's TDM Plan would be reviewed and approved by LADOT before the entitlement is approved. In terms of process, this would occur at the same time as LADOT review of the project's transportation and VMT analysis for CEQA purposes, if applicable, because the same TDM strategies may be used for TDM Program compliance and VMT reductions. Review and approval would follow the same timeline described above. Entitlements would include a condition of approval requiring the TDM Plan be implemented and maintained.

For all projects, before any use permit and/or certificate of occupancy are issued for the project, the project applicant would be required to execute and record a Covenant and Agreement that an approved TDM Plan, and the TDM strategies contained therein, will be maintained throughout the life of the project.

A project may bring a revised TDM Plan to LADOT for review and approval at any time, as long as the selected TDM strategies are appropriate for the project use and the point values add up to the project's required Point Target.

Monitoring and Evaluation

The TDM Program involves two types of reporting by participating projects. First, projects for all Program Level categories, regardless of scale, would be required to submit annual *TDM Plan Compliance Documentation* to ensure property owners and managers are implementing the TDM strategies as specified in the TDM Plans. The TDM Plan Compliance Documentation will consist of photographs, receipts, and other documents that demonstrate the property owner and/or manager is maintaining the TDM strategies in their approved TDM Plan. The Annual TDM Plan Compliance Documentation requirement may be waived by LADOT after five years of complete and accurate submittals.

Second, a project's annual *TDM Monitoring Report* would be required to include data and performance metrics regarding the TDM strategies being implemented by the project. This is required for Level 3 projects only, the category with the largest projects and the greatest travel demand impacts. The TDM Monitoring Report may include travel surveys and parking utilization data, as specified in the project's TDM Monitoring Data Collection Plan. The TDM Program does not set project-specific VMT or trip targets; the information in Monitoring Reports will be used to evaluate the TDM Program as whole. Staff does not anticipate the Monitoring Report requirement for Level 3 projects to impose a large additional administrative burden on projects, since projects of this scale (100,000 sf of office, 250,000 sf of retail, 250 housing units, etc) may already have monitoring commitments either as a result of South Coast AQMD's Rule 2202 compliance process or commitments that are required under a Mitigation Monitoring and Reporting Program pursuant to CEQA.

An earlier draft of the TDM Ordinance proposed that both Level 2 and 3 projects be required to compile and submit annual TDM Monitoring Reports. However, some participants in the public outreach process shared concerns that this approach could present a challenge to building owners and property managers in both the level of continual effort needed to collect and report the data to LADOT and the uncertainty in receiving the desired response from building occupants to inform programmatic success. To allay these concerns, staff has revised the monitoring and evaluation framework in the most recent draft TDM Ordinance and Program Guidelines. Instead, the City would take the lead on collecting the data necessary for program evaluation for smaller projects, and only require property owners and managers of Level 3 projects to collect monitoring data.

To effectuate monitoring and evaluation under the revised approach, the City would look to partner with research teams with the support of other agencies to design sample data collection plans that are sufficient to validate the effectiveness of TDM strategies that are required to comply with the TDM Program. Potential funding sources to support the City's evaluation of the TDM Program include the Caltrans Sustainable Transportation Planning Grant Program and the Regional Early Action Planning (REAP) Program, which is a budgeted program managed by SCAG. Several SCAG staff served on the City's TDM TAC, and LADOT participates in SCAG's Technical Advisory Committee which is involved in developing regional TDM data standards. Through this venue, City staff are engaging SCAG in ways to explore future partnerships in evaluating TDM effectiveness throughout the region and SCAG staff have expressed ongoing interest.

Compliance and Enforcement

Through the enforcement aspect of the TDM Program, LADOT would seek to verify that property owners are maintaining the TDM strategies in their TDM Plan and providing the City with annual documentation and reports as required. There would be no penalty for failing to achieve desired travel behavior outcomes of the building occupants.

To support compliance and enforcement of the TDM Program, LADOT plans to hire additional staff to review TDM Plans, TDM Plan Compliance Documentation, and TDM Monitoring Reports. Property owners that are not implementing their selected TDM strategies and/or following the outlined Compliance Documentation and Monitoring Report requirements would be found to be non-compliant. Voluntary compliance is preferable, and LADOT would first issue a notice to comply to any project that is non-compliant. However, the City would reserve the right to administer both financial penalties and withhold issuance of building and use permits, and issuance of Certificates of Occupancy, for any properties that fail to comply with the TDM Program.

Citywide Applicability and Specific Plans

The existing TDM Ordinance applies citywide, with the exception of certain Specific Plan areas for which a Specific Plan has adopted additional TDM requirements. Although these Specific Plan TDM regulations often include a longer list of TDM strategies (as compared to the seven prescriptive strategies in the existing citywide ordinance) the majority do not set a standard for how many TDM strategies is sufficient to meet the Specific Plan's requirement. Thus, compliance has been difficult to determine and enforce.

Applying the proposed TDM Program's point system, more expansive and modern (and able to be updated) menu of TDM strategies, and compliance and monitoring requirements to projects in most Specific Plans would bring additional consistency and accountability to TDM in those plan areas, as well as provide more flexibility with respect to strategies available to allow compliance with the TDM requirement. To achieve this, the proposed TDM Ordinance includes a provision that it would prevail over conflicting regulations of Supplemental Use Districts, Specific Plans, and other overlays.

There are a few exceptions to the citywide application of the proposed TDM Program update. Certain Specific Plans are linked to vested development agreements that cannot be superseded by updated zoning regulations, including the Porter Ranch Specific Plan and the Paramount Pictures Specific Plan. The proposed TDM Ordinance also specifically exempts two Specific Plans: The Loyola Marymount University Specific Plan currently requires a campus-wide TDM plan, which staff determined is appropriate for that educational use and context. The Warner Center 2035 (Specific) Plan currently uses different project size thresholds than the proposed citywide TDM Program and specifically incentivizes projects to join the Transportation Management Organization (TMO) for the plan area. Because the Warner Center 2035 Plan will require restudy in the coming years, staff proposes to leave the Warner Center 2035 Plan's TDM regulations in place for now, and re-evaluate them when that restudy occurs. Staff heard from Warner Center stakeholders, including members of the Warner Connects TMO advisory board, that support this approach.

Comparison to Existing Ordinance

The existing TDM ordinance applies to new non-residential buildings 25,000 square feet or more in size. The proposed TDM Ordinance would apply more broadly, as previously described, with project size thresholds that vary by use.

The current ordinance requires developers to provide a bulletin board or kiosk with alternative transportation options as the basic TDM strategy for a 25,000+ square foot building, and prescribes up to seven total strategies depending on the size of the building, no matter the context. The proposed Ordinance both requires more TDM measures from projects, and provides more options for compliance. With the proposed update, developers will be able to choose from more than 40 strategies that have proven records in academic research of influencing travel behavior. The proposed TDM Program also provides an option for a developer to create a new TDM strategy, and for LADOT to update the menu of TDM strategies over time to recognize new technology, transportation services, and research.

Currently, a project's TDM Plan is recorded in a covenant on the property. However, no monitoring of compliance or performance is required. Under the proposed TDM Ordinance, projects will still record a covenant and agreement so that the requirement for a TDM Plan is memorialized if and when it changes ownership. In addition, annual TDM Plan Compliance Documentation will be required of all projects and performance Monitoring Reports will be required of the larger Level 3 projects.

The proposed TDM Program would have a phase-in period to allow for training of staff and allow the development community time to adapt their projects to the new TDM options. Implementation would be delayed by 6 months after adoption of the ordinance for Level 2 and 3 projects, and would be delayed by one year for Level 1 (the smallest) projects. Projects that had already submitted a complete application to the City before the phase-in dates would not be subject to the updated TDM Ordinance.

Administrative Changes – TDM Program Guidelines and TDM Calculator

TDM Program Guidelines

City staff, in collaboration with research partners at SSTI, prepared the TDM Program Guidelines document. The Program Guidelines are intended to assist project applicants in understanding and complying with the TDM Ordinance. This document outlines several goals, including encouraging residents and workers in new developments to shift trips from drive alone vehicle trips to more sustainable modes, which has environmental, public health, and equity benefits. The TDM Program Guidelines also detail the body of academic literature focused on the effect of the availability and accessibility of TDM strategies to influence transportation behavior patterns that are integral to the Program.

The TDM Program Guidelines also describe procedures for compliance with the TDM Ordinance requirements and monitoring for large projects. The TDM Program Guidelines conclude with a section regarding potential updates to the Program, which LADOT would update administratively when new research is available on effectiveness of strategies to meet the Ordinance requirements and desired outcomes. The TDM Program Guidelines include appendices detailing common terms, substantiation including academic literature, a summary of TDM strategies, compliance and monitoring templates for applicants, and Transportation Management Organization (TMO) certification guidelines.

TDM Calculator

The TDM Calculator is a tool that assists project applicants in meeting the requirements of the TDM Ordinance. The Calculator is a web-based application built with the assistance of Hack for LA, a non-profit organization and the local chapter of Code for America. Project applicants input

project specifics, such as square footage of uses and provided parking spaces. The TDM Calculator has a user-friendly interface for navigating the required Point Target and for selecting strategies from the menu of options to meet that target. The Calculator creates a summary of project details and the proposed TDM Plan, which may be submitted to LADOT for review.

Additional Program Elements for Consideration by City Council

LADOT will recommend two proposed ordinances to the City Council for review concurrent with the proposed TDM Ordinance. One is an update to the LADOT transportation-related development review fees in LAMC Section 19.15, to add fees for the review of TDM Plans, TDM Plan Compliance Documentation, and Monitoring Reports, and to adjust the balance of the development review fees to reflect increased program costs (e.g. labor rates and technology procurement) and to address changes to work flows since the City adopted VMT as a review metric.

The second is a proposed amendment to Division 5, Chapter 5 of the Los Angeles Administrative Code (LAAC) to create the authorities to collect fees into a specially designated Mobility Investment Trust Fund into which fees can be collected and then appropriated for voluntary expenditures on mobility infrastructure and operations. This technical update to existing trust funds would facilitate implementation of the Mobility Investment TDM strategies.

Key Issues

Project Thresholds and Applicability

One of the substantial changes that would be implemented by the proposed TDM Ordinance is updating the uses and sizes of projects that would be subject to the TDM Program. The existing ordinance applies TDM requirements to new non-residential projects of 25,000+ square feet, with additional requirements for projects over 50,000 and 100,000 square feet. Because the thresholds are based on project size and not tied to projects seeking entitlements, the existing TDM regulations apply equally to by-right and discretionary projects.

Under the proposed TDM Program, project thresholds would be tailored by use based on trip generation and effectiveness of TDM strategies to reduce trips and VMT. The same thresholds as the existing ordinance would be maintained for office uses. Applicability for warehouse and industrial uses would also start at 25,000 square feet, however the thresholds for Level 2 and Level 3 projects would be higher, recognizing that such uses generally do not have the same density of employees that an office may have, and therefore generate fewer trips per square foot.

As compared to office uses, medical uses and retail/customer-facing uses, which include general retail, restaurants, and personal services, generate fewer employee trips and more visitor trips, which are more difficult to influence through TDM strategies. Therefore the thresholds for retail/customer-facing uses and medical uses would be set higher, with Project Level 1 starting at 50,000 square feet.

Schools, arenas and theaters, and hotels/motels would also have discrete thresholds, derived from analysis of trip generation.

The proposed TDM requirements would continue to apply to new construction, and expand to include substantial additions if they meet the same project size thresholds. In the case of substantial additions, the required TDM Plan would apply to the entire building, but the Project Level and Point Target would be based on the size of the addition.

Changes of use and adaptive reuse projects that do not add floor area would not be subject to the proposed TDM Program. However, South Coast AQMD regulates large employers (250 or more employees), which means TDM strategies are being implemented in some existing buildings in the city.

Project Thresholds for Residential Uses and Affordable Housing

Applying TDM requirements to new residential buildings citywide is a substantial change from the existing ordinance. Residential uses are now the most prevalent development type in the city, and are anticipated to remain so as the City continues to emphasize housing development to meet demand. Including residential development in the TDM Program was envisioned by the Mobility Plan 2035, and will spread TDM benefits more quickly across the city. Many residential developments take advantage of incentives for infill development near transit, and implementation of TDM Plans for these buildings will inform, encourage, and incentivize new residents to take advantage of the multi-modal transportation options in their vicinity. TDM strategies implemented at residential buildings will also reach residents who work from home, work outside the city, or work in an older or smaller building that is not required to implement a TDM Plan.

In an earlier draft of the proposed TDM Ordinance, the Level 1 threshold for residential uses was 16 units, because that is the size at which a building in California is required to have an on-site manager. Based on feedback received, staff revised the Level 1 threshold to 25 units. Thus relatively small residential projects, most of which are permitted by-right, would not be required to comply with the proposed TDM Program.

Affordable housing projects, in which all units except managers' units are income-restricted for persons or families whose annual income does not exceed 120 percent of the Area Median Income, would only be required to have a TDM Plan at 50 or more dwelling units. This is also a change from an earlier draft, which had set the threshold at 16 units. At or above 50 units, many, though not all, affordable housing projects go through an entitlement process in City Planning and therefore already have a more involved approval and permitting process. In addition, projects with new driveways adjacent to a street with a designation of Boulevard or Avenue already require LADOT driveway review, which will not change as a result of the TDM Ordinance update.

Regardless of the size, affordable housing projects would always fall into Project Level 1, with the lowest Point Target. Lower income and formerly homeless individuals tend to own fewer cars and drive less, and the proposed TDM Program should not create a barrier to permitting and building this important housing. With a Level 1 base Point Target of 15 points, affordable housing projects will generally meet the Point Target with strategies already included in the project, such as affordable housing (10 points), bicycle parking pursuant to the Zoning Code (2 points), and reduced parking supply (2-12 points).

However, staff does not recommend exempting affordable housing projects from the proposed TDM Program entirely. The benefits of TDM should be as widely available as possible, regardless of income. Also, and more importantly, the TDM strategies in an affordable housing

project's TDM Plan can reduce the project's calculated VMT, and reduce the likelihood of the project needing to incorporate Mitigation Measures and prepare a Mitigated Negative Declaration (MND) (as opposed to a Categorical Exemption) for the purposes of CEQA. The time savings and reduced legal liability for an affordable housing project of preparing a ministerial TDM Plan and a Categorical Exemption rather than an MND is an important benefit of the proposed TDM Program. Staff conversations with mixed income and affordable housing developers indicate the CEQA streamlining effect of including residential uses in the proposed TDM Program will be a valued benefit. The CEQA implications are explained further in the following section.

Overlap with CEQA Review and Analysis of VMT Impacts

The revised TDM Ordinance would potentially reduce the CEQA review required when the TDM strategies chosen by a project to satisfy the TDM Program are demonstrated to reduce VMT below the City's screening criteria or thresholds for VMT impacts. Development projects that seek a discretionary approval from the City are required to be evaluated pursuant to CEQA. Since 2019, that has included screening for and, if appropriate, analysis of potential VMT impacts. Today, those projects that need to analyze VMT and are found to exceed a VMT impact threshold need to implement mitigation measures to reduce VMT to a less than significant level and adopt a Mitigated Negative Declaration, or prepare an Environmental Impact Report (EIR) with a statement of overriding considerations.

Under the proposed TDM Program, TDM strategies that a project selects for its TDM Plan to comply with the TDM Program would be classified as "Regulatory Compliance Measures" (RCMs) for the purposes of CEQA. RCMs are considered integral to the project because they are required to comply with the LAMC; therefore any VMT reductions due to RCMs would generally not be treated as a mitigation measure. A project that otherwise may exceed the VMT impact threshold would have an incentive to select TDM strategies for its TDM Plan that provide the biggest reductions in VMT. Using TDM strategies to reduce VMT to below a level of significance would be most viable for projects in dense, transit-rich areas, and CEQA streamlining for these projects is in line with the City's policy goals supporting infill development.

In addition, with the proposed TDM Ordinance in place, projects subject to TDM would be required by code to implement VMT-reducing strategies, whether or not a CEQA VMT analysis would be required for that project. In this way, the proposed TDM Program would help achieve the City's VMT, GHG, and climate change objectives above and beyond the requirements of CEQA.

Geographic Context

The proposed TDM Program would apply uniformly across the city, with most TDM strategies available to any project in any location (apart from some strategies that are restricted to certain project uses). However, through the outreach process, staff received questions about why the proposed Program is not more tailored based on location or neighborhood context.

The TDM Program recommended by staff does not include variations by location, location-based incentives, or discounts for projects in certain locations, because to achieve the city's mobility, sustainability, equity and climate change goals it is important to implement TDM in all parts of the city. Projects located in dense neighborhoods and close to transit do tend to generate lower VMT, and development in these locations is already incentivized through a number of local and state programs including Transit Oriented Communities (TOC) and CEQA

streamlining. Implementing TDM strategies in new projects in dense, well-connected neighborhoods encourages the new residents and employees to actually make use of the sustainable transportation options that already exist. On the other hand, for projects in lower density neighborhoods that are less well-served by public transit and other transportation options, TDM supports a variety of ways for people to reduce reliance on cars, including offering points for mixed-use projects, carpool//vanpool programs, car share, and bicycle facilities.

Parking Management

The consideration of parking policy is integral to the functioning of the proposed TDM Program update. The number of parking spaces built will greatly affect the travel behavior of the future people who live, work, or visit the development. The proposed TDM Program acknowledges research that providing free parking encourages greater automobile ownership and higher rates of driving alone. Conversely, the research indicates that priced parking can encourage people to use more sustainable modes of transportation.

Neither the current TDM ordinance nor the proposed update changes the amount of parking a developer needs to provide as part of a new development project. Minimum parking requirements are and will remain regulated by other sections of the Zoning Code. The interaction between potential future changes to minimum parking requirements and the proposed TDM Program is described later in this section.

Promoting efficient use of parking is a program goal and the TDM Program has strong incentives to encourage projects to provide no more parking than the amount already required by the municipal code. The TDM Program also awards points to projects that rely on existing incentives to reduce the minimum parking they must provide, such as parking reductions available to projects that provide affordable housing or bicycle parking. Other TDM strategies encourage parking to be used more efficiently by awarding points to developments that share parking spaces between uses that operate at different times of day or make their parking spaces available to the general public.

Poor parking management results in the perception of scarcity of parking even while the total supply of parking may be sufficient, yet underused. There is little incentive today for properties to share their parking supply with other properties or the greater public. As an example, a 2013 study of off-street private commercial parking measured supply along the Wilshire corridor in Brentwood, which is a neighborhood perceived to have parking scarcity. The study found parking occupancy was lower than 48 percent during peak demand times.[1] In situations where parking supply may be low, the amount of available parking can even increase with additional TDM strategies, such as unbundling the cost of parking spaces from the lease or sale of a residential unit or new office, and thereby making those spaces available for public use.

The proposed TDM Program update addresses a common issue when creating incentives for reducing parking. Often, developers will plan more parking than the required minimum for “marketability” of the building, based on perceived demand from future tenants. This occurs even in areas where there are viable alternatives to driving alone. Constructing additional parking, above the required amounts, is expensive and is passed on to the consumer, increasing the price of development and rental rates. Shoup (2014) found that the cost of a

[1] CDM Smith. Westside Mobility Plan Parking Study. October 2013

single parking space was $27,000 if above-ground, and $35,000 if underground.[2] However, the parking is often bundled in the sale or lease of the building space, which provides no incentive for people to consider whether they need an additional car and the corresponding ability to reduce the cost of living in Los Angeles. The proposed TDM Program integrates this research by increasing the Point Target of a project that provides more parking than the generalized citywide parking baseline, incentivizing developers to consider whether oversupplying parking is necessary and to look for opportunities to manage parking. This approach aims to increase parking efficiency, while also promoting a reduction in overall costs to development and housing, and promoting more sustainable transportation options.

The proposed TDM Program does not prohibit a developer from building more parking than the code-required minimum, although it would provide an incentive for the developer to apply parking management strategies so that the parking supply is used more effectively. The additional benefits of parking management are that people are given discrete choices to lower their living expenses while reducing car-related costs on the transportation system.

Future Changes to Minimum Parking Requirements

As mentioned above, the proposed TDM Program would not change required parking minimums or introduce new paths for developments to reduce their minimum parking requirement. However, there are other efforts at both the city and state level that may change parking requirements in the future. The city's New Zoning Code, recommended by the City Planning Commission in conjunction with the DTLA Community Plan, would provide five different options for parking minimums that could be applied to different contexts in the city. In the DTLA Community Plan Area, the package recommended for adoption would have no minimum parking requirement.

During this year's state legislative session, AB 2097 (Friedman) has passed both chambers. If signed by Governor Newsom, the bill would prohibit local jurisdictions from enforcing minimum parking requirements within one half mile of major transit stops, with few exceptions.

In a landscape of changing parking regulations, the way the proposed TDM Program addresses parking would remain steady for the time being. The Point Target calculation that considers excess parking above the required minimum, and the parking reduction calculation for the Reduced Parking Supply strategy are both based on the "generalized citywide parking baseline," which consists of the parking regulations set out in Section 12.21 A.4 of Chapter 1 of the LAMC. This reference point will remain the baseline even as parking regulations may change in specific locations, continuing to incentivize projects to reduce and efficiently manage parking. At some future date when the city's parking regulations have become significantly more tailored or there are lower (or no) minimums across much of the city, LADOT would be able to adjust the point structure by updating the TDM Program Guidelines.

Costs to Developers

The proposed TDM Program offers a variety of strategies that directly benefit building occupants. The change to the average cost of TDM strategies for development based on this update will vary. There will be variations in cost since there are countless combinations of more than 40 potential strategies a development may choose to meet their TDM requirements. There may also be variations based on the scale of the development, and whether the costs are

[2] Shoup, Donald. (2014). The high cost of minimum parking requirements. In Parking Issues and Policies (pp. 87-113). Emerald Group Publishing Limited.

one-time costs or ongoing commitments. Some operational strategies will incur ongoing expenses by a property owner or manager, such as a commitment to providing discounted transit passes to onsite occupants, while some operational strategies could offset costs, for example if a property manager were to generate revenue by charging to use parking spaces that were unbundled from the sale or lease of a housing unit. Conversely, physical strategies involve a one-time cost, for example when a developer funds the installation of a new bike share or car share station on or near the proposed development site.

The point values of strategies are assigned based on their expected effectiveness in reducing drive alone trips, rather than their dollar value. As a result, some strategies with high point values are relatively inexpensive or may even save a developer money. The TDM Program assigns Point Targets based on project scale, which creates a proportionate cost of TDM compliance to overall project costs. Especially for Level 1 projects, common TDM strategies that meet program compliance could be close to revenue neutral. Further, the cost to implement TDM can be lower than traditional approaches the City of Los Angeles has relied on to mitigate transportation impacts.

Appendix 3 provides examples of the development costs of a selection of TDM strategies, the cost for a typical Level 1 project to comply with the proposed TDM Program, and costs of mitigations for Level of Service (LOS) impacts that were common before the transition to VMT analysis for CEQA.

Staffing

Adoption of the proposed Ordinance would require additional LADOT staff to support both a more involved compliance process and a larger number of project reviews. LADOT staff would review and approve TDM Plans as a required sign-off on new building permits for all developments subject to the ordinance requirements through a ministerial process, as is the practice currently. LADOT staff would also review compliance documentation for all projects with a TDM Plan on an annual basis to ensure property owners and managers are maintaining the TDM strategies that they selected. Staff would also be responsible for reviewing monitoring data from Level 3 projects to evaluate the effectiveness of the program. The TDM requirements would also increase the total number of projects LADOT reviews since the program thresholds would capture many ministerial projects that do not currently require LADOT review. LADOT developed a staffing plan that addresses the staffing needs associated with the Program, which includes one Supervising Transportation Planner I/II position and four Transportation Planning Associate I/IIs. The costs for the additional staff are expected to be recovered by the revised development review fees that will be included as an accompanying ordinance to be considered by the City Council.

New Zoning Code (Chapter 1A)

The City Planning Commission, in its actions on September 23, 2021, recommended approval of the Downtown Community Plan Update and the proposed Chapter 1A or New Zoning Code. The Chapter 1A recommended by CPC included the City's current TDM Ordinance. As such, and in the event that the City Council adopts Chapter 1A of the LAMC, the proposed TDM Ordinance would be automatically incorporated into the New Zoning Code to replace the current TDM Ordinance, subject to changes to conform to the format, style and nomenclature of the New Zoning Code, making the proposed amendments applicable in the Downtown Plan Area and throughout Chapter 1A of the New Zoning Code.

Mobility Plan 2035 Status Report

The Mobility Plan 2035 (Program MG.1) calls for a report every five years detailing the accomplishments of the prior five years. As the Department with the primary responsibility for maintaining the General Plan, City Planning is currently preparing that report, although implementation of Mobility Plan programs is a shared responsibility across city departments as detailed below.

There are 173 implementation programs in *Chapter 6: Action Plan* of the Mobility Plan. As with other General Plan elements, these implementation programs represent the City's best thinking at the time on what actions should be taken to make sure that the Plan's aspirations are achieved. The precise programs the City may pursue, in which order, and when, is opportunity-driven, dependent on the availability of funding, staffing, and other necessary resources. The programs represent a range of actions that are intended to be met both in the near term and long term, and include aspirational programs which may take years before they can be initiated.

Programs are implemented by a wide range of City departments. A lead department or supporting department is identified for each program. The departments with primary responsibilities for implementation are:

- Department of Transportation (LADOT): 94 lead, 42 supporting
- City Planning (DCP): 29 lead, 48 supporting
- Department of Public Works (DPW): 2 lead, 14 supporting
- Bureau of Engineering (BOE): 1 lead, 26 supporting
- StreetsLA (Bureau of Street Services / BSS): 6 lead, 21 supporting
- Bureau of Sanitation (LASAN): 2 lead, 16 supporting
- Bureau of Street Lighting (BSL): 2 lead, 8 supporting
- Recreation and Parks (RAP): 6 lead, 5 supporting
- Los Angeles Police Department (LAPD): 4 lead, 17 supporting
- Port of Los Angeles (POLA): 5 lead, 5 supporting
- Mayor's Office: 13 lead, 25 supporting
- Council Offices: 0 lead, 91 supporting

Based on the status updates received from departments thus far, of the 173 Mobility Plan implementation programs, 17 (10%) are completed, 106 (61%) are started or ongoing, two (1%) have been started or were underway in the past but are currently on hold, and 13 (8%) have not been started. Staff is still in the process of collecting status updates on the remaining 35 programs.

Additional information will be provided in City Planning's upcoming report.

Conclusion

As identified by the Mobility Plan and Council's motion, the 1993 TDM Ordinance is due for an update that will advance the city's mobility and sustainability goals, reflect the transportation options available today, and allow flexibility for future changes to transportation technology and services. The proposed TDM Program expands TDM requirements to more projects, uses a point system to scale TDM requirements with the size of projects and effects they have on the transportation system, and introduces a menu of evidence-based TDM strategies to lead new development projects to reduce drive alone trips and VMT.

FINDINGS

Charter and General Plan Findings

City Charter Sections 556 and 558

Pursuant to City Charter Sections 556 and 558, as described below, the proposed ordinance is in substantial conformance with the purpose, intent and provisions of the General Plan, as well as in conformance with the public necessity, convenience, general welfare and good zoning practice. Specifically, the action addresses each of the following goals, objectives and policies of the General Plan as outlined below.

General Plan Framework Element Findings

The TDM Program aims to create more transportation options to improve accessibility to destinations and reduce drive alone trips citywide. By requiring new developments that meet a specified size threshold to provide multimodal transportation infrastructure and/or deploy programs that reduce vehicle trips, this program will help influence travel behavior to accommodate the growing demands on the transportation system which helps implement the following objectives and policies from the General Plan Framework Element:

> Land Use Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.
>
> Land Use Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.
>
> Land Use Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
>
> Land Use Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.

The proposed TDM Program aims to promote active transportation like walking and biking, by incentivizing developers to provide strategies that are alternatives to vehicle use and encourage more active modes of travel. These strategies live in the TDM menu of more than 40 strategies that include pedestrian access improvements, incentivizing shared parking, providing bike facilities and bike share through coordination with Metro, as well as many more TDM strategies that align with the following objectives and policies of the General Plan Framework.

> Land Use Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.

Land Use Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures in accordance the *Urban Form and Neighborhood Design* policies of this Element and Pedestrian-Oriented District Policies 3.16.1 through 3.16.3.

Land Use Goal 3E: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.

Land Use Policy 3.9.3: Determine the appropriateness of centralized and shared parking structures, and where suitable and feasible, encourage their development.

Land Use Policy 3.9.4: Promote the development of para-transit and other local shuttle system and bicycle amenities that provide access for residents of adjacent neighborhoods, where appropriate and feasible.

Land Use Policy 3.9.5: Promote pedestrian activity by the design and the siting of structures in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3.

Land Use Policy 3.9.7: Provide for the development of public streetscape improvements, where appropriate.

Land Use Goal 3F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.

Land Use Policy 3.10.2: Accommodate and encourage the development of multi-modal transportation centers, where appropriate.

Land Use Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.

Land Use Goal 3I: A network of boulevards that balance community needs and economic objectives with transportation functions and complement adjacent residential neighborhoods.

Land Use Policy 3.13.6: Design multi-family residential units to minimize the impacts of traffic and noise and incorporate recreational and open space amenities to support the needs of the residents.

Land Use Goal 3K: Transit stations to function as a primary focal point of the City's development.

Land Use Policy 3.15.2: Work with developers and the Metropolitan Transportation Authority to incorporate public- and neighborhood-serving uses and services in structures located in proximity to transit stations, as appropriate.

Land Use Policy 3.15.4: Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.

Land Use Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.

Land Use Policy 3.15.6: Establish standards for the inclusion of bicycle and vehicular parking at and in the vicinity of transit stations; differentiating these to reflect the intended uses and character of the area in which they are located (e.g., stations in some urban areas and "kiss-and-ride" facilities may have limited parking, while those in suburban locations may contain extensive parking).

Housing Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

Housing Policy 4.2.1: Offer incentives to include housing for very low- and low-income households in mixed-use developments.

Urban Form and Neighborhood Design Goal 5A: A liveable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.

Urban Form and Neighborhood Design Policy 5.1.2: Implement demonstration projects that establish proactive measures to improve neighborhood and community design, and coordinate these activities with the Los Angeles Neighborhood Initiative demonstration projects, Los Angeles County Metropolitan Transportation Authority station area activities, and other City, non-profit and private efforts.

Urban Form and Neighborhood Design Objective 5.5: Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

Urban Form and Neighborhood Design Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

The proposed TDM Program helps increase access to jobs and services by requiring various strategies be deployed by applicable projects to comply with the TDM Program. By supporting transportation modes other than drive alone car trips, the TDM Program expands and improves sustainable transportation options and increases access. Furthermore, the TDM menu of strategies includes the Mobility Investment strategy which allows projects that need to comply with TDM to choose the Mobility Investment strategy, which establishes a fund that would be invested in improving transportation infrastructure to improve access to jobs and services. With these strategies, the TDM Program helps implement the following policies:

Economic Development Policy 7.1.4: Develop an infrastructure investment strategy to support the population and employment growth areas.

Economic Development Policy 7.10.2: Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities.

The TDM Program includes options for projects to help support the deployment of electric energy DASH buses as ways to comply with TDM and help increase capacity and sustainability

of the City's transportation system. Also, staff acknowledges that through the impacts of COVID-19 telecommunication options have become more common and sometimes necessary for modern services, this program was developed with that in mind and aims to support the following policies from the General Plan Framework.

> Infrastructure and Public Services of Framework Policy 9.29.7: Encourage Additional Markets for Electric Energy such as environmentally friendly alternative fuel for transportation in electric buses and light duty vehicles.
>
> Infrastructure and Public Services of Framework Policy 9.35.4: Promote the internally and externally cost-efficient delivery of services and exchange of information using telecommunication systems.
>
> Infrastructure and Public Services of Framework Policy 9.35.6: Incorporate Appropriate Telecommunications Requirements into all relevant local policies, plans, and ordinances.
>
> Infrastructure and Public Services of Framework 9.36.1: Encourage employers to adopt telecommunication.

Mobility Plan 2035 (Mobility Element) Findings

The proposed TDM Program implements and advances the following specific Mobility Plan 2035 goals and policies aimed at creating a safer transportation environment in multiple aspects. The following goals and policies align closely with the proposed TDM Ordinance regarding mobility safety, transportation access and connectivity, and the environment:

> Goal 1: Safety First
>
> Policy 1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.
>
> Goal 2: World Class Infrastructure
>
> Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
>
> Policy 2.5 Transit Network: Improve the performance and reliability of existing and future bus service.
>
> Policy 2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.
>
> Policy 2.15 Allocation of Transportation Funds: Expand funding to improve the built environment for people who walk, bike, take transit, and for other vulnerable roadway users.
>
> Goal 3: Access for all Angelenos

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

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

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

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

Policy 3.7 Regional Transit Connections: Improve transit access and service to major regional destinations, job centers, and intermodal facilities.

TDM strategies can incentivize sustainable travel options that are available today due to advancements in modern and innovative technology that provide alternatives to vehicle travel, overall reduce and help shorten vehicle trips. Ultimately, this effort can achieve a more equitable and efficient use of transportation infrastructure, reduce transportation related GHGs, and improve quality of life in a manner that benefits all Angelenos, particularly those who depend on transit or alternative means of transportation. The proposed TDM Program replaces the current seven prescriptive strategies of the existing TDM Ordinance with a whole range of more than 40 strategies that aim to achieve many of the goals as outlined in the Mobility Plan including decreasing drive alone trips. Furthermore, the proposed Program will include a monitoring and evaluation component to enforce and improve the program over time, making it adaptable and flexible to work of the program evaluation component which uses the latest technology and data including real time information, open source data, transparency, monitoring, reporting, emergency response, departmental and agency cooperation and database management.

Goal 3: Access for all Angelenos

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

Goal 4: Collaboration, Communication & Informed Choices

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

Policy 4.2 Dynamic Transportation Information: Support a comprehensive, integrated transportation database and digital platform that manages existing assets and dynamically updates users with new information.

Policy 4.3 Fair and Equitable Treatment: Ensure the fair and equal treatment of people of all races, cultures, incomes and education levels with respect to the development and implementation of citywide transportation policies and programs

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

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

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

Policy 4.10 Public-Private Partnerships: Encourage partnerships with community groups (residents and business/property owners) to initiate and maintain enhanced public rights-of- way projects.

The proposed TDM Program aims to address issues of climate change and has parallel health benefits by encouraging active transportation and incentivizing clean fuels and fleets to help provide clean air. Shifting travel to sustainable modes of transportation has many benefits, including reducing VMT, transportation costs, opportunity costs, improving air quality, public health, and wellness. In order for TDM to be most effective it requires local and regional coordination which will be led by LADOT and will continue over time with Metro and South Coast AQMD. The following policies of the Mobility Plan will be implemented through this program.

