

# IV. Environmental Impact Analysis

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## K. Transportation

### 1. Introduction

The purpose of this section is to address potential transportation and circulation impacts resulting from the Project. This section summarizes the *Traffic Impact Study for the 676 Mateo Street Project* (Traffic Study), prepared by Linscott, Law & Greenspan, Engineers, July 7, 2020. This report is included as **Appendix L.1** of this Draft EIR.

The Traffic Study's base assumptions and technical methodologies (i.e., trip generation, study locations, analysis methodology, etc.) were identified as part of the study approach and were outlined in a *Memorandum of Understanding* (MOU) dated December 2019, which was reviewed and approved by the City of Los Angeles Department of Transportation (LADOT). A copy of the signed MOU is provided in **Appendix L.1** of this Draft EIR. Moreover, LADOT issued a Transportation Study Assessment for the Traffic Study on October 19, 2020, approving the Traffic Study. A copy of the LADOT assessment is included as **Appendix L.2** of this Draft EIR.

The new *State CEQA Guidelines* for evaluating transportation impacts no longer focus on measuring automobile delay and level of service (LOS). State of California Senate Bill 743 (SB 743) directed lead agencies to revise transportation assessment guidelines to include a transportation performance metric that promotes: the reduction of greenhouse gas emissions, the development of multimodal networks, and access to diverse land uses. By state law, SB 743 must be adopted by the local agencies by July 2020.

The traffic analysis follows the City's transportation assessment guidelines (TAG).<sup>1</sup> The City's TAG are focused on transportation metrics that promote: the reduction of greenhouse gas emissions, the development of multimodal networks and access to diverse land uses, as well as safety, sustainability and smart growth. In compliance with the CEQA, this transportation assessment presents (i) a CEQA assessment of Project-related VMT, (ii) a CEQA assessment of whether the Project conflicts or is inconsistent with local plans and policies, and (vi) recommendations for mitigation and improvement measures, where necessary. The TAG also requires assessment of "non-CEQA" transportation issues, which include: 1) pedestrian, bicycle, and transit access; 2) project access, safety, and circulation; 3) construction traffic; and 4) residential street cut-through

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<sup>1</sup> *Transportation Assessment Guidelines, City of Los Angeles Department of Transportation, July 2019.*

analysis. The analyses of these “non-CEQA” issues are included in the Transportation Assessment (TA) found in **Appendix L.1** of this Draft EIR, since they are non-CEQA items, they are not analyzed in this Draft EIR. In addition, analysis of intersection levels of service, freeway conditions, and roadway conditions during special events, are included as appendices to the TA for informational purposes only, and are similarly non-CEQA issues.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) Regional Plans and Regulations

##### (a) *California Department of Transportation*

The California Department of Transportation (Caltrans) directly manages more than 50,000 lane miles of state and federal highways, as well as over 12,000 highway bridges; permits more than 400 public-use airports; and operates three of the top five Amtrak intercity rail services.<sup>2</sup> Pursuant to Section 21092.4 of the Public Resources Code (PRC), for projects of statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities within their jurisdictions that could be affected by a project.

Senate Bill (SB) 743, effective January 2014, requires the Governor’s Office of Planning and Research (OPR) to revise the *State CEQA Guidelines* regarding the analysis of transportation impacts in transit priority areas. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of VMT, reduction of greenhouse gas emissions (GHG), creation of multimodal networks, and promotion of mixed-use developments.

Pursuant to SB 743, the Project Site is located within a Transit Priority Area (TPA) (see also City Zoning Information File No. 2452). A TPA is defined to be an area within one-half mile of a major transit stop that is existing or planned. PRC Section 21064.3 defines a “major transit stop” as a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with frequency of service internal of 15 minutes or less during the morning and afternoon peak commute periods. In addition to addressing how transportation impacts are evaluated under CEQA, SB 743 limits the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099(d)(1) of the PRC states that a project’s aesthetic and parking impacts shall not be considered a significant impact on the

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<sup>2</sup> *Caltrans Strategic Management Plan, 2015-2020.*

environment if (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a TPA.

(b) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*

On April 7, 2016, the SCAG Regional Council adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS): Towards a Sustainable Future*.<sup>3</sup> The 2016-2040 RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. For the first time, SCAG has integrated land use, housing, and environmental strategies with transportation planning to help meet emissions reduction targets set by the California Air Resources Board (CARB), as required by SB 375. The 2016-2040 RTP/SCS provides an alternative to "business as usual" development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by state and federal agencies in April 2016, the 2016-2040 RTP/SCS includes approximately \$556.5 billion in projected funding for transportation projects for Los Angeles County.

The 2016-2040 RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region's needs through 2040. The 2016-2040 RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2016-2040 RTP/SCS is guided by and incorporates all projects from Metro's own Long-Range Transportation Plan. The 2016-2040 RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects.

On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. The 2020-2045 RTP/SCS is currently pending certification by the California Air Resources Board (CARB). Similar to the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses, builds upon and expands previous SCAG RTP/SCS plans' land use and transportation strategies to improve mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a five percent decrease in daily miles driven per capita from 2016 to 2045. Additional information regarding Project compliance with the RTP/SCS can be found in **Section IV.G, Land Use and Planning**, of this Draft EIR.

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<sup>3</sup> *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future.*

(c) *Congestion Management Program*

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.

(2) Local Plans and Regulations

(a) *City of Los Angeles General Plan*

State law requires that every city and county prepare and adopt a long-range comprehensive general plan to guide future development and to identify the community's environmental, social, and economic goals. The City's General Plan (General Plan) addresses community development goals and policies relative to the distribution of public and private land use. The General Plan integrates the citywide elements and 35 Community Plans, and gives policy direction to the City's planning, regulatory, and implementation programs.

The General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City and defines citywide policies regarding land use. The goals, objectives, policies, and related implementation programs of the Framework Element's Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. The Transportation Element has recently been significantly updated to incorporate the City's high-level mobility priorities as the Mobility Plan 2035. Project compliance with each of the Framework chapters can be found in **Section IV.G, Land Use and Planning**, of this Draft EIR and **Table IV.G-3, Project Consistency with the Applicable Objectives and Policies of the General Plan Framework Element**, found in **Appendix H** of this Draft EIR.

*(i) Mobility Plan 2035*

Mobility Plan 2035 was initially adopted on August 11, 2015, as an update to the Transportation Element, and was revised on September 7, 2016.<sup>4</sup> Mobility Plan 2035 includes five main goals that define the City’s high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals.

