

## 5. Environmental Analysis

### 5.17 TRANSPORTATION AND TRAFFIC

This section of the program EIR evaluates the potential for implementation of the SUP to impact transportation facilities and traffic within the District. This section discusses plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards), along with the existing major transportation facilities throughout the SUP area, and possible environmental impacts that may occur during future phases of the SUP and site-specific projects implemented under the SUP. This section also identifies significance thresholds that will be applied during site-specific review and possible mitigation measures that may be employed to avoid or reduce significant impacts.

#### Terminology

**Level of Service.** Traffic operations of roadway facilities are described as “Level of Service” (LOS). LOS is a qualitative description of traffic flow based on such factors as speed, travel time, delay, and freedom to maneuver. Six levels are defined—from LOS “A”, representing completely free-flow conditions, to LOS “F”, representing breakdown in flow resulting in stop-and-go conditions. LOS “E” represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. Table 5.17-1 summarizes the volume/capacity (V/C) ranges for LOS “A” through “F”. The V/C ranges are designated in the Los Angeles County Congestion Management Program (CMP) as well as the General Plans for the City of Los Angeles and County of Los Angeles for signalized intersections.

**Table 5.17-1 Volume/Capacity and Corresponding Level of Service**

LOS	Interpretation	Volume to Capacity Ratio
A	There are no streets that are fully loaded, and few are close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	0.00 – 0.60
B	Represents stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted within platoons of vehicles.	0.61 – 0.70
C	Stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasional drivers may have to wait through more than one red signal intersection, and backups may develop behind turning vehicles.	0.71 – 0.80
D	Encompasses a zone of increasing restriction approaching instability. Delays to approaching vehicles may be substantial during short peaks with the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.	0.81 – 0.90
E	Represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00), there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).	0.90 – 1.00
F	Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable because full utilization of the approach may be prevented by outside conditions.	>1.00

Source: Transportation Research Board. Highway Capacity Manual, 2000.

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### 5.17.1 Environmental Setting

#### 5.17.1.1 REGULATORY FRAMEWORK

State and local laws, regulations, plans, and guidelines, along with LAUSD Standards are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to transportation and traffic in the District. Site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

#### State

##### *Government Code Sections 65040.2 and 65302*

Assembly Bill 1358, the **Complete Streets Act** (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists. At the same time, the California Department of Transportation (Caltrans) unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

#### Local

##### *County and City General Plans*

The LAUSD is not subject to municipal regulations, such as the county and city general plans. Nevertheless, the District has considered local plans and policies for the communities surrounding its facilities. The boundaries of the LAUSD encompass most of the County of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles. For the purpose of this analysis, the City of Los Angeles and the County of Los Angeles traffic regulations are described. If an LAUSD project would affect transportation facilities at any other municipality, consideration would be given to the standards and level of service standards of that municipality.

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### Regulatory Agencies

#### *County of Los Angeles*

V/C ranges for LOS “A” through “F” are designated in the Los Angeles County CMP as well as the general plans for the City of Los Angeles and County of Los Angeles for signalized intersections. The Intersection Capacity Utilization (ICU) methodology is the preferred method to calculate the existing and future level of service at intersection, per the Los Angeles County guidelines.<sup>1</sup> According to the county, a project would cause an increase in traffic on a highway that is substantial in relation to the existing traffic load and capacity of the street system if the project would:

- Increase the V/C ratio or ICU by at least one percentage point (0.01) at any location where the final V/C ratio or ICU is 0.91 or greater (LOS E or F).
- Increase the V/C ratio or ICU by at least two percentage points (0.02) at any location where the final V/C ratio or ICU is between 0.81 and 0.90 (LOS D).
- Increase the V/C ratio or ICU by at least four percentage points (0.04) at any location where the final V/C ratio or ICU is between 0.71 and 0.80 (LOS C).

#### *Los Angeles County Metropolitan Transportation Authority*

Los Angeles County Metropolitan Transportation Authority (Metro) serves as transportation planner and coordinator, designer, builder, and operator for Los Angeles County. Metro funds improvements to all modes of transportation through several programs, including the Transportation Improvement Program (TIP), the CMP, and Bicycle Transportation Strategic Plan. Metro operates rail and bus transit services throughout Los Angeles County.

