IV. Environmental Impact Analysis

L. Transportation

1. Introduction

This section assesses potential Project impacts based on the Transportation Assessment for the 670 Mesquit Project (TA) prepared by Fehr & Peers, dated April 2021 and included as Appendix M-1 of this Draft EIR. The TA was prepared in accordance with the Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG) updated in July 2020 and pursuant to a memorandum of understanding (MOU) with LADOT dated June 9, 2020, documenting its assumptions and technical methodologies. The LADOT MOU is included in Appendix A of the TA. LADOT reviewed the TA and provided an approval letter of the TA on August 19, 2021, which is included as Appendix M-2 of this Draft EIR.

In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the CEQA-required analysis to be included within this Draft EIR section includes an assessment of whether the Project would result in: (1) potential conflicts with transportation-related plans, ordinances, or policies; (2) a substantial increase in vehicle miles traveled (VMT); or (3) increased hazards due to a geometric design feature or incompatible use. In addition, in accordance with CEQA Guidelines Appendix G and the City's CEQA Transportation Thresholds, an assessment of whether the Project would result in inadequate emergency access is included. Finally, in accordance with LADOT's interim guidance on freeway safety analysis issued in May 2020, a freeway safety analysis was conducted to evaluate whether the addition of Project traffic could cause or lengthen an off-ramp queue onto the freeway mainline that could constitute a potential safety impact under CEQA.[1]

The TAG also requires assessment of "non-CEQA" transportation issues, which include: (1) pedestrian, bicycle, and transit access;[2] (2) project access, safety, and circulation; (3) construction traffic; and (4) residential street cut-through analysis. Based on the screening criteria set forth in the TAG, a residential street cut-through analysis was not required for the Project. The analyses of the remaining three "non-CEQA" issues are included in the TA. However, since they are non-CEQA items, they are not analyzed in

[1] City of Los Angeles Department of Transportation, *LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis*, May 2020.

[2] In addition to the non-CEQA pedestrian, bicycle, and transit access topics identified in the TAG, this EIR considers any environmental impacts that the Project could have related to potential conflicts with a program, plan, ordinance or policy addressing transit, roadway, bicycle, and pedestrian facilities (pursuant to Threshold (a), as shown in Subsection 3.a, *Thresholds of Significance*).

this EIR, unless they relate to the assessment of potential conflicts with transportation-related plans, ordinances, or policies mentioned above. In addition, an analysis of intersection levels of service is included as appendices to the TA for informational purposes only and is similarly a non-CEQA issue.

2. Environmental Setting

a) Regulatory Framework

(1) Federal

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

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

(2) State

(a) Complete Streets Act

The Complete Streets Act (Assembly Bill [AB] 1358; Government Code Sections 65040.2 and 65302) was signed into law in 2008. The law requires that when updating the part of a local general plan that addresses roadways and traffic flows, cities and counties ensure 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 (AB) 32 and Senate Bill (SB) 375

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

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

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

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

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

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50% 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 (CVC)

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

(d) Senate Bill No. 743 / CEQA Guidelines Section 15064.3

California Senate Bill (SB) 743, which became effective on January 1, 2014, requires the focus of transportation analyses to shift from driver delay to the reduction of greenhouse gas (GHG) emissions, the creation of multimodal networks, and the promotion of a mix of land uses. SB 743 directed the Governor's Office of Planning and Research (OPR) to

prepare and develop revised guidelines for determining the significance of transportation impacts resulting from projects located within transit priority areas (TPAs).

CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, indicates that "…vehicle miles traveled is the most appropriate measure of transportation impacts." The revised guidelines require that lead agencies remove automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as a criterion for determining 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, 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."

In addition, CEQA Guidelines Section 15064.3(c) states that the provisions of Section 15064.3 shall apply statewide beginning on July 1, 2020, but that a lead agency may elect to be governed by its provisions immediately upon adoption. As noted below, on July 30, 2019, the City adopted VMT as part of its CEQA Transportation Thresholds as a criterion to determine transportation impacts, pursuant to SB 743 and the recent changes to CEQA Guidelines Section 15064.3.[3]

SB 743 also added 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 TPA shall not be considered significant impacts on the environment."[4] 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.[5] A TPA 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 450.332 of Title 23 of the Code of Federal Regulations."[6] PRC 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 AM and PM peak commute periods."[7] The Project is located within a 0.5 mile from a bus stop on the corner of 7th Street & Santa Fe Avenue for eastbound/southbound buses for Los Angeles County Metropolitan Transportation Authority (Metro) Lines 18, 60, and 62 and a bus stop on the corner of 7th Street & Imperial Street for westbound/northbound

3 City of Los Angeles, *City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric under the California Environmental Quality Act*, August 9, 2019.

4 California Public Resources Code (PRC), Section 21099(d)(1).

5 PRC, Section 21099(a)(4).

6 PRC, Section 21099(a)(7).

7 PRC, Section 21064.3.

Metro Lines 18, 60, and 62. Metro Lines 18 and 60 have average headways of less than 15 minutes in each direction during the morning and afternoon peak periods.[8] Therefore, the Project is located in a TPA as defined in PRC Section 21099 and Zoning Information (ZI) File No. 2452.[9]

(e) 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. CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, 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 the CMP. As such, the provisions of the 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) 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 Connect SoCal 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 greenhouse gas reduction targets set by the California Air Resources Board (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

[8] Fehr & Peers, *Applicability of Transit Priority Area (TPA) to the 670 Mesquit Project*, September 2, 2020. Provided in Appendix B of this Draft EIR.

[9] City of Los Angeles, Zoning Information No. 2452, *Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA*.

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), 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 half mile 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 half mile 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. Connect SoCal 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) Mobility Plan 2035

Mobility Plan 2035, which was adopted by the City of Los Angeles City Council on January 20, 2016, is a comprehensive update of the City's Transportation Element and incorporates "complete streets" principles.[10] Government Code Sections 65302(b)(2)(A) and (B) require a circulation element (i.e., Mobility Plan 2035) to provide for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways. "All users" by definition in the statute is

[10] City of Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, adopted by City Council, January 20, 2016.

"bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors."[11] This requirement was established as part of Assembly Bill 1358, which is referred to as the California Complete Streets Act, as well as the Caltrans Deputy Directive DD-64-R1, Complete Streets: Integrating the Transportation System.

Mobility Plan 2035 includes goals that define the City's five main priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication and Informed Choices; and (5) Clean Environmental & 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:[12]

- 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 categories:
    - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 40 miles per hour (mph).
    - Boulevard II provides 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-

[11] California Legislative Information, Assembly Bill No. 1358.

[12] City of Los Angeles Department of City Planning, *Complete Streets Design Guide*, adopted by City Council, August 12, 2015.

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.
  - Non-Continuous local streets that lead to a dead-end.

In addition, Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian, transit and vehicle infrastructure improvements. Each of the networks are defined as the following:

- The Neighborhood Enhanced Network (NEN) identifies 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 Transit Enhanced Network (TEN) identifies a network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The Bicycle Enhanced Network (BEN) identifies a network of streets that will receive treatments that prioritize bicyclists. The bicycle network is described in Policy 2.6 of Mobility Plan 2035 and includes gap closures for the protected bicycle lane system, bicycle paths, and Tier 1 protected Bicycle Lanes, which are bicycle facilities on arterial roadways with physical separation.
- The Bicycle Lane Network (BLN) identifies a network of streets that will receive treatments that prioritize bicyclists, specifically Tier 2 and Tier 3 Bicycle Lanes. 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 Vehicle Enhanced Network (VEN) identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The Pedestrian Enhanced Districts (PEDs) identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

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

(b) Central City North Community Plan

The Project Site is located in the Central City North Community Plan (Community Plan) Area, which includes the following transportation and circulation objectives and policies that are applicable to the Project:[13]

> **Policy 2-2.2:** New development needs to add to and enhance the existing pedestrian street activity.
>
> **Policy 2-2.3 and 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.
>
> **Policy 2-3.1:** New development needs to add to and enhance the existing pedestrian activity.

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. The TIMP provides an implementation program for the circulation needs of the Plan area. The following TIMP programs were reviewed to determine Project consistency with the Community Plan:

> **Street Reclassifications:** The TIMP proposes the implementation of a new street classification, local industrial, in the Central City North area.
>
> **Transportation Demand Management (TDM) Program:** The TIMP identifies TDM programs and other improvements to enhance safety and mobility in the Central City North area, such as encouraging the formation of Transportation Management Associations (TMAs) and the continued implementation of the Citywide TDM Ordinance. The following policies are relevant to the Project:
>
> > **Policy 12-1.1:** Encourages non-residential development to provide employee incentives for utilizing alternatives to the automobile.
> >
> > **Policy 12-1.3:** Requires that proposals for major new non-residential development projects include submission of a TDM Plan to the City.
> >
> > **Policy 12-1.4:** States that TDM measures in Central City North should be consistent with adopted City policy.

The Community Plan also provides for various modes of non-motorized transportation/circulation such as walking and bicycle riding by establishing policies and

[13] City of Los Angeles Department of City Planning, *Central City North Community Plan*, adopted December 15, 2000 and amended September 7, 2016, pages III-21 to III-26, http://planning.lacity.org/complan/pdf/ccncptxt.pdf. Accessed November 21, 2018

standards to facilitate the development of a bicycle route system which is intended to compliment other transportation modes. The following policy is relevant to the Project:

> **Policy 13.1.4:** Encourages the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.

Relevant policies in Chapter V, Urban Design, were also reviewed to assess the Project's consistency with the Community Plan. Design policies for individual projects that are relevant to the Project are:

> **C. Multiple Residential – 1. Site Planning:** All multi-family residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents.
>
> **C. Multiple Residential – 3. Parking Structures:** Parking structures shall be integrated with the design of the buildings they serve.

(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 AM to 9:00 PM on weekdays and from 8:00 AM to 6:00 PM 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

LADOT established the TAG in July 2019 (and consequent update in July 2020) 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 was 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 TA studies.

Project applicants and consultants must follow the procedures and standards set forth in the TAG when preparing and submitting a TA to ensure a timely review by LADOT. However, the TAG requirements may differ in certain areas of the City where specific plans or similar area specific ordinances establish distinct guidelines.

The TAG includes guidelines, methods, and impact criteria for CEQA considerations that focus on VMT, geometric hazards, and policy conflicts. The TAG also establishes a framework for various non-CEQA analyses including a pedestrian, bicycle, and transit access assessment, a project access, safety, and circulation assessment, project construction, and residential street cut-through analysis. As part of the CEQA considerations, each area of analysis is described in the TAG with a discussion of screening criteria, the methodology for analysis, impact criteria, and potential mitigation options.

(e) Freeway Safety Analysis

LADOT issued Interim Guidance for Freeway Safety Analysis (City Freeway Guidance) on May 1, 2020 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.

(f) LADOT Manual of Policies and Procedures Section 321

The 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.

(g) 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.

(h) 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.[14] The Plan for a Healthy Los Angeles addresses greenhouse gas emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

(i) Citywide Design Guidelines

The Citywide Design Guidelines (Design Guidelines) identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community.[15] The Design Guidelines are organized around three design approaches: pedestrian-first design, 360-degree design, and climate-adapted design.

