

IV. Environmental Impact Analysis

J. Transportation

1. Introduction

This section of the Draft EIR evaluates the potential for implementation of the Prologis Vermont and Redondo Project to result in transportation impacts in the City of Los Angeles. The analysis in this section is based in part on the following technical report:

- Transportation Assessment Report: Prologis Vermont Avenue and Redondo Beach Boulevard Industrial Project (TAR), Linscott, Law & Greenspan Engineers, May 2020.

A level of service (LOS) analysis, which analyzes roadway intersection performance based on the Critical Movement Analysis method, was prepared for informational purposes only. This analysis is included as part of the TAR. A complete copy of this study is provided in Appendix I1 to this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Americans with Disabilities Act of 1990
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743/ CEQA Guidelines Section 15064.3
- SCAG Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS)
- Los Angeles County Congestion Management Program
- City of Los Angeles
 - Mobility Plan 2035
 - Harbor Gateway Community Plan
 - Municipal Code 41.40 and 12.26J
 - Vision Zero
 - CEQA Transportation Thresholds

- Transportation Assessment Guidelines
- LADOT Manual of Policies and Procedures
- Citywide Design Guidelines

(1) Federal

a. *Americans with Disabilities Act (ADA) of 1990*

Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

a. *Assembly Bill 32 (AB 32) and Senate Bill 375 (SB 375).*

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (California ARB) is coordinating the response to comply with AB 32.

On December 11, 2008, California ARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of SB 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

b. California Vehicle Code (CVC)

The CVC provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

c. Senate Bill 743/CEQA Guidelines Section 15064.3

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743 (Steinberg, 2013). Among other things, SB 743 created a process to change the methodology to analyze transportation impacts under CEQA (Public Resources Code [PRC] Section 21000 *et seq.*). On December 30, 2013, the State of California Governor's Office of Planning and Research (OPR) released a preliminary evaluation of alternative methods of transportation analysis, which included analysis based on project vehicle miles traveled (VMT) rather than impacts to intersection LOS. OPR issued other draft discussion documents in March 2015 and January 2016, suggesting some new revisions to the State CEQA Guidelines. In November 2017, OPR submitted the proposed amendments to the CEQA Guidelines to the State's Natural Resources Agency (that include a proposed new Guidelines section 15064.3 which governs how VMT-based analyses of potential traffic impacts should be conducted). On January 26, 2018, the Natural Resources Agency published a Notice of Rulemaking, commencing the formal rulemaking process for the amendments to the CEQA Guidelines. On December 28, 2018, the California Office of Administrative Law adopted the proposed amendments, formally implementing the use of VMT as the metric for transportation analysis under CEQA and providing a grace period allowing local agencies to opt-in to the new metrics. All agencies had until July 1, 2020 to adopt a VMT threshold. Therefore, analysis of the transportation impacts is based on the City's VMT metric.

Caltrans is also pursuing VMT as a metric in determining project impacts, as described in Caltrans' Local Development – Intergovernmental Review Program Interim Guidance document (Revised

November 2016) (LD-IGR Guidance). The LD-IGR Guidance was prepared as a result of recent legislation, planning guidance, and Caltrans' adoption of plans and policies that collectively promote reductions in greenhouse gas (GHG) emissions, good community design, improved proximity to key destinations, and a safe, multimodal transportation system. The LD-IGR Guidance notes that Caltrans is currently creating its Statewide Transportation Analysis Guide (TAG) and updating its Transportation Impact Study Guide (TISG), and that they will focus transportation analysis on VMT impacts and the multimodal transportation networks, but that until the TAG-TISG is complete, the LD-IGR Guidance will remain in effect.

(3) Regional

a. *Southern California Association of Governments' Regional Transportation Plan/Sustainability Communities Strategy*

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020-2045 RTP/SCS). The 2020-2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land uses strategies in development of the SCAG region through horizon year 2045. It projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of 8 percent by 2020 and 19 percent by 2035. Additionally, it is also projected that implementation of the plan would reduce VMT per capita for year 2045 by 4.1 percent compared to baseline condition for the year. Rooted in the 2008 and 2012 RTP/SCs plans, the 2020-2045 RTP/SCS includes "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together, and increasing investments in transit and complete streets.

b. *Los Angeles County Congestion Management Program*

The Los Angeles County Congestion Management Program (CMP) was previously a State-mandated program that was enacted by the California State Legislature with the passage of Proposition 111 in 1990 that primarily utilized a level of service (LOS) performance metric. Senate Bill 743 contains amendments to current congestion management law that allows counties to opt out of the LOS standards that would otherwise apply in areas where CMPs are utilized. Pursuant to California Government Code Section 65088.3, local jurisdictions may opt out of the CMP requirement without penalty if a majority of the local jurisdictions representing a majority of the 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 the 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 the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, a CMP analysis is no longer included in City of Los Angeles environmental documents.

(4) Local

a. *Mobility Plan 2035*¹

In August 2015, the City Council adopted Mobility Plan 2035, which serves as the City's General Plan Circulation Element. The City Council has adopted several amendments to Mobility Plan 2035 since its initial adoption, including the latest amendments on September 7, 2016.² Mobility Plan 2035 identifies five main goals related to circulation and mobility in the City; these goals include: Safety First; World Class Infrastructure; Access for All Angelenos; Collaboration, Communication and Informed Choices; and Clean Environments and Healthy Communities. Each goal has objectives and policies to achieve each goal.

The City's Mobility Plan 2035 identifies a segment of Vermont Avenue in the vicinity of the proposed Project as a Pedestrian Enhanced District, which are targeted areas prioritized for pedestrian enhancements. The Pedestrian Enhanced Districts in the vicinity of the Project Site are illustrated in Figure 3-5 of the TAR (see Appendix I1). Provision of a complete pedestrian network encourages pedestrian activity and walking as a transportation mode. Walkability is a term for the extent to which walking is readily available as a safe, connected, accessible and pleasant mode of transport. There are several criteria that are widely accepted as key aspects of the walkability of urban areas that should be satisfied. The underlying principle is that pedestrians should not be delayed, diverted, or placed in danger. The widely accepted characteristics of walkability are as follows:

- **Connectivity:** People can walk from one place to another without encountering major obstacles, obstructions, or loss of connectivity.
- **Convivial:** Pedestrian routes are friendly and attractive, and are perceived as such by pedestrians.
- **Conspicuous:** Suitable levels of lighting, visibility and surveillance over its entire length, with high quality delineation and signage.
- **Comfortable:** High quality and well-maintained footpaths of suitable widths, attractive landscaping and architecture, shelter and rest spaces, and a suitable allocation of roadspace to pedestrians.

¹ *City of Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan.*

² *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.*

- Convenient: Walking is a realistic travel choice, partly because of the impact of the other criteria set forth above, but also because walking routes are of a suitable length as a result of land use planning with minimal delays.

b. Harbor Gateway Community Plan

The Harbor Gateway Community Plan (Community Plan) was adopted in 1995 and amended in 2016 as part of the Mobility Plan 2035 update. While an updated Community Plan is currently under development, the amended 1995 Community Plan is currently in effect. The Community Plan includes transportation-related objectives, policies, and programs in Chapter III, Land Use Plan Policies and Programs, as well as in Chapter IV, Coordination Opportunities for Public Agencies. These objectives, policies, and programs are focused on facilitating circulation in a way that relieves congestion and provides mobility for all citizens.

c. City of Los Angeles Municipal Code³

(i) Construction Traffic

Los Angeles Municipal Code (LAMC) Section 41.40 limits construction activities to the hours from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. No construction activities are permitted on Sundays.