#### *Los Angeles County Congestion Management Program*

The CMP has been implemented locally by Metro. The CMP involves monitoring traffic conditions and performance measures on the designated transportation network, analyzing the impact of land use decisions on the transportation network, and implementing mitigation measures to reduce impacts on the network. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways compose the CMP system. New projects within the County of Los Angeles must comply with the CMP, which was adopted by the Metro pursuant to state law.<sup>2</sup>

Based on the CMP criteria, the following locations must be analyzed:

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<sup>1</sup> County of Los Angeles Department of Public Works, County of Los Angeles Traffic Impact Analysis Report Guidelines (1997), p. 5 and 6.

<sup>2</sup> Los Angeles County Metropolitan Transportation Authority. Congestion Management Program for Los Angeles County. 2010. [http://www.metro.net/projects/congestion\\_mgmt\\_pgm/](http://www.metro.net/projects/congestion_mgmt_pgm/)

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- Mainline freeway monitoring locations where a project will add 150 or more trips, in either direction, during either AM or PM weekday peak hours.
- All CMP arterial monitoring intersections, including freeway on- and off-ramp intersections, where a proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).

Appendix D of the CMP includes Transportation Impact Assessment (TIA) guidelines. It requires a TIA for any project that impacts CMP highways and intersections. If a project does not add, but merely shifts trips at a given monitoring location, a CMP analysis is not required.

A significant impact occurs when a project increases traffic demand on a CMP facility by 2 percent of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when a project increases traffic demand on a CMP facility by 2 percent of capacity ( $V/C \geq 0.02$ ).

#### *City of Los Angeles*

The Los Angeles Department of Transportation (LADOT) sets long-term goals for the city's transportation needs. LADOT is the main agency responsible for the planning, design, construction, and operations of transportation systems in the City of Los Angeles. The LADOT works in conjunction with the city's planning department to set long-term policies related to the city's future transportation needs. The City of Los Angeles General Plan contains definitions, goals and objectives, and regulatory requirements for a variety of roadway classifications that make up the city's roadway system. LADOT has established specific thresholds for project-related increases in the V/C of study intersections, shown in Table 5.17-2. It should be noted that the City of Los Angeles does not have threshold criteria for stop-controlled intersections. Significant impacts at the unsignalized intersections are generally defined by changes in LOS to D or worse due to project-related traffic, plus the results of peak-hour signal warrant analyses.

**Table 5.17-2 LADOT Intersection Significance Thresholds**

Level of Service	Final V/C Ratio	Project-Related Increase In V/C
C	> 0.701–0.800	equal to or greater than 0.040
D	> 0.801–0.900	equal to or greater than 0.020
E	> 0.901–1.000	equal to or greater than 0.010
F	Greater than 1.000	equal to or greater than 0.010

Source: City of Los Angeles, Department of Transportation. *Traffic Study Policies & Procedures*, June 2013.  
[http://ladot.lacity.org/stellent/groups/departments/@ladot\\_contributor/documents/contributor\\_web\\_content/lacityp\\_026875.pdf](http://ladot.lacity.org/stellent/groups/departments/@ladot_contributor/documents/contributor_web_content/lacityp_026875.pdf)

#### LAUSD Standards

This table lists transportation and traffic related standard conditions and project design features (PDF) that are included as part of each SUP-related project, as appropriate.