Goal 4: Collaboration, Communication & Informed Choices

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

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

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

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

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

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

Plan for a Healthy Los Angeles (Health, Wellness and Equity Element) Findings

The connection between health and mobility has been articulated in the City's Mobility Plan 2035 and the Plan for a Healthy Los Angeles, the Health, Wellness and Equity Element of the City's General Plan. The Plan for a Healthy Los Angeles recognizes the role mobility plays in health, in both negative and positive ways, and describes a balanced, affordable, and sustainable transportation system as a cornerstone of a healthy city:

> *As a major contributor of greenhouse gas emissions, trucks and vehicles play a role in the region's poor air quality and smog, in addition to contributing to climate change. Furthermore, vehicle collisions are responsible for a significant rate of deaths in the City, and vulnerable users such as pedestrians and cyclists are at a greater risk of injury or death, according to the Health Atlas. As Los Angeles continues to make significant changes to its transit network, there are opportunities to build more sustainable communities and increase access to healthful resources, such as jobs, education centers, medical services, grocery stores, daycare, and parks. (Chapter 1: Introduction, p18-19)*

The proposed TDM Program aims to promote and incentivize active transportation improvements which implements the following Plan for a Healthy LA policies:

> Policy 2.1 Access to goods and services: Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.
>
> Policy 2.2 Healthy building design and construction: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.
>
> Policy 2.11 Foundation for health: Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.

The proposed TDM Program aims to reduce vehicle miles traveled citywide which will subsequently reduce operational vehicle emissions and toxic air pollutants. Poor air quality has a disproportionate impact on vulnerable and low-income communities and has been shown to have significant public health costs to individuals and society. The deployment of the proposed TDM Program strategies helps implement the following Plan for a Healthy Los Angeles policies:

> Policy 5.1 Air pollution and respiratory health: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health
>
> Policy 5.7 Land use planning for public health and GHG emission reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved

air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

Housing Element Findings

The proposed TDM program will help increase options of sustainable ways to travel citywide while also incentivizing mixed uses and awarding points for buildings that include affordable housing. The transportation improvements that are encouraged through the proposed TDM Program will help implement the following Housing Element objectives and policies:

Goal 2: A City in which housing helps to create safe, livable and sustainable neighborhoods.

Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.

Policy 2.2.5: Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.

Policy 2.5.1: Target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed use development, Transit Oriented Districts and designated Centers.

Air Quality Element Findings

The proposed TDM Program is designed to produce shifts to sustainable modes of transportation. Shifting travel to sustainable modes of transportation has many benefits, including reducing VMT, transportation costs, opportunity costs, improving air quality, public health, and wellness. An example includes reduced driving and increased time for exercise and family bonding as a result of working from home. This program will work in coordination with the South Coast AQMD and Metro for specific strategies of the program. While the main goal is to reduce drive alone trips the program also intends to implement the following policies in conjunction with the following policies of the Air Quality Element:

Policy 1.2.2: Pursue the City's air quality objectives in cooperation with regional jurisdictions.

Policy 1.2.3: Monitor and assess the progress of the City's air quality improvement programs.

Objective 1.3: Reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

Objective 2.1: Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

The proposed TDM Program will provide a menu of more than 40 TDM strategies that help reduce vehicle trips and LADOT will monitor and update those strategies over time with the goal of a more adaptive and responsive program. These strategies are each selected and backed by data for reducing drive alone trips and VMT. Some of the strategies include telecommunication, increasing access to transit or providing transit passes to building occupants, and encouraging carpool or car share programs. The menu of TDM strategies of the proposed TDM Program will help implement the following policies and objectives of the Air Quality Element:

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Objective 2.1: Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking / bicycling related facilities in order to reduce Vehicle Trips and / or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.

Policy 2.1.2: Facilitate and encourage the use of telecommunications (i.e. telecommuting) in both the public and private sectors, in order to reduce work trips.

Objective 2.2: Increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.

Policy 2.2.1: Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.

Policy 2.2.2: Encourage multiple-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.

Policy 2.2.3: Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.

Goal 3: Efficient management of transportation facilities and systems infrastructure using cost-effective system management and innovative demand-management techniques.

Objective 3.1: Increase the portion of work trips made by transit to levels that are consistent with the goals of the Air Quality Management Plan and the Congestion Management Plan.

Policy 3.1.1: Implement programs to finance and improve public transit facilities and service.

Policy 3.1.2: Address public safety concerns as part of transit improvement programs, such as guarded and / or well lit transit facilities, emergency equipment and safe-driving training for operators, in order to increase transit ridership.

Policy 3.1.3: Cooperate with regional transportation agencies in expediting the development and implementation of regional transit systems.

Objective 3.2: Reduce vehicular traffic during peak periods.

Policy 3.2.1: Manage traffic congestion during peak hours.

The TDM Program prioritizes the collection of transportation data, which will help demonstrate the long-term efficacy of the TDM strategies in achieving program goals. For example, parking data can help improve the program over time and inform future transportation and land use planning decisions. LADOT aims to monitor and collect data for the program and encourage projects to provide automotive parking sensors to help collect data and with a long range goal to partner with academic Institutions to continue adapting the program as new data shows what is or isn't being effective. Therefore, the proposed TDM Program will help implement the following policies and objectives of the Air Quality Element:

Objective 3.3: Install Automated Traffic Surveillance and Control Systems, utilize channelization of streets and other capital programs appropriate with the City's portion of regional goals.

Policy 3.3.1: Implement the best available system management techniques, and transportation management and mobility action plans to improve the efficiency of existing transportation facilities, subject to availability of funding.

CEQA Findings

As demonstrated in Exhibit D, approval of the proposed Transportation Demand Management Ordinance is supported by an Addendum to the Mobility Plan 2035 Final Environmental Impact Report, SCH No. 2013041012, that reviews the proposed TDM Ordinance.

An Environmental Impact Report (EIR), EIR No. 2013-911-EIR; SCH No. 2013041012, was prepared for the Mobility Plan 2035, among other approvals, and certified on August 11, 2015. A First Addendum, No. ENV-2013-911-ADD1, and Second Addendum, No. ENV-2013-911-ADD2 were prepared to evaluate subsequent updates to the Mobility Plan 2035. The Mobility Plan 2035 Final EIR was prepared in accordance with California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. The Mobility Plan 2035 FEIR and First and Second Addenda evaluate the environmental effects that could result from full implementation of the Mobility Plan 2035, the Mobility Element of the City's General Plan, and amendments to the Mobility Plan 2035 that were adopted by City Council on January 20, 2016, and September 7, 2016.

The Mobility Plan's Policy 4.8 calls for increased use of TDM strategies to reduce dependence on single-occupancy vehicles, and the Plan identifies updating the City's existing TDM Ordinance as an implementation program (Program PL.9). The proposed TDM Program is consistent with the Mobility Plan and its EIR findings, and does not create any new conditions that would require preparation of a subsequent or supplemental EIR.

The TDM Ordinance has been reviewed by the City of Los Angeles in light of Sections 15162 and 15163 of the CEQA Guidelines. As the CEQA Lead Agency, the City of Los Angeles has determined, based on the analysis presented in Exhibit D, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified 2015 Mobility Plan FEIR is the appropriate environmental documentation under CEQA for the TDM Ordinance.

PUBLIC HEARING AND COMMUNICATIONS

City staff led the engagement of a diverse array of citywide stakeholders over the last six years, which included the formation of a TDM technical advisory committee (TAC) in July 2016. To date, DCP and LADOT staff have engaged hundreds of stakeholders, including transportation experts, Transportation Management Organization (TMO) representatives, environmental advocates, developers, business representatives, neighborhood council representatives, and the general public, over the course of 83 events.

Development of the Proposed TDM Program

During the initial development of the TDM Program update, between 2017 and 2020, City staff paired the TDM outreach effort with stakeholder outreach on the related effort of adopting VMT as the City's CEQA transportation impact criteria. With the support of the Shared-Use Mobility Center (SUMC), City staff initiated engagement with TDM practitioners at the 'Managing the New Mobility' workshop held at the La Kretz Innovation Campus in June 2017. City staff subsequently formed and convened the TAC, which provided a forum for staff to introduce initial concepts for a TDM Ordinance update for discussion.

The TAC comprised representatives from neighboring jurisdictions, non-profit and advocacy organizations, transportation experts, public agencies, and large employers. Over the course of several meetings, LADOT and DCP staff convened members from other cities to share best practices for implementing TDM and met with Los Angeles Metro staff to discuss development of the TDM Program Guidelines. During this period between July 2016 and June 2019, staff presented information about the VMT transition and update to the TDM Program at nearly 50 meetings that included neighborhood council alliances (including PlanCheckNC), interest groups, non-profit organizations, practitioners, and other public agencies.

Staff released an informational video and fact sheet in January 2021 that articulated the purpose and the goals of the TDM ordinance update. The release of the draft TDM Ordinance, draft TDM Program Guidelines, and frequently asked questions followed in June 2021. During this time, LADOT and DCP staff facilitated three workshops consisting of a 30-minute presentation followed by one hour of audience questions. To accommodate members of the public who could not attend a workshop during standard working hours, the first general public workshop took place on the evening of June 7th, a second general public workshop took place the afternoon of June 16th, and an additional workshop geared towards the business community was held on June 9th. In addition to the workshops, LADOT and DCP staff held several office hour sessions to provide additional opportunities to connect with individuals and interest groups including housing advocates, hotel union representatives, and tourism industry professionals. Staff also provided follow up presentations by request to three Neighborhood Council Alliances, business professionals, and other stakeholders who were previously involved in the process.

A total of 275 comments were received during these engagement events. Staff tracked participant feedback and incorporated suggestions into revised versions of the draft TDM Ordinance and TDM Program Guidelines. Central themes emerging from public comments have been organized below. The issue of parking received the most comments of any individual topic,

with a total of 18 comments received. Please see the key issues section above for a more comprehensive discussion of some of these themes.

- Project Thresholds and Applicability: Staff received several comments suggesting a modification of previously proposed project thresholds for residential, hotel, and warehouse uses. In response to this feedback, the threshold for hotel uses was lowered from 50 to 25 units and the threshold for warehouses lowered from 250,000 to 25,000 square feet to account for smaller projects that generate a significant number of drive alone trips. The threshold for residential projects was increased from 16 to 25 units, and the threshold for 100% affordable housing projects was increased from 16 to 50 units, to minimize procedural burdens on small residential projects and affordable housing projects in particular.
- TDM Strategies and Point Value development. Staff received several comments calling for the point value associated with some strategies to be adjusted. These strategies included those associated with Bicycle Facilities, Micro-transit, and Creating a TMO. Other comments emphasized the importance of tracking strategy effectiveness to adjust point values over time, a concept that is currently envisioned for the TDM Program Guidelines. One commenter asked staff to consider the cost of strategy implementation in assigning point values. Ultimately, Point Values were based on a strategy's effectiveness at reducing VMT. However, some strategies, such as the Mobility Investment and similar strategies, were developed with a sliding point range to reflect the fact that greater investment will lead to greater impact.
- Project Review Timeline. Several comments underscored the need for LADOT staff to abide by a review timeline so that projects would not be delayed in the review process. Staff added a timeframe for LADOT to review a project's TDM plan within 30 days after the date of submission, or 90 if the plan includes any TDM strategies that need to be pre-approved by LADOT or another authorizing agency.
- Community Context: Staff received several comments urging staff to consider geographic context when calculating a project's point target and evaluating a project's TDM plan. They noted that a project located near high quality transit would have different TDM needs than a project with little or no access to transit. These commenters suggested that developer decisions are driven purely by cost and were less likely to result in the most suitable strategy. The role of community context in TDM Plans and strategy selection is covered in the Key Issues section of this staff recommendation report.
- Community Input. Complementing the above theme of geographic context, staff received several comments questioning why the program was proposed as a ministerial process, thereby limiting community members' ability to provide input on a project's TDM Plan. These commenters felt that the community has the best grasp of which TDM strategies would be most effective, and should be included in the vetting process. As noted in the below section referencing community impact statements from neighborhood councils, such a change would entail a discretionary process that would lengthen permitting timelines and therefore is not currently being contemplated by City staff.
- Parking requirements and incentives. Staff received several comments regarding parking, representing various perspectives. Several commenters felt that incentivizing reduced parking could lead to a scarcity of on-street parking for existing residents. Others felt that parking reduction should be more incentivized, and that projects providing no parking, per an existing incentive program, should be exempt from the ordinance. Some of these commenters felt that the proposed TDM Ordinance should make revisions to the city's parking regulations by reducing or eliminating parking minimums. Recognizing that the topic of parking is polarizing, staff reiterated that the

TDM program does not lower or seek to influence citywide parking requirements, nor does it impact parking regulations that are set forth by a community plan or overlay zone. A developer may select to provide parking above the code required minimum, but would have a higher point target as a result of the known effects of increased parking on increased automobile use.

- Enforcement and Non-compliance. Comments regarding enforcement were mainly concerned with staffing needs and sought to clarify which City department would be responsible for monitoring and/or enforcement of a developer's TDM Plan. Some commenters were concerned with how the permit approval process pending the approval of a project's TDM plan would integrate with the Department of Building and Safety's existing permitting processes. In particular, these commenters were concerned that the TDM process could delay a developer from obtaining certain building permits, which would customarily be obtained prior to solidifying the site plan/parking plan and prior to submitting a TDM plan to LADOT. Staff noted that the proposed program will not change LADBS's current process for issuing permits. Staff also added language to the ordinance clarifying that a project's failure to maintain compliance with the TDM program would result in the future withholding of building permits.
- Improved Transit Efficiency. Staff received several comments suggesting that improving the transit network is more effective for reducing single occupancy trips than the proposed TDM regulations. While the TDM program supports transportation behavior change through private development, the design and placement of transit facilities and infrastructure is beyond the scope of this ordinance.
- EV Parking and EV Charging. Several comments called for the program guidelines to incentivize the implementation of electric vehicles and electric charging infrastructure. Currently, the proposed program awards a bonus point for projects that provide a 100% electric vehicle fleet or membership to an EV car share program. However, no points are awarded for electric vehicles or charging infrastructure as a standalone strategy, on the basis that electric vehicles, while beneficial to the environment, do not reduce VMT.

TDM Calculator User Testing

In addition to the outreach performed and comments received by city staff, Hack for LA, the nonprofit organization developing the TDM Calculator, conducted user testing of the Calculator. In May of 2021 the Hack for LA team conducted 16 hour-long one-on-one interviews with individuals who volunteered to test the Calculator, including developers, permit expediters, land use consultants, and transportation consultants. After revisions to the Calculator, Hack for LA conducted additional user testing in March/April 2022, with eight individuals, some of whom had participated in the first round and some of whom were new. The user testing results led to improvements to the Calculator's instructions and flow. Hack for LA was also able to pass technical questions about the TDM strategies and other Program features on to City staff, who used that input to fine-tune information about the TDM strategies.

Letters from Neighborhood Councils

City staff received community impact statements from four different neighborhood councils between August 2021 and July 2022. The South Robertson Neighborhood Council supported adoption of the proposed TDM ordinance, citing that the current ordinance is outdated and ineffective. They stressed that the City should support strong enforcement and regular evaluation of TDM strategies to ensure the strategies reflect new and emerging technologies.

The North Westwood Neighborhood Council also supported adoption of the proposed ordinance, praising the program's flexibility and noting their appreciation that the draft ordinance accounts for both the size of a development and the amount of parking provided. They further called for the reform of minimum parking requirements in North Westwood. The Westside Neighborhood Council voted to support the proposed ordinance updates, if amended to allow community input on a development's selected strategies. Such a change would entail a discretionary process that would lengthen permitting timelines and therefore is not currently being contemplated by City staff. They noted concerns that the program as proposed could lead developers to consider strategy cost over effectiveness. They also recommended that a project's location should be a factor when considering strategy selection. The Northwest San Pedro Neighborhood Council sent a letter to City staff expressing support for many of the TDM strategies contained in the TDM Program Guidelines, but general concern about parking strategies, particularly the Pricing and Unbundling Parking, and Reduced Parking Supply strategies. They noted that San Pedro is a dense area with few transit options and inadequate on-street parking, and recommended the Parking TDM strategies not be allowed in "older neighborhoods" such as those areas that have substandard streets. They maintained that incentivizing parking reduction will further burden existing residents who already have difficulty finding on street parking for their vehicles.

Public Hearing/ Open House

On August 2, 2022, City staff held a joint virtual Open House and Public Hearing as a means to solicit public comment and collect public testimony before the proposed TDM program update was brought to the City Planning Commission, and ultimately to the City Council. Prior to the event, staff incorporated some of the previous feedback into revised drafts of the TDM ordinance and Program Guidelines and released these drafts on the DCP website in July 2022. A revised factsheet and a recording of an updated presentation were also made available online. Staff sent an email to approximately 18,760 listserv subscribers noticing the public hearing and providing instructions for how to participate in the virtual event. City staff held an Open House before the Public Hearing to provide an overview of changes to the TDM program, which included new proposed thresholds reflecting feedback received during the prior Public Workshops, Information Session, and office hours. Following a 20 minute presentation, staff conducted a 20 minute live Q&A and responded to written questions submitted during the presentation. The public hearing commenced after the staff-led live Q&A concluded.

Verbal and Written Communication

Staff responded to audience questions during the live Q&A session. 23 questions submitted during the Q&A were seeking clarification of some aspect of the TDM program, in particular with regards to project applicability, monitoring, and enforcement. Three of the comments received during the Q&A were critical of one aspect of the TDM program and two were supportive. Additionally, six comments were addressing an issue outside the scope of the TDM ordinance, that being improving the efficiency of the City's transit network.

Following the Q&A, a total of five attendees provided verbal testimony, both supportive and critical, during the Public Hearing portion of the event. One commenter was supportive of the TDM program, but urged staff to consider the ordinance alongside congestion pricing and Americans with Disabilities Act (ADA) compliance regulations. Two commenters were critical of the TDM program and pointed to the loss of available on street parking that could potentially impact existing residents if reduced parking supply and parking unbundling were incentivized

through the program. One commenter urged staff to consider the unequal distribution of transit in Los Angeles and how parking reductions can negatively impact businesses, while another was critical of the TDM calculator because it offered too much leniency for developers. The final commenter offering verbal testimony suggested that staff focus on identifying a network of boulevards that could be regulated to reduce drive alone trips.

Additional comments were received through the public comment period ending August 15, 2022. Six additional comment letters were received via email to staff. Three of the letters were supportive of the program. Of those, one suggested the TDM program could be bolstered by subjecting change of use projects that generate substantial parking, such as assisted living facilities, to the ordinance. The uses mentioned are currently exempted by the TDM ordinance. One letter noted that the TDM program does not directly address mass transit improvement and fails to identify existing plans to improve mass transit. This commenter also suggested a sliding scale fee, commensurate with the scale of the project, for developers of level 3 projects who wish to pay into the “Mobility Management” fund, as well as higher penalties for non-compliance. A third letter, on behalf of a private car share company, expressed support for the ordinance but suggested ways to better incentivize car share by making the car share strategy worth more points and pointing to a study recognizing the effectiveness of car share in reducing VMT. The fourth letter, from a practicing architect who had earlier provided public testimony, again underscored the need for a network of “flow boulevards” that would facilitate the continuous flow of rail and bus in order to reduce demand for drive alone trips.

Staff noted that comments received prior to the Public Hearing were specific and often focused on or critiqued a particular aspect of the proposed changes. In contrast, the majority of comments received during and after the Public Hearing, at which point staff had already incorporated feedback from the previous round of comments, were largely seeking clarification of the proposed regulations or proposing a change outside the scope of the ordinance’s purview.

APPENDICES

1 – Details of Program Development Process, Partnerships and Collaboration

2 – Development of the Menu of TDM Strategies

3 – Development Costs

APPENDIX 1: Details of Program Development Process, Partnerships and Collaboration

State Smart Transportation Initiative (SSTI) - Transit Center Grant

The Transit Center funded research and coordination with municipal governments to develop, implement, and enforce effective TDM strategies. The partnership objectives included: 1) provide technical support to quantify the effectiveness of TDM measures; 2) inform City staff of new, emerging, and innovative measures; 3) explore best practices from other public agencies for setting thresholds and performance standards to use in imposing requirements on new developments; 4) provide best practices for monitoring and enforcing TDM requirements; and 5) provide examples of policies and programs the City can use to encourage TDM in Los Angeles.

LADOT and DCP staff collaborated with SSTI, a research institute of University of Wisconsin-Madison, to compile the evidence to substantiate the effectiveness of TDM strategies. SSTI compiled this evidence to inform their report 'Modernizing Mitigation: a Demand Centered Approach'[3] with the aim to guide local agency practitioners in redesigning their approach to managing transportation as a result of new development. This report informed the technical foundation of the proposed point value system of TDM strategies.

Shared-Use Mobility Center (SUMC) Research Partnership with LADOT

LADOT partnered with SUMC to research how shared mobility can be integrated into the TDM policies of the City of Los Angeles. SUMC presented research on the critical role that shared mobility can play in achieving TDM objectives. Shared mobility can provide necessary first and last mile connections to public transit and key destinations to encourage multi-modal travel and accomplish the intended outcomes of TDM. The key recommendations from this research effort include: 1) create more options in the TDM Ordinance that serve as alternatives to drive-alone trips; 2) expand shared mobility options for large trip generators; 3) set clear performance goals and evaluation metrics; 4) establish and empower TMOs to monitor those evaluation metrics; and 5) create sustainable funding sources to support TDM programs.

TDM Technical Advisory Committee

To ensure the TDM ordinance was well grounded in local regulatory structures, and informed by pragmatic local practices, LADOT and DCP staff leading the TDM update convened a technical advisory committee to help inform the program framework. The Technical Advisory Committee (TAC) met three times beginning in Fall of 2017 where the City TDM team presented the TDM policy framework that included the program threshold, point-based system of compliance, review of available TDM strategies, and potential compliance and monitoring options. The technical advisors were able to provide insights that informed the City TDM team's recommendations. Example revised recommendations included expanding TDM options to include strategies to invest in infrastructure and programs that would serve users beyond the occupants of a new building, expanding the role of TMOs in the monitoring and compliance process, including 'light lift' requirements for affordable housing developments to serve occupants that would most benefit from TDM services, and requirements for large uses like schools, major events centers, and large hotels.

[3] SSTI. Modernizing Mitigation: A Demand Centered Approach. 2018 https://ssti.us/modernizing-mitigation/

The TDM TAC membership is composed of consultants, non-governmental organizations, academics, developers, and other government agencies with diverse experience implementing TDM and mobility programs locally in the Los Angeles region, some of whom have been involved at the early formation of TDM regulations in the early 1990's. Government agencies representatives included managers that oversee TDM programs from regional agencies such as SCAG, South Coast AQMD, Los Angeles County Public Health, and Metro as well as other local agencies that had experience with more advanced TDM regulations such as City and County of San Francisco, City of Santa Monica, the City of Culver City, and the City of Los Angeles Employee Benefits Division. Metro representation included staff that manage their rideshare and TAP services, as well as representation from their Office of Extraordinary Innovation (OEI). Non-governmental organizations, academic, and private organizations included Natural Resources Defense Council (NRDC), FASTLink DTLA, SUMC, UCLA Lewis Center, Cal Poly Pomona, SSTI, LA County BizFed, Central City Association, Civic Enterprise, Xerox/Conduent, Transportation Management Services LLC, Fehr and Peers, and Gibson Consulting. The TAC also included representatives of TMOs that manage TDM programs in Santa Monica, Glendale, Burbank, and Warner Center. Beyond the three TAC meetings, the City TDM team conducted more than 15 one-on-one interviews with technical advisors and an expanded list of practitioners that included managers of large properties.

TDM Monitoring Collaborations

Under the proposed TDM program, larger 'Level 3' properties are expected to provide monitoring data that will help LADOT program staff evaluate the effectiveness that would enable them to adjust program parameters over time, such as how many points should be assigned to a given TDM strategy. LADOT has engaged transportation technology companies, consultancies, and academic institutions to demonstrate current capabilities that are available. On January 21, 2022, LADOT released a Request for Information (RFI) to companies and research institutions to explore best practices, technologies, and platforms for LADOT that can be used to monitor travel behavior change outcomes as a result of the TDM program. LADOT requested that the interested parties respond with their best approaches in developing a TDM monitoring platform that can measure performance outcomes to reduce VMT and drive-alone car trips, ease administrative management needs for both the subject reporting parties and LADOT staff, provide cost-effective and automated solutions, and ensure an individual's privacy. LADOT received 15 responses from data companies that provided varied software and 'mobility as a service' solutions. Some solutions relied on more traditional engagement approaches with employers, property-owners, and site occupants, while other solutions demonstrated advanced capabilities in streamlining work-flows and remote data collection providing confidence that effective and efficient solutions are within reach in monitoring desired outcomes. If the City Council adopts the TDM ordinance, LADOT intends to use the responses to the RFI to request budget and prepare a Task Order Solicitation to formally partner with a third party to build a TDM monitoring platform that will enable LADOT program managers to efficiently monitor property-level behavioral trends over time from the development projects that are required to comply with the program. LADOT also participates in working groups led by SCAG and Metro to advance TDM monitoring practices in the region.

APPENDIX 2: Development of the Menu of TDM Strategies

The menu of TDM strategies is laid out in the TDM Program Guidelines document, an administrative document that the proposed TDM Ordinance authorizes LADOT to create, maintain, and update over time.

The point values assigned to each TDM strategy are largely substantiated by research on their effectiveness in reducing VMT. Strategies on the menu have point values that range from one to 14 points. In general, the higher point values reflect a greater potential for VMT reduction as a result of the strategy, as documented in the California Air Pollution Control Officers Association (CAPCOA) Handbook.[4] Strategies related to parking management, such as Reduced Parking Supply or Unbundling Parking, have some of the highest TDM point values due to their high probability of reducing driving trips. CAPCOA estimates that reducing residential parking could reduce VMT from that site by 13.7 percent.[5] Similarly, offering transit passes has been found to result in a consistent reduction of VMT, across many studies.[6]

Some TDM strategies were given a higher weighted value than the VMT reduction alone if they also reflect important policy priorities. For example, building more affordable housing will result in less VMT, though the point value also reflects a priority to encourage more housing production for low income households. The CAPCOA guide estimates a 28.6 percent VMT reduction for providing units reserved for lower income households.[7] As an added benefit, affordable housing produces more positive effects as a policy (i.e. housing people who are vulnerable to displacement or homelessness), so the TDM program reflects these effects in the total point value. Similarly, a few strategies including Changing and Shower Facilities and Neighborhood Shuttles are worth more points if they are publicly available, or publicly available and located in a disadvantaged area.[8] These strategies represent some of the equity-focused objectives of the TDM Program.

Another example is Access Improvement, which allows project developers to construct transportation improvements in the project's vicinity which benefit people walking, biking, and using transit in the neighborhood. The strategy fulfills goals related to the City's Mobility Plan 2035, specifically enhancing the pedestrian environment and implementing the Neighborhood Enhanced Network. The VMT reduction potential based on research varies, but could be up to 2 percent.[9] The research likely does not capture the full value of the strategy to all members of the public, since the improvements in creating new safe crossings and traffic calming infrastructure

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[4] Staff relied on the 2010 version of the CAPCOA handbook, "Quantifying Greenhouse Gas Mitigation Measures" in assigning points to TDM strategies. CACPOA has recently published a new version of the Handbook, "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity" with new information on the VMT reduction potential of TDM strategies. LADOT will continue to update the TDM Program Guidelines as new information becomes available on the effectiveness of TDM strategies.

[5] CAPCOA (2021), "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity," 122-125.

[6] SSTI "Modernizing Mitigation: A Demand Centered Approach" 44.

[7] CAPCOA (2021), "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity," 80.

[8] For Disadvantaged Areas, reference LADOT's Equity-Focus Mobility Development Districts as defined and mapped per Council File (CF) 17-1125.

[9] Oregon Sustainable Transportation Initiative, "Oregon Greenhouse Gas Reduction Toolkit: Strategy Report: Pedestrian Environment," https://www.oregon.gov/ODOT/Planning/Documents/SR-Pedestrian-Environment.pdf, 1.

also greatly increase the safety of the local streets and could further lead to lowering VMT at the neighborhood scale.

The TDM strategy menu also includes innovative strategies that support the program goals while researchers are still evaluating their effectiveness in reducing VMT. Micro-mobility services, which offer scooters or other small, electric personal mobility devices, have become popular in recent years. The TDM Program recognizes that these devices may help some people reduce their reliance on driving alone, especially for trips that are less than three miles long or connect to transit. Project applicants can contract with service providers or provide their own services to earn TDM points towards their target. These services are too new to have the same level of evidence of VMT reductions as other strategies that are included in the CAPCOA Handbook. However supporting new technologies and programs early in their adoption phase is in keeping with the intent of the TDM Program. Furthermore, the monitoring required of larger projects presents an opportunity to contribute to transportation research. If an applicant selects a shared micro-mobility strategy as part of their project's TDM Plan, the data from the usage of micro-mobility could help researchers evaluate the strategy's potential to reduce VMT.

Most of a strategy's score is based on the maximum potential of the strategy to reduce VMT. Most strategies are supported by research that finds a VMT reduction potential, and their point value in TDM also reflects the many policy priorities of the City of Los Angeles, including increasing the production of affordable housing, and improving transportation safety and reliability.

APPENDIX 3: Development Costs

Costs to developers of complying with the proposed TDM Program will vary based on the TDM strategies selected, whether they are ongoing programmatic strategies or involve on-time costs, and whether the strategy could raise revenue. The point values of strategies are assigned based on their expected effectiveness in reducing drive alone trips and VMT, not their dollar value. As a result, some strategies with high point values are relatively inexpensive or may even save a developer money. In other cases, strategies with high point values cost a moderate to large amount or involve an ongoing cost. Because there are over 40 TDM strategies and many possible combinations, the average cost to a development project will vary.

Some strategies that include ongoing expenses would result in a high number of points due to their effectiveness in reducing drive alone trips. For example, a Project would receive 14 points (of the 15 points needed for a small project or 25 points needed for a large project) for committing to pay the full monthly cost of a Metro transit pass (currently $100) for each employee or one per housing unit. This strategy incorporates a sliding scale that reflects the percentage of the total cost funded. For example, a property owner could receive 7 points by contributing 25% discount to a transit pass where the cost to the property owner would be $25 per month per employee or housing unit.

Parking spaces are a large expense for new construction, ranging from $27,000 to $35,000 per space depending on whether it is above or below ground.[10] Given the rise in material and labor costs, these figures are likely higher as of this staff report's publication. Taking full advantage of this measure could substantially lower costs for new construction, which is especially important to make housing more affordable. For example, a new 50 unit apartment building consisting of 1 bedroom units that uses affordable housing incentives through the City's Transit Oriented Community (TOC) Program (Tier 1-3) would be allowed to reduce minimum parking requirements to 0.5 space/dwelling unit. Building less parking, as allowed under these building incentives, could mean saving $675,000 to $875,000 in construction costs. The money saved by not building as much parking could pay for those residents to instead receive a Metro transit access pass with free fares for 11 to 14 years.

Some measures, such as unbundling parking, could offset costs incurred from implementing other TDM strategies. A project applicant could receive 8 points for unbundling the charge for parking from the lease or sale of a housing unit. Unbundling the cost of parking not only provides a helpful option to lower the cost of living expenses for onsite residents but also enables the property owner to better monetize the parking that they do build to offset the costs of their other TDM strategies. A project applicant could earn additional points if those spaces were leased to other properties or made available to the public for a fee.

For Level 1 projects, common TDM strategies that meet program compliance could be close to revenue neutral, since points are awarded to projects that use existing incentive programs, such as the density bonus or bicycle parking to reduce the required amount of parking provided. The following example assumes the development of 40,000 square feet of general office space. This Level 1 project could select the Employment Package, which consists of bike parking (an existing LAMC code requirement), priced parking, and running an education, marketing, and

[10] Shoup, Donald. (2014). The high cost of minimum parking requirements. In Parking Issues and Policies (pp. 87-113). Emerald Group Publishing Limited.

outreach program. The developer would be required to provide at least 4 short-term bike racks and 8 long-term racks. Racks can vary in price, but standard racks that fit the code standards are estimated to cost $122 each, meaning that the one-time cost of bike parking would be $1,464. Pricing parking for visitors and onsite employees to the fullest degree would mean charging $220/month per parking spot. An office building of this size is required to build 80 parking spaces according to the generalized citywide minimum parking requirement. This could generate up to $17,600 in revenue per month that the property owner or manager could use to cover the cost of other TDM strategies. The encouragement and marketing program could vary in cost, but average programs cost $40,000 per year. The annual revenue from leasing only 16 parking spots per month would pay for the cost of bike racks and running the encouragement/marketing program.

The TDM Program assigns target points based on project scale, which creates a proportionate cost of compliance to overall project costs. Further, the cost to implement TDM can be lower than traditional approaches the City of Los Angeles has relied on to mitigate transportation impacts. Prior to the City's adoption of VMT as the main metric of analyzing transportation impacts, developers would often need to pay high costs for capital projects that were intended to mitigate travel delay at intersections. Such mitigation measures often included widening the roadway at intersections and installing new traffic signals. For example, in 2012, when LADOT traffic study procedures identified measures to mitigate forecasted travel delay of a proposed subdivision, the mitigation costs to widen a road exceeded $1.4 million dollars while installing new signals exceeded $200,000 dollars each. The total value of the mitigation program for the proposed subdivision exceeded $4.5 million dollars. These improvements were much more expensive than the strategies offered via TDM, especially considering the intensive civil engineering design and utility relocations necessary to implement them. These prior means of measuring impacts and assigning mitigations were focused entirely on outcomes for people driving, often at the expense of people walking, cycling, or taking public transportation. LADOT has become less reliant on these capital-intensive mitigations since the City has shifted to review transportation impacts based on VMT. TDM fills a void in this process to shift overall investment away from expensive strategies toward strategic outcomes that can better manage transportation demand locally and regionally.

EXHIBITS

A – Proposed TDM Ordinance

B – Draft TDM Program Guidelines

C – Screenshots and Link to Beta TDM Calculator

D – Environmental Clearance: 3rd Addendum to the Mobility Plan EIR, SCH No. 2013041012, dated September 9, 2022

E – Council Motion on TDM (Council File 15-0719-S19, motion adopted May 9, 2018)

EXHIBIT A:
Proposed TDM Ordinance

CPC-2021-3141-CA, ENV-2013-0911-EIR-ADD3

For consideration by the City Planning Commission

September 22, 2022

City Planning Commission Draft, September 2022

ORDINANCE NO. _____

An ordinance amending Section 12.26 of the Los Angeles Municipal Code to update Transportation Demand Management and Trip Reduction Measures.

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. Subsection J of Section 12.26 of the Los Angeles Municipal Code is amended to replace the Transportation Demand Management and Trip Reduction Measures Ordinance in its entirety to read as follows:

J. Transportation Demand Management Program.

1. **Intent.** To ensure that new development is designed and operated to support sustainable transportation choices for residents, employees, and visitors. A Transportation Demand Management (TDM) Program includes incentives, services, policies, and physical improvements aimed at reducing drive-alone trips and Vehicle Miles Traveled (VMT), encouraging sustainable mode share, including public transit, bicycling, walking, carpooling/vanpooling, and strategies to reduce the need for trips altogether, such as telecommuting for work trips or land use strategies that increase access to destinations. The provisions contained herein are consistent with City policy documents including the Mobility Plan 2035, the Plan for a Healthy Los Angeles, and LA's Green New Deal (Sustainable City pLAn 2019), and state legislation including Senate Bill (SB) 743, the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the California Global Warming Solutions Act of 2006 (AB 32), the California Complete Streets Act of 2008, and South Coast Air Quality Management District (South Coast AQMD) Rule 2202. Implementation of the ordinance achieves the following purposes:

   (a) Reduce dependence on drive-alone trips, provide more transportation options, and increase sustainable mode share to comply with the directives of SB 743, which include the development of a multimodal transportation system and a diversity of land uses, and applicable requirements under South Coast AQMD Rule 2202.