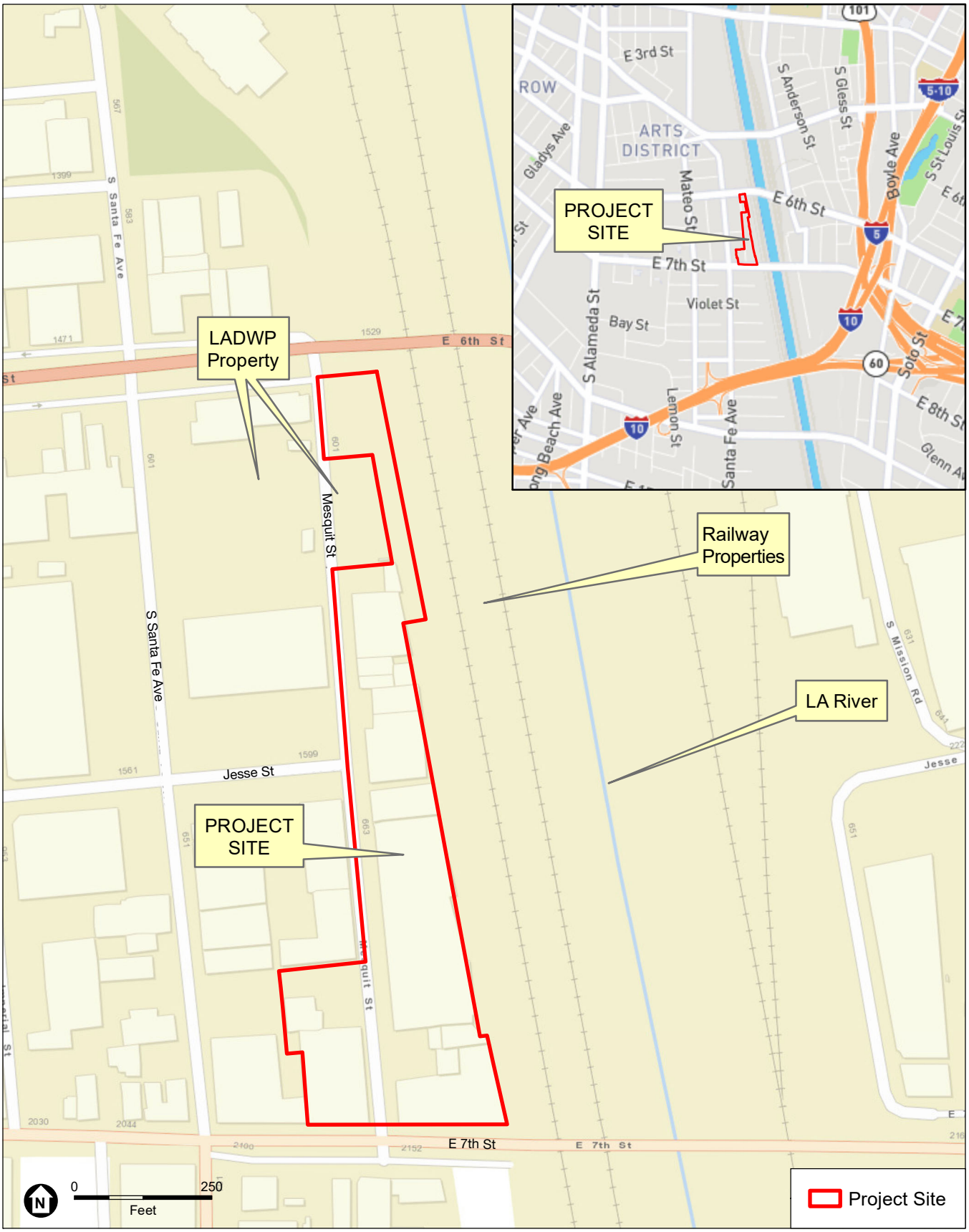
b) Existing Conditions

(1) Street System

The Project Site is located within the Central City North Community Plan area. The Project Site flanks Mesquit Street on the east and west between the former 6th Street Viaduct right-of-way on the north and the 7th Street Bridge on the south. The majority of the Project Site is on the east side of Mesquit Street, with additional parcels in the southern portion of the Project Site located on the west side of Mesquit Street at 7th Street. **Figure IV.L-1**, *Regional and Site Location Map*, illustrates the local roadway network in the Study Area. As described below, the Study Area is well-served by a network of freeways and streets. The streets in the Study Area are under the jurisdiction of the City. Freeways are under the jurisdiction of Caltrans.

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

[15] City of Los Angeles Department of City Planning Urban Design Studio, *Citywide Design Guidelines*, October 2019.



SOURCE: Open Street Map, 2016

670 Mesquit

Figure IV.L-1
Regional and Site Location Map

(a) Freeways

Primary regional access to the Project Site is provided by US-101, I-5, I-10, and SR 60, which are described below.

Interstate 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 Project Site, I-10 lies to the south of the Project Site and provides up to five lanes in each direction. Ramps near the Project Site are provided at Alameda Street, Mateo Street/Santa Fe Avenue, 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 LAC+USC Medical Center.

US-101 runs in a southeast-northwest direction and extends from Downtown Los Angeles to Ventura County and beyond. In the vicinity of the study area, US-101 lies north and east of the Project Site and provides three to four lanes in each direction. Freeway ramps closest to the Project Site are located at Alameda Street, 7th Street, 4th Street, and 1st Street.

Interstate 5 runs in a north-south direction and extends from San Diego, through the East Los Angeles Interchange, and north to the rest of California. In the vicinity of the study area, the freeway lies east of the Project Site and provides up to five lanes in each direction. Freeway ramps closest to the Project Site are located at 4th Street, 7th Street, and Soto Street.

State Route 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.

(b) Roadways

The characteristics of the major roadways in the Study Area are described below.

(i) East/West Roadways

4th Street is designated as Avenue II west of Alameda Street and Avenue III east of Alameda Street. 4th Street has three to four travel lanes all in the eastbound direction running north of the Project Site up to Hewitt Street. Parking is permitted along most portions of the roadway on both sides of the street, with peak hour restrictions west of San Pedro Street. A center running reversible lane exists along 4th Street east of Hewitt Street to the I-5 interchange. The reversible lane runs westbound during the AM peak period and eastbound during the PM peak period. The lane functions as a two-way left-turn lane outside the peak periods.

6th Street is designated as Avenue II near the Project Site. 6th Street is part of the TEN and BEN. West of Central Avenue, 6th Street has four travel lanes in the eastbound direction. From Mateo Street to the US-101 freeway, 6th Street is undergoing construction

as part of the Sixth Street Viaduct Replacement Project. When construction is completed in 2022, 6th Street east of Mateo Street will provide two travel lanes in each direction with left-turn pockets at major intersections. East of Central Avenue, 6th Street has two travel lanes in each direction with left-turn pockets at major intersections. Parking is generally permitted on both sides of the street east of Mateo Street, with peak hour restrictions west of Maple Avenue.

7th Street is designated as an Avenue II and is part of the TEN and BEN. East of Main Street, 7th Street has two travel lanes in each direction, which is reduced to one travel lane in each direction west of Main Street. Left-turn pockets are present at major intersections. Parking is permitted on both sides of the street. There are bike lanes in each direction west of Main Street.

Jesse Street is designated as a Collector with one through lane in each direction. Jesse Street runs west of the Project Site in an east-west direction, starting at Mateo Street and ending as a T-intersection at Mesquit Street. Parallel parking is permitted on both sides of the street between Mateo Street and Santa Fe Avenue, and loading is permitted on both sides of the street between Santa Fe Avenue and Mesquit Street.

(ii) North/South Roadways

Alameda Street is designated as an Avenue I in the study area and is part of the VEN. Alameda Street has two travel lanes running in each direction and turn pockets at most intersections. Parking is permitted between 7th Street and Olympic Boulevard on the west side of the street and between 7th Street and Bay Street on the east side of the street. Alameda Street also is part of the BEN and the Goods Movement network as the Alameda Corridor runs parallel to the roadway below grade.

Mateo Street is designated as an Avenue III with one travel lane in each direction and parking on both sides of the street. Mateo Street is part of the BEN, PED, and the NEN.

Santa Fe Avenue is designated as a Modified Avenue III north of the 4th Street Bridge and an Avenue II south of the 4th Street Bridge. Santa Fe Avenue has one travel lane running in each direction north of 7th Street, and two travel lanes in each direction south of 7th Street. Santa Fe Avenue is part of the NEN and PED.

Mesquit Street is designated as a Collector Street with one through lane in each direction. The northern end of Mesquit Street ends at 6th Street and the southern end of Mesquit Street ends at 7th Street. Parking is permitted on both sides on the street, with both parallel and front-in parking. As stated in Section 7, *Anticipated Project Approvals*, of Chapter II, *Project Description*, and as described in further detail below under Subsection 3.d.1.e.iii, *Waivers of Dedications and Improvements of the LAMC*, a request has been made to modify the designation of Mesquit Street to a Local Street - Limited as part of amendment to the Circulation Element of the General Plan (the Mobility Plan 2035) and the Community Plan Land Use Map.

(2) Public Transit

Due to its proximity to the transit hubs in Downtown Los Angeles, the Project Site is served by several transit lines. The Project Site is located one-quarter mile from the Metro Rapid 720 bus stop at Decatur Street and 7th Street and one-half mile from the Metro Rapid 760 bus stop at Alameda Street and 7th Street. Three Metro Local bus routes run within one-quarter mile of the Project Site: Metro Local Route 60 runs on 7th Street and Santa Fe Avenue, and Metro Local Routes 18 and 62 run on 7th Street and Whittier Boulevard. The nearest LADOT Downtown Area Short Hop (DASH) Loop A stop is located approximately 0.28 miles northwest of the Project Site at the corner of Molino Street and Palmetto Street. In addition, the Project Site is 0.7 miles from the Metro L (Gold) Line Pico/Aliso Station and approximately 1.5 miles from the Union Station transportation hub.

Figure IV.L-2, *Existing Transit*, shows the various transit routes providing service within walking distance (up to 1 mile) of the Project Site. **Table IV.L-1**, *Existing Transit Service*, details the existing transit service within one mile of the Project Site.

(3) Bicycle and Pedestrian Facilities

Figure IV.L-3, *Existing Bicycle Facilities*, shows existing citywide designated bicycle facilities near the Project Site. There are currently bike lanes on 4th Place from Alameda Street to Hewitt Street, on 3rd Street from 4th Place to Santa Fe Avenue, and on Mateo Street from 6th Street to East 4th Street in the study area.

The Project 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 lack curbs, sidewalks, and accessible ramps due to the industrial nature of the area. Mesquit Street, which runs along the Project Site's frontage, has sidewalks on the eastern and western side of the street from Jesse Street to 6th Street. South of Jesse Street, Mesquit Street has sidewalks on the western side of the street approximately halfway to the dead-end to 7th Street and no sidewalks on either side of the street for the remaining length of the street to 7th Street. A detailed inventory of pedestrian facilities is provided in the TA, which is included as Appendix M-1 of this Draft EIR.