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
<b>Standard Conditions</b>				
T-00 Compliance	Analysis for traffic	If project includes increase in student capacity and additional traffic.	Prior to project approval	<p><b>OEHS CEQA Specification Manual. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.</b></p> <p>Requirements identifies performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"> <li>• Site Selection</li> <li>• Bus and Passenger Loading Areas</li> <li>• Vehicle Access</li> <li>• Pedestrian Routes to School</li> </ul> <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
T-00 Compliance	Vehicular access and parking	If project includes construction of parking, and/or vehicular or pedestrian access.	During project design	<p><b>LAUSD School Design Guide.</b></p> <p>Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> <li>• Parking Space Requirements</li> <li>• General Parking Guidelines</li> <li>• Vehicular Access and Pedestrian Safety</li> <li>• Parking Structure Security</li> </ul>
<b>Project Design Features</b>				
T-1	Analysis for traffic	If project increases student capacity and/or generates additional traffic or shifts traffic patterns.	Prior to project approval	<p>Coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> <li>• Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project.</li> <li>• Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds.</li> <li>• Implementation of SRTS, traffic control and pedestrian safety devices.</li> <li>• Fair share contribution and/or other mitigation measures for potential traffic impacts.</li> <li>• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.</li> <li>• Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction.</li> <li>• Loading zones will be analyzed to determine the adequacy as pick-up and dropoff points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.</li> </ul>
T-2	Construction Traffic	If project requires construction equipment	Prior to construction	<p>LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties LAUSD shall</p>

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
		to use public roadways.		encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.
AQ-6	Traffic reduction	If project includes increase in student capacity and additional traffic.	During school operation	LAUSD shall encourage ride-sharing programs for students and teachers.

The most widely recognized source to estimate the amount of trips generated by a land use or project is the Institute of Transportation Engineer's (ITE) *Trip Generation* manual. The ITE manual is a compilation of results from surveys performed at several land use types across the United States. The rates are based on empirical data, which has led to the conclusion that the number of trips generated by school faculty, students, and visitors is based on the number of student seats. The use of this methodology allows total school-related trips to be defined (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility. LAUSD currently uses the latest version of the ITE manual.

#### 5.17.1.2 EXISTING CONDITIONS

The boundaries of the LAUSD spread over 720 square miles and include the City of Los Angeles as well as all or parts of 31 smaller municipalities and several unincorporated sections of Los Angeles County. The largest portions of LAUSD fall within the City of Los Angeles and the County of Los Angeles jurisdictions. The area within the LAUSD boundaries is served by a circulation system that facilitates travel by multiple modes, walking, bicycling, public transit, and motor vehicles.

#### Roadway Network

This circulation system includes an extensive network of freeways, highways, and local streets. Regional access is provided by Interstates 5, 10, 105, 110, 210, 405, and 101. The area has several state highways—1, 2, 47, 60, 90, 91, 103, 110, 118, 134, 170, and 187. The area within LAUSD boundaries has several thousand miles of public streets that accommodate a variety of motorized vehicles, including transit vehicles. Most of LAUSD is in the City of Los Angeles. Most roadways are aligned on a grid system providing multiple route options for traveling throughout the area.

#### Public Transit

The study area is served by multiple transit operators, with networks connecting different communities within and outside of the LAUSD boundaries. The primary transit operator in Los Angeles County is Metro, which provides bus, light rail, and heavy rail (subway) services throughout the county. In addition, LADOT operates local and commuter bus routes, which mainly connect the City of Los Angeles downtown area and the

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remaining parts of the city. There are also several regional rail and municipal bus operators that provide regional transit services between the City of Los Angeles and municipalities in the outer region.

Metro has two heavy rail lines (i.e., Red and Purple) that operate in a dedicated subway. Metro's four light rail lines (i.e., Blue, Green, Gold, and Expo) use light rail trains that run along rights-of-way, ranging from complete grade separation to at-grade operation in mixed-flow traffic. Metro operates several types of bus service, including the Metro Liner service that operates either in an exclusive right-of-way or along High Occupancy Vehicle (HOV) lanes, and bus routes in mixed traffic on its Rapid, Express, Limited Stop, Local, and Shuttle services. These bus services vary considerably in speed, frequency, and capacity.

There are several other transit operators that provide transit services within LAUSD boundaries. These transit operators include Santa Monica Municipal Bus Lines (Big Blue Bus); Culver City Transit; Orange County Transportation Authority (OCTA); Riverside Transit Agency; OmniTrans, which serves the San Bernardino Valley; Santa Clarita Transit; Gardena Transit; Torrance Transit; and Montebello Bus Lines.<sup>3</sup>

In addition, commuter rail services in the area are provided by Metrolink and Amtrak. Metrolink covers six counties in Southern California with seven lines. Amtrak also serves communities along the coast in Southern California. Passengers on Metrolink and Amtrak are served by stations in the San Fernando Valley and in downtown Los Angeles at Union Station, from which connecting services are provided by Metro or LADOT.

