IV. Environmental Impact Analysis

K. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *Transportation Assessment Report for the 1100 East 5th Street Project*[1] (Traffic Study), prepared for the Project, and included in its entirety in **Appendix L.1** of this Draft EIR.

The analysis of Vehicle Miles Traveled (VMT) is based on the Traffic Study. The Traffic Study was prepared pursuant to LADOT's Transportation Assessment Guidelines (July 2020) which establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Traffic Study was approved by LADOT on December 14, 2020.[2]. A copy of LADOT's Assessment Letter for the Traffic Study is included as **Appendix L.2** of 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 federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include.

- Americans with Disabilities Act of 1990
- Complete Streets Act
- Assembly Bill 32 and Senate Bill 375
- California Vehicle Code
- Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Mobility Plan 2035

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1 Linscott Law & Greenspan, Transportation Assessment Report, 1100 East 5th Street Project, Development for APNs 5163-024-009 and 5163-024-014, 1100 E 5th Street, Los Angeles, California, 90013, September 10, 2020.

2 City of Los Angeles, Transportation Assessment for the Proposed Mixed-Use Project Located at 1100 East 5th Street Project, Development for APNs 5163-024-009 and 5163-024-014, 1100 E 5th Street, Los Angeles, California, 90013, December 14, 2020.

- Central City North Community Plan
- Los Angeles Municipal Code
- LADOT Transportation Assessment Guidelines LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for A Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), 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) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

(b) Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (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 (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (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.

(c) California Vehicle Code

The California Vehicle Code (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.

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic

congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, which was an update to Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council 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 its Transportation Assessment Guidelines (TAG) in July 2019 and updated in July 2020, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop[3] or a stop along an existing high quality transit corridor[4] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates

[3] "Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 as a site containing an existing 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 a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[4] "High-quality transit corridors" are defined in (PRC)Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

to reflect professional judgment based on substantial evidence. As discussed further below, 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 for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG.

(3) Regional

(a) Southern California Association of Governments 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020-2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016-2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within one 0.5mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020-2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity,

improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a five percent reduction in VMT per capita, nine percent reduction in vehicle hours traveled, and a two percent increase in work-related transit trips.

(4) Local

(a) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[5] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan 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.

Street classifications are designated in the Mobility Plan, and may be amended by a Community Plan, and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

- Arterial Streets: Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
    - Boulevards represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
    - Avenues pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- Collector Streets: Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- Local Streets: Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.

[5] 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.

- Continuous local streets that connect to other streets at both ends, and/or
- Non-Continuous local streets that lead to a dead-end.

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.
- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) Central City North Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Central City North Community Plan area. The Community Plan includes the following transportation and circulation objectives that are applicable to the Project[6]:

[6] Los Angeles City Department of Planning, Central City North Community Plan.

Objective 12-1: To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policy 12-1.3: Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.

Policy 12-1.4: TDM measures in Central City North should be consistent with adopted City policy.

(c) Los Angeles Municipal Code

With regard to 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 is permitted on Sundays.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

With regard to on-site bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for long-term and short-term bicycle parking for residential and commercial buildings. Where there is a combination of uses on a lot, the number of bicycle parking spaces required shall be the sum of the requirements of the various uses. LAMC Section 12.21 A.16 also includes facility requirements, design standards and siting requirements for bicycle parking.

LAMC Section 12.26 J provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

(d) LADOT Transportation Assessment Guidelines

As discussed above, on July 30, 2019, LADOT updated its Transportation Impact Study Guidelines, 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 Transportation Assessment Guidelines (TAG) that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT most recently updated the TAG in July 2020. 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 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 improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[7]

(e) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the basic criteria for the review of driveway design. As discussed in MPP Section 321, the basic principle of driveway location planning is to minimize potential conflicts between users of the parking facility and users of the abutting street system, including the safety of pedestrians.

(f) Vision Zero

The Vision Zero Los Angeles program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network, which was last updated in 2018, represents 6 percent of the City's street miles but accounts for approximately two thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

(g) Interim Guidance for Freeway Safety

In May 2020, LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) identifying City requirements for a CEQA safety analysis of Caltrans facilities as part of a transportation assessment. The City Freeway Guidance relates to the identification of potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

(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.

[7] Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines.