   (b) In compliance with SB 743, mitigate the transportation impacts resulting from new development by providing sustainable, accessible, and affordable transportation options that support the journeys of people of all income levels and modal choices.

(c) Support the strong link between land use and transportation through promotion of infill development and mixed land uses that bring common destinations closer to people and make efficient use of infrastructure.

(d) Improve air quality, climate change, and public health outcomes through encouragement of sustainable mobility options and reduction of Vehicle Miles Traveled (VMT) and the associated greenhouse gas emissions generated by driving.

(e) Advance equity, particularly in disadvantaged communities whose transportation access has been historically underserved, through the provision of safe, affordable, and accessible travel options that: connect people to jobs, services, and opportunities; improve health outcomes; and increase the resilience of environmentally impacted communities.

(f) Improve street safety and reduce transportation-related collision risks through the provision of bicycle, pedestrian, and transit infrastructure and services. Support the goal of Vision Zero to eliminate traffic fatalities and severe injuries, particularly in areas of the City with the highest incidences, which disproportionately includes disadvantaged communities.

(g) Implement a balanced transportation network by embracing Complete Streets principles of safety, comfort, and convenience for all users of the public right-of-way.

2. Definitions. For the purpose of this Section, the following words and phrases shall have the meanings specified below. Other terms used in this Section shall have the meanings set forth in Section 12.03 of this Code if defined there.

Affordable Dwelling Unit. A dwelling unit which is restricted by a covenant certified by the City of Los Angeles Housing and Community Investment Department or its successor agency to be rented or sold at an affordable level to, and occupied by, persons or families whose annual income does not exceed 120 percent of the Area Median Income for persons or families residing in Los Angeles County. The Area Median Income and affordable housing costs shall be established from periodic publications of the United States Department of Housing and Urban Development, as determined by the California Department of Housing and Community Development or its successor or assignee.

LADBS. City of Los Angeles Department of Building and Safety.

LADOT. City of Los Angeles Department of Transportation.

Medical Use. An inpatient or outpatient healthcare use that provides direct medical, dental, or therapeutic services to patients. Includes, but is not limited to, hospital, medical clinic, dental, therapy, doctor, and optometry office or clinic.

Project. The construction of, addition to, or alteration of, any building or structure that requires a building permit and that results in an increase in floor area. Off-site parking areas which serve a Project shall be considered a part of the Project. Does not include any work on, change of use in, or adaptive reuse of an existing building or structure which does not result in an increase in floor area.

Retail and Customer-Facing Use. A commercial use involved in the sale or dispensing of any material good to the public, including the sale of new or used products, or the provision of consumer or rental services, or personal services. Includes, but is not limited to, general retail, food and beverage sales, eating and drinking establishments, financial services, instructional services, personal services, and heavy commercial uses.

Transportation Demand Management Program, or TDM Program. The City of Los Angeles' TDM Program is the set of regulations, requirements, processes, and implementation strategies set forth in this ordinance and the TDM Program Guidelines.

Transportation Demand Management Calculator, or TDM Calculator. A City of Los Angeles tool that intakes project information to display the Project Level and Point Target and allows a Project applicant to select TDM Strategies to meet the Point Target, to facilitate compliance with the TDM Program.

Transportation Demand Management Plan Compliance Documentation, or TDM Plan Compliance Documentation. Documentation provided by the property owner of a Project to LADOT demonstrating continued compliance with the Project's approved TDM Plan, including maintenance of all TDM Strategies.

Transportation Demand Management Monitoring Data Collection Plan, or TDM Monitoring Data Collection Plan. The TDM Monitoring Data Collection Plan is an agreement between LADOT and the project developer that specifies the required components of a TDM Monitoring Report including the performance metrics, data collection instruments, specific data collection technologies, and optimal data collection formats, as well as the monitoring data reporting frequency.

Transportation Demand Management Monitoring Report, or TDM Monitoring Report. Annual monitoring data as defined by the Project's TDM Monitoring Data Collection Plan.

Transportation Demand Management Plan, or TDM Plan. A Project's documentation, including a site plan and/or other documentation, that describes the TDM Strategies the Project will implement in order to comply with the TDM Program as approved by LADOT and any other coordinating agencies.

Transportation Demand Management Program Guidelines, or TDM Program Guidelines. A companion document to this ordinance, developed, maintained and updated by LADOT, that contains details of the TDM Program goals and benefits, processes, Point Targets, TDM Strategies, evaluation and reporting, and technical justifications.

Transportation Demand Management Strategy, or TDM Strategy. A programmatic action and/or physical feature that aims to reduce drive-alone trips and/or VMT, and/or encourages sustainable mobility options in a way that meets the intent of this Ordinance. TDM Strategies are listed and assigned a point value in the TDM Program Guidelines.

User-Defined TDM Strategy. A TDM Strategy that is not currently listed in the TDM Program Guidelines and is proposed by an applicant for inclusion in a Project's TDM Plan. A proposed User-Defined TDM Strategy shall aim to reduce drive-alone trips and/or VMT, and/or encourage sustainable mobility options in a way that meets the intent of this Ordinance. A User-Defined TDM Strategy shall be approved through the process outlined in this Section.

3. Applicability.

(a) Except as provided in Subsection 3(c), the TDM Program requirements shall apply to any Project for which the net new floor area results in an increase of at least:

25 housing units, or 50 housing units if all units in the Project (exclusive of manager's units) are affordable dwelling units, or

25,000 square feet of floor area of employment and office uses, or

50,000 square feet of floor area of Retail and Customer-Facing Uses, or

50,000 square feet of floor area of Medical Uses, or

25,000 square feet of floor area of warehouse and industrial uses, or

25 guest rooms, or suites of rooms, in a hotel or motel, or

250,000 square feet of floor area in an arena, stadium, or multiplex theater, including a facility associated with an institution or educational facility, that does not have fixed seats, or

10,000 seats in an arena, stadium, or multiplex theater, including a facility associated with an institution or educational facility, or

250 students in any school, trade school, college, or university.

(b) When determining whether a Project is subject to the TDM Program, the Project shall be considered in its entirety. A Project shall not seek multiple applications for entitlements or building permits to evade the applicability of the TDM Program. Off-site parking areas which serve a Project shall be considered a part of the Project.

(c) Exemptions. The following Projects are exempt from Subsection 3(a) and the requirements of this Ordinance:

(1) Projects consisting only of the uses listed in Table 12.26 J.3.(c)(1).

TABLE 12.26 J.3.(c)(1): EXEMPT USES	
HOUSING	Alzheimers and Dementia Care Housing Assisted Living Community Care Facility Homeless Shelter Hospice Mobilehome Park Senior Living, including: Medical Care, Non-Medical Single-Family Dwellings including Small Lot Subdivisions Skilled Nursing Home
SPECIAL USES	Cemetery Certified Farmers' Market Day Care Facility Indoor Recreation, Commercial, such as Fitness Centers Kennel Nature Reserve Open Space, Public Outdoor Recreation, Commercial, including Golf Course Penal Institution Public Safety Facility Recreation, Public Religious Assembly Veterinary Care
AGRICULTURE, HEAVY COMMERCIAL, AND INDUSTRIAL	Animal Keeping Fleet Services Motor Vehicle Services, including: General, Car Wash, Commercial Vehicles, Fueling Station Plant Cultivation Recycling Facility Resource Extraction Salvage Yard Self-Service Storage Facility Solid Waste Facility Storage, Outdoor, including: Cargo Container, Official Motor Vehicle Impound, Standard Vehicle, Commercial Vehicle Utilities, including: Major, Minor, and Wireless Telecommunication

(2) Projects that meet the application or permitting milestones in Subsection 10 regarding phase-in of the Ordinance.

4. **Relationship to other Zoning Regulations.** Wherever the provisions of the Transportation Demand Management Ordinance conflict with any provisions of Supplemental Use Districts, specific plans, overlays or the base zone, the Transportation Demand Management Ordinance provisions shall prevail, unless exempt from new zoning regulations by a vested application or approval or explicitly specified in this ordinance.

(a) **Exception for Certain Specific Plans.** The TDM provisions of the Loyola Marymount University Specific Plan and the Warner Center Specific Plan shall prevail and not be superseded by this Ordinance, unless or until the Loyola Marymount University Specific Plan or the Warner Center Specific Plan is amended to defer to this Ordinance.

5. **Standards.**

(a) **General Requirements.** The City shall not issue a Building Permit or a Certificate of Occupancy for a Project that is not in compliance with the requirements of this Section.

(b) **Project Scale and Levels.** Requirements are scaled to the size and scope of a Project and have corresponding requirements as defined in Subsection 5(c). There are three Project Levels as defined in Table 12.26 J.5.(b). The Level applied to a Project is based on the new floor area, or the number of residential units, guest rooms, seats, or students added within the net new floor area. A Project that consists of multiple uses that result in different Project Levels shall be classified in the highest applicable Project Level.

TABLE 12.26 J.5.(b): PROJECT LEVEL THRESHOLDS			
	Level 1	**Level 2**	**Level 3**
	New, within the net new floor area:		
Housing (except as noted in the Affordable Housing section)	25-49 housing units	50-249 housing units	250 housing units or more
Affordable Housing	50 or more housing units, in which all units in the Project (exclusive of managers' units) are affordable dwelling units	N/A	N/A
Employment / Office	25,000-49,999 sf of floor area	50,000-99,999 sf of floor area	100,000 sf or more of floor area
Retail / Customer-Facing	50,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf or more of floor area
Medical Use / Hospital	50,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf or more of floor area
Warehouse / Industrial Space	25,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf of floor area
Hotel / Motel	25-99 guest rooms, or suites of rooms	100-249 guest rooms, or suites of rooms	250 or more guest rooms, or suites of rooms
Arena / Stadium / Multiplex Theater	N/A	250,000-499,999 sf of total floor area (no fixed seats), or with 10,000 to 19,999 seats	500,000 sf or more of total floor area (no fixed seats), or 20,000 or more seats
School, Trade School, College, or University (that requires building permits from the City of Los Angeles)	250 or more students	N/A	N/A

(c) **Project Requirements.** The Project shall be assigned a Point Target based on the applicable Project Level and amount of parking proposed for a Project. Table 12.26 J.5.(c) shows the Point Target range by Project Level. The TDM Program Guidelines describe the Point Target calculation and a menu of qualified TDM Strategies with corresponding point values.

Throughout the lifetime of the Project, the Project will select and implement enough TDM Strategies from the TDM Program Guidelines to meet or exceed its assigned

Point Target. The lifetime of the Project shall mean until such time as the Project is demolished, or such time as the project undergoes a change of use to a use and project size that is not subject to this Ordinance under Subsection 3(a) or to a use that is exempt under Subsection 3(c)(1), or such time as the Project is added to or replaced with a new Project that is subject to the TDM Ordinance. Compliance with the TDM Ordinance shall entail the following:

(1) The applicant shall submit a TDM Plan to LADOT for approval. The point value of the TDM Strategies selected for the TDM Plan shall add up to a minimum of the Project's required Point Target. No building permit shall be issued to a Project without an approved TDM Plan.

(2) LADOT shall review and approve or disapprove a TDM Plan within 30 days after the date of submission of a TDM Plan, or within 90 days if the TDM Plan includes any TDM strategies that need to be pre-approved by LADOT, Metro, or other authorizing agency as defined in the TDM Program Guidelines. Any submission by the Applicant of a revised TDM Plan will initiate a new period for LADOT review.

(3) The Project applicant shall execute and record a Covenant and Agreement that runs with the land, that an approved TDM Plan and the TDM Strategies contained therein will be maintained throughout the lifetime of the Project. A Project may apply to modify its TDM Plan pursuant to Subsection 5(d). No Certificate of Occupancy shall be issued to a Project without an approved TDM Plan and recorded Covenant and Agreement.

(4) The owner of a property that has a TDM Plan pursuant to this Section shall be responsible for implementing the TDM Strategies in the Project's approved TDM Plan throughout the lifetime of the Project. The Property Owner shall designate and maintain a TDM Coordinator who shall coordinate with the City on the Project's compliance with the approved TDM Plan. Membership to a Transportation Management Organization (TMO) may be used in place of a designated TDM coordinator.

(5) The owner of a property that has a TDM Plan pursuant to this Section shall submit annually to LADOT a TDM Plan Compliance Documentation that includes:
    (a) Documentation showing maintenance of the TDM Strategies in the Project's approved TDM Plan.

    The TDM Plan Compliance Documentation shall be submitted on or before the date of issuance of the Project's Certificate of Occupancy each year, with the first TDM Plan Compliance Documentation required one year after issuance of the Certificate of Occupancy. Upon confirmation by LADOT that the Project has submitted timely and complete TDM Plan Compliance Documentation

demonstrating compliance with the TDM Program for five consecutive years, the annual TDM Plan Compliance Documentation requirement may be waived. Required submission of annual TDM Plan Compliance Documentation may be reinstated by LADOT following any enforcement action related to noncompliance with the TDM Program.

(6) For Level 3 Projects, the property owner shall submit annually to LADOT a TDM Monitoring Report that includes monitoring data as defined by the Project's TDM Monitoring Data Collection Plan. The specifications of the TDM Monitoring Data Collection Plan shall be defined prior to issuance of a Certificate of Occupancy. Potential components of the TDM Monitoring Data Collection Plan are defined in the TDM Program Guidelines. Upon confirmation by LADOT that the Project has submitted timely and complete TDM Monitoring Reports for five consecutive years, the annual TDM Monitoring Report requirement may be waived. Required submission of annual TDM Plan Compliance Documentation may be reinstated by LADOT following any enforcement action related to noncompliance with the TDM Program.

(7) Level 3 projects shall install any technology that may be required by the TDM Monitoring Data Collection Plan. The technology shall comply with the LADOT privacy protocols described in Subsection 11, and shall be approved by LADOT to ensure compatibility with their monitoring methods.

TABLE 12.26 J.5.(c): PROJECT REQUIREMENTS

Project Level	Point Target Range	TDM Plan and Annual TDM Plan Compliance Documentation	TDM Monitoring Report
Level 1 Projects	15-25 Points	Required	Not Required
Level 2 Projects	20-30 Points	Required	Not Required
Level 3 Projects	25-35 Points	Required	Required

(d) **TDM Plan Modifications.** Any modifications to an approved TDM Plan require submission of a revised TDM Plan for approval by LADOT and payment of any fees required by Section 19.15 of Los Angeles Municipal Code. A TDM Plan shall comply with the TDM Program Guidelines version in effect at the time of submission and include TDM Strategies that achieve the property's Point Target. LADOT review of a TDM Plan Modification application shall follow the time limits set forth in Subsection 5(c)(2).

6. Administration.

(a) **Content of TDM Program Guidelines and TDM Calculator**. Upon enactment of this Ordinance, LADOT shall establish and maintain the TDM Program Guidelines, the TDM Calculator, and other necessary components of the TDM Program outlined in this Section. The TDM Program Guidelines and the TDM Calculator shall be consistent with the purposes of this Section and each other. The TDM Program Guidelines shall include the following:
(1) TDM Program goals and benefits;
(2) TDM Point Targets by Project Level and parking supply;
(3) TDM Strategies and their associated point values;
(4) TDM evaluation metrics and reporting requirements; and
(5) The technical justification for assigned point values for each TDM Strategy.

(b) **Updates to TDM Program Guidelines and TDM Calculator**. The General Manager of LADOT may update the TDM Program Guidelines and TDM Calculator to:
(1) provide feasible options to applicants to meet program goals and outcomes; and
(2) reflect best practices, emerging technologies, and/or respond to lessons learned from monitoring and evaluation.

(c) **Effect of Updates on Project Requirements.** Projects shall meet all requirements of the TDM Program Guidelines version in effect at the time when submitting their first TDM Plan, including but not limited to the designated Point Target and available TDM Strategies. If LADOT updates the TDM Program Guidelines subsequent to the date the applicant submitted a TDM Plan, the applicant may elect to have their Project be subject to all requirements of the current version of the TDM Program Guidelines by submitting a TDM Plan Modification for approval.

7. Monitoring and Enforcement. LADOT shall be responsible for enforcing continual compliance with the requirements of the TDM Program, as outlined below.

(a) Any property owner failing to comply with the mandatory requirements of the TDM Ordinance shall be subject to an infraction charged by the City Attorney. Section 11.2.03 of this Code shall govern the issuance of administrative citations for administrative and continuing violations as an alternative to other legally available civil and criminal remedies that apply to code violations. Section 11.2.04 (b) of this Code shall govern administrative fines to be paid for violations of the code. In instances where the fines specified below exceed those that can be recovered under Section 11.2.04 (b), the fines in this Section shall prevail. If the issuance of administrative citations fails to result in compliance with the mandatory requirements of the TDM Ordinance, the City Attorney reserves the right to charge any property owner who fails to comply with any of the mandatory requirements of this Code as guilty of a misdemeanor as governed by Section 11.00(m).

(b) A property owner shall allow City staff access to relevant portions of the property to conduct site visits, inspect physical improvements, collect empirical data, and/or facilitate phone, and/or digital surveys with residents, tenants, employees, and visitors. City staff shall provide advance notice of request for access.

(c) No building, grading, demolition, foundation, use of land or change of use permit, nor Certificate of Occupancy, shall be issued for any building or site that contains a Project that is not in compliance with the requirements of the TDM Program.

(d) Failure to submit TDM Plan Compliance Documentation annually, beginning no sooner than one year after the issuance of the Certificate of Occupancy, on a date specified by the TDM Program Guidelines, shall result in the issuance of a Notice to Comply. A failure to adequately respond within 30 days of the issuance of the Notice to Comply shall result in a $250 penalty per day of non-compliance with the requirement to submit a TDM Plan Compliance Documentation.

(e) Failure to maintain one or more TDM Strategies in the approved TDM Plan shall result in the issuance of a Notice to Comply. A failure to adequately respond within 30 days of the issuance of the Notice to Comply shall result in a $250 penalty per day of non-compliance, and shall escalate for subsequent offenses in accordance with Section 11.2.04 (b) of this Code, for each required TDM Strategy that is included in the TDM Plan and that LADOT finds to be out of compliance.

(f) For Level 3 projects, failure to submit the TDM Monitoring Report annually, beginning no sooner than one year after the issuance of the Certificate of Occupancy, on a date specified by the TDM Program Guidelines, shall result in the issuance of a Notice to Comply. A failure to adequately respond within 30 days of the issuance of the Notice to Comply shall result in an initial $2,500 penalty for a first violation. If the violation continues to not be resolved an additional $2,500 penalty shall be assessed for each additional 30 days that the Project is in non-compliance with the requirement to submit a TDM Monitoring Report.

(g) If failure to submit reporting requirements results in an on-site visit by City staff to investigate the site's compliance with the TDM Program, a $2,500 penalty shall be charged to the property owner, in addition to any penalties for non-compliant TDM Strategies.

8. User-Defined TDM Strategy.

(a) **Alternative Compliance - Director's Authority.** A User-Defined TDM Strategy as an alternative to those strategies contained in the menu of TDM Strategies in the

TDM Program Guidelines may be requested in accordance with Sec. 13B.5.1. (Alternative Compliance) of Chapter 1A of this Code.

(1) **Initiation.** An applicant may initiate an application for Alternative Compliance for a User-Defined TDM Strategy by filing an application with the Department and paying a filing fee equivalent to that established for a "Miscellaneous Clearance - Director" as set forth in Section 19.04 of this Code and a "Technical Study" fee as set forth in Section 19.15 of this Code.

(2) **Consultation.** The Director or the Director's designee shall consult with LADOT during consideration of an application for a User-Defined TDM Strategy.

(3) **Conditions.** The Director shall impose conditions binding on the applicant to secure substantial compliance with the goals and purposes of this ordinance, including such conditions as are necessary to ensure that:
   (a) The applicant commits in an enforceable agreement that runs with the land to monitor the effectiveness of the User-Defined TDM Strategy to encourage alternatives to drive-alone trips;
   (b) The applicant shall submit to LADOT all monitoring data, with monitoring metrics and frequency to be determined at the discretion of LADOT; and
   (c) The applicant commits to a substitute TDM Strategy or Strategies of commensurate effectiveness (a Strategy assigned equal or more points) if the User-Defined TDM Strategy is terminated for any reason.

(4) **Findings.** In addition to the findings required by Sec. 13B.5.1. (Alternative Compliance) of Chapter 1A of this Code, in approving an Alternative Compliance for a User-Defined TDM Strategy, the Director or Area Planning Commission (on appeal) shall find that:
   (a) The proposed alternative is expected to reduce drive-alone trips and/or vehicle miles traveled (VMT) to and/or from the project site, and the amount of drive-alone trips and/or VMT reduced as a result of the User-Defined TDM Strategy will be commensurate with other TDM Strategies that are assigned to have a comparable value of points in the TDM Program Guidelines.

9. Hardship Exemption. In cases of extreme hardship, duly established to its satisfaction, the City Council, acting in its legislative capacity, and by resolution, may grant an exemption from any or all the provisions of this ordinance. In granting such an exemption, the City Council shall make the following findings:

(a) Specific features of the development make it infeasible to satisfy all of the provisions of this Section; and

(b) The applicant has committed to provide equivalent alternative measures to reduce vehicle trips.

10. **Phase In.** Projects that have reached certain application or approval milestones by specified dates shall be exempt from the provisions of this Ordinance, as follows:
    (a) Projects for which a land use approval, including, if applicable, an active Development Agreement, was obtained from the City for the activity prior to the effective date of this Ordinance and the land use approval is still valid;
    (b) Projects for which a preliminary application has been submitted to the City pursuant to Government Code Section 65941.1, or for which an application has been deemed complete by the City pursuant to Government Code Section 65943, on or before the effective date of this ordinance;
    (c) Projects for which a Notice of Completion for a Draft Environmental Impact Report has been circulated, on or before the effective date of this ordinance;
    (d) Projects that have vested rights pursuant to LAMC Section 12.26.A.3, on or before the effective date of this ordinance;
    (e) Level 2 and Level 3 Projects that receive a building permit within 180 days after the effective date of this Ordinance;
    (f) Level 1 projects that receive a building permit within 365 days after the effective date of this Ordinance.

11. **Privacy Protocols.** City staff shall use the most current and restrictive privacy protection policies to protect personal privacy during site visits and in the use of data collected during the monitoring process. The City will apply protection standards to all monitoring data obtained about a Project to protect any personally identifiable data of building occupants and visitors. The City's protection standards include data minimization, access limitations, data categorization, security, and transparency for the public.

12. **Severability.** If any part or provision of this ordinance is found to be unconstitutional or otherwise invalid by any court of competent jurisdiction, the remainder of this ordinance, including the application of such part or provisions to other persons or circumstances, shall not be affected by such holding and shall continue in full force and effect, and to this end, the provisions of this ordinance are severable.

EXHIBIT B:
Draft TDM Program Guidelines

CPC-2021-3141-CA, ENV-2013-0911-EIR-ADD3

For consideration by the City Planning Commission

September 22, 2022

Transportation Demand Management (TDM) Program Guidelines

September 2022 DRAFT

LADOT

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LADOT
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DeJanea Williams
Jacob Wasserman

Department of City Planning
Vincent P. Bertoni, Director of Planning
Arthi Varma
Ken Bernstein
Nicholas Maricich
Conni Pallini-Tipton
Claire Bowin
Emily Gable
Cameron Phillips
Jonathan Ayon
Qiuana Williams

Mayor's Office
Daniel Rodman
Stacy Weisfeld

Report Co-Authors

State Smart Transportation Initiative
Eric Sundquist
Chris McCahill

LA Metro
Jacquilyne Brooks de Camarillo
Aaron Voorhees
Mark Vallianatos
Robin O'Hara
Devon Demming
Martin Buford
Neha Chawla
Shine Ling
Joshua Schank
Eric Houston
Jacob Lieb

The Technical Advisory Committee
Los Angeles Mayor's Office
Southern California Association of Governments (SCAG)
South Coast Air Quality Management District
Los Angeles County of Public Health
City of Santa Monica
City of Culver City
City/County of San Francisco
City of West Hollywood
City of Pasadena
Personnel Department, Employee Benefits
UCLA Lewis Center
USC Bedrosian Center
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Creighton Randall
Makenzi Rasey
Rani Narula-Woods
Brian Holland
Mary Ferguson

Draft Program Guidelines

Contents

Executive Summary 6

Preface 7

Overview 8

Chapter 1: Introduction 9
- 1.1 Development of Transportation Demand Management (TDM) Program 9
- 1.2 Transportation Demand Management in Los Angeles 10
  - 1.2.1 Alignment with Mobility Plan 2035 10
- 1.3 Transportation Demand Management and California Policy 11
- 1.4 Outreach 12

Chapter 2: Program Goals and Benefits 14
- 2.1 Program Goals 14
  - 2.1.1 Transportation System Efficiency 14
  - 2.1.2 Environmental and Pulic Health Outcomes 14
  - 2.1.3 Equity 14
  - 2.1.4 Transportation Happiness 15
  - 2.1.5 Universal Basic Mobility 15
  - 2.1.6 Context Sensitive Approach 15
  - 2.1.7 Adaptive 15
  - 2.1.8 Streamlined Project Review and Monitoring 15
  - 2.1.9 Effective Program Evaluation 15

Chapter 3: Applicability, Levels, and Point Targets 16
- 3.1 Applicability 16
  - 3.1.1 Land Use Categories 16
  - 3.1.2 Exemptions: Small Development Projects 16
- 3.2 Project Levels 17
  - 3.2.1 Residential and Commercial Projects 18
  - 3.2.2 Mixed-Use Projects 18
  - 3.2.3 Affordable Housing Projects 18
- 3.3 Point Targets 20
  - 3.3.1 Base Point Target 20
  - 3.3.2 Parking's Effect on the Point Target 20
  - 3.3.3 Calculating Point Targets 21

Chapter 4: Qualified TDM Strategies 22
- 4.1 Evaluating the Effectiveness of TDM 22
  - 4.1.1 Literature Review 22
- 4.2 Menu of Qualified TDM Strategies 22

Draft Program Guidelines

4.2.1 Strategy Applicability 22
4.2.2 Strategies Not in Compliance 22
4.2.3 User-defined TDM Strategies 23
4.2.4 TDM Strategies Described 23
4.3 TDM Packages 39

Chapter 5: Compliance & Monitoring 41
5.1 Compliance & Monitoring Requirements 41
5.1.1 TDM Plan 41
5.1.2 TDM Plan Compliance Documentation 42
5.1.3 TDM Monitoring Report 42
Travel Surveys 42
Parking-Hour Utilization 43
5.1.4 Site Enforcement 43
SCAQMD Rule 2202 and Employment Uses 43
5.1.5 Transportation Management Organizations (TMOs) 44
5.1.6 Review Fees 44
5.2 Non-Compliance 44
5.3 Penalties 44

Chapter 6: TDM Program Updates 46
6.1 Program Evaluation and Amendments 46
6.1.1 TDM Strategies 46
Future TDM Strategies 46
6.1.2 Future Amendments 47

Appendix A: Glossary of Common Terms 48

Appendix B: Findings from Planning Studies and Literature 51

Appendix C: Summary of TDM Strategies 68

Appendix D: Compliance & Monitoring Materials 79

Appendix E: Transportation Management Organization (TMO) Certification Guidelines 90

Draft Program Guidelines

Executive Summary

Angelenos want mobility solutions that are good for the planet and create more enjoyable travel experiences. Prior to the COVID-19 pandemic, about 70 percent of all commute-based trips were made by people driving alone.[1] With just two or three percent fewer cars on the road, congestion delays could be reduced by 10 to 15 percent.[2] By switching a few drive alone trips to more sustainable ways of getting around we can improve the transportation user experience and reduce greenhouse gas emissions to create safer, healthier communities.

The Department of City Planning (DCP) and City of Los Angeles Department of Transportation (LADOT) have collaborated to develop a Transportation Demand Management (TDM) Program as a set of solutions to encourage more sustainable development and support growing transportation options for all Angelenos. The TDM Program incorporates sustainable transportation options into the design of new developments to provide more mobility choices to residents, employees, and visitors. As Los Angeles continues to grow, TDM will responsibly address transportation needs and increase the efficiency of our transportation system by encouraging sustainable modes of transportation through specific strategies integrated into new development. This program is a priority as indicated in the City's policy and guidance documents including the Mobility Plan 2035, LA's Green New Deal, and the LADOT Strategic Plan. The TDM Program addresses challenges Angelenos face today, like congestion, air quality, and difficulty in accessing jobs and services through solutions that are good for the environment and good for Angelenos for generations to come.

[1] U.S. Census. 2019 ACS 5-Year Estimates Subject Tables. https://data.census.gov/
[2] Sorensen, Paul [et al.] 2008. Moving Los Angeles: Short-Term Policy Options for Improving Transportation. The RAND Corporation. Page xxiv.

Draft Program Guidelines

Preface

The City of Los Angeles ("City") is home to about 4 million residents, provides more than 1.7 million jobs, and, in 2018, attracted more than 50 million domestic and international visitors.[3] These numbers are expected to continue growing significantly - the City is estimated to gain an average of 35,000 new residents and 36,000 jobs each year.[4]

Today, congestion delays in the Los Angeles metropolitan area rank at or near the worst in the nation.[5] A major contributor is the number of drive alone trips that make up the largest proportion of commute trips, which was 69.6 percent in Los Angeles just prior to the COVID-19 pandemic.[6] Los Angeles has tried to solve congestion with supply-side solutions, such as widening streets and freeways to create new travel lanes. These types of investments have been found to be ineffective at reducing congestion[7] and have led to unsafe outcomes for pedestrians and bicyclists.[8] Plus, in a built-out city, there is simply no more space to continue widening roadways. Los Angeles is currently investing billions into expanding the transit and active transportation networks to accommodate our growing transportation demands. But to be effective, policies must also focus on the demand side to ensure residents and visitors can use expanding transportation infrastructure and services more efficiently, safely, and sustainably. Simply put - if the majority of Angelenos continue to drive alone for most trips, our system is not sustainable. We need solutions that are good for Angelenos and good for the environment.

The City's Transportation Demand Management (TDM) Program update directly addresses the City's immense transportation demands by offering new development tools to design mobility options as part of a building's features. A diverse menu of strategies offers mobility strategies that residents, employees, and visitors can use to make more sustainable transportation choices. These strategies reduce vehicle miles traveled (VMT) and decrease drive alone trips. The strategies make more efficient use of streets and the growing transit networks to improve access to destinations for all Angelenos. By improving mobility options for a growing city, the TDM Program can work to promote active and healthy lifestyles and reduce harmful greenhouse gas (GHG) emissions.

The South Coast Air Quality Management District (South Coast AQMD) imposes emission reduction requirements on large employers subject to Rule 2202. The City's TDM Program does not alter those regulations or their means of compliances. Rather, the TDM Program update applies to significant, new developments and major additions, including those that may require analysis under the California Environmental Quality Act (CEQA). The Program seeks to maximize transportation options in and around these developments to allow the City to simultaneously absorb new residents, jobs and commercial activity, improve access to destinations and services, and improve quality of life.

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[3] Los Angeles Times. "Los Angeles County hosts a record 50 million visitors in 2018." January 16, 2019.
[4] Population estimate from one-year ACS data for 2010-15; employment estimate from California Employment Development Department 2011-6.
[5] INRIX, Urban Mobility Scorecard, 2015.
[6] U.S. Census. 2019 ACS 5-Year Estimates Subject Tables. https://data.census.gov/
[7] Office of Planning and Research, "Technical Advisory on Evaluating Transportation Impacts in CEQA". December 2018.
[8] Vision Zero Los Angeles. "Safety Study for Los Angeles". January 2017

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Overview

This document provides a program description and additional requirements and processes to support the update to the Los Angeles Municipal Code Section 12.26 J, the Transportation Demand Management (TDM) Ordinance. This TDM Program Guidelines document consists of five chapters, Appendices A through D, and a TDM Calculator. All documents are on the City Planning Mobility website. If the program is approved by the LA City Council, the documents and Calculator will transition to their permanent home on the LADOT Development Review website.

Chapter 1 defines TDM, describes the TDM Program in Los Angeles, and explains how the TDM Program advances the City's vision for mobility, as set forth in the Mobility Plan 2035 and transportation, air quality, and climate action policy objectives.

Chapter 2 describes the goals of the TDM Program and details how achieving these goals will result in better public health, improved quality of life, a streamlined project review process, and additional benefits for property owners, employers, employees, residents, and visitors.

Chapter 3 defines the types of development projects subject to and exempt from the TDM Program, establishes a three-leveled system for categorizing development projects that must comply with the TDM Program, and instructs applicants or owner/tenants how to calculate Point Targets.

Chapter 4 summarizes the best practice research that informed the selection of qualified TDM strategies for this program, assigns point values to each strategy, and describes each strategy in depth. It also describes alternative methods for compliance for projects that propose new or innovative approaches beyond the list of qualified strategies.

Chapter 5 provides information on monitoring and evaluation efforts.

Appendix A is a glossary of common terms used throughout this document.

Appendix B summarizes key findings and statistics from relevant planning case studies and empirical research. These findings demonstrate the effectiveness of qualified TDM strategies at reducing vehicle miles traveled and achieving other desired outcomes outlined in this Program Guidelines.

Appendix C is a summary of all TDM strategies.

Appendix D includes the forms required for compliance with the TDM Program.

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Chapter 1: Introduction

This document describes the City of Los Angeles Transportation Demand Management Program (TDM Program) and provides the structure, requirements, and strategies for compliance developed to supplement Section 12.26 J of the Los Angeles Municipal Code (LAMC), the Transportation Demand Management Ordinance. This chapter describes the research, analysis, and outreach City staff conducted to develop the TDM Program and defines how the implementation of the Program will advance local, regional, and state policy objectives.

1.1 Development of Transportation Demand Management (TDM) Program

TDM describes strategies that improve the efficiency of the transportation network by providing infrastructure, services, programs, and information that support the use of sustainable travel options. TDM includes a broad range of activities that may effectively improve access to destinations, while reducing the number of people who drive alone to work or other destinations. Strategies can range from improved transportation options, to education and incentive programs that make it easy to plan and choose multi-modal journeys, to mixed-use site design that brings common destinations closer to people. The full list of TDM strategies is outlined in Chapter 4.

Mobility solutions that are the most visible to the public often focus on the supply of transportation infrastructure—increasing the capacity of infrastructure for driving, walking, bicycling, and riding transit—like expanding highways, widening roads, or building new transit lines and active transportation infrastructure. Limited opportunities exist to continue increasing roadway capacity in built-out cities like Los Angeles, necessitating investments in sustainable infrastructure that move more people in less space, and effective management of travel demand to accommodate future development and economic growth in the region.

TDM strategies that focus on changing transportation behavior through incentives are generally less visible than large scale infrastructure projects; however, they can be incredibly effective by focusing on the demand for transportation—shifting travel to sustainable modes that improve efficient use of infrastructure. TDM strategies can have a cumulative impact on travel demand to enable existing transportation facilities to be more accessible. For instance, a TDM strategy that improves transit frequencies or introduces a new neighborhood shuttle, moving more people in less street space than personal vehicles, relieves excessive demand for auto use, improves functionality, and provides new mobility services that can serve more customers more effectively. This shift reduces roadway congestion and supports the environmental and sustainability goals of the City.

Employers have long used TDM strategies to incentivize their employees to commute sustainably to reduce congestion and parking demand, and meet compliance with regulatory trip reduction targets, like South Coast AQMD's Rule 2202. Some employers have formed transportation management organizations (TMOs) or hired an employee transportation coordinator (ETC) to coordinate TDM options offered in the workplace. TDM programs implemented by large employers that must comply with regional TDM requirements have demonstrated the effectiveness of these policies throughout the region.