(ii) Transportation Demand Management (TDM)

LAMC Section 12.26 J, *Transportation Demand Management and Trip Reduction Measures*, applies to non-residential development in excess of 25,000 square feet of gross floor area and provides TDM and trip reduction measures for non-residential development of different sizes, including 25,000 square feet, 50,000 square feet, and 100,000 square feet.

d. Vision Zero

Vision Zero 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.

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 Mobility Plan 2035, which sets the goal of zero traffic deaths by 2025. Jointly directed by LADOT and the Los Angeles Police Department (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

³ *City of Los Angeles. 2020. Municipal Code.*

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. If a project results in significant traffic impacts at intersections located along a designated HIN, 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. Streets surrounding the Project Site have not been identified as HIN.⁴

e. City of Los Angeles CEQA Transportation Thresholds

On July 30, 2019, the City adopted the City of Los Angeles CEQA Transportation Thresholds. The thresholds include using VMT as a criterion to determine transportation impacts, pursuant to SB 743 and the recent changes to CEQA Guidelines Section 15064.3. LADOT revised the City's guidelines for evaluating project-level transportation issues to ensure that proposed development projects would be consistent with City and mobility objectives, including Mobility Plan 2035. LADOT developed the City of Los Angeles VMT Calculator Version 1.3 in May of 2020 to estimate project-specific daily household VMT per capita and daily work VMT per employee for development within City limits.

f. City of Los Angeles Transportation Assessment Guidelines

The Transportation Assessment Guidelines (TAG) establish criteria for project review objectives and requirements, provides instructions and sets standards for preparation of a transportation assessment in the City of Los Angeles. In August 2019, LADOT published an update to the TAG to conform to the requirements of SB 743. The update incorporated updates to the CEQA guidelines proposed by OPR and OPR's corresponding Technical Advisory, and made changes to be consistent with and implement the City of Los Angeles CEQA Thresholds Guide update. The purpose of the TAG is to address safety, sustainability, smart growth, and the reduction of GHG emissions- in addition to traditional mobility considerations for the City of Los Angeles. The TAG was established to effectuate a review process that advances the City's motive of developing a safe, accessible, well-maintained, and well-connected multi modal transportation network. The TAG were revised in July 2020 to further refine and clarify analysis methodologies that were introduced in the August 2019 update.

g. LADOT Manual of Policies and Procedures

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the criteria for review of driveway design, striping, channelization, special signaling, and traffic signal timing and operation.

⁴ *City of Los Angeles.High Injury Network. Accessed on May 20, 2021 at; <https://ladot.maps.arcgis.com/apps/MapJournal/index.html?appid=488062f00db44ef0a29bf481aa337cb3&webmap=6ad51e9cf42c4ef09817e4b3b4d2eeb0>.*

h. Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

b. Existing Conditions

(1) Existing Circulation Network

The Project Site is located within a well-established multi-modal transportation network maintained by the City of Los Angeles, the City of Gardena, and the County of Los Angeles.

a. Roadway Classifications

The City of Los Angeles utilizes five arterial roadway classifications (Boulevard I and II; Avenue I, II, and III) in addition to collector, local, and other roadway types. The City of Gardena utilizes arterial, major collector, collector, and local roadway classifications, while the County of Los Angeles utilizes major highway, secondary highway, limited secondary highway, parkway, and expressway classifications. Descriptions of general roadway categories, including freeway, arterial, collector, and local, are provided in Section 3.1.1 of the TAR (see Appendix I1).

b. Regional and Local Street Systems

Regional vehicular access to the Project Site is primarily provided by I-110 (Harbor Freeway). I-110 interconnects with the regional highway system, which is comprised of the Interstate (I), State Route (SR), and United States (US) highway systems. I-110 is a north-south oriented freeway connecting downtown Los Angeles with the Los Angeles Harbor area, including the Port of Los Angeles. I-110 generally provides four mainline freeway lanes in each direction in the Project vicinity, along with auxiliary lanes to facilitate merging and diverging movements. Within the general Project area, on- and off-ramps are provided at Rosecrans Avenue and Redondo Beach Boulevard. Metro manages the I-110 Freeway ExpressLanes, which are dynamically-priced high-occupancy toll lanes and require the use of a FasTrak Flex transponder. ExpressLanes are provided in each direction in the Project vicinity, with an entrance to the northbound ExpressLanes from the mainline general use lanes provided at Redondo Beach Boulevard.

Immediate vehicular access to the Project Site is provided via Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue. The Project Site is further served by the roadway system surrounding the Project Site. Existing roadway descriptions are provided in Table IV.J-1, below. Carson Street between Western Avenue and Denker Avenue is the only roadway identified as part of the High Injury Network (HIN).

**Table IV.J-1
Roadway Descriptions**

Roadway	Classification [1]	Travel Lanes		Median Types [4]	Speed Limit
		Direction [2]	No. Lanes [3]		
Normandie Avenue	Major Collector [5]	NB-SB	4	N/A	35
Budlong Avenue	Collector [5]	NB-SB	2	N/A	30
Vermont Avenue	Arterial [5]	NB-SB	4 to 6	RMI	40 to 45
	Avenue I [6]	NB-SB	4 to 6 [7]	RMI	40 to 45
Orchard Avenue	Local Street [6]	NB-SB	2	N/A	25
Figueroa Street	Avenue I [6]	NB-SB	4 [8]	2WLT	40
	Major Highway [9]	NB-SB	4 [8]	2WLT	40
Rosecrans Avenue	Arterial [5]	EB-WB	6	RMI	40
	Boulevard II [6]	EB-WB	6	2WLT	40
149th Street	Local Street [5]	EB-WB	2	N/A	25
	Collector [6]	EB-WB	2	N/A	25
Marine Avenue	Collector [6]	EB-WB	2	N/A	30
Redondo Beach Boulevard	Arterial [5]	EB-WB	4 to 6	2WLT/RMI	35
	Boulevard II [6]	EB-WB	5 [10]	2WLT	40
	Major Highway [9]	EB-WB	4	2WLT	40
161st Street	Local Street [5]	EB-WB	2	N/A	30
Alondra Boulevard	Boulevard II [6]	EB-WB	2 to 6	2WLT/RMI	35

Source: Linscott, Law & Greenspan, Engineers 2020.

Notes:

[1] Roadway classifications are from the City of Los Angeles Mobility Plan 2035 (adopted September 7, 2016); City of Gardena General Plan, Circulation Element (adopted April 25, 2006); and Los Angeles County's General Plan (Highway Plan), adopted October 6, 2015.

[2] Direction of roadways in the Project area: NB-SB = northbound and southbound; and EB-WB = eastbound and westbound.

[3] Number of lanes in both directions on the roadway. Variations in number of travel lanes due to time restricted on-street parallel parking are noted below.

[4] Median type of the road: RMI = Raised Median Island; 2WLT = 2-Way Left-Turn Lane; and N/A = Not Applicable.

[5] City of Gardena

[6] City of Los Angeles

[7] Class II Bike Lane - North of Redondo Beach Boulevard

[8] Class II Bike Lane - South of Redondo Beach Boulevard

[9] County of Los Angeles

[10] Tow Away No Stopping 7 AM to 9 AM and 4 PM to 6 PM in the westbound direction.