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[8] The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b) Existing Conditions

(1) Existing Street and Freeway System

(a) Freeways

Regional access to the Project Site is provided by the I-10 (Santa Monica) Freeway located approximately one mile south of the Project Site, the US-101 (Hollywood) Freeway located approximately one mile north of the Project Site, and the I-5 (Santa Ana) Freeway located approximately one 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, three 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 vicinity, which are located approximately one mile southeast of the Project Site.

US-101 (Hollywood) Freeway - The US-101 (Hollywood) Freeway is a north-south oriented 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 Alameda Street on the US-101 Freeway in the Project study area.

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 and 7th Street on the I-5 Freeway in the Project area.

[8] City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.

(b) Streets System

A brief description of the roadways in the Project vicinity is provided in the following paragraphs:

Alameda Street - Alameda Street is a north-south oriented roadway located west of the Project Site. Within the Project study area, Alameda Street is designated as an Avenue I by the City. Two through travel lanes are generally provided in both directions on Alameda Street in the Project study area. Separate exclusive left-turn lanes are provided on Alameda Street in the southbound direction at major intersections. Alameda Street is posted for a 35 miles per hour speed limit in the Project study area.

Seaton Street - Seaton Street is a north-south oriented roadway that borders the Project Site to the west. Within the Project study area, Seaton Street is designated an Industrial Collector Street by the City. One through travel lane is generally provided in each direction on Seaton Street within the Project study area. There is no speed limit posted on Seaton 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.

4th Street - 4th Street is an east-west oriented roadway that is located north of the Project Site. Within the Project vicinity, 4th Street is designated as an Avenue II west of Alameda Street, as an Avenue III between Alameda Street and Hewitt Street, and as an Avenue II east of Hewitt Street by the City. West of Hewitt Street, two to four through travel lanes are generally provided in the eastbound direction on 4th Street within the Project vicinity. East of Hewitt Street, two through travel lanes are generally provided in each direction on 4th Street. 4th Street is posted for a 35 miles per hour speed limit within the Project vicinity.

5th Street - 5th Street is an east-west oriented roadway that borders the Project Site to the north. West of Alameda Street, 5th Street is a westbound one-way street. Within the Project study area, 5th Street is designated as an Avenue II west of Alameda Street, and as an Industrial Collector Street east of Alameda Street by the City. West of Alameda Street, three through travel lanes are generally provided in the westbound direction on 5th Street within the Project vicinity. East of Alameda Street, one through travel lane is generally provided in each direction on 5th Street. There is no speed limit posted on 5th 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.

Palmetto Street - Palmetto Street is an east-west oriented roadway located south of the Project Site. Within the Project study area, Palmetto Street is designated as an Industrial Collector Street by the City. One through travel lane is generally provided in each direction on Palmetto Street within the Project study area. There is no speed limit posted on Palmetto 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.

(c) City of Los Angeles High Injury Network

As discussed above, Vision Zero[9] 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. Originating in Sweden, the policy has been adopted in numerous other North American cities, including California cities such as San Francisco and San Diego.

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

- 4th Street west of Alameda Street
- 5th Street west of Stanford Avenue
- 6th Street between Alameda Street and Mateo Street
- Central Avenue
- Alameda Street north of 6th 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 Alameda Street and Palmetto Street. Public transit service in the immediate Project vicinity is currently provided by the Los Angeles County Metropolitan Transit Authority (Metro) and LADOT. The bus lines include: Metro Local Lines 18, 53, 62, Metro Rapid 720, and LADOT's Commuter Express 439, and DASH Downtown Route A. Additionally, the Project study area is located approximately 0.6 miles south of the Metro L Line (formerly 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**)**.

[9] Vision Zero Los Angeles 2015-2025, August 2015.