The development of the Los Angeles TDM Program, similar to relevant examples in other jurisdictions, applies holistic citywide TDM policies that can reduce congestion, improve accessibility for people using sustainable modes, decrease monetary and opportunity costs of parking, improve air quality, and offer more mobility options to communities. These concepts were based on extensive research, analysis, review of best practices, and collaboration with local and national experts.

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City staff initiated a TDM technical advisory committee with local experts to inform program development and coordination between agencies. Staff interviewed approximately 15 local TDM Program coordinators and TMOs where they reflected on challenges, opportunities, and lessons learned in administering TDM for their constituent organizations. City staff also coordinated with national TDM experts, attended TDM-related conferences, and participated in numerous webinars that provided insight into the latest TDM implementation strategies and practices. The feedback collected from these efforts informed program development and include the following key takeaways:

- TDM is important to attract and retain talent
- Solutions should be context-sensitive and also consistent with a regional approach
- Successful TDM programs are often the result of compelling marketing and education components along with strong executive buy-in
- Effective motivational strategies can include gamification and personalized trip-making or matching
- Large developments provide great opportunities to establish and monitor TDM
- Programs should be flexible and adaptive in response to ongoing monitoring and reporting
- Programs should be regularly updated to keep up with innovation and technology

1.2 Transportation Demand Management in Los Angeles

In 1993, the City adopted its first citywide TDM Ordinance to comply with the State Legislature's directive for local jurisdictions to connect regional transportation planning to community growth, land use, and air quality decisions. This ordinance is limited in scope and no longer serves the City's growing population and immense mobility needs. The prescriptive TDM strategies in the 1993 ordinance reflect the more limited mobility options available at that time. Program monitoring and evaluation were not a component of the original ordinance.

The proposed update to the TDM Ordinance captures additional land uses, acknowledges the proliferation of sustainable transportation options in the City of Los Angeles, considers the benefits of incorporating new transportation technology innovations, examines diverse travel preferences, and establishes performance monitoring and enforcement as an integral component of the TDM Program.

1.2.1 Alignment with Mobility Plan 2035

The TDM Program update is an implementation program outlined in the Mobility Plan 2035 (The Plan), the adopted Transportation Element of the City's General Plan. The Plan's comprehensive approach to mobility addresses the challenges of "environmental constraints, public health issues, regional inequity, and some of the longest traffic delays in the nation."[9] Specifically, this TDM Program advances the Plan goal of fostering collaboration, communication, and informed choices citywide by implementing Policy 4.8, which aims to "encourage greater utilization of TDM strategies to reduce dependence on driving alone."[10]

The Plan acknowledges that the majority of all commute trips in the City (67 percent when the Plan was prepared) are made as drive alone trips. Mirroring a national trend, the percentage of commuters who carpool to work has been steadily declining since the 1970s. High rates of drive alone trips contribute to roadway congestion, cause delays for millions of people, and lead to a host of other negative side effects including degraded air quality and health outcomes. The Plan identifies TDM as a solution that "can reduce the percentage of commuters who drive

[9] Mobility Plan 2035, p. 13.
[10] Ibid, p. 109.

alone by raising awareness of available alternatives and by offering incentives to make those alternatives more attractive."

The multimodal transportation vision set forth in the Plan relies on reducing demand for drive alone trips and VMT in the City, while improving accessibility to destinations. The menu of TDM strategies aims to shift trips from driving alone in personal vehicles to more sustainable travel options. Many of the TDM strategies outlined in Chapter 4 of this document originate in the Plan,[11] including the following:

- The TDM Program considers "the strong link between land use and transportation" by requiring new developments to incorporate TDM strategies appropriate to their built-environment context, in part to encourage infill development in dense, diverse parts of the City, thereby reducing drive alone trips.[12]

- The TDM Program aims to improve people's experience when choosing alternatives to drive alone trips, including walking and biking. The Plan relies on convenient, non-motorized travel choices, pointing out that "even a relatively minor incremental shift in mode choice can yield large rewards." The recent emergence of dockless micro-mobility solutions including electric scooters and bicycles also provides additional options as a first-last mile solution to transit. The Plan notes that 47 percent of trips in the City are shorter than three miles, a length that could be easily traveled on foot or by bicycle, but 84 percent of such trips are currently made by car.[13]

- The TDM Program allows projects to offset the travel demand generated at the site by constructing or contributing to complete streets. The Plan "seeks to prioritize resources to transform and maintain our streets as complete streets that serve all users, now and into the future."[14] The Plan calls for street design and operations that prioritize the comfort and safety of the most vulnerable street users. These street safety improvements influence social equity and shifts in travel behavior. Goals include increasing bicycling among women, who have been found to be more discouraged by safety concerns than men, and adding pedestrian safety improvements in disadvantaged areas of the City,[15] which have been found to disproportionately be affected by traffic fatalities and severe collisions. Nearly half of the Vision Zero designated High Injury Network (HIN) corridors fall within the most vulnerable communities in Los Angeles.[16]

1.3 Transportation Demand Management and California Policy

Under California Senate Bill 743 (SB 743), signed into law September 27, 2013, local jurisdictions are required to revise their transportation impact assessment methodology. In doing so, localities must follow the Office of Planning and Research (OPR) proposed transportation impact analysis guidelines, pursuant to the California Environmental Quality Act (CEQA). Based on empirical evidence presented in OPR's January 2016 guidelines, the updated final guidelines released in November 2017, the final guidelines released in December 2018, and an independent literature review by City staff, the City concluded that establishing vehicle miles traveled (VMT) as the basis for transportation impact significance criteria for projects will reduce air emissions and greenhouse gasses,

[11] Ibid, p. 109.
[12] Ibid, p. 11
[13] Ibid, p. 32, 63
[14] Ibid, p. 32.
[15] Mobility Plan 2035, p. 79.
[16] Vision Zero Los Angeles Fact Sheet, p. 2.

promote the expansion of a multimodal transportation system, and mitigate other environmental problems relative to a vehicle delay-based transportation impact criteria.

On July 30, 2019, the City of Los Angeles adopted new transportation assessment methodologies and thresholds using VMT, safety, and accessibility metrics. The revised evaluation methods under CEQA determine the environmental outcomes of new developments from VMT estimates that factor in the location and characteristics of the development and require developments to mitigate projected VMT above the significance threshold. However, even developments estimated to generate low VMT and developments that implement mitigation programs are likely to produce drive alone trips, a heavy reliance on the local street system, and demand for parking. The City's TDM Program will require new developments to implement strategies that minimize the reliance on auto activity to and from and in the vicinity of the development.

Beyond SB 743 compliance, the TDM Program complements or supports additional State policy objectives:

- California's Complete Streets Law, Assembly Bill 1358 (2008), declares it is State policy "to shift from short trips in the automobile to biking, walking, and use of public transit,"—a key benefit of the City's TDM Program.
- The California Department of Transportation (Caltrans) Strategic Management Plan calls for tripling bicycle mode share and doubling pedestrian and transit mode shares, compared with 2010-12 baselines, and for reducing statewide VMT.[17]
- South Coast Air Quality Management District's Rule 2202, adopted in 1995 with subsequent amendments, requires employers with worksites of 250 or more employees to manage drive alone commute trip demand.[18]
- Assembly Bill 2548[19] (Friedman, 2018) authorized LA Metro to adopt, and revise as necessary, a commute benefit ordinance that requires employers operating within the authority's area with a specified number of employees to offer certain employees commute benefits.

1.4 Outreach

City staff conducted an outreach process that built public awareness around adopting a new framework that guides transportation-related growth and development decisions. The update to the TDM Program was introduced as part of the effort to comply with SB 743. Public engagement started in 2017 and public open houses were held in winter 2018. Staff introduced the TDM Program to a variety of stakeholders including neighborhood groups, interest groups, non-profit organizations, practitioners and governmental agencies through presentations and discussions. Following the outreach process, the TDM Program was developed taking into consideration the guidance and feedback received from a technical advisory committee (TAC) of TDM experts and briefings with stakeholders. Interviews with local businesses, employers, agency partners, and transportation management organizations further supplemented the outreach effort to inform the TDM Program development. Citywide, approximately 1,800 people participated in the outreach process as of April 2020.

Drafts of the proposed TDM Ordinance, TDM Program Guidelines, and TDM Calculator were shared with the public in June 2021. Webinars, office hours, and public presentations engaged over 330 people in Summer 2021. An open house and public hearing are planned for Summer 2022 to share information and solicit feedback. The Ordinance is

[17] Caltrans Strategic Management Plan, 2015-2010, p. 11.
[18] South Coast Air Quality Management District. "Rule 2202 - On-Road Motor Vehicle Mitigation Options". Amended June 6, 2014.
[19] https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2548

expected to be reviewed by the City Planning Commission and the Transportation and Planning and Land Use (PLUM) Committees of the City Council before being considered by the full City Council for approval.

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Chapter 2: Program Goals and Benefits

This chapter describes the goals of the TDM Program and details how achieving these goals will result in improved air quality and public health outcomes, more affordable travel options, reduction of transportation-related collision risk, an improved user experience, and other indirect benefits.

2.1 Program Goals

The main goal of the TDM Program is to provide more transportation options to improve accessibility to destinations and reduce drive alone trips. The TDM Program is part of the City's comprehensive approach to mobility, which seeks to accommodate growing mobility needs by reforming transportation impacts analysis methods, maintaining safe and efficient transportation networks, and delivering world-class infrastructure.

The TDM Program will help residents, employees, and visitors to minimize their reliance on vehicular travel by reducing drive alone trips and VMT generated from new developments and surrounding communities. The program includes TDM strategies that can incentivize sustainable travel options that reduce and shorten vehicle trips. Ultimately, this effort can achieve a more efficient use of our transportation infrastructure, reduce transportation related GHGs, and improve quality of life through the following objectives:

2.1.1 Transportation System Efficiency

The TDM Program is designed to reduce reliance on drive alone trips and encourage sustainable modes of transportation. Improved transportation system efficiency can help to move more people in the same amount of space, with fewer negative externalities. TDM creates capacity for vehicular travel by people with few other alternatives, deliveries of goods and services, and transit services. A more efficient parking system will reduce the amount of dedicated space and costs associated with storing personal vehicles while maintaining access to places people need to go.

2.1.2 Environmental, Public Health, and Wellness Outcomes

The TDM Program is designed to produce shifts to sustainable modes of transportation. Shifting travel to sustainable modes of transportation has many benefits, including reducing VMT, transportation costs, opportunity costs[20], improving air quality, public health, and wellness. An example includes reduced driving and increased time for exercise and family bonding as a result of working from home.

2.1.3 Equity

Historically, LADOT, like many transportation agencies over the last century, focused investments and made decisions that prioritized improving vehicular speeds at peak hours of the day. This focus tended to emphasize the travel needs of workers that reside in outer-lying communities over the needs of the communities they drove through. The communities that suffered from these types of policies lack a diverse array of accessible, affordable, reliable, and safe travel options. These communities also tend to be lower income communities of color that have been disproportionately affected by traffic violence and poor health outcomes as a result of pollution. The TDM Program can help rectify the historic inequities by providing more travel options and services that restore dignity to the travel experience. LADOT will continue to evaluate ways to expand dignified transportation options for all,

[20] Examples of opportunity cost include personal time that could be used more productively and urban space devoted to driving or parking, which reduces land available for livability and open space.

reduce the need to drive alone, and support investment decisions that increase the quality and availability of mobility infrastructure and services in communities that have been disproportionately impacted by past policies and practices.

2.1.4 Transportation Happiness

Transportation happiness is a method of evaluating transportation projects and operations that goes beyond the traditional focus on cost-benefit or travel time. Instead, it considers the quality of the experience, dignity, and well-being of travelers. Evaluating additional metrics like quality of service, the customer experience, and mode choice availability will bring about services that are useful, usable, desirable, findable, accessible, and credible.[21] As a policy objective, transportation happiness can contribute to a strong transportation system that provides many dignified options, focuses on the user experience, and leads to quality of life outcomes.

2.1.5 Universal Basic Mobility

Universal Basic Mobility (UBM) is a concept that everyone should have access to reliable, affordable, dignified transportation. TDM can improve transportation options and therefore, access to opportunity.

2.1.6 Context Sensitive Approach

The TDM Program is designed to meet the needs of diverse communities, geographies, and development project types by offering choices that take into account varying land use and transportation conditions. Applicants may also suggest new strategies for consideration. A flexible approach can result in context sensitive solutions citywide.

2.1.7 Adaptive

A program that monitors and updates TDM strategies over time will result in a more adaptive and responsive program. New technologies, innovations in the mobility marketplace, and solutions for evolving travel preferences necessitate an adaptive approach. Strategies may also be altered to reflect geographic context. An adaptive TDM Program will serve people and neighborhoods with mobility solutions that lead to the greatest public benefit.

2.1.8 Streamlined Project Review and Monitoring

TDM Program requirements are designed to be user-friendly in compliance, monitoring, and evaluation. A streamlined project review process offers developers, employers, and property owners the flexibility to select strategies from a diverse pool of options that consider varying geographic and transportation conditions. The TDM Program provides a clear and predictable process to obtain project approval, and opportunities to update the selected strategies, should monitoring and evaluation demonstrate a need for adjustment. Regular project performance monitoring and program evaluation ensures a transparent process that is efficient for all parties.

2.1.9 Effective Program Evaluation

The TDM Program prioritizes the collection of valuable data, which will help demonstrate the long-term efficacy of strategies in achieving program goals. Data can improve the program over time and inform future transportation and land use planning decisions.

[21] Urban Mobility in a Digital Age. "Transportation Happiness". August 2016

Chapter 3: Applicability, Levels, and Point Targets

This chapter defines the types of development projects subject to the TDM Program, establishes a tiered system for categorizing new development projects that must comply with the TDM Program, and describes Point Target calculations. These requirements are codified in the Los Angeles Municipal Code (L.A.M.C.) 12.26 J. The TDM Calculator, an online application, is available to assist applicants in determining which TDM program requirements apply to a particular project site. The TDM Calculator is accessible on the LADOT website.

3.1 Applicability

3.1.1 Land Use Categories

The TDM Program applies to new development projects and major additions above the minimum size threshold that are likely to generate an incremental increase in VMT and drive alone trips. New development projects and major additions that are constructing new floor area including, but not limited to, office employment, housing, industrial/warehousing, schools, retail, restaurant, and/or hotels are subject to the TDM Program. These land-use categories generate the majority of vehicle travel in the City and are included in trip generation and parking demand standard manuals.[22] Mixed-use projects that include a mix of these land uses are also subject to the TDM Program. Mixed-use projects can typically demonstrate partial mitigation of drive alone trips by design. A combination of land uses on a single project site improves walkability and land use diversity, allowing users to reduce the need for an additional trip to conduct errands.[23] The list of qualified TDM strategies, outlined in Chapter 4, can be applied to proposed development projects of all land use types.

3.1.2 Exemptions: Small Development Projects

New development projects and additions that do not add significant floor area dedicated to employment, housing, retail, mixed-uses, or special uses are exempt from the requirements of the TDM Program. Also, any building alteration or change of use that does not add new floor area is exempt from the requirements of the TDM Program. Small projects generate relatively low demand for drive alone trips and generally lack the management capacity to adequately administer and measure the effectiveness of TDM strategies. The TDM Program does not apply to projects that meet all of the following criteria:

1. adds fewer than 25 housing units,
2. adds fewer than 50 housing units in which all units in the Project (exclusive of manager's units) are affordable dwelling units
3. adds less than 25,000 square feet (sf) of non-warehouse/non-industrial employment or office floor area,
4. adds less than 50,000 sf of retail or medical use floor area,
5. adds less than 25,000 sf of warehouse/industrial floor area,
6. adds fewer than 25 guest rooms, or suites of rooms, in a hotel,
7. adds arena(s), stadium(s), or theater(s) of fewer than 10,000 total seats, and less than 250,000 sf of total floor area,
8. adds charter or private school(s) of fewer than 250 total students, and
9. any project that consists only of the uses listed in Table 1 below.

[22] ITE trip generation manual, ITE parking manual
[23] Smart Growth America. "Mixed-Use Trip Generation Model". Accessed June 2018.

Draft Program Guidelines

Table 1. Exempt Uses

Housing:	Alzheimers and Dementia Care Housing Assisted Living Community Care Facility Homeless Shelter Hospice Mobilehome Park Senior Living, including: Medical Care, Non-Medical Skilled Nursing Home
Special Uses:	Cemetery Certified Farmers' Market Day Care Facility Kennel Gym Nature Reserve Open Space, Public Outdoor Recreation, Commercial, including Golf Course Penal Institution Public Safety Facility Recreation, Public Religious Assembly Veterinary Care
Agriculture, Heavy Commercial, and Industrial:	Animal Keeping Fleet Services Motor Vehicle Services, including: General, Car Wash, Commercial Vehicles, Fueling Station Plant Cultivation Recycling Facility Resource Extraction Salvage Yard Self-Service Storage Facility Solid Waste Facility Storage, Outdoor, including: Cargo Container, Official Motor Vehicle Impound, Standard Vehicle, Commercial Vehicle Utilities, including: Major, Minor, and Wireless Telecommunication

3.2 Project Levels

The travel demand generated by large-scale projects—especially projects that provide a large supply of unmanaged vehicular parking[24]—have the potential to impose a greater burden on the transportation system. The TDM Program recognizes that major development projects generate more sizable travel demand than smaller scale projects by scaling up TDM strategy and monitoring requirements as project size increases. The TDM Program assigns progressive compliance requirements to all non-exempt development projects through ascending project levels based on project size and use activity, which is reflective of the project's transportation demand.

[24] Parking management involves strategies that either manage parking demand by pricing incentives to encourage people to try other transportation options, or manage parking supply by encouraging the sharing of parking across sites or uses, thereby encouraging more efficient parking utilization.

Draft Program Guidelines

The criteria for categorizing projects was developed based on Institute of Transportation Engineers (ITE) trip generation rates by comparing similar land uses and generally utilizing the natural breaks proposed by ITE. Breakpoints between projects of Project Levels 1, 2, and 3 were determined and then affiliated with an equivalent land use identified in the ITE Trip Generation Manual, 10th edition.[25]

The following sections define the criteria for categorizing a development project in the appropriate TDM Project Level and the associated reporting activity.

3.2.1 Residential and Commercial Projects

Residential projects are classified based on number of units, while commercial/non-residential projects are classified by square footage.

3.2.2 Mixed-Use Projects

Mixed-use projects are evaluated based on a combination of the proposed uses. For example, if a mixed-use project falls into a lower project level based on one land use (such as number of housing units) and a higher project level based on another land use (such as square footage of employment floor space), the project as a whole will be classified in the higher applicable project level with greater program and monitoring requirements. However, the combination of multiple uses in a single project in and of themselves will not reclassify a project into a higher project level if each use component independently falls into the same project level.

3.2.3 Affordable Housing Projects

The applicability framework recognizes the City's goal to incentivize development of affordable housing[26] and empirical data demonstrating that affordable housing generates higher rates of transit use, less traffic congestion, and lower parking demand than market-rate housing.[27] Given the demonstrated demand for sustainable transportation options and in line with LADOT's goals of improving access to opportunities, the TDM Program does not outright exempt 100% affordable housing projects. Housing projects with 50 or more units where all of the total combined Dwelling Units or Guest Rooms, exclusive of any manager's units, are affordable, are classified in Project Level 1. An affordable dwelling unit, as defined in the TDM ordinance, is a dwelling unit which is restricted by a covenant certified by the City of Los Angeles Housing and Community Investment Department or its successor agency to be rented or sold at an affordable level to, and occupied by, persons or families whose annual income does not exceed 120 percent of the Area Median Income for persons or families residing in Los Angeles County. The Area Median Income and affordable housing costs shall be established from periodic publications of the United States Department of Housing and Urban Development, as determined by the California Department of Housing and Community Development or its successor or assignee. Any Floor Area used for the delivery of Supportive Services, as defined in LAMC 12.03, shall be considered accessory to the residential use. If other land uses on-site fall into a higher project level, the entirety of the project would fall into that higher level.

Table 2 summarizes the applicability criteria for the three TDM Project Levels.

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[25] ITE Trip Generation Manual, 10th Edition, 2017.

[26] City of Los Angeles Department of City Planning Recommendation Report: Affordable Housing Linkage Fee. October 2016.

[27] Local traffic count and parking utilization data demonstrates that affordable housing generates significantly less traffic and parking demand than market-rate housing. http://trrjournalonline.trb.org/doi/abs/10.3141/2319-02.

Draft Program Guidelines

Table 2: TDM Project Levels

	Level 1	**Level 2**	**Level 3**
	New, within the net new floor area:		
Housing	25-49 housing units	50-249 housing units (except as noted in affordable housing section)	250 housing units or more (except as noted in affordable housing section)
Affordable Housing	50 or more housing units, in which all units in the Project (exclusive of managers' units) are affordable dwelling units	N/A	N/A
Employment / Office	25,000-49,999 sf of floor area	50,000-99,999 sf of floor area	100,000 sf or more of floor area
Retail / Customer-Facing	50,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf or more of floor area
Medical Care / Hospital	50,000-99,999 sf of floor area	100,000-249,999 sf of floor area	250,000 sf or more of floor area
Warehouse/ Industrial Space	25,000-99,999 sf or more of floor area	100,000-249,999 sf or more of floor area	250,000 sf or more of floor area
Hotel / Motel	25-99 guest rooms, or suites of rooms	100-249 guest rooms, or suites of rooms	250 or more guest rooms, or suites of rooms
Arena / Stadium / Multiplex Theater	N/A	250,000-499,999 sf of total floor area, or with 10,000 to 19,999 seats	500,000 sf or more of total floor area, or 20,000 or more seats
School, Trade School, College, or University (that requires building permits from the City of Los Angeles)	250 or more students	N/A	N/A

A Project that consists of multiple uses that result in different Project Levels shall be classified in the highest applicable Project Level.
Projects that do not meet ANY of the above criteria are exempt from the TDM Program requirements.

Draft Program Guidelines

3.3 Point Targets

The TDM Program sets a TDM Point Target for each project. The Point Target establishes the total number of points a project must meet by selecting from the list of TDM strategies. Each TDM strategy is assigned a point value. All development projects subject to the TDM Program are required to implement TDM strategies to meet their Point Target.

3.3.1 Base Point Target

Base Point Targets are dependent on a project's TDM Project Level, which relates to project size and land use. Smaller projects may not be able to implement as many TDM strategies as larger projects and therefore, have lower base Point Targets.

3.3.2 Parking's Effect on the Point Target

The cost and ease of finding parking heavily influences a person's decision to drive. As a result, the base Point Target considers a project's provided parking, or the rate of parking supply over the minimum generalized citywide parking baseline.[28] This calculation of a development project's Point Target relying in part on parking supply, follows the rationale of well-established TDM Programs, including programs in Cambridge, Massachusetts and San Francisco, California.

Empirical research supports the claim that when people are guaranteed free or low-cost parking at the beginning and end of their most common trips, they are more likely to drive for the majority of their trips. A study of New York residents with and without reserved parking spaces available to them found commuters with a guaranteed parking space at home are more likely to commute by automobile.[29] As part of the same study, researchers compared two similar neighborhoods and found that people with guaranteed parking at home are 45 percent more likely to drive to Manhattan and 28 percent more likely to drive to work.[30] A study of transit-oriented developments in New Jersey found that parking availability predicted people's driving habits more than access to transit.[31]

One study of nine U.S. cities over 50 years found that gradual increases in parking supply led to significant increases in driving over time. Most notably, as parking supply increased in these nine cities, people began driving for short, local trips once served by walking, biking, and local transit.[32] Despite the generally high rate of driving in one of the cities studied, Hartford, Connecticut, only 71 percent of insurance company employees drove alone to work when they were charged a monthly fee for parking, compared to 83 to 95 percent among employees who received free parking.[33] In fact, past research shows that pricing parking is essential to successful employer-based TDM programs,

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[28] The generalized citywide parking baseline is defined here as the default parking requirements in section 12.21 A.4 of the Los Angeles Municipal Code for each applicable use not taking into consideration other parking incentives to reduce the required parking that would apply, or local development regulations as required in a Specific Plan.

[29] Rachel Weinberger et al., "Guaranteed Parking – Guaranteed Driving," 2008; Rachel Weinberger, "Death by a Thousand Curb-Cuts: Evidence on the Effect of Minimum Parking Requirements on the Choice to Drive," *Transport Policy* 20 (2012): 93–102, doi:10.1016/j.tranpol.2011.08.002.

[30] Chris McCahill et al., "Effects of Parking Provision on Automobile Use in Cities: Inferring Causality," *Transportation Research Record: Journal of the Transportation Research Board* 2543 (2016): 159–65, doi:10.1017/CBO9781107415324.004.

[31] Daniel G. Chatman, "Does TOD Need the T?," *Journal of the American Planning Association* 79, no. 1 (January 2, 2013): 17–31, doi:10.1080/01944363.2013.791008.

[32] Christopher McCahill and Norman Garrick, "Parking Supply and Urban Impacts," in *Parking: Issues and Policies*, ed. Stephen Ison and Corinne Mulley, vol. 5 (Emerald Group Publishing Limited, 2014), 33–55, doi:10.1108/S2044-994120140000005017.

[33] Christopher McCahill and Norman W. Garrick, "Losing Hartford: Transportation Policy and the Decline of an American City," in *18th Annual Meeting of the Congress for the New Urbanism* (Atlanta, GA, 2010).

which can reduce driving alone by 12 to 40 percent.[34] For these reasons, the City's TDM Program also includes a category of parking management strategies in the list of qualified TDM strategies that project applicants can select to meet their Point Target.

3.3.3 Calculating Point Targets

Given the importance of parking supply, projects that provide parking above the generalized citywide parking baseline must meet a Point Target above the base for the project's Level. Specifically, for every 10 percent of additional parking spaces provided above the generalized citywide parking baseline, a project's Point Target increases by 2 points, up to a maximum of 10 additional points per project. The maximum number of points the TDM Program requires is 35 points (**Table 3**). This maximum point target is to avoid an undue burden on project developers or implementation of an infeasible number of TDM points.

For the purposes of the TDM Program, the generalized citywide parking baseline is defined as the default number of parking spaces required by Section 12.21 A.4 of the Los Angeles Municipal Code (or departmental regulatory guidance) for each applicable use. The default number of parking spaces does not consider any potential parking reductions allotted by programs or ordinances, such as the Density Bonus program, the Transit-Oriented Communities (TOC) program, bicycle parking ordinance, and/or area-specific parking reductions. The generalized citywide parking requirement can be found in the Department of Building and Safety's Summary of Parking Regulations.[35]

In order to meet the Point Target, a project must apply qualified TDM strategies in order to offset its estimated drive alone demand, as defined in Chapter 4 of the TDM Program Guidelines. LADOT developed a TDM Calculator to assist applicants in understanding their Point Targets.

Table 3: TDM Program Point Targets

	TDM Project Level		
Parking Provided	**Level 1**	**Level 2**	**Level 3**
0% - 109% of generalized citywide parking baseline	15 points	20 points	25 points
110% - 119% of generalized citywide parking baseline	17 points	22 points	27 points
120% - 129% of generalized citywide parking baseline	19 points	24 points	29 points
130% - 139% of generalized citywide parking baseline	21 points	26 points	31 points
140% - 149% of generalized citywide parking baseline	23 points	28 points	33 points
150% or greater of generalized citywide parking baseline	25 points	30 points	35 points

[34] Thomas J. Higgins, "Demand Management in Suburban Settings," *Transportation* 17 (1990): 93–116, doi:10.1007/BF02125331.

[35] Los Angeles Department and Building and Safety. Summary of Parking Regulations. Document No. P/ZC 2002-011 (https://www.ladbs.org/docs/default-source/publications/information-bulletins/zoning-code/summary-of-parking-regulations-ib-p-zc2002-011.pdf?sfvrsn=24)

Draft Program Guidelines

Chapter 4: Qualified TDM Strategies

To meet Point Targets, projects apply qualified TDM strategies to offset their estimated drive alone trip demand. Varying point values are assigned to each TDM strategy commensurate to its estimated effectiveness in reducing drive alone trips, VMT, and vehicle trips. This chapter describes each strategy in depth and offers alternative methods for compliance to the TDM Program for projects that propose new or innovative approaches. LADOT's TDM Calculator, an online application, is available to help applicants navigate their TDM Program requirements. The TDM Calculator provides a project's Point Target and sums the number of points earned as a result of the total TDM strategies selected by the developer. **Appendix B** summarizes the best practice research that informs the selection of qualified TDM strategies and the assignment of point values.

4.1 Evaluating the Effectiveness of TDM

Various factors influence travel choices, including population, housing and jobs density, land use diversity, street network design, proximity to high-quality transit options, and information and awareness of available travel modes. The City's TDM Program includes strategies that can encourage, promote, and support sustainable travel to and from project sites. Tables 4 through 20 under Section 4.2.4 provide the list of qualified TDM strategies that are available to project applicants or owner/tenants subject to the TDM Program. This section contains information about each strategy, land use compatibility, and point value. **Appendix C** contains the same menu of TDM strategies in a simplified printer-friendly table format.

4.1.1 Literature Review

One of the principal sources of information on the effectiveness of TDM measures is the 2010 report published by the California Air Pollution Control Officers Association (CAPCOA) titled "Quantifying Greenhouse Gas Mitigation strategies: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures." The CAPCOA report estimates how greenhouse gas emissions (GHGs) are influenced by land use, transportation, energy use, and other factors, based upon a review of the latest research. The CAPCOA report motivated City staff and State Smart Transportation Initiative (SSTI) researchers to conduct a comprehensive literature review to further inform the list of qualified TDM strategies and assignment of point values. Point values were assigned to each TDM strategy based on available evidence of demonstrated effectiveness to reduce drive alone trips, VMT, and/or vehicle trips. The following sections summarize the empirical research findings, local data analyses, best-practice research, and transportation practitioner expert judgment that qualify the TDM strategies available for application. Additional resources that were used to inform this document are included in **Appendix B**.

4.2 Menu of Qualified TDM Strategies

Listed below are qualified TDM strategies and their respective point values. Applicants may select from this menu and/or may select a TDM Package, a simplified bundle of pre-qualified strategies. For a list of the TDM strategies in a table format, see **Appendix C**.

4.2.1 Strategy Applicability

While many strategies apply to projects of all types, some strategies are only proven effective for a particular land use. The applicable land uses for each TDM strategy are described below. Unless otherwise noted, "employment" includes offices, industrial, warehouses, hotels, arenas, stadiums, theaters, and other land uses other than housing, retail, and schools.

4.2.2 Strategies Not in Compliance

TDM strategies that do not meet Los Angeles TDM Program objectives are not qualified to fulfill Point Targets and, thus, are not available options for property owners and employers. An example of a non-qualifying TDM strategy is

varying employers' shift times without complementing this strategy with other strategies. This strategy applied on its own would result in spreading traffic to off-peak hours, but would not reduce overall demand for vehicle use. By shifting trips to off-peak, the total VMT is not reduced.

4.2.3 User-defined TDM Strategies

New opportunities to reduce drive alone trips, VMT, and vehicle trips are constantly emerging. The TDM program embraces effective innovation and will adapt over time. In order to receive points for strategies not on this menu, an applicant may apply for discretionary approval of a proposed "User-Defined TDM Strategy." The application for such approval will be submitted to the DCP and will include evidence that the proposed strategy will meet the TDM Program goals. LADOT staff will assist in reviewing proposals, which will be accepted or rejected with justification, and with a point value assigned as needed. Enhanced monitoring and reporting may be required for these strategies. If strategies are approved but do not demonstrate expected results down the line, staff may require the future owner or tenant to substitute the strategy with another of equal or greater point value. TMOs or community members can also propose user-defined strategies during the development review process.

If a user-defined TDM strategy is approved, an additional monitoring report is required. This report should include a clear description of the strategy as agreed upon by LADOT and the applicant, provide data to prove the efficacy of the user-defined strategy, and specify metrics to evaluate the strategy's ability to reduce drive alone trips, VMT, and/or vehicle trips. An annual performance monitoring report is required to LADOT for all user-defined strategies. Methodology for assessing effectiveness must be included.

4.2.4 TDM Strategies Described

The following TDM Strategies are listed in alphabetical order.

Affordable Housing

Table 4: Affordable Housing TDM Strategies

Projects may be eligible for a maximum of one (1) Affordable Housing TDM Strategy.

Affordable Housing TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Affordable Housing 1: 20% of State Density Bonus	Projects that are eligible for a Density Bonus of 20% or more (under CA Government Code Sec. 65915) and provide a minimum of: · 10% Low Income; or · 5% Very Low Income.	2 Points	Employment Retail

Draft Program Guidelines

Affordable Housing 2: TOC Tier 1, 2, or 3 or equivalent	Projects that provide the following Affordable Housing percentages or commensurate minimum Tier 1 percentages in the most recent TOC Guidelines: · 20% Low Income; · 11% Very Low Income; or · 8% Extremely Low Income.	4 Points	Employment Retail
Affordable Housing 3: TOC Tier 4 or equivalent	Projects that provide the following Affordable Housing percentages or commensurate Tier 4 percentages in the most recent TOC Guidelines: · 25% Low Income; · 15% Very Low Income; or · 11% Extremely Low Income.	6 Points	Employment Retail
Affordable Housing 4: 100% Affordable	Projects in which 100% of the housing units (exclusive of any manager's unit(s)) are affordable dwelling units.	10 Points	Employment Retail

Bicycle Facilities

Table 5: Bicycle Facilities TDM Strategies

Bicycle Facilities TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Bicycle Facilities 1: Locate near a Bike Share Station*	Project is located within 600 feet of an existing bike share station - Bike Share Location Map. *Metro shall pre-approve the selection of this TDM Strategy and may require	2 Points	---

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	an agreement with the applicant. May not be combined with Bicycle Facilities 2.		
Bicycle Facilities 2: Install Bike Share Station*	Install a publicly accessible bike share station with a minimum of 10 docks. *Must be pre-approved by Metro and may require an agreement May not be combined with Bicycle Facilities 1.	5 Points	---
Bicycle Facilities 3: Bike Share Memberships*	Offer bike share membership passes to employees and/or residents in accordance with available pass options (applicable for locations within 0.25 miles from an existing or planned bike share station - Bike Share Location Map). *LADOT shall pre-approve the selection of this TDM Strategy to verify that the project is within an eligible location.	- 5 Points (See https://bikeshare.metro.net/for-business/)	---
Bicycle Facilities 4: Bicycle Parking	Install and maintain on-site bicycle parking at or above ratios as determined in Sections 12.03, 12.21, and 12.21.1 of the L.A.M.C.	2 Points	---
Bicycle Facilities 5: Changing and Shower Facilities	Provide clothes changing and/or shower facilities for employees or students at or above ratios as determined in Section 91.6307 of the L.A.M.C.	Private = 2 Points Publicly Accessible = 4 points Publicly Accessible and in a disadvantaged area = 5 points	Housing

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Bicycle Facilities Bonus	Implementation of three or more Bicycle Facilities strategies for bonus points.	3 Strategies = 1 Point 4 Strategies = 2 Points	---

Car Sharing

Table 6: Car Sharing TDM Strategies

Car Sharing TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Car Sharing 1: Car Share Parking	Provide at least one car share space per 25 employees/dwelling units, with a minimum of two car-share parking spaces. Requires cooperation with a car share service provider.	Private = 3 Points Publicly Accessible = 4 points	School
Car Sharing 2: Car Share Memberships*	Offer an annual car share membership, not including trip fees (through a third-party car share service operator) for at least 50% of residents or employees (applicable for locations within 0.25 miles of an existing service area). If the applicant selects BlueLA as the provider, the TDM point total from this measure is 4 points. *LADOT shall pre-approve the partnership. Eligible projects must be located within 0.25 miles of existing BlueLA vehicle spaces.	3 Points Membership to Blue LA program or in a disadvantaged area = 4 points*	School
Car Sharing 3: Private Car Share Fleet	Provide a car share fleet available to all building	5 Points	School

Draft Program Guidelines

	occupants. Minimum of 2 cars per project site.		
Car Sharing Bonus	Implementation of two or more Car Share strategies for bonus points.	2 Points	School
Electric Vehicle Bonus	Provide 100% electric vehicle fleet or membership to electric vehicle car share program for a bonus point.	1 Point	School

Child Care

Table 7: Child Care TDM Strategies

Child Care TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Child Care 1: On-site Child Care	On-site child care provided by a licensed childcare provider.	2 Points	Housing

High-Occupancy Vehicles

Table 8: High Occupancy Vehicles TDM Strategies

High-Occupancy Vehicles TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
High-Occupancy Vehicles 1: Guaranteed Return Trip	Provide at least six annual taxi or Transportation Network Companies (TNC) fare vouchers or reimbursements for at least 50% of employees who travel by non-drive alone trips.	2 Points	Housing

Draft Program Guidelines

High-Occupancy Vehicles 2: HOV Parking	Provide free, reserved HOV parking spaces (carpool, vanpool, etc.). Should be closer to the building entrance than other non-HOV parking spaces (excluding ADA stalls). Must install a minimum of 2 HOV parking spaces. HOV parking must account for 10% or more of total parking spaces.	2 Points	Housing
High-Occupancy Vehicles 3: HOV Program	HOV Program where school administrators, employers, residential property managers, or homeowners associations coordinate, promote, and maintain a HOV program or service to match individuals, groups, parents and/or families available to share rides on a regular basis.	2 Points	Retail
High-Occupancy Vehicles 4: Mandatory trip-reduction Program	Deploy an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of travel choices and opportunities to alter their habits. The program typically includes a coordinated ride-sharing, vanpool and/or carpooling program, requires a program coordinator, and includes program monitoring, reporting and evaluation. A minimum of 50% of all employees on site should be eligible for the trip reduction program. May not be	8 Points	Housing

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	combined with Information 3 or 4.		