### Bicycle and Pedestrian Facilities

Pedestrians and bicyclists are also important users of the local roadway network. The existing bicycle network is a series of interconnected streets and pathways on which bicycling is encouraged. Pursuant to the California Vehicle Code, bicycles are allowed on any street in the local street system. Designations of Non-Motorized Streets include Class I, Class II, and Class III Bikeways, and Commuter Bikeways.

The majority of the LAUSD area is heavily developed, but development patterns and streetscape conditions vary considerably. Parts of Downtown Los Angeles, Koreatown, Hollywood, and Westwood Village, for example, have a variety of pedestrian-oriented uses fronting the sidewalk. Some residential portions of the San Fernando Valley have narrower street widths and less-connected residential streets than other parts of the City of Los Angeles, while other areas of the Valley are characterized by long blocks fronted by surface parking lots. Still other parts of the City are characterized by industrial land uses offering little in the way of pedestrian amenities.<sup>4</sup>

### School Travel Modes

According to a school survey conducted by the Safe Routes to School National Partnership, compared to the State of California and the nation as a whole, children in Los Angeles County were much more likely to walk to school, likely because the county is urbanized and more children live within walking distance.<sup>5</sup> In Los

<sup>3</sup> Obtained from the City of Los Angeles MP 2035 Draft EIR.

<sup>4</sup> According to the City of Los Angeles MP 2035 Draft EIR.

<sup>5</sup> Safe Routes to School National Partnership. Safe Routes to School in California. Travel in Los Angeles County per 2009 National Household Travel Survey. September 24, 2012. [http://saferoutescalifornia.org/2012/09/24/19percent\\_lac/](http://saferoutescalifornia.org/2012/09/24/19percent_lac/). This is an Analysis Brief

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Angeles County there are about 1.5 million children aged 5 to 15 and 79 school districts; LAUSD is by far the largest. Over half of these children usually traveled to school in a private vehicle and almost one-third usually walked to school. In Los Angeles County 7.7 percent of school children usually rode in a school bus (in LAUSD this percentage is much lower because busing is only provided for Special Needs students<sup>6</sup>), 3.8 percent used some kind of transit, 1.1 percent reported riding a bike, and another 4 percent did not report how they usually traveled to school or were home schooled (see Table 5.17-3). Although not part of the study, high school students age 16 to 18 are anticipated to have approximately the same travel modes, with possibly more transit riders and private vehicles.

**Table 5.17-3 Travel Modes by Students Aged 5 to 15**

Usual Mode of Travel to School	National	Statewide	LA County
Private Vehicle	43.6%	53.7%	51.0%
School Bus	37.1%	13.1%	7.7%
Walk	10.7%	24.3%	32.3%
Any Transit <sup>a</sup>	2.1%	2.7%	3.8%
Bike	1.0%	2.0%	1.1%
Travel Mode not Reported <sup>b</sup>	5.5%	4.2%	4.0%

Source: <http://saferoutescalfornia.files.wordpress.com/2012/09/travel-to-school-in-la-county1.pdf>.

Note: sample sizes: 372 reported private vehicle, 139 reported walk, 37 reported school bus, 16 reported transit, and only 5 children in the LA County sample reported biking to school.

<sup>a</sup> Any Transit<sup>a</sup> includes public and private buses, subway, Metrolink and Amtrak, shuttle bus, and dial-a-ride.

<sup>b</sup> Includes home schooled and don't know/refused.

Over 30 percent of school children in Los Angeles County live within 1/2 mile of school (19.4 percent less than 1/4 mile and another 10.7 percent between 1/4 and 1/2 mile), compared to 16.6 percent for the nation as a whole and 27.6 percent for the state—both of which include rural areas where children often live far from school. For more detailed discussion on pedestrian and bicycle modes, please refer to Chapter 5.12, *Pedestrian Safety*.

