3.13 TRANSPORTATION AND TRAFFIC

INTRODUCTION

This section of the Draft EIR describes the transportation and traffic based on the Transportation Impact Analysis (TIA) prepared by Overland Traffic Consultants, Inc., (OTC) for the proposed project. OTC’s analysis was subject to several rounds of peer review by both the City Public Works Department staff and the City of Malibu’s consulting traffic engineer. This section also addresses impacts to pedestrian, transit, and bicycle facilities and users anticipated to result from construction and operation of the proposed project. All technical analyses related to the study are included in Appendix 3.13.

ENVIRONMENTAL SETTING

Vehicle Access and On-Site Circulation

Vehicles will access the project site via two proposed driveways: the primary driveway is planned on Civic Center Way near the west end of the project site opposite the Country Mart shopping Center driveway, a secondary driveway is planned on Cross Creek Road near the north end of the project site.

Internal vehicle circulation for the main parking area is provided with two-way driving aisles serving a 90 degree parking stall layout. The site is designed with a clockwise service access routing scheme utilizing a one-way northbound service road along the westerly property line to the loading dock area. Stop signs, stop lines, and crosswalks have been added within the parking lot to provide right-of-way control and guidance to motor vehicles and pedestrians.

Civic Center Way Access

The Civic Center Way driveway would serve as the main entrance and exit for the shopping center. The driveway exit would have a stop sign at its intersection with Civic Center Way. The driveway would accommodate vehicular access to all on-site parking and to the service road located along the westerly property line which also provides truck access to the loading docks located behind the proposed Whole Foods market. Full access would be provided at the Civic Center Way driveway (i.e., left-turn and right-turn ingress and egress).

The Civic Center Way driveway is proposed to be 44 feet wide consisting of two outbound lanes and one inbound lane. The Civic Center Way driveway is located approximately 270 feet west of the intersection of Civic Center Way and Cross Creek Road opposite the existing Country Mart commercial driveway. A center left-turn median lane is provided on Civic Center Way for left-turn access to and from the site.
Off-Site Street Improvements

The project proposes to remove four on-street parallel parking spaces located on the north side of Civic Center Way between the driveway and the Civic Center Way & Cross Creek Road as it improves the vehicle sight lines, truck access and eliminates parallel parking maneuvers that could block through traffic.

Cross Creek Road Access

The Cross Creek Road driveway would serve as the secondary vehicular entrance and exit for the shopping center. The Cross Creek Road driveway would accommodate vehicular access to all on-site parking. However, no 3-axle delivery trucks are permitted to use Cross Creek Road.

Full access would be provided at the Cross Creek Road driveway (i.e., left-turn and right-turn ingress and egress). The driveway is approximately 26 feet in width and located approximately 515 feet north of the intersection centerline of Civic Center Way and Cross Creek Road. The driveway would be signed for stop control at its intersection with Cross Creek Road.

Truck Access

Trucks entering the site from Civic Center Way would proceed to the one-way northbound service road located along the westerly property line to access the loading dock area behind the supermarket. The site has been designed to allow trucks leaving the loading dock area to exit through the parking lot to Civic Center Way. It is estimated that up to two semi-trailer delivery trucks would serve the site during off-peak hours. Other smaller vendor delivery trucks would arrive throughout the day and utilize the two loading spaces designated at each side of the site. (Refer to Section 3.10, Noise, for a discussion of potential operational noise impacts.)

Existing Roadway Network

The project site is located on the northwest corner of Civic Center Way and Cross Creek Road in the City of Malibu. Located to the north, northeast, and northwest of the site are single-family residential detached estate lots, and other notable land uses in the vicinity of the site include: Legacy Park, the Civic Center, and Malibu Country Mart.
The City has four roadway classifications that apply to the local road network including, Major Arterials, Minor Arterial, Collectors, and Locals.¹

- Major arterial roadways provide access from rural to urban areas and access to freeways. A typical major arterial consists of a 100-foot right-of-way with six lanes and controlled access, divided by a raised or striped median. Major arterials, serving as an intercity or community facility carry the majority of traffic between the City, adjacent communities, and the freeway system.

- Minor arterial streets provide through service to commercial areas and between cities and may also provide access to highways and freeways. A minor arterial typically consists of an 80-foot right-of-way with four lanes, typically with a raised or painted median.

- Collector streets collect traffic from local streets within residential areas. “Collectors” are typically characterized by both two-lane and four-lane undivided roadways with 64-foot rights-of-way. Collectors within this classification move moderate volumes of traffic through the community and serve as routes for locally generated traffic to connect to major and minor arterials.

- Local streets provide access to individual properties. “Locals” are two-lane, undivided roadways with frequent driveway access and 48- to 58-foot rights-of-way, although many of the City’s canyon access roads have less right-of-way. These roads are intended to provide access to adjacent residential land uses and to feed traffic to collectors and arterials.

The primary roadways in the project vicinity are described below and shown in Figure 3.13-1, Study Area Intersections:

**Pacific Coast Highway** (PCH, SR-1) is a state route that travels east and west through the study area. To the east in the City of Santa Monica, PCH turns into the Santa Monica Freeway (I-10) providing access to the greater Los Angeles basin. Project access to PCH is provided via the signalized intersections at Cross Creek Road and Webb Way. PCH provides four travel lanes (two in each direction) with a third eastbound lane provided on its eastbound approach to Webb Way. PCH would typically be designated a major arterial. However, given its topographical and safety constraints, PCH in the City is limited to four lanes and is designated as a modified major arterial. PCH is posted with a speed limit of 50 mph west of Malibu Canyon Road and 45 mph east of Malibu Canyon Road.

Traffic volumes on PCH, as recorded by Caltrans, range from approximately 58,000 vehicles per day east of Topanga Canyon Boulevard to approximately 30,000 vehicles per day east of Kanan Dume Road. In the vicinity of the project site, PCH carries approximately 46,000 vehicles per day east of Cross Creek Road. PCH is designated as a route in the Los Angeles County Congestion Management Plan (CMP).

¹ City of Malibu, 1995
Civic Center Way is designated an east-west minor arterial road in the City’s General Plan. Civic Center Way is a two-lane roadway (one lane in each direction) that connects Malibu Canyon Road on the west to Cross Creek Road on the east. Civic Center Way borders the south side of the project site.

Cross Creek Road is a north-south local street with one lane in each direction. South of Civic Center Way, Cross Creek Road is a public road that provides access to the abutting commercial development and connects to Pacific Coast Highway. North of Civic Center Way, Cross Creek Road borders the east side of the site, is a private road, and provides access to the residential area of Serra Retreat.

Webb Way is a north-south two-lane minor arterial roadway connecting Civic Center Way and Pacific Coast Highway.

Malibu Canyon Road (County Highway N1) is a north-south major arterial roadway that extends from PCH across the Santa Monica Mountains to the Ventura Freeway (Interstate 101). Malibu Canyon Road generally has one lane in each direction; two lanes are provided between Civic Center Way and Pacific Coast Highway. Near Mulholland Highway, Malibu Canyon Road becomes Las Virgenes Road. A significant volume of vehicle trips from western portions of Los Angeles County use various canyon roads like Malibu Canyon Road.

Traffic Safety and Operations on PCH

Traffic safety is an important concern to residents and public agencies along the 21-mile reach of PCH in the City. PCH serves as a major commuter route, providing access to local residential neighborhoods and business as well as to tens of thousands of beachgoers daily during the spring, summer, and fall months. In addition to serving as a major traffic arterial, PCH also supports high pedestrian and bicycle use, particularly along certain segments. The 2011 Pacific Coast Highway Traffic Safety Evaluation prepared by the Los Angeles County Sheriff’s Department (LASD) found that segments of PCH currently have inadequate capacity to carry existing commuter traffic volumes and are subject to gridlock on peak summer days. These conditions result in a more dangerous accident-prone roadway environment with the most common accident involving low-speed vehicle rear-end collisions. Additional concerns exist at particular intersections for the safety of pedestrian crossings and with bicycle traffic sharing travel lanes with traffic moving at 45 to 50 mph.