Information

Table 9: Information TDM Strategies

Information TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Information 1: Transit Displays	Provide real-time transit arrival displays at each major entrance of the project site. Display should capture transit options within 0.25 miles.	Internally visible = 2 Points Publicly visible = 3 points	---
Information 2: Wayfinding	Post wayfinding signage near major entrances directing building users to rail stations, bus stops, bicycle facilities, bicycle parking, car sharing kiosks, and other sustainable (non-drive alone) travel options, provided inside and/or outside of the building.	1 Point	---
Information 3: Education, Marketing, and Outreach	Offer new employees and residents a packet of materials and/or provide personal consultation detailing sustainable (non-drive alone) travel options. These materials or consultations must be available on an ongoing basis and/or on permanent online channels. Packet must include the distribution of one Metro TAP card preloaded with a day pass or equivalent value, to	4 Points	---

Draft Program Guidelines

	each employee or residential unit. May not be combined with High-Occupancy Vehicles 4 or Information 4.		
Information 4: Voluntary Travel Behavior Change Program	A multi-faceted program involving two-way communication campaigns and travel feedback that actively engages participants to target individual attitudes, goals, and travel behaviors to alter their travel choices and habits. Program must include the distribution of one Metro TAP card preloaded with a day pass or equivalent value, to each employee or residential unit. Selection of this strategy requires a coordinator to manage the program, and ensure communication is available to all regular occupants of a site with a special focus on new occupants and/or employees. Must include participation from 20% of the project site's tenants/users to qualify for this TDM strategy. This strategy pairs well with a TMO. It may not be combined with Information 3 or High-Occupancy Vehicles 4.	6 Points	---
Information 5: School Safety Campaign	The yearlong Safety Campaign targets the school's parents and students to heighten their awareness of the importance of traffic safety. This campaign also	4 Points	Employment Retail Housing

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	integrates TDM strategies to bring awareness to how parents and students can reduce congestion.		

Mixed-Use

Table 10: Mixed-Use TDM Strategies

Mixed-Use TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Mixed-Use 1	Projects that are mixed-use and provide no more than 85% of floor area for a single land use.	5 Points	---

Mobility Investment

Table 11: Mobility Investment TDM Strategies

Mobility Investment Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Mobility Investment 1: Access Improvements*	Install or make contributions to new or improved facilities in the public right-of-way (PROW) that support greater access to the project by people that bicycle, walk, and take transit and/or enable access to or through the project from a regional bicycle or multi-use path. All PROW investments shall be consistent with the Mobility Plan 2035,	4 points for incorporating access to project site from a bicycle or multi-use path 4 points for improvements to 25-49 percent of ¼ mile walkshed or commensurate value 6 points for improvements to 50-74 percent of ¼ mile walkshed or commensurate value	---

Draft Program Guidelines

	and may include, but are not limited to, curb extensions, leading pedestrian intervals, controlled mid-block crosswalks, pedestrian refuge islands, protected bicycle lanes, bike boxes, exclusive bicycle signal phases, street trees, etc. LADOT shall be consulted to verify the opportunity and feasibility of access improvements near the project site. The point values are relative to the improvement and location, and shall be determined in coordination with LADOT staff. *LADOT shall pre-approve the selection of this TDM Strategy to confirm availability of a mobility investment solution that meets the needs of people that bicycle, walk, and take transit in the project area and can be addressed by the proposed funding.	8 points for improvements to 75-99 percent of ¼ mile walkshed or commensurate value 10 points for 100 percent of improvements of ¼ mile walkshed or commensurate value	
Mobility Investment 2: Mobility Management	Funds capital expansion, operations, and maintenance for existing sustainable mobility programs (Metro Bike Share, carshare, etc.).	2 Points for $50,000-$199,999 4 points for $200,000-$499,999 6 points for $500,000 and above	---

Parking

Draft Program Guidelines

Table 12: Parking TDM Strategies

Parking TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Parking 1: Pricing and Unbundling Parking*	Pricing of parking encourages sustainable modes of travel (non-drive alone) and can be accomplished in several ways. Property managers and homeowner associations can unbundle the price of parking from rents or sale of units.[36] The parking cost is set by the project applicant and paid by the vehicle owners/drivers. *This strategy may not be combined with Parking 2: Parking Cash Out.	1 point - the cost of each parking space is at least $25/mo. 4 points - the cost of each parking space is at least $110/mo. 8 Points - the cost of each parking space is at least $220/mo.	Retail
Parking 2: Parking Cash Out	Implement a "cash out" program, where all full or part-time employees who do not use a parking space are paid the value of the space instead in time increments that the parking is leased. The value of a space shall be the leased cost, if leased, and shall be the market value of a parking space if owned by the property owner. *This strategy may not be combined with Parking 1: Pricing and Unbundling Parking.	4 Points	Housing, Retail
Parking 3: Shared Parking	Share parking among different land uses or properties. A notarized	1 - 4 Points (1 point for every 25% of parking stalls available to occupants during	---

[36] For projects that are using incentives pursuant to the City's density bonus ordinance, the separate sale or rental of a dwelling unit and a parking space shall not cause the rent or purchase price of a Restricted Affordable Unit, including the parking space, to be greater than it would otherwise have been.

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	agreement among tenants or property owners is required to receive points.	effective hours of shared parking)	
Parking 4: Public Parking	Provide public access to the property's parking. Must be coupled with on-demand parking availability publicized through public signage and/or approved mobile application. This strategy is especially encouraged for properties that provide parking supply at rates above L.A.M.C. or Specific Plan requirements. To earn points for this strategy, a project must provide the number of parking spaces available for public use. That supply must be, at a minimum, 25% of the total parking supply rounded up to the next whole number.	4 Points	---
Parking 5: Reduced Parking Supply	Reduction in parking supply below the generalized citywide parking baseline (See Glossary), using parking reduction mechanisms, including, but not limited to, TOC, Density Bonus, Bicycle Parking ordinance, locating in an Enterprise Zone or Specific Plan area, or compliance with zoning regulations that require less parking than the generalized citywide parking baseline. Points are also awarded for projects providing a reduced supply of parking as allowed by an approved variance.	2 Points - reduces 10% - 24% of the parking spaces available relative to the parking baseline. 4 Points - reduces 25%-49% of the parking spaces available relative to the parking baseline. 8 Points - reduces 50%-89% of the parking spaces available relative to the parking baseline. 12 Points - reduces 90%-100% of the parking spaces available relative to the parking baseline.	---

Draft Program Guidelines

Shared Micro-Mobility

Table 13: Shared Mobility TDM Strategies

Shared Micro-Mobility TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Shared Micro-Mobility 1: Service Membership	Partner with a shared micro-mobility company to provide discounted membership fees for building occupants (e.g., residents and employees). Make shared micro-mobility fleet devices accessible for easy identification and use.	1 Point	---
Shared Micro-Mobility 2: Local Shared Fleet	Purchase and operate a shared micro-mobility fleet that is available on-site for use or rent for building occupants (e.g. residents and employees). The fleet size shall be determined to ensure a shared device is available 90 percent of the time it is requested.	1 Point	---

Telecommute

Table 14: Telecommute TDM Strategy

Telecommute TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use

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Telecommute 1: Telecommute	Offer employees a telecommute option for at least 1 day a week, which would allow employees to work from home rather than commute to the office. This telecommute option must be available to at least 50% of employees assigned to the project site.	2 - 6 Points (one additional point for each additional day an employee is allowed to work from home)	Housing Retail School
Telecommute 2: Televisits	Offer visitors virtual visitation options including telehealth, virtual meetings, remote learning, and conferencing.	3 Points	Housing Retail

Transit Access

Table 15: Transit Access TDM Strategies

Transit Access TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
Transit Access 1: Neighborhood Shuttles/Microtransit Service*	Operate a neighborhood-serving transit service (shuttle/ microtransit/ etc.). *LADOT shall pre-approve the selection of this TDM Strategy to ensure that the neighborhood-serving transit service is complementing and not substituting existing transit services.	Service that connects within the neighborhood but does not connect to high-quality transit stations = 3 Points Along a route that connects to high-quality transit station(s) = 5 points. Publicly available = +3 points Publicly available and in a disadvantaged area =	---

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		+4 points	
Transit Access 2: Transit Passes	Provide all employees/residential units transit subsidies. Points awarded vary based on the amount of transit subsidy provided per employee or residential unit.	Subsidy per employee or residential unit for Metro TAP card monthly fare: 25% of monthly fare = 7 Points; 50% of monthly fare = 10 Points; 75% of monthly fare = 12 Points 100% of monthly fare = 14 Points	---
Transit Access 3: Improve Transit Service*	Provide funding to a local transit provider for improvements that improve service quality (reduce headways, etc.) at transit stops within ¼ mile radius of the project site. Funds could also contribute to an existing shuttle or microtransit service (e.g., DASH),in consultation with LADOT if this option is available near the project site. *LADOT shall pre-approve the selection of this TDM Strategy to ensure the availability of qualifying transit service that serves the property.	3 Points	---
Electric Transit Vehicle Bonus	Provide 100% electric vehicle or bus for a bonus point.	1 Point	---

Transportation Management Organizations

Draft Program Guidelines

Table 16: TMO TDM Strategies

TMO TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
TMO 1: Join a TMO*	Join an existing TMO. *LADOT shall pre-approve the selection of this TDM Strategy to verify the availability of a qualifying TMO that could serve the property. For a reference of criteria that is considered in pre-qualifying a TMO, see Appendix E: Transportation Management Organization (TMO) Certification Guidelines.	2 Point	---
TMO 2: Create a new TMO*	Create a new TMO in an area where there is not already an existing TMO service. Should a project select to start a new TMO, the project must not be within an existing TMO service area and must commit to a two-year membership to be awarded points. *LADOT shall pre-approve the selection of this TDM Strategy to verify the feasibility of establishing a TMO that could serve the property. For a reference of criteria that is considered in pre-qualifying a TMO, see Appendix E: Transportation Management Organization (TMO) Certification Guidelines.	4 Points	---

Draft Program Guidelines

User-defined TDM Strategies

Table 17: User-defined TDM Strategies

User-defined TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
User-defined strategies*	Implement a strategy in coordination with LADOT that does not appear in Appendix C. *Requires consultation with LADOT before submittal of a TDM Plan. User-defined strategies must have approval from LADOT before the TDM Plan is accepted.	Point value may vary.	---

4.3 TDM Packages

Suggested packages of TDM strategies are provided below for ease of use for the applicant. These packages are available only to projects classified as Project Level 1 with a Point Target of 15 points, and are designed to allow the applicant to fulfill the 15 Point Target with a predetermined set of TDM strategies plus a bonus point. The additional point is provided for selecting a TDM package to encourage the synergies of strategies that are shown to be effective when combined.

Table 18: Level 1 Residential TDM Package

Implementation of all strategies in this package is equivalent to 15 points, or the default Project Level 1 Base Point Target

Level 1 Residential TDM Package (15 points)	TDM Strategy Description
Bicycle Facilities 4: Bicycle Parking	Install and maintain on-site bicycle parking at or above ratios as determined in the L.A.M.C.
Information 3: Education, Marketing, and Outreach	Offer new residents a packet of materials and/or personal consultation detailing sustainable (non-drive alone) travel options on an ongoing basis
Parking 1: Pricing/ Unbundling	Price or unbundle parking costs at a cost of $220/mo for each parking space.

Draft Program Guidelines

Table 19: Level 1 Employer TDM Package

Implementation of all strategies in this package is equivalent to 15 points, or the default Project Level 1 Base Point Target

Level 1 Employer TDM Package (15 points)	TDM Strategy Description
Bicycle Facilities 4: Bicycle Parking	Install and maintain on-site bicycle parking at or above ratios as determined in the L.A.M.C.
Information 3: Education, Marketing, and Outreach	Offer new employees a packet of materials and/or personal consultation detailing sustainable (non-drive alone) travel options on an ongoing basis
Parking 1: Pricing and Unbundling Parking	Price workplace parking for all employees to encourage sustainable modes of travel (non-drive alone). The parking cost must be set at the maximum range in Parking 1 Strategy to realize incentive in the employer TDM Package.

Table 20: School TDM Packages

Implementation of all strategies in this package is equivalent to 15 points, or the default Project Level 1 Base Point Target.

Level 1 School TDM Package (15 points)	TDM Strategy Description
Bicycle Facilities 4: Bicycle Parking	Install and maintain on-site bicycle parking at or above ratios as determined in Sections 12.03, 12.21, and 12.21.1 of the L.A.M.C.
Information 4: Voluntary Travel Behavior Change Program	A multi-faceted program involving two-way communication campaigns and travel feedback that actively engages school employees to target individual attitudes, goals, and travel behaviors to alter their travel choices and habits. Program must include the distribution of one Metro TAP card preloaded with a day pass or equivalent value, to each school employee. Selection of this strategy requires a coordinator to manage the program, and ensure communication is available to all school employees. Must include participation from 20% of the school employees to qualify for this TDM strategy.
High-Occupancy Vehicles 3: HOV Program	HOV Program where school administrators coordinate a HOV program to match individuals, groups, parents and/or families who live near one another and are available to share rides on a regular basis.
Information 5: School Safety Campaign	The yearlong Safety Campaign targets the school's parents and students to heighten their awareness of the importance of traffic safety. This campaign also integrates TDM strategies to bring awareness to how parents and students can reduce congestion.

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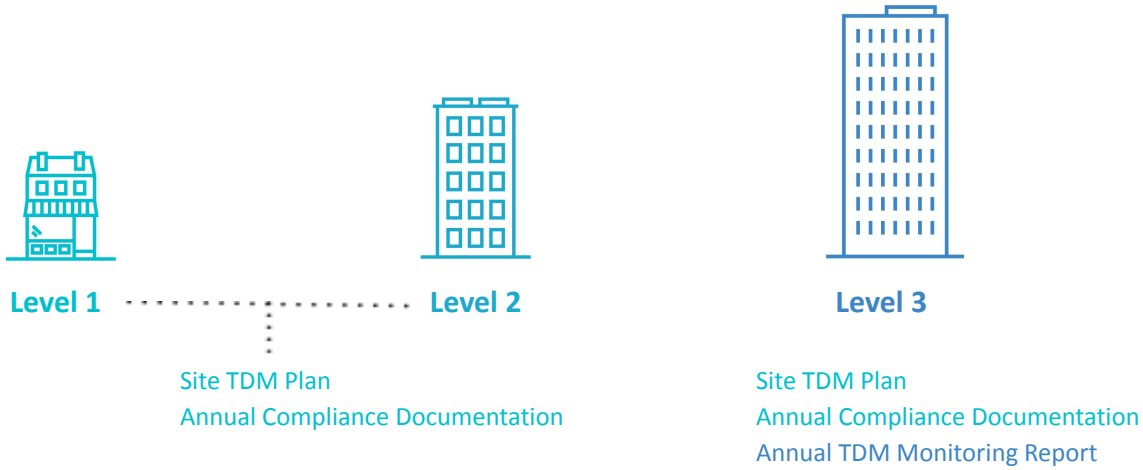
Chapter 5: Compliance & Monitoring

5.1 Compliance & Monitoring Requirements

Projects in all project levels are required to implement qualified TDM strategies to meet Program goals. For projects subject to the TDM Program, the Project applicant must prepare a TDM Plan that demonstrates compliance and submit the TDM Plan to LADOT for their review and approval. Before any use permit and/or certificate of occupancy are issued for the project, the Project applicants must execute and record a Covenant and Agreement that an approved TDM Plan, and the TDM strategies contained therein, will be maintained throughout the life of the project. A TDM Plan may be modified as specified in the TDM Ordinance and at the discretion of LADOT. The largest development projects (Level 3), with greater quantities of housing units and/or square footage, must also commit to more substantial monitoring obligations to ensure TDM strategies are effective. The figure below demonstrates the compliance and monitoring requirements by Project Level. Failure to meet monitoring obligations can subject the project to penalties.

Figure 1: Compliance Requirements



Each project subject to this program is responsible for designating a TDM Coordinator who coordinates with the City and the property owner and/or property manager to demonstrate the project's compliance with the approved TDM Plan and submitting some form of documentation of compliance. Level 1 and Level 2 development projects are only responsible for submitting Annual TDM Plan Compliance Documentation and Level 3 Projects are responsible for submitting an Annual TDM Monitoring Report in addition to Annual TDM Plan Compliance Documentation. Performance monitoring forms that could support an Annual TDM Monitoring Report are available in **Appendix D**. All performance monitoring elements described below should be submitted to LADOT via email at ladot.tdm@lacity.org. All required performance monitoring forms must be submitted annually for each year in a five-year period with an option at LADOT's discretion to restart the monitoring period if the property is out of compliance at any point during that time. In the event that a property owner complies with the monitoring requirements for five years, the property owner is still responsible for submitting the TDM Plan Compliance Documentation that demonstrates how they are maintaining the TDM strategies as specified in their TDM Plan. LADOT may, at its discretion, enter the property to inspect TDM strategies and restart the monitoring requirements if there is evidence that the property owner is not maintaining the TDM strategies.

5.1.1 TDM Plan

All projects subject to the TDM Program must provide a complete TDM Plan and receive approval of the TDM Plan from LADOT prior to receiving any building permits, certificate of occupancy, or entitlement action processed by

the Department of City Planning. The TDM Plan should contain all relevant project information such as the description of the proposed use, associated case number(s), the total parking supply, and the selection of TDM strategies proposed to comply with the Program. Applicants should use the TDM Calculator to select the TDM Strategies that they propose to implement. The TDM Calculator is an online application that simplifies compliance with the TDM Program. After a project applicant inputs project information, the TDM Calculator displays the total Point Target required for the project. The Point Target is based on the project level assigned to the proposed use and the total supply of parking. The TDM Calculator summarizes the Target Points - or the summary of the TDM strategy points selected. The TDM Calculator produces a summary report that forms the basis of the TDM Plan. The TDM Plan shall be submitted to LADOT for review.

5.1.2 TDM Plan Compliance Documentation

All projects subject to the TDM Program must provide LADOT complete and accurate TDM Plan Compliance Documentation annually, beginning on January 15th following a date of one year after the issuance of the Certificate of Occupancy, and each January 15th thereafter. See the template TDM Checklist Form in **Appendix D**. This form provides LADOT information about the project including property owner, property address, contact of the property's TDM Coordinator and/or on-site contact person, project land use (i.e., number of housing units, square footage of retail, etc.), and selected TDM strategies to meet the Project Target. Compliance with the TDM Program will be determined by LADOT's review of the TDM Documentation demonstrating how the TDM strategies are or will be implemented. The TDM Documentation will need to be submitted on an annual basis in order to remain in good standing. The annual reporting will also allow owners or tenants the opportunity to revise their list of selected TDM strategies over time to meet their Point Target.

5.1.3 TDM Monitoring Report

In addition to the TDM Plan Compliance Documentation, Project Level 3 projects will be responsible for collecting monitoring data and submitting it in an annual TDM Monitoring Report, beginning on January 15th following a date of one year after the issuance of the Certificate of Occupancy, and each January 15th thereafter. LADOT will work with the Project applicant to prepare an agreement that defines the contents of the TDM Monitoring Report that apply to their project, as appropriate for the selected TDM strategies. The agreement will be formalized in a TDM Monitoring Data Collection Plan. The TDM Monitoring Data Collection Plan will define performance metrics, data collection instruments, specific data collection technologies, optimal data collection formats, and monitoring data reporting frequency. LADOT will rely on a digital reporting format that captures components of site level travel trends. LADOT is exploring data collection technologies that would automate and streamline the collection of aggregate travel data to the extent feasible and in observation of personal data privacy practices. The TDM Monitoring Data Collection Plan can be revised upon the concurrence of both LADOT and the property owner to capture any changes that are necessary to realize greater administrative efficiencies in data collection. The Project application will need to submit the TDM Monitoring Data Collection Plan for LADOT review and approval prior to issuance of a Certificate of Occupancy.

Site level trends should capture residents, employees, students or visitors traveling to and from the Project site. Performance metrics contained within a TDM Monitoring Report were developed using best practices from various national and local examples, including Specific Plan areas within the City of Los Angeles. Potential performance metrics are further defined below.

Travel Surveys

Average vehicle ridership (AVR) is a reliable performance metric to evaluate travel trends in the travel surveys. AVR is the total number of people arriving to a site over a period of 24-hours, divided by the total number of personal and TNC vehicle trips made to and from that site during the same period. Higher AVR numbers demonstrate more people are using sustainable travel modes like carpooling, transit, biking, or walking. Vehicle trips are directly linked to VMT. Therefore, collecting AVR survey information can identify how people are traveling to a project site and what types of strategies can be used to reduce the number of vehicle trips and resulting VMT.

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Travel Surveys collect data on anonymized and aggregated travel patterns of site users. This survey will provide information on typical travel patterns during an average week. The Travel Survey will collect data on transportation mode choice, mode split, alternative work schedules, and alternative travel hours. Sites must achieve at least a 60 percent response rate to be considered compliant with the TDM Program. Findings of the Travel Survey must be summarized by the employer, property manager, TMO, or the project's TDM coordinator.

Parking-Hour Utilization

Projects that are required to monitor parking utilization as part of their TDM Monitoring Data Collection Plan shall report on parking utilization for both parking on-site, and at the neighborhood level where on-street parking spaces outside the building are unmetered(within at least 500 feet of a building entrance). These projects should have the capability to submit 365-days of vehicle parking-hour utilization data for off-street parking, or the numbers of occupied and unoccupied parking stalls for each hour. The count for on and off-street parking must be over a 24-hour period, across seven consecutive days, while LAUSD schools are in session and on weeks that do not include a state holiday. To collect parking occupancy data, it is recommended that the building owner or property manager rely on automated count technology that include parking occupancy sensors, video-space recognition, and/or vehicle detection at parking structure entrances such as gate arms and inductive loops. Neighborhood on-street parking demand can be captured by remote photography, video detection or manual counts where sensors are not available. The project design team should be familiar with the parking occupancy reporting requirements when designing the parking structure to take advantage of the most cost-effective parking count technology available.

To account for parking that is shared with other uses, through a survey or other methods, the property owner shall identify the number of parking spaces reserved for on-site occupants and those that are leased for off-site uses. For residential uses, the property owners or managers shall provide a means to identify automobiles that are not owned by the property residents. This data will identify instances in which residents of buildings are using on-street parking and help determine whether better on-street-parking management near the project site may be needed. Findings from vehicle parking utilization studies should be included in each Level 3 project's annual report to LADOT where specified in a project's TDM Monitoring Data Collection Plan.

5.1.4 Site Enforcement

LADOT staff will verify compliance, as needed, and review TDM Plan Compliance Documentation and TDM Monitoring Reports submitted by the property owner. LADOT will review TDM Plan Compliance Documentation in a checklist format (forms available in **Appendix D**) to ensure both programmatic and physical TDM strategies are implemented and continue to be available mobility options over time. Should a TDM strategy submitted in the TDM Plan Compliance Documentation form be found to be missing, City staff will provide a warning to the project contact. Similarly, for Level 3 Projects, if annual monitoring data is not submitted on time, City staff will provide a 30-day warning to the project contact. Following a project's first warning, further non-compliance will subject the project to progressive penalties.

South Coast AQMD Rule 2202 and Employment Uses

Large employers may be required to report compliance with other regional TDM regulations in addition to meeting compliance with the City's TDM Program. Pursuant to the state and federal Clean Air Act, South Coast AQMD administers Rule 2202, which requires large employers that employ over 250 employees to meet an Emission Reduction Target (ERT) that South Coast AQMD specifies for a compliance year. Employers have the option of complying with Rule 2202 by electing to fund the Air Quality Investment Program (AQIP) or by purchasing offset credits through the Emission Reduction Strategies compliance option. The South Coast AQMD also allows large employers to pursue commute trip reduction strategies, as measured in AVR, as one alternative option to meet their assigned ERT. Employers electing to choose either the AQIP or the Emission Reduction Strategies compliance options would not be required to provide employees with options to directly reduce mobile source emissions.

Draft Program Guidelines

Large employer sites that select trip reduction strategies as the primary means to comply with Rule 2202 ERT are expected to achieve the below AVR targets, according to South Coast AQMD AVR Performance Zones.:[37] Employment sites with a smaller proportion of employees that drive alone and a higher proportion that commute with non-drive alone modes, such as carpool, transit, walk, or bicycle would report greater AVR ratio values.

- Zone 1: 1.75 AVR (Central City area)
- Zone 2: 1.50 AVR (Majority of the City of Los Angeles)
- Zone 3: 1.30 AVR (San Gabriel Mountains area)

A map of South Coast AQMD AVR Performance Zones in the City of Los Angeles with an address lookup function to determine your project's Zone and your project's AVR standard, can be found here. Employment sites that select the commute trip reduction strategies option when complying with Rule 2202 are required to survey employees on their primary travel-to-work mobility option, or combination of options.

5.1.5 Transportation Management Organizations (TMOs)

Transportation Management Organizations (TMOs) can provide administrative support and monitoring of its members to ensure compliance with the TDM Program. Membership to a TMO may also satisfy a project's requirements to designate TDM Coordinator if the scope of their services includes documenting the project's compliance with the TDM program as addressed in Section 5.1.2 and 5.1.3 above. TMOs are organizations that provide up-to-date information and resources to help reduce dependence on drive alone trips and encourage sustainable transportation choices for all site users. Should a project subject to the TDM Program be a member of a TMO, the TMO would be responsible for site inspections of the TDM strategies and would be expected to provide monitoring reports to LADOT. LADOT will certify TMOs that are eligible to provide administrative support, monitoring, and enforcement of TDM for properties within the City of Los Angeles. The documentation requirements that inform TMO's eligibility are included in Appendix E: Transportation Management Organization Certification Guidelines.

5.1.6 Review Fees

The TDM Program requires City staff effort for monitoring projects for TDM Program compliance. All Projects would need to submit annual documentation demonstrating compliance with this requirement. A review fee must be submitted to LADOT with the TDM Plan Compliance Documentation for Level 1 and 2 Projects annually. In addition to the TDM Plan Compliance Documentation, Project Level 3 projects are also required to submit annual TDM Monitoring Reports. City staff may conduct randomized inspections to verify compliance with the TDM Program. Therefore, for Level 3 projects, a review fee must be submitted to LADOT with the project's annual TDM Plan Compliance Documentation and Monitoring Report. The City may discount annual review fees for members of a certified TMO since City review efforts may be reduced due to TMO involvement. Fees are referenced in Los Angeles Municipal Code (LAMC) Section 19.15 and may periodically be updated.

5.2 Non-Compliance

Projects that are not implementing their selected TDM strategies and/or following the outlined monitoring and reporting requirements will be found to be in non-compliance. In addition to civil penalties described below, the City shall withhold issuance of building, grading, demolition, foundation, use of land, and change of use permits, and issuance of Certificates of Occupancy, for any properties that fail to comply with the TDM Program.

5.3 Penalties

Projects that are deemed to be non-compliant with the TDM Program will be subject to penalties beyond the enforcement mechanisms outlined above. An applicant that is non-compliant with the TDM Program is in violation

[37] South Coast AQMD Rule 2202, Employee Commute Reduction Program (ECRP) Guidelines

Draft Program Guidelines

of the LAMC and, therefore, subject to a maximum civil penalties and/or administrative fines for each and every offense (LAMC Section 11.00, Section 11.2.04 (b), and Section 12.26 J.7). Any person failing to comply with the mandatory requirements of the TDM Program shall be subject to an infraction charged by the City Attorney. Additionally, no building, grading, demolition, foundation, use of land or change of use permit, or a Certificate of Occupancy, shall be issued for any eligible Project that has not complied with the TDM Program requirements in the TDM Ordinance (LAMC 12.26 J). All collected penalties will be used for the City's administrative costs related to the TDM Program and/or on City-funded VMT-reduction strategies.[38]

[38] Detailed penalty information can be found in LAMC 12.26 J (TDM Ordinance).

Draft Program Guidelines

Chapter 6: TDM Program Updates

6.1 Program Evaluation and Amendments

During the development of this program, staff and the research team analyzed best practices from around the nation, reviewed research to determine the relative level of effectiveness of each strategy to reduce drive alone trips or VMT, and assigned point values for the relative effectiveness of each strategy as demonstrated through the research. In order to maintain a modern and effective program, strategies, processes, and standards will be reviewed annually by staff. These reviews will include the evaluation of monitoring reports from projects to assess the relative effectiveness of TDM strategies. LADOT staff will also continue to stay abreast of new research and best practices locally, nationally, and internationally in order to update and improve the TDM program over time.

6.1.1 TDM Strategies

This type of evaluation can provide a wealth of information on the effectiveness of various TDM strategies. Based on this analysis, strategies may be added or removed based on new research and/or information provided in the project monitoring reports for projects subject to the City's TDM program. If the list of qualified strategies is amended, projects may continue to operate the agreed upon strategies at the time the project was approved, or they may revise their list of selected strategies when submitting their TDM Documentation with strategies worth an equivalent or greater number of points.

Future TDM Strategies

The TDM strategies list in Chapter 4 is intended to evolve over time and adjust to meet Program goals. There are some strategies LADOT would like to include as part of the TDM Program that currently do not have the infrastructure or sound methodology for evaluation established. As the implementation of these strategies becomes more feasible, the following TDM strategies could be included in the TDM Program.

Table 19: Future TDM Strategies

Future TDM Strategy	Description	Challenges
Mobility Hubs	Continue to support the Mobility Hub program by contributing a physical location or programmatic services.	Mobility Hub program under development.
Healthy Food Retail	Locating a certified healthy food retail on the project site.	No healthy food retail certification program is established at this time.
Cargo Bike Shared Fleet	Provide a fleet of shared cargo bikes and/or electric cargo bikes to support a greater variety of non-motorized trip purposes like retail, food pick-up, goods delivery. recreation, equipment, or transporting children and pets.	No current programs in place to demonstrate effectiveness.
VMT Exchange or VMT Mitigation Bank	Contribute to a VMT Exchange and/or VMT Mitigation Bank program to support off-site TDM	Additional technical evaluation and governing structure needs to be established to administer a VMT

	strategies or mobility investments that reduce neighborhood or regional level VMT and vehicle trips.	Exchange and/or VMT Mitigation Bank.

New TDM strategies implemented through this program either through LADOT or user-defined strategies may also be considered as mitigation measures under CEQA and in compliance with SB 743. These strategies would be reflected in the updates to the City of Los Angeles VMT Calculator maintained by LADOT.

6.1.2 Future Amendments

Projects that are past the approval stage will not be subject to Program Guidelines amendments and updates. Any updates to the Program Guidelines, forms, or reference materials will be published on the LADOT website.

Draft Program Guidelines

Appendix A: Glossary of Common Terms

Affordable Housing: A residential project that includes a certain percentage of affordable dwelling units. An affordable dwelling unit is a dwelling unit which is restricted by a covenant certified by the City of Los Angeles Housing and Community Investment Department or its successor agency to be rented or sold at an affordable level to, and occupied by, persons or families whose annual income does not exceed 120 percent of the Area Median Income for persons or families residing in Los Angeles County. The Area Median Income and affordable housing costs shall be established from periodic publications of the United States Department of Housing and Urban Development, as determined by the California Department of Housing and Community Development or its successor or assignee.

Average Vehicle Ridership (AVR): The total number of employees (including those telecommuting) reporting to work during a work day over a five-day period (Monday through Friday), divided by the number of vehicles driven by these employees between home and the work site over that five-day period.

Disadvantaged Area: Reference LADOT's Equity-Focus Mobility Development Districts as defined and mapped per Council File (CF) 17-1125.

Employee Transportation Coordinator (ETC): ETCs play a leading role in delivering commuter benefits to the members of a company or organization's workforce. They also develop, implement, and update commuter programs and policies, and serve as internal and external "point people". They may also serve as the project's TDM Coordinator.

Generalized Citywide Parking Baseline: The parking requirements in section 12.21 A.4 of the Los Angeles Municipal Code for each applicable use not taking into consideration other parking incentives that would apply, or local development regulations as required in a Specific Plan.

Greenhouse Gasses (GHG): A gas that contributes to the greenhouse effect by absorbing infrared radiation, e.g., carbon dioxide and chlorofluorocarbons.

High Injury Network (HIN): The High Injury Network (HIN) is the network of streets with the highest concentration of severe injuries and deaths, with an emphasis on those involving people walking and bicycling.

High Occupancy Vehicle (HOV) Parking: Designated parking spaces for carpool or vanpool vehicles.

Hotel: Any public or private floor space or structure, including but not limited to, any inn, hostelry, tourist home, motel, lodging house or motel rooming house offering space for sleeping or overnight accommodations in exchange for rent and for a period of less than 30 days. Hotel includes the parking lot and other common areas of the hotel. Hotel does not include living accommodations provided at any governmental or nonprofit institution in connection with the functions of that institution (L.A.M.C. 41.49).

Institute of Transportation Engineers (ITE): The Institute of Transportation Engineers (ITE) is an international educational and scientific association of transportation professionals who are responsible for meeting mobility and safety needs.

Microtransit: Unlike a standard bus, microtransit is used for short trips under approximately 20 minutes in duration in a defined service zone. The service will accept real-time requests for pick-ups and drops-offs to generate the most efficient possible shared trips for customers.