(4) Vision Zero

The following roadways located within the Project Study Area have been identified by the City as part of the HIN:

- Alameda Street (north of 6th Street)
- 4th Street (east of Gless Street)
- 6th Street (west of Mateo Street)
- 7th Street (west of Mateo Street)

TABLE IV.L-1
EXISTING TRANSIT SERVICE

Line #	Operator	Service Type	Service From	Via	Weekday Headways	
					AM	PM
60	Metro	Local	Downtown Long Beach to Downtown Los Angeles	7th St	7–12 min.	6–10 min.
760	Metro	Rapid	Lynwood to Downtown Los Angeles	7th St	10–15 min.	12–15 min.
62	Metro	Local	Hawaiian Gardens to Downtown Los Angeles	Central Ave	15–20 min.	20–25 min.
20	Metro	Local	Santa Monica to Downtown Los Angeles	7th St	11–12 min.	10 min.
720	Metro	Rapid	Santa Monica to Commerce	6th St	4–9 min.	3–10 min.
53	Metro	Local	Carson to Downtown Los Angeles	Central Ave	5–16 min.	7–15 min.
16	Metro	Local	Century City to Downtown Los Angeles	5th & 6th St	7 min.	9 min.
18	Metro	Local	Koreatown to Montebello	Central Ave	4–10 min.	6–12 min.
106	Metro	Local	Boyle Heights to Monterey Park	Boyle Ave	50 min.	50 min.
51	Metro	Local	Compton to Koreatown	San Pedro St	15 min.	12–15 min.
251	Metro	Local	Cypress Park to Lynwood	Soto St	20 min.	20–40 min.
751	Metro	Rapid	Cypress Park to South Gate	Soto St	10 min.	16–18 min.
66	Metro	Local	Montebello to Koreatown	San Pedro St	2–15 min.	6–10 min.
DASH Downtown A	LADOT	Shuttle	Financial District to Arts District	3rd St	7 min.	7 min.

SOURCE: Fehr & Peers, TA, Table 1.

SOURCE: Fehr & Peers, 2020

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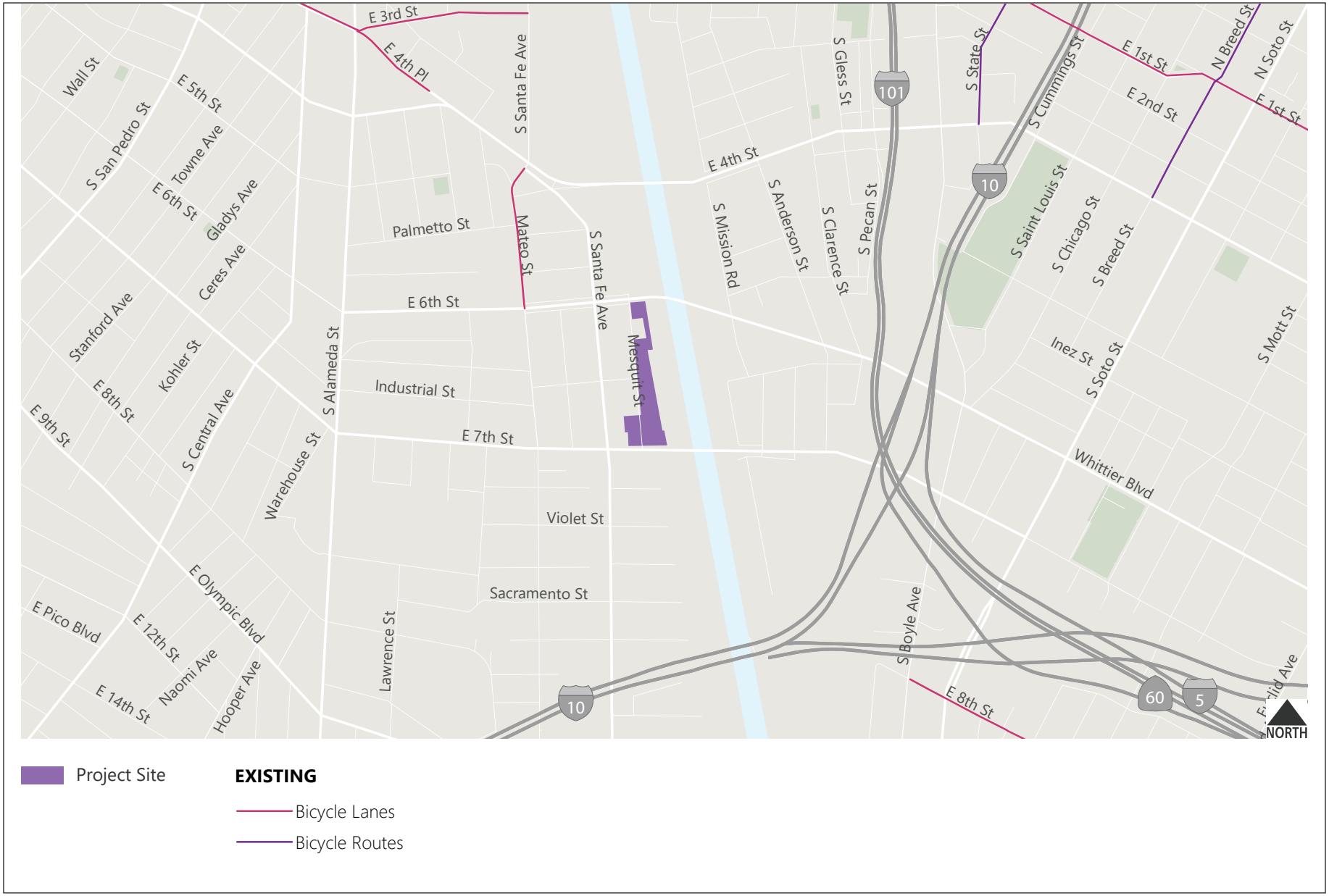
Figure IV.L-2
Existing Transit



SOURCE: Fehr & Peers, 2020

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Figure IV.L-3
Existing Bicycle Facilities

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines and the TAG, a project would have a significant impact related to transportation if it would:

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

Threshold (b): Conflict or be inconsistent with CEQA Guidelines 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?

b) Methodology

(1) Requirements for Transportation Assessments

In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the 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 a new TAG. The analysis in this section and the TA, included as Appendix M-1 of this Draft EIR, uses the TAG that was updated in July 2020.

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

As previously stated, the TAG requires Project review for conflicts with transportation-related plans, programs, ordinances, or policies. For projects meeting the screening criteria set forth in Section 2.1-2 of the TAG, the analysis addresses whether the Project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If the Project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself over time, and over a broad area. Rather, the Project would result in a conflict if it would preclude

the City from implementing adopted transportation-related programs, plans and policies. Furthermore, if a conflict is identified in association with the Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given program, plan and policy would foreseeably result in a physical impact on the environment.[16]

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project area. The analysis considers whether there would be a significant impact to the environment to which both the Project and other projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located on the same block, were to preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework.

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

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

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located (see **Table IV.L-2**, *VMT Impact Criteria (15% Below APC Average)*).
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located (see Table 2.2-1 of the TAG).
- 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. In the latter case, a net increase in VMT is considered to be significant. Local-serving is defined as retail uses less than 50,000 square feet. The proposed retail components of the Project total more than 50,000 square feet and therefore could be considered regional-serving.
- For mixed-use projects, reductions in daily trips and VMT due to internal capture between the project's land uses should be considered, after which the impact criteria above are applied for each individual land use.

The Project Site is located within the Central APC area, which has a daily household VMT per capita impact criteria of 6.0 and a daily work VMT per employee impact criteria of 7.6.

[16] The rule of general plan consistency is that a project must at least be compatible with the objectives and policies of the general plan. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182] (Sequoyah Hills).

TABLE IV.L-2
VMT IMPACT CRITERIA (15% BELOW APC AVERAGE)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

SOURCE: LADOT, Transportation Assessment Guidelines, Table 2.2-1, 2020.

(b) VMT Analysis

Per the TAG, household VMT per capita and work VMT per employee were estimated using the VMT Calculator tool for the Project. The VMT Calculator starts with Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition trip generation rates, but then implements the MXD (mixed-use) methodology from the USEPA and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model, which is calibrated to Los Angeles conditions, to adjust the trips for internalization, transit, and walkability.[17] The VMT Calculator was calibrated based on local count data collected in the City. Further information regarding the methods used by the VMT Calculator to estimate daily trips and daily VMT is provided in the City's VMT Calculator Documentation report.[18]

The VMT Calculator allows for the selection of a wide variety of potential land uses, including the multi-family housing, hotel, office, retail, and restaurant uses proposed as part of the Project. Certain components of the proposed Project land uses, however, are not explicitly included in the VMT Calculator. For the purposes of the VMT analysis, the farmer's market was included with the grocery use, the food hall was included with the restaurant use, and the studio/event/gallery, group exercise classes, and busking were included with the gym use.

[17] The LA VMT Calculator was under development prior to release of the 10th Edition of ITE's trip generation manual in late 2017. The VMT Calculator was validated to LA conditions based on the empirical counts conducted at market rate residential, affordable housing, office, and mixed-use sites in the City, regardless of the source of the rates used as a starting point.

[18] City of Los Angeles, Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation*, November 2019.

In addition to the VMT Calculator, the City of Los Angeles' citywide travel demand forecasting model was run to evaluate the potential for the proposed retail uses to result in a net increase in VMT. Since the overall number of trips in the citywide model is based on trips originating in residences (home-based trips), the total number of trips across the entire model network will not be influenced materially by the introduction of the additional retail space. Rather the model will redistribute home-shopping trips from other retail destinations to the proposed retail destination.[19] The retail trips redistributed to the Project are considered to be Project-related trips because they are drawn to the Project but are not new from a regional standpoint. Although the Project and the Project with the Deck Concept include the same building programing and outdoor programming activities, under the Project with the Deck Concept, the timing and frequency of outdoor programing would increase, along with vehicular trips and effects on retail VMT. Although the effect of this difference does not meaningfully change the VMT analysis and impact findings, the VMT analysis of retail uses for the Project and the Project with the Deck Concept are both based on the added outdoor programing under the Project with the Deck Concept, which presents a worst-case analysis.

The Project VMT impact is considered significant if any one (or all) of the Project land uses exceed the impact criteria above 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 would be considered.

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: parking, transit, education and encouragement, commute trip reductions, shared mobility, bicycle infrastructure, and neighborhood enhancement.

TDM reductions within each of these categories and for the Project were applied according to the guidance found in the City of Los Angeles VMT Calculator Documentation and the TDM Strategies Appendix, which have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in the California Air Pollution Control Officers Association (CAPCOA) research and methodologies as described in Quantifying Greenhouse Gas Mitigation Measures.[20,21,22] Residential and commercial land use TDM credits are calculated separately, as certain TDM measures are more appropriately employed for commercial or residential land uses. For example, for commercial tenants, vanpools and rideshare

[19] Los Angeles Department of Transportation, *Transportation Assessment Guidelines*, Section 2.2.4, Page 2-9, July 2020.

[20] LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation Version 1.3*, May 2020.