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OVERALL STUDY AREA
KANAN DUME ROAD TO LAS FLORES CANYON ROAD

WEST STUDY AREA
CIVIC CENTER STUDY AREA
EAST STUDY AREA

In the immediate Project vicinity, the PCH Traffic Safety Evaluation notes that the collision rate at the intersection of Malibu Canyon Road with PCH is the second highest in the City. Malibu Canyon Road carries the highest volume of traffic of any surface street in the City and regularly experiences southbound left turn vehicle queues of 0.5 mile in length, which reach from the intersection at PCH to (and sometimes beyond) the intersection with Civic Center Way. These queues exacerbate cut-through traffic past the schools and neighborhoods on Civic Center Way as motorists attempt to avoid delays associated with this queue.³

The PCH Traffic Safety Evaluation also identifies an existing lack of storage capacity on Webb Way and the PCH left turn lanes, as well as poor signal timing and a lack of sidewalks on the north side of PCH. Additionally, at the intersection of Cross Creek Road and PCH, the report identifies westbound congestion, poor signal timing, and lack of a sidewalk on the south side of PCH as key concerns.

Transit Service

Public transportation in the study area is provided by the Metropolitan Transportation Authority (Metro). Metro route 534 operates along Civic Center Way adjacent to the project site. Metro weekday service on this route is provided by three eastbound and seven westbound buses during the morning peak hours, five eastbound and three westbound buses during the afternoon peak hours, with three buses in each direction during the Saturday mid-day peak hours.

Traffic Study Intersections

To ensure updated, consistent traffic counts to be used for each pending project, traffic volume data was collected in the summer of 2012 by National Data & Surveying Services, an independent third party data collection company hired by the City of Malibu for use in this study. Weekday traffic counts were conducted on Thursday, July 12th from 7:00 to 9:00 AM and 4:00 to 6:00 PM. Weekend traffic counts were conducted on Saturday, July 14th from 11:00 AM to 1:00 PM.

The intersections analyzed in this study are listed below. Figure 3.13-1, Study Area Intersections, illustrates the location of the study intersections. An asterisk (*) identifies a CMP monitoring intersection.

1. Kanan Dume Road and Pacific Coast Highway *
2. Malibu Canyon Road and Pacific Coast Highway *

³ Left turns (southbound) from Malibu Canyon Road onto Civic Center Way are prohibited between 6:00 AM and 9:00 AM on weekdays (AM Peak hour). This measure was aimed at preventing cut through traffic, although exactly how effective the measure is has yet to be determined.
3.13 Transportation and Traffic

3. Malibu Canyon Road and Civic Center Way

4. Webb Way/Stuart Ranch Road and Civic Center Way

5. Cross Creek Road and Civic Center Way

6. Webb Way and Pacific Coast Highway

7. Cross Creek Road and Pacific Coast Highway

8. Malibu Pier Signal and Pacific Coast Highway

9. Carbon Canyon Road and Pacific Coast Highway

10. Las Flores Canyon Road and Pacific Coast Highway *

The street segments analyzed in this study are: (using July 2012, City of Malibu counts)

1. Pacific Coast Highway east of Cross Creek Road

2. Pacific Coast Highway west of Malibu Canyon Road

3. Malibu Canyon Road north of Civic Center Way

The existing 2012 peak hour traffic volumes at each study intersection are illustrated in **Figure 3.13-2, Existing 2012 Peak Hour Traffic Volumes – Weekday AM Peak Hour**, for the weekday morning peak hour, **Figure 3.13-3, Existing 2012 Peak Hour Traffic Volumes – Weekday PM Peak Hour**, for the weekday afternoon peak hour and **Figure 3.13-4, Existing 2012 Saturday – Mid-Day Peak Hour**, for the Saturday mid-day peak hour.

The July 2012 counts were conducted when Pepperdine was in summer session, which has a lower student population than during their regular sessions (i.e., the fall, winter, and spring sessions). Consequently, while PCH is typically busiest during the summer, it is likely that more Pepperdine or student-associated vehicles may be expected during the regular sessions. However, even when Pepperdine is in regular session, the traffic volumes on PCH are greatest during the summer season. In accordance with the City’s Traffic Impact Analysis Guidelines, the TIA did not include pedestrian or bicyclist counts.

The traffic conditions analysis was conducted using the Intersection Capacity Utilization (ICU) method. The ICU method uses a ratio of the traffic volume over intersection capacity to establish the level of traffic congestions. This volume-to-capacity (V/C) ratio defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming all approaches were operating at full capacity.
FIGURE 3.13-2

Existing 2012 Peak Hour Traffic Volumes – Weekday AM Peak Hour

Existing 2012 Peak Hour Traffic Volumes – Weekday PM Peak Hour

KANAN DUME ROAD & PACIFIC COAST HIGHWAY (SR 1)
MALIBU CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)
MALIBU CANYON ROAD & CIVIC CENTER WAY
CIVIC CENTER WAY & WEBB WAY / STUART RANCH ROAD
CIVIC CENTER WAY & CROSS CREEK ROAD
WEBB WAY & PACIFIC COAST HIGHWAY (SR 1)
CROSS CREEK ROAD & PACIFIC COAST HIGHWAY (SR 1)
MALIBU PIER SIGNAL & PACIFIC COAST HIGHWAY (SR 1)
CARBON CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)
LAS FLORES CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)

WEST STUDY AREA
CIVIC CENTER STUDY AREA
EAST STUDY AREA


FIGURE 3.13-3

Existing 2012 Peak Hour Traffic Volumes – Weekday PM Peak Hour
Existing 2012 Saturday – Mid-Day Peak Hour

FIGURE 3.13-4

**Intersection Operations**

Because traffic flow on arterials is most constrained at intersections, detailed traffic flow analyses focus on operating conditions of critical intersections during peak travel periods. The quality of service offered by any roadway can be described by measuring its level of service (LOS), a qualitative method for describing operational conditions within a traffic stream or at an intersection, generally in terms of such service measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. In rating intersection operations, LOS A through F are used, where LOS A indicates free flow operations and LOS F indicates congested operations. The City, through its Traffic Impact Analysis Guidelines, considers LOS C as the minimum acceptable operating standard for intersections for signalized and unsignalized intersections in the City during peak hour traffic.

The Transportation Research Board’s (TRB) 2000 Highway Capacity Manual (HCM) is the standard used for evaluating all types of LOS (e.g., signalized, unsignalized, freeways, or intersections). The V/C ratio and the average control delay are used to determine intersection the LOS for signalized and unsignalized (e.g., stop sign controlled) intersections respectively.

The LOS criteria for unsignalized intersections have different threshold values than those for signalized intersections primarily because drivers expect different levels of performance from different types of transportation facilities. The expectation is that a signalized intersection is designed to carry higher traffic volumes than an unsignalized intersection. Thus, a higher level of control-related delay is acceptable at a signalized intersection for the same LOS. The LOS criteria are summarized in **Table 3.13-1, LOS Criteria for Signalized and Unsignalized Intersections**.