Mixed Use: Projects that have a mix of land use where no more than 85% of the total floor area is a single land use.

Parking Requirement / Code Parking Requirement: The base number of parking spaces required by the L.A.M.C. or as defined by a Specific Plan, prior to accounting for any potential parking reductions, such as through the Density

Draft Program Guidelines

Bonus program, the Transit-Oriented Communities (TOC) program, bicycle parking ordinance, and/or area-specific parking reductions.

Base Point Target: Base Point Targets are assigned based on a project's TDM Project Level, which relates to project size and land use. Smaller projects may not be able to implement as many TDM strategies as larger projects and therefore have lower base Point Targets.

Point Target: Total number of points a project must meet by selecting qualified TDM strategies from a menu of options. Furthermore, projects that provide parking above the default amount required by the code will have their Point Target increase, specifically, for every 10% of additional spaces provided above the parking requirement, a project's Point Target increases by 2 points, up to a maximum of 10 additional points per project or a total of 35 points, whichever is lower.

Residential Unit: Dwelling unit or joint living and work quarters; a mobile home, as defined in California Health and Safety Code Section 18008; a mobile home lot in a mobile home park, as defined in California Health and Safety Code Section 18214; or a Guest Room or Efficiency Dwelling Unit in a Residential Hotel.[39]

Responsible Reporting Entity: Individuals or organizations that are responsible for the long term conformance of the TDM Program including, but not limited to project applicants or property owners, property managers, tenants.

Shared Micro-Mobility: A fleet of human or electric powered lightweight vehicles, such as electric scooters, bicycles, or electric bicycles that may be borrowed as part of a self-service rental program in which people rent vehicles for short-term use, typically through a mobile application.

Single Occupancy Vehicle (SOV): A personal car that is transporting one person, the driver. Also known as a drive alone trip.

Sustainable Travel Options (Non-drive alone): modes of transportation that discourage drive alone trips.

Transportation Assessment Guidelines (TAG): LADOT guidelines that provide direction on how to analyze transportation impacts using vehicle miles traveled (VMT) and conduct local operational analyses to evaluate how projects affect the access, circulation, and safety of all users of the transportation system.

Transportation Demand Management (TDM): The aim of TDM is to improve mobility options by improving accessibility and reducing reliance on drive alone trips. Holistic implementation of TDM strategies can alter travel behavior in the long run and produce positive benefits to communities, such as improvement in transportation happiness, air quality, health, and quality of life.

Transportation Demand Management (TDM) Coordinator: A TDM Coordinator coordinates with the City and the property owner and/or property manager to demonstrate the project's compliance with the approved TDM Plan.

Transportation Management Organization (TMO): TMOs are formal membership organizations of employers, property owners, residents, and other stakeholders that allow for the pooling of resources to offer more transportation options for its members. TMOs typically implement marketing and engagement activities to promote sustainable transportation options, and to encourage an increase in the use of transit, carpooling, vanpooling, bicycling, walking and scooting within a defined area. TMOs offer monitoring assistance and may vary widely in size, organization, membership, and services offered.

Transportation Network Company (TNC): Transportation Network Companies (TNCs), or driver-for-hire companies, provide on-demand transportation services using an app-enabled platform (such as smartphone apps) that connect drivers using their personal vehicles with passengers, in exchange for compensation.

[39] https://planning.lacity.org/policyinitiatives/Housing/DB_Ord.pdf

Draft Program Guidelines

Transit Oriented Communities (TOC) Program: City of Los Angeles TOC Affordable Housing Incentive Program developed pursuant to voter approved Measure JJJ. TOC Guidelines are available on the Department of City Planning website (L.A.M.C. 12.22 A.31).

Vehicle Miles Traveled (VMT): VMT is a calculation of the amount of driving generated from a project site measured in total distance (miles), per capita and per employee, or per service population.

Draft Program Guidelines

Appendix B: Findings from Planning Studies and Literature

This appendix summarizes key findings and statistics from relevant planning case studies and empirical research. These findings demonstrate the effectiveness of qualified TDM strategies at reducing vehicle miles traveled and achieving other desired outcomes outlined in the Transportation Demand Management Program Guidelines. This appendix describes and cites the technical research used to develop the TDM Program, drawing from sources including in the Appendix of "Modernizing Mitigation: A Demand Centered Approach" published by the University of Wisconsin State Smart Transportation Initiative (SSTI).[40]

TDM Strategies Research Findings Summary

Affordable Housing

The TDM program awards points to residential projects that provide on-site restricted affordable units, based on income categories defined in the City of Los Angeles Transit Oriented Communities (TOC) Program or California's Density Bonus Law

Not only is the construction and preservation of affordable housing an important goal of the City of Los Angeles, but affordable housing also generates fewer trips and VMT than comparable market-rate housing. Empirical research demonstrates that lower income households drive less and rely on transit more than higher income households. Households with incomes at or below 80 percent of the regional median income generally make fewer trips by automobile than households with higher incomes, resulting in reduced drive alone trips, and greater reliance on transit, biking, and walking. Transform and the California Housing Partnership Corporation estimate that extremely-low-income housing within a quarter mile of transit generates 37 percent fewer VMT than moderate-income housing; very-low-income housing generates 29 percent fewer VMT; and low-income housing generates 20 percent fewer VMT.[41] However, CAPCOA calculates a 0.04 - 1.2 percent VMT reduction from affordable housing.[42] A recent survey of affordable housing in Los Angeles for LADOT supports high VMT reducing estimates; the average number of daily trips generated by 42 affordable housing developments of various types was about one third of the standard ITE apartment trip daily trip rate. All but one subcategory of surveyed affordable housing types and time periods were also lower.[43] Likewise, the Center for Neighborhood Technology

[40] State Smart Transportation Initiative (SSTI), "Modernizing Mitigation: A Demand Centered Approach," September 2018, Appendix, https://ssti.us/modernizing-mitigation/.
[41] City and County of San Francisco, "Transportation Demand Management: Technical Justification," June 2016, last updated January 22, 2018, http://default.sfplanning.org/transportation/tdm/TDM_Technical_Justification_update2018.pdf, 26.
[42] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 176.
[43] Tom Gaul and Cary Bearn, "Infill and Complete Streets Study: Task 2.1A: Local Affordable Housing Trip Generation Study," 3, 6.

found that California low-Income households drive 10 percent less than average, very-low-Income households drive 25 percent less, and extremely-low-income households drive 33 percent less (55 percent less in transit-rich areas).[44]

The table in Appendix C describes the Affordable Housing TDM strategies, their respective TDM points and which land uses are most compatible with each TDM strategy. Only one Affordable Housing TDM strategy can be applied per project.

In each TDM strategy, a Housing Development shall provide on-site Restricted Affordable Units[45] at a rate of at least the minimum percentages described in Appendix C. The number of on-site Restricted Affordable Units shall be calculated based upon the total number of units in the final project.

The strategy descriptions in Appendix C should be calculated in the same manner as the City of Los Angeles Transit Oriented Communities Program or California's Density Bonus Law—i.e., manager's unit(s) and additional units permitted under such programs are excluded. Projects that qualify for this TDM strategy also are classified in Project Level 1 (unless other land uses on-site fall into a higher project level).

Demonstrated VMT reduction: 0.04% - 37%

Bicycle Facilities

Projects located near an existing bicycle facility or that provide a bicycle facility near a project site can reduce drive alone trips and reduce VMT. The effects of these facilities are especially impactful when multiple bicycle facilities or services are implemented cohesively. Therefore, points are awarded for individual strategies and bonus points are awarded for implementing multiple bicycle-related strategies. The following sections detail the research justifications for each strategy related to bicycle facilities.

Bike Share Programs

Bike share is a newer VMT reduction strategy in the U.S.; thus, limited studies have examined bike share's effects on VMT. Fehr and Peers reported a 0.2 percent VMT reduction when projects located within 1,000 feet of a bike share station and a 1.1 percent VMT reduction when projects provide residents or employees bike share memberships.[46] CAPCOA notes that "bike sharing programs have minimal impacts when implemented alone. This strategy's effectiveness is heavily dependent on the location and context" and should be coupled with other

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[44] Gregory L. Newmark and Peter M. Haas," Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy," http://www.cnt.org/sites/default/files/publications/CNT%20Working%20Paper%20revised%202015-12-18.pdf.

[45] For the purposes of this section, affordable means that rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income of Extremely Low, Very Low or Low Income households, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD) or any successor agency, as verified by the Los Angeles Housing and Community Investment Department (HCIDLA). Projects shall record a covenant acceptable to HCIDLA that reserves and maintains the total number of Dwelling Units as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy.

[46] San Francisco, "TDM Technical Justification," 26.

complementary bicycle TDM strategies, particularly infrastructure.[47] Results from other cities show bike share's effectiveness. In Minneapolis, 23 percent of bike share trips replaced driving; in Denver, 43 percent of trips replaced driving;[48] and in D.C., bike share reduced 198 VMT per person per year.[49]

Bicycle Parking

Existing research finds that bicycle parking is an effective, small-scale measure that depends on other coordinated bicycle strategies to impact VMT reduction. According to CAPCOA, bicycle parking reduces VMT by 0.63 percent in non-residential locations. However, the analysis notes that bike parking should be grouped with other bicycle infrastructure for the greatest impact.[50] Meanwhile, the TDM program of the City and County of San Francisco awards points to bike parking equivalent to up to a four percent reduction in VMT, depending on surrounding land uses.[51] A California Air Resource Board literature review finds a correlation between bicycle parking and bicycle use: a 1 percent increase in perceived bicycle parking availability leads to a 0.83 percent increase in the likelihood of biking.[52] In Chicago, a study of bike-and-rides at nine commuter rail stations found that bicycle parking increased bicycle use and reduced approximately 1,740 VMT per day.[53]

Showers, Lockers, and Other On-site Bike Facilities

Showers, lockers, and other on-site bicycle facilities have been shown to be an effective element to a project site implementing a package of bicycle strategies. Alone, however, these facilities reduce VMT by less than one percent.[54]

Demonstrated VMT reduction:

- 1.1% (bike share memberships)
- 0.2% (within 1,000 feet of a bike share station)
- 0.625% - 4% (bicycle parking)
- 0.625% (showers, lockers and other on-site facilities)

Factors affecting benefits:

- Benefits depend on implementation with other coordinated bicycle strategies.

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[47] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 256.
[48] SSTI "Modernizing Mitigation: A Demand Centered Approach" 40.
[49] Kristine Johnson, "Beyond Urban Planning: The Economics of Capital Bikeshare," Georgetown Public Policy Review, Apr. 7, 2014, http://gppreview.com/2014/04/07/beyond-urban-planning-the-economics-of-capital-bikeshare/.
[50] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 202.
[51] San Francisco, "TDM Technical Justification," 25-6.
[52] Susan Handy, Gil Tal, and Marlon G. Boarnet, "Impacts of Bicycling Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions," Sept. 30, 2014, https://www.arb.ca.gov/cc/sb375/policies/bicycling/bicycling_brief.pdf, 5.
[53] Richard H. Pratt, John E. Evans IV, Herbert S. Levinson, Shawn M. Turner, Chawn Yaw Jeng, and Daniel Nabors, "Pedestrian and Bicycle Facilities," Chapter 16 in Traveler Response to Transportation System Changes, 3rd Edition (Washington: Transportation Research Board, 2012), 16-388.
[54] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 235.

Draft Program Guidelines

Car Sharing

Access to car sharing has proven to reduce auto use—modestly in the short term but more so over the longer term commensurate with the reliability of the car share program and availability of vehicles. Car share refers to a shared fleet of cars available on a specific project site to all building users, residents or employees. Typically car trips are round trip, where a car is checked out from a specific location and returned to that location at the conclusion of a user's trip.

Research suggests that one car share parking space and vehicle should be made available for every 50-200 units of a building[55] and a minimum of two car share parking spaces and vehicles for 201 units or more. Number of car share spaces and vehicles should be adjusted based on usage.[56] Car-share programs can reduce VMT and enable the benefits of auto travel without the burden of car ownership. CAPCOA calculates a 0.4 - 0.7 percent VMT reduction for providing car share.[57] In the short term, Oregon's Department of Transportation found a short-term 0.05 - 0.2 percent VMT reduction, with a possible increase to 1.7% with increased funding and implementation.[58] An Urban Land Institute study found a 0.33 percent reduction from shared cars in urban areas.[59] Meanwhile, a study in San Francisco demonstrated that providing residents or employees with car-share memberships could reduce VMT by 4.1 percent, and creating on-site car-share parking could lower VMT by 0.5 percent.[60] Among car-share members alone, VMT reductions are greater: 38 percent over two years and 67 percent over four, with preferred parking. Each member reduces their daily travel by seven VMT on average.[61] Finally, two studies found that each car-share vehicle takes 7 - 11 autos or 9 - 13 autos off the road, respectively,[62] though the studies may not be generalizable beyond car-share service areas.[63] Peer-to-peer car sharing, however, has not proven to reduce VMT and therefore does not qualify to receive points through this program.

Demonstrated VMT reduction:

- 0.05% - 4.1% (car-share memberships)
- 0.5% (car-share spaces)

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55 https://www-static.bouldercolorado.gov/docs/Boulder_Car_Share_Sept._2015_DRAFT_Carshare_Policy_Review_and_Recommendations-1-201509181402.pdf pg. 12

56 http://www.ccdcboise.com/wp-content/uploads/2016/02/Document-D3-City-Carshare-Best-Practices.pdf

57 CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 245.

58 "Carsharing," Oregon Department of Transportation Greenhouse Gas Emissions Reduction Toolkit, https://www.oregon.gov/ODOT/Planning/Documents/Mosaic-Carsharing-Programs.pdf, 3.

59 Cambridge Systematics, Inc., Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions, Jul. 2009, http://www.reconnectingamerica.org/assets/Uploads/2009movingcoolerexecsumandappend.pdf, B-52.

60 San Francisco, "TDM Technical Justification," 27.

61 Robert Cervero, Aaron Golub, and Brenda Nee, "San Francisco City CarShare: Longer-Term Travel-Demand and Car Ownership Impacts," 2006, 25, 38.

62 Susan Shaheen and Elliot Martin, "The Impacts of Car2go on Vehicle Ownership, Modal Shift, Vehicle Miles Traveled, and Greenhouse Gas Emissions: An Analysis of Five North American Cities," Jul. 2016, http://innovativemobility.org/wp-content/uploads/2016/07/Impactsofcar2go_FiveCities_2016.pdf, 4 and Elliot Martin and Susan Shaheen, "The Impact of Carsharing on Household Vehicle Ownership," ACCESS 38 (Spring 2011): 27, http://sfpark.org/wp-content/uploads/carshare/access38_carsharing_ownership.pdf.

63 Robert Poole, "The Impact of Car-sharing on Vehicle Ownership," Reason Foundation, https://reason.org/transportation-news/surface-transportation-news-155/#e.

Draft Program Guidelines

Factors affecting benefits:

- Benefits may depend on a project site locating within or near a car-share service zone.

Child Care

On-site child care at a workplace or residential development can reduce VMT and make daily travel patterns more convenient and efficient for those responsible for caring for a child. By eliminating the need for a separate or farther trip to childcare, on-site childcare options reduce miles traveled. To date, the VMT impact of on-site childcare has not yet been quantified by academic studies. However, the American Planning Association (APA) has stressed the importance of providing adequate child care and locating these facilities near work or home. The APA argues that well-placed child-care facilities can shorten auto trips or shift travel from driving to other modes. San Francisco's TDM program grants points to on-site child care equivalent to a two percent reduction in VMT.[64] LADOT will evaluate the potential VMT reduction of child care programs where this strategy is selected via the TDM ordinance.

While limited research is available documenting the VMT-mitigating effects of on-site child care, eliminating the need for a separate or longer distance trip to childcare by a parent or caretaker could reduce trips and total driving. A well-placed child care facility closer to home or work can shorten auto trips or shift travel from driving alone to other modes of transportation. Qualifying child care facilities must be licensed under the Child Care Licensing Program through the California Department of Social Services.[65]

Demonstrated VMT reduction:

- VMT benefits are not yet quantified in substantial literature.

High-Occupancy Vehicles

High-occupancy vehicle (HOV) incentives, also referred to as Commute Trip Reduction strategies are well-studied and remain integral parts of many TDM Programs. HOV strategies include a variety of strategies that replace drive alone trips for a trip with multiple riders in one vehicle. These strategies utilize one vehicle as a resource to many, whether it is sharing a personal vehicle with others in a carpool, or coordinating a program similar to a school bus program geared toward coordinating children attending the same school to reduce the number of overall trips for all students and their families. The effectiveness in reducing VMT varies based on the land use context as well as program efficiency and/or convenience of use. The following sections detail the research behind the TDM program's High-Occupancy Vehicles strategies.

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[64] San Francisco, "TDM Technical Justification," 28.
[65] Child Care Licensing Program, California Department of Social Services. http://www.cdss.ca.gov/inforesources/Child-Care-Licensing/How-to-Become-Licensed.

Draft Program Guidelines

Ride-matching, Carpool Programs, and HOV Parking

High-occupancy vehicle (HOV) programs like ride-matching, carpool, and vanpool programs have substantive yet varied effects on VMT. According to CAPCOA, ride-matching programs like coordinating carpools and reserving parking spaces for HOVs could provide a 1 - 15 percent reduction in VMT, depending on the land-use context.[66] At a larger scale, a regional carpool-matching program in Portland, Oregon reduced VMT by 0.07 - 0.1 percent.[67] Reserved spaces for high-occupancy vehicles also can reduce VMT, but its VMT benefits are not yet quantified in substantial literature.[68]

Guaranteed Return Trip

Guaranteed return trip programs—also called guaranteed ride home programs—are effective as part of suites of employee commute TDM packages. The individual VMT impact of guaranteed return trip programs have not yet been quantified. However, a New York study found that 16 percent of express bus riders sampled would stop riding without a guaranteed return trip program, and a Denver study concluded that guaranteed return trip raises carpool rates by 17 percent.[69] An Alameda County, California guaranteed return trip program with 2,179 enrollees reduced 16,404 VMT per workday.[70]

HOV Program

Establishing school carpool programs for getting students to and from school can be a quite effective strategy at reducing school VMT. CAPCOA calculates that school carpool programs could reduce VMT by 7.2 - 15.8 percent, depending on the degree of implementation and aggressiveness of securing participation.[71]Similar findings could be found for non-school uses, though limited research has been conducted on residential and employment sites.

Trip-Reduction Programs

Required trip-reduction programs combine a number of other proven strategies, particularly high-occupancy vehicle strategies, to reduce VMT. CAPCOA calculates that such programs reduce VMT by 4.2 - 21.0 percent.[72]

Demonstrated VMT Reduction

- 1% - 15% (ride-matching, carpool programs, and HOV parking)
- 7.2% - 15.8% (school carpool program)
- 4.2% - 21.0% (required trip-reduction program)

Factors affecting benefits:

- Benefits may depend on density and land-use context.
- Benefits vary by degree of implementation.

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[66] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 227-8.
[67] Oregon Department of Transportation, "Ridesharing," 2, accessed February 27, 2017 http://www.oregonmosaic.org/files/30.pdf
[68] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 244.
[69] William B. Menczer, "Guaranteed Ride Home Programs: A Study of Program Characteristics, Utilization, and Cost," Journal of Public Transportation 10, no. 4 (2007): 143, https://nctr.usf.edu/jpt/pdf/JPT%2010-4%20Menczer.pdf.
[70] Alameda County Transportation Commission, "Guaranteed Ride Home Program Evaluation: Final Report," 2014, http://grh.alamedactc.org/wp-content/uploads/2015/08/Eval_FINAL_web.pdf, 1-2, 5-1.
[71] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 250.
[72] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 223.

Draft Program Guidelines

Information

Providing transportation information for users of a project site can help to improve awareness of available mobility options and reduce VMT. There is strong evidence that outreach and education have significant effects on travel behavior by providing project site users the information needed to make transportation choices based on their needs. Research on real-time transit information, education and marketing, and wayfinding have found moderate reductions of auto use. The following sections summarize the research on different information-based TDM strategies.

Real-time Transit Information Displays

Real-time transit information displays provide residents, employees, and customers with valuable information and certainty on their transit trip. Real time information also helps people make informed choices on whether to wait or use another mode - like bike share or walking - that can make the entirety of the trip more efficient. The VMT effects of displays have not yet been quantified, but a number of studies have found that transit riders perceive waiting and transfers as far longer than in-vehicle time. These studies found that time spent waiting feels three times longer than normal, on average, and up to 4.5 times longer at worst, depending on characteristics of the wait. Transit displays, however, bring down that perception of wait time to only 1.5 times longer than normal.[73] One study in Seattle found that real-time transit displays reduced perceived wait time by 13 percent and actual wait time by two minutes. Another study from Chicago saw a two percent increase in transit ridership after displays were added.[74]

Wayfinding

Wayfinding literally points the way towards alternative transportation options. As with some other strategies, though, the independent VMT effects of wayfinding has not yet been studied and is likely small. San Francisco's TDM program grants points to providing wayfinding on-site equivalent to about a one percent reduction in VMT.[75]

Education, Marketing, and Outreach

Education, marketing, and outreach at various levels can have a measurable, though often small, impact on reducing VMT. CAPCOA calculates a 0.8 - 4.0 percent reduction in VMT, depending on the percentage of employees eligible.[76] On the higher end, individual studies have found much greater reductions. A Portland, Oregon outreach and education program recorded a 9 - 13 percent reduction in solo driving trips among surveyed residents in the

[73] Brian D. Taylor, Hiroyuki Iseki, Michael Smart, Allison Yoh, "Thinking outside the Bus," *ACCESS* 40 (Spring 2012): 11, 14, https://www.accessmagazine.org/wp-content/uploads/sites/7/2016/01/access40_outsidethebus.pdf.
[74] SSTI "Modernizing Mitigation: A Demand Centered Approach" 43.
[75] San Francisco, "TDM Technical Justification," 29.
[76] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 240-1.

program area[77] and a 10.4 percent reduction in solo driving trips among new residents.[78] A comprehensive marketing, education, and outreach program in Arlington, Virginia reduced VMT by 39 percent,[79] and a Seattle best-practices report calculates a 21 percent increase in transit ridership due to education, marketing, and outreach.[80]

Voluntary Travel Behavior-Change Programs and School Safety Campaigns

Similar to required trip-reduction programs, voluntary travel behavior-change programs incorporate a range of other proven strategies to reduce VMT, on a voluntary basis. CAPCOA estimates that such programs reduce VMT by 1.0 - 6.2 percent.[81] Similarly, school safety campaigns are the equivalent programs to voluntary travel behavior-change programs as they educate staff, students and families of alternative modes of transportation to travel to school other than a vehicle trip. These campaigns are key features in the Safe Routes to School programs.

Demonstrated VMT reduction:

- *0.8% - 4.0 % for percentage of employees eligible (education, marketing and outreach)*
- *39% where there is active participation in a regional TDM program*
- *1.0% - 6.2% (voluntary travel behavior-change program)*

Mixed-Use

Research has shown that mixed-use developments reduce automobile trips by internally capturing some trips that would otherwise be made by automobile. Live-work, live-shop and shop-work arrangements can replace an additional long-distance driving trip with a shorter walking trip. These developments may also change the travel behavior of those living nearby, and not solely the residents of the new building.

Mixed-use development (projects that provide no more than 85% of floor area for a single land use) concentrates land uses of different types in close proximity to one another or on the same project site, minimizing the need for and distance of vehicle trips. Also known as diversity of land uses, this measure reduces VMT by approximately 9 - 30 percent, according to CAPCOA.[82] These reductions can be significant, though often ill-captured by standard

[77] Linda Ginenthal, "Portland Smart Trips," *Pedestrians and Bicycle Information Center*, Oct. 27, 2007, http://www.pedbikeinfo.org/data/library/details.cfm?id=3961.
[78] Jay Kassirer, "Portland's Smart Trips Welcome Program," *Tools of Change*, 2018, http://www.toolsofchange.com/en/case-studies/detail/658.
[79] Arlington County Government, "Reduction in SOV Trips," *Arlington, Virginia*, 2018, https://transportation.arlingtonva.us/key-performance-measures/mobility/reduction/.
[80] Seattle Department of Transportation, "Best Practices in Transportation Demand Management" (Seattle, WA, January 2008), 7C–2-3, https://www.ctc-n.org/files/resources/07_seattle_best_practices_in_transportation_demand_management.pdf
[81] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 218.
[82] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 162.

trip-generation models. The Environmental Protection Agency (EPA) has developed a tool to estimate the unique impacts of mixed-use development on trip generation.[83]

Demonstrated VMT reduction:

- 9% - 30%

Mobility Investment

TDM strategies in the Mobility Investment improve neighborhood accessibility by funding physical improvements that encourage walking and bicycling to nearby destinations or off-set costs to operate publically available mobility services. Such destinations may include local retail, transit stations, neighborhood services and institutions (including groceries and schools). Enhancements to the accessibility of pedestrian and bicycle facilities have demonstrated influence over incremental shifts in travel behavior. Unlike other TDM strategies which target building occupants, off-site mobility investments are typically implemented in the public right-of-way and provide benefits beyond a project site. Their greater relative point value reflects the potential to affect transportation behavior change for users over a greater neighborhood area.

Empirical research suggests that mobility investments that improve accessibility for people who bike and walk, specifically those that improve connectivity and user comfort, have powerful vehicle-trip reduction outcomes over time due to a multiplier effect. CAPCOA reports that improving the connectivity of pedestrian facilities may increase the proportion of all trips completed by walking by about 2 percent.[84] Additionally, the Oregon Sustainable Transportation Initiative reports that neighborhoods with complete pedestrian networks experience at least a 2 percent reduction in area VMT.[85]

TDM credit for mobility investment strategies are conditional on LADOT review, which may impact the timeline of the review process and TDM Program compliance. Projects required by the L.A.M.C. or the LADOT Transportation Assessment Guidelines (TAG) to implement any of the following strategies that improve site access by people that walk, bike and take transit will also receive credit in the TDM Program.

Demonstrated VMT reduction:

- 3.0% - 21.3% (improve pedestrian and overall design)
- 0.5% - 24.6% (improve bicycle and pedestrian access to transit)
- 0.5% - 2% (create pedestrian network improvements)
- 0.25% - 1.00% (create traffic calming strategies)
- 0.625% (locate near bicycle lane)

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[83] United States Environmental Protection Agency, “Mixed-use Trip Generation Model,” United States Environmental Protection Agency, https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model.
[84] California Air Pollution Control Officers Association et al., “Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures,” Aug. 2010, http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, 171, 181-2, 186-90, 200, 206, 275.
[85] Oregon Sustainable Transportation Initiative, “Oregon Greenhouse Gas Reduction Toolkit: Strategy Report: Pedestrian Environment,” https://www.oregon.gov/ODOT/Planning/Documents/SR-Pedestrian-Environment.pdf, 1.

Draft Program Guidelines

Factors affecting benefits:

- Benefits depend on how strategies are interrelated and complement one another.
- Benefits increase when located on pedestrian and bicycle networks.
- Benefits vary by density and land-use context.

Parking

There is strong evidence that parking management techniques directly impact transportation behavior choices and mitigate vehicle and parking demand. Currently, the price of parking is often invisible as it is lumped into other costs and passed onto building occupants and consumers. Disentangling the cost of parking from other costs, by pricing parking or unbundling its costs from rent, can create more equitable solutions for low-income residents who may own fewer or no automobiles. Parking cash out (for employment uses) is especially effective in reducing drive alone trips to employment centers. It is anticipated that over time, parking TDM strategies will increase the efficient utilization of parking supply and accessibility. The following sections discuss the research underlying each parking-related strategy in the TDM program.

Pricing Parking

Charging for parking reduces VMT and can be applied in a variety of ways as outlined below. Donald Shoup's *The High Cost of Free Parking* describes the positive effects on vehicle travel by pricing parking, especially in high-turnover areas near businesses.[86] One study of Hartford, Connecticut found that workplaces with free parking had 83 - 95 percent of workers drive alone to work, while a workplace that charged for parking reduced that share to 71 percent.[87] Another report found that priced parking, as part of a broader workplace TDM program, can reduce driving alone by 12 to 40 percent.[88]

CAPCOA calculates that pricing off-street, workplace parking can reduce VMT by 0.1 - 19.7 percent.[89] A Transit Cooperative Research Program report finds pricing parking near high-quality-transit areas reduces VMT by 36 percent; however, pricing parking near low-quality-transit areas only reduces VMT by 10 percent.[90] A study for the Washington State Department of Transportation found that an increase in price from about $0.28 per hour to $1.19 per hour reduced VMT by 11.5 percent.[91] However, if street parking nearby were free and plentiful, drivers may

[86] Donald C. Shoup, *The High Cost of Free Parking*, updated edition (2011; London: Routledge, 2017).
[87] Christopher McCahill and Norman W. Garrick, "Losing Hartford: Transportation Policy and the Decline of an American City" (paper presented at the 18th Annual Meeting of the Congress for the New Urbanism, Atlanta, GA, 2010), https://pdfs.semanticscholar.org/9b72/5244e6760aa5efba3b11c6ebafac4de23952.pdf, 6-7.
[88] Thomas J. Higgins, "Demand Management in Suburban Settings: Effectiveness and Policy Considerations," *Transportation* 17 (1990): 101.
[89] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 261.
[90] Erin Vaca and J. Richard Kuzmyak, "Parking Pricing and Fees," chapter 13 in *Traveler Response to Transportation System Changes Handbook*, 3rd Edition (Washington: Transportation Research Board, 2005), 13-6.
[91] Lawrence D. Frank, Michael J. Greenwald, Sarah Kavage, and Andrew Devlin, "An Assessment of Urban Form and Pedestrian and Transit Improvements as an Integrated GHG Reduction Strategy" (WSDOT Research Report WA-RD

continue to drive at the same rates and just park for free nearby. Thus, the benefits of parking pricing depend to a large degree on the lack of on-street parking supply surrounding the site (for example, where public on-street parking outside the building is metered or restricted).[92]

Unbundling Parking

Unbundled parking reduces VMT by separating parking costs from property or rent costs. CAPCOA identifies the range of VMT reduction from unbundling as 2.6 to 13 percent.[93] A San Francisco study suggests 4.5 percent maximum VMT reduction in urban areas. The benefits of unbundling depend, in large part, on the availability and price of nearby street parking. If street spaces are free and widely available, auto-owners may choose to save on rent, forgo an off-street space, and park for free on-street. Therefore, metered/priced parking or residential parking permit districts are necessary to ensure that unbundling effectively reduces car ownership and/or VMT.[94]

Parking Cash-out

Parking cash-out is an effective strategy for reducing VMT. It also has a dual benefit of creating a more efficient utilization of existing parking facilities. CAPCOA estimates that parking cash-out reduces VMT by approximately 0.6 to 7.7 percent.[95] The City and County of San Francisco estimates about a one percent reduction for very dense, urban areas where little parking is free.[96] On the other hand, after California enacted its parking cash-out law, VMT fell 12 percent among surveyed employees,[97] and the share of employees driving alone fell from 76 to 63 percent. The state estimated that its cash-out law can reduce commuter VMT by 113 million to 226 million miles annually.[98]

If adjacent street parking is free and widely available, the benefits of cash-out are minimized. Employees could receive parking cash-outs and select to park for free nearby. Therefore, where parking is demonstrated to be highly used, metered parking, priced parking, and/or residential parking permit districts may help ensure the effectiveness of the cash-out measure. In addition, if the employer leases their office floor space or parking, the benefits of cash-out can increase if the building landlord or manager unbundled parking from the employer's lease. In those cases, employers can save money by leasing fewer spaces when cash-out reduces demand for parking.[99]

Shared Parking

Shared parking between multiple buildings or uses can reduce VMT.[100] Shared parking on a single lot or garage is reducing the parking supply for each building served, as compared to having individual parking lots or garages. On a mixed-use development site, shared parking can help to reduce the total number of parking to ensure efficient use of the spaces for multiple uses that may activate during different times of the day.

765.1, Research Project Y-10845, Olympia, WA, Apr. 1, 2011), http://www.wsdot.wa.gov/research/reports/fullreports/765.1.pdf, 34.

[92] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 261.

[93] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 210.

[94] San Francisco, "TDM Technical Justification," 31.

[95] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 266.

[96] San Francisco, "TDM Technical Justification," 32.

[97] Vaca and Kuzmyak, "Parking Pricing and Fees," 13-18, 13-39.

[98] Donald Shoup, "Here's an Easy Way to Fight L.A.'s Traffic and Boost Transit Ridership—Reward Commuters who Don't Drive," *Los Angeles Times*, Mar. 28, 2017, http://www.latimes.com/opinion/livable-city/la-ol-shoup-dtla-parking-cash-out-20170328-story.html.

[99] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 266.

[100] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 207.

Draft Program Guidelines

Public Parking

Public parking, or providing on-site parking spaces to the public, reduces private parking supply for the building, while also providing a community benefit. Allowing public parking on-site allows the parking provided to be utilized more efficiently.

Reduced Parking Supply

Including fewer parking spaces in a project can be one of the most potent means of reducing VMT. Donald Shoup's *The High Cost of Free Parking* demonstrates the various positive effects on vehicle travel of rationalizing parking supply.[101] A New York City study found that residents with reserved spaces commuted by automobile more than those without. Residents of an outer-borough neighborhood with more reserved parking were 45% more likely to drive to work in downtown Manhattan and 28% more likely to drive in general than a comparable outer-borough neighborhood with less parking.[102] In another study, even in transit-oriented developments, parking availability affected driving patterns more than access to transit.[103] One paper looked at nine major cities over 50 years, observing that gradual parking supply increases led to large raises in the share of driving, especially for short, local trips.[104]

CAPCOA estimates a 5.0 to 12.5 percent reduction in VMT from reduced on-site parking supply where the maximum effect is assumed to be bound by a maximum 50 percent reduction in the conventional parking supply.[105] The Parking Transportation Demand Management Ordinance in Cambridge, Massachusetts reduced driving alone to work by 5.3 to 5.7 percentage points by encouraging a reduction of parking supply.[106] A strategy report from the Oregon Greenhouse Gas Reduction Toolkit calculates a 5 - 12 percent drop in VMT from parking management strategies like smaller amounts of parking.[107] Finally, San Francisco's TDM program grants points to reduced parking supply equivalent to a 1 to 11 percent reduction in VMT, depending on the number of spaces.[108] The benefits of reduced parking supply may be influenced by the supply of metered parking, nearby priced parking, or residential parking permit districts instituted to prevent spillover parking impacts on adjacent streets.[109]

Demonstrated *VMT Reduction:*

- 0.1% - 36% (pricing parking)

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[101] Shoup, *High Cost of Free Parking*.
[102] Rachel Weinberger, Mark Seaman, Carolyn Johnson, John Kaehny, "Guaranteed Parking—Guaranteed Driving: Comparing Jackson Heights, Queens and Park Slope, Brooklyn Shows that a Guaranteed Parking Spot at Home Leads to More Driving to Work," October 2008, https://www.transalt.org/sites/default/files/news/reports/2008/Guaranteed_Parking.pdf, 1.
[103] Daniel G. Chatman, "Does TOD Need the T?: On the Importance of Factors Other Than Rail Access," *Journal of the American Planning Association* 79, no. 1 (Winter 2013): 17-31.
[104] Christopher McCahill and Norman Garrick, "Parking Supply and Urban Impacts," chapter 3 in *Parking: Issues and Policies*, ed. Stephen Ison and Corinne Mulley, Transport and Sustainability vol. 5 (Bingley : UK: Emerald, 2014), 33-55.
[105] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 207-208.
[106] Cliff Cook, "2006-2010 Cambridge Journey to Work," *City of Cambridge*, 2011, http://www.cambridgema.gov/CDD/factsandmaps/transportationdata/200610jtwtable.
[107] Oregon Sustainable Transportation Initiative, "Oregon Greenhouse Gas Reduction Toolkit: Strategy Report: Parking Management," *Oregon Department of Transportation*, https://www.oregon.gov/ODOT/Planning/Documents/SR-Parking-Management.pdf, 1.
[108] San Francisco, "TDM Technical Justification," 32-3.
[109] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 207.

