IV. Environmental Impact Analysis
I. Transportation

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on transportation/traffic. This section is based on the *2143 Violet Street Project Draft Transportation Impact Analysis* dated February 2020 (Transportation Study) prepared by Fehr & Peers and provided in Appendix N.1 of this Draft EIR. The Transportation Study follows the Los Angeles Department of Transportation (LADOT) *Transportation Assessment Guidelines (TAG) dated* July 2019, which provides the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation impact study.

The scope of analysis for the Transportation Study was developed in consultation with LADOT staff. The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were outlined in a Memorandum of Understanding (MOU) dated October 2019, which was reviewed and approved by LADOT. A copy of the MOU is provided in Appendix A of the Transportation Study. LADOT also reviewed and approved the Transportation Study on April 28, 2020. A copy of LADOT's Assessment Letter is included as Appendix N.2 of this Draft EIR.

On September 27, 2013, Governor Edmund G. "Jerry" Brown signed Senate Bill (SB) 743, which went into effect in January 2014, directed the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (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 automobile delay, level of service (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 had been released 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 vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines and the updated guidelines became effective on December 28, 2018. The City of Los Angeles adopted the updated guidelines on May 2, 2019.

Based on these changes, on July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

Additionally, on August 9, 2019, LADOT issued guidance on the implementation of the state mandated analysis of VMT:

> *On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines…. To manage this transition LADOT will honor executed MOUs for traffic studies that were processed under the prior LOS-based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects.*

SB 743 also adds Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment

center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."[1] A "transit priority area" is defined as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."[2] PRC Section 21064.3 defines "major transit stop" 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."[3] PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.[4]

The Project proposes the construction of a mixed-use residential development consisting of 347 new live-work units, and approximately 187,374 square feet of new office space, 21,858 square feet of new commercial floor area, and a 926 square-foot community room that residents could use for art creation. Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations, including Pershing Square and 7th Street/Metro Center. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, which is the closest bus stop approximately 200 feet west of the Project Site. Other nearby transit lines include Metro Local Line 18, which provides service east/west from the City of Montebello to the Wilshire Center area, and Metro Local Line 62, which provides service from Downtown Los Angeles, east to Santa Fe Springs, and south to Hawaiian Gardens. A bus stop for Local Lines 18, 60, and 62 is located at 7th Street and Santa Fe Avenue, approximately 700 feet northwest of the Project Site. Additionally, the Greyhound Bus Terminal is located approximately 0.4 mile northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles. Therefore, the Project is located in a transit priority area as defined in PRC Section 21099 and confirmed by the City of Los Angeles Zone Information Map Access System (ZIMAS).[5] As such, the Project's parking impacts shall not be considered

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[1] *PRC Section 21099(d)(1).*

[2] *PRC Section 21099(a)(7).*

[3] *PRC Section 21064.3.*

[4] *PRC Section 21099(a)(4).*

[5] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, http://zimas.lacity.org/, accessed June 6, 2019. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place.*

significant impacts on the environment pursuant to PRC Section 21099. Notwithstanding the provisions of PRC Section 21099, the Project must comply with the vehicle and bicycle parking standards of the Los Angeles Municipal Code (LAMC). Therefore, an analysis of parking is provided below for informational purposes.

2. Environmental Setting

a. Regulatory Framework

(1) CEQA Guidelines Section 15064.3

As discussed above, recent changes to CEQA 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 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.[6] Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.[7] 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.[8] A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence.[9] As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (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 CEQA Guidelines Section 15064.3 and the TAG.

(2) Congestion Management Program

The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows

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6 *CEQA Guidelines Section 15064.3(b)(1)*

7 *CEQA Guidelines Section 15064.3(b)(1)*

8 *CEQA Guidelines Section 15064.3(b)(4)*

9 *CEQA Guidelines Section 15064.3(b)(4)*

counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

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

(3) Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

In April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016 RTP/SCS presents a long-term vision for the region's transportation system through the year 2040 and identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. As stated in the 2016–2040 RTP/SCS, SB 375 requires SCAG and other Metropolitan Planning Organizations (MPOs) throughout the state to develop a Sustainable Communities Strategy to reduce per capita GHG emissions through integrated transportation, land use, housing, and environmental planning.[10] Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[11] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.[12]

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[10] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 166.*

[11] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 189.*

[12] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, p. 76.*

(4) City of Los Angeles General Plan Framework Element (Transportation Chapter) and Mobility Plan 2035

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. The goals, objectives, policies, and related implementation programs of the Framework Element's Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999.

As an update to the Transportation Element of the General Plan, the City Council initially adopted Mobility Plan 2035: An Element of the General Plan (Mobility Plan) in August 2015. The City Council readopted the Mobility Plan in January 2016 and again in September 2016 upon consideration of additional amendments.[13] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets.[14] 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. Refer to Section IV.F, Land Use, of this Draft EIR for a discussion of the Project's consistency with the Mobility Plan.

Street classifications are designated in the Transportation Element of the City of Los Angeles General Plan. The Mobility Plan has modified the street standards contained in the Transportation Element in an effort to create a better balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Roadways are now defined as follows in the Mobility Plan:

- Freeways—High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.

- Arterial Streets—Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:

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[13] *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.*

[14] *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*

- Boulevards represent the widest streets that typically provide regional access to major destinations and include two categories:
    - Boulevard I provide up to four travel lanes in each direction with a target operating speed of 40 miles per hour (mph).
    - Boulevard II provide up to three travel lanes in each direction with a target operating speed of 35 mph.
- Avenues pass through both residential and commercial areas and include three categories:
    - Avenue I provide up to two travel lanes in each direction with a target operating speed of 35 mph.
    - Avenue II provide up to two travel lanes in each direction with a target operating speed of 30 mph.
    - Avenue III provide up to two travel lanes in each direction with a target operating speed of 25 mph.