LOS was calculated for the area intersections using the ICU and HCM procedures to calculate the V/C ratios and delay values for existing traffic conditions at each TIA intersection. Existing signalized intersections in the project area generally operate at acceptable stable conditions of LOS C or better (refer to **Table 3.13-2 Existing Traffic Conditions Summary**; see **Figure 3.13-2** through **Figure 3.13-4**). Two intersections currently operate at LOS C during the weekday PM peak hours, while all other signalized intersections operating at LOS A or B. During the weekend peak hour four intersections operate at LOS C, while all other signalized intersections operate at LOS A or B.
### Table 3.13-1
**LOS Criteria for Signalized and Unsignalized Intersections**

<table>
<thead>
<tr>
<th>LOS</th>
<th>Description</th>
<th>Signalized (V/C Ratio)</th>
<th>Unsignalized Average Control Delay (seconds)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Free flow conditions with low traffic density</td>
<td>0.000–0.600</td>
<td>&lt;10</td>
</tr>
<tr>
<td>B</td>
<td>A stable flow of traffic</td>
<td>0.601–0.700</td>
<td>&gt;10–15</td>
</tr>
<tr>
<td>C</td>
<td>Light congestion but stable, occasional backups behind left-turning vehicles</td>
<td>0.701–0.800</td>
<td>&gt;15–25</td>
</tr>
<tr>
<td>D</td>
<td>Approaching instability, drivers are restricted, vehicles may be required to wait through more than one signal cycle</td>
<td>0.801–0.900</td>
<td>&gt;25–35</td>
</tr>
<tr>
<td>E</td>
<td>At or near capacity with long queuing for left-turning vehicles. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.</td>
<td>0.901–1.000</td>
<td>&gt;35–50</td>
</tr>
<tr>
<td>F</td>
<td>Jammed conditions with stoppages of long distances.</td>
<td>&gt;1.000</td>
<td>&gt;50</td>
</tr>
</tbody>
</table>

*Source: Overland Traffic Consultants, 2015*

### Table 3.13-2
**Existing Traffic Conditions Summary**

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>AM Peak Hour V/C (Delay)</th>
<th>AM Peak Hour LOS</th>
<th>PM Peak Hour V/C (Delay)</th>
<th>PM Peak Hour LOS</th>
<th>Weekend Mid-Day V/C (Delay)</th>
<th>Weekend Mid-Day LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Kanan Dume Rd. &amp; Pacific Coast Hwy.</td>
<td>0.394</td>
<td>A</td>
<td>0.633</td>
<td>B</td>
<td>0.715</td>
<td>C</td>
</tr>
<tr>
<td>2.</td>
<td>Malibu Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>0.674</td>
<td>B</td>
<td>0.669</td>
<td>B</td>
<td>0.777</td>
<td>C</td>
</tr>
<tr>
<td>3.</td>
<td>Malibu Canyon Rd. &amp; Civic Center Way</td>
<td>0.503</td>
<td>A</td>
<td>0.472</td>
<td>A</td>
<td>0.346</td>
<td>A</td>
</tr>
<tr>
<td>6.</td>
<td>Webb Way &amp; Pacific Coast Hwy.</td>
<td>0.526</td>
<td>A</td>
<td>0.661</td>
<td>B</td>
<td>0.703</td>
<td>C</td>
</tr>
<tr>
<td>7.</td>
<td>Cross Creek Rd. &amp; Pacific Coast Hwy.</td>
<td>0.594</td>
<td>A</td>
<td>0.781</td>
<td>C</td>
<td>0.800</td>
<td>C</td>
</tr>
<tr>
<td>8.</td>
<td>Malibu Pier Signal &amp; Pacific Coast Hwy.</td>
<td>0.576</td>
<td>A</td>
<td>0.655</td>
<td>B</td>
<td>0.638</td>
<td>B</td>
</tr>
<tr>
<td>9.</td>
<td>Carbon Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>0.538</td>
<td>A</td>
<td>0.644</td>
<td>B</td>
<td>0.648</td>
<td>B</td>
</tr>
<tr>
<td>10.</td>
<td>Las Flores Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>0.581</td>
<td>A</td>
<td>0.691</td>
<td>B</td>
<td>0.679</td>
<td>B</td>
</tr>
</tbody>
</table>

*Source: Overland Traffic Consultants, 2015*
REGULATORY FRAMEWORK

Federal Regulations

**Americans with Disabilities Act of 1990:** Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warning for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

State Regulations

Traffic analysis in the State of California is guided by policies and standards set at the state level by the California Department of Transportation (Caltrans) and the local jurisdictions. The proposed project is within the City’s jurisdiction and, therefore, subject to adopted City transportation policies and guidelines, which are consistent with Caltrans policies and standards. Furthermore, Caltrans retains jurisdiction over PCH in Malibu and would be responsible for any permitting related to the highway. In addition, seven of the intersections analyzed are located on PCH, which is part of the Los Angeles County CMP.

Local Regulations

**City of Malibu General Plan**

The City of Malibu’s General Plan provides the following goals and policies related to transportation:

**Land Use Element**

**LU Policy 2.4.6** The City shall avoid improvements which create a suburban atmosphere such as sidewalks and street lights.

**Conservation Element**

**C Goal 1:** Safe, environmentally sensitive and efficient transportation for the City.

**C Policy 1.1.1** Where level of service at signalized intersections and roadways is below LOS C, the City shall ensure that proposed development maintains the then–current...
LOS. Where LOS at signalized intersections and roadways is at LOS C or above, the City shall ensure that proposed development: (1) does not cause a degradation of LOS greater than or equal to 2 percent in the circumstances set forth in Land Use Implementation Measure 70; and (2) does not degrade LOS below LOS C.

C Policy 1.1.2 The City shall utilize sound traffic engineering and enforcement principles to safely regulate traffic and improve traffic flow.

C Policy 1.1.3 The City shall improve traffic flow through procedural improvements.

C Policy 1.1.4 The City shall reduce peak-time traffic.

C Policy 1.2.1 The City shall promote a balanced and integrated transportation system and reduce dependence on the automobile.

C Policy 1.2.2 The City shall encourage the use of alternative modes of transportation.

C Policy 1.2.3 The City shall develop year round local and regional public transportation.

C Policy 1.2.4 The City shall develop bikeways, pedestrian walkways, and equestrian paths in areas that can safely accommodate them.

C Policy 1.3.1 The City shall require sufficient off-street parking.

City of Malibu Local Coastal Program

The City lies entirely within with the California Coastal Zone, as defined by the California Coastal Act. The Coastal Act requires that its goals and policies be implemented by local government through the Local Coastal Program (LCP) process. The LCP is composed of two plans: the Land Use Plan (LUP) and the Local Implementation Plan (LIP). The LCP was adopted by the California Coastal Commission on September 13, 2002.

Land Use Plan

The LUP has several policies regarding circulation and traffic. The policies relevant to the proposed project include:
LUP Policy 7.3: Improvements to existing public roads shall be permitted as necessary for public safety and to improve access to recreation areas where such improvements are consistent with all policies of the LCP.

LUP Policy 7.4: Improvements to major road intersections for public safety or increase vehicle capacity shall be permitted, as necessary, in existing developed areas and where such improvements are sited and designed to be consistent with all policies of the LCP.

LUP Policy 7.12: Restrictions on or elimination of existing on-street public parking on PCH and adjacent side-streets shall not be permitted unless a comparable number of replacement parking spaces are provided in the immediate vicinity and it is demonstrated that such restrictions or elimination will not adversely impact public access to the shoreline.

Local Implementation Plan

The LIP implements the policies of the LUP of the LCP. The implementation measures governing traffic and circulation under various sections of the LIP are as follows:

Section 3.12 The purpose of the Parking Regulations section of the LIP is to ensure adequate off-street parking facilities in conjunction with any residential, commercial, or other use or development. These standards provided in the section should be considered the minimum required for preserving the public health, safety, and welfare. LIP Section 3.12.3, related to specific parking requirements, details parking requirements in accordance with the list of uses. LIP Section 3.12.5 provides development standards for parking facilities.

Apart from these parking regulations, there are no other implementation actions in the LIP pertaining to traffic and circulation.

City of Malibu Municipal Code

The Malibu Municipal Code (MMC) contains the laws of the City. Title 17 of the MMC specifically discusses the zoning regulations pertaining to new development. Chapter 17.48 pertains to off-street parking and loading requirements, including the following, which apply to all parking areas with six or more spaces:
17.48.050(C)(3)  **Screening.** Parking areas shall be screened from view from all designated highways.