Mobility Plan 2035 incorporates “Complete Streets” principles and lays the policy foundation for how City residents interact with their streets. In 2008, the California State Legislature adopted AB 1358, The Complete Streets Act, which requires local jurisdictions to, “plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context.”

The Mobility Plan 2035 is both a working guide and a reference document that serves as guiding tool for making sound transportation decisions as the City matures and evolves. It is intended to help the City and other agencies contemplate future actions such as transportation infrastructure improvements or open street events.

The 2010 Bicycle Plan, which is part of the Mobility Plan 2035, guides the development of a Citywide bicycle transportation system and establishes standards for development of these facilities, as well as criteria for prioritization of development of designated routes. With a stated policy to reduce automobile trips and GHG emissions by making five percent of all daily trips and three percent of commute trips bicycle trips by 2020, the 2010 Bicycle Plan establishes a Backbone Bikeway Network and Neighborhood Bikeway Network linking Regional Centers to promote bicycle usage.

*(a) Mobility Hubs Reader’s Guide*

The Mobility Hubs Reader’s Guide, was prepared to provide guidance for enhancing project developments and public right-of-way improvements in proximity to existing or new transit stations with amenities, activities, and programs to support multi-modal connectivity and access.<sup>5</sup> The Mobility Hub program is an extension of the Mobility Plan

<sup>4</sup> City of Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan, adopted by the City Council August 11, 2016 and re-adopted September 7, 2016.*

<sup>5</sup> City of Los Angeles Department of City Planning, *Mobility Hubs: A Reader’s Guide, 2016.*

2035 and encourages bikeability, walkability, rideshare programs, electric vehicle use, enhancing pedestrian connections, and encouraging bus ridership.

(b) *Vision Zero Action Plan and Vision Zero Corridor Plan*

Vision Zero Los Angeles is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death through implementation of different programs including the creation of a Pedestrian Advisory Committee to implement Pedestrian Safety Action Plan throughout the City. Mayor Eric Garcetti issued Executive Directive No. 10 in August 2015, formally launching the Vision Zero initiative in Los Angeles. Vision Zero is also a stated safety objective in the Mobility Plan 2035, which sets the goal of zero traffic deaths by 2035. Jointly directed by LADOT and the LAPD, Vision Zero takes a multi-disciplinary approach to identifying safety risk factors and implementing solutions on a citywide scale. Using a methodology originally developed by the San Francisco Public Health Department, the Vision Zero Task Force has identified streets where investments in safety will have the most impact in reducing severe injuries and traffic fatalities in the City. These roads are collectively known as the High Injury Network (HIN). The HIN will be reviewed by the LADOT's Vision Zero group for potential engineering re-design as well as educational and enforcement campaigns.

(b) *Department of City Planning Walkability Checklist*

The essential purpose of the Walkability Checklist is to guide Department of City Planning staff in working with developers to make developments more “walkable” by way of enhancing pedestrian activity, access, comfort, and safety.<sup>6</sup> In addition, the Walkability Checklist encourages planners and developers to protect neighborhood character and pursue high-quality urban form. Project compliance with the Walkability Checklist can be found in **Section IV.G, Land Use and Planning**, of this Draft EIR.

(c) *Citywide Design Guidelines*

The Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character while promoting design excellence and creative infill development solutions. Per the Citywide Design Guidelines, in instances where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter, a specific plan, or a community-specific guideline such as the Downtown Design Guide, the community-specific requirements prevail.<sup>7</sup> The applicable standards and a consistency analysis of the Citywide Design Guidelines are

<sup>6</sup> *City of Los Angeles Department of City Planning, Walkability Checklist Guidance for Entitlement Review, November 2008.*

<sup>7</sup> *City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed Use Projects, Checklist for Project Submittal.*

discussed in **Section IV.G, Land Use and Planning**, of this Draft EIR, and **Table IV.G-9, Consistency with Applicable Standards and Guidelines of the Citywide Design Guidelines**, found in **Appendix H** of this Draft EIR.

(d) *Downtown Design Guide, Urban Design Standards and Guidelines*

On April 24, 2009, the Los Angeles City Council approved a General Plan Amendment to the Central City Community Plan to revise Chapter V of the Central City Community Plan text to incorporate the *Downtown Design Guide, Urban Design Standards and Guidelines* (Downtown Design Guide).<sup>8</sup> The Downtown Design Guide includes both standards (requirements) and guidelines (suggestions). Projects must comply with standards and are strongly encouraged to comply with guidelines. The Downtown Design Guide implements streetscape and landscape criteria, and defines criteria for building massing, street wall, ground floor treatment, setbacks and sidewalks, parking and access, on-site open space, architectural detail, and signage. The applicable standards and a consistency analysis of the Citywide Design Guidelines are discussed in **Section IV.G, Land Use and Planning**, of this Draft EIR, and **Table IV.G-10, Consistency with Applicable Standards and Guidelines of the Downtown Design**, found in **Appendix H** of this Draft EIR.

(e) *LADOT Transportation Impact Study Guidelines and Transportation Assessment Guidelines*

On July 30, 2019, the LADOT TIS Guidelines were updated to the City's travel demand model and transportation impact thresholds based on VMT, pursuant to *State CEQA Guidelines* Section 15064.3, of the 2019 CEQA Updates that implement SB 743. The City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including the 2025 Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site

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<sup>8</sup> *City of Los Angeles Department of City Planning, Downtown Design Guidelines, June 15, 2009.*

improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.

In July 2020, LADOT published an update to the TAG. Similar to the July 2019 TAG, the newly revised TAG creates a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. In July 2020 version, the City updated its Travel Demand Forecasting (TDF) Model and transportation impact thresholds to be consistent with the vehicle miles traveled (VMT) impact methodology. This updated version of the City's TAG, further refines and clarifies analysis methodologies that were introduced in the last update in July 2019.

## **b) Existing Conditions**

### **(1) Existing Street System**

#### *(a) Regional Highway System*

Regional access to the Project Site is provided by the I-10 (Santa Monica) Freeway located approximately half a mile south of the Project Site, the US-101 (Hollywood) Freeway located approximately 1.2 miles north of the Project Site, and the I-5 (Santa Ana) Freeway located approximately half a mile east of the Project Site. The following is a brief description of these freeways:

I-10 (Santa Monica) Freeway – The I-10 (Santa Monica) Freeway is an east-west freeway connecting the City of Santa Monica with the City of Los Angeles and the municipalities of the San Gabriel Valley and San Bernardino County to the east. In the Project Study Area, four to five mixed-flow freeway lanes are generally provided in each direction on the I-10 Freeway with auxiliary merge/weave lanes provided between some interchanges. Eastbound and westbound ramps are provided at Santa Fe Avenue on the I-10 Freeway in the Project area, which are located approximately 0.6 miles south of the Project Site.

