



Attachment D: Plan, Policy, and Program Consistency Worksheet

Plans, Policies and Programs Consistency Worksheet

The worksheet provides a structured approach to evaluate the threshold T-1 question below, that asks whether a project conflicts with a program, plan, ordinance or policy addressing the circulation system. The intention of the worksheet is to streamline the project review by highlighting the most relevant plans, policies and programs when assessing potential impacts to the City's circulation system.

Threshold T-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

This worksheet does not include an exhaustive list of City policies, and does not include community plans, specific plans, or any area-specific regulatory overlays. The Department of City Planning project planner will need to be consulted to determine if the project would obstruct the City from carrying out a policy or program in a community plan, specific plan, streetscape plan, or regulatory overlay that was adopted to support multimodal transportation options or public safety. LADOT staff should be consulted if a project would lead to a conflict with a mobility investment in the Public Right of Way (PROW) that is currently undergoing planning, design, or delivery. This worksheet must be completed for all projects that meet the Section I. Screening Criteria. For description of the relevant planning documents, **see Attachment D.1.**

For any response to the following questions that checks the box in **bold text** (i.e. **Yes** or **No**), further analysis is needed to demonstrate that the project does not conflict with a plan, policy, or program.

I. SCREENING CRITERIA FOR POLICY ANALYSIS

If the answer is 'yes' to any of the following questions, further analysis will be required:

Does the project require a discretionary action that requires the decision maker to find that the project would substantially conform to the purpose, intent and provisions of the General Plan?

Yes No

Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

Yes No

Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

Yes No

II. PLAN CONSISTENCY ANALYSIS

A. Mobility Plan 2035 PROW Classification Standards for Dedications and Improvements

These questions address potential conflict with:



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Mobility Plan 2035 Policy 2.1 – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.

Mobility Plan 2035 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.

Mobility Plan 2035 Policy 3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

Mobility Plan 2035 Street Designations and Standard Roadway Dimensions

A.1 Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone? Yes No

A.2 If **A.1 is yes**, is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designation. Yes No N/A

A.3 If **A.2 is yes**, is the project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II, or III)? Yes No N/A

If the answer is to **A.1 or A.2 is NO, or to A.1, A.2 and A.3. is YES**, then the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.

A.4 If the answer to **A.3. is NO**, is the project applicant asking to waive from the dedication standards? Yes No N/A

Lists any streets subject to dedications or voluntary dedications and include existing roadway and sidewalk widths, required roadway and sidewalk widths, and proposed roadway and sidewalk width or waivers.

Frontage 1 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

Frontage 2 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

Frontage 3 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

Frontage 4 Existing PROW'/Curb' : Existing _____ Required _____ Proposed _____

If the answer to **A.4 is NO**, the project is inconsistent with Mobility Plan 2035 street designations and must file for a waiver of street dedication and improvement.

If the answer to **A.4 is YES**, additional analysis is necessary to determine if the dedication and/or improvements are necessary to meet the City's mobility needs for the next 20 years. The following factors may contribute to determine if the dedication or improvement is necessary:

Is the project site along any of the following networks identified in the City's Mobility Plan?



- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network

To see the location of the above networks, see **Transportation Assessment Support Map**.¹

Is the project within the service area of Metro Bike Share, or is there demonstrated demand for micro-mobility services?

If the project dedications and improvements asking to be waived are necessary to meet the City's mobility needs, the project may be found to conflict with a plan that is adopted to protect the environment.

B. Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes

B.1 Project-Initiated Changes to the PROW Dimensions

These questions address potential conflict with:

Mobility Plan 2035 Policy 2.1 – *Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.*

Mobility Plan 2035 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.*

Mobility Plan 2035 Policy 3.2 – *People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.*

Mobility Plan 2035 Policy 2.10 – *Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.*

Mobility Plan 2035 Street Designations and Standard Roadway Dimensions

B.1 Does the project propose, above and beyond any PROW changes needed to comply with Section 12.37 of the LAMC as discussed in Section II.A, physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?

Examples of developer-initiated physical changes to the public right-of-way include:

- widening the roadway,
- narrowing the sidewalk,
- adding space for vehicle turn outs or loading areas,
- removing bicycle lanes, bike share stations, or bicycle parking

¹ LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>



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- modifying existing bus stop, transit shelter, or other street furniture
- paving, narrowing, shifting or removing an existing parkway or tree well

Yes No

B.2 Driveway Access

These questions address potential conflict with:

Mobility Plan 2035 Policy 2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.