17.48.050(E)  **Landscaping.**

1. A landscaped planter bed of at least 5 feet in width with a 6-inch-high cement concrete berm shall be installed along the entire perimeter except for those areas devoted to perpendicular access ways;

2. A minimum of 5 percent of the paved parking area shall be devoted to interior planting areas. Extensive use of trees is encouraged. All planting areas shall be at least 3-feet-wide. Perimeter planting shall not be considered part of this required interior planting; and

3. Where topography and gradient allow, parking lots should be depressed and/or screened from view by landscaped berms and hedges.

17.48.050(F)  **Lighting.** Lighting, where provided to illuminate a parking area, shall be hooded and so arranged and controlled so as not to cause nuisance either to highway traffic or to adjacent properties.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

The following thresholds for determining the significance of impacts related to transportation are contained in the environmental checklist form contained in Appendix G of the most recent update of the *California Environmental Quality Act (CEQA) Statutes and Guidelines*. Impacts related to aesthetics are considered significant if the proposed project would:

- 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.

The following significance thresholds for determining transportation and traffic impacts were identified by the City. The City considers a traffic impact to be potentially significant if the related increases in the V/C ratio value equals or exceeds adopted thresholds for signalized intersections or unsignalized intersections (refer to Tables 3.13-3 and 3.15-4). Additionally, a significant traffic impact for an arterial street would occur if the V/C ratio on a CMP roadway segment operating at an unacceptable LOS (i.e., LOS D, E, or F) increases by 0.05 or more.
Table 3.13-3
Significant Impact Criteria (Signalized Intersections)

<table>
<thead>
<tr>
<th>LOS</th>
<th>Final V/C Value</th>
<th>Increase in V/C Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>&gt; 0.710 – 0.800</td>
<td>+0.040 or more</td>
</tr>
<tr>
<td>D</td>
<td>&gt; 0.810 – 0.900</td>
<td>+0.020 or more</td>
</tr>
<tr>
<td>E, F</td>
<td>0.91 or more</td>
<td>+0.010 or more</td>
</tr>
</tbody>
</table>

Source: Overland Traffic Consultants, 2015

Table 3.13-4
Significant Traffic Impact Criteria (Un-signalized Intersections)

1. Degrades the Level of Service (LOS) at an un-signalized intersection to an unacceptable level of Service (LOS D or worse); or
2. Increases delay at an un-signalized intersection operating at an unacceptable level by five or more seconds; or
3. Results in satisfying the most recent California Manual on Uniform Traffic Control Devices (CAMUTCD) peak hour volume warrant or other warrants for traffic signal installation at the intersection.

Source: Overland Traffic Consultants, 2015

- 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?
- 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.
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Methodology

The traffic impacts of the proposed project were evaluated in the TIA using trip generation, trip distribution, and trip assignment for four scenarios including a No Project Scenario and a Plus Project Scenario for Existing Year (2012) and Future Years (2017 and 2030) scenarios. Estimates of project-generated traffic were calculated using the industry standard 2012 traffic generation rates developed by the Institute of Transportation Engineers (ITE). The estimated project directional trip distribution was based on the project area roadway network, traffic flow patterns in and out of the project area, and other...
traffic studies recently prepared for the general area. Using the traffic assignment at each intersection and
the estimated project traffic generation, peak hour traffic volumes at each study location were calculated
for each peak hour and for each scenario. This estimated assignment of the project traffic flow provided
the information necessary to analyze the potential project traffic impacts.

Future traffic volume projections have been developed to analyze the traffic conditions after completion
of other planned land developments including the proposed project for two scenarios: future study years
2017 and 2030. In addition to the traffic generated by the related project list, other projects outside the
study area or projects unknown at this time may contribute to the traffic volume in the area. To account
for this outside influence, an ambient annual growth factor (1.5 percent) has been applied to the existing
2012 traffic counts to establish the 2017 study year. This growth factor is based on the growth rates in the
City TIA Guidelines for the 2017 study year. The use of both the related project traffic volume growth and
the ambient growth factor provides a conservative estimate of future traffic growth in the study area
for 2017.

**Los Angeles Congestion Management Program Analysis**

The adopted Los Angeles Congestion Management Program (CMP) traffic growth forecasts for 2030 have
been applied to develop the future traffic volumes for 2030. In addition to the CMP growth, the same
current cumulative projects list has been included. Therefore, the total growth for the 2030 project impact
analysis consists of the CMP growth rate (9 percent) plus the current related projects per the City of
Malibu’s cumulative projects list.

Adding the project traffic to the two future “without project” conditions provides the information
necessary to calculate the future cumulative project traffic impacts at the study intersections for each
future scenario.

**Impact Analysis**

**Threshold 3.13-1** 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 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. A significant impact would occur if the proposed project
exceeded adopted thresholds for signalized intersections or unsignalized
intersections (refer to Tables 3.13-3 and 3.13-4) or result in V/C ratio on a CMP
roadway segment operating at an unacceptable LOS (i.e., LOS D, E, or F)
increases by 0.05 or more.
Existing (2012) Conditions

As shown in Table 3.13-5, Existing Plus Project Traffic Conditions, during the Existing Year (2012) all of the study intersections operate at an acceptable LOS. The traffic estimates show that the proposed project would generate 2,290 weekday vehicle trips with 101 AM peak hour trips and 154 PM peak hour trips. In addition, the proposed project would generate an estimate 2,528 weekend trips with 226 weekend mid-day trips. Project traffic volumes are shown in Figure 3.13-5, Project Traffic Volume – Weekday AM Peak Hour, Figure 3.13-6, Project Traffic Volume – Weekday PM Peak Hour, and Figure 3.13-7, Project Traffic Volume – Saturday Mid-Day Peak Hour

Table 3.13-5
Existing Plus Project Traffic Conditions

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Existing V/C (Delay)</th>
<th>LOS</th>
<th>With Project V/C (Delay)</th>
<th>LOS</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Kanan Dume Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.394</td>
<td>A</td>
<td>0.397</td>
<td>A</td>
<td>+0.003</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.633</td>
<td>B</td>
<td>0.639</td>
<td>B</td>
<td>+0.006</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.715</td>
<td>C</td>
<td>0.721</td>
<td>C</td>
<td>+0.006</td>
</tr>
<tr>
<td>2</td>
<td>Malibu Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.674</td>
<td>B</td>
<td>0.684</td>
<td>B</td>
<td>+0.010</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.669</td>
<td>B</td>
<td>0.677</td>
<td>B</td>
<td>+0.008</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.777</td>
<td>C</td>
<td>0.789</td>
<td>C</td>
<td>+0.012</td>
</tr>
<tr>
<td>3</td>
<td>Malibu Canyon Rd. &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>0.503</td>
<td>A</td>
<td>0.506</td>
<td>A</td>
<td>+0.003</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.472</td>
<td>A</td>
<td>0.480</td>
<td>A</td>
<td>+0.008</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.346</td>
<td>A</td>
<td>0.346</td>
<td>A</td>
<td>+0.000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>22.15 sec.</td>
<td>C</td>
<td>23.08 sec.</td>
<td>C</td>
<td>+0.93 sec.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>9.73 sec.</td>
<td>A</td>
<td>10.28 sec.</td>
<td>B</td>
<td>+0.55 sec.</td>
</tr>
<tr>
<td>5</td>
<td>Cross Creek Rd. &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>7.80 sec.</td>
<td>A</td>
<td>8.00 sec.</td>
<td>A</td>
<td>+0.20 sec.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>9.10 sec.</td>
<td>A</td>
<td>10.00 sec.</td>
<td>A</td>
<td>+0.90 sec.</td>
</tr>
<tr>
<td>6</td>
<td>Webb Way &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.526</td>
<td>A</td>
<td>0.527</td>
<td>A</td>
<td>+0.001</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.661</td>
<td>B</td>
<td>0.679</td>
<td>B</td>
<td>+0.018</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.703</td>
<td>C</td>
<td>0.728</td>
<td>C</td>
<td>+0.025</td>
</tr>
<tr>
<td>7</td>
<td>Cross Creek Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.594</td>
<td>A</td>
<td>0.601</td>
<td>B</td>
<td>+0.007</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.781</td>
<td>C</td>
<td>0.806</td>
<td>D</td>
<td>+0.025 *</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.800</td>
<td>C</td>
<td>0.837</td>
<td>D</td>
<td>+0.037 *</td>
</tr>
<tr>
<td>8</td>
<td>Malibu Pier Signal &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.576</td>
<td>A</td>
<td>0.582</td>
<td>A</td>
<td>+0.006</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.655</td>
<td>B</td>
<td>0.667</td>
<td>B</td>
<td>+0.012</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.638</td>
<td>B</td>
<td>0.654</td>
<td>B</td>
<td>+0.016</td>
</tr>
<tr>
<td>9</td>
<td>Carbon Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.538</td>
<td>A</td>
<td>0.543</td>
<td>A</td>
<td>+0.005</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.644</td>
<td>B</td>
<td>0.653</td>
<td>B</td>
<td>+0.009</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.648</td>
<td>B</td>
<td>0.662</td>
<td>B</td>
<td>+0.014</td>
</tr>
<tr>
<td>10</td>
<td>Las Flores Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.581</td>
<td>A</td>
<td>0.584</td>
<td>A</td>
<td>+0.003</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.691</td>
<td>B</td>
<td>0.700</td>
<td>B</td>
<td>+0.009</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.679</td>
<td>B</td>
<td>0.690</td>
<td>B</td>
<td>+0.011</td>
</tr>
</tbody>
</table>