US-101 (Hollywood) Freeway – The US-101 (Hollywood) Freeway is a north-south freeway connecting Downtown Los Angeles to the San Fernando Valley within the City of Los Angeles region. In the Project Study Area, three mixed-flow freeway lanes are generally provided in each direction on the US-101 Freeway with auxiliary merge/weave lanes provided between some interchanges. Northbound and southbound ramps are provided at 4th Street on the U.S. 101 Freeway in the Project vicinity, which are located approximately 0.75 miles northeast of the Project Site, and at 7<sup>th</sup> Street, which is located approximately 0.6 miles southeast of the Project Site.

I-5 (Santa Ana) Freeway – The I-5 (Santa Ana) Freeway is a north-south freeway that extends across northern and southern California. In the Project Study Area, five mixed-

flow freeway lanes are generally provided in each direction on the I-5 Freeway with auxiliary merge/weave lanes provided between some interchanges. Northbound and southbound ramps are generally provided at 4th Street on the I-5 Freeway in the Project vicinity, which are located approximately 1.0-mile northeast of the Project Site, and at 7<sup>th</sup> Street, which are located approximately 0.8 miles southeast of the Project Site.

(b) *Roadway Descriptions*

A brief description of the important roadways in the Project Study Area is provided in the following paragraphs:

Mateo Street – Mateo Street is a north-south oriented roadway that borders the Project Site to the west. Within the Project Study Area, Mateo Street is designated as an Avenue III by the City. One through travel lane is generally provided in each direction on Mateo Street within the Project study area. There is no speed limit posted on Mateo Street in the Project Study Area, thus a prima facie speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code. Mateo Street is also classified as part of the Neighborhood Network (i.e., a network of local streets comfortable for bicycling) and future Tier 2 Bicycle Lanes.

Imperial Street – Imperial Street is a north-south oriented roadway that borders the Project Site to the east. Within the Project Study Area, Imperial Street is designated as a Collector Street by the City. One through travel lane is generally provided in both directions on Imperial Street within the Project Study Area. There is no speed limit posted on Imperial Street in the Project Study Area, thus a prima facie speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code.

Jesse Street - Jesse Street is an east-west oriented roadway located north of the Project Site. Within the Project study area, Jesse Street is designate as a Collector Street by the City. One through travel lane is generally provided in each direction on Jesse Street within the Project study area. There is no speed limit posted on Jesse Street in the Project Study Area, thus a prima facie speed limit of 25 miles per hour is assumed, consistent with the State of California Vehicle Code.

7<sup>th</sup> Street – 7<sup>th</sup> Street is an east-west oriented roadway that is located south of the Project Site. Within the Project Study Area, 7<sup>th</sup> Street is designated as an Avenue II by the City. Two through travel lanes are generally provided in both directions on 7<sup>th</sup> Street within the Project Study Area. Separate exclusive left-turn lanes are provided on 7<sup>th</sup> Street at major intersections. 7<sup>th</sup> Street is posted for a 25 miles per hour speed limit west of Alameda Street and a 35 miles per hour speed limit east of Alameda Street in the Project Study Area. 7<sup>th</sup> Street is also classified as part of the Bicycle Enhanced Network (i.e., a network of low stress streets comfortable for bicycling) and Tier 2 Protected Bicycle Lanes. It

should be noted, that within Vision Zero,<sup>9</sup> 7<sup>th</sup> Street has been designated as a High Injury Network.

(c) *City of Los Angeles High Injury Network*

As discussed above, Vision Zero<sup>10</sup> is a citywide initiative which prioritizes the safety of pedestrians and bicyclists on public streets, with the understanding that roads which are safe for vulnerable users will be safer for all users, in an effort to eliminate traffic fatalities. Key elements of the policy, such as reducing traffic speeds, are founded on the principles of engineering, education, enforcement, evaluation, and equity.

Roadways in the immediate vicinity of the Project which have been identified on the HIN are noted below:

- 6<sup>th</sup> Street west of Mateo Street
- 7<sup>th</sup> Street west of Mateo Street

If a project results in significant transportation impacts, LADOT's Vision Zero group will review those specific locations and immediate vicinity for potential safety enhancements that are consistent with the City's Vision Zero initiative.

(2) **Public Transit Service**

The Project Site is currently served by many local lines and regional lines via stops within convenient walking distance along 7<sup>th</sup> Street. Public transit service in the immediate Project study area is currently provided by the Los Angeles County Metropolitan Transit Authority (Metro). The bus lines include: Metro Local Lines 18, 53, 60, 62, 66 and Metro Rapid 720 and 760. Additionally, the Project Site is located approximately one mile south of the Metro Gold Line Little Tokyo/Arts District Station. A summary of the existing transit service, including the transit route, destinations, and peak hour headways is presented in **Table IV.K-1, Existing Public Transit Routes**. The existing public transit routes in the Project Site vicinity are illustrated in **Figure IV.K-1, Existing Transit Service Serving the Study Area**. Roadways within the City's Transit Enhanced Network in close proximity to the Project Site and in the surrounding area are shown in Figure 3–6 of the Traffic Study (**Appendix L.1** of this Draft EIR). In addition, the location of bus stops and amenities (e.g., bus benches, shelters, etc.) in the Project study area is displayed in Figure 3–3 of the Traffic Study (**Appendix L.1** of this Draft EIR).

<sup>9</sup> *Vision Zero Los Angeles 2015-2025, August 2015.*

<sup>10</sup> *Vision Zero Los Angeles 2015-2025, August 2015.*

# DOWNTOWN ANGELES

see inset



SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY

★ PROJECT SITE



Source: Linscott, Law & Greenspan, July 2018.