(2) Transit Service

Public transit service is provided within the Project study area by Metro, the City of Gardena Department of Transportation (Gtrans), and Torrance Transit bus lines. A summary of the existing transit service near the Project Site, including the transit provider, route number, major destinations, and number of buses per peak hour, is presented in Table IV.J-2.

**Table IV.J-2
Existing Transit Routes**

Route	Destination	Roadways Near Site	No. of Buses or Trains during Peak Hour		
			Direction	AM	PM
GTrans Line 1X	Redondo Beach to Downtown Los Angeles via Gardena, Hawthorne and Torrance	Vermont Avenue, Rosecrans Avenue, Redondo Beach Boulevard, 161st Street, Alondra Boulevard	NB	2	2
			SB	2	2
GTrans Line 2	Gardena to Torrance	Vermont Avenue, Rosecrans Avenue, Redondo Beach Boulevard, 161st Street, Alondra Boulevard	NB	4	4
			SB	4	4
GTrans Line 3	Compton to Hawthorne via Gardena	Normandie Avenue, Vermont Avenue, Redondo Beach Boulevard, 161st Street, Alondra Boulevard	EB	4	4
			WB	4	4
GTrans Line 4	Gardena to Hawthorne via Torrance	Normandie Avenue, Redondo Beach Boulevard	EB	1	2
			WB	1	1
Metro 125	El Segundo to Norwalk via Lawndale, Los Angeles, Compton and Downey	Vermont Avenue, Rosecrans Avenue	EB	4	3
			WB	4	3
Torrance Transit 1	Torrance to Los Angeles via Carson, Gardena and Compton	Figueroa Street, Redondo Beach Boulevard	NB	2	2
			SB	3	2
TOTAL				35	33

Source: Linscott, Law & Greenspan, Engineers 2020.

Figure 3-3 in the TAR (Appendix I1) shows the existing public transit routes in the vicinity of the Project Site.

Three transit lines have routes which are directly adjacent to the Project Site. Gtrans Lines 1X, 2, and 3 provide transit service along Vermont Avenue, and each provides a stop at the Vermont Avenue/Redondo Beach Boulevard intersection. As shown in Table J-2, Gtrans Lines 2 and 3 have approximately 15-minute headways during the peak morning and afternoon commute periods (i.e., four buses per hour). Gtrans Line 1X operates with approximately 30-minute headways (i.e., two buses per hour). Based on the existing level of public transit service, Vermont Avenue satisfies the definition of a high-quality transit corridor. The proposed Project is also within a transit priority area within the definition of the PRC Sections 21064.3 and 21099(a)(7). This means that the Project is served by ample public transportation.

Gtrans Lines 1X and 2 northbound buses utilize the existing bus stop located at the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection (i.e., the southwest corner of the Project Site), which currently provides a bus bench. Line 3 westbound buses utilize an existing stop on the northwest corner of the intersection, which currently provides buses for all

three lines (southbound GTrans Line 1X and 2 and eastbound GTrans Line 3) utilize an existing stop on the southwest corner of the intersection, which currently provides a bus bench. The location of the bus stops and amenities (e.g., bus benches, shelters, etc.) are shown in Figure 3-4 of the TAR (included in Appendix I1).

(3) Pedestrian Framework

Pedestrian infrastructure consists of facilities, such as sidewalks, crosswalks, pedestrian signals, curb access ramps, Americans with Disabilities Act (ADA) compliant tactile warning strips, and curb extensions, among other things. These facilities are widely provided within the study area. Pedestrian facilities are provided by the City of Gardena within the study area. Sidewalks are provided along the major corridors within the City, and marked crosswalks, pedestrian signals, and curb ramps are provided at the study intersections, listed in Table 3-1 of the Transportation Assessment Report, included in Appendix I1 of this Draft EIR. Tactile warning strips consisting of yellow truncated dome pads are provided at most curb ramps along the portion of Vermont Avenue under the jurisdiction of the City of Gardena but are not provided at the study intersections along Redondo Beach Boulevard west of Vermont Avenue. Additionally, sidewalks, marked crosswalks, pedestrian signals, and curb ramps with yellow truncated dome pads are provided along the portion of Figueroa Street under the jurisdiction of the County of Los Angeles.

Paved pedestrian sidewalks are provided along both sides of Redondo Beach Boulevard within the City of Los Angeles; however, key facilities are missing from the pedestrian network adjacent to the Project Site. No paved pedestrian sidewalks are provided along the west side of Orchard Avenue, and a segment of the roadway shoulder along Vermont Avenue, while paved, does not provide any formal pedestrian facilities, which are separated (i.e., elevated) from the roadway by curb and gutter. Additionally, neither marked crosswalks nor curb ramps are provided at the northeast and southeast corners of the Vermont Avenue/Redondo Beach Boulevard study intersection or at the unsignalized “T” intersections of Ainsworth Street/Redondo Beach Boulevard and Orchard Ave (East)/Redondo Beach Boulevard in the immediate vicinity of the Project Site. It is noted that marked crosswalks, pedestrian signals, and curb ramps with yellow truncated dome pads are provided at the signalized study intersections of Orchard Avenue/Redondo Beach Boulevard, I-110 Freeway Southbound Ramps/Redondo Beach Boulevard, I-110 Freeway Northbound Ramps/Redondo Beach Boulevard (with the exception of the signalized driveway which represents the north leg of the intersection), and the portion of Figueroa Street/Redondo Beach Boulevard under the City’s jurisdiction. The existing pedestrian facilities within the City of Los Angeles’ jurisdiction are presented in Figure 3-4 of the TAR (see Appendix I1).

(4) Bicycle Framework

Bicycle infrastructure consists of both facilities within the roadway, as well as public bicycle parking spaces. 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.

The City of Los Angeles has designated a network of roadways which prioritize bicycle travel. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths, which provide bicycle facilities for a variety of users in a low-stress environment meant to provide a higher level of comfort than striped bicycle lanes. This network includes bicycle facilities, which are physically separated from other roadway users as well as facilities on neighborhood streets which provide connections within the protected bicycle lane system. The location of roadways in the vicinity of the Project Site, which are designated as part of the Bicycle Enhanced Network, is illustrated in Figure 3-6 of the TAR (see Appendix I1). The Bicycle Lane Network consists of Tier 2 and Tier 3 bicycle lanes. The location of roadways with bicycle lanes identified in the City's Mobility Plan 2035 is presented in Figure 3-7 of the TAR (see Appendix I1). It should be noted that Vermont Avenue, which has been selected for a Tier 1 Protected Bicycle lane, currently accommodates a striped bike lane along the east side of the roadway north of Redondo Beach Boulevard within the City's jurisdiction.

The City of Gardena's General Plan 2006 Circulation Plan also includes a network of designated bicycle routes, which are denoted by signage but no pavement marking. The network is generally located along roadways with lower vehicular volumes and speeds, such as collectors and local streets. The bicycle network maintained by the City of Gardena does not directly connect to the bicycle network provided by the City of Los Angeles. However, a bike lane is provided in the public right-of-way along Vermont Avenue north of Redondo Beach Boulevard, and an existing bus stop is provided adjacent to the Project site.