[21] LADOT, Attachment G Transportation Demand Management Strategies in LA VMT Calculator, November 2019.

[22] California Air Pollution Control Officers Association (CAPCOA), *Quantifying Greenhouse Gas Mitigation Measures*, August 2010.

may be effective tools to reduce employee solo vehicle trips. However, vanpools would be difficult to implement for residents who are traveling from the Project to many disparate destinations. For residents, unbundling parking is more effective because residents are incentivized to reduce car ownership to save on condominium unit purchase price or monthly rental costs for a vehicular parking space. Additionally, the net effectiveness of commute trip reductions is reduced for the commercial land uses as those measures are only applicable to the work trips made by commercial land use employees, rather than the trips made by the commercial patrons.

The cumulative analysis considers both short- and long-term Project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis described above. Cumulative effects are determined through a consistency check with the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020–2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and 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. As the Project Site is in an HQTA, where the 2020–2045 RTP/SCS encourages development, this does not apply to the Project. However, 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 project impact 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 greenhouse gas reduction goals of SCAG's 2020–2045 RTP/SCS.[23]

Projects that both demonstrate a project impact by exceeding an efficiency-based VMT threshold and that are not deemed to be consistent with the 2020–2045 RTP/SCS could have a significant cumulative impact on VMT. Further evaluation would be necessary to determine whether such a project's cumulative impact on VMT is significant. This analysis could be conducted by running the City's Travel Demand Forecasting model with the cumulative "no project" scenario representing the adopted 2020–2045 RTP/SCS cumulative year conditions (as incorporated into the City's model) and the cumulative "plus project" scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the Project. Citywide VMT, household VMT per capita, or work VMT per employee (depending on project type) would be calculated for both scenarios, and any increase in VMT, household VMT per capita, or work VMT per employee (depending on project type) above that which was forecast in

[23] LADOT, *City of Los Angeles Transportation Assessment Guidelines*, July 2020, page 2-10.

the adopted 2020–2045 RTP/SCS would constitute a significant cumulative impact because it could jeopardize regional air quality conformity or GHG reduction findings.[24]

(4) Geometric Design Feature or Incompatible Use Hazards

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

Project access plans are reviewed in light of commonly-accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant.[25] The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at Project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the Project Site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facilities the Project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the Project Site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The Project location or Project-related changes to the public right-of-way relative to proximity to the HIN or a Safe Routes to School program area.

Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

(5) Freeway Safety Analysis

Based on the City Freeway Guidance, a transportation assessment for a development project must include analysis of any freeway off-ramp where the project adds 25 or more

[24] LADOT, *City of Los Angeles Transportation Assessment Guidelines*, July 2020, page 2-10.

[25] One example of traffic engineering design standards includes, but is not limited to Section 321 of LADOT's Manual of Policies and Procedures, which provides guidance on driveway design.

peak hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria were met:

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

Should a significant impact be identified, mitigation measures to be considered include TDM measures to reduce a project's trip generation, investments in active transportation or transit system infrastructure to reduce a 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 improve safety, not induce greater VMT, and not result in secondary environmental impacts.

(6) Emergency Access

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

c) Project Design Features

The following Project Design Features are applicable to the Project.

TRAF-PDF-1: Construction Traffic Management Plan. Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan will be prepared and submitted to the City for review and approval. The Construction Management Plan will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Ensure that access will be maintained for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.

- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- Describe the haul truck routes and avoid haul truck routes that travel past Los Angeles Unified School District facilities.

TRAF-PDF-2: Construction Worker Parking Plan. The Project Applicant will prepare a Construction Worker Parking Plan prior to issuance of a demolition permit or building permit to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate:

- During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan shall identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Construction workers will not be permitted to park on the street with the exception of Mesquit Street and Jesse Street east of Santa Fe Avenue.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

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

The TAG Guidelines, Table 2.1-1, *City Documents that Establish Regulatory Framework*, includes a list of City plans, policies, programs, ordinances and standards that should be consulted to help identify potential conflicts with projects undergoing CEQA review. Also, Table 2.1-2, *Questions to Determine Project Applicability to Plans, Policies and Programs*, of the TAG includes screening questions for determining Project applicability to relevant plans, policies, and programs, in order to assess whether the Project would preclude their implementation. The questions and responses to each screening question in Table 2.1-2 of the TAG is included in Appendix C of the TA. Upon review of Table 2.1-1 and the responses to Table 2.1-2 provided in the TA, the following plans, policies, programs were determined relevant to the Project and are analyzed in this EIR section: Mobility Plan 2035, Community Plan, LADOT MPP, Vision Zero, Plan for a Healthy Los Angeles, LAMC (various sections), and the Citywide Design Guidelines. Based on the

review, it was determined that there are no applicable Specific Plans since the Project Site is not located within an area governed by a Specific Plan. In addition, there are no streetscape plans near the Project Site, and the general recommendations in LADOT's Transportation Technology Strategy – Urban Mobility in a Digital Age are not directly relevant to the Project.

The analysis below includes a consistency analysis with the plans, policies and programs determined to be applicable to the Project.

(a) Mobility Plan 2035

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. **Table IV.L-3**, *Consistency of the Project with Applicable Policies and Programs of Mobility Plan 2035*, provides determinations of whether the Project would conflict with any of the applicable policies and programs in Mobility Plan 2035. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
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.	**No Conflict.** As shown in Figure II-4 of Chapter II, *Project Description*, of this Draft EIR, the Project proposes to vacate the eastern half of Mesquit Street from the northern end of Building 1 to Jesse Street and all of Mesquit Street from Jesse Street to 7th Street. The Project proposes to convert Mesquit Street from Jesse Street to 7th Street to the Mesquit Paseo, a pedestrian paseo with limited vehicular access (e.g., for emergency vehicles) that connects Mesquit Street and 7th Street through stairs, elevators, and escalators between Buildings 4 and 5. The Mesquit Paseo would serve multiple purposes by improving bicyclist and pedestrian connectivity with the connection between Mesquit Street and 7th Street and by activating the area with a weekend farmers market that would occur monthly. The Project does not propose physical changes to the Mesquit Street roadway from Jesse Street to the northern end of Building 1 and will maintain public access. The Project proposes to add street trees and new sidewalks along the Project frontage on Mesquit Street from the northern end of Building 1 to Jesse Street.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
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.	**No Conflict.** The Project proposes several right-of-way improvements to enhance pedestrian access to, from, and around the Project Site: • New pedestrian crosswalk on the 7th Street Bridge to access the eastern portion of the Project Site (near Building 4); as shown in Appendix M-2, LADOT reviewed the conceptual site plan, which includes the new pedestrian crosswalk, and determined the conceptual site plan is acceptable. • New Elevated Pedestrian Walkway from the 7th Street Bridge to access the eastern portion of the Project Site • New sidewalks along the Project frontage on Mesquit Street • Improvements to pedestrian lighting around the Project Site
2.7 – Vehicle Network. Provide vehicular access to the regional freeway system.	**No Conflict.** All existing roadways adjacent to the Project Site would continue to provide access to the regional freeway system, particularly US-101 located approximately 0.4 miles east of the Project Site, similar to existing conditions.
2.10 – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.	**No Conflict.** The Project proposes a curbside passenger loading zone along Mesquit Street, from Jesse Street to 6th Street. Passenger loading activity would likely have a minimal impact on the surrounding street network given that the passenger loading zone is designed as a pull-out along the curb with sufficient space for passenger pick-up and drop-off. Primary service access would be provided via loading docks located within the ground level of the Project's parking structure. Large truck deliveries would enter and exit the parking structure via the northern driveway on Mesquit Street and have turnaround capability provided within the Project site. A loading area accommodating cars or vans associated with residential and commercial uses would also be accessible via the northern driveway on Mesquit Street.
3.2 – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	**No Conflict.** Modifications to the public right-of-way are required to provide ADA accommodations for accessibility. The Project proposes to add new ADA-compliance sidewalks along the perimeter of the Project Site. The Project would not inhibit sidewalk areas or create any obstructions to limit or inconvenience the mobility of travelers with disabilities along the public right-of-way.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
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.	**No Conflict.** The Project would enhance the usage of walking, biking, and transit modes as alternatives to vehicle travel by including bicycle amenities (e.g., bicycle parking, showers, and repair facilities) and site design considerations to encourage multi-modal transit. The Project would also implement Mitigation Measure TRAF-MM-1 (TDM Program) to discourage single-occupancy vehicle trips. The TDM Program would include strategies such as unbundled parking, subsidized/discounted transit passes, and public bus stop enhancements/amenities. These Project improvements and programs would improve first/last mile access and encourage use of nearby transit, including existing bus service and the proposed future Metro Arts District/6th Street Station, which is currently under study.
3.8 – Bicycle Parking. Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** The Project would provide on-site bicycle parking to support the proposed on-site uses in accordance with the proposed Mesquit Specific Plan. The Project would provide a minimum of 288 short-term and 519 long-term bicycle parking spaces, which would conform to the required number of bike parking spaces and siting/design requirements of Section 12.21 A.16 of the LAMC. Refer also to response to Policy 3.5, above. The Project would provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.
3.9 – Increased Network Access. Discourage the vacation of public rights-of-way.	**No Conflict.** Streets, alleys, stairways, and other public right-of-ways play an important role in the City's mobility system by facilitating better connectivity. Therefore, this policy discourages the vacation of public rights-of-way on the basis that these types of changes may limit connectivity by increasing block sizes and removing previously accessible travel routes for multimodal activity. This policy focuses on maintaining network access through strategies, such as smaller block sizes to facilitate connectivity for travelers in the area. The Project would not restrict public access to Mesquit Street, other than limiting vehicle access (e.g., for emergency vehicles) to the Mesquit Paseo from Jesse Street to 7th Street. Mesquit Street currently ends at 7th Street so the conversion to the Mesquit Paseo would have little to no impacts on network connectivity or vehicular travel. The conversion to the Mesquit Paseo would improve bicyclist and pedestrian connectivity by creating a new connection between Mesquit Street and 7th Street through stairs, elevators, and escalators between Buildings 4 and 5.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
3.10 – Cul-de-sacs. Discourage the use of cul-de-sacs that do not provide access for active transportation options.	**No Conflict.** The southern end of Mesquit Street is currently a cul-de-sac that is used for parking under the 7th Street Bridge. The Project proposes to convert Mesquit Street from Jesse Street to 7th Street to the Mesquit Paseo with limited vehicular access and a view corridor from Mesquit Street to 7th Street with through pedestrian and bicyclist access. The Mesquit Paseo would improve access for people walking and biking by creating convenient and direct public access between Mesquit Street and 7th Street through stairs, elevators, and escalators between Buildings 4 and 5, which is currently unavailable as Mesquit Street and 7th Street are currently not connected.
4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The Project has committed to implement numerous TDM measures both as part of the Project and as required by Mitigation Measure TRAF-MM-1. Refer also to response to policy 3.5. The TDM measures are aimed at discouraging single-occupancy vehicle trips and would collectively serve to reduce dependence on single-occupancy vehicles.
4.13 – Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** The Project proposes structured parking at, above, and below grade. Up to six levels of below-grade parking are proposed, spanning the buildings' footprints, with at-grade and above-grade parking within Building 5. Mitigation Measure TRAF-MM-1 would discourage single-occupancy vehicle trips and would make alternative modes of transportation more attractive. As such, the Project would balance parking supply with other transportation and land use objectives.
5.1 – Sustainable Transportation. Encourage the development of a sustainable transportation system that promotes environmental and public health.	**No Conflict.** The Project's mix of residential, hotel and commercial uses would allow residents, employees, and visitors/patrons to make transportation choices that are more environmentally sustainable and promote public health by providing convenient access to walking, biking and transit options in and around the Project Site. Pedestrian access to the Project Site would be provided by the Entry Plazas between Buildings 1 through 5, which would also provide access from Mesquit Street to the Elevated Pedestrian Walkway. The Project would also provide bicycle parking spaces and amenities. Overall, the Project's features would encourage a sustainable transportation system that promotes environmental and public health.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
5.2 – Vehicle Miles Traveled. Support ways to reduce VMT per capita.	**No Conflict.** The Project would implement Mitigation Measure TRAF-MM-1, which would support strategies to encourage public transit, such as providing unbundled parking, on-site locations to purchase Metro passes, transit subsidies, a commute trip reduction program; shared mobility features (i.e., bike and car share); bicycle friendly infrastructure, education and encouragement programs on available transit options; and on-site management of TDM programs. These TDM measures would collectively serve to reduce VMT per capita.
5.4 – Clean Fuels and Vehicles. Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	**No Conflict.** The Project would encourage the use of electric vehicles by providing parking spaces capable of supporting electric vehicle supply equipment for a minimum of 30 percent of the provided parking spaces, with 10 percent of the provided spaces further improved with electric vehicle charging stations. As such, the Project would support the use of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.
Program PL.1 - Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.	**No Conflict.** The intent of the program is to minimize interference with pedestrian access and vehicular movement. The Project proposes four driveways with two driveways along 7th Street and two driveways along Mesquit Street. The two driveways along Mesquit Street conform with the program because Mesquit Street is classified as a Collector Street and is proposed to be re-designated as a Local Street - Limited. 7th Street is classified as Avenue II, and vehicles would be restricted from turning left into the eastern driveway on 7th Street and limited to egress-only with right-turns out of the western driveway on 7th Street. The eastern driveway on 7th Street would also be signalized to facilitate safe pedestrian access across the 7th Street Bridge. As shown in Appendix M-2, LADOT reviewed the conceptual site plan, which depicts the signalized driveway, and determined the conceptual site plan is acceptable. While the Project proposes driveways on an arterial street, the Project would be consistent with the intent of the program to minimize interference with pedestrian access or vehicular movement, thereby facilitating safe and efficient pedestrian access and vehicular movement by distributing site access and taking measures to minimize vehicle-pedestrian conflicts rather than concentrating vehicular access on Mesquit Street.