### 5.17.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if it would:

- T-1 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

summarized from Travel to School in California. Findings from the California - National Household Travel Survey.

<http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf>

<sup>6</sup> Additionally, even at the height of LAUSD busing (2002–2004) when overcrowding required busing students to schools that had seats, only 1.1 percent of students rode the bus (source: Program Environment Impact Report Traffic Impact Study, Meyer, Mohades and Associates, Inc. January 2004). Since then LAUSD has constructed 130 new schools, and busing has been eliminated at all but one school.



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- 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.
- T-2 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.
- T-3 Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- T-4 Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-5 Result in inadequate emergency access.
- T-6 Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

### 5.17.3 Environmental Impacts

Impacts to pedestrian and bicycle paths are analyzed in Chapter 5.13, *Pedestrian Safety*. The SUP is a program-level action, which must necessarily be evaluated differently than a site-specific project. At this time it is only possible to make generalized estimates of the types of projects that would be implemented under the SUP. The specific location and intensity of the projects throughout the LAUSD is unknown. Therefore, a broader standard for measuring impacts is appropriate for this long-range, program-level impact analysis.

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.17-1: SUP-related trip generation has the potential to impact levels of service on the existing area roadway system. [Threshold T-1]**

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#### All SUP Projects

The SUP has the potential to result in increased traffic in the vicinity of school sites. School construction and modernization have the potential to increase traffic or cause a redistribution of traffic if a project increases capacity, changes access locations, or includes a new or expanded stadium or public-use building.

A variety of projects would have the potential to affect the levels of service at transportation facilities—a change in student capacity associated with classroom loading or grade structure, reconfiguration of the school or construction of new classrooms, installation of portable classrooms, or construction of other school facilities that have the potential to generate additional vehicular trips, such as: Performance arts centers

- New or expanded school stadiums or gymnasiums
- Major administrative centers

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- Health clinic, parent and family center, or other community uses on existing campus
- Aquatic center or complex

SUP-related project traffic is distributed based on driveway locations and the availability of local roads to access the regional roadway system. For example, a new or relocated school access driveway or drop-off or pickup area could shift traffic to a different street or change vehicle turning movements at key intersections in a way that would adversely affect traffic operations.

Finally, a modification in the time of the day when a school facility generates transportation demand could affect traffic levels of service. For example, without an increase in student capacity, a change in pick-up or drop-off schedule during a new stadium event, closer to the PM peak traffic hour (4:00 PM to 6:00 PM), could add traffic to already congested roadways.

These types of projects could result in changes to the level of service on roadway segments and at intersections. There are no specific projects at this time; however, as specific projects are proposed, a detailed traffic and pedestrian safety assessment would be prepared as part of the environmental review to address potential impacts. The SUP does not include the construction of new stand-alone schools; therefore, a significant increase in traffic is not anticipated.

LAUSD would provide safe and appropriate loading and access areas, in compliance with OEHS CEQA Specification Manual and LAUSD School Design Guide.<sup>7,8</sup> As part of each project that increases student capacity and/or generates additional traffic or shifts traffic patterns, LAUSD considers site-specific traffic impacts employing the applicable traffic impact study guidelines from the local jurisdiction. As part of LAUSD PDF T-1, the local jurisdiction traffic department would determine the scope and methodology used in the traffic and pedestrian safety study.

This PEIR provides a program-level analysis for the SUP; no site-specific projects have been identified. In compliance with LAUSD Standards, site-specific traffic analysis would include measures to reduce significant traffic impacts. Such measures may include, but are not limited to, fair-share funding and/or installation of traffic signals, intersection and roadway widening and restriping, turn restrictions, and removal of on-street parking.

Even after compliance with local regulations and procedures to evaluate traffic and mitigate impacts, it cannot be guaranteed that feasible measures would be available to mitigate all SUP-related project traffic impacts that could occur. Specifically, trip generation associated with a new stadium or new school construction on an existing campus. These types of project have the potential to impact levels of service on existing roads. Therefore, traffic impacts are considered potentially significant, and may not be feasibly mitigated to a level of insignificance.