- 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. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.
- Local Streets—Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. Local streets can be:
    - 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 designates a network of bicycle lanes (Tier 1, Tier 2, and Tier 3) and bicycle paths in the Project area. Tier 1 Bicycle Lanes are bicycle facilities on arterial roadways with physical separation. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped separation. Bicycle Paths are facilities outside of the roadway. Bicycle Routes are identified routes for bicycles that are often painted with "sharrow" symbols to alert drivers to bicyclists sharing the roadways. There are no existing bicycle facilities within 0.5 mile of the Project Site. However, the Mobility Plan identifies Mateo Street and Santa Fe Avenue as part of the Neighborhood Enhanced Network. The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets with bicycle facilities. The Los Angeles River Bike Path from Elysian Park to Maywood via the Downtown/Arts

district is also planned to provide more access to the Los Angeles River. Mateo Street, Mission Road, and 7th Street are part of the Tier 1 Bike Lane Network.

(5) Central City North Community Plan

The Central City North Community Plan (Community Plan) was adopted in 2000 and amended in 2016 as part of the Mobility Plan 2035 Update. While an updated Community Plan is currently under development, the plan from 2016 is currently in effect. The Community Plan includes transportation-related objectives, policies, and programs in Chapter III, Land Use Plan Policies and Programs. These objectives, policies, and programs, as well as design policies included in the Urban Design chapter, are focused on enhancing the pedestrian environment and reducing VMT.

Additionally, a Transportation Improvement and Mitigation Plan (TIMP), was prepared for the Community Plan through an analysis of the land use impacts on transportation. The TIMP establishes a program of specific measures which are recommended to be undertaken during the life of the Community Plan.

(6) Vision Zero

LADOT is implementing a program called Vision Zero. Vision Zero Los Angeles 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 identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network is comprised of 386 corridors that represent 6 percent of the City's street miles. Approximately 65 percent of all deaths and severe injuries involving people walking and biking occur on these 6 percent of streets. Streets in the immediate vicinity of the Project Site that are located on the High Injury Network are as follows:

- 6th Street
- 7th Street
- Olympic Boulevard

The locations of these streets are shown in Figure II-1 in Section II, Project Description, of this Draft EIR.

(7) Los Angeles Municipal Code

With regard to construction traffic, Section 41.40 of the LAMC 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.

In addition, LAMC Section 12.37 states that no building or structure shall be erected or enlarged, and no building permit shall be issued therefor, on any lot in an R3 or less restrictive zone; or in any lot in the RD1.5, RD2, or RD3 zones; if the lot abuts a major or secondary highway or collector street unless one half of the street has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

(8) Transit Oriented Community Guidelines

Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22.A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program to encourage affordable housing near transit. The TOC Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program. TOC incentive areas are tiered based on a project site's distance from transit and the type of transit. The Project Site is located in a Tier 3 TOC area per ZIMAS.

(9) LADOT Manual of Policies and Procedures Section 321

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

b. Existing Street Systems

The existing street system in the study area consists of freeways, arterials, collector, and local streets, which provide regional, sub-regional, and local access and circulation within the study area. The existing street system and transit network is shown in Figure IV.I-1 on page IV.I-10.

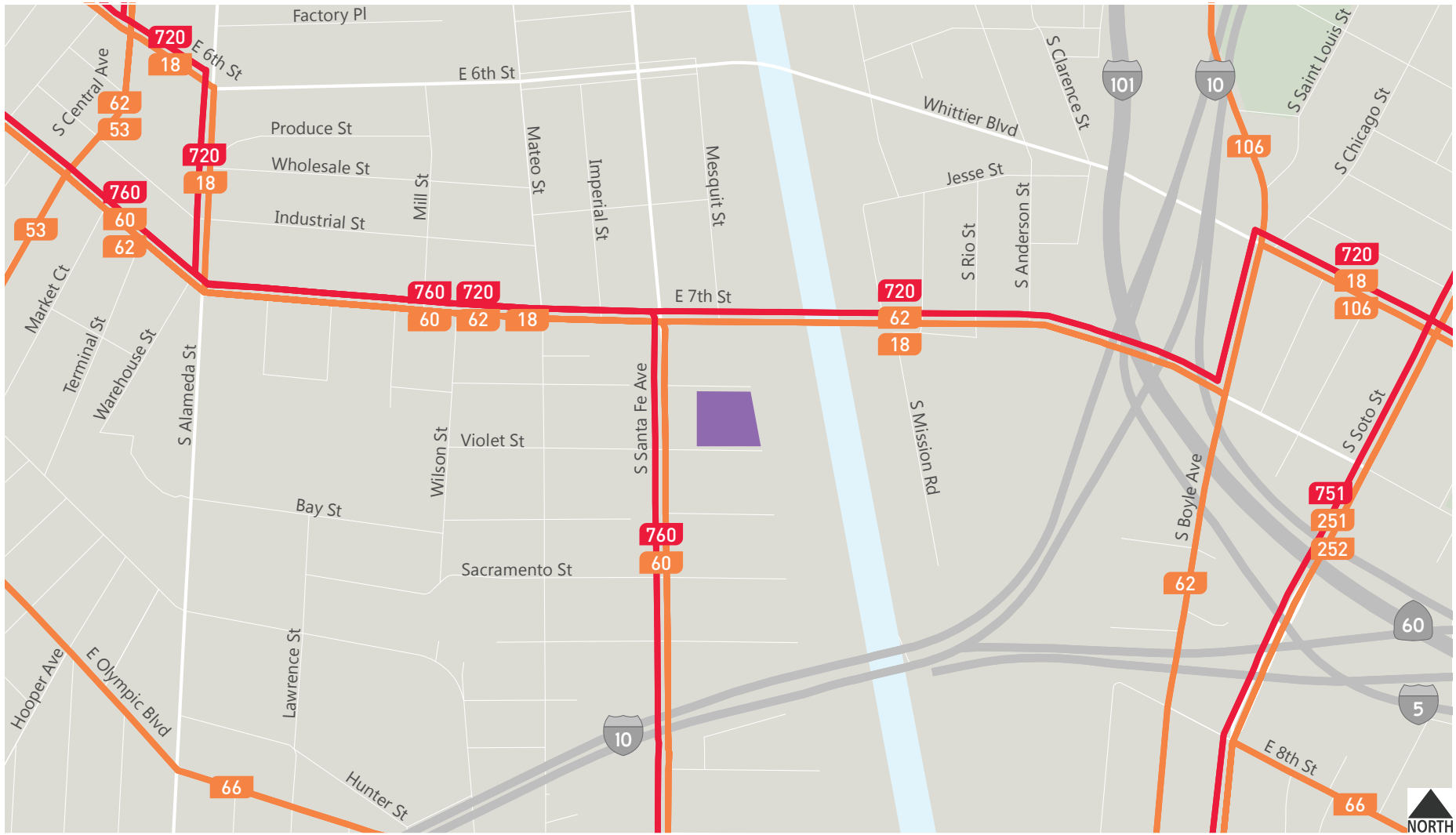

Figure IV.I-1
Existing Street System and Transit Network

Source: Fehr & Peers, 2020.