Note: All-Way Stop Control Delay in Seconds Per Vehicle; * Denotes significant traffic impact.
Source: Overland Traffic Consultants, 2015
As shown in Table 3.13-5, one study intersection would impacted by the proposed project traffic volume. Using the criteria in the City’s TIA Guidelines, it has been determined that the change in traffic flow generated by the proposed project would significantly impact the intersection of Cross Creek Road and Pacific Coast Highway (study intersection #7) during the weekday afternoon and Saturday mid-day peak prior to the implementation of traffic mitigation measures. Existing plus project traffic volumes are shown in Figure 3.13-8, Existing (2012) + Project Traffic Volume – Weekday AM Peak Hour, Figure 3.13-9, Existing (2012) + Project Traffic Volume – Weekday PM Peak Hour, and Figure 3.13-10, Existing (2012) + Project Traffic Volume – Saturday Mid-Day Peak Hour.

**Future Year (2017 and 2030) Conditions**

Future traffic volume projections were developed to analyze the traffic conditions after completion of other planned land developments including the proposed project for two scenarios: future study years 2017 and 2030.

In addition to the traffic generated by the related project list, other projects outside the study area or projects unknown at this time may contribute to the traffic volume in the area. To account for this outside influence, an ambient annual growth factor (1.5 percent) has been applied to the existing 2012 traffic counts to establish the 2017 study year. This growth factor is based on the growth rates in the City TIA Guidelines for the 2017 study year. The use of both the related project traffic volume growth and the ambient growth factor provides a conservative estimate of future traffic growth in the study area for 2017. 2017 Traffic Volumes are shown in Figure 3.13-11, Future (2017) Traffic Volume Without Project – Weekday AM Peak Hour, Figure 3.13-12, Future (2017) Traffic Volume Without Project – Weekday PM Peak Hour, and Figure 3.13-13, Future (2017) Traffic Volume Without Project – Saturday Mid-Day Peak Hour.

Adding the project traffic to the two future “without project” conditions provides the information necessary to calculate the future cumulative project traffic impacts at the study intersections for each future scenario. Table 3.13-6, Future (2017) + Project Traffic Conditions shows the estimated project traffic impacts for the 2017 study year. Future cumulative 2017 peak hour traffic volumes with the proposed project are shown in Figure 3.13-14, Future (2017) Traffic Volume + Project - Weekday AM Peak Hour, Figure 3.13-15, Future (2017) Traffic Volume + Project - Weekday PM Peak Hour, and Figure 3.13-16, Future (2017) Traffic Volume + Project - Saturday Mid-Day Peak Hour.
Existing (2012) + Project Traffic Volume – Weekday AM Peak Hour

FIGURE 3.13-8

FIGURE 3.13-9

Existing (2012) + Project Traffic Volume – Weekday PM Peak Hour

Existing (2012) + Project Traffic Volume – Saturday Mid-Day Peak Hour

**Figure 3.13-10**

**Source:** Overland Traffic Consultants, Inc., July 2013
Future (2017) Traffic Volume Without Project – Weekday PM Peak Hour

FIGURE 3.13-12

Based on the 2017 analysis, three intersections are significantly impacted. The intersections are: Malibu Canyon Road and Pacific Coast Highway during the Saturday mid-day peak hour; Pacific Coast Highway and Webb Way during the Saturday mid-day peak hour; and Pacific Coast Highway and Cross Creek Road during the weekday afternoon peak hour and the Saturday mid-day peak hour.

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Without Project V/C (Delay)</th>
<th>With Project V/C (Delay)</th>
<th>Impact</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Kanan Dume Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.485</td>
<td>0.489</td>
<td>A</td>
<td>A   +0.004</td>
</tr>
<tr>
<td>2.</td>
<td>Malibu Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.778</td>
<td>0.786</td>
<td>C</td>
<td>C   +0.008</td>
</tr>
<tr>
<td>3.</td>
<td>Malibu Canyon Rd. &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>0.528</td>
<td>0.534</td>
<td>A</td>
<td>A   +0.003</td>
</tr>
<tr>
<td>5.</td>
<td>Cross Creek Rd. &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>8.98 sec.</td>
<td>9.34 sec.</td>
<td>B</td>
<td>B   +0.36 sec.</td>
</tr>
<tr>
<td>6.</td>
<td>Webb Way &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.589</td>
<td>0.590</td>
<td>A</td>
<td>A   +0.001</td>
</tr>
<tr>
<td>7.</td>
<td>Cross Creek Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.675</td>
<td>0.682</td>
<td>B</td>
<td>B   +0.007</td>
</tr>
<tr>
<td>8.</td>
<td>Malibu Pier Signal &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.647</td>
<td>0.653</td>
<td>B</td>
<td>B   +0.006</td>
</tr>
<tr>
<td>9.</td>
<td>Carbon Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.616</td>
<td>0.619</td>
<td>B</td>
<td>B   +0.003</td>
</tr>
<tr>
<td>10</td>
<td>Las Flores Canyon Rd.</td>
<td>Weekday AM</td>
<td>0.656</td>
<td>0.660</td>
<td>B</td>
<td>B   +0.004</td>
</tr>
</tbody>
</table>

**Table 3.13-6**

**Future (2017) + Project Traffic Conditions**

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Note: All-Way Stop Control Delay in Seconds Per Vehicle; * Denotes significant traffic impact.

Source: Overland Traffic Consultants, January 2015
Mitigation Measures

The proposed project shall implement the following mitigation measures for project related traffic impacts.

Existing Plus Project

3.13-1: The project applicant shall contribute its pro-rata share of the costs associated with the intersection improvements required at Pacific Coast Highway and Cross Creek Road, which are currently underling review by the City of Malibu Planning Department (CDP No. 14-036). These intersection improvements shall consist of the construction of an additional westbound right-turn lane along Pacific Coast Highway and incremental roadway widening west and east of the Pacific Coast Highway/Cross Creek Road to provide additional right-turn capacity. Figure 3.13-17, Traffic Mitigation Plan, Cross Creek Road & Pacific Coast Highway, illustrates the design of the Cross Creek Road/Pacific Coast Highway intersection improvement. The pro-rata share of the improvement costs shall be determined by the City of Malibu prior to the issuance of building permits. The City shall verify that all pro-rata funds have been received for the improvements prior to issuance of building permits. Additionally, the City shall verify that the improvements have been constructed prior to final Planning Department inspection.