Draft Program Guidelines

- 2.6% - 13% (unbundling parking)
- 0.6% - 12% (parking cash out)
- 5% - 12.5% (reduced parking supply, including shared parking or public parking by 50 percent)

Factors affecting benefits:

- Benefits largely depend on a constrained supply of parking surrounding the building, such as metered and/or restricted parking in the surrounding streets.
- Benefits vary by degree of implementation.
- Benefits may depend on transit availability.
- Benefits vary by density and land-use context.
- When the employer leases their workplace or their parking from a landlord, benefits increase if the landlord unbundles parking from the employer's lease.

Shared Micro-Mobility

Shared fleets of alternative mobility devices allow users a flexible option for traveling short distances, for a fee. These shared fleets can either feature dockless capabilities or be able to lock to a designated parking spot. All shared mobility technologies must be compliant with the City of Los Angeles rules, regulations, and policies regarding each specific technology type. Any technologies not compliant will not be considered for TDM points.

New shared mobility may have comparable effects on travel patterns as bike share programs in their ability to expand the reach of transit and improve access to destinations. However, these systems are often so recently begun that their VMT impact has not yet been formally studied. The Federal Highway Administration notes that these "innovative services" have the potential to reduce VMT and auto ownership.[110]

Demonstrated VMT reduction:

- VMT benefits are not yet quantified in substantial literature.

Telecommute

Research demonstrates benefits when employment sites provide telecommuting options to employees, allowing employees to work from home rather than commuting to the office, reducing work-related VMT.[111]

The effectiveness of telecommuting to reduce VMT should be understood in context of broader regional planning goals to balance plentiful housing options near employers and other frequent destinations. Telecommuter

[110] Federal Highway Administration, Office of Operations, "Shared Mobility: Current Practices and Guiding Principles: Chapter 2: Overview of Shared Mobility Services," Federal Highway Administration, Office of Operations, Feb. 1, 2017, https://ops.fhwa.dot.gov/publications/fhwahop16022/ch2.htm.
[111] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 236.

programs are shown to reduce VMT for telecommuters on the days they work, and frequent telecommuters utilize more active transportation modes. However, a greater lack of housing near employers could lead to increased VMT over time if people do not live close to jobs or activity centers.[112] Many researchers are studying the effects of work from home policies on reducing driving as a result of the global pandemic. Additional data can help evaluate the effectiveness of this TDM strategy over time.

Demonstrated *VMT reduction:*

- 0.07 - 5.50% (commute VMT)

Transit Access

Research demonstrates strong benefits when projects provide first/last mile connections to high quality transit. This TDM program does not generally provide points for subsidizing use of TNCs except when utilized in conjunction with a sustainable one way trip option, such as guaranteed return trip and connecting to the nearest transit station. Microstransit, shuttles, taxis, and TNCs that can connect to nearby transit stations have been documented to increase confidence in transit and non-drive alone travel options by providing more choices. Improving transit speed and reliability influences decisions to use transit . To ensure the Improved Transit Service strategy will be effective, this strategy requires additional review time to determine eligibility, compatibility with existing services, and costs. The following sections discuss the research that informs the Transit Access TDM Strategies.

Operate or Subsidize Microtransit, Shuttles, TNCs, or Taxi Connections to Transit

Employer shuttles and/or subsidized ridesharing can provide alternatives to driving alone and first-mile/last-mile connections to transit and key destinations. CAPCOA estimates that employer vanpools or shuttles can reduce VMT by 0.3 to 13.4 percent, capturing 2 to 20 percent of mode share.[113] San Francisco's TDM program awards more points to shuttle buses than vanpool services because of the greater freedom that buses' longer service hours provide.[114]

Transit Subsidies/Passes

Purchasing fully or partially subsidized transit passes to employees or residents can significantly reduce VMT. A subsidy or especially an unlimited pass can lower or eliminate the marginal cost of each new transit trip. Broadly, a number of studies show lower transit fares increase transit use.[115] Regarding transit pass programs in particular, CAPCOA estimates between a 0.3 and 20 percent VMT reduction.[116] Another more focused study found a 4.2 to

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[112] Chakrabarti, Sandip. "Does telecommuting promote sustainable travel and physical activity?". Journal of Transport & Health, Volume 9. June, 2018.
https://www.ssti.us/2018/04/does-telecommuting-increase-vehicle-miles-travelled/
[113] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 253.
[114] San Francisco, "TDM Technical Justification," 29.
[115] SSTI "Modernizing Mitigation: A Demand Centered Approach" 44.
[116] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 230.

4.8% reduction in VMT.[117] These benefits vary based on the land-use context of the site, the percentage of eligible employees, and the value/size of the subsidy or pass.[118]

Improved Transit Service

Reducing transit headways and increasing service close to a development can also reduce VMT by increasing the quality of transit near the project site. More frequent buses and trains result in a more reliable transportation option. CAPCOA estimates a VMT reduction of 0.02 to 2.5% from improved transit service.[119]

Demonstrated VMT reduction:

- 0.3% - 13.4% (vanpools and shuttles)
- 0.3% - 20% (transit passes/subsidies)
- 0.02% - 2.5% (reduced transit headways and improved transit service)

Factors affecting benefits:

- Benefits from transit passes/subsidies depend on percentage of employees eligible, value of the subsidy, and density and land-use context.

Transportation Management Organizations

Transportation Management Organizations (TMOs) are tasked with managing the transportation needs of a particular coalition of major employers, property owners, plan areas, or neighborhoods. TMOs typically develop, implement, and evaluate the effectiveness of TDM strategies and encourage more sustainable, efficient transportation options to encourage the reduction of VMT.

TMOs encourage a variety of strategies that promote usage of other modes of transportation and discourage drive alone trips aiming to slow the increase of VMT based on travel choices. TMO Services may include, multimodal transportation infrastructure and services, advocacy and marketing activities, on-site outreach to employees/residents, and coordination by a TMO coordinator. Monitoring and evaluation are also core services provided by TMOs. A project may only select one of the following strategies listed below. A project can either join an existing TMO or start a new TMO. Should a project select to start a new TMO, the project must not be within an existing TMO service area and commit to a two-year membership to be awarded points.

The VMT effect of joining a Transportation Management Organization (TMO) has not yet been formally studied. However, studies have found that TMOs do shift employees from driving alone to other modes: two TMOs studied by SCAG reduced their mode share of solo driving by six and seven percent, respectively.[120] The Victoria Transport Policy Institute notes that these values can increase if other TDM strategies are implemented along with TMO

[117] "Methodology: Impact of Car Sharing Membership, Transit Passes and Bike Sharing Membership on Vehicle Miles Traveled," GreenTRIP Connect, http://connect.greentrip.org/Method.TDMs.beta.pdf, 3.
[118] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 230-1.
[119] CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures," 280.
[120] Southern California Association of Governments and Commuter Transportation Services, Inc., TMA Handbook: A Guide to Forming Transportation Management Associations (Los Angeles: SCAG and Commuter Transportation Services, 1989): 57.

membership.[121] By enabling the pooling of resources among geographically proximate employers and developments, TMOs more efficiently and effectively implement VMT-reducing strategies above and help TMO members reach their maximum VMT reduction potential.

Demonstrated VMT reduction:

- VMT benefits are not yet quantified in substantial literature.

User-defined Strategies

New opportunities to reduce drive alone trips, VMT, and vehicle trips are constantly emerging. The TDM program embraces effective innovation and will adapt over time. In order to receive points for strategies not on this menu, applicants or property owner/tenants must submit evidence that a proposed strategy will meet the program goals. LADOT staff will review proposals, accept or reject them with justification, and assign point values as needed. Enhanced monitoring and reporting may be required for these strategies. If strategies do not demonstrate expected results, staff may require that an applicant replace the strategy. User-defined strategies can also be suggested by TMOs or community members during the development review process. To submit a user-defined strategy for consideration, email ladot.tdm@lacity.org with a description of the proposed TDM strategy along with the proposed evaluation metrics, monitoring and reporting plan. (See **Appendix D**)

Best Practices from Other TDM Programs

For this technical justification, State Smart Transportation Initiative researchers at the University of Wisconsin-Madison consulted materials and/or program staff in 11 localities and two states: Arlington County, Virginia; Bellevue, Washington; Boulder, Colorado; Cambridge, Massachusetts; Honolulu, Hawaii; Madison, Wisconsin; Pasadena, California; Portland, Oregon; San Francisco, California; Santa Monica, California; Seattle, Washington; and the states of Oregon and Washington. Some programmatic best practices and findings include:

- Arlington County Commuter Services, a bureau of Arlington County's Transportation Division in Virginia, operates a Transportation Demand Management for Site Plan Development program, which requires TDM integration in the site design. These include transit access, active transportation infrastructure, and other commuter services. In 2014, the program reduced 41,126 drive alone trips on an average weekday and reduced vehicle miles traveled by 39 percent.[122]
- The City of Cambridge, Massachusetts, operates a TDM Program that imposes mitigation measures based on the number of vehicle parking stalls at a location. Between 2000 and 2010,[123] the city reported a 5.3 percent drop in drive alone trips arriving at workplaces in the city, and a 4.3 percent decrease in drive alone commute trips originating in the city.[124]
- The City of Portland, Oregon Lloyd District is a growing commercial and residential area east of downtown. Over a seven-year period the Lloyd District Transportation Management Association reduced the share of drive alone trips by workers in the area from 60 percent to 41 percent. It achieved this reduction in driving alone by implementing outreach; pricing (previously free) parking; integrating existing transit; improving

[121] Victoria Transport Policy Institute, "Transportation Management Associations," TDM Encyclopedia, Apr. 23 2018, https://www.vtpi.org/tdm/tdm44.htm.
[122] Arlington, "Reduction in SOV Trips."
[123] 2010 data based on 2006-2010 average.
[124] Cook, "2006-2010 Cambridge Journey to Work."

bicycle, pedestrian, and transit infrastructure; and establishing incentives such as reduced-cost transit passes.[125]

Locating a building in a dense area with diverse land uses will generate less drive alone trips than locating the same building in a lower-density, more homogenous area. The City's Mobility Plan 2035, the Transportation Element of the City's General Plan, acknowledges this principle, stating that "Locating uses that better serve the needs of the population closer to where they work and live reduces the number and distance of vehicle trips and decreases the amount of pollution from mobile sources."[126] This principle of location efficiency is central to the City's proposed California Environmental Quality Act (CEQA) revisions, which divides the City into travel behavior zones (TBZs) where greater density and more land use diversity are associated with more transit use and lower auto travel. Even in more location-efficient travel settings, new development can generate traffic, often on streets that are already congested, especially if they build an abundance of off-street parking that is offered at no cost to building occupants and/or visitors, which can negatively impact already congested urban streets. Additionally, people that live in location efficient TBZs may opt to drive if they feel that choosing other ways to get around like biking or transit are unsafe or inconvenient. While location can play an important role in demand management, the City's TDM Program will ensure land use developments implement TDM strategies to address congestion and drive alone trips. The Program offers strategies that can be applied to various different land use and transportation contexts to meet that goal.

[125] Lloyd District Transportation Management Association, "Lloyd District Partnership Plan: A Case Study in Transportation Efficiency," May 5, 2007, http://www.wsdot.wa.gov/NR/rdonlyres/F9571913-97CC-4891-8B0E-8F2685F914AF/0/Lloyd_District_Parking_management.pdf.

[126] Los Angeles Department of City Planning, "Mobility Plan 2035: An Element of the General Plan," Sept. 7, 2016, https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf, 17.

Appendix C: Summary of TDM Strategies

TDM Strategies	TDM Strategy Description	TDM Point Value	Non-Applicable Land Use
AFFORDABLE HOUSING[1]			
Affordable Housing 1: 20% of State Density Bonus	Projects that receive 20% of California's Density Bonus and provide a minimum of: · 10% Low Income; or · 5% Very Low Income.	2 Points	Employment Retail
Affordable Housing 2: TOC Tier 1, 2, 3 or equivalent	Projects that provide the following Affordable Housing percentages or commensurate Tier 1 percentages in the most recent TOC guidelines: · 20% Low Income; · 11% Very Low Income; or · 8% Extremely Low Income.	4 Points	Employment Retail
Affordable Housing 3: TOC Tier 4 or equivalent	Projects that provide the following Affordable Housing percentages or commensurate Tier 4 percentages in the most recent TOC guidelines: · 25% Low Income; · 15% Very Low Income; or · 11% Extremely Low Income.	6 Points	Employment Retail
Affordable Housing 4: 100% Affordable	Projects in which 100% of the housing units (exclusive of any manager's units) are restricted affordable dwelling units.	10 Points	Employment Retail

[1] Projects may be eligible for a maximum of one (1) Affordable Housing Strategy.

Draft Program Guidelines

BICYCLE FACILITIES			
Bicycle Facilities 1: Locate near a Bike Share Station*	Project is located within 600 feet of an existing bike share station - Bike Share Location Map. *LADOT shall pre-approve the selection of this TDM Strategy. May not be combined with Bicycle Facilities 2	2 Points	---
Bicycle Facilities 2: Install Bike Share Station*	Install a publicly accessible bike share station. Must be pre-approved by Metro and may require and agreement. May not be combined with Bicycle Facilities 1	5 Points	---
Bicycle Facilities 3: Bike Share Memberships*	Offer bike share membership passes to employees and/or residents In accordance with available pass options (applicable for locations within 0.25 miles from an existing or planned bike share station - Bike Share Location Map). *LADOT shall pre-approve the selection of this TDM Strategy that the project is within an eligible location.	- 5 Points (See https://bikeshare.metro.net/for-business/)	---
Bicycle Facilities 4: Bicycle Parking	Install and maintain on-site bicycle parking at or above ratios as determined in Sections 12.03, 12.21, and 12.21.1 of the L.A.M.C.	2 Points	---
Bicycle Facilities 5: Changing and Shower Facilities	Provide clothes changing and/or shower facilities for employees or students at or above ratios as determined in Section 91.6307 of the L.A.M.C.	Privately Accessible = 2 Points Publicly Accessible = 4 Points Publicly Accessible and in a Disadvantaged Area = 5 Points	Housing
Bicycle Facilities Bonus	Implementation of three or more Bicycle Facilities strategies for bonus points.	3 Strategies = 1 Point 4 Strategies = 2 Points	---
CAR SHARING			

Car Sharing 1: Car Share Parking	Provide at least one car share space per 25 employees/dwelling units, with a minimum of two car-share parking spaces. Requires cooperation with a car share service provider.	Private = 3 Points Publicly Accessible = 4 Points	School
Car Sharing 2: Car Share Memberships	Offer an annual car share membership, not including trip fees (through a third-party car share service operator) for at least 50% of residents or employees (applicable for locations within 0.25 miles of an existing service area). If the applicant selects BlueLA as the provider, the TDM point total from this measure is 4 points. Eligible projects must be located within 0.25 miles of existing BlueLA vehicle spaces. *LADOT shall pre-approve the BlueLA partnership	3 Points Membership to Blue LA program or in a disadvantaged area = 4 points*	School
Car Sharing 3: Private Car Share Fleet	Provide a car share fleet available to all building occupants. Minimum of 2 cars per project site.	5 Points	School
Car Sharing Bonus	Implementation of two or more Car Share strategies for bonus points.	2 Points	School
Electric Vehicle Bonus	Provide 100% electric vehicle fleet or membership to electric vehicle car share program for a bonus point.	1 Point	School
CHILD CARE			
Child Care 1: On-Site Child Care	On-site child care provided by a licensed childcare provider.	2 Points	Housing
HIGH OCCUPANCY VEHICLES			
High-Occupancy Vehicles 1: Guaranteed Return Trip	Provide at least six taxi or Transportation Network Companies (TNC) fare vouchers or reimbursements for	2 Points	Housing

	at least 50% of employees who travel by non-drive alone trips		
High-Occupancy Vehicles 2: HOV Parking	Provide free, reserved HOV parking spaces (carpool, vanpool, etc.). Should be closer to the building entrance than other non-HOV parking spaces (excluding ADA stalls). Minimum 2 parking spaces.	2 Points	Housing
High-Occupancy Vehicles 3: HOV Program	HOV Program where school administrators, employers, residential property managers, or homeowners associations coordinate a HOV program to match individuals, groups, parents and/or families available to share rides on a regular basis	2 Points	Retail
High-Occupancy Vehicles 4: Mandatory Trip-reduction Program	Deploy an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of travel choices and opportunities to alter their habits. The program typically includes a coordinated ride-sharing, vanpool and/or carpooling program, requires a program coordinator, and includes program monitoring, reporting and evaluation. A minimum of 50% of all employees on site should be eligible for the trip reduction program. May not be combined with Information 3 or 4.	8 Points	Housing
INFORMATION			
Information 1: Transit Displays	Provide real-time transit arrival displays at each major entrance of the project site. Display should capture transit options within 0.25 miles.	Internally visible = 2 Points Publicly visible = 3 points	---
Information 2: Wayfinding	Post wayfinding signage near major entrances directing building users to rail stations, bus stops, bicycle facilities, bicycle parking, car sharing kiosks, and other sustainable	1 Point	---

	(non-drive alone) travel options, provided inside and/or outside of the building.		
Information 3: Education, Marketing, and Outreach	Offer new employees and residents a packet of materials and/or provide personal consultation detailing sustainable (non-SOV) travel options. These materials or consultations must be available on an ongoing basis and/or on permanent online channels. Packet must include the distribution of one Metro TAP card preloaded with a day pass or equivalent value, to each employee or residential unit. May not be combined with High-Occupancy Vehicles 4 or Information 4.	4 Points	---
Information 4: Travel Behavior Change Program	A multi-faceted program involving two-way communication campaigns and travel feedback that actively engages participants to target individual attitudes, goals, and travel behaviors to alter their travel choices and habits. Program must include the distribution of one Metro TAP card preloaded with a day pass or equivalent value, to each employee or residential unit. Selection of this strategy requires a coordinator to manage the program, and ensure communication is available to all regular occupants of a site with a special focus on new occupants and/or employees. Must include participation from 20% of the project site's tenants/users to qualify for this TDM strategy. This strategy pairs well with a TMO. It may not be combined with Information 3 or High-Occupancy Vehicles 4.	6 Points	---
Information 5: School Safety Campaign	The yearlong Safety Campaign targets the school's parents and students to heighten their awareness of the importance of traffic safety. This campaign also integrates TDM strategies to bring awareness to how parents and students can reduce congestion.	4 Points	Employment Retail Housing

Draft Program Guidelines

MIXED-USE			
Mixed-Use 1	Projects that are mixed-use and provide no more than 85% of floor area for a single land use.	5 Points	---
MOBILITY INVESTMENT			
Mobility Investment 1: Access Improvements	Install or make contributions to new or improved facilities in the public right-of-way (PROW) that support greater access to the project by people that bicycle, walk, and take transit. All PROW investment shall be consistent with the Mobility Plan 2035, and may include, but are not limited to, curb extensions, leading pedestrian intervals, controlled mid-block crosswalks, pedestrian refuge islands, protected bicycle lanes, bike boxes, exclusive bicycle signal phases, street trees, etc. LADOT shall be consulted to verify the opportunity and feasibility of access improvements near the project site. The point values are relative to the improvement and location, and shall be determined in coordination with LADOT staff. *LADOT shall pre-approve the selection of this TDM Strategy to confirm availability of a mobility investment solution that meets the needs of people that bicycle, walk, and take transit in the project area and can be addressed by the proposed funding.	4 points for incorporating access to project site from a bicycle or multi-use path 4 points for improvements to 25-49 percent of ¼ mile walkshed or commensurate value 6 points for improvements to 50-74 percent of ¼ mile walkshed or commensurate value 8 points for improvements to 75-99 percent of ¼ mile walkshed or commensurate value 10 points for 100 percent of improvements of ¼ mile walkshed or commensurate value	---
Mobility Investment 2: Mobility Management	Funds capital expansion, operations, and maintenance for existing sustainable mobility programs (Metro Bike Share, carshare, etc.).	2 Points for $50,000-$199,999 4 points for $200,000-$499,999 6 points for $500,000 and above	---

Draft Program Guidelines

PARKING			
Parking 1: Pricing and Unbundling Parking	Pricing of parking encourages sustainable modes of travel (non-drive alone) and can be accomplished in several ways. Property managers and homeowner associations can unbundle the price of parking from rents or sale of units.[2] The parking cost is set by the project applicant and paid by the vehicle owners/drivers. This strategy may not be combined with Parking 2: Parking Cash Out	1 point - the cost of each parking space is at least $25/mo. 4 points - the cost of each parking space is at least $110/mo. 8 Points - the cost of each parking space is at least $220/mo.	Retail
Parking 2: Parking Cash Out	Implement a "cash out" program, where all full or part-time employees who do not use a parking space are paid the value of the space instead in time increments that the parking is leased. The value of a space shall be the leased value, if leased, and shall be the market value of a parking space if owned by the property owner.	4 Points	Housing Retail
Parking 3: Shared Parking	Share parking among different land uses or properties. A notarized agreement among tenants or property owners is required to receive points.	1 - 4 Points (1 point for every 25% of parking stalls available to occupants during effective hours of shared parking)	---
Parking 4: Public Parking	Provide public access to the property's parking. Must be coupled with on-demand parking availability publicized through public signage and/or approved mobile application. This strategy is especially encouraged for properties that provide parking supply at rates above L.A.M.C. or Specific Plan requirements. To earn points for this strategy, a project must provide the number of	4 Points	---

[2] For projects that are using incentives pursuant to the City's density bonus ordinance, the separate sale or rental of a dwelling unit and a parking space shall not cause the rent or purchase price of a Restricted Affordable Unit, including the parking space to be greater than it would otherwise have been.

	parking spaces available for public use. That supply must be, at a minimum, 25% of the total parking supply rounded up to the next whole number.		
Parking 5: Reduced Parking Supply	Reduction in parking supply below the generalized citywide parking baseline (See Glossary), using parking reduction mechanisms, including, but not limited to, TOC, Density Bonus, Bicycle Parking ordinance, locating in an Enterprise Zone or Specific Plan area, or compliance with zoning regulations that require less parking than the generalized citywide parking baseline. Points are also awarded for projects providing a reduced supply of parking as allowed by an approved variance.	2 Points - reduces 10%-24% of the parking spaces available relative to the parking baseline. 4 Points - reduces 25%-49% of the parking spaces available relative to the parking baseline. 8 Points - reduces 50%-89% of the parking spaces available relative to the parking baseline. 12 Points - reduces 90%-100% of the parking spaces available relative to the parking baseline.	---
SHARED MICRO-MOBILITY			
Shared Mobility 1: Service Membership	Partner with a shared micro-mobility company to provide discounted membership fees for building occupants (e.g. residents and employees). Make shared micro-mobility fleet devices accessible for easy identification and use.	1 Point	---
Shared Mobility 2: Local Shared Fleet	Purchase and operate a shared micro-mobility fleet that is available on-site for use or rent for building occupants (e.g. residents and employees). The fleet size shall be determined to ensure a shared device is available 90 percent of the time it is requested.	1 Point	---
TELECOMMUTE			

Telecommute 1: Telecommute	Offer employees a telecommute option for at least 1 day a week, which would allow employees to work from home rather than commute to the office. This telecommute option must be available to at least 50% of employees assigned to the project site.	2 - 6 Points (one additional point for each additional day an employee is allowed to work from home)	Housing, Retail, School
Telecommute 2: Televisits	Offer visitors virtual visitation options including telehealth, virtual meetings, remote learning, and conferencing.	3 Points	Housing, Retail
TRANSIT ACCESS			
Transit Access 1: Neighborhood Shuttles/Microtransit*	Operate a neighborhood-serving transit service (shuttle/ microtransit etc.). *LADOT shall pre-approve the selection of this TDM Strategy to ensure that the neighborhood-serving transit service is complementing and not substituting existing transit services.	Service that connects within the neighborhood but does not connect to high-quality transit stations = 3 Points Along a route that connects to high-quality transit station(s) = 5 points. Publicly available = +3 points Publicly available and in a disadvantaged area = +4 points	---
Transit Access 2: Transit Passes	Provide employees/residential units transit subsidies. Points awarded vary based on the amount of transit subsidy provided per employee or residential unit.	Subsidy per passenger for Metro TAP card monthly fare: 25% of monthly fare = 7 Points; 50% of monthly fare = 10 Points; 75% of monthly fare = 12 Points	---

		100% of monthly fare = 14 Points	
Transit Access 3: Improve Transit Service*	Provide funding to a local transit provider for improvements that improve service quality (reduce headways, etc.) at transit stops within ¼ mile radius of the project site. Funds could also contribute to an existing shuttle or microtransit service (e.g. DASH) in consultation with LADOT if this option is available near the project site. *LADOT shall pre-approve the selection of this TDM Strategy to ensure the availability of qualifying transit service that serves the property.	2 Points for $50,000-$199,999 4 Points for $200,000-$499,999 6 Points for $500,000 and above	---
Electric Transit Vehicle Bonus	Provide 100% electric vehicle or bus for a bonus point.	1 Point	---
TRANSPORTATION MANAGEMENT ORGANIZATIONS			
TMO 1: Join a TMO*	Join an existing TMO. *LADOT shall pre-approve the selection of this TDM Strategy to verify the availability of a qualifying TMO that could serve the property. For a reference of criteria that is considered in pre-qualifying a TMO, see Appendix E: Transportation Management Organization (TMO) Certification Guidelines.	2 Point	---
TMO 2: Create a new TMO*	Create a new TMO in an area where there is not already an existing TMO service. Should a project select to start a new TMO, the project must not be within an existing TMO service area and commit to a two-year membership to be awarded points.	4 Points	---

	*LADOT shall pre-approve the selection of this TDM Strategy to verify the feasibility of establishing a TMO that could serve the property. For a reference of criteria that is considered in pre-qualifying a TMO, see Appendix E: Transportation Management Organization (TMO) Certification Guidelines.		
USER-DEFINED TDM STRATEGIES			
User-defined strategies*	Implement a strategy in coordination with LADOT that is not included in this table. *Consult LADOT before submitting a TDM Plan. User-defined strategies must have approval from LADOT before the TDM Plan is accepted.	Point value may vary.	---

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Appendix D1.1: TDM Plan Compliance Documentation Checklist Form

This form is for property owners or managers who are required to complete TDM Plan Compliance Documentation on an annual basis. Each TDM strategy listed below contains documents required to verify that a property owner or manager is maintaining all required TDM Strategies that are included in the approved TDM Plan.

Affordable Housing

- ☐ HCID Letter/TOC Tier Verification Form/Clearance Form
- ☐ Covenant and Agreement that specifies the number of units reserved for low income households

Bicycle Facilities 1: Locate Near Bike Share Station

- ☐ Map depicting main entrance within 600 feet of Metro Bike Share station (if the Bike Share station location has changed, property owner must contact LADOT to amend the TDM plan)

Bicycle Facilities 2: Install Bike Share Station (requires pre-approval)

- ☐ Photos of installed bike share station (if Bike Share station location has changed, property owner must contact LADOT to amend the TDM plan)

Bicycle Facilities 3: Bike Share Memberships (requires pre-approval)

- ☐ Receipts from bike share provider of total memberships purchased and fare value

Bicycle Facilities 4: Bike Parking

- ☐ Photographs of short-term and long-term bike racks

Bicycle Facilities 5: Changing, Shower, and Locker Facilities

- ☐ Photographs of changing, shower, and locker facilities

Car Sharing 1: Car Share Parking

- ☐ Signed contract with a car share service provider (minimum 1-year length)
- ☐ Photographs of car share parking area

Car Sharing 2: Car Share Memberships

- ☐ Signed contract with a car share service provider (minimum 1-year length)

Car Sharing 3: Private Car Share Fleet

- ☐ Executed contract between property owner(s) and operator, which includes terms of service and expected vehicle availability

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Childcare

- ☐ Signed contract (minimum 1-year term) with a licensed childcare provider

High Occupancy Vehicles 1: Guaranteed Return Trip

- ☐ Number of rideshare/taxi rides given out per month in the reporting period

High Occupancy Vehicles 2: HOV Parking

- ☐ Photographs of parking that is reserved for HOV
- ☐ A diagram that shows the location of spaces designated for HOV parking relative to building entrances.

High Occupancy Vehicles 3: HOV Program

- ☐ Documentation of means the HOV program is promoted to on-site occupants
- ☐ Signed contract with an HOV program provider (minimum 1-year contract) if applicable
- ☐ Number of on-site participants per month in the annual reporting period

High Occupancy Vehicles 4: Mandatory Commute Trip Reduction Program

- ☐ Detailed plan of strategies in the Program
- ☐ Contracts with service providers participating in the Program if applicable
- ☐ A summary of the campaign feedback or aggregated survey responses that includes how many total occupants(s) were engaged, a percent of total occupants engaged, attitudes of TDM, and ways the program shifted to respond to the needs and preferences for non-SOV travel of onsite occupants and visitors (if applicable)

Information 1: Transit Displays

- ☐ Photographs of installed transit displays

Information 2: Wayfinding

- ☐ Photographs of installed wayfinding signs

Information 3: Encouragement Program

- ☐ Pdf copies of advertising materials to be distributed to new residents or employees
- ☐ Receipt of Metro TAP passes that were included in information packets
- ☐ Signed contract(s) with service provider(s) if TDM marketing services are contracted out to a third party (minimum 1-year contract)

Information 4: Travel Behavior Change Program

- ☐ Pdf copies of campaign materials and emails that were distributed to building occupants
- ☐ Receipt of Metro TAP passes that were included in information packets
- ☐ A summary of the campaign feedback or aggregated survey responses that includes how many total occupants(s) were engaged, a percent of total occupants engaged, attitudes of TDM, and ways the campaign shifted to respond to the needs and preferences for non-SOV travel of onsite occupants and visitors (if applicable)

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Information 5: School Safety Campaign

- ☐ Photographs, lesson plans and/or slide decks from safety campaign events

Mixed Use

- ☐ Lease agreements and/or certificate of occupancy of occupied uses and their square footages

Mobility Management 1: Access Improvements

- ☐ Finalized plans of mobility access improvements
- ☐ Photographs of installed Access Improvements, once installed

Mobility Management 2: Mobility Management

- ☐ Documentation of one-time payment to LADOT

Parking 1: Pricing/Unbundling Parking

- ☐ Evidence of compliance with the requirements of parking provision as stated in the lease or deed.
- ☐ Evidence of parking price structure and revenues from the lease or charge for parking spaces.

Parking 2: Parking Cash-Out

- ☐ Documentation of cash value provided to employees that participate in the program
- ☐ Number and percentage of employees making use of the parking cash-out

Parking 3: Shared Parking

- ☐ Provide executed notarized agreement from the LADOT template between properties that assign a number of spaces or portions of the parking facility that is accessible to their respective occupants and visitors including available times that parking is accessible.

Parking 4: Public Parking

- ☐ Covenant agreement that guarantees that at least 25% of parking spaces will be available for general public use.
- ☐ Documentation (e.g. photographs, web application link, or other user-interface portal) that demonstrates how public parking is promoted to the general public.

Shared Micro-Mobility 1: Existing Provider

- ☐ Signed contract (minimum 1-year length) with a micro-mobility service to provide discounted memberships to residents/employees

Shared Micro-Mobility 2: Local Shared Fleet

- ☐ Photographs of shared mobility fleet
- ☐ Annual report of monthly ridership statistics and percentage of time that a device is available on-site.

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Telecommute 1: Telecommute

- ☐ Annual report detailing how many employees make use of telecommuting regularly, how many days are cumulatively taken

Telecommute 2: Televisits

- ☐ Provide documentation, such as a service plan, website, or brochure that verifies that appointment requests can be made by televisit.
- ☐ Annual report detailing how many visitors make use of telecommuting regularly and how many appointments where services were cumulatively accessed

Transit Access 1: Neighborhood Shuttle

- ☐ Map of route with service frequency, schedules, and span
- ☐ Link to public/user facing service platform where users access route information and fare payment (if applicable)
- ☐ Monthly ridership statistics (reported annually)

Transit Access 2: Transit Passes

- ☐ Receipts and/or invoices from the transit agencies that documents the purchase of the TAP cards OR
- ☐ Receipts and/or invoices from the transit agencies that documents loaded value subsidy of the TAP cards

Transit Access 3: Improved Transit

- ☐ Documentation of payment to transit agency

Electric Transit Vehicle Bonus

- ☐ Documentation of electric vehicle(s) planned to be put in use
- ☐ Photographs of electric shuttle being used for shuttle service

TMO 1: Join a TMO

- ☐ Letter of agreement with a TMO indicating that the development's employers will join

TMO 2: Create a TMO

- ☐ Document with covenant agreement language detailing the creation of the new TMO

Residential Weekly Travel Survey

Name			
Apartment #		**Work ZIP Code**	

1. In the table on the following page, record the date of the past five *weekdays* (not counting weekends nor today).
2. Recall the three longest trips, by distance, you took each day. A trip is *any* time you left and returned home, including work, meals, errands, social events, etc. If you took fewer than three trips, leave those columns blank.
3. On the last page, look up the code that best matches how you traveled for each of those trips.
4. Write a code in the "Primary Mode" box for each trip, in each direction.
5. If you traveled by two modes (e.g., biked to a train), write the one that covered more distance in the "Primary Mode" box and lesser distance in the "Secondary Mode" box. Otherwise, leave the "Secondary Mode" box blank.

Residential Weekly Travel Survey

	Weekday #1	Weekday #2	Weekday #3	Weekday #4	Weekday #5
Survey Date					
If you are employed, check this box if you telecommuted, took vacation/sick leave, or otherwise did not go into work that day.					

		Longest Trip		Second-longest Trip		Third-longest Trip	
		Left Home	*Return Home*	*Left Home*	*Return Home*	*Left Home*	*Return Home*
Day #1	*Primary Mode*						
	Secondary Mode						
Day #2	*Primary Mode*						
	Secondary Mode						
Day #3	*Primary Mode*						
	Secondary Mode						
Day #4	*Primary Mode*						
	Secondary Mode						
Day #5	*Primary Mode*						
	Secondary Mode						

Residential Weekly Travel Survey

Codes and Mode of Travel

Driving, Transit, etc.	A	Zero-emission Vehicle	*Drove in a zero-emission vehicle with any number of passengers (Hybrids do NOT count, unless they can reach work on electric power alone.)*
	B	Bus	*Took a bus*
	C	Train	*Rode a train, subway, light rail, etc. (also includes plane)*
	D	Walk	*Walked or traveled by wheelchair, etc.*
	E	Bicycle	*Biked (also includes scooter, skateboard, etc.)*
	E E	Bike Share	*Biked via bike share (also includes scooter share, etc.)*
	H	Driving Alone	*Drove a car with no other people (except for zero-emission vehicles)*
	I	Motorcycle	*Drove a motorcycle*
Carpool, Vanpool, Rideshare	J	2-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with two people in the car*
	K	3-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with three people in the car*
	L	4-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with four people in the car*
	M	5-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with five people in the car*
	N	6-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with six people in the car*
	O	7-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with seven people in the car*
	P	8-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with eight people in the car*
	Q	9-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with nine people in the car*
	R	10-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with ten people in the car*
	S	11-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with eleven people in the car*
	T	12-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with twelve people in the car*
	U	13-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with thirteen people in the car*
	V	14-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with fourteen people in the car*
	W	15-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with fifteen people in the car*

Employee Weekly Commute Survey

Employee Information

Name			
Employee ID #		**Home ZIP Code**	

Instructions

1. On the next page, look up the code that best matches how you traveled to and from work each day.
2. Write a code in the "Primary Mode" box for each day, for both morning and evening commutes.
3. Do not leave any "Primary Mode" box blank. There are codes for days off and other non-travel situations.
4. If you traveled by two modes (e.g., biked to a train), write the one that covered more distance in the "Primary Mode" box and lesser distance in the "Secondary Mode" box. Otherwise, leave the "Secondary Mode" box blank.