(1) Freeways

The Project Site is located in the Arts District area of downtown Los Angeles. The Project area is served by an extensive freeway network. Primary regional access to the Project area is provided by the Santa Monica Freeway (I-10), the Hollywood Freeway (US-101), the Golden State Freeway (I-5), and the Pomona Freeway (SR-60), which are accessible within 0.5 mile of the Project Site. Each of these freeways are described below and provide regional access to and from the study area and connect with each other via the East Los Angeles Interchange:

- I-5 runs in the north/south direction and extends from San Diego, through the East Los Angeles Interchange, and north to the rest of California, Oregon, and Washington. In the vicinity of the study area, the freeway provides two to five lanes in each direction. Access is provided at Mateo Street/Santa Fe Avenue via I-10, 7th Street, and Soto Street.

- I-10 runs in an east/west direction and extends from the Pacific Ocean eastward through Los Angeles County and beyond. In the vicinity of the study area, the freeway provides two to five lanes in each direction. Access is provided at Alameda Street, Mateo Street/Santa Fe Avenue, Soto Street, and Boyle Avenue. I-10 shares an alignment with I-5 and runs north/south between the East Los Angeles Interchange and the I-5/I-10 interchange near LA County/USC Medical Center.

- SR-60 runs in an east/west direction and extends from the East Los Angeles Interchange to Riverside County. In the vicinity of the study area, the freeway provides four to five lanes in each direction. Access is provided at Soto Street, Mateo Street/Santa Fe Avenue via I-10, and other ramps via US-101 and I-5/ I-10.

- US-101 runs in the southeast/northwest direction, extending from the East Los Angeles Interchange through Hollywood, the San Fernando Valley and beyond. In the vicinity of the study area, the Hollywood freeway provides three lanes in each direction. Access is provided at Whittier Boulevard, 7th Street, Soto Street, and other ramps via I-5/SR-60.

(2) Streets

The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain hazardous geometric design features, such as sharp curves or dangerous intersections. Listed below are the primary streets that provide local access to the Project Site.

(a) North-South Streets

- Central Avenue—Central Avenue is designated as an Avenue I that runs west of the Project Site with two travel lanes in each direction. Left-turn pockets are present at many major intersections. Parking is permitted on both sides of the street along most of the corridor. Central Avenue is on both the Bicycle and Transit Enhanced Networks.

- Alameda Street—Alameda Street is designated as an Avenue I that runs west of the Project Site with two lanes in each direction. Parking is permitted on both sides of the street along some parts of the corridor. In the study area, Alameda Street is part of the Vehicle Enhanced Network.

- Mateo Street—Mateo Street is designated as an Avenue III that runs west of the Project Site with one travel lane in each direction. Parking is permitted on both sides of the street. Left-turn pockets are not present at any major intersection. Mateo Street is part of the Neighborhood Enhanced Network.

- Santa Fe Avenue—Santa Fe Avenue is designated as an Avenue II that runs west of the Project Site with two lanes in each direction south of 7th Street. North of 7th Street, Santa Fe Avenue has one lane in each direction. Parking is available on both sides or on one side of the street along most parts of the corridor. Santa Fe Avenue is part of the Neighborhood Enhanced Network.

- Boyle Avenue—Boyle Avenue is designated as an Avenue II and provides two lanes in each direction. Parking is permitted on both sides of the street in most sections. North of 6th Street, Boyle Avenue is part of the Neighborhood Enhanced Network.

- Soto Street—Soto Street is designated as an Avenue II north of the East Los Angeles Interchange with two lanes in each direction that runs east of the Project Site. South of the interchange, Soto Street is designated as an Avenue I, with two to three lanes in each direction. There is no street parking south of the interchange, but there is parking on both sides of the street north of the interchange. North of 6th Street, Soto Street is part of the Bicycle Enhanced Network.

(b) East-West Streets

- 7th Street—7th Street is designated as an Avenue II that runs north of the Project Site and has two lanes in each direction east of Main Street. Parking is generally permitted on both sides of the street and left-turn pockets are present at major intersections. 7th Street runs east of Santa Fe Avenue via the 7th Street Bridge to Boyle Heights. 7th Street is part of the Bicycle Enhanced Network.

- 6th Street/Whittier Boulevard—6th Street and Whittier Boulevard both carry Avenue II designations and lie north of the Project Site. 6th Street is a one-way street west of Central Avenue and has three to four eastbound lanes during rush hours. East of Central Avenue, 6th Street runs two-way with two lanes in each direction. 6th Street crosses the Los Angeles River east of Mateo Street as the 6th Street Viaduct, which is currently under reconstruction. The new bridge is expected to be open to traffic in year 2020. East of the Los Angeles River, the corridor continues as Whittier Boulevard, which will have two lanes in each direction once the new bridge is completed. 6th Street and Whittier Boulevard are both parts of the Transit and Bicycle Enhanced Networks.

- Olympic Boulevard—Olympic Boulevard is designated as an Avenue I and runs south of the Project Site with two travel lanes in each direction. Left-turn pockets are present at major intersections. Olympic is on the Transit Enhanced Network.

- Bay Street—Bay Street is a discontinuous two-lane Collector Street connecting with Alameda Street but not with Santa Fe Avenue. Parking is permitted on both sides of the street.

- 15th Street—West of Santa Fe Avenue, 15th Street is designated as an Avenue II and provides two travel lanes with parking on both sides. East of Santa Fe Avenue, 15th Street connects to Washington Boulevard and is designated as a Collector Street. This section provides four travel lanes with no street parking.

(3) Regional Transportation System

(a) Freeways

As discussed above, primary regional access to the Project area is provided by I-10, US-101, I-5, and SR-60, which are accessible within 0.5 mile of the Project Site.