3. Environmental Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds, a project would have a significant impact related to transportation if the Project would:

Threshold (a): *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Threshold (b): *Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

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

Threshold (d): Result in inadequate emergency access?**b. Methodology****(1) Requirements for Transportation Assessments**

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2019 and were subsequently adopted by the City of Los Angeles on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the *CEQA Transportation Analysis Guidelines 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 Guidelines Update* establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG. The analysis in this section and the Transportation Assessment Report (see Appendix I1 of this Draft EIR) uses the latest version of the TAG updated by LADOT in 2020.

(2) Consistency with Plans, Programs, Ordinances, or Policies

As discussed previously, pursuant to the implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation under CEQA, automobile delay is not considered a potential significant impact. As such, the following analysis does not address the Project's impacts on intersection LOS; however, an LOS analysis was prepared for the Project for informational purposes only and is included as part of the TAR. A complete copy of this study is provided in Appendix I1 to this Draft EIR. Appendix G Threshold (a) has been updated to require an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The City of Los Angeles aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. Therefore, the transportation requirements and mitigations for proposed developments should be consistent with the City's transportation goals and policies.

Projects shall be analyzed to identify potential conflicts with adopted City plans and policies and, if there is a conflict, improvements that prioritize access for and improve the comfort of people walking, bicycling, and riding transit in order to provide safe and convenient streets for all users should be identified. Projects designed to encourage sustainable travel help to reduce VMT. As such, in accordance with the TAG, a project that generally conforms with and does not obstruct

the City's development policies and standards would be considered consistent under Appendix G Threshold (a).

(3) VMT Analysis

a. *VMT: Evaluation Criteria and Methodology*

For land use projects, the intent of this threshold is to assess whether a land use or plan causes substantial increase in vehicle miles traveled. In order to assess the VMT expected to be generated by a proposed Project, the City developed a VMT Calculator. The VMT Calculator is designed to evaluate development projects within the City of Los Angeles, and the VMT methodology and impact thresholds built into the tool are tailored to the guidelines set forth in the TAG. The tool calculates project-specific metrics, such as daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for residential and non-residential projects. It should be noted that the tool is not intended to be utilized for regional-serving retail projects, entertainment projects, or event venues. However, as the proposed Project is not a regional-serving retail projects, an entertainment project, or an event venue, it is the appropriate tool to evaluate the VMT impact threshold. The tool also automatically evaluates the screening criteria and applies the impact criteria set forth in the TAG. The City's adopted screening and impact criteria are based on recommendations provided in OPR's Technical Advisory but have been modified to reflect local considerations.

The City's VMT calculator includes all vehicle types (i.e. trucks and passenger cars), however, the reported average work VMT per employee does not include service trips⁵ pursuant to the State's OPR Guidance. State OPR Guidance focuses on the reduction of automobile (i.e., cars and light duty trucks) to address CARB's GHG emission reduction targets from cars and light duty trucks. Thus, the City's established efficiency-based impact thresholds also do not reflect the incorporation of VMT from service trips. SB 743 requires the VMT analysis to focus on land use strategies that affect cars and light duty trucks. Therefore, the City's VMT calculator evaluates employee trips and not service trips. Nonetheless, good movement and service truck trips have been calculated within the traffic study for informational purposes and for in order to account for, other potential environmental impacts related to trucks/goods movement, such as emissions and noise, which have been considered and analyzed throughout this Draft EIR, specifically Sections IV.B, Air Quality, IV-G, Greenhouse Gas Emissions, and IV.I, Noise.

b. *VMT Impact Thresholds*

A project would have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the

⁵ Freight trips with the primary purpose of movement of goods.

Area Planning Commission (APC) area in which the project is located.

- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC 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.

Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City of Los Angeles 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 APC boundary areas are set forth in the TAG. According to the TAG, the VMT generated by a residential or employment project is considered significant if it exceeds the thresholds presented in Table IV.J-3.

Table IV.J-3
City of Los Angeles VMT Impact Threshold Criteria

Area Planning Commission	15 Percent Below Existing VMT	
	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

Source: Linscott, Law & Greenspan, Engineers 2020.

The proposed Project is located in the Harbor APC. Therefore, the VMT impact criteria applicable to the proposed Project would be 12.3 daily work VMT per employee. The proposed Project does not include a residential component, and, therefore, the daily household VMT per capita does not apply.

c. *Freeway Safety Analysis*

On May 1, 2020, the City issued a memorandum to provide interim guidance on the preparation of freeway safety analysis for land use proposals that are required by LADOT to prepare a

Transportation Assessment. Transportation Assessments are required to: 1) analyze freeway ramp queuing where the Project adds 25 or more trips during the AM or PM peak hours; 2) use Synchro analysis software; 3) evaluate the adequacy of the existing and future storage lengths, use the 95th percentile queue provided from the Synchro results worksheet, and use 100 percent of the storage length on each lane of the ramp from the stop line to the gore point; 4) determine whether the Project would cause or add to a queue extending onto the freeway mainline. If the Project would extend vehicle queues onto the freeway mainline by less than two car lengths, the project would cause a less-than-significant safety impact. If a potential safety issue is identified, then, to offset this potential condition, a project should consider preferred corrective measures, including TDM strategies, to reduce the project's trip generation, investments in active transportation or transit system infrastructure to reduce the project's trip generation, changes to traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical changes to the ramp would have to demonstrate substantial safety benefits, not be a VMT inducing improvement, and not result in environmental issues.

c. Project Design Features

T-PDF-1: Loading. All loading and unloading at the Project Site will occur at the rear of the building, along the north side of the Project Site adjacent to the Union Pacific right-of-way and out of sight from public sidewalks. A 14-foot sound wall will be constructed along the northerly property boundary to further screen the on-site loading activities from the existing uses north of the site. Truck access to the loading area will be accommodated by the Vermont Avenue driveway and the northerly driveway on Orchard Avenue only. The Project Site will be designed such that the loading activities will occur more than 300 feet from the nearest residential unit and out of view from the public right-of-way, which exceeds the requirements for vehicle loading and unloading set forth in LAMC Section 114.03.

T-PDF-2: Construction Staging and Traffic Management Plan. Should any such pedestrian detours or temporary travel lane closures be proposed, traffic control/management plans will be prepared for the required review and approval by LADOT. Accordingly, the CSTMP will include, but not be limited to the following features, as appropriate:

- Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on-and-off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses;

- Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency;
- Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;
- To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles would utilize for the delivery of construction materials (i.e. lumber, tiles, piping, windows, etc.), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project;
- Require the Applicant to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations;
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport will be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT;
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets will at all times yield to public traffic;

- Construction-related parking and staging of vehicles will occur on-site to the extent possible, but may occur on nearby public parking lots, as approved by the City;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site; and
- The CSTMP will meet standards established in the current California Manual on Uniform Traffic Control Device (MUTCD), as well as City of Los Angeles requirements.

T-PDF-3: Transportation Demand Management Program. Transportation demand management (TDM) measures are aimed at reducing vehicular traffic generated at project sites and the associated need for parking. TDM measures decrease the number of vehicular trips generated by persons traveling to/from the site by offering specific facilities, services and actions designed to increase the use of alternative transportation modes (e.g., transit, walking, and bicycling) and ridesharing.