Mobility Plan 2035 Program PL.1. Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.

Citywide Design Guidelines - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Site Planning Best Practices:

- *Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.*
- *Minimize both the number of driveway entrances and overall driveway widths.*
- *Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.*
- *Orient vehicular access as far from street intersections as possible.*
- *Place drive-thru elements away from intersections and avoid placing them so that they create a barrier between the sidewalk and building entrance(s).*
- *Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.*

B.2 Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT’s Driveway Design Guidelines (See Sec. 321 in the Manual of Policies and Procedures) by any of the following:

- locating new driveways for residential properties on an Avenue or Boulevard, and access is otherwise possible using an alley or a collector/local street, or
- locating new driveways for industrial or commercial properties on an Avenue or Boulevard and access is possible along a collector/local street, or
- the total number of new driveways exceeds 1 driveway per every 200 feet² along on the Avenue or Boulevard frontage, or
- locating new driveways on an Avenue or Boulevard within 150 feet from the intersecting street, or
- locating new driveways on a collector or local street within 75 feet from the intersecting street, or

² for a project frontage that exceeds 400 feet along an Avenue or Boulevard, the incremental additional driveway above 2 is more than 1 driveway for every 400 additional feet.



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- locating new driveways near mid-block crosswalks, requiring relocation of the mid-block crosswalk

Yes No

If the answer to **B.1 and B.2 are both NO**, then the project would not conflict with a plan or policies that govern the PROW as a result of the project-initiated changes to the PROW.

Impact Analysis

If the answer to either **B.1 or B.2 are YES**, City plans and policies should be reviewed in light of the proposed physical changes to determine if the City would be obstructed from carrying out the plans and policies. The analysis should pay special consideration to substantial changes to the Public Right of Way that may either degrade existing facilities for people walking and bicycling (e.g., removing a bicycle lane), or preclude the City from completing complete street infrastructure as identified in the Mobility Plan 2035, especially if the physical changes are along streets that are on the High Injury Network (HIN). The analysis should also consider if the project is in a Transit Oriented Community (TOC) area, and would degrade or inhibit trips made by biking, walking and/ or transit ridership. The streets that need special consideration are those that are included on the following networks identified in the Mobility Plan 2035, or the HIN:

- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network
- High Injury Network

To see the location of the above networks, see **Transportation Assessment Support Map**.³

Once the project is reviewed relevant to plans and policies, and existing facilities that may be impacted by the project, the analysis will need to answer the following two questions in concluding if there is an impact due to plan inconsistency.

B.2.1 Would the physical changes in the public right of way or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?

Yes No N/A

B.2.2 Would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the City from advancing the safety of vulnerable roadway users?

Yes No N/A

If either of the answers to either **B.2.1 or B.2.2 are YES**, the project may conflict with the Mobility Plan 2035, and therefore conflict with a plan that is adopted to protect the

³ LADOT Transportation Assessment Support Map <https://arcg.is/fubbD>



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environment. If either of the answers to both **B.2.1. or B.2.2. are NO**, then the project would not be shown to conflict with plans or policies that govern the Public Right-of-Way.

C. Network Access

C. 1 Alley, Street and Stairway Access

These questions address potential conflict with:

Mobility Plan Policy 3.9 Increased Network Access: Discourage the vacation of public rights-of-way.

C.1.1 Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?

Yes No

C.1.2 If the answer to C.1.1 is Yes, will the project provide or maintain public access to people walking and biking on the street, alley or stairway?

Yes No N/A

C.2 New Cul-de-sacs

These questions address potential conflict with:

Mobility Plan 2035 Policy 3.10 Cul-de-sacs: Discourage the use of cul-de-sacs that do not provide access for active transportation options.

C.2.1 Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?

Yes No

C.2.2 If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?

Yes No N/A

If the answers to either C.1.2 or C.2.2 are YES, then the project would not conflict with a plan or policies that ensures access for all modes of travel. If the answer to either **C.1.2 or C.2.2 are NO**, the project may conflict with a plan or policies that governs multimodal access to a property. Further analysis must assess to the degree that pedestrians and bicyclists have sufficient public access to the transportation network.

D. Parking Supply and Transportation Demand Management

These questions address potential conflict with:

Mobility Plan 2035 Policy 3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.

Mobility Plan 2035 Policy 4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.