(b) Transit System

The Project Site is served by a number of public transit lines. The Project is located approximately 1.5 miles south of the Metro Gold Line Little Tokyo/Arts District Station and the Metro Gold Line Pico/Aliso Station. In addition, the Project Site is located approximately 2 miles east of the Metro Blue/Expo/Red/Purple Lines 7th Street/Metro Center Station and the Metro Blue Line Washington Station. Three Metro Local bus routes run within 0.25 mile of the Project Site. Metro Local Route 60 runs on 7th Street and Santa Fe Avenue, while Metro Local Routes 18 and 62 run on 7th Street and Whittier Boulevard. Metro Rapid Routes 720 and 760 run on 7th Street and Santa Fe Avenue, but no Rapid Bus stops are located within 0.5 mile of the Project Site. Existing transit services in the study area are shown in Figure IV.I-1 on page IV.I-10. The Project Site is not located along any streets identified in the Mobility Plan's Transit Enhanced Network.

c. Existing Project Site Conditions

The Project Site includes surface parking areas generally located on the southern half of the Project Site. Vehicular access at the Project Site is currently provided at driveways along Violet Street, 7th Place, and a public alley that abuts the Project Site to the west.

d. Existing Pedestrian and Bicycle Facilities

(1) Pedestrian Facilities

Several streets in the study area are included within the planned Neighborhood Enhanced Network, including Mateo Street and Santa Fe Avenue. The study area generally has a patchwork of pedestrian facilities, including sidewalks and accessible curb ramps. Major streets, such as Mateo Street, Santa Fe Avenue, 7th Street, and 6th Street, typically have more pedestrian facilities than other minor streets. Many areas and streets in the Project area lack curbs, sidewalks, and accessible ramps due to the industrial nature of the area. The Project Site is not located within a Pedestrian Enhanced District per the Mobility Plan.

(2) Bicycle Facilities

As discussed above, there are currently no existing bicycle facilities within 0.5 mile of the Project Site. The Project Site is not located along any streets identified in the Mobility Plan's Bicycle Enhanced Network.

e. Future Traffic Context

(1) Related Projects

The Transportation Study also considers the effects of other development proposals (related projects) either proposed, approved, or under construction near the Project Site. The list of related projects was compiled based on information obtained from the Department of City Planning and LADOT, as well as recent studies of projects in the area. A total of 74 related development projects were identified in the vicinity of the Project Site, as shown in Figure III-1 and listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. Although the buildout years of many of these related projects are uncertain and may well be beyond the Project's buildout year, and notwithstanding that some may not be approved or developed, all related projects were considered.

(2) Future Base Transportation System Improvements

(a) Future Roadway Improvements

The 6th Street Viaduct is currently being reconstructed with completion expected later in 2020. The new 6th Street Viaduct is expected to have the same number of lanes as the previous bridge, and intersections along the approach will keep the same configurations as before. Enhancements to pedestrian and bicycle facilities will be included, with dedicated bicycle lanes and wider sidewalks.

In association with the reconstruction of the 6th Street Viaduct, public park space will be included along and adjacent to the reconstructed bridge. New public park space along the western approach of the reconstructed bridge will result in the closure of Mesquit Street where it previously served as a one-way westbound frontage road parallel to the bridge. The future Mesquit Street as it approaches the reconstructed bridge northbound will use the alignment of the southern frontage road and terminate at Santa Fe Avenue. The existing one-way eastbound frontage road will remain as-is from Mateo Street to Santa Fe Avenue.

(b) Mobility Plan 2035

In the Mobility Plan, the City identifies key corridors of mobility-enhanced networks. Specific improvements in such networks have not yet been identified, and no schedule for implementation has been made available. As such, there have been no changes to vehicular lane configurations as a result of the Mobility Plan. However, as described above in Subsection 2.c.(2), the Transportation Study provides a list of the corridors identified as part of the mobility-enhanced networks.

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

Threshold (d): Result in inadequate emergency access

As previously discussed, SB 743 (PRC Section 21099(b)(1)) directed OPR to prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within TPAs. The revised guidelines are required to prohibit the consideration of automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, new CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." As noted above, on July 30, 2019, the City adopted VMT as a criterion in determining transportation impacts under CEQA and LADOT issued guidance on August 9, 2019.

For this analysis the Appendix G Thresholds provided above are relied upon.

The methodology and base assumptions used in this analysis were established by LADOT.

b. Methodology

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

As discussed above, with implementation of SB 743, the updated Appendix G thresholds, and the City's revised guidance on thresholds of significance for transportation impacts under CEQA, vehicle delay is not considered a potential significant impact on the environment. As such, this analysis will not go into detail on the anticipated effect of the Project with respect to LOS. As described above, CEQA Guidelines threshold (a) has been updated to require an analysis of the proposed Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter. In accordance with the TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent.

(2) Vehicle Miles Traveled

(a) VMT Impact Thresholds

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.[15] The TAG identifies significance thresholds to apply to development projects when evaluating potential VMT impacts consistent with the OPR's CEQA guidance.

As discussed above, SB 743, which went into effect in January 2014, required OPR to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic LOS, to a new measurement that better addresses the state's goals on reduction of GHG emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. In accordance with SB 743, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted the TAG in July 2019.

The City's VMT impact criteria for development projects is specified in Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

For residential projects, a development project may have a potential significant impact if it generates household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. The Project is located in the Central APC and the corresponding threshold is 6.0 daily household VMT per capita. This criterion was used for the multifamily residential component of the Project.

For office projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work

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[15] *OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.*

VMT per employee for the APC in which the project is located. The Project is located in the Central APC and the corresponding threshold is 7.6 daily VMT per employee. This criterion was used for the office component of the Project.

Per the TAG, if a project includes less than 50,000 square feet of retail uses (including restaurants), then such retail uses are deemed to be small-scale or local-serving and are assumed to have less than significant VMT impacts.[16] Local-serving retail development, tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT.[17] The proposed high-turnover restaurant space is less than 50,000 square feet and is therefore considered to be local-serving under the TAG. Accordingly, per the TAG, VMT impacts from this portion of the Project would be less than significant.[18] This criterion was used for the restaurant component of the Project.

For mixed-use projects, evaluate each component separately and apply the impact criteria above for each individual land use.

Per the TAG, a project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the 2016-2040 RTP/SCS in terms of development location, density, and intensity.