In order to comply with the City's Trip Reduction Ordinance⁶, a formal Preliminary TDM Plan will be developed in conjunction with LADOT prior to issuance of a building permit for the Project. This preliminary plan will include, at a minimum, measures consistent with the City's Trip Reduction Ordinance. A Final TDM Plan will be prepared prior to issuance of any building permit. The Project TDM plan could include some of the following measures:

- *TDM Information/Promotional Materials.* Provide transportation information in a highly visible and accessible location within the building, including information on local transit providers, area walking routes, bicycling maps, etc., to inform employees and visitors of available alternative transportation modes to access the Project, other amenities in the area and travel opportunities in the area. Highlight the environmental benefits of utilization of alternative transportation modes. In addition, make available transit fare

⁶ *City of Los Angeles Ordinance 168,700 (Transportation Demand Management and Trip Reduction Measures, effective 3/31/93) added Section J to Section 12.26 of the Los Angeles Municipal Code to provide transportation demand management features within new buildings which would facilitate the use of alternative transportation modes to decrease dependency on vehicles carrying only one person.*

media and day/month passes for purchase by employees and visitors during typical business hours.

- *Transit Welcome Package.* Provide all new employees with a Transit Welcome Package (TWP) in addition to holding a Transportation Fair on an annual basis. At a minimum include information regarding the employer/s' arrangements for free or discounted use of the transit system, area bus/rail transit route and connections/transfers information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the Project.
- *Carpool Program for Employees.* Provide preferential parking within the on-site parking areas for employees who commute to work in registered carpools. An employee who drives to work with at least one other employee to the site may register as a carpool entitled to preferential parking within the meaning of this provision.
- *Public Transit Stop Enhancements.* Work in cooperation with LADOT and other transit agencies to improve the existing bus stop on Vermont Avenue with a shelter and transit information. Enhancements could include enhanced weather/sun protection, lighting, benches, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative.
- *Convenient Parking/Amenities for Bicycle Riders.* Consistent with the City's Municipal Code requirements, provide locations at the Project Site for convenient bicycle parking for employees and visitors. Bicycle parking may include bicycle racks, locked cages, or another similar parking area. Provide shower facilities for employees who commute to work via bicycle. Refer to Figure II-4, Site Plan, for a summary of the number of long-term and short-term bicycle parking spaces proposed to be provided by the Project.
- *Local Hiring Program.* To the extent feasible, when hiring, conduct outreach to residents who live in the study area based on satisfaction of other requirements of the available positions.
- *Flexible/Alternative Work Schedules.* Encourage tenants in the building to offer flexible or alternative work schedules, as well as the opportunity to telecommute if feasible.

- *Parking Cash-Out Program.* Require in any lease it executes as landlord for space within the Project that a parking cash-out program be provided if employees are charged for parking. Parking cash-out program refers to an employer-funded program under which an employer offers in-lieu of any parking subsidy, a transit subsidy or cash allowance (for use of alternative modes such as walking and bicycling) of equal or greater value.

c. Analysis of Project Impacts

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

(1) Impact Analysis

a. Screening Questions

Attachment D in the TAG identifies screening questions to determine which plans, policies, and programs apply to a project. The City's TAG notes that a comparison of the results to the evaluation criteria is to be provided in order to determine the level of impact. This section provides a summary of the consistency review comparing the characteristics of the proposed Project and site design features (i.e., including the site access and circulation scheme) with the City's adopted plans and policies. Table IV.J-4 summarizes the City's guiding questions contained in the TAG (TAG Attachment D), the responses applicable to the proposed Project, the relevant and supporting City plans, policies and programs, as well as the determination of whether or not the proposed Project is consistent with the corresponding City plans, programs, ordinances or policies. As shown in Table IV.J-4, the proposed Project is consistent with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. Further, operation of the proposed Project will comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in the City of LAMC Section 12.26 J) and the other requirements pursuant to the LAMC.

Table IV.J-4 Questions to Determine Project Applicability to Plans, Policies, and Programs

Guiding Questions	Relevant Plans, Policies, and Programs	Response
A. Mobility Plan 2035 Public Right of Way (PROW) Classification Standards for Dedications and Improvements		
A.1. Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone?	Mobility Plan 2035 Policies 2.1, 2.3, and 3.2.	Yes. The Project Site is located on a site zoned M2-1VL-O and is bordered by Vermont Avenue (Avenue I) and Redondo Beach Blvd (Boulevard II). ¹
A.2. Is the Project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designations?	Mobility Plan 2035 Policies 2.1, 2.3, and 3.2.	Yes. The proposed Project includes roadway improvements to Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue that would comply with Mobility Plan 2035's roadway standards.
A.3. Is the Project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II, or III)?	Mobility Plan 2035 Policies 2.1, 2.3, and 3.2.	Yes. The Project would make the dedications and improvements necessary to meet the designated dimensions on Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue. Because the responses to A.1, A.2, and A.3 are yes, then the Project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.
B. Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes		
B.1 Does the Project physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?	Mobility Plan 2035 Policies 2.1, 2.3, 3.2, and 2.10	No. The Project would improve access to the property. The Project is required to provide roadway dedications and physical improvements along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue pursuant to the improvements identified by BOE for the previous project (see BOE's previous inter-departmental correspondence (i.e., dated July 6, 2017; Appendix I3). The Project would also construct new pedestrian sidewalks along Vermont Avenue, Redondo Beach Boulevard,

Table IV.J-4 Questions to Determine Project Applicability to Plans, Policies, and Programs

Guiding Questions	Relevant Plans, Policies, and Programs	Response
		and Orchard Avenue, including a 30-foot curb radius and standard access ramp in compliance with ADA requirements at the intersections of Vermont Avenue at Redondo Beach Boulevard and Redondo Beach Boulevard at Orchard Avenue.
B.2. Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT's Driveway Design Guidelines (See Sec. 321 in the Manual of Policies and Procedures)?	Mobility Plan 2035 Policies 2.10; Mobility Plan 2035 Program PL.1. Driveway Access; Citywide Design Guidelines – Guideline 2.	<p>No. New driveways are proposed as required for site access but would result in a consolidation of existing driveways. The existing site has eight driveways, and the proposed Project includes four driveways designed to be consistent with LADOT's Driveway Design Guidelines.]</p> <p>Therefore, the Project would reduce the number of driveways on Vermont Avenue and Redondo Beach Boulevard. Furthermore, sole access along a collector/local street is not possible to meet the circulation needs of the proposed site plan. The Project would not locate new driveways on an Avenue or Boulevard within 150 feet from an intersection or exceed one driveway per 200 feet. Therefore, the Project would be consistent with LADOT's Driveway Design Guidelines.</p> <p>Because the responses to B.1 and B.2 are both No, then the Project would not conflict with a plan or policies that govern the PROW as a result of Project-initiated changes to the PROW.</p>
C. Network Access		
C.1.1 Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?	Mobility Plan 2035 Policy 3.9	No. The Project would not vacate or restrict public access to a street, alley, or public stairway. As such, no further analysis is required.
C.2.1 Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?	Mobility Plan 2035 Policy 3.10	Yes. The Project proposes driveway access at the end of the existing cul-de-sac on Orchard Avenue.