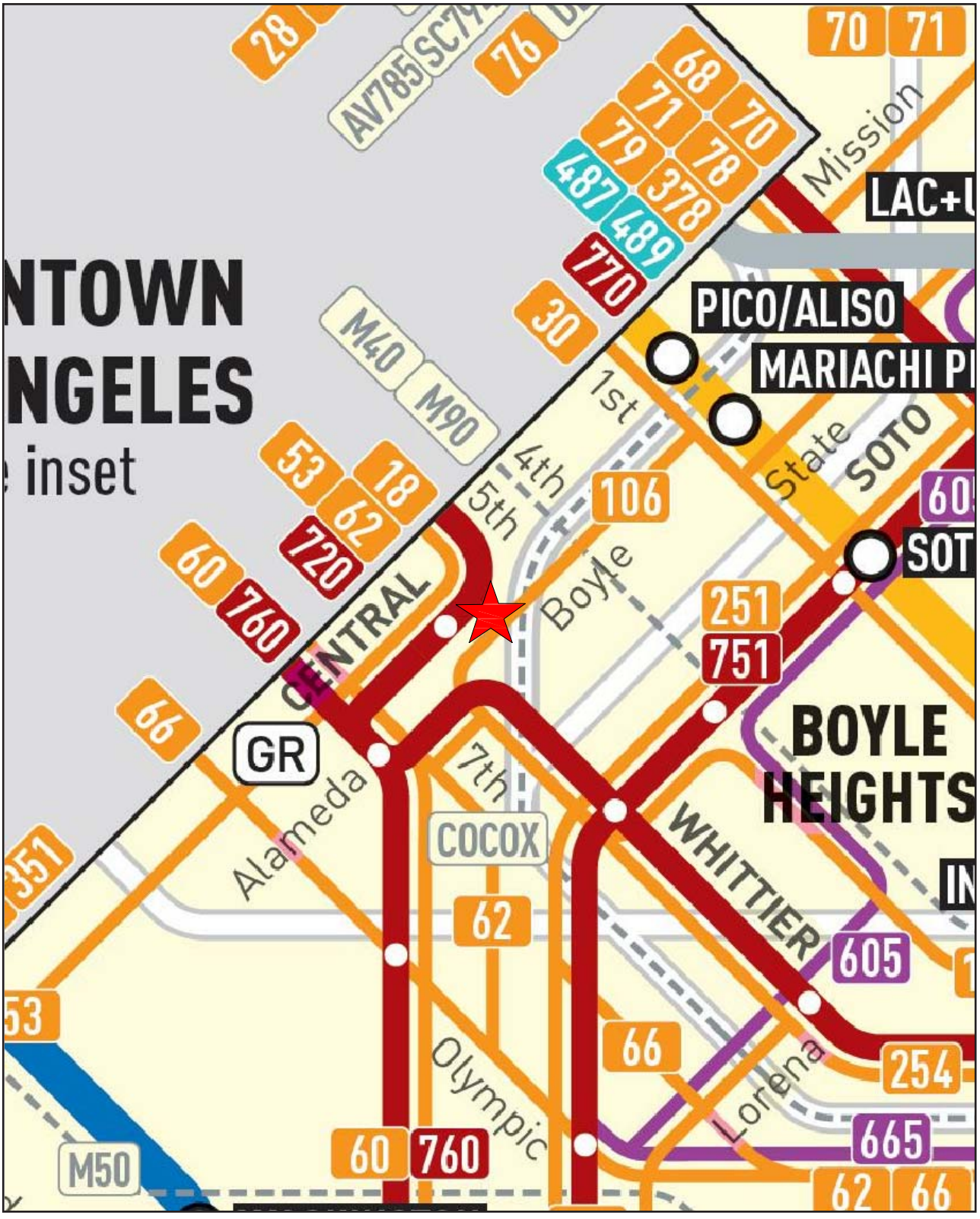
Table IV.K-1
Existing Public Transit Routes

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)	6th Street, Alameda Street	EB	6	8
			WB	6	11
Metro 53	Downtown LA to Carson (via Central Avenue)	Central Avenue	NB	6	5
			SB	4	8
Metro 62	Downtown LA to Hawaiian Gardens (via Telegraph Road)	6th Street	EB	2	2
			WB	3	3
Metro Rapid 720	Commerce to Santa Monica (via Wilshire Boulevard & Whittier Boulevard)	6th Street, Alameda Street	EB	6	15
			WB	10	6
Commuter Express 439	Downtown LA to El Segundo (via Hill Street, I-110 Freeway, and Douglas Street)	Alameda Street, 3rd Street, 4th Street	NB	0	1
			SB	1	0
DASH Downtown Route A	Little Tokyo to City West (via Alameda Street, 1st Street, Flower Street, and Figueroa Street)	Alameda Street, Seaton Street, Palmetto Street	EB	9	10
			WB	9	10
			Total	**62**	**79**

Source: Los Angeles County Metropolitan Transportation Authority (Metro) website, 2020.
Los Angeles Department of Transportation (Commuter Express) website, 2020.
Los Angeles Department of Transportation (DASH) website, 2020.