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<sup>7</sup> LAUSD OEHS CEQA Specification Manual. December 2005, Revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.

<sup>8</sup> School Design Guide. Los Angeles Unified School District. January 2014.

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**Impact 5.17-2: SUP-related trip generation may result in designated road and/or highways exceeding county congestion management agency standards. [Threshold T-2]**

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The Los Angeles County CMP requires that when an environmental impact report is prepared for a project, traffic and transit impact analysis be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities.<sup>9</sup> The CMP facilities are major regional access routes such as freeways and arterial roadways. The CMP guidelines require that the first issue to be addressed is the determination of the geographic scope of the study area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

- If the proposed project adds 50 or more trips on streets adjacent to the CMP intersection during AM or PM peak hours.
- If the proposed project adds 150 or more trips on the freeway, in either direction, during either the AM or PM peak hours.

If a project meets the study area criteria, then the Los Angeles County CMP impact threshold is a project-related traffic increase of 2 percent of capacity ( $V/C \geq 0.02$ ) AND an existing or project-related future LOS F ( $V/C > 1.00$ ).

#### All SUP Projects

Even after compliance with local regulations and incorporation of applicable procedures to evaluate potential traffic impacts, it cannot be guaranteed that feasible mitigation would be available to reduce site-specific project-related CMP impacts to less than significant. Trip generation from some SUP-related projects, such as a new charter school or football stadium, may have the potential to impact levels of service for the CMP roadway system. Therefore, CMP roadway impacts are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

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**Impact 5.17-3: SUP-related trip generation would not impact the existing regional transit system and non-motorized travel system. [Thresholds T-1 and T-6]**

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#### All SUP Projects

##### *Regional Transit System*

Appendix D.8.4 of the CMP<sup>10</sup> provides methodology for estimating the number of transit trips expected to result from a project based on the projected number of vehicle trips. This methodology assumes an average vehicle ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project and then provides guidance regarding the percentage of person trips assigned to public transit depending on

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<sup>9</sup> 2010 Congestion Management Program, Los Angeles County Metropolitan Transportation Authority, adopted October 28, 2010. [http://www.metro.net/projects/congestion\\_mgmt\\_pgm/](http://www.metro.net/projects/congestion_mgmt_pgm/)

<sup>10</sup> Los Angeles County Metropolitan Transportation Authority. Congestion Management Program for Los Angeles County. 2010. [http://www.metro.net/projects/congestion\\_mgmt\\_pgm/](http://www.metro.net/projects/congestion_mgmt_pgm/).

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the type of use (commercial/other versus residential) and the proximity to transit services. As shown on Table 5.17-3, the use of public transportation is mostly related to high schools. It is anticipated that the stronger demand occurs in the AM peak hour, as in general school activities end before the PM peak hours. Because a relatively small fraction of students utilize transit, it is not anticipated that SUP-related new construction projects would generate a significant number of riders or cause a substantial impact on the transit system. Impacts would be less than significant.

#### *Nonmotorized Facilities*

The LAUSD is located mostly on a mature network of pedestrian facilities. In the vicinity of schools, pedestrian safety features are usually present, including sidewalks, crosswalks, signage, and crossing guards. Prior to development of school facilities, the LAUSD implements Caltrans' "Safe Routes to School," where specific measures based on the particular conditions for each site are identified to ensure separation between vehicles and pedestrians thru designated pedestrian routes and bike paths. Pedestrian routes are implemented via designation of sidewalks, crosswalks, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian measures. LAUSD encourages ride-sharing programs for students and teachers. Also, students that travel to school may walk or ride bikes; therefore, the SUP would not conflict with policies, plans, or programs for nonmotorized transportation modes. Implementation of the SUP would not result in a significant impact to pedestrian and bicycle systems.