Figure IV.K-1  
Existing Public Transit Routes

**Table IV.K-1  
Existing Public Transit Routes**

Route	Destinations	Roadway(s) Near Site	No. of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro 18	Montebello to Wilshire/Western Station (via 6th Street & Whittier Boulevard)	7 <sup>th</sup> Street	EB WB	6 6	7 9
Metro 53	Downtown LA to Carson (via Central Avenue)	Central Avenue	NB SB	9 5	5 7
Metro 60	Downtown LA to Long Beach (via 8th Street, Pacific Boulevard, and Long Beach Boulevard)	7 <sup>th</sup> Street	NB SB	10 7	9 9
Metro 62	Downtown LA to Hawaiian Gardens (via Telegraph Road)	7 <sup>th</sup> Street	EB WB	2 3	2 4
Metro 66	Montebello to Wilshire Center (via 8th Street & Olympic Boulevard)	Olympic Boulevard	EB WB	7 3	4 6
Metro Rapid 720	Commerce to Santa Monica (via Wilshire Boulevard & Whittier Boulevard)	7 <sup>th</sup> Street	EB WB	2 6	7 4
Metro Rapid 760	Downtown LA to Long Beach Boulevard Station (via Long Beach Boulevard & Pacific Boulevard)	7 <sup>th</sup> Street	NB SB	4 3	4 4
<b>Total</b>				<b>73</b>	<b>81</b>

*Source: Los Angeles County Metropolitan Transportation Authority (Metro) website, 2019.*

Public bus/rail transit service within the Study Area will also be improved with the Metro Regional Connector project, which will be a 1.9-mile underground light-rail system that will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station<sup>11</sup> The Regional Connector will improve access to both local and regional destinations by providing continuous thru service between the Gold, Blue, Expo, Red, and Purple Lines and providing connectors to other rail lines via the 7th St/Metro Center Station. Three new transit stations will be developed in conjunction with the Metro Regional Connector. The Little Tokyo/Arts District Station will be the closest transit station to the Project Site, located approximately 1.3 miles north. Completion and opening of the Metro Regional Connector is planned for the year 2021.

The West Santa Ana Branch Transit Corridor project will also improve transit operations within the Project Study Area.<sup>12</sup> The West Santa Ana Branch Transit Corridor will be a new 19-mile light rail transit line that would connect downtown Los Angeles to southeast

<sup>11</sup> Metro Website, Regional Connector Transit Project, accessed August 14, 2019.

<sup>12</sup> Metro Website, Regional Connector Transit Project, accessed August 14, 2019.

LA County. The transit line is expected to provide a direct connection to the Green Line, Blue Line, and the LA County regional transit network. The West Santa Ana Branch Transit Corridor project is on schedule for environmental clearance by the end of 2020. In addition, LADOT had updated DASH Route A in September 2018 with new DASH stops that would better serve the Arts District area. DASH Route A had previously serviced as far south and east in the Art District to 4<sup>th</sup> Street and Merrick Street, but now has new additional stops that go farther south to Palmetto Street. The stop of Molino Street and Palmetto Street is 0.4 miles north of the Project Site.

FASTLinkDTLA is the recently established Transportation Management Organization (TMO) in Downtown Los Angeles that will improve public transit service in the area.<sup>13</sup> TMOs provide employees, businesses, and visitors of an area with resources to increase the number of trips taken by transit, walking, bicycling, carpooling, and other alternative modes. Similarly, FASTLinkDTLA will educate travelers destined to the area about travel options other than personal vehicles, which include transit, microtransit, vanpools, carsharing, walking and biking to optimize mobility. FASTLinkDTLA will also provide group rate and low-income discount travel passes. In addition, FASTLinkDTLA has developed a rideshare program called FlexLA to provide an affordable microtransit option for travelers when public transit service is less frequent in the evening hours.

### (3) Non-Vehicle Transport System

#### (a) Pedestrian Framework

Public sidewalks and pedestrian facilities are provided on all streets within the Project vicinity. Public sidewalks ranging in width from 8 feet to 12 feet are provided along the Mateo Street and Imperial Street property frontages. Potential pedestrian destinations located within an approximately one-quarter mile radius (i.e., 1,320 feet) from the Project Site are noted in Figure 3-1 of the Traffic Study (**Appendix L.1** of this Draft EIR). Roadways designated by the City as Pedestrian Enhanced Districts (PEDs) in close proximity to the Project Site and in the surrounding area are shown in Figure 3-2 of the Traffic Study (**Appendix L.1** of this Draft EIR).<sup>14</sup> PEDs are established areas where improvements for pedestrians are prioritized relative to other roadway users. Figure 3-3 of the Traffic Study (**Appendix L.1** of this Draft EIR) shows the existing pedestrian and transit facilities in the direct vicinity of the Project Site. The following pedestrian facilities currently are provided in the direct vicinity of the Project Site:

<sup>13</sup> Metro website, FASTLinkDTLA, accessed August 14, 2019.

<sup>14</sup> It should be noted that the Sixth Street Viaduct Project is currently under construction, and is expected to be completed by the end of 2020.

- American With Disabilities Act (ADA) handicap ramps, including some with the yellow truncated domes, are provided at the following intersections located near the Project Site:
  - Mateo Street / Industrial Street
  - Mateo Street / 7<sup>th</sup> Street
  - Imperial Street / Jesse Street
  - Santa Fe Avenue / Jesse Street
  - Santa Fe Avenue / 7<sup>th</sup> Street
- Traditional parallel bar or continental style pedestrian crosswalks with varying widths of between approximately 13 feet to 20 feet are provided at the following intersections located near the Project Site:
  - Mateo Street / 6<sup>th</sup> Street
  - Mateo Street / Industrial Street
  - Santa Fe Avenue / 7<sup>th</sup> Street
- Pedestrian crossing signals and push buttons are presently included as part of the traffic signal controls at the nearby signalized intersections.

*(b) Bicycle Networks*

Bicycle access to the Project Site is facilitated by the City's bicycle roadway network. Existing bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Proposed Bicycle Routes, Bicycle Friendly Streets, etc.) identified in the City's 2010 Bicycle Plan are located within an approximate one-mile radius from the Project Site<sup>15</sup>. It is important to note that the 2010 Bicycle Plan goals and policies have been incorporated into the Mobility Plan 2035 to reflect a commitment to a balanced, multi-modal viewpoint. Roadways within the City's Bicycle Enhanced Network (BEN) (low stress network) in close proximity to the Project Site and in the surrounding area are shown in Figure 3-4 of the Traffic Study (**Appendix L.1** of this Draft EIR). In addition, the location of public bicycle racks and bicycle stations in the Project study area is noted in Figure 3-3 of the Traffic Study (**Appendix L.1** of this Draft EIR).

<sup>15</sup> *City of Los Angeles Mobility Plan 2035 (2015), and City of Los Angeles Bicycle Plan. As noted in the Mobility Plan 2035, the 2010 Bicycle Plan and policies have been folded into the Mobility Plan to reflect a commitment to a balanced, multi-modal viewpoint.*

The federal and state transportation systems recognize three primary bikeway facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). Bicycle Paths (Class I) are exclusive car free facilities that are typically not located within a roadway area. Bicycle Lanes (Class II) are part of the street design that is dedicated only for bicycles and identified by a striped lane separating vehicle lanes from bicycle lanes. Bicycle Routes (Class III) are preferably located on collector and lower volume arterial streets.