Table IV.J-4 Questions to Determine Project Applicability to Plans, Policies, and Programs

Guiding Questions	Relevant Plans, Policies, and Programs	Response
C.2.2 If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?	Mobility Plan 2035 Policy 3.10	Yes. The Project would maintain convenient and direct public access to for all modes of travel. Because the response to C.1.1 is No and C.2.1 and C.2.2 are Yes, then the Project would not conflict with a plan that ensures access for all modes of travel.
D. Parking Supply and Transportation Demand Management		
D.1 Would the project propose a supply of on-site parking that exceeds the baseline amount as required? in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails?	Mobility Plan 2035 Policy 3.8, 4.8, and 4.13	No. The total required parking is 194 spaces, and the Project would provide 194 spaces, of which 20 spaces would be charging stalls for electric vehicles (EV) and an additional 38 spaces would be EV-ready. As such, no further analysis is required.
D.3. Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?	LAMC Section 12.21 A.16.	Yes. The required bicycle parking for the Project is 12 short-term and 12 long-term stalls. The Project would provide 16 short-term and 16 long-term bicycle parking stalls. As such, no further analysis is required.
D.4. Does the Project include more than 25,000 square feet of gross floor area construction of new nonresidential gross floor?	TDM (Section 12.26 J)	Yes. The Project includes a 340,298-square-foot warehouse/manufacturing/ high-cube warehouse/distribution center.
D.5 If the answer to D.4. is YES, does the project comply with the City's TDM Ordinance in Section 12.26 J of the LAMC?	TDM (Section 12.26 J)	Yes. The Project would comply with the City's TDM Ordinance (see Project Design Feature T-PDF-3). As such, no further analysis is required.
E. Consistency with Regional Plans		
E.1 Does the Project or Plan apply one [sic] the City's efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in Section 2.2.3 of the TAG?	SCAG's 2020-2045 RTP/SCS	Yes, the Project applies the City's efficiency-based impact threshold (i.e., VMT per employee). As such, no further analysis is required.
E.2 If the Answer to E.1 is YES, does the Project or Plan result in a significant VMT impact?	SCAG's 2020-2045 RTP/SCS	No. No significant work VMT per employee impacts are anticipated based on the City's recently adopted

Table IV.J-4 Questions to Determine Project Applicability to Plans, Policies, and Programs

Guiding Questions	Relevant Plans, Policies, and Programs	Response
		TAG and the significance thresholds contained therein. Because the response to E.2 is No, then the Project is shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.

Notes:

¹ City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035: An Element of the General Plan*.

Based on the screening questions above, the Project would not conflict with the following plans, policies, and programs: Mobility Plan 2035 Policies 2.1, 2.3, 3.2, 2.10, 3.8, 3.9, 3.10, 4.8, 4.13; Mobility Plan 2035 Program PL.1; Citywide Design Guidelines – Guideline 2; LAMC Section 12.26 J; and SCAG's 2020-2045 RTP/SCS.

b. Mobility Plan 2035

As discussed above under the Regulatory Framework, the Mobility Plan combines “complete street” principles with the following five goals that define the City’s mobility priorities:

1. Safety First
2. World Class Infrastructure
3. Access of all Angelenos
4. Collaboration, Communication, and Informed Choices
5. Clean Environments and Healthy Communities

A detailed analysis of the Project’s consistency with the policies in the Mobility Plan 2035 is provided in Table IV.J-5 below.

**Table IV.J-5
Consistency Analysis with Mobility Plan 2035 Goals**

Goals	Consistency Discussion
Chapter 1: Safety First	
<p><u>Policy 1.1 Roadway User Vulnerability:</u></p> <p>Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>	<p>Consistent. The Project Site is located at the northeast corner of the intersection of Vermont Avenue and Redondo Beach Boulevard. The proposed Project would consolidate the number of driveways providing access to the Project Site from the existing eight driveways to four driveways, which includes two driveways along Orchard Street, one driveway on Vermont Avenue, and one driveway on Redondo Beach Boulevard. Driveways are located away from intersections bordering the Project Site. As part of the proposed Project, sidewalks would be constructed along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue. All current site access points will be closed, with sidewalk, curb, and gutter reconstructed to the City of Los Angeles' current standards. Additionally, the proposed Project would improve the pedestrian rail crossing to provide a connection to the sidewalk north of the Project Site along Vermont Avenue. The reduction of driveways onto the Project Site along with improvements to sidewalks, curbs and gutters to current standards would reduce pedestrian-vehicle conflicts and increase safety of the most vulnerable roadway user.</p>
Chapter 2: World Class Instructure	
<p><u>Policy 2.3 Pedestrian Infrastructure:</u></p> <p>Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p>Consistent. The proposed Project would improve sidewalks bordering the Project Site. The proposed Project would improve the pedestrian rail crossing to provide a connection to the sidewalk north of the Project Site along Vermont Avenue. In addition, the proposed Project would provide pedestrian pathways throughout the Project Site that links from the proposed building's various entry points to the adjacent public sidewalks. Sidewalks would be improved with street landscaping. The proposed Project would install a new public bus turn-out lane and bus shelter at the existing bus stop located on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection. As such, the proposed Project's right-of-way improvements supports pedestrian access, public transportation, and a comfortable walking environment. The proposed Project's improvements to Vermont Avenue, Redondo Beach Boulevard, and Orchard Street would meet applicable City Standards for roadway width and dedication.. Therefore, the Project's design would provide a safe and comfortable walking environment.</p>
<p><u>Policy 2.5 Transit Network:</u></p> <p>Improve the performance and reliability of existing and future bus service.</p>	<p>Consistent. Although the Project Site is not a part of the transit enhanced network, the Project would improve performance of existing and future bus service by installing a new public bus turn-out lane and bus shelter at the existing bus stop located</p>

**Table IV.J-5
Consistency Analysis with Mobility Plan 2035 Goals**

Goals	Consistency Discussion
	on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection.
<p><u>Policy 2.6 Bicycle Networks:</u></p> <p>Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.</p>	<p>Consistent. Vermont Avenue, which has been selected for a Tier 1 Protected Bicycle lane, currently accommodates a striped bike lane along the east side of the roadway north of Redondo Beach Boulevard. The Project would encourage bicycling for employees by providing 32 bicycle parking spaces, consisting of 16 short-term and 16 long-term bicycle parking spaces.</p>
<p><u>Policy 2.10 Loading Areas:</u></p> <p>Facilitate the provision of adequate on and off-street loading areas.</p>	<p>Consistent. All loading and unloading at the Project Site would occur on-site at the rear of the building, along the north side of the Project Site adjacent to the Union Pacific Railroad right-of-way and out of sight from public sidewalks. A 14-foot wall would be constructed along the northerly property boundary to further screen the on-site loading activities from the existing uses north of the site. Truck access to the loading area would be accommodated by the Vermont Avenue driveway and the northerly driveway on Orchard Avenue only. The on-site loading activities would be sufficient to meet the Project Site needs for loading.</p>
Chapter 3: Access for All Angelenos	
<p><u>Policy 3.1 Access for All:</u></p> <p>Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City’s transportation system.</p>	<p>Consistent. The proposed Project would recognize all modes of travel, including goods movement, by improving sidewalks along Vermont Avenue, Redondo Beach Boulevard, Orchard Street, and the pedestrian rail crossing. The proposed Project would install a new public bus turn-out lane and bus shelter at the existing bus stop located on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection. The proposed Project supports multiple modes of transportation and increases connectivity for all Angelenos by installing a new bus turn-out and shelter with a standard access ramp in compliance with ADA requirements, and providing 32 bicycle parking stalls.</p>
<p><u>Policy 3.2 People with Disabilities:</u></p> <p>Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>Consistent. The Project would accommodate the needs of people with disabilities by installing a new bus turn-out and shelter with a standard access ramp in compliance with ADA requirements.</p>
<p><u>Policy 3.8 Bicycle Parking:</u></p> <p>Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.</p>	<p>Consistent. The Project would encourage bicycling for employees by providing 32 bicycle parking spaces, consisting of 16 short-term and 16 long-term bicycle parking spaces.</p>
Chapter 4: Collaboration, Communication & Informed Choices	
<p><u>Policy 4.8 Transportation Demand Management Strategies:</u></p>	<p>Consistent. The proposed Project’s TDM program (see Project Design Feature T-PDF-3) promotes communication and informed choices on transportation alternatives for its</p>