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**Impact 5.17-4: SUP-related circulation improvements would not create potentially hazardous conditions (sharp curves, etc.), incompatible uses, or inadequate emergency access. [Thresholds T-4 and T-5]**

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#### All SUP Projects

As individual projects are proposed and implemented, design development would include the use of standard engineering practices such as standard driveway widths and turning radii and, provision of adequate line of sight to avoid design elements that could result in hazards. "Sight Distance Standards" from the Caltrans Highway Design Manual relate minimum sight distance values to a range of design speeds.<sup>11</sup> Vehicular access and parking shall comply with Section 2.3, Vehicular access and parking, of the School Design Guide. In addition, projects are required to accommodate ingress and egress of emergency vehicles, as required by the affected jurisdiction where the individual project would be implemented. All access features are subject to and must satisfy the fire department at the affected jurisdiction.

LAUSD coordinates with LADOT while selecting locations and has specifications for provision of adequate access, parking, and circulation in the vicinity of a school site.<sup>12</sup> These specifications require that the District:

- Locate schools on secondary highways or collector streets, not on major highways.

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<sup>11</sup> Highway Design Manual, California Transportation Department, May 7, 2012.

<sup>12</sup> LAUSD OEHS CEQA Specification Manual. December 2005, revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.

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- Locate entrances to the school buildings or grounds as close as possible to a pedestrian route to school, or on a minor street near an intersection, or at an existing signalized crosswalk.
- Provide adequate loading areas close to school entry points, and eliminate the need for double-parking
- Provide adequate space for school bus loading and unloading with curb cuts.
- Provide street dedications and improvements, including required traffic control signals, along school site frontage in accordance with state and city standards.
- Prepare a preliminary “Pedestrian Routes to School” map to be completed for the ¼-mile radius or the proposed school’s attendance area, whichever is less.
- Inventory the pedestrian system (including existing sidewalks, crosswalks, and other pedestrian elements) within ¼ mile of a proposed school site and identify necessary safe routes for providing access to and from school.
- Identify potential safety concerns for pedestrian access.
- LADOT will engineer pedestrian route maps identifying controlled intersections and recommended pedestrian routes.
- LAUSD shall coordinate with LADOT the installation of traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.

In addition, as stated previously, projects are required to accommodate ingress and egress of emergency vehicles. All access features are subject to and must satisfy the fire department at the affected jurisdiction. New construction and modernization projects would conform to local ordinances to ensure that adequate emergency access is provided. Impacts would be less than significant.

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**Impact 5.17-5: SUP-related projects would not result in a change in air traffic patterns or change in location that would result in substantial safety risks. [Threshold T-3]**

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### New Construction on New Property or Existing Campus

SUP-related construction and modernization projects may occur within the vicinity of an existing airport, including LAX, Van Nuys Airport, Whiteman Airport, Bob Hope Airport, or Santa Monica Airport. There are only a few schools located within the flight path of an airport (specifically, LAX, Van Nuys, and Bob Hope Airports (see Figure 5.12-1, *Airport Noise*). About 15 out of 1,309 existing schools are within the geographic area of an ALUP; therefore very few new construction projects would occur under the flight path of an airport. Per Education Code Section 17215, the District must receive approval from the CDE and Caltrans, or DOT before acquiring title to property for a school site if the proposed site is within two nautical miles of an airport runway. As part of the SUP, property may be acquired directly adjacent to existing schools

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to accommodate new buildings. The consideration of a proposed site in relation to airports is part of the District's CCR Title 5 and CEQA site review procedures.

According to CDE regulations,<sup>13</sup> the responsibilities of the school district, the California Department of Education, and the Caltrans, Aeronautics Program, Office of Airports, concerning the school site's proximity to runways are contained in *Education Code* Section 17215.<sup>14,15</sup> As a part of the site selection prescreening process, the school district should determine the proximity of the site to runways. If the site is within two nautical miles of an existing airport runway or a potential runway included in an airport master plan, as measured by direct air line from the part of the runway that is nearest to a proposed school site, the following procedures must be followed before the site can be approved:

1. The governing board of the school district, including any district governed by a city board of education, shall give the Department written notice of the proposed acquisition and shall submit any information that is required by the Department. The Department will notify the DOT Aeronautics Program, Office of Airports.
2. The Division of Aeronautics shall investigate the proposed site and, within 30 working days after receipt of the notice, shall submit to the local governing board a written report and its recommendations concerning acquisition of the site. As a part of the investigation, the Aeronautics Program shall give notice to the owner and operator of the airport, who shall be granted the opportunity to comment on the proposed school site.
3. The governing board of the school district shall not acquire title to the property until the report of the DOT Aeronautics Program has been received. If the report favors the acquisition of the property for a school site or an addition to a present school site, the governing board shall hold a public hearing on the matter before acquiring the site.
4. If the report does not favor the acquisition of the property for a school site or an addition to a present school site, the governing board may not acquire title to the property. If the report does not favor acquisition of a proposed site, no state funds or local funds shall be apportioned or expended for the acquisition of that site, construction of any school building on that site, or the expansion of any existing site to include that site.
5. The requirements noted above do not apply to sites acquired before January 1, 1966, or to any additions or extensions to those sites.

By following these procedures and state regulations, the LAUSD would not acquire title of a property that would conflict with findings of the DOT Aeronautics Program, which includes regulations that ensure safety. Therefore, impacts associated with airport safety would be less than significant.

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<sup>13</sup> School Site Selection and Approval Guide. <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp#Noise>

<sup>14</sup> CCR, Title 5, Section 14011(k)

<sup>15</sup> As amended by Assembly Bill (AB) 747, Chapter 837, Statutes of 1999.

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### 5.17.4 Applicable Regulations and Standard Conditions

#### State

- Education Code Section 17215: notification and review by California Department of Transportation, Aeronautics Program, Office of Airports
- American with Disabilities Act (ADA)
- AB 1358, Complete Streets Act
- California Vehicle Code (CVC)

#### Local

- Los Angeles County Metropolitan Transportation Authority Congestion Management Plan
- Jurisdictional municipal codes, vehicular and traffic regulations
- Jurisdictional general plan circulation element or related policies

#### LAUSD Standards

- LAUSD OEHS CEQA Specification Manual. December 2005, Revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.
- School Design Guide. Los Angeles Unified School District. January 2014.
- Project Design Features: PDF T-1, PDF T-2 and PDF AQ-6

### 5.17.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standards listed above, the following impacts would be less than significant: 5.17-3, 5.17-4, 5.17-5, and 5.17-6.

Even with implementation of regulatory requirements and LAUSD Standards the following impacts would be **potentially significant**:

- **Impact 5.17-1** The SUP-related projects may generate vehicular traffic that impact levels of service for the roadway system.
- **Impact 5.17-2** The SUP-related projects may impact levels of service at CMP facilities.

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### 5.17.6 Mitigation Measures

#### Impact 5.17-1

No additional mitigation measures would ensure that traffic impacts would be reduced to less than significant.

#### Impact 5.17-2

No additional mitigation measures would ensure that Los Angeles County Congestion Management Program impacts would be reduced to less than significant.

### 5.17.7 Level of Significance After Mitigation

#### Impact 5.17-1

Traffic impacts may occur for some projects associated with the SUP. Implementation of the OEHS CEQA Specification Manual, School Design Guide, and PDFs T-1 and AQ-6 would encourage ride sharing to reduce reliance on private auto trips, require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices, and provide adequate site access. Possible mitigation measures to offset vehicular impacts to the roadway system could include installation of traffic signals, intersection and roadway widening and restriping, turn restrictions, and removal of on-street parking. However, it may be infeasible to implement mitigation measures to reduce potential impacts from future projects to the roadway system. No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.17-1 would remain significant and unavoidable.

#### Impact 5.17-2

Traffic impacts may occur for some projects associated with the SUP. Implementation of OEHS CEQA Specification Manual, School Design Guide, and PDFs T-1 and AQ-6 would encourage ride sharing to reduce reliance on private auto trips, require specific analysis methods to evaluate traffic impacts and implement adequate traffic control devices, and provide adequate site access. Possible mitigation measures to offset vehicular impacts to the CMP system could include intersection and roadway widening and restriping and turn restrictions. However, it may be infeasible to implement mitigation measures to reduce potential impacts to the CMP from future projects system. No additional mitigation measures are available to reduce impacts. Therefore, Impact 5.17-2 would remain significant and unavoidable.