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project would have a significant impact if it were to:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or**
- b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b); or**
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or**
- d) Result in inadequate emergency access.**

In July 2019, the City adopted thresholds included in the LADOT TAG. These thresholds are the same as the impact questions included in Appendix G of the *State CEQA Guidelines*. The City's CEQA Transportation Thresholds supersede the guidance and thresholds included in the L.A. CEQA Thresholds Guide. The impact criteria in the TAG is discussed below.

#### (1) LADOT

##### (a) Programs, Plans, and Policies

The TAG specifies that the Mobility Plan 2035 and other relevant City plans and policies, including new and revised plans that may be adopted over time, should be consulted in order to identify potential conflicts with projects and plans in the CEQA review process.

(b) *VMT*

LADOT has identified thresholds for significant VMT impacts for each of the 7 Area Planning Commission (APC) sub-areas. A project's VMT are compared against the City's threshold goals for household VMT per capita and work VMT per employee to evaluate the significance of the VMT increases generated by a project. A development project will have a potential impact if the project would generate VMT exceeding 15% below the existing average VMT for the APC area in which the project is located.

This Project is in the Central APC sub-area which limits daily household VMT per capita to a threshold of 6.0 daily household VMT per capita for the residential component and 7.6 daily work VMT per employee for the commercial component (15% below the existing VMT for the Central APC).

(c) *Geometric Design Feature or Incompatible Use Hazards*

Project access plans should be reviewed for accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant. The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping, or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The project location, or project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

## **b) Methodology**

### **(1) Conflict with Plans, Programs, Ordinances, or Policies**

Impacts related to conflict with an adopted program, policy, plan, or ordinance addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities) are evaluated based on whether the program, plan, ordinance, or policy was adopted to protect the environment and if the conflict would result in an environmental impact. Transportation policies or standards adopted to protect the environment are those that support multi-modal transportation and help to reduce VMT. A project that does not implement a particular program, plan, policy, or ordinance, would not necessarily result in a conflict or an impact. However, a project could result in an environmental impact if the project prevented the City from implementing adopted programs, plans and policies with the goal of supporting multi-modal transportation or reducing VMT.

Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies. This determination may require consultation with the City's Department of City Planning (LADCP) and LADOT.

The methodology for determining project impacts associated with conflicts with plans, programs, ordinances, or policies is defined per the City's TAG as follows:

- A project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. The Project Applicant should review the documents and ordinances identified in the TAG (refer to Table 2.1-1 on pages 9 and 10) for City plans, policies, programs, ordinances, and standards relevant to determining project consistency. A specific list of questions (refer to Table 2.1-2 on pages 12 through 14 of the TAG) shall be answered in order to help guide whether the project conflicts with City circulation system policies. A "yes" or "no" answer to these questions does not determine a conflict. Rather, as indicated in the list of questions (i.e., Table 2.1-2 of the TAG), the Project Applicant shall review relevant policies and programs corresponding to the questions to assess whether the proposed project precludes the City's implementation of any adopted policy and/or program.
- If vacation of a public right-of-way, or relief from a required street dedication is sought as part of a proposed project, an assessment should be made as to whether the right-of-way in question is necessary to serve a long-term mobility need, as defined in the Mobility Plan 2035, transportation specific plan, or other planned improvement in the future.

## (2) Vehicle Miles Traveled Impact Thresholds

Office of Planning and Research (OPR) has found that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA, although CEQA allows lead agencies to set or apply their own significance thresholds. The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019.<sup>16</sup> Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15 percent below the existing average work VMT per employee for the APC area in which it's located.

The City's significance thresholds (i.e., provided on a daily household VMT per capita basis and a daily work VMT per employee basis) for each of the seven (7) APC boundary areas are presented in **Table IV.K-2, City of Los Angeles VMT Impact Criteria**. As the Project Site is located in the Central APC, the VMT impact criteria (i.e., 15% below the APC average) applicable to the Project is 6.0 daily household VMT per capita for the residential component and 7.6 daily work VMT per employee for the commercial component.

<sup>16</sup> As discussed in the regulatory setting above, In July 2020, LADOT updated the TAG. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the TAG update, and therefore the analysis focuses on the Project's consistency with the July 2019 TAG.

**Table IV.K-2  
City of Los Angeles VMT Impact Criteria<sup>1</sup>**

Area Planning Commission (APC)	15% Below APC Criteria <sup>2</sup>	
	Daily Household VMT Per Capita	Daily Work VMT Per Employee
Central	6.0	7.6
East Los Angeles	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South Los Angeles	6.0	11.6
South Valley	9.4	11.6
West Los Angeles	7.4	11.1

<sup>1</sup> Source: City of Los Angeles Draft Transportation Assessment Guidelines, July 2019.

<sup>2</sup> The development project will have a potential impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the APC area in which the project (refer to above [source: Table 2.2-1 of the guidelines]).
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located (refer to above [source: Table 2.2-1 of the guidelines]).
- For retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office project above [source: Table 2.2-1 of the guidelines].

The impact methodology set forth in the TAG for a mixed-use project such as the Project and Flexibility Option is as follows:

- Mixed-Use Projects: The project VMT impact should be considered significant if any one (or all) of the project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Since the Project and Flexibility Option's retail and restaurant components are local-serving and are below 50,000 square feet (i.e., the proposed retail and restaurant space total 23,380 square feet), the retail component is assumed to have a less than significant VMT impact based on the screening criteria contained in the City's TAG.

There is a difference in VMT between the Project and the Flexibility Option, therefore separate VMT calculations and analyses are provided for the impact analysis under this threshold. However, the conclusions regarding the impact analysis, impact significance and mitigation measures presented below are the same and apply to the Project and Flexibility Option.

*(a) VMT Analysis Methodology*

LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work

VMT per employee for developments within City limits. The methodology in determining VMT based on the VMT Calculator is consistent with the TAG.

*(b) Travel Behavior Zone*

The City developed travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network.
2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.
3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets.
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network.

The VMT Calculator determines a project's TBZ based on the latitude and longitude of the project address.

*(c) Mixed-Use Development Methodology*

As detailed in City of Los Angeles VMT Calculator Documentation, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for the project area:

- The project's jobs/housing balance
- Land use density of the project
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size

(d) *Travel Demand Forecasting*

The VMT Calculator determines a project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the project's VMT.