Public bus/rail transit service within the Project study area will also be improved with the Metro Regional Connector project, currently under construction, which will be a 1.9-mile underground light-rail system that will extend from the Metro L Line (formerly Gold Line) Little Tokyo/Arts District Station to the 7th Street/Metro Center Station.[10] The Regional Connector will improve access to both local and regional destinations by providing continuous thru service between the L (Gold), A (Blue), E (Expo), B (Red), and D (Purple) Lines and providing connectors to other rail lines via the 7th Street/Metro Center Station. The Little Tokyo/Arts District Station will be the closest transit station to the Project Site, located approximately 0.7 miles north. Three new transit stations will be developed in conjunction with the Metro Regional Connector. Completion and opening of the Metro Regional Connector is planned for the year 2022.

[10] Metro, Regional Connector Transit Project Website, available at: https://www.metro.net/projects/connector-2. Accessed August 22, 2022.



SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY

★ PROJECT SITE

Source: Linscott, Law & Greenspan, April 2019.

Figure IV.K-1
Existing Public Transit Routes

The West Santa Ana Branch Transit Corridor project will also improve transit operations within the Project study area.[11] 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 LA County. The transit line is expected to provide a direct connection to the C Line (Green), A Line (Blue), 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.

LADOT operates several DASH lines in the Downtown Area. DASH Downtown A Route services the Arts District and has been recently updated to operate farther south in the Arts District with three new stops. Two of the new stops are located approximately one block from the Project Site – 4th Street/Alameda Street and Colyton Street/Palmetto Street. DASH Downtown A Route connects the Arts District to the Metro L Line (formerly Gold Line) Station in Little Tokyo and traverses the Civic Center and Financial District via 1st Street, Figueroa Street and Flower Street, further connecting with various other transit stops along the way.

FASTLinkDTLA is the recently established Transportation Management Organization (TMO) in Downtown Los Angeles that will improve public transit service in the area.[12] 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,[13] 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 streets within the Project vicinity. A public sidewalk ranging in width from 5 feet to 8 feet is provided along the Seaton Street property frontage. 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). Pedestrian Enhanced Districts (PEDs) are established areas where improvements for pedestrians are prioritized relative to other roadway users. Roadways designated by the City as PEDs in close proximity to the Project Site and in the surrounding area

[11] Metro, Regional Connector Transit Project Website, available at: https://www.metro.net/projects/connector-2. Accessed August 22, 2022.

[12] FASTLinkDTLA, About Us Website, available at: https://fastlinkdtla.org/about/. Accessed August 22, 2022.

[13] Microtransit is an on-demand, rideshare service meant for short, local trips using small vehicles (seating up to 10 passengers). Metro's microtransit is currently available in Watts/Willowbrook, LAX/Inglewood, North Hollywood/Burbank, Compton/Artesia and El Monte, with service expanding in the Summer of 2021. Source: Metro, Metro Micro Website, available at: https://micro.metro.net. Accessed August 22, 2022.

are shown in Figure 3-2 of the Traffic Study (**Appendix L.1** of this Draft EIR).[14] 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:

- American With Disabilities Act (ADA) handicap ramps, including some with the yellow truncated domes, are provided at the following intersections located in the direct vicinity of the Project Site:
  - Alameda Street / 4th Street
  - Alameda Street / 5th Street
  - Alameda Street / Palmetto Street
  - Alameda Street / Factory Place
  - Alameda Street / 6th Street
  - Seaton Street / 4th Street
  - Colyton Street / 4th Street
  - Hewitt Street / 4th Street
  - Hewitt Street / 5th Street
  - Hewitt Street / Palmetto 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:
  - Alameda Street / 4th Street
  - Alameda Street / 6th 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.[15] 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 (low stress network) in close proximity to the Project Site and in the

[14] 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.

[15] 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.

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).

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 State CEQA Guidelines Appendix G and the TAG, the Project would have a significant impact related to transportation/traffic if it would:

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

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

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); or***

Threshold (d): ***Result in inadequate emergency access.***

b) Methodology

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City of Los Angeles (City) 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 Traffic Study, included as **Appendix L.1** of this Draft EIR, uses the July 30, 2019 version of the TAG.[16]

(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.

[16] 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.

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

The Governor's 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. As discussed above, 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. 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.