TABLE IV.L-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF MOBILITY PLAN 2035

Policy/Issue/Program	Would the Project Conflict?
Program PS.3 – Pedestrian Loops. Explore the development of a connected network of walking passageways utilizing both public and private spaces, local streets and alleyways to facilitate circulation.	**No Conflict.** The Project would be consistent with this program and aid in providing a walkable pedestrian environment around the Project Site. Multiple pedestrian passageways via the Entry Plazas would be provided throughout the Project Site. This connection would enhance pedestrian connectivity to other public spaces, such as sidewalks, for pedestrian connectivity. The North River Balcony would also connect to the Project's Northern Landscaped Area, the proposed open space improvements associated with the Sixth Street Viaduct Replacement project (i.e., the Park, Arts, River, and Connectivity (PARC) Improvements); and the proposed future Metro Arts District/6th Street Station. The Elevated Pedestrian Walkway and Northern Landscaped Area, both of which would be publicly accessible, would provide pedestrian connections between 6th Street and 7th Street.
Program PK.7 – Off-Street Loading. In non-industrial areas, require off-street dock and/or loading facilities for all new non-residential buildings and for existing non-residential buildings and undergoing extensive renovations and/or expansion, whenever practical.	**No Conflict.** The Project includes loading areas that minimally impact other travelers, such as people driving or walking. The Project proposes a curbside passenger loading zone along Mesquit Street, from Jesse Street to 6th Street. Primary service access would be provided via loading docks located within the ground level of the Project's parking structure. Large truck deliveries would enter and exit the parking structure via the northern driveway on Mesquit Street and have turnaround capability provided within the Project site. A loading area accommodating cars or vans associated with residential and commercial uses would also be accessible via the northern driveway on Mesquit Street. Refer also to response to policy 2.10.

SOURCE: ESA, 2020.

Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

Table IV.L-4, *Consistency of the Project with Applicable Policies and Programs of the Community Plan*, provides determinations of whether the Project would conflict with any of the applicable policies and programs in the Community Plan. As shown therein, the Project would not conflict with any of the applicable policies and programs adopted to protect the environment and reduce VMT.

TABLE IV.L-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE COMMUNITY PLAN

Policy/Issue/Program	Would the Project Conflict?
Chapter III, Land Use Plan Policies and Programs	
2-2.2: New development needs to add to and enhance the existing pedestrian street activity.	**No Conflict.** The Project proposes several pedestrian access improvements. The Project would add new pedestrian crosswalks on the 7th Street Bridge for people walking to access the eastern portion of the Project Site near Building 4. As shown in Appendix M-2, LADOT reviewed the conceptual site plan, which includes the new pedestrian crosswalks, and determined the conceptual site plan is acceptable. The Project would also add the Elevated Pedestrian Walkway from the 7th Street Bridge for people wanting to access the eastern portion of the Project Site. Four pedestrian passageways (Entry Plazas) are proposed between Mesquit Street and the eastern edge of the Project Site that would visually connect Boyle Heights, the Los Angeles River, the Arts District, and greater Downtown. The Entry Plazas would be located between each of Buildings 1 through 5. The Project would also add new sidewalks and improve the pedestrian lighting around the Project Site.
2-2.3 and 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.	**No Conflict.** While the Project is not located in a designated pedestrian oriented district, the Project would develop a variety of commercial uses for the ground floor of the Project. The following are uses proposed for the ground floor of each building: Building 1 would have the residential lobby and hotel lobby; Building 2 would have the office lobby and retail; Building 3 would have the studio/event/gallery lobby, office lobby, and retail; and Building 4 would have retail and restaurants; and Building 5 would retail, office lobby, and would have access to the parking garage. Therefore, the Project's ground floor would incorporate a range of commercial uses and would not conflict with this policy.
2-3.1: New development needs to add to and enhance the existing pedestrian activity.	**No Conflict.** The Project proposes several pedestrian access improvements. The Project would add new pedestrian crosswalks on the 7th Street Bridge for people walking to access the eastern portion of the Project Site near Building 4. There would be one crosswalk across 7th on the east side of the driveway, and a second crosswalk on the bridge across the driveway itself. The Project would also add the Elevated Pedestrian Walkway from the 7th Street Bridge for people wanting to access the eastern portion of the Project Site. Four pedestrian passageways (Entry Plazas) are proposed between Mesquit Street and the eastern edge of the Project Site that would visually connect Boyle Heights, the Los Angeles River, the Arts District, and greater Downtown. The Entry Plazas would be located between each of Buildings 1 through 5. The Project would also add new sidewalks and improve the pedestrian lighting around the Project Site.

TABLE IV.L-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES AND PROGRAMS OF THE COMMUNITY PLAN

Policy/Issue/Program	Would the Project Conflict?
12-1.1: Encourages non-residential development to provide employee incentives for utilizing alternatives to the automobile.	**No Conflict.** The Project would incorporate Mitigation Measure TRAF-MM-1, which would implement a TDM plan. The final TDM plan will be approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project.
12-1.3: Requires that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** The Project would incorporate Mitigation Measure TRAF-MM-1, which would implement a TDM plan. The final TDM plan will be approved by LADOT prior to the City's issuance of the first certificate of occupancy for the Project.
12-1.4: TDM measures in Central City North should be consistent with adopted City policy.	**No Conflict.** 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. Potential TDM strategies include, but are not limited to, a commute trip reduction program for office and commercial workers and residents, parking cost unbundled from leases for office and commercial tenants, employee parking cash-out and pricing workplace parking. With the TDM program, the vehicles trips generated by the commercial office component of the projects are estimated to be reduced by 18 percent.
13-1.4: Encourages the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.	**No Conflict.** The Project will provide a minimum of 288 short-term and 519 long-term bicycle parking spaces, as required by the proposed Mesquit Specific Plan, which would also conform to the required number of bike parking spaces and siting/design requirements of Section 12.21 A.16 of the LAMC. The Project would also provide a self-service bike repair area.
Chapter V, Urban Design	
Design Policy C. Multiple Residential – 3. Parking Structures: Requires that parking structures be integrated with the design of the buildings they serve.	**No Conflict.** The Project proposes structured parking at, above, and below grade. Up to six levels of below-grade parking are proposed, spanning the buildings' footprints. Buildings 1 through 3 are located on top of five below-grade levels of parking. Building 4 is located over a parking ramp from 7th Street down to the first floor and is also located above five below-grade levels of parking. Building 5 would include one at-grade, one above-grade, and five below-grade levels of parking. The majority of the parking would be provided within the subterranean parking structure. The limited amount of above-grade parking proposed for the Project within Building 5 would not be visible from the 7th Street Bridge due to an intervening pedestrian ramp and architectural screening (i.e., walls and/or metal mesh). As viewed from Mesquit Street, parking within Building 5 would screened from view via architectural screening.

SOURCE: ESA, 2020.

(b) LADOT Manual of Policies and Procedures

The LADOT MPP provides plans and requirements for traffic infrastructure features in the City, including driveway design and placement guidelines, loading zones, roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes. The Project Site would be located in a primarily industrial area with limited commercial development. The Project would contribute to improving walkability to the Project Site and vicinity, including new sidewalks and improved lighting around the perimeter of the Project Site. Various pedestrian entryways via the Entry Plazas would allow visitors, residents, and employees to access the Project Site. People accessing the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. There would be minimal impediments from street trees to ensure adequate driver and pedestrian visibility. For safety, the Project proposes to install a signal for the driveway on 7th Street, which would also include a crosswalk to facilitate pedestrians crossing 7th Street. MPP 321 allows up to two driveways for up to 400 feet of frontage and an additional driveway for every additional 400 feet of frontage. The Project proposes two driveways along Project frontage greater than 400 feet on 7th Street. MPP 321 on the design of driveways also states that on a collector or local street, such as Mesquit Street, driveways should not be placed within 75 feet of the adjacent street. The proposed driveway on the southern end of Mesquit Street is located within 75 feet of the Mesquit Street & Jesse Street intersection as it is directly opposite of the existing end of Jesse Street and would create a fourth leg to the existing 3-legged intersection. MPP 321 further details that driveways at the top of a “T” intersection are to be centered within one foot of the prolongation of the terminating street center line. Therefore, the proposed driveway at Mesquit Street & Jesse Street complies with MPP 321. The driveway on the northern end of Mesquit Street is more than 75 feet away from 6th Street. The Project would also locate driveways at right angles to avoid visibility challenges once vehicles have exited the subterranean parking garage by Mesquit Street at Jesse Street. Based on the above, the Project would not conflict with the LADOT MPP adopted to protect the environment.