(b) VMT Analysis Methodology

LADOT developed City of Los Angeles VMT Calculator Version 1.2 (November 2019) (VMT Calculator) to assess the VMT impacts of proposed development projects within the City. The VMT Calculator also assesses the effectiveness of selected Transportation Demand Management (TDM) measures proposed for a project based on available research. Analysis was conducted for the Project using the City's VMT analysis procedures and the VMT Calculator. This analysis considered both the Project's proposed land uses and the TDM program proposed as mitigation.

(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

[16] *LADOT, Transportation Assessment Guidelines, July 2019, p. 16.*

[17] *LADOT, Transportation Assessment Guidelines, July 2019, p. 19.*

[18] *LADOT, Transportation Assessment Guidelines, July 2019, p. 16.*

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

(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 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 United States Department of Energy, and other modeling resources.[19] 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 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).

[19] *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.*

(3) Hazardous Design Features

The TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result are considered. 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

In consultation with the Los Angeles Fire Department (LAFD), the analysis of the Project's potential access impacts will include a review of the proposed vehicle access points and internal circulation. A determination was made pursuant to the thresholds of significance identified above regarding the potential for these features of the Project to impede traffic flows on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following Project design feature, which is relevant to the assessment of construction traffic impacts and impacts related to bicycle, pedestrian, and vehicular safety:

TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;

- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project Site; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.

In addition, several TDM program elements are already included in the Project. These elements, which would be expected to enhance the usage of walking, biking, and transit modes as alternatives to the automobile, include the following:

- Bicycle Amenities—The Project will provide long-term and short-term bicycle parking, bicycle showers, and secure bicycle parking in accordance with LAMC requirements. In addition, the Project may also provide complimentary amenities such as a self-service bike repair area.
- Site Design—The Project Site will be designed to encourage walking, biking, and taking transit. Amenities would include:
  - New sidewalks and street trees along the perimeter;
  - Improved street and pedestrian lighting; and
  - A pedestrian network within the Project Site and connecting to the surrounding pedestrian system

d. Analysis of Project Impacts

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

(1) Impact Analysis

Table 2.1-2 in the TAG provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: Mobility Plan policies 2.1, 2.3, 2.4, 2.10, 2.17, 3.2, 3.5, 3.8, 3.9, 3.10, 4.1, 4.13, 5.1, 5.4, and 5.5; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs ENG.9, ENG.19, PK.1, PK.7, PK.8, PL.1, PL.13, and PS.3; Mobility Plan Chapter 3 Access for All; Transit Oriented Community Guidelines; and LADOT MPP Section 321. In addition, an

analysis of the Central City North Community Plan is also provided. The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

(a) Mobility Plan 2035

(i) Mobility Plan Policies

Policy 2.1 Adaptive Reuse of Streets—Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands: The Project will not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future changes by various City departments. Therefore, the Project would not conflict with Mobility Plan Policy 2.1.

Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment: As discussed above, the Project is not located in a Pedestrian Enhanced District, but the Project would improve pedestrian infrastructure with the addition of new sidewalks around the Project Site perimeter, pedestrian lighting, and a paseo within the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets: The Project frontages are not on streets that are part of the Neighborhood Enhanced Network. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: The Project proposes curbside passenger loading zones along Violet Street, which is a cul-de-sac east of the intersection of Violet Street and Santa Fe Avenue. As such, passenger loading activity would likely have a minimal impact on the surrounding street network. The Project also proposes a loading dock for residential uses off of the alleyway and a loading dock for the office and restaurant uses immediately adjacent to the office parking entrance. The loading docks would be accessed on the Project Site, which would result in a minimal impact on the surrounding street network and the loading docks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension: While this is a citywide policy that does not apply directly to the Project, the Project would not conflict with its

implementation. The Project is dedicating three feet of right-of-way along the Violet Street and 7th Place frontages to conform with the street classifications in the Mobility Plan, but no street widening is proposed. Therefore, the Project would not conflict with Mobility Plan Policy 2.17.

Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way: There are no pedestrian sidewalks along Violet Street between the Project Site and Santa Fe Avenue, and the adjacent parcel currently utilizes this area for parking. However, the Project proposes to add new Americans with Disabilities Act (ADA)-compliant sidewalks along the perimeter of the Project. The Project would not inhibit the future ability of the adjacent parcel or the City to provide sidewalks along the adjacent parcel's frontage. Therefore, the Project would not conflict with Mobility Plan Policy 3.2.

Policy 3.5 Multi-Modal Features—Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders: The Project Site does not include a transit station or bus stop. Nevertheless, the Project would support multi-modal travel with bicycle amenities such as bicycle parking and a self-service bicycle repair area, as well as pedestrian amenities such as the addition of new sidewalks and a paseo within the Project Site. Therefore, the Project would not conflict with Mobility Plan Policy 3.5.

Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities: The Project will provide short- and long-term bicycle parking in accordance with LAMC requirements. Specifically, the Project is required to provide and would provide 47 short-term bicycle parking spaces and 210 long-term bicycle parking spaces. Therefore, the Project would not conflict with Mobility Plan Policy 3.8.

Policy 3.9 Increased Network Access—Discourage the vacation of public rights-of-way: The Project Site is adjacent to an alley located along its western edge. The Project will not restrict alley access, proposes to dedicate 2.5 feet along the alley, and proposes a full-access residential driveway off of the alley. The Project does not propose vacation of the alley. Therefore, the Project would not conflict with Mobility Plan Policy 3.9.

Policy 3.10 Cul-de-sacs—Discourage the use of cul-de-sacs that do not provide access for active transportation options: The Project Site is located on Violet Street, which is a cul-de-sac east of the intersection of Violet Street and Santa Fe Avenue. The current cul-de-sac cannot provide bicycle and pedestrian access due to the railroad tracks located east of the Project Site; the Project would not modify this cul-de-sac and no new cul-de-sacs are proposed. Therefore, the Project would not conflict with Mobility Plan Policy 3.10.

Policy 4.1 New Technologies—Support new technology systems and infrastructure to expand access to transportation choices: The Project does not propose elements that would limit or preclude the City's ability to offer or introduce new technology systems or infrastructure. Therefore, the Project would not conflict with Mobility Plan Policy 4.1.