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The TAG identifies a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6 for the Central APC sub-area, in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 6.0, and average work VMT per employee be equal to or lower than 7.6, the Project's overall VMT impact would be less than significant.[17]

It is important to note that these thresholds—and the VMT analysis to which the thresholds apply—are based on specific types of one-way trips, including:

- Home-Based Work Production: trips to a workplace destination originating from a residential use at the Project Site.
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use at the Project Site.
- Home-Based Work Attraction: trips to a workplace destination at the Project Site originating from a residential use.

The location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of *Technical Advisory on Evaluating Transportation Impacts* in CEQA (California Governor's Office of Planning and Research, December 2018). Therefore, as detailed in City of Los Angeles VMT Calculator Documentation (LADOT and LADCP, February 2019) (VMT Calculator Documentation), the City's household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips and the work VMT per employee threshold applies to Home-Based Work Attraction trips.

[17] Transportation Assessment Guidelines, City of Los Angeles Department of Transportation, July 2019.

Other types of trips generated by the Project, including Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use at the Project Site), Home-Based Other Attraction (trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project Site originating from a non-residential use), are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment.

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.

(b) VMT Analysis Methodology

LADOT developed City of Los Angeles VMT Calculator Version 1.3 (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.

(i) 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.

(ii) 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 location's jobs/housing balance, which factors into how many trips are local or internal to a mixed use project.
- Land use density where the project is located, which factors into the likelihood of short trips, as well as walking and bicycling.
- Transportation network density, which affects the circuitry of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel.
- Proximity to transit, which affects the likelihood that residents or employees will travel via transit rather than automobile.
- Proximity to retail and other destinations, which affects the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities.
- Vehicle ownership rates, with higher levels of vehicle ownership leading to a higher rate of automobile trips.
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) and also affects the number of people when calculating the daily VMT per capita.

(iii) 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.

(iv) 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 the 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.[18] A summary of population and employment assumptions for various land uses is provided in Table 1 of City of Los Angeles VMT Calculator Documentation.

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

(3) Geometric Design Feature or Incompatible Use Hazards

The TAG include a methodology for analyzing impacts with respect to hazardous geometric design features. 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. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. Using this methodology, the Project design, including proposed infrastructure improvements, land uses, and open spaces, are reviewed to determine if the Project would increase and/or create a hazardous geometric design feature(s) and/or incompatible use.

(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

[18] The 2018 LAUSD Developer Fee Justification Study and Trip Generation 10th Edition are now available, but City's VMT Calculator utilized the editions indicated herein.

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.

(5) Freeway Safety Analysis

Based on the City Freeway Guidance, a transportation assessment for a development project should include analysis of nearby freeway off-ramps serving a project site where a project adds 25 or more morning or afternoon peak-hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria were met:

- Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.
- The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
- Theaveragespeedofmainlinefreewaytrafficadjacenttotheoff-rampduringthe analyzed peak hour(s) is greater than 30 miles per hour (mph).

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 the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change 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

Construction and operation of the Project will be implemented in accordance with applicable regulatory and code requirements related to transportation. Additionally, the Project will implement the following project design features (PDF) to avoid or minimize adverse construction and operational related impacts. The PDFs will be incorporated into the Project and are considered to be part of the Project for purposes of the impact analysis.

PDF TR-1 Prior to the issuance of a building permit for the Project, a detailed Construction Staging and Traffic Management Plan (CSTMP) will be submitted to LADOT'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 will 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 CSTMP will 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 potentially be under construction at around the same time as the Project will 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. LADOT also recommends that all construction related truck traffic be restricted to off-peak hours. The CSTMP will include, but not be limited to, the following elements as appropriate:

- Emergency access will be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction worker parking on nearby residential streets will be prohibited.
- Worker parking will 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 will be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., will 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 will be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists will 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 will be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant will keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk will 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 will be routed around any such lane or sidewalk closures.
- The locations of the off-site truck staging will be identified to include, staging in a legal area, and which will detail measures to ensure that trucks use the

specified haul route, and do not travel through nearby residential neighborhoods.

- There will 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.

PDF TR-2 **Transportation Demand Management Program**. A preliminary TDM program will 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.

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 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and a decrease in the number of bicycle spaces from 180 to 179. 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 L.4** 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-3, 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 is proposing to implement a modified street classification, the Living Streets initiative. The Living Street initiative is Green LA's effort to create safe streets for all uses through increased sidewalk widths, adding sidewalk bump-outs, landscaping, and street furniture, and narrowed travel lanes to slow vehicles. To establish this designation the Project would include sidewalk bump-outs, preserve on-street parking in certain locations, include streetscape landscaping, and modify travel lane widths. 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. Additionally, given the location of the Project Site along and in close proximity to transit, including the Metro L Line (formerly Gold Line) Little Tokyo/Arts District Station located approximately 0.6 mile north, 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.