Morning Commute (6 A.M. to 10 A.M.)

In the boxes below, write the code indicating how you traveled to or from work.
If you arrived or departed outside of this time period, use the code CC.

	Monday	Tuesday	Wednesday	Thursday	Friday
Primary Mode How you traveled most or all of the way					
Secondary Mode Leave blank if none					

Evening Commute (3 P.M. to 7 P.M.)

In the boxes below, write the code indicating how you traveled to or from work.
If you arrived or departed outside of this time period, use the code CC.

	Monday	Tuesday	Wednesday	Thursday	Friday
Primary Mode How you traveled most or all of the way					
Secondary Mode Leave blank if none					

Codes for the boxes above can be found on the following page.

Employee Weekly Commute Survey

Codes and Mode of Travel

Driving, Transit, Remote Work, etc.	A	Zero-emission Vehicle	*Drove in a zero-emission vehicle with any number of passengers (Hybrids do NOT count, unless they can reach work on electric power alone.)*
	B	Bus	*Took a bus*
	C	Train	*Rode a train, subway, light rail, etc. (also includes plane)*
	D	Walk	*Walked or traveled by wheelchair, etc.*
	E	Bicycle	*Biked (also includes scooter, skateboard, etc.)*
	EE	Bike Share	*Biked via bike share (also includes scooter share, etc.)*
	F	Telecommute	*Worked from home or from a satellite location*
	G	Non-commute	*Took an out-of-town business trip or slept at the workplace*
	H	Driving Alone	*Drove a car with no other people (except for zero-emission vehicles)*
	I	Motorcycle	*Drove a motorcycle*
Carpools/ Vanpools/ Rideshare	J	2-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with two people in the car*
	K	3-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with three people in the car*
	L	4-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with four people in the car*
	M	5-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with five people in the car*
	N	6-person Carpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with six people in the car*
	O	7-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with seven people in the car*
	P	8-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with eight people in the car*
	Q	9-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with nine people in the car*
	R	10-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with ten people in the car*
	S	11-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with eleven people in the car*
	T	12-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with twelve people in the car*
	U	13-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with thirteen people in the car*
	V	14-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with fourteen people in the car*
	W	15-person Vanpool/Rideshare	*Took a carpool, vanpool, Uber, Lyft, taxi, etc. with fifteen people in the car*
Compressed Work Schedule	X	Day Off during 3/36 Work Week	*Took a day off as part of a regular compressed schedule of three 12-hour workdays every week*
	Y	Day Off during 4/40 Work Week	*Took a day off as part of a regular compressed schedule of four 10-hour workdays every week*
	Z	Day Off during 9/80 Work Week	*Took a day off as part of a regular compressed schedule of nine 9-hour workdays every two weeks*
Other Days	AA	Vacation	*Took a vacation day and did not work at all that day*
	BB	Sick	*Took sick leave and did not work at all that day*

Employee Weekly Commute Survey

Off	**CC**	**Travel outside of Commute Window or Other**	*Includes travel outside of the morning (6 A.M. to 10 A.M.) or evening (3 P.M. to 7 P.M.) commute periods, days off that are not part of compressed schedule, jury duty, military service, bereavement, maternity leave, medical/disability leave, leaves of absence, etc.*

Parking Hour Utilization

Land Use Code		**Transit**	
Name of Site		**Area**	
Description of Site		**TMP**	
		Parking Price	

Location

Site Size		**Units**		**Occupancy**		**Land Use**
Site Size		**Units**		**Occupancy**		
Site Size		**Units**		**Occupancy**		
Site Size		**Units**		**Occupancy**		

Number of parking spaces provided at site

Highest observed parking demand the following hours of the day (hour beginning)

Date							
Day							
12 MID							
1:00 AM							
2:00 AM							
3:00 AM							
4:00 AM							
5:00 AM							
6:00 AM							
7:00 AM							
8:00 AM							
9:00 AM							
10:00 AM							
11:00 AM							
12:00 NON							
1:00 PM							
2:00 PM							
3:00 PM							
4:00 PM							
5:00 PM							
6:00 PM							
7:00 PM							
8:00 PM							
9:00 PM							
10:00 PM							
11:00 PM							

Name		
Contact Information		

Appendix E: Transportation Management Organization (TMO) Certification Guidelines

Process

Employers and Developers may rely on the services of a Transportation Management Organization (TMO) to implement their TDM Plans. TMO membership consists of organizations and businesses who remit annual dues for access to trip reduction services at amounts set forth by the TMO.

Requirements

The City may recognize TMOs that submit the following documentation to the City of Los Angeles Department of Transportation (LADOT) for review and approval to obtain certification:

- The list of current Board members and the time, frequency, and location of Board meetings.
- A mission statement that describes the reasons for the organization's existence and the fundamental goals of the TMO. The mission statement must support the goals of the City's Mobility Plan 2035, Sustainable City pLAn, and the LADOT Strategic Plan
- A list of goals and objectives focusing on supporting the mission statement. Specific activities, services, and tasks shall be listed to show how the members will be served by the TMO and how the TMO will help meet the area and regional transportation and air quality goals.
- A list of services to be provided by the TMO to its members, including the multimodal transportation infrastructure and services to be provided and promoted, the advocacy and marketing activities planned including in-person, on-site outreach to employees, TMO staff roles providing the services offered.
- A first year plan including the following components:
    - A marketing plan that presents a brand and identity for the TMO as well as describes how the TMO's planned services will be marketed to member employers and/or developers and their tenants and/or employees.
    - A data collection and evaluation strategy or plan to analyze baseline data gathered via survey to the TMO membership on existing travel characteristics and attitudes of commuters towards traffic and the use of multimodal transportation infrastructure and services. The annual survey shall survey each employer and/or resident's mobility choices and attitudes toward the existing services and developing new programs.
    - A monitoring and evaluation plan which utilizes data gathered in the annual survey to measure progress against the TMO mission statement, goals and objectives, including results of the TMO's activities within the service area provided to the membership. This plan will include the annual report information required by the City.
- An annual budget including expenditures and also discloses public and private financing.

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- A signed agreement committing the TMO submit an annual report to the City for TMO certification. The annual report shall include the same elements as the first year plan with the following exceptions:
    - The mission statement shall be revised based on changes in the goals and objectives of the TMO, if any.
    - The goals and objectives shall be updated to reflect progress and any changes in the TMO services.
    - The baseline survey need not be repeated, however, the annual report shall include any follow-up survey efforts and evaluation activities to measure against the baseline survey. Follow-up surveys are encouraged to ensure the TMO is engaged with its membership and understands its needs.
    - Follow-up survey evaluation and results can be used to promote next year's planned activities and receive feedback about services.

Performance Measures

The City recognizes TMOs that demonstrate their effectiveness in providing public benefits generated by their services. The City requires TMOs to demonstrate their effectiveness by reporting on performance measures of their choosing in their annual report. Effectiveness can be measured using a variety of performance measures, which include but are not limited to the examples described below. :

Performance Measure Type	*Purpose*	*Example*
Activities	Measures the level of effort and engagement by the organization with quantitative data on activities. Refers to actions or activities promoting or advancing the TMO's mission and goals.	• Number of stakeholder outreach events held • Number of stakeholders attended outreach events • Number of marketing presentations delivered • Number of brochures distributed (i.e. by mail, in hand) • Number of calls made by membership services to enroll members • Number of innovative partnerships to promote new technologies or incentive programs (i.e. Metro Micro, Waze Carpool, etc.) • Number of awards/recognition programs for members (i.e. annual

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		Employee Transportation Coordinator awards)
Impressions	Demonstrates the response to activities or outcomes initiated by the TMO. Refers to actions the client or customer took to demonstrate interest in organization.	• Total number of active paying member companies and/or property developments • Number of calls for information received • Number of membership applications received • Number of people reached (website or social media site visits, advertising views) • Average time users spent on website or social media sites • Number of individual mobile trip planning application downloads • Average time users spent on mobile application • Number of individual newsletter subscriptions • Rate or change in enrollment following the marketing activities
Results/Direct Effects	Measures the effects of combining the organization's input activities and impressions on individuals. Data is gathered by the organization to demonstrate the benefits of its services to members, regulatory agencies, and other stakeholders.	• Number of employees, residents and visitors served • Average Vehicle Ridership (AVR) across all properties served • Number of single occupant vehicle (SOV) trips reduced • Number of SOV trips shifted to other modes • Number of new transit riders • Vehicle miles traveled (VMT) reduced (i.e. per person, per site, per service area) • Change in parking use/occupancy • Greenhouse gasses reduced

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		• Calories burned
Cost Effectiveness	Assesses the relationship between a dollar amount invested in each activity and/or impression to demonstrate the return on investment of an activity or strategy.	• Cost per SOV trip reduced • Cost per individual shared ride coordination • Cost per employer membership secured • Cost per VMT reduced • Cost per new carpool or vanpool • Gas, parking, driving costs saved

EXHIBIT C:
Screenshots and Link to Beta TDM Calculator

CPC-2021-3141-CA, ENV-2013-0911-EIR-ADD3

For consideration by the City Planning Commission

September 22, 2022

Link to Beta TDM Calculator:

https://tdm.ladot.lacity.org/

LACP | LADOT

TDM

LADOT Create Project About Public Comment Login

0 PROJECT LEVEL

0 EARNED

0 TARGET

Welcome to Los Angeles' Transportation Demand Management (TDM) Calculator

First, let's get some information about your project

Project Name * Example Project

Address *

AIN/APN (Assessor's Identification Number) *

Alternative #

Building Permit #

LADOT Case #

City Planning Case #

Project Description

* designates required fields

Page 1/5

LACP | LADOT

TDM

LADOT Create Project About Public Comment Login

2 PROJECT LEVEL

0 EARNED

20 TARGET

Determine Project Level

Project Level (left panel) and Citywide Parking Baseline (next page) are determined by the use specifications entered below.

Reset Project Reset Page

Residential - Multifamily		
Condominium Units		dwelling units
Non-Condominium Units with less than 3 habitable rooms	87	dwelling units
Non-Condominium Units with 3 habitable rooms		dwelling units
Non-Condominium Units with more than 3 habitable rooms		dwelling units
Do all the residential units qualify as 100% Affordable Housing?	☐	
Hotel / Motel		
Number of Guest Rooms		rooms
Retail		
Retail		sq ft
Retail Furniture		sq ft
Restaurant, Bar, General		sq ft
Health Club		sq ft
Take-out Restaurant		sq ft
Employment / Office		
Office, Business		sq ft
Government Institution		sq ft
Other Institutional		sq ft
Warehousing / Industrial		

LACP | LADOT

TDM

LADOT Create Project About Public Comment Login

2
PROJECT LEVEL

0
EARNED
20
TARGET

Calculate Project TDM Target Points

Target Points (left panel) may be adjusted based on parking spaces entered below.

Parking Provided

90 spaces

Your project level	2
Your target points	20
Citywide Parking Baseline	87 spaces
Parking Provided / Baseline	103.45 %

Page 3/5

LACP | LADOT

TDM

LADOT Create Project About Public Comment Login

2
PROJECT LEVEL

20
EARNED
20
TARGET

TDM STRATEGIES SELECTED	EARNED POINTS
Affordable Housing Level	2 pts
Bike Share Station	2 pts
Bike Parking (Required on all new developments)	2 pts
Transit Displays	2 pts
Encouragement Program	4 pts
Pricing/Unbundling	8 pts

Select TDM Strategies

Select TDM strategies to earn earn points to reach the Target (left panel).

Reset Project Reset Page

Affordable Housing		Possible	Earned
Affordable Housing Level	20% of State Density Bonus	2-10 pts	2 pts
Bicycle Facilities		**Possible**	**Earned**
Bike Share Station	Locate near a Bike Share Sta	2-5 pts	2 pts
Bike Share Memberships	☐	5 pts	
Bike Parking (Required on all new developments)	☑	2 pts	2 pts
Changing / Shower / Locker Facilities	N/A	2-5 pts	
Bike Bonus		1-2 pts	
Car Sharing		**Possible**	**Earned**
Car Share Parking	N/A	3-4 pts	
Car Share Memberships	N/A	3-4 pts	
Private Car Share Fleet	☐	5 pts	
Electric Vehicle Bonus	☐	1 pts	
Car Share Bonus		2 pts	
Child Care		**Possible**	**Earned**
Child Care		2 pts	
High Occupancy Vehicles		**Possible**	**Earned**
Guaranteed Return Trip		2 pts	
HOV Parking		2 pts	

EXHIBIT D:
Environmental Clearance: 3rd Addendum to the Mobility Plan EIR, SCH No. 2013041012, dated September 9, 2022

CPC-2021-3141-CA, ENV-2013-0911-EIR-ADD3

For consideration by the City Planning Commission

September 22, 2022

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
200 North Spring St., Room 750
Los Angeles, CA 90012

ADDENDUM

Transportation Demand Management Program Update

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

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

Project Location: Citywide

Community Plan Area: All

Council District: All

PREPARED BY:
The City of Los Angeles
Department of City Planning

September 9, 2022

TABLE OF CONTENTS

INTRODUCTION **4**

1.1 Introduction/Purpose of Addendum 4

1.2 CEQA Requirements 5

1.3 Mitigation Requirements 6

1.4 Summary Comparison of Significant Impacts Identified in Mobility Plan 2035 Final EIR compared to Impacts of the Project 6

1.5 Incorporation by Reference 14

1.6 Summary of Effects 14

DESCRIPTION **16**

2.1 Mobility Plan 2035 and Mobility Plan 2035 Final EIR 16

2.2 Project Background 18

2.3 Project Objectives 20

2.4 Characteristics of the Project 20

2.5 Discretionary Actions and Approvals 22

ENVIRONMENTAL SETTING AND IMPACT ANALYSIS **23**

3.1 Overview 23

3.2 Effects Determined to be Less Than Significant Based on EIR Categories 24

3.3 Air Quality 27

3.4 Biological Resources 34

3.5 Greenhouse Gas Emissions 40

3.6 Land Use and Planning 43

3.7 Noise & Vibration 50

3.8 Transportation, Parking and Safety 59

LIST OF TABLES

1 Summary of Impacts Determined in Mobility Plan 2035 FEIR Compared to Impacts of the Project ... 8

2 Treatment Level and Construction Consistency …….. 23

3 Maximum Noise Levels of Common Construction Machines …… 44

4 Vibration Velocities for Construction Equipment ……. 47

INTRODUCTION

1.1 Introduction/Purpose of Addendum

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

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

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

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

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

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

1.2 CEQA Requirements

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

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

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

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

    A. *The projects will have one or more significant effects not discussed in the previous EIR or negative declaration;*

    B. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

    C. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

    D. *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

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

a) *The lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:*

    1) *Any of the conditions described in Section 15162 would require preparation of a subsequent EIR, and*

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

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

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

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

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

1.3 Mitigation Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.5 Incorporation by Reference

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

City of Los Angeles Mobility Plan 2035 Draft Environmental Impact Report

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

City of Los Angeles Mobility Plan 2035 Final Environmental Impact Report

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

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

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

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

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

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

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

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

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

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

1.6 Summary of Effects

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

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

DESCRIPTION

2.1 Mobility Plan 2035 and Mobility Plan 2035 Final EIR

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

updates users with new information.

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

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

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

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

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

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

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

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

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

2.2 Project Background

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

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

[2] Los Angeles Times. "Los Angeles County hosts a record 50 million visitors in 2018." January 16, 2019.
[3] Population estimate from one-year ACS data for 2010-15; employment estimate from California Employment Development Department 2011-6.
[4] Commuting Characteristics by Sex, 2013-2017 American Community Survey, 5-Year Estimates, Los Angeles City

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

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

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

Project Need

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

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

Alignment with State of California Policies

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

- The South Coast Air Quality Management District (South Coast AQMD) Rule 2202 (adopted in 1995 with subsequent amendments) requires employers with worksites of 250 or more employees to manage single occupancy vehicle commute trip demand.

- California's Complete Streets Law, Assembly Bill 1358 (2008), declares it is state policy "to shift from short trips in the automobile to bicycling, walking and use of public transit."

- Similarly, the current strategic management plan of the California Department of Transportation calls for tripling bicycle mode share and doubling pedestrian and transit mode shares, compared with 2010-12 baselines, and for reducing statewide VMT.

- California Senate Bill 743 (2013), requires local jurisdictions to prioritize the safety and access of all street users by revising transportation impact assessment methodology for

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

2.3 Project Objectives

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

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

2.4 Characteristics of the Project

The Project will update the following ordinances:

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

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

2. An ordinance amending LAMC 19.15, Department of Transportation Traffic Study Review, Condition Clearance and Permit Issuance Fees (transportation related development review fees), to update LADOT development review fees to account for the different review procedures and responsibilities necessary on the part of LADOT staff in accordance with the proposed changes to the transportation impact study review process. The amendment would add fees for the review of TDM Plans, TDM Plan Compliance Documentation, and any necessary Monitoring Reports, and adjust the balance of the development review fees to reflect increased program costs (e.g. labor rates and technology procurement) and changes to work flows since the City adopted VMT as a review metric.

3. An ordinance amending Article 26 of Chapter 5 of Division 5 of the Los Angeles Administrative Code (LAAC) to administer a “Mobility Investment Trust Fund,” which would replace the existing “Bicycle Plan Trust Fund” and “Neighborhood Traffic Management Fund.” The Mobility Investment Trust Fund would be used to fund mobility investments through collection of voluntary contributions from projects that select either of the “Mobility Investment” TDM strategies in their TDM Plan that is reviewed and approved by LADOT. Mobility investments are defined as investments in sustainable transportation infrastructure and mobility services that are found to be consistent with the Mobility Plan 2035 and would support other ways of getting around besides driving alone.

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

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

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

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

the Final EIR), or any other impact category.

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

2.5 Discretionary Actions and Approvals

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

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

ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

3.1 Overview

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

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

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

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

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

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

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

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

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

Aesthetics

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

Agriculture and Forestry Resources

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

Cultural Resources

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

Geology and Soils

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

Hazards and Hazardous Materials

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

Hydrology and Water Quality

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

Mineral Resources

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

Population and Housing

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

Public Services

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

Recreation

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

Utilities and Service Systems

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

Mandatory Findings of Significance

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

3.3 Air Quality

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

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

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

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

Construction

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

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

Operation

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

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

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

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

2.1.1 Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as on employer and encourage the private sector to do the same to reduce work trips and traffic congestion.

2.2.1 Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.

4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

4.2.5 Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

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

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

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

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

<u>Construction</u>

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

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

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

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

Operation

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

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

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

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

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

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

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

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

Construction

Because the Basin is designated as a State and/or federal nonattainment air basin for O_3, $PM_{2.5}$, PM_{10} and Pb, there is an ongoing regional cumulative impact associated with these pollutants. An individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. A significant impact would occur if the project resulted in cumulative net increase in any criteria pollutant above thresholds identified by the SCAQMD. The SCAQMD's approach for assessing cumulative air quality impacts is based on the SCAQMD forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. The SCAQMD has set forth significance thresholds designed to assist in the attainment of ambient air quality standards. The SCAQMD has indicated that the project-level thresholds may be used as an indicator defining if project emissions contribute to the cumulative impact. As discussed above, construction emissions would not exceed the SCAQMD significance thresholds. Therefore, the Project would result in less-than-significant impact related to cumulatively considerable construction impact.

Operation

As previously discussed, the Project would decrease mobile source emissions within the City compared to Existing conditions. Traffic volumes are expected to be lower as a result of the multi-modal sustainable transportation options required to be implemented by applicable projects; in addition to the expectation of lowered pollutant emissions from mobile sources due to technological advances in vehicle emissions systems combined with normal turnover in the vehicle fleet and new emission standards. There is no potential for project-related emissions to contribute to the Basin's cumulative impact for O_3, $PM_{2.5}$, PM_{10} or Pb. Further, it is anticipated that the Project will reduce VMT and associated mobile source emissions, thereby contributing towards the regional goal of eliminating the cumulative impact. Therefore, the Project would result in a less-than-significant impact related to a cumulatively considerable operational impact. For the Project, no new impacts would occur and no mitigation measures are required.

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

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

Construction

The MP 2035 EIR evaluated localized impacts from on-site daily emissions associated with construction activities for sensitive receptors located adjacent to construction activity based on LST guidance published by the SCAQMD.[5] LSTs are only applicable to NO_{X2}, CO, PM_{10} and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. On-site emissions typically include equipment exhaust and fugitive dust emissions. Daily construction emissions related to the MP 2035 would not exceed SCAQMD localized significance thresholds (NO_X -74 pounds per day, CO – 426 pounds per day, $PM_{2.5}$ – 3 pounds per day, PM_{10}- 4 pounds per day).

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

Operation

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

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

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

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

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

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

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

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

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

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

Construction

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

Operation

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

3.4 Biological Resources

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

(a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife Services (USFWS)?

(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?

(c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filing, hydrological interruption, or other means?

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

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

Construction

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

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

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

Operation

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

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

- MP 2035 Mitigation Measures

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

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

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

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

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

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

➢ Significance of Impact after Mitigation

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

- Implementation of Mitigation Measure BR2 would ensure that for mobility improvements that extend into the Ballona wetlands, that the wetlands would be altered in the least disrupted way possible and replacement wetlands are incorporated to reduce potentially significant impacts related to wetlands to less-than-significant. However, due to the unknown nature of future projects and mitigation measures, the MP 2035 FEIR found a potentially significant impact remains. The TDM Project would not change conditions or introduce additional impacts related to biological resources.

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

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

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

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

Construction

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

Operation

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

- MP 2035 Mitigation Measures

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

- Significance of Impact after Mitigation

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

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

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

Construction and Operation

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

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

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

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

Construction and Operation

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

3.5 Greenhouse Gas Emissions

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

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

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

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

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

<u>Construction & Operation</u>

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

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

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

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

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

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

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

Construction & Operation

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

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

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

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

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

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

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

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

3.6 Land Use and Planning

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

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

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

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

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

Construction

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

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

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

Operation

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

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

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

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

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

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

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

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

➢ MP 2035 Mitigation Measures

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

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

➢ Significance of Impact after Mitigation

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

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

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

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

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

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

Construction

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

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

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

Operation

Regional and State Plans and Policies.

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

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

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

City of Los Angeles Plans and Policies.

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

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

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

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

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

- Adequate accessibility to work opportunities and essential services, and acceptable levels of mobility for all those who live, work, travel, or move goods in Los Angeles.

- A Street system maintained in a good to excellent condition adequate to facilitate the movement of those reliant on the system.

- An integrated system of pedestrian priority street segments, bikeways, and scenic highways.

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

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

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

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

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

- A diverse system of streets that balances the needs of pedestrians, bicyclists, transit users, equestrians, mobility challenged persons, and vehicles while providing sufficient mobility and abundant access options for the existing and future users of the street system.

- A system of safe, efficient, and attractive pedestrian, bicycle, and trail routes linking neighborhoods to key areas in the community, including commercial centers, services and employment, points of historical interest, as well as open space and recreational areas.

- A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.

- Develop a public transit system that improves mobility with convenient alternatives to automobile travel.

- A well maintained, safe, and efficient street network.

- To increase the work trips and non-work trips made on public transit.

- To promote an adequate system of safe bikeways for commuter, school and recreational use.

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

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

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

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

➢ MP 2035 Mitigation Measures

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

➢ Significance of Impact after Mitigation

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

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

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

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

3.7 Noise & Vibration

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

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

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

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

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

<u>Construction</u>

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

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

TABLE 3 : MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES			
Noise Source	**Noise Level (dBA)**		
	50 Feet [a]	**100 Feet [a]**	**400 Feet [a]**
Front Loaders	80	74	62
Trucks	89	83	71
Jackhammers	90	84	72
Concrete Mixers	82	76	64
Pavers	87	81	69

a. Assumes a 6-dBA drop-off rate for noise generated by a "point source" and traveling over hard surfaces. Actual measured noise levels of the equipment listed in this table were taken at distances of 10 and 30 feet from the noise source.
SOURCE: City of Los Angeles, *City of Los Angeles CEQA Thresholds Guide*, 2006.

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

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

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

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

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

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

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

Operation

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

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

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

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

- MP 2035 Mitigation Measures

Construction

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

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

Operation

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

➢ Significance of Impact after Mitigation

Construction

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

Operation

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

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

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

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

Construction

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

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

TABLE 4 : VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT

Equipment	PPV at 15 feet (Inches/Second) /a/	PPV at 25 feet (Inches/Second) /a/	PPV at 50 feet (Inches/Second) /a/	PPV at 100 feet (Inches/Second) /a/
Small Bulldozer	0.003	0.003	0.0001	0.0004
Large Bulldozer	0.191	0.089	0.031	0.011

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

Operation

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

➢ MP 2035 Mitigation Measures

Construction

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

Operation

None required.

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

➢ Significance of Impact after Mitigation

Construction

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

Operation

Vibration impacts related to operations would be less than significant.

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

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

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

Construction

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

Operation

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

➢ MP 2035 Mitigation Measures

No mitigation measures are applicable.

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[9] *Ibid*

➢ Significance of Impact after Mitigation

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

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

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

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

Construction

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

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

Operation

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

➢ MP 2035 Mitigation Measures

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

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

➢ Significance of Impact after Mitigation

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

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

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

(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

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

<u>Construction and Operation</u>

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

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

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

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

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

3.8 Transportation, Parking and Safety

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

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

(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

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

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

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

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

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

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

- MP 2035 Mitigation Measures

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

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

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

- Significance of Impact after Mitigation

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

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

(b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

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

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

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

- MP 2035 Mitigation Measures

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

- Significance of Impact after Mitigation

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

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

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

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

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

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

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

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

(d) Result in inadequate emergency access?

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

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

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

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

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

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

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

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

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

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

- MP 2035 Mitigation Measure

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

- Significance of Impact after Mitigation

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

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

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

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

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

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

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

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

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

[12] Mobility Plan 2035, p. 13.
[13] Ibid, p. 109.

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

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

(f) Result in inadequate parking capacity?

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

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

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

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

[14] Mobility Plan 2035, p. 13.

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

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

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

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

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

EXHIBIT E:
Council Motion on TDM
(Council File 15-0719-S19, motion adopted May 9, 2018)

CPC-2021-3141-CA, ENV-2013-0911-EIR-ADD3

For consideration by the City Planning Commission

September 22, 2022

MOTION

Traffic congestion plagues Los Angeles and its neighborhoods, demanding a range of varied and smart solutions. In a rapidly transforming transportation landscape, new and more modern strategies are needed to provide residents a wider menu of transportation options, allowing them to recapture the hours stolen by gridlock.

Over the past 25 years, traffic and transportation in Los Angeles have changed dramatically. New employment centers and new housing trends have shifted, confused, and extended commutes. Twice in the past decade, voters have invested in sales tax increases to fund construction and expansion of mass transit. Lyft, Uber, car share, and bike share are transforming transportation. The coming dawn of autonomous vehicles promises to revolutionize it.

Yet Los Angeles' plans and programs to reduce gridlock by reducing vehicles miles traveled have not fundamentally changed since it adopted a Transportation Demand Management ordinance in 1993. As the City implements its progressive transportation policy through Mobility Plan 2035, as the State of California mandates transportation and planning policies that focus on reducing emissions, and as new technology and transportation infrastructure emerge, it is the appropriate time to update our TDM ordinance.

Transportation Demand Management (or Mobility Management) refers to various strategies that change travel behavior in order to improve efficiency, ease traffic, and reduce carbon footprints. It includes a large menu of options including ridesharing, carpooling, vanpooling, shuttles, telecommuting, flexible work hours, bicycle parking, subsidized transit passes, and much, much more. The TDM program at UCLA has reduced trips to that campus by 25% in just the past decade -- even as the population of the campus and its facilities increased. In 2015, UCLA's drive-alone rate was close to 54% for employees, significantly lower than Los Angeles County as a whole, where approximately 73% of all commuters drive alone to work according to 2014 U.S. Census data. The drive-alone rate for UCLA's commuting students is even lower at just over 26%.

Transportation Demand Management can provide similar results and benefits when applied to developments and employment centers. Through partnerships with employers and developers, the City can ensure that employees and residents are provided with convenient alternatives to a personal vehicle. Currently, some developers and large employers are required to implement TDM measures, however the existing TDM requirements in Section 12.26 J. of the Los Angeles Municipal Code (LAMC) need to be updated and incorporated more systematically across projects of all sizes.

The City should update its ordinance to offer a user-friendly menu of TDM strategies that promote equitable, multimodal access to destinations and can be adapted as transportation technologies and services continue to evolve. A recent action by the Metro Board of Directors positions Metro as an emerging leader in offering TDM programs and pass programs targeted at employers and institutions. Therefore, the opportunity exists to jointly develop a new citywide TDM Ordinance in parallel with the

development of new mobility services and payment options.

In addition, General Plan policies and sections of the LAMC need to be reviewed, and amended where needed to align with the complete streets policies of Mobility Plan 2035, specifically where the City directs public right-of-way investments to support multimodal streetscape improvements.

I THEREFORE MOVE that the City Attorney, working with the Department of City Planning and the Department of Transportation, to prepare and present an ordinance that updates the City's Transportation Demand Management (TDM) requirements and amends municipal code sections related to TDM, including shared and off-site parking and related fee schedules, as needed to implement TDM measures;

I FURTHER MOVE that the City Attorney, working with the Department of City Planning and the Department of Transportation, to prepare and present an ordinance that amends, as necessary, applicable Los Angeles Municipal Code sections related to project review to ensure consistency with Mobility Plan 2035.

I FURTHER MOVE to direct the Personnel Department, Department of City Planning, and Department of Transportation to report on TDM best practices that could be implemented for City employees.

PRESENTED BY:

MIKE BONIN
Councilmember, 11th District

JOSE HUIZAR
Councilmember, 14th District

SECONDED BY:

ORIGINAL

CPC-2021-3141-CA

HOLLY L. WOLCOTT
CITY CLERK

SHANNON D. HOPPES
EXECUTIVE OFFICER

When making inquiries relative to this matter, please refer to the Council File No.: 15-0719-S19

City of Los Angeles
CALIFORNIA

ERIC GARCETTI
MAYOR

Exhibit E - 3

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
ACTING DIVISION MANAGER

CLERK.LACITY.ORG

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

May 11, 2018

Council File No.: 15-0719-S19

Council Meeting Date: May 09, 2018

Agenda Item No.: 13

Agenda Description: TRANSPORTATION COMMITTEE REPORT relative to updating and implementing the City's Transportation Demand Management (TDM) measures and integrating TDM with the Mobility Plan 2035.

Council Action: TRANSPORTATION COMMITTEE REPORT - ADOPTED

Council Vote:

YES	BOB BLUMENFIELD
YES	MIKE BONIN
YES	JOE BUSCAINO
ABSENT	GILBERT A. CEDILLO
YES	MITCHELL ENGLANDER
YES	MARQUEECE HARRIS-DAWSON
ABSENT	JOSE HUIZAR
ABSENT	PAUL KORETZ
ABSENT	PAUL KREKORIAN
YES	NURY MARTINEZ
YES	MITCH O'FARRELL
YES	CURREN D. PRICE
ABSENT	MONICA RODRIGUEZ
YES	DAVID RYU
YES	HERB WESSON

HOLLY L. WOLCOTT
CITY CLERK

File No. 15-0719-S19

TRANSPORTATION COMMITTEE REPORT relative to updating and implementing the City's Transportation Demand Management (TDM) measures and integrating TDM with the Mobility Plan 2035.

Recommendations for Council action, pursuant to Motion (Bonin - Huizar - Koretz):

1. REQUEST the City Attorney, in conjunction with the Department of City Planning and the Los Angeles Department of Transportation (LADOT), to prepare and present an ordinance:

    a. Updating the City's TDM requirements and amending Los Angeles Municipal Code (LAMC) sections related to TDM, including shared and off-site parking and related fee schedules, as needed to implement TDM measures.

    b. Amending, as necessary, applicable LAMC sections related to project review to ensure consistency with Mobility Plan 2035.

2. DIRECT the Personnel Department, Department of City Planning and the LADOT to report relative to TDM best practices that could be implemented for City employees.

Fiscal Impact Statement: Neither the City Administrative Officer nor the Chief Legislative Analyst has completed a financial analysis of this report.

Community Impact Statement: None submitted.

(Planning and Land Use Management Committee waived consideration of the above matter)

SUMMARY

On February 23, 2018, Council considered Motion (Bonin - Huizar - Koretz) relative to updating and implementing the City's TDM measures and integrating TDM with the Mobility Plan 2035. Motion states that TDM refers to various strategies that change travel behavior in order to improve efficiency, ease traffic, and reduce carbon footprints. It includes a menu of options for employers and institutions, including ridesharing, carpooling, vanpooling, shuttles, telecommuting, flexible work hours, bicycle parking, subsidized transit passes, and more.

To respond to the City's Mobility Plan 2035, new emission reduction mandates, and new technology and transportation infrastructure, Motion movers believe the time has come to update the City's TDM Ordinance which was adopted in 1993. Motion movers further believe that the TDM Ordinance update should offer a user-friendly menu of TDM strategies that promote equitable, multimodal access to destinations and can be adapted as transportation technologies and services continue to evolve. It is also believed that General Plan policies and sections of the LAMC be reviewed and amended to align with the complete streets policies of Mobility Plan 2035, specifically where the City directs public right-of-way investments to support multimodal streetscape improvements.

Ordinance to update the TDM accordingly. Motion also recommends that Council instruct the Personnel Department, Department of City Planning and the LADOT to report relative to TDM best practices that could be implemented for City employees. Council referred Motion to the Information, Technology, and General Services Committee and the Planning and Land Use Management Committee for consideration.

At its meeting held February 28, 2018, the Transportation Committee discussed this matter with representatives of LADOT and the City Planning Department. Department staff stated the goals of the TDM Ordinance are to improve air quality and reduce harmful emissions by encouraging alternatives to single-driver commuting. Staff is conducting public outreach and seeking input from the business community and from Neighborhood Councils. The Committee Chair suggested that staff devise an outline for the completion and implementation of a new TDM Ordinance with anticipated milestone dates. It was also suggested that staff include representatives of the Departments of Aging and Disability in the TDM Working Group, and that community outreach include other advocacy organizations such as AARP. Committee recommended that Council approve Motion's recommendations.

Respectfully Submitted,

TRANSPORTATION COMMITTEE

MEMBER	VOTE
BONIN:	YES
MARTINEZ:	YES
KORETZ:	YES

JAW

-NOT OFFICIAL UNTIL COUNCIL ACTS-