Policy 4.13 Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives: The Project would provide subterranean parking within the Project Site. The Project is required to provide and would provide 759 vehicle parking spaces, which is reduced from 817 due to the provision of bicycle parking spaces. The Project will also implement TDM program, as discussed further under Threshold (b), below. This program is intended to reduce vehicle trips and would include unbundled residential parking, which lowers the cost of purchasing or renting a dwelling unit and can function as an incentive to minimize auto ownership. Therefore, the Project would not conflict with Mobility Plan Policy 4.13.

Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health: As discussed above in the analyses for Policies 3.5 and 3.8, the Project would encourage the development of a sustainable transportation system with its provision of bicycle parking, self-service bicycle parking area, addition of new sidewalks, and pedestrian paseo. Therefore, the Project would not conflict with Policy 5.1.

Policy 5.4 Clean Fuels and Vehicles—Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure: While this is a citywide policy that does not apply directly to the Project, the Project would not conflict with its implementation. As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with the City's EV charging requirements which specify that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV "ready" meaning they will be capable of supporting future EV charging equipment. Therefore, the Project would not conflict with Mobility Plan Policy 5.4.

(ii) Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above, the Project Site is not located within a Pedestrian Enhanced District or along a Transit Enhanced Network or Bicycle Enhanced Network. Nevertheless, as discussed above in the analyses for Policies 2.3 and 3.8, the Project would encourage pedestrian and bicycle activity. With respect to transit, the Project is located within walking distance of multiple bus stops and approximately 1.5 miles south of the Metro Gold Line Little Tokyo/Arts District Station and the Metro Gold Line Pico/Aliso Station. In addition, Metro is evaluating the West Santa Ana Branch Transit Corridor which will connect

Downtown Los Angeles to southeast Los Angeles County via a new light rail line.[20] Current proposals include a station in the Arts District, located near the intersection of Alameda Street and 7th Street, approximately 0.5 mile northwest of the Project Site. Given the distance between the Project Site and the proposed rail line and station, Project construction would not interfere with its development. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

(iii) Mobility Plan Programs

Mobility Plan Program ENG.9 directs the city to continue the Green Alleys program to introduce low-impact development stormwater features and improve the overall quality and safety of neighborhood alleys. The Project does not propose any features that would preclude the City from adding green elements to the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Program ENG.9.

Mobility Plan Program ENG.19 discusses first/last mile improvements near transit stops that could include measures such as landscaping, lighting, signage, and midblock crosswalks, among other options. The Project would contribute to first/last mile enhancements with bicycle parking and the addition of new sidewalks. Therefore, the Project would not conflict with Mobility Plan Program ENG.19.

Mobility Plan Program PK.1 directs the Department of City Planning, LADOT, and council offices to work with communities, businesses, and organizations to identify and implement creative strategies to resolve parking conflicts in areas with high parking demand, which currently do not include the Arts District. Based on LAMC requirements for the proposed land uses and existing uses to remain, the Project would be required to provide 783 vehicle parking spaces and the Project would provide 828 vehicle parking spaces located within six subterranean parking levels. Therefore, the Project would not conflict with Mobility Plan Program PK.1.

Mobility Plan Program PK.7 requires off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings undergoing extensive renovations and/or expansion whenever practical in non-industrial areas. While the Arts District is an industrial area, as discussed above in the analysis for Policy 2.10, the Project would provide a loading dock off the alleyway and a loading dock for the office and restaurant uses immediately adjacent to the office parking entrance. The loading docks will

[20] *Metro, West Santa Ana Branch Transit Corridor, www.metro.net/projects/west-santa-ana/, accessed April 20, 2020.*

not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Program PK.7.

Mobility Plan Program PK.8 encourages the designation of on-street loading areas, through removal of curb parking, in established industrial areas where off-street loading facilities are lacking. As discussed above in the analysis for Policy 2.10 and Program PK.7, the Project's loading docks would be located within the Project Site and will not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Program PK.8.

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. The proposed residential driveway is located in the alleyway and the commercial driveway is located on Violet Street, which is a collector street. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PL.13 is a citywide program to explore the use of special materials use within public rights-of-way. This program does not apply to the Project because no changes to the adjacent rights-of-way are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Program PL.13.

Mobility Plan Program PS.3 is a citywide program to explore the development of a connected network of walking passageways utilizing both public and private spaces, local streets, and alleyways to facilitate circulation. The Project improves pedestrian circulation by adding new sidewalks and a paseo within the Project Site. Therefore, the Project would not conflict with Mobility Plan Program PS.3.

(iv) Mobility Plan Chapter 3: Access for All

Chapter 3 of the Mobility Plan emphasizes the importance of multi-modal networks as integral components of the City's transportation system. The Project location and design are intended to leverage proximity to multiple Metro bus routes that also connect to Metro rail stations. The Project's design is providing vehicle parking, bicycle parking, improved pedestrian access, and on-site loading areas for passenger loading and deliveries. Therefore, the Project would not conflict with Mobility Plan Chapter 3.

(b) Transit Oriented Community Guidelines

The Transit Oriented Community (TOC) Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC program. While the Project Site is located in a Tier 3 TOC, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

(c) LADOT Manual of Policies and Procedures Section 321

MPP Section 321 provides the basic criteria for review of driveway designs. MPP Section 321 recommends that two-way driveways for multi-family residential developments with more than 25 spaces and commercial developments are 30 feet in width. The proposed driveways will comply with the City's applicable requirements. MPP 321 also allows up to two driveways for up to 400 feet of street frontage. The Project proposes two driveways, and thus does not propose more driveways than allowed by the City's maximum standard. Therefore, the Project would not conflict with MPP Section 321.

(d) Central City North Community Plan

(i) Policies

Policy 2-2.2 and Policy 2-3.1 New Development needs to add to and enhance the existing pedestrian street activity: The Project would add new sidewalks around the perimeter of the Project Site. Therefore, the Project would not conflict with Community Plan Policies 2-2.2 and 2-3.1.

Policy 2-2.3 and Policy 2-3.4 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses: Although the Project is not located in a pedestrian oriented district, the Project proposes commercial uses for the ground floor of the building. Therefore, the Project would not conflict with Community Plan Policies 2-2.3 and 2-3.4.