Proposed vehicular access to the Project Site will be provided via one driveway located along the east side of Seaton Street, at the southwest portion of the Project Site (i.e., along the Project Site's westerly 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 Seaton Street, an Industrial Collector Street.[19] Additionally, there would be no vacation of public right-of-way with the Project or the Flexibility Option**.** For all the foregoing reasons, the Project or the Flexibility Option would not conflict with the applicable policies that support the goals and objectives set forth in the Mobility Plan 2035.

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 vacant warehouse uses and a surface parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options. The 220 live/work units will be able to access the ground floor commercial spaces and the other nearby commercial retail/restaurants. The Project's building frontage would provide a variety of ground floor commercial uses along 5th Street and Seaton Street. Overall, the Project or the Flexibility Option would support the Mobility Hubs Reader's Guide by developing a project that encourages multi-modal connectivity and access.

(i) 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 (portions of 4th Street, 5th Street, 6th Street, Alameda Street, and Central Avenue are part of the HIN) for potential safety enhancements the City's Vision Zero initiative. Therefore, the Project or the Flexibility Option would not conflict with the implementation of Vision Zero.

[19] Seaton Street is designated as an Industrial Collector per BOE.

(b) Central City North Community Plan

The Project Site is located within the Central City North Community Plan area. The Project would be consistent with Objective 12-1 of the Community Plan to pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips. The Project would incorporate TDM measures as project features, including reduced parking supply and bicycle parking. With the inclusion of these features, the Project would be below the daily per capita household and employee VMT thresholds.

(c) 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 180 bicycle spaces. 17 short-term bicycle parking spaces for the commercial uses and 14 short-term spaces for the live/work uses would be located near the eastern perimeter on the ground floor of the Project. 129 long-term bicycle parking spaces for the commercial uses and 130 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 5th Street and Seaton Street, which are designated as an Avenue II and an Industrial 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 Project Design Features PDF TR-2, 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 or the Flexibility Option would not conflict with applicable City ordinances.

(d) Other Programs, Plan, 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 2020-2045 RTP/SCS, the City of Los Angeles General Plan Framework, and the Citywide and Downtown Design Guidelines all contain goals and policies applicable to transportation and, in some cases, land use projects. For the reasons explained in **Section IV.G, Land Use**, of this Draft EIR, Project operation impacts were determined to be less than significant since they would not conflict with those programs, plans, ordinances, and policies.

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 2,750 daily vehicle trips.
- The estimated daily household VMT per capita for the Project's residential land use component is 3.7 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 7.0 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee.

It is noted that, consistent with the methodology of the LADOT VMT Calculator, Project VMT reflects TDM measures, including reduced parking supply and bicycle parking.

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 expected to result in less than significant daily VMT impacts.**

(b) Flexibility Option

Under the Flexibility Option, the commercial square footage provided would be increased to 64,313 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 200 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 2,797 daily vehicle trips.

- The estimated daily household VMT per capita for the Flexibility Option's residential land use component is 3.6 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 7.0 daily work VMT per employee, which is less than the Central APC significance threshold of 7.6 VMT per employee.

Similar to the Project, the Flexibility Option VMT reflects TDM measures, including reduced parking supply and bicycle parking.

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 expected to result in a less than significant daily VMT impacts.**

(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 the Flexibility Option, impacts related to a significant VMT impact 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 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.**

(b) 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.**

(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 are considered to 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 had 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**.

(b) Operation

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including Seaton Street and 5th 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**.

See also **Section IV.J, 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. Furthermore, by increasing the intensity of use of transit facilities there would be an over decrease of use of single-occupancy vehicles, thereby, helping to reduce the energy and emission footprint of the Project and promoting transportation 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 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) 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 goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the 2020-2045 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 2020-2045 RTP/SCS.

Therefore, based on the above project-related VMT analysis (i.e., which concludes that the Project falls 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 2020-2045 RTP/SCS), no cumulative VMT impacts are anticipated. Therefore, the Project and Flexibility Option's cumulative VMT impact can be deemed 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 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.[20] 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

[20] California Vehicle Code, Section 21806.

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.