(e) *Population and Employment Assumptions*

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including 2012 Developer Fee Justification Study (Los Angeles Unified School District, 2012), the San Diego Association of Governments Activity Based Model, Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012), the U.S. Department of Energy, and other modeling resources.<sup>17</sup> A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

(f) *Transportation Demand Management Measures*

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of transportation demand management (TDM) strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT Calculator:

1. Parking
2. Transit
3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in

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<sup>17</sup> *The 2018 LAUSD Developer Fee Justification Study and Trip Generation 10<sup>th</sup> Edition are now available, but City's VMT Calculator utilized the editions indicated herein.*

Quantifying Greenhouse Gas Mitigation Measures (California Air Pollution Control Officers Association, 2010).

### (3) Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where Project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result.

### (4) Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping, or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

## c) Project Design Features

The Project would implement the following project design features (PDF) to avoid or minimize adverse construction and operational related impacts. The PDFs would be incorporated into the Project and are considered to be part of the Project for purposes of the impact analysis.

<b>PDF TR-1</b>	Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan would be submitted to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Construction Staging and Traffic Management Plan (CSTMP) would formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CSTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction related project representatives (i.e., construction contractors) whose projects will
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potentially be under construction at around the same time as the Project shall be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CSTMP would include, but not be limited to, the following elements as appropriate:

- Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction worker parking on nearby residential streets shall be prohibited.
- Worker parking shall be provided on-site or in designated off-site public parking areas.
- Temporary traffic control during all construction activities adjacent to public rights-of-way shall be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., shall be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles shall be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists shall be obtained through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools, particularly Metropolitan High School.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
- In the event of a lane or sidewalk closure, traffic and/or pedestrians shall be routed around any such lane or sidewalk closures.

- The locations of the off-site truck staging shall be identified to include, staging in a legal area, and which would detail measures to ensure that trucks use the specified haul route, and do not travel through residential neighborhoods.
- There would be coordination with nearby projects that have potential overlapping construction timeframes, to schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.

### (1) Project and Flexibility Option

**PDF TR-2 Transportation Demand Management Program.** A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program shall include, but shall not be limited to, the following strategies:

Reduced Parking Supply. This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the Los Angeles Municipal Code (LAMC) without consideration of parking reduction mechanisms permitted in the code.

Include Bike Parking per Los Angeles Municipal Code. This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations.

## d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences

exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately. Further, for certain thresholds, the impacts of the Project were addressed in the Initial Study (see **Appendix A.2** of this Draft EIR) and were determined to be less than significant, with no further analysis required. However, since the Flexibility Option was not specifically addressed in the Initial Study, the analysis of the Flexibility Option is presented in this section for those thresholds.

***Threshold a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the consistency of the Project or the Flexibility Option to applicable City plans, programs, ordinances, or policies related to transportation for all travel modes would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

As the Project would generate more than 250 daily trips, involve street dedications (at the discretion of LADOT) and is more than 0.5 acres in total gross area (the three screening criteria identified in the TAG), the following is an analysis of whether the Project would conflict with adopted City plans, programs, ordinances, or policies related to transportation for all travel modes.

**Table IV.K-2, Project Consistency with Plans, Programs, Ordinances, or Policies**, found in **Appendix H** of this Draft EIR, summarizes the City's guiding questions contained in the TAG (TAG Table 2.1-1), the responses applicable to the Project, the relevant and supporting City plans, policies and programs, such as the Mobility Plan 2035 and Vision Zero Plans, as well as the determination of whether or not the Project is consistent with the corresponding City plans, programs, ordinances or policies, such as the LAMC. The Project applicability to plans, policies and programs and a detailed consistency analysis is provided below.

(a) *Mobility Plan 2035*

The Project would be consistent with the relevant polices that support the goals and objectives of the Mobility Plan 2035, as detailed in **Table IV.G-2, Project Consistency with Applicable Policies of the Mobility Plan 2035**, found in **Appendix H** of this Draft EIR. Specifically, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing a construction management plan that would identify the location of any temporary lane and sidewalk closures and provide

for measures to maintain both directions of travel. The Project Site's location in downtown Los Angeles is in close proximity to several bus routes, all of which would provide residents, employees, and guests with various public transportation opportunities that would reduce vehicle miles. In addition, 30 percent of the Project's required parking spaces would be electric-vehicle ready, and ten percent of its required parking spaces would provide chargers for electric vehicles within the parking structure on the Project Site, thereby further reducing consumption of petroleum-based fuels. The Project would provide enhancements to ensure a quality pedestrian environment along Mateo Street and Imperial Street with new and additional street trees and landscaping and sidewalk paving elements. In addition, the Project would contribute to the City's policy to provide safe and convenient bicycle facilities by providing on-site short-term and long-term bicycle spaces. A Metro Bike Share facility located off-site approximately 200 feet south of the Project Site on Imperial Street would not be affected by the Project. Additionally, given the location of the Project Site along and in close proximity to transit, including the Metro Gold Line Little Tokyo/Arts District Station located approximately one mile south, the Project would provide residents, visitors, patrons, and employees convenient access to transit services. Therefore, the Project would not conflict with the applicable policies that support the goals and objectives set forth in the Mobility Plan 2035.

As shown in **Table IV.K-2, Project Consistency with Plans, Programs, Ordinances, or Policies**, found in **Appendix H** of this Draft EIR, the Project would require street dedications to accomplish required rights-of-ways to meet the Mobility Plan 2035. Public sidewalks and pedestrian facilities are provided on all streets within the Project vicinity. A six-foot street dedication is recommended for Mateo Street along the Project Site and a nine-foot street dedication is recommended for Imperial Street along the Project Site for the Project.<sup>18</sup> Therefore, the Project would need to provide street dedications to meet the recommended rights-of-ways to meet the Mobility Plan 2035.

Proposed vehicular access to the Project Site will be provided via one driveway located along the west side of Imperial Street, at the northeast portion of the Project Site (i.e., along the Project Site's easterly frontage). The Project driveway will provide access to the subterranean parking levels of the on-site parking garage. The Project driveway is proposed to accommodate full vehicular access (i.e., left-turn and right-turn ingress and egress turning movements). This would be consistent with the Mobility Plan 2035, which permits one driveway along Imperial Street, a Collector Street. **There would be no vacation of public right-of-way with the Project or the Flexibility Option and in conclusion the Project and the Flexibility Option would not conflict with the**

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<sup>18</sup> *City of Los Angeles, Land Development Group & GIS Division, Bureau of Engineering, Written correspondence with Edmond Yew, May 31, 2018. Refer to **Appendix L.5** of this Draft EIR.*

**applicable policies that support the goals and objectives set forth in the Mobility Plan 2035 and impacts would be less than significant.**