(c) Vision Zero

As discussed above, Vision Zero is a plan that strives to eliminate traffic-related deaths in Los Angeles by 2025 through strategies, such as modifying streets to better serve vulnerable road users. The Project Site is not located adjacent to any streets identified in the High Injury Network. No other streets within the Project vicinity are identified in the High Injury Network. The Project improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City. Based on the above, the Project would not conflict with Vision Zero policies adopted to protect the environment.

(d) Los Angeles Municipal Code

(i) Vehicle and Bicycle Parking

CEQA Appendix G significance thresholds listed above in Section 3.a, *Thresholds of Significance*, do not include any thresholds related to parking supply or demand. As such,

this EIR presents the Project's parking code requirements for informational purposes only, and no significance conclusions are made with respect to the information provided below.

Parking requirements for the Project were estimated using the City's zoning code requirements. Specific LAMC provisions that relate to vehicle and bicycle parking requirements for the Project and its proposed land uses are described in the TA, provided as Appendix M-1 of this Draft EIR. The vehicle parking requirement for the Project per LAMC is 2,737 vehicle spaces, which includes a reduction in required spaces through the provision of required bicycle parking. Furthermore, the Project would provide a minimum of 288 short-term and 519 long-term bicycle parking spaces, as required by the proposed Mesquit Specific Plan, which would conform to the requirements of Section 12.21 A.16 of the LAMC.

The Project would provide parking for 2,000 to 3,500 vehicles on-site through a combination of traditional parking stalls, valet, and semi-automated parking systems. Although the proposed vehicle parking may not meet the LAMC requirements, the requirements would be superseded by the requirements established through the proposed Specific Plan that would establish land use regulations for the Project Site. With approval of the proposed Specific Plan, which would include its parking provision standards, there would not be a conflict with the vehicle parking regulations.

(ii) TDM Ordinance

LAMC Section 12.26 J, the TDM Ordinance, establishes trip reduction requirements for non-residential projects in excess of 25,000 square feet. The Project would incorporate TDM measures as part of the Project design and as part of Mitigation Measure TRAF-MM-1 to encourage use of alternative transportation modes in line with the requirements set forth in the TDM Ordinance.

(iii) Waivers of Dedications and Improvements

LAMC Section 12.37 includes the highway and collector street dedication and improvement to the public right-of-way. Under LAMC Section 12.37 I, or pursuant to zone change or tract map approvals, development projects may request a waiver of dedication or improvement requirements. The Project is requesting a waiver to the required dedication along 7th Street due to fact that 7th Street is elevated along the Project frontage, which presents a physical constraint. Furthermore, rather than dedicate the right-of-way on Mesquit Street, the Project proposes to vacate Mesquit Street from 6th Street to 7th Street. The Project proposes to convert Mesquit Street from Jesse Street to 7th Street to the Mesquit Paseo, a pedestrian paseo with limited vehicular access (e.g., for emergency vehicles). Thus, with the approval of the above requests, the Project would be in compliance with LAMC Section 12.37.

(e) Plan for a Healthy Los Angeles

As discussed above, the Plan for a Healthy Los Angeles provides guidelines for the City to follow 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. The Project would promote a healthy built environment by providing open space, recreational amenities, and new streetscapes to encourage walking and to enhance the pedestrian environment. The Project would support Policy 2.10, Social Connectedness, through its inclusion of the various Entry Plazas, the Elevated Pedestrian Walkway, and the Mesquit Paseo, which would allow easy pedestrian access to retail areas, outdoor seating, landscaping, and event programming, all of which promote social connectedness. The Project would also support Policy 5.7, Land Use Planning for Public Health and Greenhouse Gas (GHG) Emission Reduction, by reducing single-occupant vehicle trips by virtue of its location and complementary mix of uses within proximity to transit. In addition, the Project would incorporate design elements and Mitigation Measure TRAF-MM-1 which would include TDM measures to reduce single-occupant vehicle trips. The Project would not interfere with other policies recommended by the plan. Therefore, the Project would not conflict with the policies of the Plan for a Healthy Los Angeles adopted to protect the environment and reduce VMT.

(f) Citywide Design Guidelines

As discussed above, the Citywide Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The design guidelines are organized around Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Guideline 1 of the Citywide Design Guidelines recommends promoting a safe, comfortable and accessible pedestrian experience for all. Guideline 2 of the Citywide Design Guidelines recommends incorporating vehicle access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right-of-way; and on corner lots, orienting parking as from the corner as possible. The Project design includes pedestrian connections and amenities throughout the Project Site, as well as secured bicycle parking. In addition, adequate sidewalks would be provided, in accordance with the Mobility Plan 2035's required sidewalk widths. Furthermore, specifically for Mesquit Street, as it would be redesignated as a Local Street-Limited and would transition Mesquit Street from a vehicle-accessed street into the Mesquit Paseo and allow for more pedestrian circulation across the Project Site, Guideline 3 recommends designing projects to actively engage with streets and public space and maintain human scale. Trees and sidewalk plantings would be incorporated to provide adequate shade and habitat and provide a more comfortable mobility environment for pedestrians. The Project would promote the safety and comfort of pedestrians by activating ground-level frontages with street-level ground floor uses at all buildings on the Project Site. The Project is also located in proximity to active commercial uses and residential neighborhoods, as well as local transit opportunities. The Project would incorporate elements of shade, natural light, and ventilation as considerations in the

design by providing street trees and landscaped areas to provide shaded spaces for community benefits. Therefore, the Project would align with Citywide Design Guidelines to provide a safe, comfortable, and accessible experience for all transportation modes. The Project would not conflict with the Citywide Design Guidelines.

Based on the above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Therefore, impacts would be less than significant.

(g) Project with the Deck Concept

As stated in Chapter II, *Project Description*, the Applicant seeks to construct a 132,000-square foot Deck that would extend over a portion of the off-site Railway Properties east of the Project Site. The Project with the Deck Concept would develop the same uses as proposed under the Project, and would include a 132,000 square foot Deck in place of the Elevated Pedestrian Walkway as the connection between the Project's River Balconies along the eastern edge of the Project Site, which could host outdoor event programming such as a weekly farmers market, group exercise classes, and busking. The Project with the Deck Concept would include the same roadway and driveway improvements as under the Project. The Project with the Deck Concept would include the Deck on the 7th Street level and would extend the pedestrian oriented open space area further east in closer proximity to the Los Angeles River. Under the Project with the Deck Concept, pedestrian access from the south would be provided directly from the 7th Street Bridge via the South River Balcony to the Deck, as well as via the Entry Plaza between Buildings 4 and 5 that would connect to the Mesquit Paseo. Pedestrian access from the north would be provided from the Northern Landscaped Area, which would connect to the North River Balcony and the Deck. Pedestrians would be able to similarly move from the Mesquit Street level to the 7th Street Level and Deck through the Entry Plazas.

The Project with the Deck Concept would provide a sizeable publicly accessible open space amenity area, in addition to the open space provided under the Project, that would further enhance the new pedestrian connections across the Project Site and for the vicinity. The construction of the Deck under the Project with the Deck Concept would provide residents, visitors, and employees with additional and convenient access to future Metro transit projects, including the potential future Arts District/6th Street Station. The Project with the Deck Concept would develop the same residential and commercial uses as the Project, and the Project with the Deck Concept would provide the same bicycle and vehicle parking spaces as under the Project. The Project with the Deck Concept would also include the same TDM measures provided for in Mitigation Measure TRAF-MM-1 to discourage single-occupancy vehicle trips.

Therefore, based on the above, the Project with the Deck Concept would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have

been adopted to protect the environment and reduce VMT. Therefore, impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the Project's consistency with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

The Project is estimated to generate a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. Additional details regarding the VMT analysis are available in Appendix M-1.

(a) Residential VMT

The daily residential VMT per capita is estimated at 4.0 for the Project, below the threshold of 6.0 for the Central APC. Thus, the Project would have a less-than-significant impact on residential VMT per capita as estimated by the VMT Calculator.

(b) Work VMT

The daily work VMT per employee is estimated at 6.6 for the Project, below the threshold of 7.6 for the Central APC. Thus, the Project would have a less-than-significant impact on work VMT per employee as estimated by the VMT Calculator.

(c) Regional-Serving Retail VMT

Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. The City's model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project TAZ with all retail uses included.[26] This is a net increase of 32,000 daily miles, or a 0.03 percent

[26] As indicated under Subsection 3.b, *Methodology*, the VMT analysis of retail uses for the Project presents a worst case scenario based on additional outdoor programing that would occur under the Project with the Deck Concept. Although the Project analysis presents a worst case scenario, the retail VMT impact findings for the Project would not be materially different if the added outdoor programing were not included.

increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional-serving retail occurs.

Project-generated VMT would be below the City's household and work VMT significance thresholds, as applicable. However, Project-generated VMT would exceed the City's regional-serving retail VMT threshold and, therefore, the Project would result in a significant VMT impact.

(d) Project with the Deck Concept

The Project with the Deck Concept is estimated to generate a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. Additional details regarding the VMT analysis are available in Appendix M-1. Similar to the Project, the daily residential VMT per capita and daily work VMT per employee are estimated at 4.0 and 6.6, respectively, for the Project with the Deck Concept. Both would be below the thresholds for the Central APC and would have a less-than-significant impact as estimated by the VMT Calculator.

As indicated for the Project, under the Project with the Deck Concept the model estimated a net increase of 32,000 daily miles, or a 0.03 percent increase in VMT from the network with retail uses included. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to retail occurs.

VMT generated by the Project with the Deck Concept would be below the City's household and work VMT significance thresholds, as applicable. However, VMT generated by the Project with the Deck Concept would exceed the City's regional-serving retail VMT threshold and, therefore, the Project with the Deck Concept would result in a significant VMT impact.

(2) Mitigation Measures

The following mitigation measure was identified to reduce regional-serving retail VMT below the significance threshold.

> **TRAF-MM-1: Transportation Demand Management (TDM) Program.** The Applicant shall implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall detail additional program elements beyond the site design features already incorporated into the Project. The TDM Program shall be subject to review and approval by LADOT. The exact measures to be implemented shall be determined when the Program is prepared. A preliminary TDM Program shall be submitted for LADOT review prior to issuance of the first building permit for the Project, with final TDM approval by LADOT required before issuance of the first certificate of occupancy

for the Project. Required strategies in the TDM Program shall include, but are not necessarily limited to:

Parking

- Parking cost unbundled from leases for office and commercial tenants, coupled with employee parking cash-out and pricing workplace parking.
- Parking costs unbundled from rent for residential tenants.