**Table IV.J-5
Consistency Analysis with Mobility Plan 2035 Goals**

Goals	Consistency Discussion
Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	employees, including but not limited to providing TDM information and promotional materials and a transit welcome package. In addition, the proposed Project's TDM program encourages alternatives to driving which would be communicated to future employees. The proposed Project would improve the existing bus stop at Vermont Avenue and Redondo Beach Boulevard, including providing transit information.
<p><u>Policy 4.12 Goods Movement:</u></p> <p>Increase public awareness about the importance and economic value of goods movement in the Los Angeles region.</p>	<p>Consistent. The Project would support the City's goal of increasing public awareness of the importance and economic value of goods movement in the region by developing the Project Site with a 340,298-square-foot warehouse/manufacturing/high-cube warehouse/distribution center in close proximity to the Ports of Los Angeles and Long Beach and the regional highway system.</p>
<p><u>Policy 4.13 Parking and Land Use Management:</u></p> <p>Balance on-street and off-street parking supply with other transportation and land use objectives.</p>	<p>Consistent. The Project would provide sufficient off-street (on-site) parking to accommodate Project parking demand. The total required parking is 194 spaces, and the Project would provide 194 spaces.</p>
Chapter 5: Clean Environments & Healthy Communities	
<p><u>Policy 5.2 Vehicle Miles Traveled (VMT):</u></p> <p>Support ways to reduce vehicle miles traveled (VMT) per capita.</p>	<p>Consistent. As discussed under the "World Class Infrastructure" and "Access for All Angelenos" goals, the proposed Project would improve sidewalks along Vermont Avenue, Redondo Beach Boulevard, and Orchard Street along with an improved pedestrian rail crossing. Sidewalks would contain landscaping. The proposed Project would install a new public bus turn-out lane and bus shelter at the existing bus stop located on the northeast corner of the Vermont Avenue/Redondo Beach Boulevard intersection. As part of the TDM program (see Project Design Feature T-PDF-3 above), the proposed Project would provide TDM measures, such as a transit welcome package for all employees, carpooling program for employees, convenient parking/amenities, flexible/alternative work schedules, and parking cash-out programs. As such, the proposed Project supports ways to reduce VMT per capita..</p>

Source: City of Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan.

Table IV.J-5 demonstrates that the Project characteristics support the goals and policies in the Mobility Plan 2035. Therefore, the Project is consistency with and would not conflict with the Mobility Plan 2035.

c. *LAMC*

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. As stated previously, the Project would comply with LAMC Section 12.21 A.16 and provide 16 short-term and 16 long-term bicycle parking stalls in exceedance of the required 12 short-term and 12 long-term stalls. Additionally, the Project Site has been designed such that the loading activities will occur more than 300 feet from the nearest residential unit and out of view from the public right-of-way, exceeding the requirements for vehicle loading and unloading set forth in LAMC Section 114.03.

LAMC Section 12.26 J, the TDM Ordinance, establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area. The Project would incorporate TDM measures (see Project Design Feature T-PDF-3) as part of the Project design aimed at encouraging use of alternative transportation modes in accordance with the requirements set forth in the TDM ordinance. Specifically, components of the TDM Program could include a variety of measures, including TDM information/promotional materials, transit welcome package, carpool program for employees, public transit stop enhancements, convenient parking/amenities for bicycle riders, local hiring program, flexible/alternative work schedules, and parking cash-out program.

Therefore, the Project would not conflict with LAMC sections related to transportation, bicycle parking, and loading/unloading activities.

d. *Other Plans and Policies.*

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. A consistency analysis for the Citywide Urban Design Guidelines is provided in Appendix J of this Draft EIR.

As discussed in detail in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project would not conflict with SCAG's 2020–2045 RTP/SCS policies related to encouraging pedestrian activity and reducing VMT.

Based on the analyses above, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant.

(2) **Mitigation Measures**

Project impacts related to consistency with adopted City plans, programs, ordinances, and policies regarding the circulation system would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts related to the consistency with adopted City plans, programs, ordinances, and policies regarding circulation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

(1) Impact Analysis

The daily vehicle trips and daily VMT expected to be generated by the proposed Project were forecast using the City's VMT Calculator tool. Copies of the detailed City of Los Angeles VMT Calculator worksheets for the proposed Project are contained in Appendix C-2 of the TAR (see Appendix I1). As indicated in the summary VMT Calculator worksheet, the proposed Project is forecast to generate the following:

- The proposed Project is estimated to generate a total of 1,975 daily vehicle trips.
- The proposed Project is estimated to generate a total of 12,800 daily VMT.
- The proposed Project is estimated to generate 9.7 daily work VMT per employee, which is less than the Harbor APC significance threshold of 12.3 VMT per employee.

Because the Project would not result in significant impacts, no mitigation measures are required. However, as discussed above, the Project would implement TDM measures (see Project Design Feature T-PDF-3), which includes providing a transit welcome package for all employees, carpooling program for employees, convenient parking/amenities, flexible/alternative work schedules, and parking cash-out programs. These additional TDM measures were conservatively excluded from the VMT analysis but are included as part of the Project to minimize VMT.

The proposed Project's 9.7 daily work VMT per employee is less than the 12.3 VMT per employee based on the Harbor APC, therefore, a less than significant impact would occur.

(2) Mitigation Measures

Project impacts related to VMT would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts related to VMT would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

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

As discussed in Subsection VI.6, Impacts Found Not to be Significant, and in the Initial Study (Appendix A) of this Draft EIR, the Project's truck traffic would be diverted away from automobile traffic via two separate access driveways off of Vermont Avenue and Orchard Avenue. In addition, the Project does not propose substantial changes to the street network surrounding and supporting the Project Site, such as the redesign or closure of major streets, — or increase hazards or impact emergency access due to design features. Instead, the existing surrounding roadway circulation system would be maintained, and no substantial changes or significant congestion would occur that would affect the ability of emergency vehicles to continue to serve all areas of the Project Site. Additionally, the Project does not propose new incompatible uses into the City's circulation system.

a. Project Access

The following section provides a qualitative review of the proposed site access points. As discussed previously, the Project proposes to close all eight existing curb cuts, which currently provide access to the Project Site, and construct four new project driveways, resulting in significant consolidation of the Project Site access points.