Policy 12-1.1 Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.). As discussed further below, Mitigation Measure TR-MM-1 requires the development of a TDM Program for the Project. Specific strategies included for the Project's office component include a required commute trip reduction program and promotions and marketing regarding alternative modes of transportation. Therefore, the Project would not conflict with Policy 12-1.1.

Policy 12-1.3 Require that proposals for new non-residential development projects included submission of a TDM Plan to the City. As discussed above under Policy 12-1.1, Mitigation Measure TR-MM-1 requires the development of a TDM Program for the Project. The final TDM program will be approved by LADOT prior to the City's issuance of a certificate of occupancy for the Project. Therefore, the Project would not conflict with Policy 12-1.3.

Policy 12-1.4 TDM measures in Central City North should be consistent with adopted City policy. One of the TDM strategies recommended for the Community Plan

area aims to limit vehicle trip generation for new development by requiring new commercial and industrial development projects to limit peak period vehicle trips to 85 percent of that forecasted for the project (i.e., as compared to trip generation rates used to determine project traffic impacts) or to achieve a 1.5 peak period Average Vehicle ridership among employees. As discussed in the Transportation Study included as Appendix N.1 of this Draft EIR, LADOT's VMT Calculator was used to quantify the potential VMT reduction for the Project due to implementation of the TDM measures proposed for the Project. The VMT Calculator incorporates research conducted by Fehr & Peers under contract to the California Air Pollution Control Officers Association (CAPCOA, 2010) and elsewhere. It considers a variety of TDM strategies and the setting in which they may apply, estimates effectiveness for each, and applies caps when appropriate (for example, simply aggregating the effectiveness of individual TDM measures can sometimes yield a result that is overestimated since more than one measure may be targeting the same trip). As shown in Table 14 in the Transportation Study, with the TDM program, the daily work VMT per employee associated with the commercial office component of the Project is estimated to be reduced by 18 percent. Therefore, the Project would not conflict with Policy 12-1.4.

Policy 13.1.4 Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places [sic]. While the Project does not propose changing rooms or showers, the Project is required to provide and would provide 47 short-term and 210 long-term bicycle parking spaces, and will also provide a self-service bike repair area. Therefore, the Project would not conflict with Policy 13.1.4.

(ii) Transportation Improvement and Mitigation Plan

Street Reclassifications: The TIMP proposes implementation a new street classification, local industrial, in the Central City North area. None of the streets along the Project frontages are classified as local industrial. Therefore, the Project would not conflict with the TIMP's street reclassification program.

Transportation Demand Management (TDM) Program: The TIMP identifies TDM programs and other improvements to enhance safety and mobility in the Community Plan area, such as encouraging the formation of Transportation Management Associations (TMA's) and the continued implementation of the Citywide TDM Ordinance. Policies 12-1.1, 12-1.3, and 12-1.4 discussed above are relevant to the Project. As discussed therein, the Project would not conflict with these policies.

(iii) Urban Design Chapter

This section addresses policies in the Urban Design Chapter of the Community Plan that are relevant to the circulation system.

A. Commercial—1. Site Planning—b requires a project to minimize the number of widths of driveways providing sole access to the rear of commercial lots. Vehicular access to the office subterranean parking would be provided via a driveway located at the southeastern corner of the Project Site along Violet Street. Therefore the Project would not conflict with A. Site Planning—1.b.

C. Multiple Residential—3. Parking Structures requires that parking structures be integrated with the design of the buildings they serve. The Project proposes a subterranean parking structure, which will maximize commercial uses on the ground floor as suggested in this policy. Therefore, the Project will not conflict with design policy C. Multiple Residential 3. Parking Structures.

(e) Other Programs, Plans, Ordinances, and Policies

The Project would not conflict with the Plan for a Healthy Los Angeles, LAMC Section 12.26J (TDM Ordinance), Walkability Checklist, or the Mobility Hub Reader's Guide. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing near transit, as well as enhancing the pedestrian environment and providing bicycle parking. As discussed in detail in Section IV.F, Land Use, and Appendix G, Land Use Tables, of this Draft EIR, the Project would not conflict with Walkability Checklist policies related to encouraging pedestrian activity and reducing VMT. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26J, as well as Mobility Hub elements, such as bicycle parking and electric vehicle infrastructure. **Therefore, the Project would not conflict with these programs, plans, ordinances, and policies.**

As discussed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

(2) Mitigation Measures

Impacts with respect to the circulation system during construction or operation of the Project would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts with respect to the circulation system were determined to be less than significant without mitigation.

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

(1) Impact Analysis

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's four land uses and their respective sizes as the primary input. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 782
- Total Employees: 837
- APC: Central
- TBZ: Suburban Center
- Maximum VMT Reduction: 20 percent

Using these assumptions, the Project is estimated to result in 5,318 daily vehicle trips and a total daily VMT of 37,176, resulting in a daily household VMT per capita of 9.3 and a daily work VMT per employee of 9.1, which exceed the thresholds for the Central APC of 6.0 and 7.6, respectively. Thus, the Project is projected to have a significant impact on both household and work VMT as estimated by the VMT calculator. Since the restaurant component of the Project is less than 50,000 square feet, it is considered to be a small-scale and local-serving retail use under the TAG screening criteria. The restaurant space is intended to serve primarily Project residents and office workers. Accordingly, per the TAG, VMT impacts from this portion of the Project would be less than significant.[21]

(2) Mitigation Measures

The following mitigation measure is proposed to address household and work VMT impacts:

Mitigation Measure TR-MM-1: The Project shall prepare a TDM program. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

[21] *LADOT, Transportation Assessment Guidelines, July 2019, p. 16.*

TDM strategies applicable for the residential component:

Unbundled Parking—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.

TDM strategies applicable for the office component:

Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work schedule program, preferential carpool parking, guaranteed ride home service, and a program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting.

TDM strategies applicable for both the office and residential components:

Promotions and Marketing—This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.

(3) Level of Significance After Mitigation

With implementation of Mitigation Measure TR-MM-1, the estimated total daily vehicle trips are projected to be reduced to 4,926 and the estimated total daily VMT reduced to 34,480. The daily work VMT per employee is estimated to be reduced by 18 percent to 7.5, which would no longer be a significant impact under the City's criteria. The daily household VMT per capita is projected to be reduced to 7.7, which is a reduction of 17 percent from the unmitigated value of 9.3 but would still constitute a significant impact under the City's criteria. Therefore, impacts would be significant and unavoidable.