Transit

- Tenants in the office and commercial uses and residents shall be provided with the opportunity to obtain subsidized/discounted daily or monthly public transit passes to use locally/regionally. These passes can be partially or wholly subsidized by the employer and residential management company, respectively.
- Public bus stop enhancements/amenities, such as curb cuts and continental crosswalks, at bus stops nearest to Project Site:
  - Decatur Street & 7th Street: Metro Rapid 720
  - Alameda Street & 7th Street: Metro Rapid 760
  - Imperial Street & 7th Street: Metro 18, 60, 62
  - Molino Street & Palmetto Street: LADOT DASH A
- Improved first-mile/last-mile connections to nearby bus stops

Commute Trip Reductions

- Commute trip reduction program for office and commercial workers and residents including established performance standards, required implementation, monitoring, and reporting.

Shared Mobility

- A ride-sharing program shall be provided by designating a certain percentage of parking spaces for ride sharing vehicles, designing adequate passenger loading/unloading and waiting areas for ride-sharing vehicles, and providing a website or message board for coordinating rides.

Education & Encouragement

- TDM marketing and promotion (website and possible mobile app for transportation information specific to the Project).
- Mobility hub (car share, bike share, bike repair facilities, and real-time transit information).

(3) Level of Significance After Mitigation

With implementation of Mitigation Measure TRAF-MM-1, the Project is estimated to generate a total of 24,484 daily vehicle trips and a total daily VMT of 176,517. The daily residential VMT per capita is projected to be reduced by 18 percent from 4.0 to 3.3 for the Project, which would continue to not be a significant impact under the City's criteria. The daily work VMT per employee is projected to be reduced by 18 percent from 6.6 to 5.4 for the Project, which would continue to be a less than significant impact under the City's criteria.

Elements of Mitigation Measure TRAF-MM-1 related to pedestrian, bicycle, and transit amenities would also help to reduce retail trip making and would partially offset the increase in VMT projected for the Project's retail uses. The Transportation Assessment is conservative in that it does not quantify the partial reduction in regional-serving retail VMT that is expected from the TDM measures. This is because there is insufficient research to do so. There are no additional feasible mitigation measures that would further reduce the retail VMT impact for the Project. With implementation of Mitigation Measure TRAF-MM-1, the Project-generated regional-serving retail VMT impact would be significant and unavoidable.

(a) Project with the Deck Concept

With implementation of Mitigation Measure TRAF-MM-1, the Project with the Deck Concept is estimated to generate a total of 24,901 daily vehicle trips and a total daily VMT of 179,481. The daily residential VMT per capita is projected to be reduced by 18 percent from 4.0 to 3.3 for the Project with the Deck Concept, which would continue to not be a significant impact under the City's criteria. The daily work VMT per employee is projected to be reduced by 18 percent from 6.6 to 5.4 for the Project, which would continue to be a less than significant impact under the City's criteria.

Elements of Mitigation Measure TRAF-MM-1 related to pedestrian, bicycle, and transit amenities would also help to reduce retail trip making and would partially offset the increase in VMT projected for the Project with the Deck Concept's retail uses. The TA is conservative in that it does not quantify the partial reduction in regional-serving retail VMT that is expected from the TDM measures. This is because there is insufficient research to do so. There are no additional feasible mitigation measures that would further reduce the retail VMT impact for the Project with the Deck Concept. With implementation of Mitigation Measure TRAF-MM-1, the Project with the Deck Concept-generated regional-serving retail VMT impact would be significant and unavoidable.

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

(1) Impact Analysis

(a) Local Safety

Pedestrian access to the Project Site would be provided via new sidewalks around the perimeter of the Project Site and through the Entry Plazas, Mesquit Paseo, and Elevated Pedestrian Walkway, all of which would be accessible to the public. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians but would need to dismount and walk bicycles through the Project Site. The short-term bicycle parking spaces on the sidewalks would be oriented toward Mesquit Street and 7th Street, and would be sited along Mesquit Street near the pedestrian entrances to Project's housing, the hotel, and commercial uses, including retail uses, the Arts District Central Market, the grocery store, restaurants, studio/event/ gallery and potential museum space, and the gym. In addition, some short-term bicycle parking spaces would be located above-grade and inside of the parking structure near the 7th Street entrance in order to also allow for areas for pedestrian circulation and streetscape plantings along the Mesquit Paseo. The long-term bicycle parking spaces would be sited in various locations throughout the parking structure. Long-term spaces would be secured from the general public and enclosed to protect bicycles from inclement weather. Cyclists would be able to access on-site bicycle parking facilities through a ground floor entrance on the southern end of the Entry Plazas between Buildings 3 and 5 and elevators between Buildings 2 and 3. 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 and would be designed to applicable City standards and requirements. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.

Four driveways would provide vehicular access to/from the Project Site:

- A two-way full-access driveway on Mesquit Street at the northern end of the Project at ground level (Building 1).
- A two-way full-access driveway at the intersection of Mesquit Street & Jesse Street at ground level (Building 2).
- A two-way signalized driveway connecting the 7th Street Bridge to the third level of Building 4 near the southeastern corner of the Project Site that allows for full access out and right-turns only in.
- A one-way right-turn-out-only driveway connecting the 7th Street Bridge to the second level of Building 5 near the southwestern corner of the Project Site.

The Project would reduce the total number of vehicle access points to four driveways compared to existing conditions, as there are currently three driveways and five loading docks on the existing frontage along Mesquit Street south of Jesse Street for loading and

unloading at the existing cold storage facility. The Project proposes to locate loading docks for trucks and residential and hotel uses on the eastern sides of Buildings 1, 2, 3, and 5, and would have sufficient turnaround capacity within the ground level of the Project Site accessible from Mesquit Street. All trucks and other loading vehicles would enter and exit the parking structure through the northern driveway on Mesquit Street.

The driveways would be designed to comply with LADOT standards. The Project proposes to install a signal for the eastern driveway on 7th Street, which is designated as an Avenue II. This signalized driveway would restrict vehicles from turning left into the driveway and would have a crosswalk to facilitate pedestrians crossing 7th Street. The western driveway proposed on 7th Street would limit vehicles to only turn right out of the driveway to 7th Street. 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. None of the Project frontages are along streets that are part of the HIN. **Therefore, the Project and its driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant.**

(b) Freeway Safety

As noted previously, the interim guidance on freeway safety analysis requires freeway off-ramps where a proposed project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. The Project is projected to add 25 or more trips to the following freeway off-ramps:

- I-10 Eastbound Off-ramp to Alameda Street (AM peak hour)
- US-101 Southbound Off-ramp to 7th Street (AM peak hour)
- I-10 Eastbound Off-ramp to Porter Street (AM peak hour)

For the identified freeway off-ramps, a queuing study was conducted for the “Future with Project” conditions for the Project with the Deck Concept, which would generate the highest number of peak hour trips. If the proposed project traffic is expected to cause or add to a queue extending onto the freeway mainline by less than two car lengths, the proposed project would cause a less-than-significant safety impact. If the queue is already extending or projected to extend onto the freeway mainline, and the addition of traffic generated by the proposed project would increase the overflow onto the mainline lanes by less than two car lengths, the project would cause a less-than-significant safety impact.

The addition of traffic generated by the Project is projected to increase the overflow onto the mainline lanes by six cars in the AM peak hour and 2 cars in the PM peak hour (assuming an average queue storage length of 25 feet per car) for the US-101 Southbound Off-ramp to 7th Street in both Future Base (2026 and 2040) plus Project scenarios. The queue lengths are not projected to exceed the ramp storage capacity at

the I-10 Eastbound Off-ramp to Alameda Street or the I-10 Eastbound Off-ramp to Porter Street in either Future Base (2026 or 2040) or Future plus Project scenario.

If a proposed project adds two or more car lengths to the ramp backup that extends to the freeway mainline, then the location must be tested for safety issues which include a test for speed differential between the off-ramp queue and the mainline of the freeway during the particular peak hour. If the speed differential between the mainline lane speeds and the ramp traffic is below 30 mph, the project would be considered to cause a less-than-significant safety impact. If the speed differential is 30 mph or more, then there is a potential safety issue.

Per the guidance, Caltrans Performance Measurement System (PeMS) data were used to identify freeway operating speed(s) during the peak hour being analyzed. The PeMS data showed that the average mainline speed on US-101 Southbound freeway near the 7th Street Off-ramp is 57 miles per hour. Assuming that the traffic queued on the ramp is traveling at zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue at the US-101 Southbound Off-ramp to 7th Street.

Therefore, the Project would potentially substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be potentially significant.

(c) Project with the Deck Concept

Under the Project with the Deck Concept, similar points of pedestrian access to the Project Site would be provided as compared to the Project. The Project with the Deck Concept would, similar to the Project, provide new sidewalks and bicycle parking facilities. The same driveways would be developed under the Project with the Deck Concept. **Therefore, the Project with the Deck Concept and its driveways would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant.**

Traffic generated by the Project with the Deck Concept would, similar to the Project, increase the overflow onto the freeway mainline lanes by more than two cars for the US-101 Southbound Off-ramp to 7th Street. **Therefore, the Project with the Deck Concept would potentially substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts on freeway safety would be potentially significant.**

(2) Mitigation Measures

Impacts related to hazardous design features for local safety were determined to be less than significant without mitigation; therefore, no mitigation measures are required.

Regarding freeway safety, the interim guidance suggests corrective measures to offset the potential safety issue, such as a TDM program to reduce trip generation, investments

to active transportation infrastructure or transit system amenities, operational changes to the ramp terminal operations, or a physical change to the ramp itself. Per the guidance, the following mitigation measure was identified to address the potential impact for both the Project and the Project with the Deck Concept identified above:

> **TRAF-MM-2: US-101 Southbound Off-ramp/7th Street Intersection Signalization.** The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. This would require complying with the Caltrans project development process as a local agency-sponsored project.

Peak hour signal warrants conducted at this intersection as part of the TA, which is included as Appendix M-1 of this Draft EIR, indicate that intersection signalization is warranted for both the AM and PM peak hours. Intersection signalization is estimated to reduce the off-ramp queue such that it would no longer extend onto the freeway mainline and would mitigate the Project impact in both Future Base (2026 and 2040) plus Project scenarios. Detailed queue calculations are provided in Appendix M-1.

(3) Level of Significance After Mitigation

Impacts related to hazardous design features for local safety were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Regarding freeway safety, with implementation of Mitigation Measure TRAF-MM-2, which would include the installation of a signal at the intersection of the US-101 Southbound Off-ramp and 7th Street, operational impacts related to freeway safety for both the Project and the Project with the Deck Concept would be reduced to a less than significant level. With the inclusion of the signal, the off-ramp queue would be sufficiently reduced and would not extend onto the freeway mainline and therefore, no further corrective actions per the interim guidance would be deemed necessary. However, since the intersection of the US-101 southbound Off-ramp and 7th Street is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable.

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

(1) Impact Analysis

The Project would include temporary construction activities (e.g., temporary lane closures, etc.) and traffic that could potentially affect emergency access to the Project Site and surroundings. However, the construction activities would not require full street closures (i.e., at least one travel lane would be open at all times) and most Project construction activities would be confined to the Project Site. Furthermore, as indicated in Sections IV.K.1, *Fire Protection*, and IV.L, *Transportation*, in this Draft EIR, Project

construction activities would result in less than significant impacts to emergency access, emergency response and traffic with implementation of the Construction Traffic Management Plan (see TRAF-PDF-1). Because of the short-term nature of the construction activities and with implementation of a Construction Traffic Management Plan, the Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction.