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Mobility Plan 2035 Policy 4.13 – Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.

D.1 Would the project propose a supply of onsite parking that exceeds the baseline amount⁴ as required in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails?

Yes No

D.2 If the answer to D.1. is YES, would the project propose to actively manage the demand of parking by independently pricing the supply to all users (e.g. parking cash-out), or for residential properties, unbundle the supply from the lease or sale of residential units?

Yes No N/A

If the answer to **D.2. is NO** the project may conflict with parking management policies. Further analysis is needed to demonstrate how the supply of parking above city requirements will not result in additional (induced) drive-alone trips as compared to an alternative that provided no more parking than the baseline required by the LAMC or Specific Plan. If there is potential for the supply of parking to result in induced demand for drive-alone trips, the project should further explore transportation demand management (TDM) measures to further off-set the induced demands of driving and vehicle miles travelled (VMT) that may result from higher amounts of on-site parking. The TDM measures should specifically focus on strategies that encourage dynamic and context-sensitive pricing solutions and ensure the parking is efficiently allocated, such as providing real time information. Research has demonstrated that charging a user cost for parking or providing a ‘cash-out’ option in return for not using it is the most effective strategy to reduce the instances of drive-alone trips and increase non-auto mode share to further reduce VMT. To ensure the parking is efficiently managed and reduce the need to build parking for future uses, further strategies should include sharing parking with other properties and/or the general public.

D.3. Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?

Yes No

D.4. Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor?

Yes No

D.5 If the answer to D.4. is YES, does the project comply with the City’s TDM Ordinance in Section 12.26 J of the LAMC?

Yes No N/A

If the answer to **D.3. or D.5. is NO** the project conflicts with LAMC code requirements of bicycle parking and TDM measures. If the project includes uses that require bicycle parking (Section 12.21 A.16) or TDM (Section 12.26 J), and the project does not comply with those Sections of the LAMC, further analysis is required to ensure that the project supports the intent of the two LAMC sections. To meet the intent of

⁴ The baseline parking is defined here as the default parking requirements in section 12.21 A.4 of the Los Angeles Municipal Code or any applicable Specific Plan, whichever prevails, for each applicable use not taking into consideration other parking incentives to reduce the amount of required parking.



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bicycle parking requirements, the analysis should identify how the project commits to providing safe access to those traveling by bicycle and accommodates storing their bicycle in locations that demonstrates priority over vehicle access.

Similarly, to meet the intent of the TDM requirements of Section 12.26 J of the LAMC, the analysis should identify how the project commits to providing effective strategies in either physical facilities or programs that encourage non-drive alone trips to and from the project site and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks).

E. Consistency with Regional Plans

This section addresses potential inconsistencies with greenhouse gas (GHG) reduction targets forecasted in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS).

E.1 Does the Project or Plan apply one the City’s efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in **Section 2.2.3** of the TAG?
 Yes No

E.2 If the Answer to **E.1 is YES**, does the Project or Plan result in a significant VMT impact?
 Yes No N/A

E.3 If the Answer to **E.1 is NO**, does the Project result in a net increase in VMT?
 Yes No N/A

If the Answer to **E.2 or E.3 is NO**, then the Project or Plan is shown to align with the long-term VMT and GHG reduction goals of SCAG’s RTP/SCS.

E.4 If the Answer to **E.2 or E.3 is YES**, then further evaluation would be necessary to determine whether such a project or land use plan would be shown to be consistent with VMT and GHG reduction goals of the SCAG RTP/SCS. For the purpose of making a finding that a project is consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS, the project analyst should consult **Section 2.2.4** of the Transportation Assessment Guidelines (TAG). **Section 2.2.4** provides the methodology for evaluating a land use project's cumulative impacts to VMT, and the appropriate reliance on SCAG’s most recently adopted RTP/SCS in reaching that conclusion.

The analysis methods therein can further support findings that the project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to Section 65080(b)(2)(H) of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.



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References

BOE [Street Standard Dimensions S-470-1](#)

http://eng2.lacity.org/techdocs/stdplans/s-400/S-470-1_20151021_150849.pdf

LADCP [Citywide Design Guidelines](#).

https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide_Design_Guidelines.pdf

LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>

Mobility Plan 2035

https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

SCAG. Connect SoCal, 2020-2045 RTP/SCS, <https://www.connectsocial.org/Pages/default.aspx>