Future (2017) Plus Project

3.13-2: The project applicant shall contribute its pro-rata share of the costs associated with roadway improvements at the intersection of Malibu Canyon Road and Pacific Coast Highway. The improvements shall consist of restriping the south leg of the intersection to include a left-turn lane, one through lane and one right-turn lane. In addition, the project applicant shall fund traffic signal improvements for the intersection consisting of installing a northbound right turn overlap phase to run concurrently with the westbound left turn phase. Figure 3.13-18, Traffic Mitigation Plan, Malibu Canyon Road & Pacific Coast Highway, illustrates the design of the Malibu Canyon Road and Pacific Coast Highway intersection improvements. The pro-rata share of the improvement costs shall be determined by the City of Malibu prior to the issuance of building permits. The City shall verify that all pro-rata funds have been received for the improvements prior to issuance of building permits. Additionally, the City shall verify that the improvements have been constructed prior to final Planning Department inspection.
Conceptual Traffic Mitigation, Cross Creek Road & Pacific Coast Highway

3.13-3: The project applicant shall fund the construction of dual eastbound left-turn lanes at the eastbound approach to the intersection of Pacific Coast Highway and Webb Way. Prior to construction, all applicable permits shall be obtained from Caltrans. Figure 3.13-19, Traffic Mitigation Plan, Webb Way & Pacific Coast Highway, illustrates the design of the Pacific Coast Highway intersection improvements. The pro-rata share of the improvement costs shall be determined by the City of Malibu prior to the issuance of building permits. The City shall verify that all pro-rata funds have been received for the improvements prior to issuance of building permits. Additionally, the City shall verify that the improvements have been constructed prior to final Planning Department inspection.

Residual Impacts

As shown in Table 3.13-7, Existing (2012) Traffic Conditions with Project + Mitigation below, the impact at Cross Creek Road and Pacific Coast Highway would be mitigated with the implementation of Mitigation Measure 3.13-1

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Existing V/C (Delay)</th>
<th>LOS</th>
<th>With Project + Mitigation V/C (Delay)</th>
<th>LOS</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>Cross Creek Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.594</td>
<td>A</td>
<td>0.601</td>
<td>B</td>
<td>+ 0.007</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.781</td>
<td>C</td>
<td>0.736</td>
<td>C</td>
<td>-0.045</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.800</td>
<td>C</td>
<td>0.751</td>
<td>C</td>
<td>-0.046</td>
</tr>
</tbody>
</table>

Note: All-Way Stop Control Delay in Seconds Per Vehicle; * Denotes significant traffic impact.
Source: Overland Traffic Consultants, January 2015

As shown in Table 3.13-8, Future (2017) Traffic Conditions With Project + Mitigation, below, the impact at the intersections of Malibu Canyon Road and Pacific Coast Highway and the intersection of Webb Way and Pacific Coast Highway would be mitigated with the implementation of Mitigation Measure 3.13-2 and Mitigation Measure 3.13-3. Implementation of Mitigation Measure 3.13-1 would mitigate impacts at the intersection of Cross Creek Road and Pacific Coast Highway.
Table 3.13-8
Future (2017) Traffic Conditions With Project + Mitigation

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Without Project</th>
<th>With Project + Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>V/C (Delay)</td>
<td>LOS</td>
</tr>
<tr>
<td>2</td>
<td>Malibu Canyon Rd</td>
<td>Weekday AM</td>
<td>0.773</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>Pacific Coast Hwy.</td>
<td>Weekday PM</td>
<td>0.810</td>
<td>D</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.937</td>
<td>E</td>
</tr>
<tr>
<td>6</td>
<td>Webb Way &amp;</td>
<td>Weekday AM</td>
<td>0.589</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td>Pacific Coast Hwy</td>
<td>Weekday PM</td>
<td>0.843</td>
<td>D</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.891</td>
<td>D</td>
</tr>
<tr>
<td>7</td>
<td>Cross Creek Road &amp;</td>
<td>Weekday AM</td>
<td>0.675</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>Pacific Coast Hwy</td>
<td>Weekday PM</td>
<td>0.976</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>1.011</td>
<td>F</td>
</tr>
</tbody>
</table>

Note: All-Way Stop Control Delay in Seconds Per Vehicle; * Denotes significant traffic impact.
Source: Overland Traffic Consultants, January 2015

Threshold 3.13-2

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.

The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then the local jurisdiction must prepare a deficiency plan to be in conformance with the LA County CMP. The intent of the CMP is to provide information to decision makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process.

A CMP traffic impact analysis is required if a project will add 150 or more trips to a freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. All of the CMP intersections listed below are analyzed in this study.

- Las Flores Canyon Road and Pacific Coast Highway
- Malibu Canyon Road and Pacific Coast Highway
- Kanan Dume Road and Pacific Coast Highway
For the purposes of the CMP, a significant traffic impact occurs when the proposed project increases the V/C ratio by 2 percent or more at LOS F or causes LOS F. The City of Malibu’s traffic impact criteria are more stringent and were therefore applied to the CMP Intersections. As shown in Tables 3.13-5 and 3.13-6 the only CMP intersection that would exceed the City’s traffic impact criteria is Malibu Canyon Road and Pacific Coast Highway in 2017. As shown in Table 3.13-8, application of Mitigation Measure 3.13.2 would reduce this impact to less than significant.

The adopted Los Angeles Congestion Management Program (CMP) traffic growth forecasts for 2030 have been applied to develop the future traffic volumes for 2030. In addition to the CMP growth, the same current cumulative projects list has been included. Therefore, the total growth for the 2030 project impact analysis consists of the CMP growth rate (9 percent) plus the current related projects per the City of Malibu’s cumulative projects list. The future traffic conditions with and without the project are shown in Table 3.13-9, Future (2030) + Project Traffic Conditions. Future year (2030) traffic volumes without the project are shown in Figure 3.13-20, Future (2030) Traffic Volume Without Project – Weekday AM Peak Hour, Figure 3.13-21, Future (2030) Traffic Volume Without Project – Weekday PM Peak Hour, and Figure 3.13-22, Future (2030) Traffic Volume Without Project – Saturday Mid-Day Peak Hour. Future (2030) Conditions with the proposed project are shown in Figure 3.13-23, Future (2030) Traffic Volume + Project – Weekday AM Peak Hour, Figure 3.13-24, Future (2030) Traffic Volume + Project – Weekday PM Peak Hour, and Figure 3.13-25, Future (2030) Traffic Volume + Project – Saturday Mid-Day Peak Hour.

This study also analyzed the potential impacts of project traffic on the arterial streets serving the project site. The three street segments analyzed include:

1. Pacific Coast Highway east of Cross Creek Road,
2. Pacific Coast Highway west of Malibu Canyon Road and
3. Malibu Canyon Road north of Civic Center Way.