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

(1) Impact Analysis

As evaluated in the Initial Study for the Project, included as Appendix A of this Draft EIR, the Project does not include hazardous geometric design features. Specifically, pedestrian access to the Project Site would be provided via new sidewalks around the perimeter and through pedestrian plazas/paseos accessible to the neighborhood. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways will intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.

With respect to driveways, the Project was analyzed with the following driveway scenario:

- Residential access via a full-access driveway accessible from the alleyway along the western edge of the Project Site; and
- Office and restaurant access via a full-access driveway at the end of Violet Street

Vehicular access to the Project Site is currently available at driveways along Violet Street, East 7th Place, and a public alley that abuts the Project Site to the west. The Project would reduce the number of driveways to two driveways. A loading dock for residential uses will be provided off the alleyway and a loading dock for the office and restaurant uses will be provided on Violet Street.

The driveways would be designed to comply with LADOT standards and would be subject to review by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable safety requirements are met. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. Additionally, 7th Street, from Vermont Avenue to Mateo Street, is part of the High Injury Network, and there are no driveways proposed on 7th Street. As a result, the Project would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project site. **Thus, impacts related to hazardous geometric design features would be less than significant, and no mitigation measures are required.**

(2) Mitigation Measures

Project-level impacts would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts would be less than significant without mitigation.

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

(1) Impact Analysis

(a) Construction

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. the nearest disaster routes to the Project Site are US-101, I-10, and I-5, which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile west of the Project Site.[22]

As discussed in Subsection 3.c.(2)(a), construction activities associated with the Project (i.e., movement of construction equipment, hauling of soil and materials, daily construction worker traffic, utility line connections, etc.) would potentially impact the public services provided by the LAFD and the LAPD in the vicinity of the Project Site, as a result of construction impacts to the surrounding roadways. As such, these short-term and temporary construction activities could temporarily increase response times for emergency vehicles along Alameda Street and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Traffic Management Plan prepared pursuant Project Design Feature TR-PDF-1, emergency access would not be impeded. The Project's Construction Management Plan would require review and approval from LADOT prior to the start of construction to ensure that adequate and safe access will remain available within and near the Project Site during construction activities. In addition, the Project would ensure that travel lanes would continue to be maintained in each direction throughout the construction period, and the scheduling of haul truck and construction worker trips outside weekday

[22] *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

peak traffic periods to the extent feasible would lessen any potential impact. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way, as well as on the City-designated disaster route along Alameda Street. As such, construction-related impacts associated with emergency access would be less than significant. Therefore, impacts to emergency access, including emergency routes, during construction of the Project would be less than significant.

(b) Operation

With regard to operation, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction Projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant would also submit a diagram of the Project Site to the LAPD's Newton Area Commanding Officer that includes access routes and any additional information that might facilitate police response, as provided in Project Design Feature POL-PDF-6. Furthermore, pursuant to California Vehicle Code (CVC) Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project.

Based on the above, impacts regarding adequate emergency access would be less than significant.

(2) Mitigation Measures

Project-level impacts would be less than significant, and no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts would be less than significant without mitigation.

e. Cumulative Impacts

(1) Impact Analysis

(a) Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

As also discussed further below, although the Project would result in a significant and unavoidable impact related to household VMT per capita, cumulative impacts would be less than significant because the Project is consistent with the 2016-2040 RTP/SCS, as discussed below in Section 3.e.(2). Similar to the Project, if any of the related projects result in a significant VMT impact, they would be required to mitigate such impacts through a TDM program to reduce VMT. Therefore, if there was a cumulative impact as a result of the related projects having significant and unavoidable VMT impacts, the Project's contribution would not be cumulative considerable.

Impacts to pedestrian and bicycle facilities are largely project-specific, and as discussed above, Project impacts would be less than significant. 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 pedestrian and bicycle facilities.

With respect to transit, as discussed above, the Project would not conflict with the Mobility Plan's Transit Enhanced Network or policies encouraging the use of public transit.

Thus, Project 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.

(b) Vehicle Miles Traveled

As discussed in the TAG, long-term or cumulative effects are determined through a consistency check with SCAG's 2016-2040 RTP/SCS and projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of the RTP/SCS. While the Project is projected to have a significant and unavoidable household VMT impact, given its location in a dense area of the City of Los Angeles served by public transit, the mixed-use nature of the Project, its

provision of features to encourage walking and bicycling, and the TDM program required by Mitigation Measure TR-MM-1, the Project would be consistent with the applicable goals and objectives of the 2016-2040 RTP/SCS to locate jobs and housing in infill locations served by public transportation and facilitating active transportation and TDM (refer to Section IV.C, Greenhouse Gas Emissions, and Section IV.F, Land Use, of this Draft EIR for more detailed consistency analyses). **Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of the 2016–2040 RTP/SCS and, as a result, the Project's contribution to cumulative impacts would not be cumulatively considerable. Thus, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

(c) Hazardous Geometric Design Features

As previously discussed, the block containing the Project Site and in the overall study area are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. Any modifications to the street system proposed as part of the Project and related projects would be reviewed by LADOT to ensure that such modifications do not create dangerous travel conditions. Although Violet Street adjacent to the Project Site is an existing cul-de-sac, no changes are proposed to the existing right-of-way. As summarized in Section III, Environmental Setting, of this Draft EIR, the related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements. As with the Project, such uses would be consistent with the surrounding uses in the vicinity of the Project Site and would not introduce any hazards onto or adjacent to the study area. Additionally, as with the Project, the design of related projects would also be reviewed by the Los Angeles Department of Building and Safety and LADOT during the City's plan review process to ensure all applicable building design requirements are met. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to hazardous geometric design features would be less than significant.**

(d) Emergency Access

As analyzed above, the Project would not result in inadequate emergency access, and Project impacts to emergency access would be less than significant. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed

throughout the study area and would not be concentrated to a specific location. Also, as previously discussed, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. **Therefore, the Project's contribution to impacts under cumulative conditions would not be considerable, and cumulative impacts with respect to emergency access would be less than significant.**

(2) Mitigation Measures

Cumulative impacts would be less than significant and no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts would be less than significant without mitigation.