A review of pedestrian and bicycle counts in the area indicates a moderate level of existing activity (see Appendix B of Appendix I1 of this Draft EIR). The Project is planned to provide public sidewalks along all three roadways adjacent to the Project Site. Therefore, Project traffic utilizing the proposed driveways would be required to cross public right-of-way used by pedestrians. Additionally, a bike lane is currently provided in the public right-of-way along Vermont Avenue, north of Redondo Beach Boulevard, and an existing bus stop is provided adjacent to the Project Site. Project traffic utilizing the Vermont Avenue driveway would be required to share roadway space with bicycles and transit vehicles as well as pedestrians utilizing the adjacent sidewalks to access the bus stop. All proposed Project Site driveways would be constructed to the current City of Los Angeles standards and would provide clear lines of sight for all roadway users.

The Project Site driveways located on Vermont Avenue and Redondo Beach Boulevard have been designed to accommodate right-turn inbound and outbound movements only. Note that the Vermont Avenue driveway is naturally restricted to right-turn movements due to the presence of

a median island. Limiting vehicular turn movements at these driveways would reduce the potential for conflicts between pedestrians, bicycles, and motorized vehicles.

The Project driveway on Vermont Avenue and the northerly Project driveway on Orchard Avenue are planned to accommodate truck access to and from the Project Site. The adequacy of these driveways to accommodate safe and efficient access for tractor-trailer trucks has been verified through a truck turning/maneuvering analysis prepared using the AutoTurn software package. The truck turning analyses were prepared utilizing the WB-67 design vehicle, which has a maximum overall length of 73.5 feet, in order to provide a conservative estimate of the access requirements for the tractor-trailer style trucks which are expected to utilize the Project Site. Based on the modeling, the Project driveways are expected to adequately accommodate tractor-trailer truck access (see Figures D-1 and D-2 in Appendix I1 of this Draft EIR). Further, the Vermont Avenue driveway is designed to accommodate an on-site queue of approximately five trucks, and the Orchard Avenue driveway is designed to accommodate an on-site queue of up to two trucks without extending into the public right-of-way.

Based on the review of the Project Site driveways outlined above, no safety concerns relating to geometric design of the Project Site access points would occur. As the Project Site frontage encompasses the entire block along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue, no cumulative impacts due to the presence of other Projects on the same block would occur. **Therefore, the Project would not result in a substantial increase in hazards due to a geometric design feature.**

b. Caltrans Facilities

As stated previously, the City issued a memorandum to provide interim guidance on the preparation of freeway safety analysis for land use proposals that are required by LADOT to prepare a Transportation Assessment. Transportation Assessments are required to: 1) analyze freeway ramp queuing where the Project adds 25 or more trips during the AM or PM peak hours; 2) use Synchro analysis software; 3) evaluate the adequacy of the existing and future storage lengths, use the 95th percentile queue provided from the Synchro results worksheet, and use 100 percent of the storage length on each lane of the ramp from the stop line to the gore point; 4) determine whether the Project would cause or add to a queue extending onto the freeway mainline. If the Project would extend vehicle queues onto the freeway mainline by less than two car lengths, the project would cause a less than significant safety impact

Section 13.0 of Appendix I1 of this Draft EIR, included an analysis of facilities under the jurisdiction of Caltrans. The analysis included freeway mainline segments, ramp intersections, and off-ramp queuing. Two Caltrans ramp intersections were analyzed to determine off-ramp queue lengths. In order to address the City's interim guidance and provide a response to Caltrans comments provided during the Notice of Preparation (NOP) process and subsequent clarifications; queuing analyses were prepared for the I-110 southbound off-ramp at Redondo Beach Boulevard and the I-110 northbound off-ramp at Redondo Beach Boulevard. While the eastbound Redondo Beach

Boulevard right-turn to the I-110 northbound on-ramp was analyzed, this traffic movement falls within the City of Los Angeles jurisdiction and is not directly related to the Caltrans freeway safety analysis.

The technical analyses of Caltrans facilities are provided in Appendix E of Appendix I1, Traffic Analysis Report of this Draft EIR, along with the corresponding LOS and queuing worksheets for each type of analysis. Appendix Table E-3 of Appendix I1, summarizes the Caltrans off-ramp vehicle queuing analyses. While the vehicle queuing on the I-110 southbound off-ramp at Redondo Beach Boulevard is forecast to total 1,428 feet and shown to exceed the 85 percent storage length (1,340 feet) in the Future Year 2022 With Project conditions, it does not exceed the actual off-ramp storage length (i.e., a storage length of 1,580 feet). Vehicle queuing on the I-110 northbound off-ramp at Redondo Beach Boulevard is forecast to total 685 feet and would not exceed the 85 percent storage length (1,970 feet) in the Future Year 2022 With Project conditions. As such, the forecast queue would not exceed the actual off-ramp storage length. **Therefore, the Project would not result in a substantial increase in hazards due to a geometric design feature.**

(2) Mitigation Measures

Project impacts related to substantially increasing hazards due to a geometric design feature or incompatible use would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts related to substantially increasing hazards due to a geometric design feature or incompatible use were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the project result in inadequate emergency access?

As discussed in Subsection VI.6, Impacts Found Not to be Significant, and in the Initial Study (Appendix A) of this Draft EIR, the Project Site is located approximately 0.13 mile west of I-110, the nearest designated Disaster Route. The Project would not require the closure of any public or private streets during construction or operation and would not impede emergency vehicle access to the Project site or surrounding area. Additionally, emergency access to and from the Project Site would be provided in accordance with requirements of LAFD. **Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur with respect to Threshold (d), and no further analysis is required.**

4. Cumulative Impacts

(1) Impact Analysis

a. *Conflict with a Program, Plan, Ordinance, or Policy addressing the Circulation System*

The proposed Project would result in a less than significant impact to traffic and pedestrian circulation. Construction of each related project, including vehicle lane and sidewalk closures, would be coordinated and approved by each related project's respective lead agency. Therefore, no cumulative impact would occur.

As discussed above, the proposed Project would be consistent with relevant plans, ordinances, and policies. Further, the proposed Project does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. Each related project, outlined in Table III-2 in Chapter III, Environmental Setting, would be expected to comply with all applicable relevant plans, ordinances, and policies. **Therefore, no cumulative impact would occur.**

b. *Vehicle Miles Traveled*

Similar to the proposed Project, each related project would be required to analyze their respective project's impacts relating to VMT. Each related project would be required to implement mitigation measures should their project exceed the VMT threshold.

Long-term, or cumulative, effects are determined through a consistency check with the SCAG 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG emissions reduction targets. 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 emissions goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG document, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS. The proposed Project falls under the City's efficiency-based impact thresholds and would align with SCAG's RTP/SCS for long-term VMT and GHG reduction goals.

Therefore, the proposed Project would not contribute to a cumulative VMT impact related to daily vehicle trips. **Therefore, the proposed Project's impacts related to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.**

c. Geometric Hazards

Based on the review of the Project Site driveways outlined above, no safety concerns relating to geometric design of the Project Site access points would occur. As the Project Site frontage encompasses the entire block along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue, no cumulative impacts due to the presence of other Projects on the same block would occur.

Furthermore, the I-110 southbound off-ramp at Redondo Beach Boulevard and I-110 northbound off-ramp at Redondo Beach Boulevard would not exceed the actual off-ramp storage lengths in for Future Year 2022 With Project conditions. **Therefore, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to a substantial increase in hazards due to a geometric design would be less than significant.**

d. Emergency Access

As discussed above, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impacts would occur. **Therefore, the Project would not cumulatively contribute to inadequate emergency access, and no cumulative impact would occur.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.