The methodology for determining arterial street impacts is based on a comparison of the future without and future with project conditions. The percentage increase in peak hour traffic is used as the measurement for the impact evaluation. Pursuant to the City TIA Guidelines, a significant traffic impact for an arterial street occurs if the volume-to-capacity (V/C) ratio on a roadway segment operating at an unacceptable level of Service (LOS D, E, or F) increases by 0.05 or more.
Table 3.13-9
Future (2030) + Project Traffic Conditions

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Peak Hour</th>
<th>Without Project</th>
<th>With Project</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>V/C (Delay)</td>
<td>LOS</td>
<td>V/C (Delay)</td>
</tr>
<tr>
<td>1.</td>
<td>Kanan Dume Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.490</td>
<td>A</td>
<td>0.493</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.787</td>
<td>C</td>
<td>0.793</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.881</td>
<td>D</td>
<td>0.887</td>
</tr>
<tr>
<td>2.</td>
<td>Malibu Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.781</td>
<td>C</td>
<td>0.791</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.822</td>
<td>D</td>
<td>0.830</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.946</td>
<td>E</td>
<td>0.957</td>
</tr>
<tr>
<td>3.</td>
<td>Malibu Canyon Rd. &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>0.539</td>
<td>A</td>
<td>0.542</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.372</td>
<td>A</td>
<td>0.372</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.376</td>
<td>A</td>
<td>0.376</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>55.58 sec.</td>
<td>F</td>
<td>57.26 sec.</td>
</tr>
<tr>
<td>5.</td>
<td>Cross Creek Rd. &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>9.00 sec.</td>
<td>A</td>
<td>9.36 sec.</td>
</tr>
<tr>
<td>6.</td>
<td>Webb Way &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.594</td>
<td>A</td>
<td>0.595</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.821</td>
<td>D</td>
<td>0.839</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.899</td>
<td>D</td>
<td>0.924</td>
</tr>
<tr>
<td>7.</td>
<td>Cross Creek Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.681</td>
<td>B</td>
<td>0.688</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.985</td>
<td>E</td>
<td>1.010</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>1.021</td>
<td>F</td>
<td>1.058</td>
</tr>
<tr>
<td>8.</td>
<td>Malibu Pier Signal &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.653</td>
<td>B</td>
<td>0.660</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.781</td>
<td>C</td>
<td>0.793</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.781</td>
<td>C</td>
<td>0.799</td>
</tr>
<tr>
<td>9.</td>
<td>Carbon Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.620</td>
<td>B</td>
<td>0.625</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.775</td>
<td>C</td>
<td>0.784</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.799</td>
<td>C</td>
<td>0.813</td>
</tr>
<tr>
<td>10.</td>
<td>Las Flores Canyon Rd. &amp; Pacific Coast Hwy.</td>
<td>Weekday AM</td>
<td>0.664</td>
<td>B</td>
<td>0.667</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>0.824</td>
<td>D</td>
<td>0.832</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>0.824</td>
<td>D</td>
<td>0.835</td>
</tr>
</tbody>
</table>

Note: All-Way Stop Control Delay in Seconds Per Vehicle; * Denotes significant traffic impact.
Source: Overland Traffic Consultants, January 2015

Recent 24-hour traffic counts on the study street segments were conducted (Thursday, July 12, 2012 and on Saturday July 14, 2012) to determine the amount of existing traffic currently utilizing the roadways. The traffic volume growth on the street segments was calculated using the same procedures as the study intersections, i.e., ambient growth and related project traffic volume.
Future (2030) Traffic Volume Without Project – Weekday AM Peak Hour

**FIGURE 3.13-20**

**KANAN DUIME ROAD & PACIFIC COAST HIGHWAY (SR 1)**

**MALIBU CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)**

**MALIBU CANYON ROAD & CIVIC CENTER WAY**

**CIVIC CENTER WAY & WEBB WAY / STUART RANCH ROAD**

**CIVIC CENTER WAY & CROSS CREEK ROAD**

**WEBB WAY & PACIFIC COAST HIGHWAY (SR 1)**

**CROSS CREEK ROAD & PACIFIC COAST HIGHWAY (SR 1)**

**MALIBU PIER SIGNAL & PACIFIC COAST HIGHWAY (SR 1)**

**CARBON CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)**

**LAS FLORES CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)**

**WEST STUDY AREA**

**CIVIC CENTER STUDY AREA**

**EAST STUDY AREA**

**SOURCE:** Overland Traffic Consultants, Inc., July 2013
FIGURE 3.13-22

Future (2030) Traffic Volume Without Project – Saturday Mid-Day Peak Hour

KANAN DUIME ROAD & PACIFIC COAST HIGHWAY (SR 1)
MALIBU CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)
MALIBU CANYON ROAD & CIVIC CENTER WAY
CIVIC CENTER WAY & WEBB WAY / STUART RANCH ROAD
CIVIC CENTER WAY & CROSS CREEK ROAD
WEBB WAY & PACIFIC COAST HIGHWAY (SR 1)
CROSS CREEK ROAD & PACIFIC COAST HIGHWAY (SR 1)
MALIBU PIER SIGNAL & PACIFIC COAST HIGHWAY (SR 1)
CARBON CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)
LAS FLORES CANYON ROAD & PACIFIC COAST HIGHWAY (SR 1)

WEST STUDY AREA
CIVIC CENTER STUDY AREA
EAST STUDY AREA

FIGURE 3.13-23

Future (2030) Traffic Volume + Project – Weekday AM Peak Hour


WEST STUDY AREA
CIVIC CENTER STUDY AREA
EAST STUDY AREA
Future (2030) Traffic Volume + Project – Weekday PM Peak Hour

FIGURE 3.13-24

[Map and diagrams showing traffic volume data for various roads in Malibu, California, with the source noted as Overland Traffic Consultants, Inc., July 2013.]
Future (2030) Traffic Volume + Project – Saturday Mid-Day Peak Hour

FIGURE 3.13-25

As shown in Table 3.13-9, the project added traffic generated by the proposed project would not exceed the arterial traffic impact significance thresholds of 0.05 at any study area street segments.

The project’s transit trip generation has also been calculated pursuant to the CMP. As set forth in the CMP, the estimated transit trips generated by the project during the peak hours can be calculated by multiplying the total peak hour vehicle trips by 1.4 to convert vehicle trips to person trips. A second calculation converts the person trips to transit trips by multiplying the person trips by 3.5 percent. The transit trip calculations are as follows:

- **Weekday AM Peak Hour Transit Trips** = 5 transit trips (101 * 1.4 * 0.035);
- **Weekday PM Peak Hour Transit Trips** = 8 transit trips (154 * 1.4 * 0.035); and
- **Saturday Mid-day Peak Hour Transit Trips** = 11 transit trips (226 * 1.4 * 0.035)

Metro transit service is provided by three eastbound and seven westbound buses during the morning peak hours, five eastbound and three westbound buses during the afternoon peak hours, with three buses in each direction during the mid-day peak hours on Saturdays. Thus given the low number of project-generated transit trips per bus, no impacts on the existing or future transit services are expected to occur as a result of the proposed project.

**Analysis of Future Driveway Capacity**

An additional capacity analysis has been conducted at the two proposed shopping center driveways. The same HCM procedures for calculating intersection vehicle delays have been used to calculate the expected vehicle delays at the project serving driveways. Using the estimated driveway volumes and the future traffic volume forecasts for the adjacent streets, an analysis of the operating conditions at the project driveways has been conducted.

The driveway capacity analysis indicates that the project’s main driveway on Civic Center Way will operate at LOS B for all study periods, as shown in Table 3.13-10. Furthermore, the project’s secondary driveway located on Cross Creek Road will operate at LOS A for all study periods.

The driveway capacity analysis indicates that vehicle queuing for left-turns entering or exiting the site will not create any traffic impacts on-site or any significant on-street conflicts with non-project traffic volume (such as the neighboring Country Mart driveway opposite the project’s Civic Center Way driveway).
Table 3.13-10
Future Driveway Traffic Conditions With Project

<table>
<thead>
<tr>
<th>No.</th>
<th>Driveway Location</th>
<th>Peak Hour</th>
<th>2012</th>
<th></th>
<th>2017</th>
<th></th>
<th>2030</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Delay</td>
<td>LOS</td>
<td>Delay</td>
<td>LOS</td>
<td>Delay</td>
<td>LOS</td>
</tr>
<tr>
<td>1.</td>
<td>Plaza Driveway &amp; Civic Center Way</td>
<td>Weekday AM</td>
<td>9.4</td>
<td>B</td>
<td>10.2</td>
<td>B</td>
<td>10.3</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>10.5</td>
<td>B</td>
<td>12.0</td>
<td>B</td>
<td>11.7</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>11.0</td>
<td>B</td>
<td>12.7</td>
<td>B</td>
<td>12.9</td>
<td>B</td>
</tr>
<tr>
<td>2.</td>
<td>Plaza Driveway &amp; Cross Creek Road</td>
<td>Weekday AM</td>
<td>8.6</td>
<td>A</td>
<td>8.7</td>
<td>A</td>
<td>8.7</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Weekday PM</td>
<td>8.9</td>
<td>A</td>
<td>8.9</td>
<td>A</td>
<td>8.9</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Saturday Mid-day</td>
<td>8.7</td>
<td>A</td>
<td>8.7</td>
<td>A</td>
<td>8.7</td>
<td>A</td>
</tr>
</tbody>
</table>

Source: Overland Traffic Consultants, January 2015

Mitigation Measure

Mitigation Measure 3.13.2 would reduce impacts at the intersection of Malibu Canyon Road and Pacific Coast Highway.