*(i) Mobility Hubs Reader's Guide*

As previously discussed, the Mobility Hubs Reader's Guide, was prepared to provide guidance for enhancing project developments and public right-of-way improvements in proximity to existing or new transit stations with amenities, activities, and programs to support multi-modal connectivity and access. The Project Site's location in downtown Los Angeles is in close proximity to several bus routes, all of which would provide residents, employees, and guests with various public transportation opportunities that would reduce vehicle miles. In addition, 30 percent of the Project's required parking spaces would be electric-vehicle ready, and ten percent of its required parking spaces would provide chargers for electric vehicles within the parking structure on the Project Site. Further, the Project also improves walkability in the immediate vicinity of the Project Site by replacing a warehouse use and surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options. The Project's building frontage would provide a variety of ground floor commercial uses along Mateo Street and Imperial Street. In addition, the publicly accessible pedestrian paseo would provide connectivity between the building's frontages. **Overall, the Project and the Flexibility Option would support the Mobility Hubs Reader's Guide by developing a project that encourages multi-modal connectivity and access.**

*(ii) Vision Zero Action Plan*

As previously discussed, the Mobility Plan 2035 shows that the Project Site is not located on roadways that have been identified by Vision Zero, in the City's HIN, which are streets that have been identified to prioritize the safety of pedestrians and bicyclists, with the understanding that roads which are safe for vulnerable users will be safer for all users, in an effort to eliminate traffic fatalities.

LADOT staff may coordinate internal review with the Vision Zero Programs Bureau to determine if safety-related measures are needed to support safe access to and/or from the development site for vulnerable road users (i.e., pedestrians and bicyclists). LADOT's Vision Zero group would review the nearest HIN designated streets (6<sup>th</sup> Street west of Mateo Street and 7<sup>th</sup> Street west of Mateo Street) for potential safety enhancements the City's Vision Zero initiative. **Therefore, the Project and the Flexibility Option would not conflict with the implementation of Vision Zero.**

*(b) Los Angeles Municipal Code*

The Project would provide short- and long-term bicycle parking in accordance with LAMC Section 12.21.A.16 requirements and would provide 154 bicycle spaces. Twelve short-

term bicycle parking spaces for the commercial uses and 12 short-term spaces for the live/work uses would be located near the northern perimeter on the ground floor of the Project. 12 long-term bicycle parking spaces for the commercial uses and 118 long-term bicycle parking spaces for live/work uses would be located within the first subterranean level of the parking garage.

Consistent with the Bicycle Parking Ordinance requirements, short-term bicycle parking spaces would be provided outside the building close to the Project's entrances, and the long-term bicycle parking would be provided inside the first subterranean level of the parking garage. Residents and visitors arriving by bicycle would have the same access opportunities as pedestrian visitors. Bicyclists would not have to share the same access point with vehicles to park their bicycles. Therefore, the Project and the Flexibility Option would meet the LAMC requirements for long-term and short-term bicycle parking spaces as well as not hamper the implementation of the City's Bicycle Plan.

Furthermore, the Project would not conflict with LAMC Section 12.37, which prevents 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. The Project Site has frontage directly on Mateo Street and Imperial Street, which are designated as an Avenue III and a Collector Street, respectively under the Mobility Plan 2035 Street Standards Plan. However, the Project Site is not zoned for R3 or less restrictive zoning and would therefore not conflict with LAMC Section 12.37.

The Project would comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in LAMC Section 12.26.J). As outlined in more detail under subheading Mitigation Measures **MM TR-1**, a preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this Project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project. **Therefore, the Project and the Flexibility Option would not conflict with applicable City ordinances.**

*(c) Other Programs, Plans, Ordinances, and Policies*

Several other programs, plans, ordinances, and policies that are previously mentioned in the regulatory setting and are applicable to the Project are discussed in more detail in **Section IV.G, Land Use and Planning**, of this Draft EIR. More specifically, the 2016-2040 RTP/SCS, the City of Los Angeles General Plan Framework, the Walkability Checklist, and the Citywide and Downtown Design Guidelines all contain goals and policies applicable to transportation and, in some cases, land use projects. Impacts were determined to be less than significant. **Therefore, the Project or Flexibility Option operation-related traffic would not conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and**

**pedestrian facilities. Project or Flexibility Option operation traffic impacts would be less than significant. No mitigation measures would be required.**

## (2) Mitigation Measures

Under both the Project and the Flexibility Option, impacts related to consistency with adopted City plans, programs, ordinances, and policies would be less than significant; no mitigation measures would be required.

## (3) Level of Significance After Mitigation

Under both the Project and the Flexibility Option, impacts related to consistency with adopted City plans, programs, ordinances, and policies and would be less than significant without mitigation.

### **Threshold b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

Numerical differences exist for this threshold because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately. As discussed in Section IV.K.3.b. Methodology, above, a development project will have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC area in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

## (1) Impact Analysis

### (a) *Project*

The daily vehicle trips and VMT expected to be generated by the Project (i.e., without consideration of the local-serving retail space which as stated above is concluded to have a less than significant VMT impact) were forecast using Version 1.3 of the City's VMT Calculator tool. Copies of the detailed City of Los Angeles VMT Calculator worksheets

for the Project are contained in Appendix D and Appendix E, respectively, of the Traffic Study, which can be found in **Appendix L.1** of this Draft EIR. As indicated in the summary VMT Calculator worksheet, the Project is forecast to generate the following:

- The Project is estimated to generate a total of 2,404 daily vehicle trips.
- The estimated daily household VMT per capita for the Project's residential land use component is 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita.
- The estimated daily work VMT per employee for the Project's commercial land use component is 7.4 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee.

It is noted that the Project would incorporate TDM measures that include reduced parking supply and bicycle parking (refer to PDF TR-2, above).

The household-based and employee-based TDM measures and effectiveness are as follows:

- Reduced parking supply: 13% reduction
- Bike parking per LAMC: 0.6% reduction

The household-based only TDM measures and effectiveness are as follows:

- Reduced parking supply: 13% reduction

The implementation of the TDM measures results in daily household and daily work VMT impacts that are less than significant. **Thus, based on the above analyses, the Project is not expected to result in a significant VMT impact. Therefore, no mitigation is necessary as it relates to VMT.**

*(b) Increased Commercial Flexibility Option*

Under the Flexibility Option, the commercial square footage provided would be increased to 45,873 square feet within the same building parameters and, in turn, there would be a reduction in the overall number of live/work units for a total of 159 units. Overall, the design, configuration, and operation of the Flexibility Option would be comparable to the Project. The Flexibility Option is forecast to generate the following:

- The Flexibility Option is estimated to generate a total of 2,467 daily vehicle trips.