The Project Site is 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. As discussed in Section IV.K.1, *Fire Protection*, impacts to these services from Project implementation would be less than significant. As discussed therein, emergency access to the Project Site would be provided from major roadways near the Project Site, including 6th Street and 7th Street. Specifically, the currently contemplated Project design would allow for LAFD emergency access using fire apparatus access roads in accordance with applicable requirements found in LAMC Section 57.503, which would be confirmed as part for the final design review per LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. Access would be provided along 6th Street and Mesquit Street, including the Mesquit Paseo, such that all portions of the first story of the buildings are located within 150 feet of an apparatus access road in accordance with LAMC Section 57.503.1. The intersection of Jesse Street and Mesquit Street would have removable bollards, at the northern end of the Mesquit Paseo, for emergency services access and for turnaround access. Automatic or removable bollards would comply with requirements of LAMC Section 503.5.3 and the exact mechanism and methodology would be coordinated with LAFD to ensure compliance with best-practices and applicable requirements for such traffic separations. Thus, the Project would not include the installation of barriers that could impede emergency vehicle access. By utilizing a fire apparatus turn around that complies with LAFD requirements and Los Angeles Department of Public Works minimum turnaround requirements, access roads would not be required along the Los Angeles River/Amtrak right of way. Access roadways would be provided with a minimum clear width of 28 feet in order to accommodate aerial apparatus access in accordance with LAMC Section 502.1.6 Item 2.

In addition, as discussed in Section IV.F, *Hazards and Hazardous Materials*, none of the streets adjacent to the Project Site is a City-designated disaster route. The closest routes are Santa Fe Avenue located one-half block to the west, I-10 located approximately 0.38 mile to the south, and US-101 located approximately 0.37 mile to the east. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation.

Compliance with applicable Los Angeles Building Code and Fire Code requirements would be demonstrated 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 as part of existing regulatory procedure prior to the issuance of a building permit.

Based on the above, Project impacts with respect to emergency access would be less than significant.

(a) Project with the Deck Concept

Construction activities for the Project with the Deck Concept would be similar to the Project and could potentially affect emergency access to the Project Site and surroundings. However, similar to the Project, the construction activities for the Project with the Deck Concept would not require full street closures and most activities would be confined to the Project Site. With implementation of Project Design Feature TRAF-PDF-1, Construction Traffic Management Plan, the Project with the Deck Concept's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project with the Deck Concept would not result in inadequate emergency access during construction.

During Project with the Deck Concept operation, as described above, drivers of emergency vehicles would 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. **Based on the above, Project with the Deck Concept impacts with respect to emergency access would be less than significant.**

(2) Mitigation Measures

Impacts related to emergency access were determined to be less than significant without mitigation; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The cumulative analysis generally considers any related projects located within a 2-mile radius of the Project Site and any transportation system improvements in the Project vicinity. Related projects include 141 land use projects (i.e., residential, retail, warehouse) in the City of Los Angeles, which are identified Table III-1, Related Projects List, and Figure III-1, Related Projects Map, in Chapter III, *Environmental Setting*, of the Draft EIR.

(1) Impact Analysis

With regard to conflicts with a program, plan, ordinance or policy addressing the circulation system, the nearest related project to the Project Site is a mixed-use office,

retail, and restaurant project at 640 South Santa Fe Avenue called "Produce LA," located across Mesquit Street from the Project. This project, currently under construction, will maintain the existing sidewalks along its frontages on Santa Fe Avenue and Mesquit Street and has replaced the existing sidewalk along its frontage on Jesse Street. South Santa Fe Avenue is designated as an Avenue II by Mobility Plan 2035, but the existing right-of-way and roadway widths along the 640 South Santa Fe Avenue project frontage are narrower than the Avenue II specifications. Jesse Street and Mesquit Street are designated as Collector streets by Mobility Plan 2035 and the existing right-of-way widths are narrower than the Collector street specifications. In accordance with the Citywide Design Guidelines and Mobility Plan 2035, the Produce LA project dedicated 18 feet along South Santa Fe Avenue and seven feet along Mesquit Street and widened Jesse Street by seven feet, which included replacing the existing sidewalk, along the project frontages.[27] This related project proposes an all-access driveway, with the exception of outbound left turns, on South Santa Fe Avenue and an inbound-only driveway on Mesquit Street. No cumulative impacts are anticipated on Mesquit Street, where the Project proposes two driveways because the majority of the related project driveway activity would likely occur on South Santa Fe Avenue based on the proposed driveways. Therefore, traffic volumes for the Project and related project would be distributed on multiple streets rather than concentrating all travel on Mesquit Street. Other related projects located farther from the Project Site would not share adjacent street frontages with the Project Site. No significant cumulative impacts are anticipated to which both the Project and other nearby related projects would contribute in regard to City transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. **As such, cumulative impacts on conflicts with a program, plan, ordinance or policy addressing the circulation system would be less than significant.**

With regard to VMT, according to the TAG, 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 project impact 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 the SCAG 2020–2045 RTP/SCS. As demonstrated in the Project–level VMT analysis above, the Project's VMT household and work per capita would be below the City's efficiency-based impact thresholds, and as such, the Project's contribution to cumulative transportation VMT impacts residential and work VMT would not be considerable. The Project-level VMT analysis identified a significant impact with respect to regional-serving retail VMT. However, given its location in a dense area of the City served by public transit, the mixed-use nature of the Project, its provision of features to encourage walking and bicycling, and its proposed implementation of a TDM plan, the Project would be consistent with the applicable goals and objectives of the SCAG 2020–2045 RTP/SCS to locate diverse jobs and housing in infill locations served by multiple transportation options and promote sustainable

[27] Office of the Assessor Count of Los Angeles, Assessor Map Tract No 8772.

transportation options. See Section IV.H, *Land Use and Planning*, for more details on the Project's consistency with the 2020–2045 RPT/SCS. Therefore, since the Project is consistent with the applicable goals and objectives of the SCAG 2020–2045 RTP/SCS, its contribution to cumulative transportation VMT impacts to regional-serving retail VMT would be less-than-significant. **As such, cumulative impacts on VMT would be less than significant.**

With regard to geometric design hazards, the Project would result in a significant and unavoidable freeway safety impact as Mitigation Measure TRAF-MM-2 to be implemented at the intersection of the US-101 southbound Off-ramp and 7th Street is outside of the jurisdiction of the City and would require a decision by Caltrans, which may not be guaranteed. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, 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, given the Project's significant and unavoidable impact on freeway safety associated with geometric design hazards, the Project's contribution to cumulative impacts associated with hazardous design conditions would represent a significant cumulative impact.**

With regard to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding 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. As discussed in Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, none of the streets within or adjacent to the Project Site are designated Disaster Routes City-selected disaster routes. Construction durations and activities of the related projects located along Santa Fe Avenue, 7th Street, and the I-10 Freeway would potentially overlap. Similar to the Project, related projects would be anticipated to implement Construction Traffic Management Plans and Construction Worker Parking Plans to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project.

No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. While the Project would vacate Mesquit Street from 6th Street to 7th Street, the new Mesquit Paseo would still allow for limited vehicular access (e.g., for emergency vehicles). As with the Project, related projects would be reviewed by the LAFD to ensure compliance with

the City's requirements relative to the provision of emergency access as part of the City's standard plan check review process. Furthermore, since modification to emergency 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. **As such, cumulative impacts on emergency access would be less than significant.**

(a) Project with the Deck Concept

Cumulative impacts associated with potential conflicts with a program, plan, ordinance or policy addressing the circulation system would be similar under the Project or the Project with the Deck Concept. As the Project with the Deck Concept would have the same driveways, same uses, and would implement the same TDM measures as proposed under the Project, traffic volumes would be distributed between the Project with the Deck Concept and related project – based on the related project's proposed driveways - rather than concentrating all travel on Mesquit Street. Other related projects located farther from the Project Site would not share adjacent street frontages with the Project Site under the Project with the Deck Concept. Similar to the Project, no significant cumulative impacts are anticipated to which both the Project with the Deck Concept and other nearby related projects would contribute in regard to City transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. **As such, cumulative impacts on conflicts with a program, plan, ordinance or policy addressing the circulation system would be less than significant.**

With regard to potential cumulative VMT impacts, as discussed above under Threshold (b), Mitigation Measure TRAF-MM-1 would not reduce regional-serving retail VMT to less than significant levels and would therefore be significant and unavoidable. However, similar to the Project, given its location in a dense area of the City served by public transit, the mixed-use nature of the Project with the Deck Concept, its provision of features to encourage walking and bicycling, and its proposed implementation of a TDM plan, the Project with the Deck Concept would be consistent with the 2020–2045 RTP/SCS and its contribution to cumulative transportation VMT impacts to regional-serving retail VMT would be less-than-significant. **As such, cumulative impacts on VMT would be less than significant.**

With regard to geometric design hazards related to freeway safety, the traffic volumes for the freeway ramps analyzed in the TA account for cumulative related projects' traffic. As stated in the TA and above, the Project with the Deck Concept would add six vehicles (assuming an average queue storage length of 25 feet per car), which exceeds the threshold of adding two vehicles, to a queue that already exceeds the off-ramp capacity in the AM peak hour in future year 2026 and 2040. The Project with the Deck Concept would result in a significant and unavoidable impact as Mitigation Measure TRAF-MM-2 to be implemented at the intersection of the US-101 southbound Off-ramp and 7th Street is outside of the jurisdiction of the City and would require a decision by Caltrans, which may not be guaranteed. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for

vehicles, pedestrian, and bicyclists. 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, and such cumulative impacts would be less than significant. **However, as the traffic volumes for the freeway ramps take into consideration the traffic that would be generated by the related projects, in conjunction with the Project with the Deck Concept's significant and unavoidable impact on freeway safety associated with geometric design hazards, the Project with the Deck Concept's contribution to cumulative impacts associated with hazardous design conditions would represent a significant cumulative impact.**

With regard to emergency access, the Project with the Deck Concept would not result in a project-level significant impact. None of the streets within or adjacent to the Project Site are designated Disaster Routes City-selected disaster routes. Similar to the Project, related projects would be anticipated to implement a Construction Traffic Management Plans and Construction Worker Parking Plans to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans will ensure construction activities of the concurrent nearby related projects and associated hauling activities are managed in collaboration with one another and the Project with the Deck Concept.

No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project with the Deck Concept. As with the Project, related projects would be reviewed by the LAFD to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency 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. **As such, cumulative impacts on emergency access would be less than significant.**

(2) Mitigation Measures

Refer to Mitigation Measure TRAF-MM-2 to reduce cumulative impacts to geometric design hazards related to freeway safety. No additional mitigation measures are required.

(3) Level of Significance After Mitigation

With implementation of Mitigation Measure TRAF-MM-2, cumulative impacts to geometric design hazards related to freeway safety would be reduced to a less than significant level. However, since the intersection of the US-101 southbound Off-ramp and 7th Street is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, the impacts related to freeway safety would remain significant and unavoidable. All other cumulative transportation impacts were determined to be less than significant without mitigation.

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