Residual Impact

Impacts would be less than significant.

Threshold 3.13-3 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.

The proposed project is not located within an airport land use zone and there are no airports located within the City of Malibu. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation measures are necessary.

Residual Impacts

Less than significant.
Threshold 3.13-4 Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Threshold 3.13-5 Result in inadequate emergency access.

The proposed project does not include any sharp curves or dangerous intersections. Uses on the site would generally consist of commercial/retail uses, including the Whole Foods market and similar restaurant uses. These uses would be compatible with other uses on the site and in the surrounding area. Emergency access would be provided in accordance with County requirements. A fire lane would be provided along the perimeter of the site, including behind the Whole Foods market. A secondary access would be provided on Cross Creek Road to facilitate emergency/fire service access if needed. Therefore, impacts related to inadequate emergency access and hazardous design features would be less than significant.

**Mitigation Measures**

Impacts would be less than significant. No mitigation measures are necessary.

**Residual Impacts**

Less than significant.
**Table 3.13-11**  
Arterial Street Segment Traffic Impact Analysis

<table>
<thead>
<tr>
<th>No.</th>
<th>Street Segment</th>
<th>Capacity</th>
<th>Peak Hour</th>
<th>Volume</th>
<th>V/C</th>
<th>LOS</th>
<th>Percent Increase</th>
<th>Future 2017 Condition</th>
<th>V/C</th>
<th>LOS</th>
<th>Percent Increase</th>
<th>Future 2030 Condition</th>
<th>V/C</th>
<th>LOS</th>
<th>Percent Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Pacific Coast Highway</td>
<td>3,100</td>
<td>AM (7-9)</td>
<td>2,840</td>
<td>0.92</td>
<td>E</td>
<td>50</td>
<td>1.8%</td>
<td>3,344</td>
<td>1.08</td>
<td>F</td>
<td>1.5%</td>
<td>3,381</td>
<td>1.09</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>East of Cross Creek Road</td>
<td></td>
<td>PM (4-6)</td>
<td>3,721</td>
<td>1.20</td>
<td>F</td>
<td>76</td>
<td>2.0%</td>
<td>4,506</td>
<td>1.45</td>
<td>F</td>
<td>1.7%</td>
<td>4,553</td>
<td>1.47</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>Four Lane Divided</td>
<td></td>
<td>Sat. (11-1)</td>
<td>3,552</td>
<td>1.15</td>
<td>F</td>
<td>113</td>
<td>3.2%</td>
<td>4,401</td>
<td>1.42</td>
<td>F</td>
<td>2.6%</td>
<td>4,446</td>
<td>1.43</td>
<td>F</td>
</tr>
<tr>
<td>2</td>
<td>Pacific Coast Highway</td>
<td>3,100</td>
<td>AM (7-9)</td>
<td>1,897</td>
<td>0.61</td>
<td>B</td>
<td>33</td>
<td>1.7%</td>
<td>2,284</td>
<td>0.74</td>
<td>C</td>
<td>1.4%</td>
<td>2,308</td>
<td>0.74</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>West of Malibu Canyon Road</td>
<td></td>
<td>PM (4-6)</td>
<td>2,888</td>
<td>0.93</td>
<td>E</td>
<td>50</td>
<td>1.7%</td>
<td>3,561</td>
<td>1.15</td>
<td>F</td>
<td>1.4%</td>
<td>3,598</td>
<td>1.16</td>
<td>F</td>
</tr>
<tr>
<td></td>
<td>Four Lane Divided</td>
<td></td>
<td>Sat. (11-1)</td>
<td>3,274</td>
<td>1.06</td>
<td>F</td>
<td>74</td>
<td>2.3%</td>
<td>4,034</td>
<td>1.30</td>
<td>F</td>
<td>1.8%</td>
<td>4,076</td>
<td>1.31</td>
<td>F</td>
</tr>
<tr>
<td>3</td>
<td>Malibu Canyon Road</td>
<td>2,800</td>
<td>AM (7-9)</td>
<td>1,820</td>
<td>0.65</td>
<td>B</td>
<td>15</td>
<td>0.8%</td>
<td>2,042</td>
<td>0.73</td>
<td>C</td>
<td>0.7%</td>
<td>2,065</td>
<td>0.74</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>North of Civic Center Way</td>
<td></td>
<td>PM (4-6)</td>
<td>2,071</td>
<td>0.83</td>
<td>D</td>
<td>24</td>
<td>1.2%</td>
<td>2,377</td>
<td>0.95</td>
<td>E</td>
<td>1.0%</td>
<td>2,403</td>
<td>0.96</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td>Two Lane Undivided (1,400 vpvpl)</td>
<td>2,650</td>
<td>Sat. (11-1)</td>
<td>1,529</td>
<td>0.58</td>
<td>A</td>
<td>34</td>
<td>2.2%</td>
<td>1,825</td>
<td>0.69</td>
<td>B</td>
<td>1.9%</td>
<td>1,845</td>
<td>0.70</td>
<td>C</td>
</tr>
</tbody>
</table>

*Source: Overland Traffic Consultants, January 2015*
Threshold 3.13-6 Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Metro route 534 operates along Civic Center Way adjacent to the project site. Metro weekday service on this route is provided by three eastbound and seven westbound buses during the morning peak hours, five eastbound and three westbound buses during the afternoon peak hours, with three buses in each direction during the Saturday mid-day peak hours. As discussed above, given the low number of project-generated transit trips per bus, no impacts on the existing or future transit services are expected to occur as a result of the proposed project.

The proposed project would facilitate alternative transportation by providing 16 bike racks, four golf carts, and two electric vehicle charging stations. Pedestrian movement on the site would be facilitated by interior walkways as well as a pedestrian connection to the adjacent La Paz project. Therefore, impacts related to bicycle and pedestrian facilities would be less than significant.

Mitigation Measures

Impacts would be less than significant. No mitigation measures are necessary.

Residual Impacts

Less than significant.

Cumulative Impacts

The analysis of traffic impacts considers the effects of both background growth in the region as well as the project growth with respect to related projects in the area. Consequently, impacts of cumulative growth are already incorporated into the traffic model. Using criteria adopted by the City of Malibu, it the change in traffic flow generated by the proposed project would exceed the significant traffic impact criteria in the two future cumulative condition at three intersections. The significant traffic impacts occur as follows:

1. The intersection of Pacific Coast Highway and Malibu Canyon Road (study intersection #2) is significantly impacted during the Saturday mid-day peak hour;

2. The intersection of Pacific Coast Highway and Webb Way (study intersection # 6) is significantly impacted during the Saturday mid-day peak hour; and
3. The intersection of Pacific Coast Highway and Cross Creek Road (study intersection #7) is significantly impacted during the weekday afternoon peak hour and during the Saturday mid-day peak hour.

Cumulative impacts to traffic around the project area, including both the proposed project and related projects, are expected to be significant at three of the 10 intersections analyzed prior to mitigation measure implementation. Mitigation measures for future projects which contribute to cumulative traffic growth at the study intersections shall be implemented by all related projects in coordination with the appropriate agency.

**Mitigation Measures**

**Mitigation Measures 3.13-1 and 3.13-2** would reduce the project’s contribution to this cumulative impact.

**Residual Impacts**

With mitigation the project’s contribution would not be cumulatively considerable.