- The estimated daily household VMT per capita for the Flexibility Option's residential land use component is 5.0 daily household VMT per capita, which is less than the Central APC significance threshold of 6.0 VMT per capita.
- The estimated daily work VMT per employee for the Flexibility Option's commercial land use component is 7.6 daily work VMT per employee, which is equal to the Central APC significance threshold of 7.6 VMT per employee.

Similar to the Project, it is noted that the Flexibility Option would incorporate TDM measures as project features, such as reduced parking supply and bicycle parking (refer to PDF TR-3, above).

The household-based and employee-based TDM measures and effectiveness are as follows:

- Reduced parking supply: 13% reduction
- Bike parking per LAMC: 0.6% reduction

The household-based only TDM measures and effectiveness are as follows:

- Reduced parking supply: 13% reduction

The implementation of the TDM measures results in daily household and daily work VMT impacts that are less than significant. **Thus, based on the above analyses, the Flexibility Option is not expected to result in a significant VMT impact. Therefore, no mitigation is necessary as it relates to VMT.**

## (2) Mitigation Measures

Under both the Project and Flexibility Option, impacts would be less than significant with respect to VMT; no mitigation measures would be required.

## (3) Level of Significance After Mitigation

Under both the Project and Flexibility Option, impacts related to VMT would be less than significant without mitigation.

***Threshold c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

## (1) Impact Analysis

### (a) *Project*

As discussed in **Section VII, Effects Found Not to be Significant**, and in the Initial Study (**Appendix A.2**), the Project would not substantially increase hazards due to a design feature or incompatible uses. **Therefore, the Project would have no impact with respect to hazardous design features, and no mitigation measures would be necessary.**

### (b) *Increased Commercial Flexibility Option*

The design, configuration, and operation of the Flexibility Option would be comparable to the Project. Therefore, similar to the Project, the Flexibility Option would not substantially increase hazards due to a design feature or incompatible use. **Therefore, the Flexibility Option would have no impact with respect to hazardous design features, and no mitigation measures would be necessary.**

## (2) Mitigation Measures

Under both the Project and the Flexibility Option, no impact would occur with respect to hazardous geometric design features; no mitigation measures would be required.

## (3) Level of Significance After Mitigation

Under both the Project and the Flexibility Option, no impact would occur with respect to hazardous geometric design features.

### ***Threshold d) Would the project result in inadequate emergency access?***

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option to emergency access would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

## (1) Impact Analysis

### (a) *Construction*

Construction activities have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. These impacts would be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services.
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until the street closure has ended.
- The Project would prepare a Construction Staging and Traffic Management Plan (see PDF TR-1) that would address traffic and access control during construction.

Accordingly, Project construction would not affect emergency access. **Therefore, Project or Flexibility Option construction-related impacts to emergency access would be less than significant and no mitigation measures are required.**

*(b) Operation*

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including Mateo Street and Imperial Street. All circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times.

This increase in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project's proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. **Therefore, Project or Flexibility Option impacts related to emergency access would be less than significant and no mitigation measures are required.**

See also **Section IV.J.1, Public Services-Fire Protection**, of this Draft EIR.

**(2) Mitigation Measures**

Under both the Project and the Flexibility Option, impacts with respect to inadequate emergency access would be less than significant; no mitigation measures are required.

### (3) Level of Significance After Mitigation

Under both the Project and the Flexibility Option, impacts with respect to inadequate emergency access would be less than significant without mitigation.

## 4. Cumulative Impacts

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

### a) Impact Analysis

#### (1) Land Use Consistency

As with the Project, the Related Projects would be required to comply with relevant land use policies and regulations. The Project would generally be consistent with applicable land use plans, ordinances, and zoning standards with approval of the requested approvals, and thus, the Project would not incrementally contribute to cumulative conflicts or inconsistencies with respect to land use consistency. In addition, since the Project does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives, there is no cumulative inconsistency that can be determined.

Although the Project and related projects may intensify use of transit facilities in the Project vicinity, such use is not expected to result in a deficient condition caused by the Project such that it would conflict with transit plans and policies.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, Project impacts would be less than significant with respect to pedestrian and bicycles plans and policies. Similar to the Project, the related projects would be required to provide short-term and long-term bicycle parking in accordance with LAMC Section 12.21-A,16(a). Furthermore, related project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. Therefore, the Project and related projects would not result in a significant cumulative impact with respect to transit, pedestrian, and bicycle facilities.

**Thus, Project and Flexibility Option impacts with regard to conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit,**

**roadway, bicycle, and pedestrian facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## (2) Vehicle Miles Traveled Analysis

As stated in the City's TAG document (refer to page 20 of the TAG), analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the detailed project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets.<sup>19</sup> As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the 2016-2040 RTP/SCS does not specify any development may indicate a significant impact on transportation. As previously discussed, the Project would result in daily household and daily work VMT impacts that are less than significant.

**Based on the above project-related VMT analysis (i.e., which conclude that the Project and Flexibility Option fall under the City's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS), no cumulative VMT impacts are anticipated. Therefore, the Project and Flexibility Option's cumulative VMT impact would be less than significant.**

## (3) Hazardous Geometric Design Features

The Project would not result in a significant impact with regards to hazards due to a design feature or incompatible uses. Each of the Related Projects would be reviewed by the City to ensure provision of safe access for vehicles, pedestrian, and bicyclists. Similar to the Project, the Related Projects would be required to implement standards for adequate sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not

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<sup>19</sup> As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS.

expected. **Therefore, cumulative impacts of the Project and Flexibility Option with regards to hazardous geometric design features would be less than significant.**

#### (4) Emergency Access

The Project Site and the surrounding Downtown area are located in an established urban area that is well-served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, pursuant to California Vehicle Code Section 21806, emergency vehicles have priority on streets with sirens, options to avoid traffic with sirens, and drive in opposing traffic lanes.<sup>20</sup> Similar to the Project, related projects would implement Construction Management Plans to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans would ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. Further, similar to the Project, the Related Projects would be reviewed on a project-by-project basis by the LAFD to ensure compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services. Therefore, based on the above, significant cumulative emergency access impacts from the Project and Flexibility Option are not anticipated.

#### b) Mitigation Measures

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; project-related VMT analysis; hazardous geometric design features; and inadequate emergency access would be less than significant and no mitigation measures are required.

#### c) Level of Significance After Mitigation

Cumulative impacts with respect to the consistency with adopted plans, programs, ordinances, and policies; project-related VMT analysis; hazardous geometric design features; and inadequate emergency access would be less than significant.

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<sup>20</sup> *California Vehicle Code, Section 21806.*